

Towards a European road safety area: policy orientations on road safety 2011-2020

Communication from the Commission¹

ACEA comments

ACEA, the European Automotive Manufacturers Association, welcomes the release of the Commission's Communication "**Towards a European road safety area: policy orientations on road safety 2011-2020**" on 20 July 2010 that will set the policy priorities in road safety for the next decade.

Innovation and Responsibility, the long-standing safety commitments of the European automotive industry

The European auto industry is leading in safety technologies worldwide and consistently sustains high investments in ground-breaking R&D. With over €6 billion invested in R&D each year, of which a large proportion is dedicated to developing further initiatives to enhance the passive and active safety features of new vehicles, the ACEA members are the largest private investors in R&D in Europe. ACEA has a long track record regarding road safety, based on innovation and responsibility.

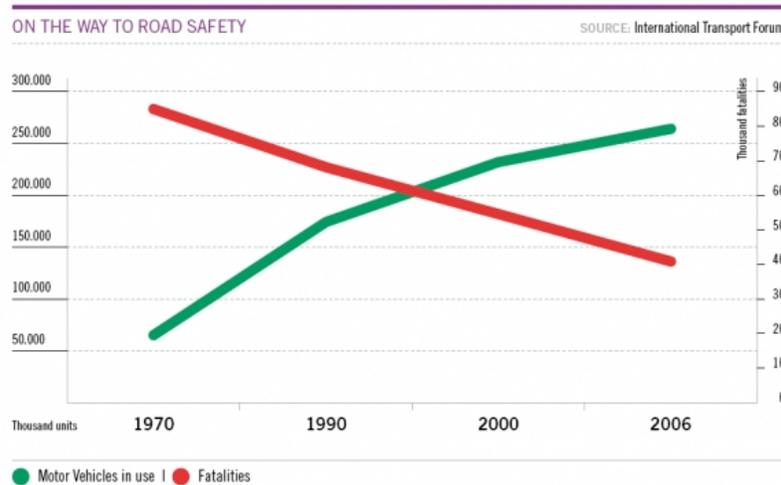
The European automotive industry is a keen supporter of the EU objective to reduce road fatalities. Over the past decades, so-called passive safety systems such as seatbelts and airbags have played a major role in road casualty reduction and the technologies involved have been constantly further improved. Many 'active' safety features including ABS and electronic stability control are now increasingly being fit as standard as well.

The European industry will continue playing its role to contribute to the reduction of road accidents and will remain at the forefront of progress in technology innovation. The automotive industry believes that an Integrated Approach, in which all stakeholders play their part, is however of utmost importance. Significant efforts must be put in improving both the infrastructure and consumers' behaviour. At the same time, improvements of the traffic circumstances with intelligent and well-designed infrastructure need to be made. The national and local authorities also have an important role to play by improving the education and enforcement of road traffic rules.

¹ COM(2010) 389 final

Thanks to vehicle technology we have seen a dramatic decrease in fatalities despite increase in traffic volume

In the last 30 years, vehicle technology has helped halve the number of fatalities, despite a three-fold increase in traffic volumes on European roads. A commitment to road safety remains central to all vehicle makers' development plans.



Affordability of new vehicles, especially in new Member States, remains an essential element of road safety policy. Measures to drive fleet renewal are to be encouraged since the average age of cars in some countries can be up to 16 years. Replacing less safe older cars from the fleet will help, but again, so too will improvements in infrastructure, enforcement and driver education.

The European Automotive Industry welcomes the Integrated Approach advocated by the Commission

An Integrated Approach is indeed the solution, but such an approach needs to be actually implemented. The industry welcomes the clear recognition by the Commission in its Communication for the first time that an Integrated Approach to road safety is key for achieving the EU road safety targets. Unfortunately, this is not, in our opinion, fully reflected in the measures that are put forward in the document. Indeed, the only binding measures in the Communication refer to technical measures for vehicles.

Safety is indeed a shared societal responsibility underlined by the fact that 95% of all accidents are caused by driver error, such as poor anticipation, inappropriate reaction to a hazard and infringement of road traffic laws. Combining further improvements in road infrastructure and vehicle technology with complementary ITS measures, improved driver training, better road design and enforcement of existing traffic regulations promise the greatest benefits to society.

