



BRIEFING EU Strategic Action Plan on Road Safety

June 2018

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Context

On 17 May 2018 the European Commission adopted its EU Strategic Action Plan for Road Safety, outlining the main measures to be taken before the end of the current Commission's mandate ending in 2019, as well as an outline of actions planned for the 2021-2030 period.¹ The EC also committed to present an EU Road Safety Policy Framework for 2021-2030 by spring 2019 to further develop the proposals.

The EU Strategic Action Plan was published as part of the third mobility package, which also includes new vehicle safety standards², updated rules on road infrastructure safety management³ and a strategy for automated driving⁴.

This short briefing reflects ETSC's first analysis of the Commission's EU Strategic Action Plan for Road Safety with suggestions for new actions to be included in the more developed framework to be presented by spring 2019.

An earlier briefing published in February as input to the Commission's preparatory process contains ETSC's detailed recommendations for priority actions for the next decade.⁵

In particular, ETSC welcomes the following elements of the action plan:

- ✓ A new target to halve road deaths between 2020 and 2030 as well as, for the first time, a target to reduce serious injuries by the same proportion
- ✓ Key Performance Indicators (KPIs) - to be developed
- ✓ New funds to support road safety
- ✓ Focus on infrastructure and vehicle safety legislation
- ✓ Preparation of possible legislation on enforcement and updating of relevant legislation in preparation for automation.

ETSC calls for the full policy framework to include:

- Specific measures on reducing serious injuries, in light of the new target
- Measures, not just further research, in areas such as distraction and drug driving enforcement technology
- Legislation where appropriate instead of unenforceable voluntary commitments

¹ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

² ETSC (2017) Short Briefing on the Revision of the General Safety Regulation and Pedestrian Protection Regulation. <https://bit.ly/2IKMVZO>

³ ETSC (2018) ETSC Position on the Revision of the Infrastructure Safety Directive. <https://bit.ly/2xlQ5co>

⁴ ETSC Position is under preparation.

⁵ ETSC (2018) Briefing: 5th EU Road Safety Action Programme 2020-2030. <https://bit.ly/2LuTDBW>

- Recognition of the need to revise legislation in the medium term (i.e. in 2025), for example the General Safety Regulation and the Infrastructure Safety Directive.

Progress 2010-2018

In 2010, the European Union renewed its commitment to improve road safety by setting a target of reducing road deaths by 50% by 2020, compared to 2010 levels.

25,250 people lost their lives on the EU roads in 2017, representing a 2% reduction on the 2016 figure. This number has fallen by only 3% in the last four years. There has been progress over a longer period but it is not enough to meet the 2020 target.

Since 2010, EU countries achieved an overall reduction in road deaths of 20%, far less than the 38% needed to stay on course to meet the target. Time is running out; the target is now highly unlikely to be met. Strong political will and urgent measures are still needed in all EU Member States to narrow the gap between the desired and the actual EU progress.

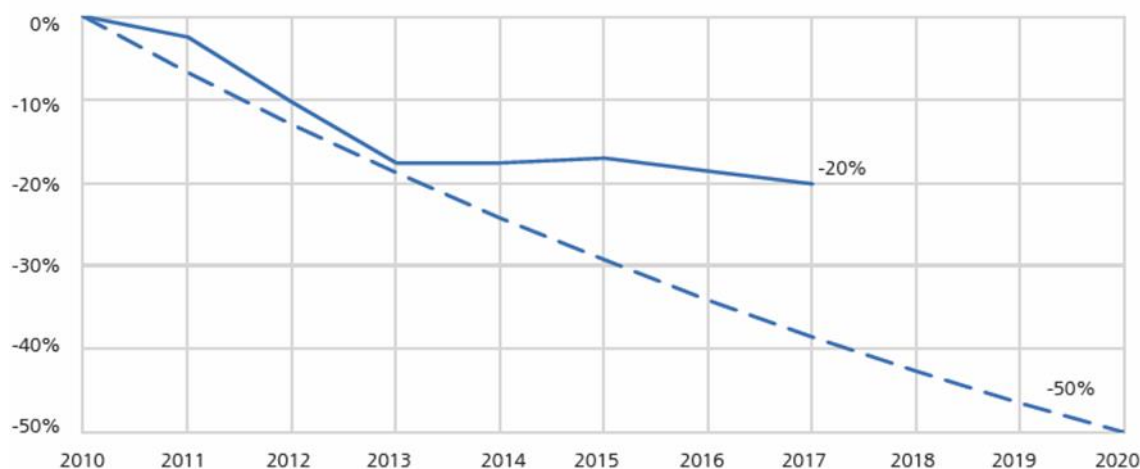


Fig.1: Reduction in the number of road deaths since 2010 for the EU28 taken together (blue line) plotted against the EU target for 2020 (blue dotted line).

In addition, around 135,000 people were seriously injured on European roads in 2014 according to European Commission estimates based on the MAIS3+ standard definition of a serious injury.

The long-awaited impetus of the EC in its Third Mobility Package could contribute significantly to resuming road safety improvement soon and driving progress over the next decade.

EC Priorities for the Future and ETSC's Analysis

ETSC welcomes the priorities chosen up to the end of the current mandate and for the next decade included in its adopted EU Strategic Action Plan. These are listed below, with ETSC's analysis and recommendations.

Enhanced Road Safety Governance

New framework in 2019, future vision and targets

Under the section on "Enhanced Road Safety Governance" the EC presents a framework including targets and Key Performance Indicators as well as looking at how to change the structures to deliver and improve road safety policy at EU level. ETSC welcomes the EU Strategic Action Plan for Road Safety and looks forward to a fully-fledged version due to be published in spring of 2019.

ETSC welcomes that the announced EU Road Safety Policy Framework for 2021-2030:

- ✓ Will be guided by the long-term Vision Zero⁶ and embody the "Safe System Approach".⁷
- ✓ Will enshrine the targets adopted in the Valletta Declaration⁸ to reduce both deaths and serious injuries by 50% between 2020 and 2030.

