

Proposal for amendments to UN Regulation No. 58 (Rear underrun protection)

Note: The text reproduced below was prepared by the International Road Transport Union (IRU) to inform GRSG about the road transport sector's point of view concerning the strengthening of the requirements for rear underrun protection devices, and to propose an amendment to the new paragraph 16.7. proposed by Germany in ECE/TRANS/WP.29/GRSG/2015/17.

I. Proposal

In the proposal by Germany, a new paragraph 16.7. was introduced to read as follows:

Insert a new paragraph 16.7., to read:

"16.7. Given the provisions of paragraph 7.2. for adjustable RUPD the label shall be placed clearly and permanently visible at the rear area of the vehicle next to the RUPD, at a location, which is easily visible."

II. IRU observations and proposal

If the label must be present upon type approval of the vehicle at the rear area of the vehicle next to the RUPD and clearly visible, this would mean that such requirement must be met at all times. Such a requirement is impossible to fulfil, as commercial vehicles are a working tool, and the label cannot withstand all weather and handling conditions while delivering goods to customers. Such a requirement would certainly impact commercial vehicle operators negatively upon roadside and periodical inspections.

Therefore, the inserted new paragraph 16.7. should be deleted, as the information on the label does not enhance safety measures. The information on the operation of adjustable RUPDs could be included in the vehicle's user manual instead, in the same way as various other vehicle systems.

III. Justification

The proposal by Germany to insert a new paragraph 16.7. might create an additional burden on road transport operators without increasing road safety. The IRU considers that the advanced technologies of tomorrow (AEBS) designed to avoid or mitigate (rear impact) incidents should be taken into account, instead of implementing stronger/heavier mechanical solutions. The IRU believes that M₁ road users should pay much more attention to road traffic rules and HGV users are not responsible for M₁ drivers' behaviour and speed. M₁ drivers should be adequately trained and informed about relevant road safety risks.

The IRU cannot support the German proposal and thinks that it would be more appropriate to address the issue with measures and existing technologies to mitigate and/or avoid any rear impact.

GRSG experts are requested to carefully consider the IRU's arguments before making a final decision.