



12 February 2019

Dear Member of the European Parliament committee on Internal Market and Consumer Protection,

On 21 February, you and your colleagues on the IMCO committee of the European Parliament will vote on the package of vehicle safety and pedestrian protection measures known as the General Safety Regulation.

It is not an overstatement to say that these measures represent a historic, once-in-a-generation opportunity to dramatically reduce the scourge of death and serious injury on Europe's roads. Not since the introduction of mandatory seatbelt laws, has such a change been possible.

The European Commission's official impact assessment conservatively estimates these measures will prevent 25,000 deaths and 140,000 serious injuries over the period 2021-2037.

In particular the measures will help address the safety of vulnerable road users in urban areas, a group which has not benefited from past vehicle safety measures as much as vehicle occupants.

However, the ultimate success of this package depends on the Commission's well-designed combination of complementary measures that work together to help prevent collisions from taking place, reduce the energy forces in a collision and protect vehicle occupants and vulnerable road users in the event of a crash.

There have been calls from a minority of stakeholders in the political discussion on these files to remove, replace or weaken certain elements of the proposal. We would like to briefly explain why that would be highly damaging to its effectiveness and life-saving potential.

Speed Limit Information (SLI) is not an effective alternative to Intelligent Speed Assistance (ISA)

ACEA, representing car manufacturers, has said that a system that simply displays the speed limit on the dashboard, is an “effective alternative” to Intelligent Speed Assistance (ISA). That is not true.

ISA systems, which are already available on a range of vehicles sold today, actually intervene to help drivers keep to the speed limit. The system works by limiting engine power when the speed limit has been reached. The system is overridable, usually by simply depressing normally, but further down than usual, on the accelerator pedal. The driver retains ultimate control over vehicle speed at all times.

According to the UK Transport Research Laboratory (TRL), who also researched the effectiveness of the Commission’s proposed measures in a special study for ACEA, SLI is **not** as effective as ISA. TRL says that if today’s EU fleet was fitted with SLI, there would be 1300 more deaths every year than if ISA was fitted.

ACEA, together with FIA – representing drivers’ groups - also claim that ISA systems are not accurate enough. However an on-road test by ADAC, a German drivers’ club, found that the system was found to be 90% accurate, including the ISA system launched by Ford Europe in 2015. Mobileye, a maker of the sign recognition technology used in many ISA systems, says the state-of-the-art system today is 95% accurate in the majority of EU member states.

ISA systems can combine sign-recognition with digital speed limit maps, which improves overall accuracy significantly. TomTom, a major supplier of digital maps, recently reached a milestone of 1.5 billion updates a month. As all new types of car sold in Europe have mobile network connections thanks to the EU’s eCall system, real-time over-the-air updates are available today, and will become the norm.

The FIA has also said that ISA systems are not accurate in the rain. But the basis of this claim was a single experimental study of a sign recognition system carried out in Malaysia that did not even look at speed signs. In any case, an ISA system could be automatically deactivated by the vehicle in the unlikely event of accuracy being compromised by weather or infrastructure issues. Systems available today already work in this way.

Speed is the primary factor in 1/3rd of all road collisions and a contributing factor in most others. In the General Safety Regulation, ISA, by reducing speeding, will complement other active safety systems such as automated emergency braking and also reduce the forces that crash protection measures need to absorb in the event of a collision.

Passive safety (crash protection) measures must not be deprioritised now or in the future

The Commission’s proposal includes a number of passive safety improvements, to ensure that passengers in the vehicle, as well as other road users outside the vehicle are physically protected in the event of a collision. Carmakers have argued that “active safety” should take priority because systems like AEB will make collisions less likely.

Active safety developments should be welcomed, but not at the expense of passive safety. Automated systems can and will fail, and some collisions will be unavoidable. Passive safety

technology is the critical backup in vehicle safety, and will remain essential for the foreseeable future.

Heavy vehicles need direct vision standards, just as cars and vans do today

When drivers can see more of the road space around their vehicle directly, without relying on a monitor or mirror, reaction times are faster and more collisions can be avoided. And yet heavy vehicles such as buses and lorries do not have minimum “direct vision” standards today whereas cars and vans do. That needs to change.

Direct vision standards for lorries and buses, as proposed by the Commission, will also complement sensor-based systems for detecting vulnerable road users around the vehicle. But they should not be seen as a replacement. Sensor systems can fail, or be damaged while in use. Again direct vision offers an important vehicle safety backup and will play an important role, particularly in an urban context, for the foreseeable future.

The European Commission has proposed that cars and vans be fitted as standard with Event Data Recorders (EDR), sometimes known as Accident Data Recorders. But these devices are crucial for collision investigation and analysis and so should also be fitted to all new lorries and buses.

A call to support the Commission’s full package of vehicle safety measures

In conclusion, we would like to ask you, and your colleagues on the IMCO committee to support the full package of measures proposed by the European Commission. Cherry picking will harm the overall effectiveness because of the way the systems and passive safety measures work together.

As this Parliament’s mandate draws to a close, we urge you and your colleagues to take this historic, once-in-a-generation opportunity to reduce deaths and serious injuries on our roads.

Yours sincerely,

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William Todts, Executive Director, Transport & Environment (T&E)

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