

Ask your Club

More about caravan towing mirrors

Q. Has The Club had an opportunity to research the issue of towing mirrors further?

A. Yes, The Club has been in discussion with its legal advisers. A summary of their advice is below:

Current situation:

A car towing a caravan, if first used on or after 1 June 1978 and before 26 January 2010 (ie the majority of cars in use now) must have:

- (i) at least one exterior mirror fitted on the offside of the vehicle; and
- (ii) at least one interior mirror, unless a mirror so fitted would give the driver no view to the rear of the vehicle; and
- (iii) at least one exterior mirror fitted on the nearside of the vehicle unless an interior mirror gives the driver an adequate view to the rear.

These mirrors must comply with the requirements in EC Directives 71/127, 79/795, 86/562 or 88/321 or ECE Regulation 46.01. That is, they must comply with the old/existing requirements for mirrors, unless they already comply with EC Directives 2003/97 or 2005/27, which are not yet obligatory for cars.

Since the Motor Vehicles (Designation of Approval Marks)

Regulations 1979, mirrors have had to have EC type approval to be

legally used. This approval is made apparent by the e-mark specified in the contemporary legislation being marked on the equipment. The e-marks used have changed as the legislation has been updated to reflect technological advances. Mirrors without the relevant e-mark may well be EC compliant and therefore legal. However, the consumer has no apparent proof of legality without confirmation from the manufacturer.

The mirrors must be fixed in the following manner:

- (a) in such a way that they remain steady under normal driving conditions;
- (b) exterior mirrors visible to the driver through a side window or portion of the windscreen swept by the wipers;
- (c) where the bottom edge of the mirror is less than 2m above the road, the mirror shall not project more than 20cm beyond the overall width of the vehicle (or trailer being pulled);
- (d) where the bottom edge of the mirror complying with Directives 2003/97 or 2005/27 or ECE Regulation 46.02 (ie a new specification mirror but on a car first used before 26 January 2010) is less than 2m above the road, the mirror shall not project more than 25cm;
- (e) interior mirrors shall be capable of being adjusted by the driver;

(f) each exterior mirror on the driver's side shall be capable of being adjusted by the driver from the driving seat.

Therefore, cars towing caravans that are currently being used do **not** need to have new mirrors fitted, nor do new mirrors need to be purchased.

This applies to all cars used before 25 January 2010. If one has an historic vehicle pre-dating 1 June 1978, contemporary towing mirrors may be used. This situation will **not** change after 26 January 2010.

Future situation

A car towing a caravan, first used on or after 26 January 2010 comes under item 9 of the table in The Road Vehicles (Construction and Use) (Amendment) (No 4) Regulations 2005 and as such must have mirrors complying with Directives 2003/97 and 2005/27. That is, the mirrors must show the new e-mark as set out in this new legislation. Members wishing to confirm the compliance of a specific mirror with this legislation are advised to seek advice from the mirror manufacturer, distributor or retailer.

Conclusions

Currently, there is no need for consumers to purchase new mirrors, although they are free to do so. From 26 January 2010 there will also be no need for consumers to purchase new mirrors unless and until they purchase a new vehicle. Anyone currently looking to buy new mirrors might consider it prudent to select those which are compliant with the

post-January 2010 requirements, since such mirrors will satisfy the most recent safety requirements, and will remain usable with any car bought in the foreseeable future.

NOTE: The e-mark may contain numbers such as E11, which is the designated number for United Kingdom; or other numbers, such as E1, E2. This number merely denotes the country of testing.