

**OICA's concerns**  
**about the proposal for mandatory installation of side retro reflectors on all vehicles**

The proposal ECE/TRANS/WP.29/GRE/2009/52 transmitted by the expert from Canada introduces new requirements for the mandatory installation of side retro reflectors on all vehicles.

Based on the justification of document ECE/TRANS/WP.29/GRE/2009/52 OICA has the following concerns and wants to show that the arguments for a mandatory installation of side retro reflectors are not strong enough to justify these new requirements.

OICA response to the arguments of the justification:

- 1) "At night or under other dark ambient light conditions, when a vehicle has its lights OFF and is parked on the road ..."  
OICA Comment: It is required by national use requirements and also by the Vienna Convention (Article 32) that between nightfall and dawn the presence of power driven vehicles standing or parked on a road shall be indicated by front and rear position lamps or parking lamps. Therefore the described situation should normally not occur.
- 2) "... in the spaced angled or perpendicular to the direction of traffic flow ... "  
OICA Comment: It is not allowed by national use requirements to park perpendicular to the direction of traffic flow – except in separate marked areas as parking space where no risk exists that the vehicle is not recognized as an obstacle. Therefore the described situation should normally not occur.
- 3) "... or is disabled after collision and blocks the traffic lane(s), it is imperative that it is marked to prevent other vehicle colliding with it and causing fatalities, injuries and/or damage to vehicles."  
OICA Comment: After collision or an accident the driver is obliged to switch on the hazard warning signal (automatic activation is also allowed after a crash according to ECE-R 48 Par. 6.6.7.) and to put a warning triangle on the road. Therefore the described situation should normally not occur. The vehicle will be visible from the side when the hazard warning signal is activated.
- 4) "The proposed amendment should not create a major technological problem as present day retro reflecting devices come in all shapes and forms and do not require complex mounting fixtures."  
OICA Comment: It is not possible to install side retro reflectors on existing vehicles models without expensive and complicated tool modifications. For such an installation on new types of all vehicles transitional provisions would be necessary.

Finally, OICA notes that the justification does not include any evidence that mandatory installation of side retro reflectors on all vehicles provide a safety benefit to road users.