Tuesday the 28th September 2021

To: Members of the TCMV

Direct Vision standards for heavy vehicles to be discussed in the TCMV meeting on Thursday

Dear Members of the TCMV,

We are writing to you as an alliance of organisations interested in the safety of pedestrians and cyclists in interactions with large vehicles. We have been actively participating in the UNECE VRU Proxi Working Group within the Working Party on General Safety Provisions (GRSG). This work is within the framework of 'direct vision' standards for heavy vehicles as required by the EU's General Safety Regulation.

We understand that you will be discussing the proposed UNECE direct vision standard for trucks and buses in the meeting of Thursday 30th September. We would therefore like to take this opportunity to provide you with comments on the proposal. Though these values and configurations are the result of a great deal of compromise on safety, we are in general agreement with the proposal, and in particular support:

- The categorisation of trucks into three levels for the purposes of applying a tiered (or differentiated) set of performance values depending on vehicle characteristics, with level 1 (trucks that mainly go into urban areas) being the highest;
- The performance m^3 values of 11.2, 8.0, and 7.0 for trucks at levels 1, 2, and 3 respectively;
- The minimum m^3 level of performance values at Level 1 of 3.4, 1.8, and 2.8 for nearside, front, and offside respectively;
- A minimum m^3 performance value of 1.0 to the front, only for Level 2 and 3 trucks.

One issue that still requires careful consideration is potential exemptions for existing truck types that may find it difficult to reach the performance values but are also less likely to enter areas where people cycle or walk. We await details regarding the exemptions sought by industry (to come in a proposed amendment) which we believe should:

- Be very limited to a small cohort of trucks;
- Offer high levels of direct vision, albeit falling short of the performance value otherwise applicable;

- Be equipped with quality-assured technology-based safety systems ideally shown to more than offset the shortfall in direct vision.

The issue of 'compensatory' technology is fraught with risk for well-known reasons (sensory overload for truck drivers; technological failure due to breakages, adverse weather, mud or malfunction; the deliberate disablement of such systems, etc.). The level of exposure of these trucks to cyclists and pedestrians isn't known, nor is the risk of perverse effects, i.e. the potential for the expansion in the purchase and use of exempted vehicles. We urge the TCMV to be vigilant when proposals for exemptions are tabled later in the process, and to consider *very* carefully the implications of allowing these large and fundamentally incompatible trucks to be excluded from good direct vision requirements.

We would draw your attention to the effectiveness issues that still accompany active safety systems. Low speed active safety systems are still very much in the developmental stage: they have not been shown to work for all types of pedestrian use cases and virtually no cycling use cases. Work in the VRU-Proxi MOIS, and AEB-HGV working group have highlighted the difficulties in including pedestrians, and certainly cyclists, within the parameters of active technologies.

Unexpected problems - including the potential for counter-productive outcomes - accompany the idea of allowing active systems to assume the risks that should be borne by the driver and his/her ability to drive (and to see from) the truck. If active safety systems were to be included in some very small number of cases, there should be guarantees from the industry that these systems would work well and would go beyond offsetting the shortfall in direct vision.

However, in general, we support the direction of the current discussions, we believe there is a good commitment to safety from most of the contracting parties and the European Commission.

May we also remind you of letter written by a group of cities that also support the best improvement possible for the truck direct vision. The cities included Berlin, Copenhagen, Lisbon, London, Malmo, Osnabrück, Paris, Region of Stockholm, Valencia, and a network of Swedish Cycling Cities. The letter directly referenced the work done in the UNECE VRU-Proxi and was quite clear that it expects Contracting Parties to ensure new large vehicles are as safe as possible.

In the event you would like to discuss any of the points raised here, please email james.nix@transportenvironment.org.

Yours faithfully,

Antonio Avenoso, Executive Director, European Transport Safety Council (ETSC)
Filippo Randi, President, European Federation of Road Traffic Victims (FEVR)
William Todts, Executive Director, Transport & Environment
Karen Vancluysen, Secretary General, POLIS Network - Cities and Regions for Transport Innovation
Geert van Waeg, President, International Federation of Pedestrians
David Ward, President, Towards Zero Foundation
Jill Warren, CEO, European Cyclists Federation (ECF)