



European
Automobile
Manufacturers
Association

ACEA Position Paper

The European Commission proposal on the revision of the General Safety Regulation



October 2018

Introduction

The European Automobile Manufacturers' Association (ACEA) is a strong supporter of the EU objective of reducing road casualties. ACEA thus welcomes the European Commission's initiative to revise the current safety regulations, with the aim of introducing measures that have the potential to substantially reduce the number of accidents and related injuries.

Despite a three-fold increase in traffic, road safety in Europe has improved significantly in the last 30 years. Maintaining this trend is important for an industry that prides itself on designing, producing and selling safe, comfortable and efficient vehicles in probably one of the most demanding markets in the world.

In March 2018, ACEA published its first position paper on the revision of the General Safety Regulation¹. Following the publication of the European Commission's proposal on 17 May 2018, this new paper complements the ACEA position from March 2018 by setting out ACEA's views on the measures proposed by the Commission.

Active safety measures have greater potential to reduce road casualties

Following the positive contribution of passive safety systems during the last few decades to mitigating the consequences of accidents, active safety measures now offer huge potential to further improve road safety.

In order to assess this potential, a detailed analysis of UK and French accident statistics has been carried by the Transport Research Laboratory (TRL)² and Centre Européen d'Etudes de Sécurité et d'Analyse des Risques (CEESAR).

This independent analysis shows that active safety measures can further reduce the number and consequences of accidents, while passive safety measures have fewer benefits than active ones. Passive safety measures may also have negative impacts, such as driving up CO₂ emissions.

Therefore, whenever different measures can provide benefits in a certain accident scenario, active/preventative measures should take priority in most cases, since they can deliver greater benefits and/or avoid accidents completely, rather than simply mitigating their effects (which is what passive safety measures do).

Synergies between different safety measures with an effect on the same type of accidents must also be considered. Solving the same problem twice will not reduce road fatalities. This is important when multiple measures are under consideration, as is the case with this revision of the General

¹ ACEA Position Paper: General Safety Regulation Revision, March 2018: <http://www.acea.be/publications/article/position-paper-general-safety-regulation-revision-2018>

² Effectiveness estimates for proposed amendments to the EU's General and Pedestrian Safety Regulations, May 2018: <https://trl.co.uk/reports/effectiveness-estimates-proposed-amendments-eus-general-and-pedestrian-safety-regulations-o>

Safety Regulation. In defining and evaluating the potential benefits of each measure, their influence on other measures needs to be taken into account.

For instance, when addressing vision-related accidents with trucks, the accident analysis shows that active safety systems are more effective in reducing fatalities and injuries than passive measures, such as low-entry cabs for trucks. VRU-AEB systems (active emergency braking systems for pedestrian or cyclists) can reduce the population of fatalities by 1.53% compared to only 0.95% in the case of low-entry cabs.

Finally, requirements need to consider the different usage and characteristics of vehicles. Passenger cars, light commercial vehicles, heavy trucks and buses are not the same; they each face different industrial constraints, such as development cycles, and market demand. Accordingly, safety requirements for trucks cannot be the same as those for passenger cars.

ACEA's position on the solutions and systems proposed by the Commission

The table below provides an overview of the solutions and systems proposed by the European Commission, as well as ACEA's position on each of those. It is important to note that the ACEA position is based on the earlier-mentioned independent accident analysis; focussing on the most effective solutions but also identifying solutions/systems that are obsolete because other technologies already address the same type of accidents.

Solution/system proposed by the European Commission	ACEA position	Comments
Pedestrian and cyclist enlarged head impact zone (M1, N1)	Instead of the enlarged head impact zone, ACEA recommends automated emergency braking.	Automated emergency braking addresses Vulnerable Road User (VRU) protection much more effective than an enlargement of the head impact zone. This is proven by the accident analysis.
Advanced emergency braking for pedestrians and cyclists (M1, N1)	ACEA supports the Commission proposal, as advanced emergency braking systems are very effective.	
Lane keeping system (M1, N1)	ACEA supports the Commission proposal, provided that lane departure warning is	The requirement should be technology neutral, or at least leave it up to the manufacturer to choose the most appropriate system, as there is no evidence that emergency lane keeping is

	added as an alternative.	more effective than lane departure warning.
Direct vision heavy-duty vehicles (M ₂ /M ₃ , N ₂ /N ₃)	ACEA could support the Commission proposal for new-type cabs and bus bodies, if the comments on the right are taken into consideration.	Direct vision is supported for new-type cabs and bus bodies as well as within existing vehicle concepts (no low-entry trucks), based on a newly-requested vision standard that follows a holistic approach (ie direct visibility, mirrors, cameras and detection systems).
Vulnerable Road User (VRU) Detection	ACEA supports the Commission proposal for M ₃ /N ₃ vehicles.	According to accident research, VRU detection (ie warning) is a very effective safety system for M ₃ /N ₃ vehicles.
Intelligent speed assistance (M ₁ -M ₃ , N ₁ -N ₃)	Instead of intelligent speed assistance, speed limit information is suggested as an effective alternative (requirements should focus on the performance).	The current performance of intelligent speed assistance would not be accepted by customers (eg too many false warnings due to incorrect speed limits on road signs, etc). Hence, the infrastructure should be updated first.
Drowsiness and attention detection (M ₁ -M ₃ , N ₁ -N ₃)	ACEA supports the Commission proposal.	
Advanced distraction recognition (M ₁ -M ₃ , N ₁ -N ₃)	Instead of advanced distraction recognition, the measures mentioned in the box on the right are supported by ACEA instead.	There is no reliable technology available to clearly identify a distracted driver. Texting during driving should be addressed via enforcement, automated emergency braking, lane keeping systems and driver education, which are effective alternatives.
Alcohol interlock installation facilitation (M ₁ -M ₃ , N ₁ -N ₃)	ACEA supports the Commission proposal.	The system entails a standardised information data set facilitating the fitment of aftermarket alcohol-interlock devices in motor vehicles.
Tyre pressure monitoring system (M ₁ -M ₃ , N ₁ -N ₃)	ACEA supports the Commission proposal for M ₁ , N ₁ .	The requirement should be technology neutral and allow for direct and indirect systems. For M ₂ /3 and N ₂ /3, ACEA does not support the requirement as there is no evidence (eg studies) of the safety-

