

GRE Informal Working Group
“Conspicuity Markings”
1st Meeting
Brussels, 3 March 2005

1. Confirmation of Report from Preliminary Meeting (GRE-CM-1-12)

NL asked that the comment attributed to them on page 3 of the report be amended to read,

“They support at ~~national and~~ European level measures to mandate conspicuity markings, as such are supportive of the DE proposal. However, first questions concerning applicability, durability, etc. need to be answered.”

With this amendment included, the report was agreed.

2. Presentation of Position Papers

By the Netherlands (GRE-CM-1-5)

NL emphasised that they supported the introduction on mandatory requirements in R48, as this would provide the widest harmonised application. However, they considered that any provisions should be limited to line markings on M3, N3, O3 and O4 vehicles. In addition, they considered that it was important that the issue of applicability (adherence to a surface) and durability. They considered that retro-fitment should be permitted under national requirements.

By CLEPA (GRE-CM-1-6)

CLEPA commented that lifetime/durability issues should be a matter for market forces, and is not a requirement for other lighting devices. They also questioned whether there should be requirements for markings to the front of a vehicle.

By France (GRE-CM-1-7)

FR supported the introduction of mandatory requirements in R48, but considered that line markings would be sufficient as a mandatory requirement, with contour markings being at the discretion of the Contracting Parties. They suggested that perhaps side retro-reflectors could be optional on vehicles fitted with conspicuity markings. FR questioned the safety implications of marked tractors towing unmarked trailers, and vice-versa.

By OICA (GRE-CM-1-8)

OICA supported the principle of improving the conspicuity of vehicles, but questioned whether line or contour markings were the best way, and noted that not all the fleet comply with the current lighting requirements, and that some countries already have additional requirements. Further, they envisage problems taking account of all the different ‘types’ of commercial vehicles, especially those that are incomplete or for ‘special purposes’ – in many cases it would be impossible to fulfil the 80% requirement.

Principally they considered that the installation of such markings should be a use requirement rather than a type-approval requirement.

By Japan (GRE-CM-1-9)

JP stated that they would prefer conspicuity markings not to be mandated because they considered them costly and remained to be convinced of their effectiveness. However, if they were mandated, chassis-cabs should be excluded, only side markings should be required on tractor units; the markings should be able to substitute R70 markings on the rear; and the installation guidelines in R104 should be followed, although there should be a limit on the amount of retro-reflective material that can be mounted on the side of the vehicle.

By IRU

IRU informed the meeting that their position was currently unconfirmed, subject to a meeting taking place the following day. Nonetheless, their priority is cost-effective road safety. They informed the meeting that they had for many years been calling for an accident causation study which has recently started and is being conducted in 7 Member States of the EU, and is due to end October/November 2005. IRU are committed to applying the results of this study and considered the results of this study should be awaited.

By Italy

The Chairman informed the meeting that although IT could not be present, they wished to inform the meeting that they would be mandating the use of R104 line markings on vehicles of categories N2, N3, O3 and O4, from 1/4/2005 for new vehicle and 31/12/2005 for existing vehicles. These provisions were being applied as 'in-use' requirements. As regards colours, they required white or yellow to the side and yellow or red to the rear. These provisions are part of a road safety package adopted in 2003. Therefore, IT supports these markings becoming mandatory in R48.

By EC-DG TREN (GRE-CM-1-10)

EC-DG TREN introduced their position paper summarising the study by TÜV Rheinland that the Commission had sponsored. They were of the view that contour marking should be the mandatory requirement as the majority of vehicles could have them applied and they offered a safety improvement over line markings. Further, contour markings had a significant positive cost-benefit ratio, which because of their safety benefits more than justified them being mandated rather line markings. They informed the meeting that they had no plans to require the retro-fitting of these markings, but there was a need for fast action. As regards colour, they expressed a preference for white and yellow, as these were the highest performing.

By the Chairman (GRE-CM-1-11)

The Chairman introduced a draft proposal for the application of conspicuity markings as mandatory provisions in Regulation 48. He summarised the document by stating that R48 naturally broke the subject up into 3 main areas: definitions; colours and installation. Within installation there are sub-issues relating to the vehicle type, the type of line marking to be fitted, the positioning of the markings on the vehicle (including geometric visibility).

Transitional provisions would also need to be considered, as would the information on the type-approval document

3. Key Discussion Points

During and following the presentations of the above documents a number of issues were discussed. Below can be found the key discussion points, and the status of agreement on them.

Constructional vs Use Requirement

There was general agreement that conspicuity markings would be best addressed as a constructional requirement within the provisions of R48

Use requirements (including retro-fitment) should be addressed at a national level; however, efforts should be made to ensure that the provisions for conspicuity markings in R48 do not restrict the ability of contracting parties to be able to require additional conspicuity markings on vehicles or retro-fitment as a national use requirement.

Categories of Vehicles

There was broad agreement on which categories of vehicle should be fitted with conspicuity markings and those which should not, as follows:

Prohibited: on vehicles of categories M_1 and 0_1 .

Optional: on vehicles of categories M_2 , $[M_3]$, N_1 , $N_2 \leq 7.5$ tonnes, and 0_2 , and on [chassis-cabs];

Mandatory: on all other vehicle categories (i.e. $N_2 > 7.5$ tonnes, $[M_3]$, N_3 , 0_3 and 0_4).

Further consideration will need to be given to provisions for tractor units, chassis-cabs and M_3 category vehicles, although there was general consensus that city/urban should not be required to be equipped with conspicuity markings.

Type-approval of multi-stage vehicles

Concerns were expressed about how the installation of conspicuity markings would be regulated within the type-approval process for multi-stage vehicle. It was accepted that this should be considered, but not specifically by this working group, as it is already a situation that exists with regards to other lighting devices that are either not required on a chassis-cabs, or may be removed from the chassis cab and subsequently installed on the bodywork of the final vehicle.

Line vs Contour markings

There was no agreement on whether line markings or contour markings should be the mandatory requirement.

DE, EC-DG TREN, and CLEPA argued that contour markings, as they gave the greatest safety benefit and had a significant benefit-cost ratio of up to 4 times, should be the obligatory requirement, with line markings being permitted as an exemption.

NL, FR, OICA and IRU argued that line markings provided sufficient conspicuity and should be the obligatory requirement, with contracting parties being able to mandate/encourage contour markings at a national level.

It was noted that IT will require line markings as a national use requirement, and that existing studies only seemed to give cost-benefit ratios for contour markings.

Colours

Further consideration needs to be given to the accepted colours to the rear.

Quality of markings

Concerns were raised about the durability of the markings with regard to their adherence to a surface and their flexibility when applied to curtain-sides — the markings having to be durable in both extreme heat and cold. It was noted that environmental tests were already in R104 with regard to the photometric performance, and that these could be extended to include durability requirements. It was agreed that the quality/durability issue should not be addressed in R48. CLEPA was of the opinion that durability was a market issue, their members already offering written warranties up to 7 years; nonetheless they agreed to prepare a draft amendment to R104 for consideration.

4. Date of next meeting

Friday, 27 May 2005, Germany

Venue: MAN, Munich, Germany

Delegates were invited to submit documents for consideration at the next meeting to the Chairman before 13 May 2005.

Neil Bowerman, ENTR/F/5 AN88, 02/47 Tel: 57680 May 2005
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Attendance List

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