



## Guideline

Draft decision on application of article R.313-32-1 of the [French] road traffic act regarding blind spot indications on trucks.

The obligation of displaying blind spot indications as from 1 January 2021 is prescribed by article L. 313-1 of the [French] road traffic act, introduced under article 55 of act n° 2019-1428 of 24 December 2019 regarding directions of movement.

### What vehicles are subject to this obligation?

All vehicles with a maximum gross weight of 3.5 tonnes and over.

### What vehicles are exempt from this obligation?

- forestry and agricultural vehicles;
- salt and grit spreaders, snow shovels;
- (emergency) assistance vehicles of operators of motorways or dual-lane traffic roads;
- Motor vehicles or trailers with a proven impossibility of mounting structures for this purpose are exempt from the obligation of carrying rear or side indications.

**Please note:** This proven impossibility of mounting structures must apply to the defined zones; the zone in question does not contain an element to allow affixation of the display, while no brace or support for affixation may be mounted (as on dolly trailers for instance).

### In what ways may indications be affixed to vehicles?

- Sticking adhesives;
- Riveting;
- All other modes of fastening;
- Painting on to bodywork;
- Sleeves or pockets on bodywork.

### Does this obligation also apply to foreign vehicles?

Yes. With the proviso that vehicles that already display blind spot indications on the rear and sides pursuant to the law of another EU member-state are considered as complying with this demand.

### What about vehicles already equipped with blind spot indications not conforming to the model prescribed by this draft decision?

If the sides and rear-ends of these vehicles carry blind spot indications affixed before 31 March 2021, these are considered as complying with this demand for a period of 12 months after announcement of the decision in the [French] government gazette.

### Where must blind spot indications be positioned?

Indications must be positioned in such a way as to be visible in all circumstances while they must not obstruct the visibility of other mandatory vehicle plates and inscriptions, the various indicators, lighting elements and the driver's view.

### Are there any statutory requirements for positioning blind spot indications?

Yes. Indications must be positioned exactly according to the prescriptions of article 2 of the draft decision.

### I – Motor vehicles

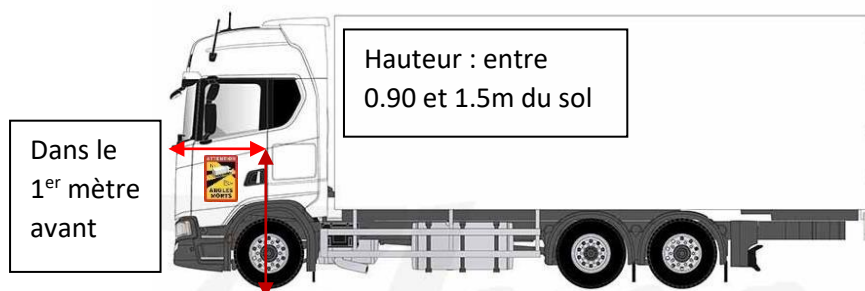
#### A) Carriers

The blind spot indications must be positioned longitudinally on the rear end of the vehicle (between 0.9 and 1.5m above street level) to the right of the right median section, and on either side (not being window screen surface and between 0.9 and 1.5m above street level) within first-metre distance from the vehicle front.

- 1) Rear-end positioning: [in French: Height: between 0.9 and 1.5m above street level]



- 2) Positioning on the sides: [in French, left: Within 1st first-metre distance from vehicle front; in French, right: Height: between 0.9 and 1.5m above street level]



