

Transmitted by the expert from OICA

Global Road Safety

OICA Manifesto

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1. OICA – The International Organisation of Motor Vehicle Manufacturers

The International Organisation of Motor Vehicle Manufacturers (OICA) is the world federation of 38 national auto industry associations, spread all over the world. Through these associations, OICA represents almost all vehicle manufacturers worldwide and is the officially accredited representative at the United Nations. OICA actively contributes to the activities of the UNECE World Forum on Harmonisation of Vehicle Regulations (WP.29) and its various working parties.

2. Road Safety – a global problem

Road traffic injuries continue to represent a major public health problem. As noted in UN Resolution 72/271 of 12 April 2018, more than 1.3 million people are killed, and 50 million people are injured in road crashes every year. 90% of these casualties occur in developing countries. Road traffic crashes are the leading cause of death around the world for children and young people between 15 and 29 years of age.

The huge majority of road traffic deaths and injuries are preventable and remain a major public health and development problem, with broad social and economic consequences.

3. An integrated approach to improve road safety in the most efficient way

The global motor vehicle industry, as represented through OICA, is strongly dedicated to the improvement of road safety worldwide.

Road safety is however a complex phenomenon, involving a combination of various factors and stakeholders, interacting with each other. These factors and stakeholders include road user training, education and behaviour, road and repair infrastructure, road traffic rules and their enforcement, efficient medical care system, progress in the analysis of accidents' causation and their consequences, vehicle fleet age and composition, vehicle design, etc. Isolating one of these factors, while neglecting the others, will not yield the hoped-for benefits: road safety calls for an "integrated approach", involving all stakeholders.

OICA strongly supports an integrated approach for road safety, involving all factors (road safety management, road infrastructure, road user behaviour, traffic rules' enforcement, safer vehicles...). Such integrated approach must not be contradicted by attempts to single out individual factors.

OICA recommends that the experience gained in developed countries, where such an integrated approach has resulted in unprecedented levels of road safety despite a high concentration of traffic, be put to good use in emerging countries.

OICA therefore also fully supports the recent UN Resolutions 70/260 and 72/271 on "Improving global road safety" as they address most of the parameters that need to be taken into account. More specifically, Resolution 72/271 also calls, in its Paragraph 10, for a holistic approach.

4. What can the auto industry do to improve road safety?

The global motor vehicle industry recognises that it cannot readily influence all parameters involved in road safety and that its direct responsibility is with vehicle design and safety performance. Based on this recognition, OICA has published a position paper at the occasion of the 2nd Global High Level Conference on Road Safety, hosted by the Government of Brazil in November 2015. *(This paper is available on the OICA website - see <http://www.oica.net/wp-content/uploads/Global-Road-Safety-OICA-position-paper.pdf>).*

In this paper, OICA called on all governments worldwide to place all actors in the auto industry on an equal competitive footing by setting compulsory minimum vehicle safety performance requirements for all new vehicles sold on their territory. Experience in well-developed markets has shown that safety legislation preserves the principles of free and open competition, to the benefit of all road users. This experience should be put to good use also in other countries. OICA however cautions that focusing only on new vehicles' specifications totally disregards the need to accelerate the renewal of the vehicle fleets, which can be extremely old especially in emerging countries; it also totally disregards the sometimes very specific local conditions for road and repair infrastructure, road user behaviour, and traffic composition

5. Vehicle design

The design of vehicles on the road is one of the important factors in road safety. Modern vehicles are much safer than the ones they have replaced over time. Under similar accident conditions, occupants or other road users are much more effectively protected with modern vehicles compared to older models.

This improvement is due to various advances in research that have led to changes in design from the vehicle structure as a whole, enhancing energy absorption capabilities, to specific occupant protection systems such as increasingly sophisticated safety belts and airbags, etc. Not only do modern vehicles perform much better in case of an accident, they are also much better equipped to avoid the accident altogether. Through advances in crash avoidance technology vehicles are increasingly able to effectively brake, remain in a lane and provide effective lighting of roadways to help reduce the risk of an accident.

6. How can the vehicle design be influenced positively?

The OICA position paper published end of 2015 contains a number of public policy recommendations. If these are taken into account, vehicle manufacturers worldwide would support, and are indeed fully prepared to cooperate in the elaboration of mandatory performance requirements for vehicles, based on international regulations, especially those developed under the United Nations 1958 Agreement or their equivalent, such as the Global Technical Regulations under the UN 1998 Agreement, or such as the vehicle requirements existing in well-developed markets (e.g. North America and others).

