



ETSC Response to the European Commission White Paper
“Roadmap to a Single European Transport Area –
Towards a competitive and resource efficient transport system”

June 2011

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Introduction

ETSC welcomes the new White Paper on Competitive and Resource Efficient Transport. In this response ETSC looks in Part 1 at the specific actions related to road safety and in Part 2 analyses the different measures presented that will also have an impact on road safety. It suggests areas for improvement and additions for saving lives on Europe's roads.

Part 1 Road Safety Actions

1.1 Vision Zero

One of the ten goals for achieving a competitive and resource efficient transport system is: *"By 2050, move close to zero fatalities in road transport. In line with this goal, the EU aims at halving road casualties by 2020."* (EC Communication 2011:10)

Including a 'Vision Zero' for road safety is a new and potentially ground-breaking visionary goal for 2050, complementing the "Road Safety Policy Orientations 2011-2020" target of halving road deaths by 2020. ETSC welcomes the White Paper's renewed commitment for an EU target to reduce road deaths by 50% by 2020. Targets motivate stakeholders to act and help those responsible for the road transport system to be accountable for achieving defined results. A shared target at European level helps each Member State to see that its road safety improvements are contributing to addressing a Europe-wide problem.

Alongside this ETSC also urges the Commission to accelerate its work on a common definition of serious road injuries and adopt a target for reducing these. For every road death in the EU, at least 44 road injuries are recorded, eight of which are classified as serious. The White Paper's Working Document reiterates the priority set on road injuries and first aid, targeted actions for specific categories of road users while at the same time addressing new societal challenges ahead in the European Commission's "Policy Orientations".

1.2 "To be the best in the world"

"Make sure that the EU is a world leader in safety and security of transport in all modes of transport."

(EC Communication 2011:10)

Every year 1.2 million people are killed and 20 to 50 million injured in road collisions around the world. In the WHO European Region alone, 120,000 people are killed and 2.4 million injured in road collisions each year¹. The European Region is home to three countries with the safest roads in the world (Sweden, UK and the Netherlands). The EU has one of the best records on road safety. With this comes a responsibility to take a leadership role. ETSC welcomes that the ambition to achieve this is included in the White Paper.

¹ WHO (2008); European Status Report.

1.3 Integration of road safety into different transport policy areas

Within the European Commission's new Transport White Paper fields miss out including important road safety impacts of some actions and transport policy fields. For example under action such as Urban Transport and logistics the road safety implications of promoting public transport or walking and cycling should be mentioned. Other examples include measures to promote increased replacement of inefficient and polluting vehicles under "innovation and deployment" and joint public procurement under "urban mobility": the EU should also include the safety criteria. More should be done to integrate road safety into other transport policy areas.

Integration with other policy areas was part the "Road Safety Policy Orientations 2011-2020" and, in its Blueprint², ETSC suggested that the EU could adopt a strategy to achieve a stringent integration of road safety in all policies that have an impact on road users' risk levels including, for example, employment, enterprise, environment and youth policy.

1.4 Cost of a Life

The White Paper's look to the future recognises that the transport system is not sustainable and one of its reference scenarios looking 40 years ahead says that transport cannot develop along the same path (EC Communication 2011:4). It recognises that the social costs of accidents will rise. The increase in traffic would lead to an external cost of accidents of 60 bn € higher by 2050³. The external cost of accidents associated with urban transport would increase by some 40%⁴. These calculations must be factored into future transport planning.

1.5 "Road Safety Policy Orientations 2011-2020"

The White Paper Communication includes the main assessments and cornerstones of the recent "Road Safety Policy Orientations 2011-2020" published in July 2010. ETSC presented its response to the European Commission last autumn⁵ and applauded the new 2020 goal as ambitious, but regretted the decision of the European Commission to adopt "Policy Orientations" with a weak set of objectives and actions instead of a new far reaching European Road Safety Action Programme.

The White Paper reiterates the "Policy Orientations" and looks at the progress in the past decade to reduce road deaths. It recognises that, "even though the number of road fatalities in the EU was almost halved in the past decade, 34,500 people were killed on EU roads in 2009".

² ETSC (2008), Blueprint for the EU 4th RSAP, Road Safety as a Right and Responsibility for all.

³ The costs are expressed in year 2005-€.