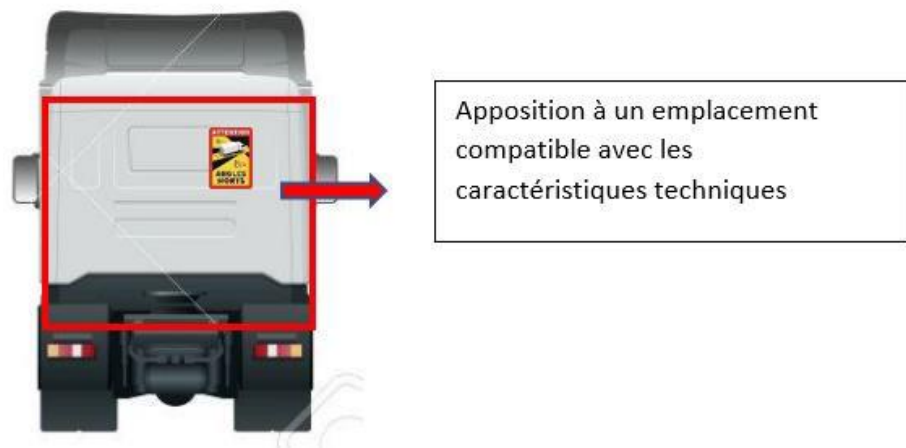


*[In French, left: Height: between 0.9 and 1.5m above street level; In French, right: Within 1st first-metre distance from vehicle front]*

## B) Tractors

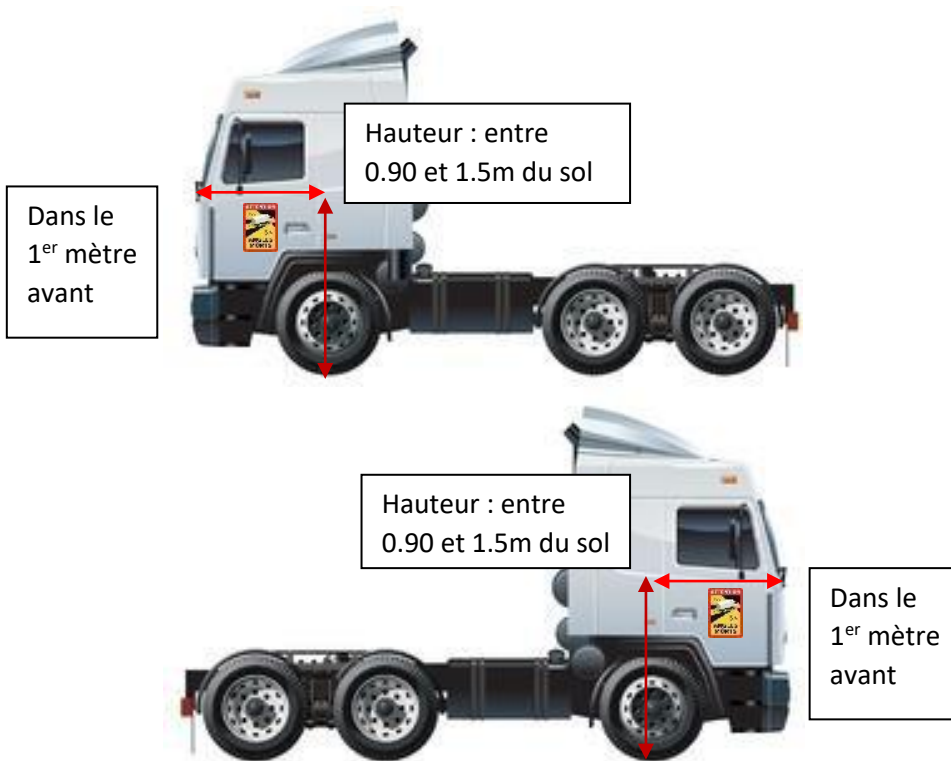
Blind spot indications must be positioned on the rear-end of the vehicle in accordance with the technical features of the vehicle, and on either side (not being window screen surface and between 0.9 and 1.5m above street level) within first-metre distance from the vehicle front.

- 1) Positioning on the sides: *[In French: Positioning according to the technical features of the vehicle]*



- 2) Positioning on the sides:  
*[first picture: in French, left: Within first-metre distance from vehicle front; in French, right: Height: between 0.9 and 1.5m above street level]*

*[second picture: in French, left: Height: between 0.9 and 1.5m above street level; in French, right: Within first-metre distance from vehicle front]*



## II – Tractor/trailer combinations

### A) Trailers

The blind spot indications must be positioned longitudinally on the rear end of the vehicle (between 0.9 and 1.5m above street level) to the right of the right median section, and on either side (not being window screen surface and between 0.9 and 1.5m above street level) within first-metre distance from the vehicle front.

