



A C E A

Respecting the Rules Better Road Safety Enforcement in the European Union

Commission's Consultation Paper of 6 November 2006¹

ACEA's Response

December 2006

1. Introduction

ACEA (European Automobile Manufacturers Association) represents the interests and views of the thirteen major European car, truck and bus manufacturers. All ACEA member companies are key global players and have integrated operations in the European Union. They produce nearly twenty one million units with a turnover of over €450 billion. They employ over two million people directly and around twelve million people rely for their livelihood on the automotive sector in Europe.

A large proportion of the €20 billion that the European automotive industry spends annually on research and development is dedicated to developing further initiatives to enhance the passive and active safety features of new vehicles.

ACEA welcomes this opportunity to comment on the better road safety enforcement consultation paper. Protecting the safety of both vehicle users and pedestrians is a key priority for automotive manufacturers. Signatory to the European Road Safety Charter, ACEA has a long track record regarding road safety, based on innovation and responsibility. While the number of casualties has been significantly reduced in the past thirty years, vehicle makers are determined to support efforts to further reduce casualties and injuries associated with road use and to contribute to the EU target to halve the number of fatalities by 2010.

The contribution that automotive manufacturers can make through changes to vehicle is, however, only one part of the integrated approach that is required to fully address the issue of road safety.

¹ Respecting the Rules, Better Road Safety Enforcement in the European Union, A Consultation Paper, European Commission, 6 November 2006

2. Do you agree with the definition of the problem and the objectives of the intended EU actions?

ACEA agrees with the definition proposed by the Commission of the problem and the objectives of the intended EU actions.

Indeed drivers cause most road accidents. Therefore driver education and continuous information campaigns complemented by enforcement of the existing rules are key instruments to achieve a safer road environment. An assessment of the main accident causes points clearly to the fact that much of the safety improvement, for which the Community is striving, could be achieved simply by a effective enforcement of already existing rules.

ACEA is convinced that better enforcement is an efficient and cost-effective means to help reach the target of reducing the fatalities of European roads by 50% by 2010.

Europe's vehicle manufacturers have always promoted the integrated approach to road safety as the most efficient and sustainable way to achieve positive results. In spite of a further strong increase in road traffic, the continuous improvements to vehicle passive and active safety have resulted in an impressive decline in road casualties. Further reductions, however, can only be achieved through an integrated approach. This requires not only even safer vehicles but also safer infrastructure, improved driver skills and behaviour, better enforcement of existing legislation and the interaction and networking between all of them.

It is clear that passive vehicle safety can still deliver some improvements. But it is becoming increasingly clear too that returns are diminishing and that a new approach is needed. Vehicle makers know from their research that the full potential of casualty reduction will only be possible if a more integrated approach was taken addressing not only vehicles but also infrastructure design and drivers' behaviour including better enforcement. While a great deal of improvements has been made to vehicles and some action has been taken on infrastructure, little has been done on better enforcement. ACEA, therefore, agrees with the Commission assessment that it is now time to integrate the three lines of action and pay more attention to better enforcement of existing traffic legislation.

In this context, the approach adopted by CARS21² can be seen as a good step to becoming part of the Commission's general thinking. Applying the CARS21 conclusions, infrastructure improvements, driver initiatives and better enforcement of existing measures, which currently fall behind vehicle related activities, could be reinforced to ensure that all stakeholders make the necessary contribution to achieving the sought-after casualty reductions.

² The CARS 21 High Level Group launched by Commissioner G. Verheugen in 2005 has examined the major policy areas which impact the competitiveness of the European automotive industry and has agreed on a number of recommendations which aim to enhance the industry's global competitiveness and employment while sustaining further progress in safety and environmental performance at a price affordable to the consumer.

CARS 21

Recommendation no. 12

.../...

Road user-related measures

- .../...
- *Organise and facilitate increased co-operation among Member States to ensure improved cross-border infringement enforcement*
- *Improve the enforcement of alcohol and possibly introduce a maximum alcohol level for novice-and professional drivers*
- *Improve the enforcement of speed limits*
- *Promote and improve the enforcement of seat-belt use and motorcycle helmet use.*

The Group, while stressing the possible EU role in promoting better enforcement, education and infrastructure planning, acknowledges that responsibility for the implementation of several infrastructure and user-related measures rests with the Member States. The Group recommends that a monitoring and evaluation of road safety activities in individual Member States should take place regularly and its results communicated to the stakeholders.

