

## **Proposal to introduce a mandatory provision in UN Regulation No. 107 to provide a dedicated space for prams in Class I buses**

After careful consideration of the above-mentioned proposal, the IRU and its members are of the opinion that this proposal should be rejected for the following reasons:

- The existing provisions of Directive 2001/85/EC requiring a space for wheelchairs are sufficient and already cater for the requirements of this proposal as this space is commonly used by prams even when occupied by a wheelchair user.
- Providing a second dedicated space will lead to a loss of 2 to 6 seats within the vehicle resulting in the less able bodied and mobility impaired having further to walk inside the vehicle to reach a diminishing number of seats which will lead to an increase in passenger accidents within the vehicle as a result. The provision of the original wheelchair space led to a similar increase in passenger accidents in this area especially for the elderly. The provision of an unnecessary additional dedicated space should not be at the expense of the safety of other passengers especially the elderly as their rights are not being considered by the promoters of this proposal.
- The proposal would reduce the overall attractiveness of the journey by bus for many less able bodied passengers and could result in their travel opportunities being reduced as a result.
- Operators and Local Authorities working together in partnership with passenger groups are best placed to understand the needs and requirements of their passengers, and therefore request the right type of vehicle from bus manufacturers to meet these needs. It does not require additional regulation to meet them. The current regulations are already sufficient.
- Bus manufacturers have indicated there will be technical difficulties especially in smaller vehicles under 11 metres in meeting these requirements.

In conclusion this proposal is unwelcomed by the IRU, operators and bus manufacturers alike and should therefore be unanimously rejected.

---