ETSC recommends:

⁶ A vision can be regarded as a leverage point to generate and motivate change and needs to be far-reaching and long-term, looking well beyond what is immediately achievable. ETSC (2006) A Methodological Approach to national Road Safety Policies. Vision Zero adopted in the European Commission Transport White Paper 2010, <https://goo.gl/BwTY9R>

⁷ European Commission (2013) Commission Staff Working Document: On the Implementation of Objective 6 of the European Commission's Policy Orientations on Road Safety 2011-2020 – First Milestone Towards an Injury Strategy. <https://goo.gl/gCw1zk>

⁸ Valletta Declaration on Improving Road Safety (2017). <https://goo.gl/JsX7gS>

- Adopt specific targets to reduce deaths of children and vulnerable road users.⁹

Key Performance Indicators

ETSC welcomes:

- ✓ The proposal to come up with a list of Key Performance Indicators (KPIs). Ahead of the European Commission proposal, ETSC presented a possible list of KPIs and explains how KPIs can give a more complete picture of the level of road safety and can detect the emergence of problems at an earlier stage.¹⁰

ETSC recommends:

- Introduce a two-step process, whereby in a first phase, EU Member States would be asked to collect the data based on KPIs and, in a second phase, targets would be set to match the performance of the three best performing countries for each indicator.

In-depth accident investigation

At present there is a general lack of representative pan-European in-depth collision data to aid the development of safety policy, vehicle regulation and technological advancement.

ETSC asks the European Commission to:

- Support EU Member States in collecting harmonised in-depth accident investigation data relating to fatal and serious injury collisions.¹¹
- Build on the DaCoTa deliverable related to in-depth accident investigation in creating a pan-European in-depth accident investigation database.

New structures and roles of ambassador and cross DG coordination group

Road safety policy needs to be supported by effective institutional management in order to achieve long term effects on road safety levels. In our earlier briefing, ETSC stresses that clear institutional roles and responsibilities should be set up with strong political

⁹ ETSC (2018) Briefing: 5th EU Road Safety Action Programme 2020-2030. <https://bit.ly/2LuTDBW>

¹⁰ ETSC (2018) Briefing: 5th EU Road Safety Action Programme 2020-2030.

<https://bit.ly/2LuTDBW>

¹¹ ibid

leadership from the Commissioner for Transport.¹² As well as putting forward legislation, in the following decade the European Commission must continue to fulfil its crucial role in supporting EU Member States and motivating them to act to do their utmost within their power. Some of these aforementioned elements are included in the adopted EU Strategic Action Plan.¹³

ETSC welcomes:

- ✓ Enhancing the mandate of the High Level Group on Road Safety and a new cross-DG coordination group including the organisation of biannual results conferences.¹⁴
- ✓ Appointing a European Road Safety Ambassador. The ambassador and the cross-DG co-ordination group could report both to the relevant commissioners and to a more open and transparent version of the European Commission's High Level Group on Road Safety.

ETSC recommends:

- Strengthening DG MOVE's lead road safety unit capacity particularly in any further development of its road safety strategy and targets, coordination, monitoring and evaluation functions.
- Creating a European Road Safety Agency responsible for the collection and analysis of accident data, help speed up developments in road safety and provide a catalyst for road safety information and data collection.¹⁵ The Agency could also come up with new technical standards for European vehicles as well as overseeing and coordinating EU input to the UNECE process.

Stronger Financial Support for Road Safety

Cost to society

¹² ETSC (2018) Briefing: 5th EU Road Safety Action Programme 2020-2030. <https://bit.ly/2LuTDBW>

¹³ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

¹⁴ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

¹⁵ ETSC (2018) Briefing: 5th EU Road Safety Action Programme 2020-2030. <https://bit.ly/2LuTDBW>

Both deaths and serious injuries carry a huge cost to society. A recent study estimated the value to society of preventing all reported collisions in the EU to be about 270 billion Euros in 2015.¹⁶ The EC's EU Strategic Action Plan proposes a new package of funding measures which will be further backed up by the 2021-2027 budget.¹⁷ As a first step, the EC has made available 200 Million Euros of the 2018 Connecting Europe Facility (CEF) to be used for road safety including infrastructure upgrades.¹⁸

The new budget

ETSC welcomes:

- ✓ The EC proposal to streamline and strengthen funding support for road safety action in the next Multiannual Financial Framework (MFF / EU budget).
- ✓ The new proposal of the 'common provisions' regulation for European Social Fund (ESF), European Regional Development Fund (ERDF) and the cohesion funds including a new possibility for financial support to: "assess road safety risk in line with existing national road safety strategies, together with a mapping of the affected roads and sections and providing with a prioritisation of the corresponding investments".¹⁹
- ✓ Safe and secure mobility is included in the new CEF regulation objectives under Article 3 and "actions implementing safe and secure infrastructure and mobility including road safety" are included under the eligible actions under Article 9.²⁰
- ✓ Within the MFF, the EC wants to support other initiatives such as, for example, joint cross-border road traffic enforcement operations organised in cooperation

¹⁶ About 40% of 270 billion EURO represents a saving of GDP wasted in collisions and their consequences, and the other 60% represents a monetary valuation of the saving in human costs to close associates of those who are killed, and to the injured and their close associates.

Reported costs show wide variations, mainly due to: 1) methodological differences, especially concerning the method applied for the calculation of human costs, 2) differences regarding the cost components that are taken into account, 3) differences in the definitions of a serious and a slight injury, and 4) differences in levels of underreporting. These issues are taken into account in the corrected estimates. In Wijnen, W., et al. (2017), Crash cost estimates for European countries, Deliverable 3.2 of the H2020 project SafetyCube. <https://goo.gl/Ff6jYo>

¹⁷ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

¹⁸ ibid

¹⁹ European Commission (2018), ANNEXES to the Proposal for a REGULATION laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund[...]. <https://goo.gl/bi22JA>

²⁰ European Commission (2018), Proposal for a REGULATION [...] establishing the Connecting Europe Facility and repealing Regulations (EU) No 1316/2013 and (EU) No 283/2014 <https://goo.gl/X57oXW>

between police bodies.²¹

- ✓ The EC will also look at possibilities to financially support capacity building at Member State level. They cite the possible example of supporting the development of Safe System strategies including KPI measurement methodology.²²

This is all welcome and fits with priorities set out in the proposed EU Strategic Action Plan such as: enforcement, infrastructure and capacity building amongst EU Member States on road safety management.²³ This is also in line with the ETSC recommendation that EU funds should support the implementation of those measures included in the EU Road Safety Programme 2020-2030 which have the highest lifesaving potential.

