



**NSAI/TC 017/SC 05/WG 03 "Vertical Signs"**

**Irish National Position on the request from WG 3/PT1 on the revision of EN 12899**

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## Road Equipment Technical Standards Committee

**To:** CEN/TC 226/WG 3

Dear Lillian,

In reply to your documents CEN/TC 226/WG 3 N 287 and N 288 this is the Irish position relating to the proposed revisions.

We have not been able to agree a national position based on the options given. We have contacted manufactures, suppliers and the authorities in the drafting of our national position. The difficulty seems to be between the glass bead material manufactures and prismatic material manufactures.

For companies that manufacture the glass bead material only, they are voting for Option 1b). It should be noted that some have plans to develop prismatic technology material in the future. They believe that Option 1b) allows more choice between the glass beaded and prismatic materials within the framework of the existing standard.

For companies that manufacture prismatic reflective materials, they are voting for Option 3.

The major concern among the majority of the members is that Option 3 could phase out glass bead material as a product. This does not align with the principles of standardization. The preferred method for the introduction of new technologies is to retain existing technologies and facilitate entry for new technologies.

There is an eagerness among the authorities to have more choice and they are well aware of the advantages and disadvantages of each of the classes and technologies on the differing road settings and for road users.

We have reservations about the current situation where there is no upper band of performance. This means that high performance retro-reflectors can also be deemed to fill the requirements of lower classes. This means that it is difficult to prevent such materials being used where they are inappropriate. Two wheelers in particular can be susceptible to dazzle on dark wet nights on rural roads with low levels of background lighting and traffic. Less bright class 1 materials can be specified on such roads in order to provide the appropriate level of guidance without dazzle. There is concern that some newer materials may be too bright for such conditions. Suppliers should not be allowed to brand and sell the same high performance material for all classes and the testing and certification regime should reflect this. There should not be a bias for drivers driving on the right hand side of the road.

We note that there exists camera based systems which are now capable of continuous measurement from a moving vehicle and surely they would give a better picture of the performance of different signs rather than measurement from very specific angles which can be targeted by materials manufacturers. Such systems would be much more effective in measuring signs into the future where vehicle camera to sign visibility for self-driving vehicles is a factor.

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There is no appetite among the members to require new or additional testing for established products, already covered by EN 12899, as this will incur costs for testing and CE marking. It would not be practical for the sign producer to test finished road signs according to the standard as this would create significant cost if implemented.

The proposed new test method is closer to real driving scenarios for prismatic materials. Next to observation and entrance angles, now also rotation and orientation angles are adjusted based on sign and vehicle position. This allows for a fair comparison between all types of retro-reflective sheeting. The old test method was fine for glass beaded constructions, but as more different types of prismatic sheeting are being put on the market, a more comprehensive way of testing is required for the prismatic materials.

A limited number of classes will be helpful to cluster the various levels of performance of prismatic materials. As the different types of prismatic sheeting play at the high end of the performance scale, a 3A-3B-3C classification is good if there is sufficient differentiation between these 3 classes.

A wider choice of classes should allow the road authorities and other specifiers to select the best performing solutions where needed. The standard needs to be user friendly for road authorities and specifiers.

However, some manufacturers think that Option 1b) is the best approach in the interim. R3C is not proven to be aligned to a practical driver's scenario, which is currently best represented by CIE TC 4-40.

All member states should choose from the same list of classes. Allowing member states to generate their own classes will generate confusion and could even lead to barriers of trade.

Yours sincerely,

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