		benefit of the system.
Reversing detection (M1-M3, N1-N3)	ACEA supports the Commission proposal (except for N3).	In the case of N3 vehicles, the truck-trailer combination is complex and cost/benefit should be evaluated in detail.
Frontal off-set impact (vehicles <= 3,5t; M1, N1)	ACEA does not support the Commission proposal.	Heavier vehicles already have a high level of occupant protection according to the accident analysis. Risks jeopardising the safety of smaller cars.
Frontal full width impact (M1, N1)	ACEA supports the Commission proposal.	Introduction of the Thor dummy depends on availability.
Side impact (including vehicles with R-point > 700mm; M1, N1)	ACEA does not support the Commission proposal.	Heavier vehicles already have a high level of occupant protection according to the accident analysis.
Rear impact (M1, N1)	ACEA supports the Commission proposal.	
Emergency stop signal (M1-M3, N1-N3)	ACEA supports the Commission proposal.	
It shall be possible to switch off systems only one at a time, and only at standstill with the parking brake engaged, by a complex sequence of actions to be carried out by the driver.	ACEA strongly recommends that it should remain possible to switch off safety systems when necessary (see also UNECE regulation).	There are still specific situations in which systems have to be switched off. There is no evidence, eg based on the truck accident analysis, that safety systems are often switched off.

All measures must be harmonised with the provisions of the UNECE regulations and sufficient implementation time must be guaranteed

The United Nations Economic Commission for Europe (UNECE) is an international body that develops global regulations in the area of vehicle safety, among others. Therefore, new requirements that are the outcome of the revision of the EU General Safety Regulation should be implemented via UNECE in order to avoid heterogenous regulation. Likewise, specific EU regulations must be avoided when the UNECE already is in the process of defining technical requirements. With this in mind, requirements for 'switching off' systems should take into account that these are already defined in the UN regulations.

Safety measures are a critical part of every vehicle. They require sufficient time to be properly developed in order to guarantee correct functioning. Moreover, only once the final requirements have been officially published, manufacturers can start developing these safety systems. Hence, the transition time must be aligned with product development time, allowing at least three years for new vehicle types from the date the regulation has entered into force and the final requirements are available. In addition to that, delegated acts shall be published at least 24 months before their application. Concerning direct vision, the transitional provisions should be kept till 2035.

Importance of an integrated approach to road safety

Any approach needs to consider actions related to vehicles, infrastructure and driver behaviour in an integrated way. There has to be an appropriate policy mix, combining regulatory and other measures, defined on the basis of an in-depth impact assessment. In that spirit, ACEA welcomes the initiatives in the Commission's Third Mobility Package that seek to help member states with systematically identifying dangerous road sections and better targeting investment to address these problems.

The impact of the General Safety Regulation revision on other European policy priorities must also be considered, for example the impact of passive safety measures on vehicle weight and consequently CO₂ emissions. Indeed, passive safety measures add weight to vehicles, which is detrimental to reducing CO₂ emissions in parallel.

Automated driving

Automated driving holds great potential to further improve road safety in the near future. Hence, ACEA welcomes the Commission's initiative to support European manufacturers that want to introduce such cutting-edge technology. With the implementation of larger-scale use of automated vehicles in the future, accidents can be further reduced or at least mitigated, as this kind of vehicle (especially those with higher automation levels) will be well equipped with sensors and evaluation equipment. These developments will also reduce the need for certain road safety measures planned for the near future.

With that mind, ACEA recommends that the revised General Safety Regulation should focus on defining performance criteria rather than dealing with technology-specific issues.



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ABOUT ACEA

- ACEA represents the 15 Europe-based car, van, truck and bus manufacturers: BMW Group, DAF Trucks, Daimler, Fiat Chrysler Automobiles, Ford of Europe, Honda Motor Europe, Hyundai Motor Europe, Iveco, Jaguar Land Rover, PSA Group, Renault Group, Toyota Motor Europe, Volkswagen Group, Volvo Cars, and Volvo Group.
- More information can be found on www.acea.be or [@ACEA_eu](https://twitter.com/ACEA_eu).

ABOUT THE EU AUTOMOBILE INDUSTRY

- 13.3 million people – or 6.1% of the EU employed population – work in the sector.
- The 3.4 million jobs in automotive manufacturing represent over 11% of total EU manufacturing employment.
- Motor vehicles account for some €413 billion in tax contributions in the EU15.
- The sector is also a key driver of knowledge and innovation, representing Europe's largest private contributor to R&D, with €54 billion invested annually.
- The automobile industry generates a trade surplus of €90.3 billion for the EU.