ETSC recommendations:

- Identify, within the new MFF budget, investment in new road safety measures such as, for example, regional funds for roads being conditional to improving infrastructure safety.
- Create an EU fund to support priority measures such as for cities to introduce 30 km/h zones (particularly in residential areas and where there are a high number of VRUs) and to invest in high risk roads which carry a high percentage of traffic.

Safe Roads and Roadsides

ETSC welcomes that the EC sets proposals for 'safe roads and roadsides' within the Safe System approach which means that 'road engineering involves matching road function, design, layout and speed limits to accommodate human error in a way that road collisions do not lead to death and serious injury'.²⁴

Revision of the Road Infrastructure Safety Management Directive 2008/96

ETSC welcomed the EC proposal for a revision of this directive, published as part of the 3rd Mobility Package on 17 May 2018. The proposal mandates more transparency, network-wide risk assessment, extending the scope beyond the TEN-T to all primary roads and strengthening the requirements to protect VRUs. The proposal also includes general

²¹ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

²² European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

²³ ibid

²⁴ ibid

performance standards for road markings and road signs.

ETSC welcomes:

- ✓ Setting up of an expert group to develop a framework for road classification that better matches speed limit to road design and layout in line with the Safe System approach.²⁵
- ✓ Setting up a forum of European road safety auditors to facilitate exchange of experience on Safe System methodologies.

ETSC recommends:

- Alongside preparation of technical guidance which could support EU Member States, the EC should also look at including a revision of the Infrastructure Safety Directive within the next ten-year strategy period e.g. in 2025.

Safe City Award

ETSC welcomes:

- ✓ The proposal to set up a Safe City Challenge or award. A Safe City Label should be linked to developments in urban mobility and infrastructure measures and protection of VRUs and involve adequate funding and monitoring.²⁶

ETSC recommends:

- The creation of a new EU fund to support Safe City demonstration projects with a safe speed element including, for example, the introduction of 30 km/h limits.²⁷

ETSC supports the suggested actions under Point 3 on improving road infrastructure management but would also add the need to review the implementation effects of the revised directive and consider further improvements in the second half of the 2020-2030 strategy period.

²⁵ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

²⁶ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

²⁷ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

ETSC recommendations for the revision of the Road Infrastructure Safety Management Directive (RISM) 2008/96

- Extend the application of the instruments of the RISM Directive 2008/96 to cover all motorways, all EU (co-)financed roads, primary roads, main rural and main urban roads.
- Introduce a Network Wide Risk assessment of the road network and review findings regularly for action.
- Support common EU curricula for auditors and inspectors, including specific training on the needs of VRUs: pedestrians, cyclists, PTWs the elderly and road users with reduced mobility.
- Set up common EU minimum performance requirements for providing and maintaining road markings, safety barriers, obstacle-free roadsides and adapted intersections.
- Set minimum road infrastructure safety requirements concerning the harmonised management of high-risk sites.
- Review the implementation of the Directive and look to update it within five years of adoption and within the next Strategy period.

Set up guidelines for:

- The harmonised management of high-risk sites by means of low cost measures.
- The provision and maintenance of “forgiving roadsides” building on the experience of other EU countries and promote them amongst auditors and transport planners.
- Implementing the concept of ‘self-explaining’ and ‘self-enforcing’ roads, matching speed limits to the road characteristics.
- Promoting best practice in traffic calming measures, based upon physical measures such as roundabouts, road narrowing, chicanes, road humps and techniques of space-sharing, to support area-wide urban safety management, in particular when 30 km/h (or 20 mph) zones are introduced and where there are high levels of VRUs.

Safe Vehicles

Revision of the General Safety Regulation and Pedestrian Safety Regulation

Under section 4 on “Safe vehicles” the EC describe the measures included in the revision

of the General Safety Regulation and the Pedestrian Safety Regulation.²⁸ The revisions of these regulations represent the most direct and effective measures the EU has to further reduce road deaths and injuries. In the Strategic Action Plan the EC highlights the intention to make a number of safety features mandatory (including several recommended by ETSC over several years).²⁹ These include overrideable Intelligent Speed Assistance and Autonomous Emergency Braking. The EU's collision testing regime will also be updated with the inclusion of new tests and adaptation of existing ones. This revision, will start to make an impact during the 2020-2030 period.

ETSC welcomes:

- ✓ Plans to evaluate future developments, as the provisions within the GSR will need to be reviewed well before the end of the 2020-2030 strategy period in order to keep pace with technical advances.
- ✓ Other priorities for evaluation include roadworthiness testing, under which ETSC would welcome especially the extension of regular mandatory technical checks to motorcycles and vans.³⁰

²⁸European Commission (2018) Regulation on type-approval requirements for motor vehicles and their trailers, and systems, components and separate technical units intended for such vehicles, as regards their general safety and the protection of vehicle occupants and vulnerable road users, amending Regulation (EU) 2018/... and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009. <https://bit.ly/2JbVNZL>

²⁹ ETSC (2017) Short Briefing on the Revision of the General Safety Regulation and Pedestrian Protection Regulation. <https://bit.ly/2IKMVZO>

³⁰ ETSC Position (2015) Roadworthiness Package. <https://bit.ly/2Lq2dlf>

ETSC recommendations for the revision of the General Safety Regulation (GSR) and Pedestrian Safety Regulation (PSR)³¹:

