OICA is favourable to proposed amendments to ECE Regulation N° 43 in order to allow for type approval of vehicles with regard to the installation of safety glazings.

However, OICA would kindly request GRSG to take into account the following comments on the above reference document:

Paragraph 2.18.2, replace by the following:
"Safety glazing not requisite for driver’s field of vision" means all the glazing not covered by paragraph 2.18.1 and through which the driver need not to see the road rearwards by means of any rear view mirror.

Annex 14
Insert new paragraph 6.1.3.3.
For sun roofs, the abrasion test is not required.

Annex 16
Insert new paragraph 6.1.3.3.
For sun roofs, the abrasion test is not required.

Annex 21 paragraph 4.2.2.2., amend to read:
Subject to the provisions of paragraph 4.2.2.1., the safety glazing where the driver’s field of vision, as defined in paragraph 2.18.2 of this regulation, is obtained by means of two external rear view mirrors, need not have a regular light transmittance.

Annex 21 paragraph 4.2.2.3., amend to read:
In the case of plastic panes, the safety glazing shall bear the following additional symbol as defined in paragraph 5.5.5 or 5.5.7 of this regulation.
- for paragraph 4.2.2.1: B/L or C/L
- for paragraph 4.2.2.2: B/L, B/M, C/L or C/M

Annex 21 paragraph 4.2.3.2.1 should be numbered as paragraph 4.2.3.2.

Annex 21 paragraph 4.2.3.3, amend to read:
Where sun roofs are constituted of plastic panes, they shall bear one of the additional symbols, as defined in paragraph 5.5.5, 5.5.6 or 5.5.7 of this regulation.
Justification:

Paragraph 2.18.2:
The front side glass would belong to both definitions of para. 2.18.1 and para. 2.18.2. It should be clarified which definition the front side glass belongs to.

Annex 14 and Annex 16 new paragraph 6.1.3.3.:
The regular light transmittance is not required for sun roofs because they are neither requisite for direct nor for indirect driver's vision. Therefore, such glazing can be exempted from the abrasion resistance requirement.

Annex 21 paragraph 4.2.2.3
"/A" symbol should be deleted as it is for forward facing panels. The abrasion resistance level "/M" should also be accepted when the driver's indirect field of vision is obtained by means of two external rear view mirrors.

Paragraph 4.2.3.3:
The possibility to use a flexible-plastic glazing and rigid plastic double-gazed unit for sun roof should be accepted to allow the unhindered development of new technologies.