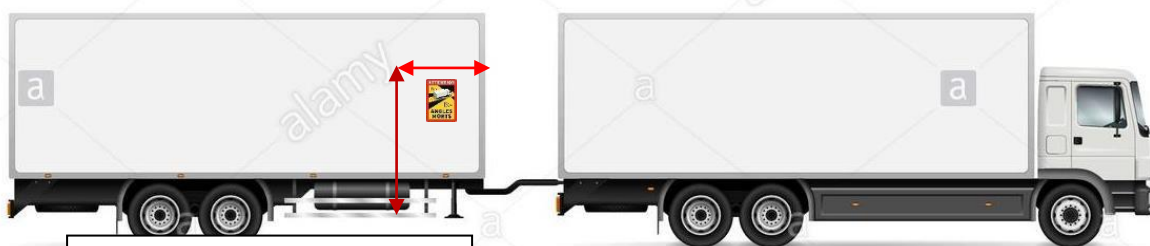
- 1) Positioning on the sides: [In French: Height: between 0.9 and 1.5m above street level]



- 2) Positioning on the sides:



On either side within first-metre distance from the front of the superstructure of the trailer at a height between 0.9 and 1.5m above street level



On either side within first-metre distance from the front of the superstructure of the trailer at a height between 0.9 and 1.5m above street level