Whereas only one of the seven objectives identified by the Communication refers to safer vehicles, the Commission announces actions related to vehicle technical measures in four out of the seven objectives, namely:

1. The introduction of speed limiters in LCVs

A proper impact assessment identifying the real world safety benefits is a pre-requisite before proposing the introduction of speed limiters devices in LCVs .

This assessment needs to take actual traffic participation and mileage of these vehicles into account. The most substantiated analysis about N1-vehicle involvement into road accidents has been conducted since 2004 by the BASt (*Bundesanstalt für Straßenwesen – Federal Road Research Institute*) in cooperation with the DEKRA (*Deutscher Kraftfahrzeug-Überwachungs-verein*) and the UDV (*Unfallforschung der deutschen Versicherungen – Accident research from German insurers*). In relation to the entirety of accidents the involvement of N1-vehicles is comparatively low – this holds true also for motorways. The accident risk for N1-vehicles on motorways and country roads, related to mileage, is approximately equal to that of passenger cars.

In fact, it becomes clear that merely 3 % of all investigated accidents have occurred in speed ranges above 120 km/h. Moreover, approximately 56 % of accidents involving light commercial vehicles between 2,8 t and 3,5 t take place in urban areas. About 1 / 3 of accidents happen on country roads and only 13 % on motorways, although the latter accounts for almost 30 % of N1-vehicles' mileage.

2. Making use of alcohol interlocks devices obligatory

The installation of alcohol interlocks' systems should not be mandatory for all drivers, since it is not justified that the majority of drivers who behave correctly have to bear the cost and discomfort of a system that only a minority needs.

ACEA is in favour of defining a standard interface on the vehicle in order to open the possibility to install aftermarket alcohol interlock devices on board for drivers who wish to do so. However, the alcohol interlock should not be installed as a standard feature in the vehicle; it should only be installed in cases where the driver's behaviour demands it. Policy makers are responsible for defining a legal framework in which alcohol interlocks can actually play a role. In that respect, we still see the need for research at a European level, especially to understand how alcohol interlocks can be used in a cost effective way.

3. Proposals concerning active and passive safety on electric vehicles

The safety of the customers is the primary concern of vehicle makers. Vehicle makers are already designing electric vehicles to fulfil existing safety regulation (passive, active and electrical requirements). With the transposition of UNECE R100 into EU legislation and the update of UNECE R12, R94 and R95, the electric vehicles launched into the EU market will have to comply with high standards of safety. There is no need for additional European regulation in this regard. The potential safety concern created by the lack of

noise of electric vehicles is currently dealt with by the appropriate regulatory forum, which is expected to finalize its work in the course of 2011-2012.

4. Proposals in view of harmonising and strengthening roadworthiness test and technical roadside inspections

ACEA believes the current level of Periodic Technical Inspection (PTI) defined in most EU countries is sufficient. The introduction of additional measures is only possible when full impact assessments have been carried out and real world benefit can be demonstrated.

However, a reduction of administrative burden and increase in fair competition for citizens, tool providers, and transportation companies, could be achieved by ensuring standardized PTI requirements throughout Europe.

Roadside inspections are considered by ACEA to be positive additional tests to increase road safety. ACEA considers them to be especially useful with regard to vehicles which could be a hazard to traffic safety, when relevant safety requirements (especially the sub standard condition of tyres and brakes) are not fulfilled. Furthermore, they can also identify incorrect loading of trucks and drivers who do not comply with driving hours' legislation.

5. Evaluate the feasibility of retrofitting CVs and PCs with ADAS

ACEA is open to evaluating the feasibility of retrofitting commercial vehicles and passenger cars with ADAS, although it must be understood that we are considering highly complex systems integrated mechanically and electrically in the vehicle. As an example, Adaptive Cruise Control is integrated with engine management, gearbox and braking systems. Moreover, sensors need accurate installation in order to guarantee robust and reliable functioning to deliver acceptable levels of performance from the user's point of view.

6. Accelerate the deployment of eCall and consider its extension to other vehicles

ACEA has always actively contributed to the discussion on a possible introduction scenario for eCall. However, a number of key prerequisites for the introduction remain yet to be solved, such as the relevant upgrade of the infrastructure in the 27 EU Member States prior to introduction of the eCall technology in all new type-approved vehicles. The industry requires sufficient lead-time for development and testing once the whole rescue chain is in place to check final functionality.