The automotive industry therefore welcomes the Commission's intention to propose a Directive on better road safety enforcement in the European Union in 2007.

3. Should EU actions be limited to the Trans-European Road Network or cover all EU roads ?

EU actions on better enforcement should not be limited to the Trans-European Road Network. They should cover all EU roads. The Trans-European road network is almost entirely made up of motorway or similar grade roads. These are the safest roads. These roads are not where the majority of fatalities occur. Most of the casualties occur on single carriageway roads outside urban areas. It is clear that the measures proposed must not apply only to the Trans-European road network. Member States must carry out the enforcement of traffic legislation on all EU road networks, irrespective of whether or not they are part of the Trans-European Network. To limit the applicability of the requirements to the roads which are already the safest would pass up a major opportunity to save lives.

4. Should EU actions be limited to the three main traffic offences responsible for road accidents and deaths namely speeding, drink-driving and non-use of seat belts, or should they cover all traffic offences?

It seems clear from various research that the main causes of accidents remain speeding, the non-wearing of seat belts and helmets and alcohol/drugs/fatigue. It is important that the Commission is nevertheless aware that better law enforcement will not help in cases of inappropriate speed.

ACEA supports the EU action, which, in line with CARS 21 Recommendation no. 12, encourages road users to improve their behaviour by complying with basic road safety rules, and this applies especially to respecting applicable speed and alcohol limits and wearing seat belts, since these offences are the three main causes of fatalities on the road. ACEA would, however, support EU action encouraging Member States to extend such enforcement to all traffic offences. In addition, European Vehicle Manufacturers want to underline the close link between enforcement and road users' behaviour, including the behaviour of motorcycle users. It is worth noting that statistics show an increase of casualties where motorcyclists are involved. Here, respect of speed limits and motorcycle drivers' behaviour are important issues. Given the importance of drivers' training and education in road safety, ACEA would welcome further EU action in that field too.

5. Which one of the described policy options would have your preference? Do you have any specific comments related to implementation issues?

In the light of the answer to question 2, ACEA cannot agree with all the defined policy options. In view of the clear role that better enforcement of traffic legislation has in identifying and implementing cost-effective corrective measures, the "business as usual policy" is not an option. The clear benefits that can be achieved in casualty reduction are such that action must be pursued to realise these reductions. The debate must not be on whether, but how this is best done.

Only options 5.2 to 5.5 of the consultation paper outline possible approaches for action.

Vehicle manufacturers are convinced that the basis for the optimum solutions are proper harmonised enforcement methods and measures implemented by Member States as established by a regulatory framework. This has been the case for vehicles for many years so the same benchmark solutions should now be applied to enforcement. This may cause problems for Member States but they must take their share of the responsibility for the casualty reduction targets that they themselves have signed up to. It is true that some corrective measures could require some investment but this is not universally the case. There are many quite inexpensive measures that could be undertaken as a first step that would save many lives.

It is well known that the Commission had been expecting better results from the 2004 Recommendation on enforcement in the field of road safety. It is now time to bring forward a binding measure with stringent requirements. If there were no possibility of success for a stringent proposal then the adoption of one of the options from 5.2 to 5.5 would be very much a second best solution.

6. Are there policy options than those described in this paper that you would like to suggest?

No.

7. Do you have specific comments on the costs and benefits of the different instruments/measures?

It is true that some expenditure would be required but this must not be an excuse to veto all measures. EU Member State governments collect €360 billion from road users. It is unacceptable that only a small fraction of this sum is reinvested in better enforcement of traffic legislation in the road network.

Traffic law enforcement, in combination with awareness raising activities, is essential in order to reach the EU target of halving annual road deaths by 2010. The effective enforcement of road safety rules would lead to a reduction in deaths and injuries in a very cost-effective way. It goes without saying that enforcement is an efficient and cost-effective mean to reduce fatalities as long as it does not require additional vehicle technical features.

8. Is there any other comment you wish to make?

Following the identification of a series of the priority measures as included in Recommendation no. 12 of CARS21, the importance of the measures in the different pillars (vehicles, infrastructure, drivers behaviour) should be outlined and they should be progressed in parallel so as to maximise the impact of the integrated approach. Effective public benchmarking and evaluation processes for monitoring Member States' progress in the field of enforcement should be established. This would serve as a useful way of reducing the risk that steps taken by the automotive industry were not matched by corresponding progress in other parts of the integrated approach.