

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) was founded in 1919 and currently gathers 36 trade associations around the world, including almost all major automobile manufacturing countries in Europe, America, Africa and Asia. OICA is the only non-governmental car and truck manufacturers' organization accredited to the United Nations and represents the technical interests of the global auto industry in international institutions and organizations.

The OICA activities contribute to the worldwide diffusion of technology, experience and know-how, to the benefit of all countries. OICA coordinates the global harmonization of vehicle regulations. The member associations are committed to the improvement of road safety and environmental protection, and they actively contribute to the global harmonization of technical regulations and standards.

OICA also collects and publishes international statistics and coordinates the yearly calendar of motor shows in its member countries.

2. Road Safety – a global problem

Road traffic injuries continue to represent a major public health problem. As noted in several UN Resolutions, e.g. 75/308 of 21 July 2021, road crashes kill more than 1.35 million people and injure 50 million people a year, with 90% of these casualties occurring in developing countries.

The United Nations proclaimed the period of 2021-2030 as the Second Decade of Action for Road Safety, aiming at strongly reducing these road traffic deaths and injuries, which are a major public health and development problem, with broad social and economic consequences. In this publication, OICA wishes to contribute and makes some recommendations in order to improve global road safety, with the focus on the word "global", considering that much has already been achieved in developed countries, while much needs to be done in developing countries.

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, 72/271 and 74/299 on "Improving global road safety" as they address most of the parameters that need to be considered. These Resolutions clearly call for governmental action in a holistic, integrated approach, looking at all parameters and putting in place legislation as needed.

4. Vehicle design

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.

The design of vehicles on the road is one, but only one, of the important factors in the integrated approach towards improved 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.

5. How can the vehicle design be influenced positively?

OICA members since several years consider that the most efficient way to improve the safety performance of the totality of the vehicles put on the respective markets in the various countries rests on vehicle legislation. This strategy ensures that all manufacturers present in the respective markets must meet the law and are not allowed to sell vehicles not meeting the legal requirements. In other words, all manufacturers are placed on equal footing and free competition is safeguarded, to the full benefit of the consumers

OICA therefore strongly calls 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, especially those where current legislation is clearly inadequate or even non-existing.

Vehicle manufacturers represented in OICA are convinced that this approach is most efficient on a global scale: the legal requirements apply to all as a minimum limit and each manufacturer would obviously be free to meet higher standards. In addition, New Car Assessment Programmes (NCAP), as already existing in many markets, may give an additional impetus.

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. (<http://www.oica.net/wp-content/uploads/Global-Road-Safety-OICA-position-paper.pdf>).

This paper contains a number of public policy recommendations. If these are considered, 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).

This strategy is also fully in line with the various UN Resolutions and recommendations of the UNECE Inland Transport Committee, calling for government legislative action to implement safety requirements on vehicles. OICA repeats its full support to such efforts

OICA however considers that the introduction of new vehicle legislation needs to be done with caution, in order to avoid that increased costs slow down the often much needed vehicle renewal; consideration also needs to be given specific local conditions, such as road and repair infrastructure, road user behaviour, traffic composition, etc.

6. Legal requirements suggested by OICA

In the following annex, OICA 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, considering 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.

It should also be noted that the following annex updates and replaces the one for light vehicles published in 2019; new and updated requirements have been added, in consultation with the various vehicle manufacturer experts, and the proposed lead-times have been reduced, sometimes very drastically, in an effort to speed up the process.

7. How can such vehicle legislation be put in place?

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.

Putting in place national or regional legislation as recommended by OICA does not necessarily constitute a heavy burden on administrative services. There is indeed no need for authorities to become signatory to the UN Agreements in place, such as the 58 and/or 98 Agreements (even though such move would be strongly recommended), and it would suffice to simply implement laws requiring vehicles sold in their respective markets to meet the requirements specified in these Agreements. In other words, though joining the UN Agreements such as the 58 or 98 Agreements is recommended, not doing so cannot prevent governments to implement the requirements of these Agreements.