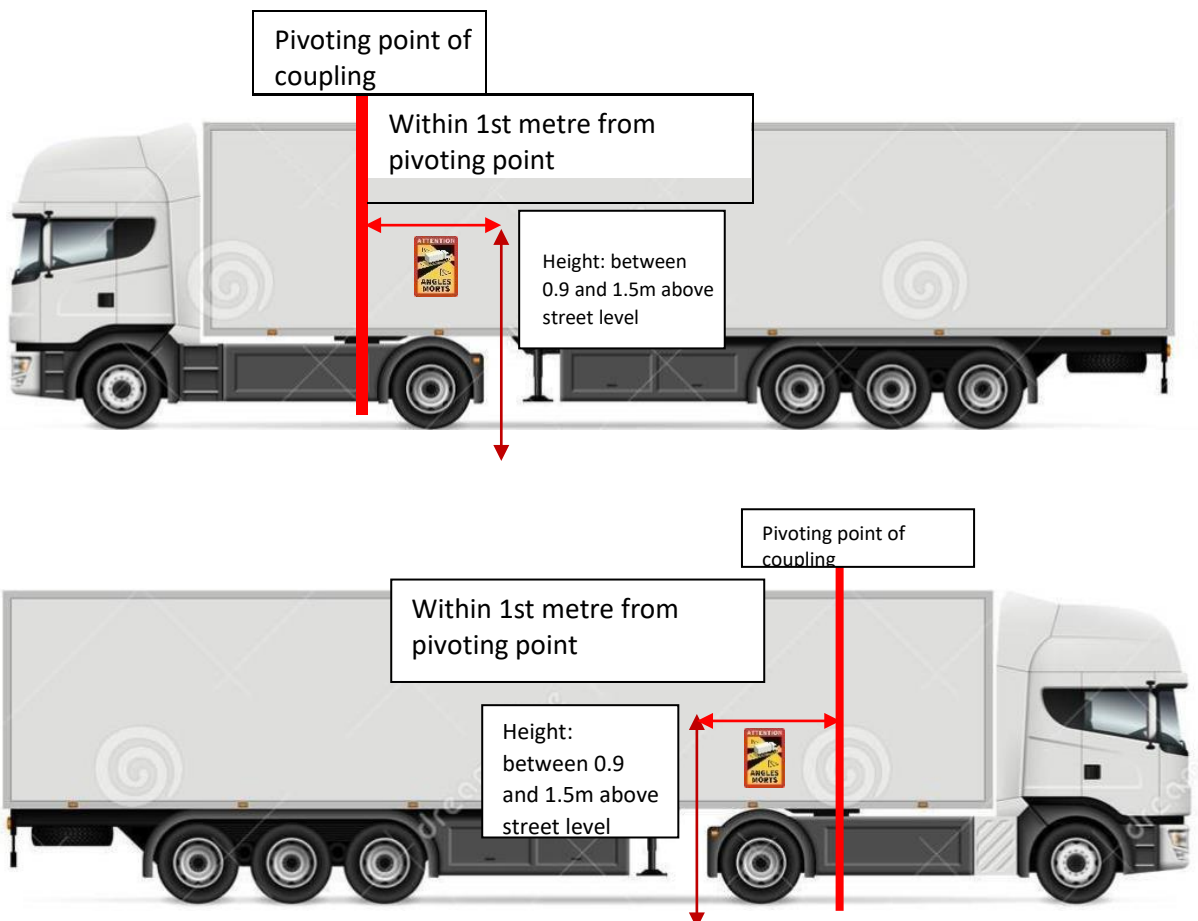
## B) Semi-trailers

The blind spot indications must be positioned longitudinally on the rear end of the vehicle (between 0.9 and 1.5m above street level) to the right of the right median section, and on either side between 0.9 and 1.5m above street level within first-metre distance from the pivoting point of the vehicle coupling.

- 1) Rear-end positioning: [In French: Hauteur: between 0.9 and 1.5m above street level]



- 2) Positioning on the sides:



## Are there any deviations from the mandatory positioning of blind spot indications?

Yes, in the event of technical impossibility.

**Please note:** Technical impossibility means impossibility of positioning blind spot indications within the dimensions prescribed by the draft decision (due to window screen surfaces for instance).

### Deviation from required height positioning:

- Motor vehicles and trailers with a proven technical impossibility preventing compliance with the prescriptions regarding positioning above street level must be equipped with blind spot indications that approach as much as possible the heights prescribed by article 2 of the present draft decision, not exceeding 2.10 metres.

### Deviation from required side positioning:

- Vehicles equipped with elements providing a direct view from the bottom door section or a fully-glazed door must carry blind spot indications in positions approaching as much as possible the distance from the vehicle front prescribed by article 2 of this draft decision, not exceeding 3 metres, unless the construction of the vehicle does not allow positioning of blind spot indications according to the provisions of said article without obstructing part of the view.
- The criteria for side positioning of blind spot indications do not apply to trailers with a technical impossibility for this purpose. These vehicles must be equipped with blind spot indications on either side, positioned in accordance with the technical features of the trailer.

### Deviation of the requirements regarding rear-end positioning:

- The criteria for rear-end positioning of blind spot indications do not apply to motor vehicles and (semi-)trailers with a technical impossibility for this purpose. These vehicles must carry a blind spot indication on the rear, positioned in accordance with the technical features of the vehicle.

Examples (non-comprehensive summary):

- container trailers;
- car transport trailers;
- tractors for trailers;
- tankers;
- flatbed semi-trailers;
- hookarms for detachable backs of trucks;
- dolly trailers.

## Questions / Answers

### 1) What about positioning blind spot indications on curtainsider vehicles?

Repeated (un)folding/(un)rolling of (canvas) tarpaulins will in time impair the condition of stickers. To do something about this problem, the Ministry recommends application of blind spot indications in other ways, like paint-ons, or in a sleeve or pocket.

**2) What about positioning on flatbed vehicles?**

The Ministry takes the view that there is no structural impossibility with regard to this vehicle category. These vehicles however constitute part of vehicles with an implied technical impossibility of positioning blind spot indications within the dimensions prescribed by the draft decision. By consequence, the blind spot indications must be positioned in a way that conforms to the technical features of this vehicle category (like mounting a fixed or detachable support or brace for positioning the blind spot indication).

**3) What about positioning on Ampliroll-hookarm vehicles?**

The Ministry specifically prescribes positioning of blind spot indications on vehicles; not on skips, as these do not constitute part of the vehicle as such.

**4) What about positioning on container vehicles?**

The Ministry specifically prescribes positioning of blind spot indications on vehicles; not on containers, as these do not constitute part of the vehicle as such.

**5) What about positioning on car transport vehicles?**

The Ministry takes the view that these vehicles constitute part of vehicles with an implied technical impossibility of positioning blind spot indications within the dimensions prescribed by the draft decision. By consequence, the blind spot indications must be positioned in a way that conforms to the technical features of this vehicle category.

**6) What about positioning on timber transport vehicles?**

The Ministry takes the view that this vehicle category constitutes part of vehicles with an implied structural impossibility of positioning blind spot indications. Since the trailer chassis is composed of tree trunks, it is the trunks themselves that function as sides, with rear end only functioning as prop for accommodating and securing the trunks. By consequence, this vehicle type is exempt from the duty of carrying blind spot indications.