⁴ "Reference Scenario (2010-2050)" of the Impact Assessment on the White Paper on Transport.

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SEC:2011:0358:FIN:EN:PDF>

⁵http://www.etsc.eu/documents/ETSC%20Response%20to%20EC%20Communication_%2022%20Sept%202010.pdf

ETSC supports the view that there is a great deal that must still be done in the next decade in the field of EU legislation to improve road safety. The measures under the heading of 'Towards a 'zero-vision' on road safety' are included in the European Commission's List of Initiatives and represent the main road safety priorities for the next decade within the White Paper:

- *Harmonise and deploy road safety technology – such as driver assistance systems, (smart) speed limiters, seat-belt reminders, eCall, cooperative systems and vehicle-infrastructure interfaces – as well as improved road worthiness tests including for alternative propulsion systems.*
- *Develop a comprehensive strategy of action on road injuries and emergency services, including common definitions and standard classifications of injuries and fatalities, in view of adopting an injuries reduction target.*
- *Focus on training and education of all users; promote the use of safety equipment (seatbelts, protective clothes, anti-tampering)*
- *Pay particular attention to vulnerable users such as pedestrians, cyclists and motorcyclists, including through safer infrastructure and vehicle technologies⁶.*

1.6 Future Challenges for Road Safety

The European Commission recognises what it calls “emerging challenges and concerns” under the chapter on road safety. The Commission has also included some points that ETSC had asked to be considered for future inclusion⁷ following the earlier publication of the European Commission's “Road Safety Policy Orientations 2011-2020”. Among them are action on ageing, driving under the influence of illegal drugs and medicine. The use of illegal or psychoactive substances and medicines whilst driving is a cause for concern as is driving whilst using the mobile phone which also has been proven to significantly impair driving ability. Training and education of novice drivers as a high risk group should also be a particular priority.

Recommendations

- Develop a drugs and driving code of practice for health professionals
- Support the development of enforcement techniques for assessing driving whilst under the influence of illegal drugs and medicines
- Consider adopting EU legislation banning mobile phone (handheld and hands free) use during driving.

1.7 Funds for Road Safety

A further topic which is high on the agenda at present and is included in the White Paper is the “potential decline in public resources devoted to the maintenance of road infrastructure”. ETSC would widen this to a worrying decline in resources to taking road

⁶ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2011:0144:FIN:EN:PDF>

⁷ http://www.etsc.eu/documents/ETSC%20Response%20to%20EC%20Communication_%2022%20Sept%202010.pdf

safety measures in general and would strongly recommend budget being allocated to the improvement of road safety through the application of known, effective, science based countermeasures targeting the most life saving actions at a European and national level⁸.

ETSC Recommendations

- Through its different EU funds implement the “Policy Orientations” measures that are known, effective and science based.
- Focus funding of road safety in regions with lower levels of road safety in order to raise the common road safety level in the EU.
- Further support the EU’s twinning programme with enables best practice exchange with New Member States and neighbourhood countries.

1.8 Cross Border Enforcement

The road safety section also reiterates the strong support of the European Commission to the elaboration of a Directive on the cross border enforcement of traffic law. ETSC is pleased to see the renewed engagement on the Cross Border Enforcement Directive placed back on the agenda and looks forward to a swift workable agreement with benefit for road safety.

ETSC Recommendation

- Support the swift adoption of a strong Directive on Cross Border Enforcement of Traffic Law.

1.9 Reducing Older People’s Deaths on the Roads

For elderly people, the European Commission identified several measures such as ensuring fitness to drive, conceiving appropriate infrastructure design and signaling, and providing adequate passive safety devices. It recognises that “an aged society will demand transport services that are safe, secure, comfortable and user-friendly”. This priority is much welcomed by ETSC which reported⁹ that, while older people account for one sixth of the European population, every fifth person killed in road traffic is aged 65 or over. Moreover, due to population ageing, older people will represent an increasing share of the total population. This could have a negative impact on road safety development in the future. If the risk rates of older people and others decline at the same pace, by 2050 one death out of three is likely to be an elderly person. Providing safe mobility to senior citizens deserves special attention and requires a re-think of policies and strategies.

ETSC Recommendations

- Support and fund projects enabling life-long mobility.