- Upgrade type approval crash tests to be more closely aligned with the requirements of Euro NCAP crash tests.
- Update the existing pedestrian protection tests for new motor vehicles and extend them to protect cyclists and riders/passengers on PTWs.
- Extend the mandatory fitment of advanced seat belt reminders as standard equipment to all seats.
- Fit all new commercial vehicles with assisting Intelligent Speed Assistance (the system should be overridable up to 90km/h for lorries, 100km/h for buses, in line with existing EU legislation on speed limiters, and 130km/h for vans) and all new passenger cars with an overridable Intelligent Speed Assistance system that defaults to being switched on.
- Fit Autonomous Emergency Braking systems (which operate at all speeds and can detect pedestrians, cyclists, mopeds and motorcycles) to all new vehicles, including trucks.
- Ensure that retrofitting of vehicles with alcohol interlocks continues to be possible in the future. Legislate for a consistently high level of reliability of alcohol interlock devices. As a first step towards wider use of alcohol interlocks, legislate their use by professional drivers.
- Mandate Event Data Recorders in all new vehicles and require the data to be made available for accident investigation.
- Encourage EU Member States to provide tax incentives for the purchase and use of safe cars (5 star Euro NCAP cars).
- Revise legislation on car CO₂ labelling and marketing to require inclusion of Euro NCAP test results when they are available (“Stars on cars!”).
- Develop mandatory requirements for safer goods vehicles stipulating improved cabin design and underrun protection, and remove exemptions that exist so as to require the use of side guards to protect other road users in collisions with trucks.
- Encourage the design of new vehicles, or adapting vehicles for persons with reduced mobility.
- Encourage elderly-friendly design of new vehicles as well as evaluating the impact of new technologies on older drivers.

European vehicle safety standards and the role of the UNECE

³¹ Short Briefing on the Revision of the General Safety Regulation and Pedestrian Protection Regulation. <https://bit.ly/2IKMVZO>

Over the last two decades, there has been considerable political pressure to regulate technical standards for vehicles at the global level. Many new technical standards that apply in the European Union are now developed, with EC and EU Member State participation, at the global forum of the United Nations Economic Commission for Europe (UNECE), based in Geneva. Once rules have been agreed, they are signed off by Member States and then cut and pasted into EU law as a *fait accompli* - with the only possibility for co-legislators to take it or leave it.

The benefits are reduced barriers to trade, and lower costs for the car industry. The main weaknesses include limited oversight by both co-legislators of the process, as well as very limited public scrutiny and participation. NGOs, including ETSC, struggle to find the necessary resources needed to follow the multitude of highly technical meetings that take place both in Geneva and around the world. Media scrutiny of the process is virtually non-existent.

ETSC believes that, ideally, vehicle safety technical regulations for the European Union should be developed at the EU-level, as an EU-first approach would be better tuned to the road safety needs of the EU and potentially deliver regulations faster with more rapid updates to reflect the evolution of technology.

A bespoke EU road safety agency, staffed with technical, legal and road safety experts, would be the ideal solution as is the case in the United States (NHTSA – The National Highway Traffic Safety Administration).

But if the EU continues with the current approach to establish the technical rules at UNECE level, then ETSC proposes the following safeguards:

- Enable the European Parliament to participate in the UNECE regulatory process and ensure that all its Members are sufficiently informed to properly scrutinise both the progress of development as well as the content of the technical rules
- As a minimum therefore, the European Commission should present annual reports to the European Parliament (and Council) on progress on technical regulations at the UNECE.
- In addition, the European Commission should present the progress on technical regulations at UNECE during the meetings of the relevant European Parliament's Committee preceding the World Forum's meetings in March, June, November.
- All relevant EU legislation should include a mechanism with a built-in deadline to ensure that if progress is not made fast enough at UNECE level, the EC is obliged to revert to developing an EU standard.

Other priorities for evaluation include roadworthiness testing, under which ETSC would welcome especially the extension of regular technical checks to motorcycles and vans.³²

Procurement

Under this vehicle safety section the EC also plans to look at how safety considerations can be made more prominent in EU public procurement legislation. Here the EC should be revising its existing legislation on public procurement 2014/24/EU by including “safe workers” under the social clause. ETSC would advocate a more precise interpretation of the clause so as to include reducing road risk.³³ That would encourage or even oblige procurers to develop and apply criteria on Work Related Road Safety. For example, obliging public authorities to adopt safety criteria when procuring vehicles such as the Euro NCAP five star safety rating.

This could also come about from an action under the funding section (section 2) of the EC Strategic Action Plan with the proposal of the EC to explore, in close cooperation with the EIB, how public authorities could access appropriate financial support for procuring safer fleets and suggest, for example, extending the existing Cleaner Transport Facility.³⁴

Under section 4, the EC is also seeking voluntary commitments from manufacturers rolling out safety features beyond the minimum requirements for all price segments. It took several decades for automotive innovations such as anti-lock braking, airbags and even seat-belts from being introduced in cars in the premium segment until they trickled down to all models.³⁵ This is why regulation is needed to ensure that safety benefits are spread faster among the entire fleet of new vehicles and that safety improvements are not limited to better informed or wealthier consumers.³⁶

ETSC favours the introduction of mandatory fitment with key safety equipment as standard under legislation under the review of the General Safety Regulation.³⁷ However we recognise that earlier introduction of life saving equipment by manufacturers can also make an important contribution to saving lives.

ETSC recommends:

- Revision of existing legislation on public procurement 2014/24/EU by including “safe workers” under the social clause.

³² ETSC Position (2015) Roadworthiness Package. <https://bit.ly/2Lq2dlf>

³³ ETSC (2015) Reducing Road Risk at Work Through Procurement. <https://bit.ly/2IFMalH>

³⁴ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHG5w>

³⁵ ETSC Position (2017) Review of the General Safety Regulation 2009/661 <https://bit.ly/2kpgYCO>

³⁶ ETSC PIN Flash (2016) How Safe are New Cars Sold in the EU? <https://bit.ly/2IKfq6M>

³⁷ ETSC Position (2017) Review of the General Safety Regulation 2009/661 <https://bit.ly/2kpgYCO>

In defence of EU road safety legislation

A significant part of the proposed actions under each of the headings in the Commission's road safety action plan (including Safe Vehicles - Section 4) come in the shape of 'voluntary commitments' from stakeholders. Although such commitments can be welcome, especially in new areas as a precursor to legislation, it is less favourable as the action may not end up being completed without the legislative obligation.

