



EUROPEAN CITIES AND REGIONS NETWORKING
FOR INNOVATIVE TRANSPORT SOLUTIONS



European Transport Safety Council



3 February 2016

Dear Commissioner

We are writing to urge you to **include ambitious direct vision requirements for heavy duty vehicles** (HDVs) in your current **review of the General Safety** (GSR, EC/661/2009) and **Pedestrian Safety** (PSR, EC/78/2009) **Regulations**. Mandating new frontal truck design will greatly improve urban road safety across Europe and contribute to the achievement of the EU target to halve the number of road deaths by 2020.

Whilst representing only three per cent of vehicles on our roads, lorries are involved in a disproportionate number of collisions (over 15%) killing more than 4000 people each year¹. The majority of these occur in densely populated urban areas such as cities. For example in London, 55 per cent of all bicycle deaths between 2008 and 2013 involved an HDV, despite HDVs making up just four per cent of London's road miles; 20 per cent of pedestrian fatalities in 2013 involved an HGV in the city.

This clearly shows the need to improve truck safety, in particular by eliminating blind spots and stimulating new low entry high vision cab designs. Eurocities and Polis – key stakeholders representing cities in Europe – have long been active on urban safety, through our work on the Weights and Dimensions Directive in particular². The recent agreement on this (directive EU/2015/719) was an important milestone in this regard; it grants voluntary derogations on the maximal lengths to make HDVs safer and more fuel efficient.

The European Commission should now build on this achievement and mandate a new direct vision standard as a technical specification for lorries in the General Safety Regulation. Such a standard ought to build upon the previous body of research on this, e.g. the Loughborough University³ FKA concept by incorporating its main features:

1. Low entry cab design to allow for bigger windscreens and better driver position that reduce blind spots around the cab and thus prevent many turning collisions in cities

¹ <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52013SC0108&from=EN>

² <http://www.polisnetwork.eu/uploads/Modules/PublicDocuments/safer-cleaner-lorries-now---joint-declaration.pdf>

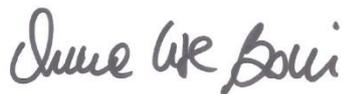
³ <https://dspace.lboro.ac.uk/dspace-jspui/handle/2134/15922>

2. Rounded shape of a crumple zone to prevent run-overs of cyclists and pedestrians, which would significantly improve the likelihood of survival of low speed collisions in urban areas
3. A more energy absorbing crash box (e.g. eaFUP standard) to reduce impacts of crashes on car users in particular

The recent TRL study⁴, prepared specifically for the current review of GSR and PSR, has concluded that safer HDV front-end design for improved direct vision is cost-beneficial, saving almost one thousand lives a year. Furthermore, mandating lorry direct vision specifications through the GSR would – through economies of scale – greatly reduce the cost of new cabs. While different standards might be considered for long-haul and construction categories of HDVs, particular focus should be given to urban logistics trucks responsible for the majority of accidents in cities.

We therefore call on you to include technical specifications on direct vision requirements for HDVs in the current review of the GSR, as this would significantly reduce fatal accidents among all vulnerable road users in the future.

Yours Sincerely



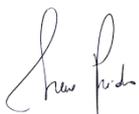
Anna Lisa Boni, EUROCITIES Secretary General



Antonio Avenoso, ETSC Executive Director



Andrea Colombo, Deputy Mayor for Transport and Mobility, Municipality of Bologna
POLIS Road Safety Working Group Chair

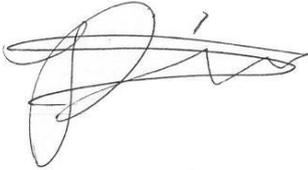


Irene Priolo, Councillor for Infrastructures and Mobility, Metropolitan City of Bologna
POLIS Road Safety Working Group Chair

⁴ <http://bookshop.europa.eu/en/benefit-and-feasibility-of-a-range-of-new-technologies-and-unregulated-measures-in-the-field-of-vehicle-occupant-safety-and-protection-of-vulnerable-road-users-pbNB0714108/?pgid=lq1Ekni0.1ISR00K4MycO9B00005RxjsFsg;sid=bWoc4U7>



Karen Vancluysen, POLIS Secretary General



Jos Dings, T&E Executive Director

CC: Gwenole Cozigou, Director, Directorate C, DG Grow

Joana Szychowska, Head of Unit C4, DG Grow

Antony Lagrange, Unit C4, DG Grow

Peter Broertjes, Unit C4, DG Grow