Submitted by the experts from CLCCR and OICA

Informal document GRSG-130-18
(130th GRSG, 6–9 October 2025
Agenda item 16(k))

**CLCCR and OICA statement regarding the adoption of GRSG-129-21-Rev.5 in the 129th session of GRSG, which is now scheduled for voting at WP.29 in November 2025.**

While the industry acknowledges the efforts of Japan, France, and the wider Working Party to enhance sideguard (LPD) safety, we remain concerned that these amendments have not fully considered the needs of wider markets and could negatively impact a significant portion of commercial vehicles and 'Combined Transport Systems', especially in Europe[1].

It is noted that Japanese national requirements have set sideguard maximum height at 450mm for around 40 years; it is also noted that European Union requirements have set sideguard maximum height at 550mm for at least 35 years – and is reflected in UNECE R73.01. It is difficult to compare the situations in Japan and other markets, or decide the optimum height, given the differences in road infrastructure, VRU behaviour, vehicle fleet, and other safety factors.

The adopted proposal, while potentially suitable for the Japanese market, is not aligned with European infrastructure, vehicle diversity, or wider EU societal priorities. One such priority is that of $CO_2$ reduction.

In the European Union, 'combined transport' significantly reduces $CO_2$ emissions by shifting cargo from higher-emission road transport to more efficient rail and sea transport for long-haul segments. These combined transport systems[2] are linked together across the European Union and form an important part of EU decarbonisation policy.

CLCCR and OICA are concerned **that the adoption of GRSG-129-21-Rev.5 will conflict with combined transport specifications**. The profile of railway wagons is specifically designed according to UIC railway standards, and these provide a necessary 'clearance' between the wagon and sideguard when the trailer or vehicle is in its position for carriage. Lowering the sideguard height to 450mm (from 550mm) means there will be direct contact between the sideguard and the wagon. This concern has been confirmed through initial contact with the UIC (International Union of Railways).

Therefore, the adoption of this proposal risks discouraging the use of combined transport solutions, which are a central element of climate decarbonisation strategy. Such an outcome would undermine sustainable mobility by compromising both environmental goals and the promotion of efficient, low-carbon transport modes. CLCCR estimates that approximately 60% of train wagons could be affected, and resolving this infrastructure issue would come at high costs across the EU, for no proven benefits in road safety.

CLCCR and OICA also wish to highlight the broader implications for vehicle design and usability for consumers resulting from this proposal. The lowering of the sideguard and reduction in ramp angle will give reduced flexibility for vehicles and trailer combinations in certain applications (i.e. loading roll-on, roll-off vessels) and conflict with the road surface and local infrastructure (i.e. grounding out), which will lead to damage or reduced life of sideguards.

---

[1] https://transport.ec.europa.eu/transport-themes/logistics-and-multimodal-transport/multimodal-and-combined-transport_en

[2] 2024 Report on Combined Transport, UIC/UIRR / 15.11.2024 - Compiled by SCI Verkehr GmbH, uic_uirr_report_2024-2.pdf

OICA and CLCCR appreciate Japan's commitment to improving road safety for smaller bicycles and recognise the importance of this objective. However, we believe the proposal does not sufficiently account for the operational realities of the wider transport network.

**We encourage Contracting Parties to re-evaluate this proposal, so to ensure the implications for vehicles, combined transport, and climate objectives are fully understood before proceeding further.**

**To that end, OICA and CLCCR respectfully requests that the proposal be withdrawn from the agenda of WP.29, so that a comprehensive review of its impacts within other global markets can be conducted.**