Moreover, there are areas under the 'voluntary commitment' section which belong under current EU legislation. One example is work-related road safety. Duty of care and health and safety compliance covering safe road use are legal necessities in all EU Member States, and are an essential consideration for employers.³⁸ The EC encourages EU Member States to consider incentives to fast-track proven technologies by a range of means including also "safe travel policies". However, these travel policies for employers should be the result of risk assessments undertaken to comply with legal obligations of the EU Directive 89/391/EEC on health and safety of workers. This requires every employer in Europe to undertake a risk assessment according to the principle of prevention.³⁹

Other voluntary commitments the EC is seeking are from employers and associations of road hauliers to use vehicles with the latest safety features ahead of these being required by law. Such a 'voluntary commitment' also makes sense in meeting legal obligations as mentioned previously of the EU Directive 89/391/EEC on health and safety.⁴⁰ Vehicle safety technologies can help with ensuring compliance with the traffic code. Moreover it makes a sound business case to invest in preventing collisions involving their vehicles.⁴¹

ETSC recommends:

- The EU itself should be leading by example by implementing work-related road safety management programmes for the EU institutions and their own vehicle fleets. National authorities should be doing the same.
- Fulfil the EU's clear competency to develop new road safety legislation, as defined in the EU treaties.

Financial Incentives: insurance and taxation

³⁸ ETSC (2012) Work Related Road Safety Programmes. <https://bit.ly/2xbBKol>

³⁹ ibid

⁴⁰ ETSC (2012) Work Related Road Safety Programmes. <https://bit.ly/2xbBKol>

⁴¹ ETSC PRAISE Report (2015) The Business Case for Managing Road Risk at Work. <https://bit.ly/2koNsCP>

ETSC welcomes:

- ✓ The EC is calling on the insurance industry to consider changing the structure of their premiums in favour of safer vehicles. There are some good examples of best practice from the work related road safety field where insurers work proactively with their clients to adopt programmes to prevent collisions and this may include fleet fitment with in-vehicle safety technologies.⁴²
- ✓ The EC encouraging Member States to consider national incentives to fast track proven technologies by tax incentives. So far a recent ETSC report has found that green vehicle tax shifts in some countries, including Denmark and The Netherlands, have failed to promote safer as well as cleaner cars, leading to higher sales of cars with lower safety ratings. Taxation should reflect climate change challenges and road safety – not promote one issue at the expense of the other.⁴³

Driver training

ETSC welcomes:

- ✓ The EC proposal that driving schools train new and existing drivers and riders in how to use new vehicle safety features. This could work well in an interim.

ETSC calls for:

- The revision of EU Directive 2006/126 on driving licences to make sure all new drivers are trained in using the new technologies as well as semi and fully automated driving.⁴⁴

Safe Road Use

Under Objective 5 “Safe road use” the EC focuses actions on behaviour of road users covering speed, use of protective equipment such as seatbelts and crash helmets, driving without alcohol and drugs and distraction.

Enforcement

Here enforcement is identified as a key countermeasure with a commitment to review options in improving the Directive 2015/413 on cross-border enforcement (CBE) of traffic offences and a possible legislative initiative on the mutual recognition of driving

⁴² ETSC (2012) Work Related Road Safety Programmes. <https://bit.ly/2xbBKol>

⁴³ ETSC PIN Flash (2016) How Safe are New Cars Sold in the EU? <https://bit.ly/2IKfq6M>

⁴⁴ ETSC (2016) Maximising the Potential of Automated Driving in Europe. <https://bit.ly/2scnxBN>

disqualifications. A recent ETSC report has identified a number of barriers which need to be addressed in the upcoming revision of the CBE Directive, such as updating the camera specifications, a lack of human resources in case of manual follow up and that following up on these offences is not seen as a political priority.⁴⁵ Mutual assistance procedures need to be adapted so that they can also be used more efficiently for the follow up of the non-payment of traffic fines.

ETSC welcomes:

- ✓ The commitment to review options in improving the Directive 2015/413 on cross-border enforcement of traffic offences and a possible legislative initiative on the mutual recognition of driving disqualifications.
- ✓ The proposal to tackle mutual recognition of non-financial penalties. Our briefing elaborates further actions on enforcement such as improving and aligning the enforcement of the main offences at a national level.⁴⁶ A common approach is needed to allow for equal treatment of connected and automated vehicles across Europe.

ETSC recommends:

- Encourage EU Member States to run consistent enforcement activities that are well explained and publicised thereby having a long-lasting effect on driver behaviour.⁴⁷
- Continue to encourage EU Member States to prepare enforcement plans with annual targets for enforcement and compliance in the priority areas such as urban speed enforcement as a tool to reduce involvement of vulnerable road users in collisions.⁴⁸
- Evaluate the barriers preventing full implementation of the CBE directive 2015/413 and adopt countermeasures to overcome them within the revision of the directive.
- Adapt existing EU mutual assistance procedures to deal with cross border road traffic offences.
- Recast the Framework Decision 2005/214 to include civil/administrative offences

⁴⁵ ETSC (2015), Enforcement in the EU – Vision 2020. <http://goo.gl/5NFGNW>

⁴⁶ ETSC (2018) Briefing 5th EU Road Safety Action Programme. <https://bit.ly/2LuTDBW>

⁴⁷ ETSC (2015), Enforcement in the EU – Vision 2020. <http://goo.gl/5NFGNW>

⁴⁸ ETSC (2018) Briefing 5th EU Road Safety Action Programme. <https://bit.ly/2LuTDBW>

as this would provide an important final part in the enforcement chain.

- Investigate avenues for EU revision of existing legislation to cover the mutual recognition of non-financial penalties such as driving disqualifications and demerit point systems.
- Set up and implement a demerit point system which includes a set of fixed penalties for at least the eight major road safety related offences included in the CBE directive 2015/413.
- Intensify enforcement, especially of speeding, in urban areas where there are high numbers of pedestrians and cyclists.