In its Resolution 72/271 (Paragraph 9), the United Nations invites all Member States to adopt and implement UN vehicle safety regulations or equivalent national standards and OICA repeats its full support to such efforts

OICA understands that the direct responsibility of vehicle manufacturers rests with vehicle design and performance, and OICA therefore supports the necessity to lay down the necessary

legislation in various regions, where such legislation is not already in place or needs improvement.

As a matter of fact, OICA and its industry experts are at the disposal of national and/or regional authorities needing help in the setting up of such national legal requirements.

7. Legal requirements suggested by OICA

In order to place all actors on an equal footing, governments worldwide should use the experience gained in a number of well-developed markets, to set minimum vehicle safety standards for all new vehicles sold on their territory.

In the following annex, the OICA proposal makes several recommendations toward the various governments as to the type of legislation that could or should be in place, as well as a suggested timeframe, taking into account technical, logistic, and commercial constraints. The lead times recommended by OICA for the various legislative measures indicated here below are to be understood as a reference, based on technical considerations.

An in-depth consultation with all actors present on the various national or regional markets will need to be conducted when planning the implementation of various pieces of legislation, in order to take into account the above considerations.

OICA points out that several items should be considered in this determination:

- a) A careful study of the exact needs of a population must first of all be conducted in order to determine the kind of vehicle requirements most suitable to address the real problem in a given territory. Due consideration must also be given to local conditions, including infrastructure. Content and implementation of proposed new requirements should have input from all local stakeholders, including the local industry and importers, in order to ensure fair and adequate treatment to all, without disrupting the whole vehicle supply chain. Lead-time is needed in many cases, as well as consideration of the local logistics and administration.
- b) National or regional vehicle requirements should be based on international regulations developed under the UNECE framework of WP.29 (World Forum on Harmonisation of Vehicle Regulations) and its 1958 and/or 1998 Agreements, or their equivalent such as the requirements existing in well-developed markets (North America, Japan, China, ...).

The vehicle manufacturers should then be able to decide which set of regulations they will fulfil depending on the market (ECE / USA / Japan / China ...) for which the vehicle has been developed originally.

It is up to the governments to decide, but once alternative requirements are accepted by the governments, then their use must be at the choice of the manufacturer

- c) OICA cautions against so called "cherry-picking", a practice where certain requirements are selected from different regulatory regimes. Such a practice would preclude existing vehicle concepts developed as a whole for these regimes and would require specific, unique new developments.
- d) The scope of each of the requirements (UN Regulations, GTRs, FMVSS standards, others) must be respected. Governments should avoid imposing requirements on vehicle categories for which the said requirements are unfit.
- e) Local conditions may suggest a gradual and incremental application of the various levels of severity of legislation until they warrant moving up towards more severe/the latest levels. One of the main concerns with the existing vehicle fleets is their age and

the sometime flagrant lack of proper maintenance and repair infrastructure. New vehicles replace the existing old fleets only very slowly, and care should be taken that this slow process is not slowed down even more due to unrealistic requirements that increase the costs to the consumers, thereby often postponing or even preventing purchasing decisions goals.

- f) The attached list constitutes the global auto industry recommended minimum legal requirements that governments worldwide should set in place as the minimum requirements that vehicles put on their market should meet in order to be legally registered. Vehicles meeting higher/later levels of requirements must obviously be automatically be considered as meeting the lower/earlier levels.
- g) To the widest extent possible, governments should consider joining the United Nations' activities under Working Party 29 and the 1958 Agreement. By doing so, they would benefit from the expertise and the experience gained in other countries. They also would be able to contribute to shaping the evolution of vehicle legislation to ensure that international regulations are suitable for their own needs and can be applied in their territories.
- h) Unique national requirements should be avoided. It is highly unlikely that a single country would be faced with a unique situation that has not already been addressed in other countries.
- i) Some coordination between neighbouring countries will be very useful, whenever possible, in order to streamline the available resources, both from an industrial and an administrative point of view, in order to identify the common safety needs and their remedies.
- j) Finally, there are a small minority of vehicles which need to be exempted, or for which the national legislation requirement ought to be delayed, due to local considerations, or due to the difficulties unique to some vehicles; these exceptional cases need to be negotiated between governments and the auto industry during the national legislation process of adopting the listed requirements into domestic laws.

8. Conclusion

In conclusion, OICA strongly believes that all actors have an important role to play and have to take their own responsibilities in order to achieve a better road safety situation.

Based on this approach authorities can help the vehicle industry by ensuring all manufacturers are placed on an equal footing, through imposing the legal requirements appropriate for their local conditions, and OICA is fully prepared to cooperate in such process.