8. What needs to be considered when putting legislation in place?

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 alternatively on other well established 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 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.

9. 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 considered:

1. The list below addresses light vehicles in general. Details on the applicable vehicle categories are defined in the respective requirements. The proposed requirements for light vehicles are an update of those proposed in 2019.
2. The list below constitutes the global auto industry recommended minimum legal requirements that vehicles put on the market should meet in order to be legally registered. Vehicles meeting higher/later levels of requirements must obviously automatically be considered as meeting the lower/earlier levels.
3. The purpose is not to introduce or replace requirements in well developed markets where the current legislation is already well established. Instead, the focus of this manifesto is towards countries and regions where the vehicle legislation is clearly inadequate or even inexistent.
4. Other alternative requirements, when acknowledged, are at the choice of the OEM. It is up to the governments to decide which requirements are to be considered as alternative to the UN Regulation under the 1958 Agreement or the Global Technical Regulation under the 1998 Agreement, or under other regulatory regimes. Once alternative requirements are accepted by the governments, then their use must be at the choice of the manufacturer.
5. 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.
6. Lead-time: when setting up the requirements, governments should consider the industry constraints in terms of:
 - Need to re-design some concepts
 - Need to obtain the respective administrative certification, if so required
 - Need to adapt the logistics (supply chain for components)
 - Need to adapt assembly lines

In most cases at least 24 to 36 months will therefore be needed between the publication of the law and its actual implementation for all vehicles sold on the respective markets. These suggested lead-times are to be seen as guidelines and in some cases, more time will be needed depending on the requirements and on the vehicle(s). In some cases, depending on market, the requirements, the vehicle types involved, etc, the lead-times might on the other hand be reasonably shortened in consultation with the local stakeholders.

It should also be clear that the lead times here below, accepted by the vehicle manufacturers, are based on normal business conditions, e.g. without extreme disturbances in the supply chain or other exceptional circumstances.

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)	Remarks
Brakes including ABS - Antilock Braking System	Where needed, governments should promulgate laws to require all new light vehicles put on sale on their market to be equipped with <ul style="list-style-type: none"> • Brakes meeting the requirements of UN R13H or FMVSS 135 or other well-established requirements • Anti-lock Brake System (ABS) meeting the specifications foreseen in these respective regulations/standards 	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. Some vehicles still in production however would need re-design and logistics (supply chain and assembly lines) need re-organisation/adaptation, therefore some time will be needed.
ESC - Electronic Stability Control	Where needed, governments should promulgate laws to require all new light vehicles put on sale on their market to be equipped with an Electronic Stability Control system (ESC) meeting the specifications foreseen in UN R 140, or GTR 8, or FMVSS 126 or other well-established requirements	36 Months	Similar to ABS (see above), some vehicles still in production would need re-design and logistics (supply chain and assembly lines) need re-organisation and adaptation In addition, ESC and ABS are often offered as a package; therefore, the lead-times for ABS and for ESC installation should best be aligned.

Safety belts and their anchorages	<p>Where needed, governments should promulgate laws to require all new light vehicles put on sale on their market to be equipped with:</p> <ul style="list-style-type: none"> • Safety belts meeting the requirements foreseen in UN R16, or FMVSS 208 and 209 or other well-established requirements. The required type of belts depending on the seating position in the vehicle should be in line with the requirements of these existing regulations/standards • Anchorages suitable for these safety belts and meeting the requirements of UN R14, or FMVSS 210, or other well-established requirements 	24 Months	
Seats/Head restraints	<p>Where needed, governments should promulgate laws to require all new light vehicles put on sale on their market to meet the requirements foreseen in UN R17.07, or GTR 7, or FMVSS 202, or other well-established requirements</p>	24 Months	
Frontal collision	<p>Where needed, governments should promulgate laws to require all new light vehicles put on sale on their market to meet the requirements foreseen in UN R94.01, or FMVSS 208, or other well-established requirements</p>	24 Months	<p>A phased-in approach could also be considered at the choice of the manufacturer as follows:</p> <ul style="list-style-type: none"> • 25% of vehicle sales as from 12 months after promulgation of the law • 50% of vehicle sales as from 24 months after promulgation of the law • 100% of vehicle sales as from 36 months after promulgation of the law