Vehicle safety and behaviour

ETSC welcomes:

- ✓ The transposition of the UNECE regulation making seatbelt reminders mandatory for all seats.⁴⁹
- ✓ The EC commitment to 'work with Member States to enable necessary conditions for the functioning of overridable Intelligent Speed Assistance, including regarding the availability of speed limits in a digital format, and consider the feasibility and acceptability of non-overridable Intelligent Speed Assistance in the future'.⁵⁰

Drink driving

ETSC welcomes:

- ✓ Guidance to Member States on the use of alcohol interlocks is foreseen. ETSC has recently developed guidance for the development of alcohol interlock-based rehabilitation programmes.⁵¹
- ✓ Under the part on voluntary commitments the EC calls upon public authorities to require the fitment of alcohol interlocks in public procurement. Although welcomed by ETSC as a way of increasing the fitment of this life saving tools, as mentioned earlier this could come about as part of binding legislation as opposed

⁴⁹ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

⁵⁰ ibid

⁵¹ ETSC (2016) Alcohol Interlocks and Drink Driving Rehabilitation Programmes in the EU. <https://bit.ly/2KTAF6H>

to a 'voluntary commitment'.

Strengthening the existing EU recommendation on permitted BAC 2001/115 is also on the 'to do' list of the Commission. It wants to extend it to professional drivers and novice drivers. Yet this is already included in the recommendation dating from 2001, at present 9 EU MSs have still not introduced lower BAC limits for these groups.

ETSC recommends:

- Propose a directive on drink driving, setting a zero-tolerance level for all drivers.
- Mandate alcohol interlocks for repeat offenders and professional drivers.

Drug driving

The range of psychoactive substances available for illicit use is widening in the EU and this is further proven by the increased prevalence of illicit drugs in drivers killed in traffic collisions. The DRUID study estimated that illicit and medicinal psychoactive drugs were found in 15.2% and 15.6% respectively of road deaths.⁵²

ETSC welcomes:

- ✓ The EC plans to encourage and support research under the future research and innovation programme on developing testing methods and cheaper tools for drug detection.

ETSC recommends:

- EU policy implementation following years of research.
- Introduce an EU zero tolerance system for illicit psychoactive drugs using the lowest limit of quantification that takes account of passive or accidental exposure.
- Adopt common standards for roadside drug driving enforcement and ensure that police forces are properly trained in when and how to perform drug screening, field impairment tests and use of roadside screening devices.
- Move to adopting a common standard for roadside drug driving enforcement, this could be in the form of a new EC recommendation.⁵³

Fatigue

⁵² European Commission (2011), DRUID Deliverable 2.2.5, Prevalence of alcohol and other psychoactive substances in injured and killed drivers, pp. 164-166, <https://goo.gl/j52ryq>

⁵³ETSC (2017) Preventing Drug Driving in Europe. <https://bit.ly/2KSmtLb>

Research shows that driver fatigue is a significant factor in approximately 20% of commercial road transport collisions and also present in the non-professional driving population.⁵⁴ Apart from a brief mention under a possible drowsiness detection technology, the EU Strategic Action Plan on Road Safety has not included any other action on preventing driving whilst fatigued.

ETSC recommends:

- Action on a number of possible areas from improving compliance with tachograph legislation to safe and secure infrastructure for resting.⁵⁵

Distraction

ETSC welcomes:

- ✓ The proposal to develop a code of good practice with industry to ensure that in-car information systems and phones are designed to allow safe use.⁵⁶ This could act as a useful precursor feeding into the currently proposed GSR legislation.⁵⁷ The new legislation proposes the fitment of 'advanced distraction recognition' means a system capable of recognition of the level of visual attention of the driver to the traffic situation and warning the driver if needed.⁵⁸

Safety of children, young people and novice drivers

In 2016 alone, 600 children died on Europe's roads. Mortality due to road collisions is a major cause of death in this age group.⁵⁹

ETSC welcomes:

- ✓ Under improving child safety the EC identifies action within the education sector making road safety part of the regular curricula. There is little else on improving child safety.
- ✓ Identifying the need for future action on graduated licencing for novice drivers.

⁵⁴ ETSC (2001) The Role of Driver Fatigue in Commercial Road Transport Crashes.

<https://goo.gl/ETZaGV>

⁵⁵ ETSC (2018) Briefing 5th EU Road Safety Action Programme. <https://bit.ly/2LuTDBW>

⁵⁶ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

⁵⁷ European Commission (2018) Regulation on type-approval requirements for motor vehicles as regards their general safety amending Regulation (EU) 2018/... and repealing Regulations (EC) No 78/2009, (EC) No 79/2009 and (EC) No 661/2009 <https://bit.ly/2JbVNZL>

⁵⁸ *ibid*

⁵⁹ ETSC (2018) Child Safety PIN Flash. <https://bit.ly/2Jr6qad>

- ✓ Under the other voluntary commitment actions suggested by the EC they would also seek taxi and ride sharing companies to provide their fleets with child seats. ETSC has previously made this recommendation in a report on taxi safety.⁶⁰

ETSC recommends:

- Under Directive 2005/39, make rear-facing child seats mandatory for as long as possible, preferably until the child is 4 years old.⁶¹
- Develop EU guidelines for traffic mobility education for 12-18 year olds.
- Develop EU evaluation tools to design, implement and evaluate traffic and mobility education.⁶²

ETSC recommendations for the revision of EU Directive 2006/126 on driving licences:

- Adopt a graduated licensing system that encourages young people to gain more experience while limiting certain high-risk activities such as driving at night and with passengers.⁶³
- Introduce hazard perception training, expand formal training to cover driving and riding style as well as skills and encourage more accompanied driving to help gain experience.
- Develop minimum standards for driver training and traffic safety education with gradual alignment in the form, content and outcomes of driving courses across the EU.
- Ensure testing allows examiners to ascertain a safe driving style by including aspects such as independent driving.
- Lower the BAC limit for all young drivers including novice drivers.
- Make theoretical and practical training as well as a practical test mandatory for obtaining a driving licence for moped driving (AM).