Discussions between the European Commission and the European automotive industry on the introduction of eCall have always focused on eCall for passenger cars up to 3.5 t. The reason for excluding trucks and buses is that the current eCall system builds on airbag deployment notification. The penetration rate of airbags in trucks is, however, rather low. An eCall system makes sense primarily if such a system can be automatically triggered in the event of an accident. However, in the majority of cases the truck-trailer unit does not even register the impact of a rear or side crash due to the weight differences between

HDV and other vehicles. The development of alternative crash sensor systems is highly complex, does not only take many years but is critical per se as trucks are linked with trailers. The question where to best put crash sensor systems remains unanswered, which requires detailed accident analysis assessments and cost-benefit analysis of the systems. Trucks and buses do not generate more accidents than passenger cars; accidents are only more spectacular when they happen.

Professional Fleet Management Systems follow the location of a truck constantly so that even manual eCall is covered by normal or (smart) mobile phone systems (almost 100% penetration) without the need for an additional integrated system.

7. Proposals for developing technical standards for the protection of VRUs

The pedestrian protection directive, with its implementing phases, defined a road map which is still valid and under implementation. The effects of this directive in terms of fatalities and injuries are already noticeable and will increase in the next years. These efforts can be accelerated if innovative approaches will be taken into consideration. Besides the worldwide discussions in relation to the safety aspects to VRUs related to the minimum exterior noise of hybrid and electric vehicles an active sound emission may seem the most pragmatic way. Europe is working on an “accident prevention” program for pedestrians with the goal to have no collisions between pedestrians and cars in the future. The EU-Directive 78/2009/EC is inviting vehicle manufacturers to come forward with proposals for collision prevention systems in general (Article 11 of 78/2009) which offer a huge contribution to this efforts in the future.

8. Examine the added value of developing and installing event data recorders in commercial vehicles

There is no evidence that event data recorders will contribute to reduce road accidents. Any future examination of the added value of these recorders will need to take into consideration data protection and privacy issues.

Education and enforcement

ACEA strongly supports training programmes promoting best practice such as eco-driving, safe driving, anticipatory driving style and the importance of vehicle maintenance. In addition, commercial vehicle operators are also required to undergo professional competence assessments every five years.

However the reality is that for many car owners the only learning/training experience is when passing their driving test. Inappropriate speed, drink driving, driving while tired, not wearing seatbelts and driving under the influence of drugs are some of the most common causes of road accidents. These could be avoided with proper behavioural training, education and enforcement. Prior to training new motor vehicle drivers, it is crucial to ensure that young people learn correct behaviour as road users, (pedestrians and cyclists). This can only be achieved if learning starts at school.

Furthermore, the advent of advanced driver assistance systems in vehicles is potentially changing the way the driver interacts with the vehicle. This may lead to new challenges

for driver training. The public and private sectors should work together to encourage appropriate driver training.

Consumer Campaigns

The industry is an active participant in the “eSafetyAware” and specifically the “Choose ESC” campaign, which creates awareness and understanding of the benefits of specifying the vehicle stability technology. More than 50% of new cars now come fitted with ESC as standard, and that number will continue to rise as ESC is mandatory for the type vehicles as of 1 November 2011 and new registrations as of 1 November 2014.

Affordability is always important for our consumers, but even more in these times of economic recovery. The additional cost for electronic safety equipment often competes with comfort features for limited budgets.

Road Infrastructure

ACEA is a strong supporter of the EuroRAP road assessment programme. As part of an integrated approach to accident reduction, improvements in design, construction and maintenance of roads are key.

Issues like bottlenecks, blind corners, signals readability, inappropriate speed limits and poor lighting can all affect safety. Unfortunately, in its previous road safety strategy, the European Commission has tended to overlook essential infrastructure measures such as audits, impact assessments and safety mappings.

Manufacturers also point to the wealth of information available at local level, which urgently needs to be shared with digital map providers to improve quickly the road safety database. On and off-board navigation systems, for example, could then include more reliable geo-referenced road traffic data for drivers.

About ACEA

The European automotive industry is key to the strength and competitiveness of Europe. The ACEA members are BMW Group, DAF Trucks, Daimler, FIAT Group, Ford of Europe, General Motors Europe, Jaguar Land Rover, MAN Nutzfahrzeuge, Porsche, PSA Peugeot Citroën, Renault Group, Scania, Toyota Motor Europe, Volkswagen Group, Volvo Cars, Volvo Group. They provide direct employment to more than 2.3 million people and indirectly support another 10 million jobs. Annually, ACEA members invest over €26 billion in R&D, or 5% of turnover