Lateral collision	Where needed, governments should promulgate laws to require all new light vehicles put on sale on their market to meet the requirements foreseen in UN R95.02, or FMVSS 214, or other well-established requirements.	24 Months	A phased-in approach could also be considered at the choice of the manufacturer as follows: <ul style="list-style-type: none"> • 25% of vehicle sales as from 12 months after promulgation of the law • 50% of vehicle sales as from 24 months after promulgation of the law • 100% of vehicle sales as from 36 months after promulgation of the law
Tyres	Where needed, governments should promulgate laws to require all new light vehicles put on sale on their market to be equipped with tires meeting the requirements of UN R30.02, or UN R54, or GTR 16, or FMVSS 139, or FMVSS 109, or other well-established requirements.	12 Months	
Safety glazing	OICA suggests that, where needed, governments promulgate laws to require all new light vehicles put on sale on their market to be equipped with glazing meeting the requirements of UN R 43, or GTR 6, or FMVSS 205, or other well-established requirements	24 Months	As an alternative, a phased-in approach at the choice of the manufacturer could also be considered as follows: <ul style="list-style-type: none"> • 50% of vehicle sales as from 12 months after promulgation of the law • 100% of vehicle sales as from 24 months after promulgation of the law
Installation of lighting	OICA suggests that, where needed, governments promulgate laws to require all new light vehicles put on sale on their market to be equipped with lighting and light signalling meeting the requirements of UN R 48.03, or FMVSS 108, or other well-established requirements. FMVSS 108 or other well-established requirements are to be considered as equivalent.	24 Months	

Rear view mirrors	OICA suggests that, where needed, governments promulgate laws to require all new light vehicles put on sale on their market to be equipped with rear view mirrors/devices for indirect vision meeting the requirements of UN R 46, or FMVSS 111, or other well-established requirements.	24 Months	
ISOFIX anchorages for Child Restraint Systems	OICA suggests that, where needed, governments promulgate laws to require all new light vehicles put on sale on their market to be equipped with ISOFIX anchorages for child restraint systems, meeting the requirements foreseen in UN R145 or FMVSS 225, or other well-established requirements.	24 Months Some vehicle designs however may need additional time due to the need to adapt the structure	Governments however in this case must ensure the wide-spread availability of Child Seats compatible with these anchorages, otherwise no safety improvement can be expected at all. The ISOFIX anchorages in the vehicles indeed can only be used by new generation child restraint systems.
Pedestrian protection	Pedestrian protection requirements on the basis for UN R127 or GTR 9 or other similar requirements are clearly an important element that will need to be considered.	TBD	There are major hurdles and technical challenges to be overcome before these requirements can be recommended on a <u>global</u> scale. Industry would not oppose and will support national governments in the implementation of Pedestrian Protection requirements based on their national situation and vehicle fleets and possibly using a phased-in approach for the implementation of the final requirements. Fact is that even some well-developed markets currently do not yet have any requirement along the lines of UN R127 or GTR 9. Therefore, a significant portion of the current vehicle production and sales was not developed for these requirements and would need complete re-design.

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	UN R13.10 or R 13H.00 (depending on the vehicle category) FMVSS 121, FMVSS 105, FMVSS 135 (depending on the vehicle category) 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	For some vehicle categories, ABS installation is currently not mandated by UN R or FMVSS requirements. 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
Tyres	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) FMVSS 119, 139, FMVSS 109 (depending on the vehicle category) or	12 Months	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. 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.

	other well-established requirements are to be considered as equivalent		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, 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