⁶⁰ ETSC (2016) Making Taxis Safer. <https://bit.ly/2xbRbNj>

⁶¹ ETSC (2018) Child Safety PIN Flash. <https://bit.ly/2Jr6qad>

⁶² ETSC (2018) Briefing 5th EU Road Safety Action Programme. <https://bit.ly/2LuTDBW>.

ETSC (2017) Reducing Casualties Involving Young Drivers and Riders in Europe. <https://goo.gl/GghTHM>

⁶³ ibid

Fast and Effective Emergency Response

Since 2010 the number of people seriously injured based on national definitions of serious injury on EU roads was reduced by just 1%, compared to a 20% decrease in the number of deaths in the same group of countries.⁶⁴ In 2014, around 135,000 people were seriously injured in the EU based on the common EU definition MAIS3+ according to estimates by the European Commission. There is strong political support to take action on serious injuries.

The newly fixed target to halve serious injuries by 2030 needs to be followed up with specific measures.⁶⁵

ETSC welcomes:

- ✓ The proposed measures under section 6. *Fast and effective emergency response*, such as the evaluation of eCall and possible eCall extension to other vehicle categories. However, more focus should be given to other concrete actions on serious road traffic injury reduction.⁶⁶

Given that there are high numbers of serious injuries in urban areas, actions could include preparing guidelines to promote best practice in traffic calming measures and supporting area-wide urban safety management, in particular when 30km/h zones are introduced.⁶⁷ Many serious injuries could also be avoided by reducing speed, thus actions such as ISA in vehicles, speed enforcement and infrastructure to reduce speed should all be prioritised.

The European Commission should also actively encourage Member States to develop effective post-collision care to ensure that all countries offer equally high standards of rescue, hospital care and long-term rehabilitation following a road collision.

⁶⁴ It is not yet possible to compare the number of seriously injured between Member States because of the different national definitions of serious injury, together with differing levels of underreporting. It is also too early to use data based on MAIS 3+ for comparing countries performance over time. The comparison therefore takes as a starting point the changes in the numbers of seriously injured (national definition) since 2010.

⁶⁵ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

⁶⁶ ETSC (2016) Proposal for a Strategy to Reduce the Number of People Seriously Injured on EU Roads. <https://bit.ly/2J7phHT>

⁶⁷ ibid

ETSC recommendations:

- Prioritise short-term measures that can be implemented with existing knowledge, e.g. measures to improve speed limit compliance will reduce injury severity and have an immediate effect.
- Mandate Event Data Recorders (EDRs) for all new vehicles that could increase accuracy of data as well as the level of understanding of injury causes and injury mechanisms, and in turn can help in evaluation of new road safety technology.
- Using data from EDRs for further analysis can contribute to improved research on post-collision outcomes as well.
- Support EU Member States in collecting numbers of seriously injured according to the MAIS 3+ definition and include numbers of seriously injured in the EU impact assessment of countermeasures.
- Encourage Member States to develop effective emergency notification and collaboration between dispatch centres, fast transport of qualified medical and fire/rescue staff, liaison between services on scene, treatment and stabilisation of the casualty, and prompt rescue and removal to an appropriate health care facility.
- Further develop tools to improve real-time interaction between emergency personnel on the spot and specialists in the trauma centre.
- Extend the scope of Directive 2003/59 to professional driver training of drivers of emergency services.
- Promote the widely accepted standard of a 'casualty centred' methodology, which ensures a unified approach that promotes optimum casualty care coupled with specific steps to achieve a rapid but safe rescue.
- Encourage vehicle manufacturers to provide detailed information on the construction of all vehicles that are being produced to rescue services in order to facilitate a possible extrication of entrapped vehicle occupants in case of a collision.
- Estimate the feasibility of introducing a regulation for the provision of standardised rescue sheets.
- Consider the best options to centralise and maintain a database (of rescue sheets) and have information available on the vehicle (for instance, a standardised ID tag with a link to the database).⁶⁸
- Set common standards for the creation of emergency corridors and apply them throughout the EU. Drivers need to be aware of how they should react once they find themselves upstream of a road collision.
- Encourage Member States to enforce the emergency corridors law, with a special focus on deliberate obstruction or abuse, which may put lives at risk.

⁶⁸ Euro NCAP (2016) 2025 Roadmap p. 11. <https://goo.gl/vZAipP>

Future-Proofing Road Safety

Automation

Under this section in the Strategic Action Plan the EC places a focus on preparing for connectivity and automation.⁶⁹

ETSC welcomes:

- ✓ The EC (DG MOVE together with DG GROW and DG Connect) working with stakeholders to develop a 'code of practice' in autumn 2019 for the safe transition to the higher levels of automation, making sure that approval requirements and certification procedures take road safety considerations into account.⁷⁰ Here they include mixed traffic, interaction with other road users and platooning.
- ✓ The possibility of evaluating whether to review a range of legislation in light of developments in cooperative, connected and autonomous mobility into account. This includes driving licences, roadworthiness, training of professional drivers and driving time.
- ✓ Evaluation of how it might strengthen the coordination of traffic rules (UN Geneva and Vienna Conventions), including at the EU level, so that traffic rules can be adapted to cooperative, connected and autonomous mobility in a harmonised way.

ETSC would welcome this initiative especially its focus on approval requirements and certification procedures. There is an urgent need for a new, comprehensive regulatory framework for vehicles with advanced driver assist systems and automated driving systems on-board as well as for autonomous vehicles. The currently used exemption procedure for approving these technologies and vehicles is furthermore undesirable and should therefore only be used as a short term solution, pending a comprehensive revision. ETSC also supports the priorities of mixed traffic and interaction with other road users that are included.

ETSC recommendations:

- Develop a coherent and comprehensive EU regulatory framework for the safe deployment of vehicles with automated driving systems on board as well as for autonomous vehicles.
- Revise the EU type approval regime to ensure that automated vehicles comply

⁶⁹ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

⁷⁰ European Commission (2018) EU Strategic Action Plan on Road Safety. <https://bit.ly/2xHGu5w>

with all specific obligations and safety considerations of the traffic law in different EU Member States.