OICA indeed wants to set up a constructive dialogue with various authorities around the world in order to put in place the necessary vehicle legal requirements where they do not exist or where they are inadequate.

List of potential requirements that should be part of the legal framework in all countries worldwide

General comments that must be taken into account:

1. The list below addresses light vehicles, commercial vehicles (light, medium and heavy), buses and coaches. Details on the applicable vehicle categories are defined in the respective requirements.
2. The list below constitutes the global auto industry recommended **minimum** legal requirements that governments worldwide should set in place as the minimum requirements that vehicles put on their market should meet in order to be legally registered. Vehicles meeting higher/later levels of requirements must obviously be automatically be considered as meeting the lower/earlier levels.
3. Other alternative requirements, when acknowledged, are at the choice of the OEM. It is up to the governments to decide which requirements are equivalent to the UN R or the GTR, but once alternative requirements are accepted by the governments, then their use must be at the choice of the manufacturer.
4. The scope of each of the requirements (UN Regulations, GTRs, FMVSS standards, others) must be respected. Governments should avoid imposing requirements on vehicle categories for which the said requirements are unfit.

I. Light vehicles (passenger cars, light duty vehicles – for definitions, see UN Consolidated Resolution R.E.3, FMVSS standards, ...)

Subject	Requirement	Leadtime for implementation (in months after promulgation of the law)	Explanation
Brakes incl. ABS installation	R 13H.00 FMVSS 135 or other well-established requirements are to be considered as equivalent. In addition, installation of ABS, as specified e.g. in Annex 6 to UN R13H.00	36 Months	ABS installation is currently not mandated by UN R13H or FMVSS 135. The installation of ABS should therefore be a separate, additional requirement that the auto industry can fully accept.

<p>ESC, including its installation</p>	<p>UN R 140.00, GTR 8, Supplement 7 to UN R13H.</p> <p>In addition, installation of ESC needs to an additional separate requirement.</p> <p>FMVSS 126 or other well-established requirements are to be considered as equivalent.</p>	<p>60 Months</p>	<p>ESC installation is, strictly speaking, currently not mandated by UN R140, even though the technical specifications are included. The installation of ESC should therefore be a separate, additional requirement that the auto industry can fully accept.</p> <p>FMVSS 126 however foresees mandatory installation</p> <p>Also Supplement 7 to UN R13H needs to be added as equivalent alternative since this originally contained the ESC specifications which are still valid.</p>
<p>Safety belt anchorages</p>	<p>Level of UN R14.05 for all seats, except for the centre rear seat, where 2 lower anchorage points should remain allowed (3rd, upper point would remain optional).</p> <p>FMVSS 210 or other well-established requirements are to be considered as equivalent</p>	<p>24 Months</p>	<p>The main problem relates to the number of belt anchorages on the centre rear seat. Some vehicles produced locally in emerging markets still have only 2 anchorage points on the rear centre seat (compatible with a 2-point lap belt) and requiring 3 anchorages points would entail serious structural adaptation, and therefore longer time.</p> <p>There are also administrative issues, since official approval to UN R14.05 cannot be obtained anymore unless 3 anchorage points are installed.</p> <p>OICA therefore suggests for the time being that the legal requirements foresee <u>the level of UN R14.05</u> for all anchorages (e.g. based on a test report), while 2 anchorage points on the centre rear seat remain allowed for some more time. The complete switch to UN R14.05 (or equivalent or even higher versions) could occur at a somewhat later stage, to be reviewed locally.</p>

Safety belts	<p>Level of UN R16.04 for all seats, except for the centre rear seat where 2-point lap belts should remain allowed (3-point belts are obviously allowed).</p> <p>FMVSS 209 or other well-established requirements are to be considered as equivalent.</p>	36 Months	<p>As for the number of anchorage points, the main problem relates to the type of seat belt on the centre rear seat. Some vehicles produced locally in emerging markets still have only 2 anchorage points on the rear centre seat and therefore can only be equipped with a 2-point lap belt on that seat.</p> <p>There are also administrative issues, since official approval to UN R16.04 cannot be obtained anymore unless 3-point seat belts are installed on all seats.</p> <p>OICA therefore suggests for the time being that the legal requirements foresee <u>the level of UN R16.04</u> for all seat belts (e.g. based on a test report), while 2-point lap belts on the centre rear seat remain allowed for some more time in case only 2 lower anchorage points are foreseen. The complete switch to UN R16.04 (or equivalent or even higher versions) could occur at a somewhat later stage, to be reviewed locally.</p>
Seats/Head restraints	<p>UN R 17.07, GTR 7.</p> <p>FMVSS 202 or other well-established requirements are to be considered as equivalent</p>	36 Months	
Frontal collision	<p>UN R94.01</p> <p>FMVSS 208 or other well-established requirements are to be considered as equivalent</p>	36 Months	
Lateral collision	<p>UN R95.02</p> <p>FMVSS 214 or other well-established requirements are to be considered as equivalent.</p>	36 Months	