- Revise type approval standards to cover all the new safety functions of automated vehicles, to the extent that an automated vehicle will pass a comprehensive equivalent to a 'driving test'.
- Ensure that the Driving Licence Directive 2006/126 remains valid for new technologies and autonomous and semi-autonomous driving.
- Investigate possibility of other actors, such as car dealers, being trained by an approved authority to inform customers of new in vehicle safety technologies.

ITS and C-ITS

ETSC welcomes:

- ✓ Under ITS, the EC will adopt specifications under the ITS directive including vehicle-to-vehicle and vehicle-to-infrastructure communication by winter 2018.

ETSC recommendations:

- The C-ITS services that will have the highest safety potential to be prioritised and rapidly deployed. ETSC's priorities include in-vehicle dynamic speed limits, emergency electronic braking lights, road works warning, weather conditions, intersection safety and vulnerable road user protection.
- The EC to swiftly present a measure mandating the deployment of the safety enhancing C-ITS services.
- Establish a detailed timetable for the introduction of safety enhancing C-ITS services, including a clear set of targets for what the EU needs to achieve between 2020 and 2029 in the context of the gradual EU-wide deployment of C-ITS.
- Prioritise the deployment of C-ITS services with the highest safety potential, those with a proven road safety record, low cost solutions and those with a high cost-benefit ratio.
- Research the cost-effectiveness of retrofitting older vehicles with an on-board unit which could provide basic C-ITS services that enhance road safety.

Human Machine Interface

ETSC welcomes:

- ✓ The EC will evaluate the need for action in promoting the harmonisation of human-machine interface fitted to vehicles to ensure all drivers and users can interact with vehicles without compromising safety.

ETSC calls for:

- An obligation for vehicle manufacturers to publish their tests to show compliance with the human-machine interface (HMI) Guidance Statement of Principle on in-vehicle information and infotainment systems. External HMI is also a new area for urgent review in preparation for automation.
- HMI should be a priority for 9th R&D Framework Programme.

Work Related Road Safety

ETSC welcomes:

- ✓ The EC is seeking voluntary commitments from “operators, fleet managers and hauliers to adopt a corporate road safety policy” and “trade associations to give road safety guidance to SMEs”.

ETSC recommendation:

- The EC to do more to ensure application of existing legislation. Duty of care, OSH and road safety compliance are legal necessities in all EU member states and employers must take them into consideration. The EU Directive 89/391/EEC on health and safety of workers requires every employer in Europe to undertake a risk assessment according to the principle of prevention.

EU's Global Role: Exporting Road Safety

Globally, each year, nearly 1.3 million people die as a result of a road traffic collision: 90% of road deaths occur in low- and middle-income countries, which claim less than half the world's registered vehicle fleet.

ETSC welcomes:

- ✓ Further developing road safety cooperation with the EU's neighbours in particular by sharing best practice and supporting capacity building.
- ✓ Exploring how to cooperate with international financing initiatives such as the UN Road Safety Trust Fund.

ETSC recommendations:

- Better integrate road safety into aid programmes.
- Show stronger political leadership at an international level in reaching global targets set at UN level.⁷¹
- As the world's biggest aid donor, ensure that EU road safety policy objectives apply to external programming.

⁷¹ WHO, Developing Global Performance Targets in Road Safety. <http://bit.ly/2f8S9fU>

Annex – Summary of KPIs

Final outcome indicators

- Long term target of Vision Zero for 2050 set in the Transport White Paper
- A renewal of the target to reduce road deaths to 2030
- Endorsement of the target to reduce serious injuries to 2030
- A new target on the safety of children to 2030

Results based targets (intermediate outcome indicators)

The suggested KPIs:

- % of motor vehicles (car, van, HGV, Bus) travelling within the speed limit by road type (urban, rural non-motorway, motorway).
- % reduction in the number of alcohol related road deaths.⁷²
- % of seat belt use in front and rear seats by type of motor vehicle occupant.
- % of occupants killed without wearing a seat belt/restraint system.
- % of children correctly fitted in the appropriate child restraint system.
- % of passenger car drivers using a handheld cell phone (roadside survey).
- % of helmet use by motorcycle, moped and bicycle riders.
- % of rural roads with 4 star EuroRAP.
- % of roads meeting the standards of the infrastructure safety management directive.
- % of roads with speed limits set at appropriate levels (e.g. 30 km/h).⁷³
- % of 1-2-3-4-5 star Euro NCAP cars among new passenger cars.
- Age of the vehicle fleet.
- Number of checks performed by the police and safety cameras (where applicable) in the priority areas of speeding, drink driving, illegal use of mobile devices, seat belt, child restraint and helmet use.
- Exposure data for all road users (pedestrians, cyclists, PTWs, cars, vans, HGVs) on all types of roads (urban, rural non-motorway, motorway).
- % of work-related road collisions within the framework of the road safety field that covers road deaths and serious injuries among professional road users, commuters, third parties and workers on the roads and covers all road user

⁷² Using the SafetyNet recommended definition of drink driving: any death occurring as a result of road accident in which any active participant was found with blood alcohol level above the legal limit.

⁷³ In line with the principles of sustainable safety SWOV (2012) based on Tingvall and Haworth 1999, <http://bit.ly/2DvAyf7>

groups; allowing for a breakdown of professional road users, commuters, road workers and third party deaths and serious injuries.

Indicators to monitor post collision response

- Proportion of patients treated by ambulance staff within 15 minutes.
- Proportion of patients receiving Advanced Trauma Life Support (ATLS Protocol⁷⁴).

(This could be a one-time check, by EU Member States, to see if, and what proportion of, hospitals practice ATLS.)

⁷⁴ https://en.wikipedia.org/wiki/Advanced_trauma_life_support <http://bit.ly/2ncOoMp>

FOR FURTHER INFORMATION

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The European Transport Safety Council (ETSC) is a Brussels-based independent non-profit making organisation dedicated to reducing the numbers of deaths and injuries in transport in Europe.