Tyres	<p>Vehicles put on sale should be fitted with certified tires, as per UN R 30.02, UN R54, or meeting GTR 16</p> <p>FMVSS 139, FMVSS 109 or other well-established requirements are to be considered as equivalent</p>	12 Months	<p>It should be clear that this is only for tyres as fitted on the vehicle put on sale. OEMs cannot be held responsible for the aftermarket.</p> <p>In addition, UN R30 or UN R54 do not cover installation. The requirement should therefore be spelled out as requiring vehicles put on sale to be fitted with certified tires.</p> <p>UN R30 and UN R54 are not restricted to specific vehicle categories: a heavy passenger car can use truck tires and the other way around a light van can use car tires. UN R30 or UN R54 should therefore be considered as interchangeable.</p>
Safety glazing	<p>UN R43.00</p> <p>FMVSS 205 or other well-established requirements are to be considered as equivalent.</p>	24 Months	
Installation of lighting	<p>UN R48.03</p> <p>FMVSS 108 or other well-established requirements are to be considered as equivalent.</p>	36 Months	

II. Commercial vehicles (light, medium, heavy, including buses and coaches) – for definitions, see UN Consolidated Resolution R.E.3, FMVSS standards, ...)

In many cases, the vehicle manufacturers develop and produce so-called "chassis-cabs and bus chassis" which are then further completed by third party "body-builders" before being placed on the market, based on customer specifications.

The list below therefore constitutes the OICA recommendation as to the requirements that could be imposed nationally, but in some cases OICA is unable to give any recommendation as to the timing. Governments are therefore invited to consult with local stakeholders.

Subject	Requirement	Leadtime for implementation (in months after promulgation of the law)	Explanation
Brakes incl. ABS installation	<p>UN R13.10 or R 13H.00 (depending on the vehicle category)</p> <p>FMVSS 121, FMVSS 105, FMVSS 135 (depending on the vehicle category) or other well-established requirements are to be considered as equivalent.</p> <p>In addition, installation of ABS, as specified e.g. in Annex 6 to UN R13H.00</p>	36 Months	<p>For some vehicle categories, ABS installation is currently not mandated by UN R or FMVSS requirements.</p> <p>The installation of ABS should therefore be a separate, additional requirement that the auto industry can fully accept. Sufficient lead time is however necessary considering the complete development up to certification and production process</p>
Tyres	<p>Vehicles put on sale should be fitted with certified tires, as per UN R 30.02, UN R54, or meeting GTR 16 (depending on the vehicle category)</p> <p>FMVSS 119, 139, FMVSS 109 (depending on the vehicle category) or other well-established requirements are to be considered as equivalent</p>	12 Months	<p>It should be clear that this is only for tyres as fitted on the vehicle put on sale. OEMs cannot be held responsible for the aftermarket.</p> <p>In addition, UN R30 or UN R54 do not cover installation. The requirement should therefore be spelled out as requiring vehicles put on sale to be fitted with certified tires.</p> <p>UN R30 and UN R54 are not restricted to specific vehicle categories: a heavy passenger car can use truck tires</p>

			and the other way around a light van can use car tires. UN R30 or UN R54 should therefore be considered as interchangeable, depending on the vehicle category.
Safety belt anchorages	UN R14.05 FMVSS 210 or other well-established requirements are to be considered as equivalent		Timing will need to be reviewed also with third party body-builders
Safety belts	UN R16.04 FMVSS 209 or other well-established requirements are to be considered as equivalent.		Timing will need to be reviewed also with third party body-builders
Safety glazing	UN R43.00 FMVSS 205 or other well-established requirements are to be considered as equivalent.		Timing will need to be reviewed also with third party body-builders
Devices for indirect vision	R 46.01 FMVSS 111 or other well-established requirements are to be considered as equivalent		OICA fully agrees that installation of rear view mirrors is an obvious must for road safety. UN R46.01 (or its equivalents) would be a good step to bring safety benefits in many countries, without going to the high complexity of later versions of UN R46. Timing will however need to be reviewed also with third party body-builders
Installation of lighting	UN R48.03 FMVSS 108 or other well-established requirements are to be considered as equivalent.		Timing will need to be reviewed also with third party body-builders