⁸http://www.etsc.eu/documents/Funds%20for%20Road%20Safety_ETSC%20Paper%20November%202009.pdf

⁹ ETSC (2008), 2nd PIN Report, Chapter 4, http://www.etsc.eu/documents/copy_of_copy_of_2nd%20PIN%20Annual%20Report%202008.pdf

- Involve elderly people in developing policy.
- Stimulate the design of the road environment and development of safer vehicles to fit the abilities of the elderly.

1.10 Safety of Powered Two Wheelers

ETSC welcomes the White Paper's initiative of: "encouraging research and technical developments aimed at increasing the safety of Powered Two-Wheelers (PTWs)" and at reducing the consequences of their involvement in collisions. A holistic and comprehensive approach should be adopted in order to reduce the safety disadvantages of PTWs, a group of road users particularly at risk on EU roads. ETSC already strongly supports the Commission proposal for a Regulation (2010) to mandate Automatic Headlights On (AHO) and Advanced Braking Systems such as Antilock Braking Systems and/or Combined Braking Systems on PTWs.

A number of safety features have a great potential to enhance safety and the opportunity to mandate them in future revisions of type approval legislation should be carefully assessed. The opportunity to benefit from the eCall initiative, Intelligent Speed Adaptation (ISA) for PTWs, autonomous emergency braking are all features with high-potential that need to be further investigated.

Intelligent Transport Systems have the potential to significantly improve road safety of all road users including PTWs. However, some ITS applications such as ISA will need specific development and adaptation to enable them to be used on PTWs, due to their intrinsic characteristics¹⁰. It is recommended that further research in this area is undertaken in order to develop a safe and effective ISA system also for PTWs.

ETSC is supporting the Commission approach of perpetuating on-going efforts in order to better adapt road infrastructure to PTWs (e.g. safer guardrails) and the promotion of riders' education on the need and advantages of using personal protective equipment and advanced braking systems.

ETSC stresses that, in order to reduce the numbers of deaths and injuries concerning PTWs, these three priorities should be set:

- 1) Providing the riders with machines equipped with the safest reasonably affordable technologies;
- 2) Designing more rider-friendly road infrastructures;
- 3) Improving rider and driver education and training.

¹⁰ For reasons of vehicle stability and handling, it is inadvisable to apply deceleration inappropriately to a PTW. Therefore an ISA system for PTWs may be able to restrict acceleration, but will only be able to use deceleration in a way that causes no sudden change in engine power. In addition, there are more severe space and weight issues on PTWs than on cars, so that miniaturisation of the ISA system is a prerequisite. http://www.etsc.eu/documents/ETSC_Vulnerable_riders.pdf

1.11 Walking and Cycling

The White Paper recognises that: *‘in urban areas, walking and cycling, together with public transport, often provide better alternatives not only in terms of emissions, but also of speed’¹¹: they could readily substitute the large share of trips which cover less than 5km.”* Also that *“in addition to lowering greenhouse gas emissions, they bring major benefits in terms of better health, lower air pollution and noise emissions, less need for road space and lower energy use”*. They stress that *“accordingly, facilitating walking and cycling should become an integral part of urban mobility and infrastructure design”*.

Overall ETSC is disappointed that so little is proposed to protect pedestrians and cyclists. Deaths among pedestrians and cyclists decreased by 34% between 2001 and 2009, compared with 39% for car drivers¹². The risk of being killed in traffic per kilometre travelled is more than 9 times higher for pedestrians than for car occupants and more than 7 times higher for cyclists than for car occupants (ETSC, 2003). The severity of injuries suffered by vulnerable road users is also higher than for car occupants. Non-motorised means of transport, such as cycling and walking, account for only a small share of distance travelled by road. But they account for much larger proportions of journeys made and time spent using the roads.

It is often claimed that cycling or walking should not be encouraged as they are less safe transport modes than cars. But research rejects this argument because the advantages of walking and cycling for public health (a healthy life through regular exercise) outweigh their disadvantages (the risk of death or injury). Increasing numbers of pedestrians and cyclists can result in ‘safety in numbers’ reducing overall risk as well as risk for individuals. Walking and cycling should be encouraged as travel modes for citizens across the EU, and safety of walking and cycling should be one of the objectives of safety management.

The White Paper also refers to other measures of relevance to reducing deaths amongst the VRU target group including the harmonisation and deployment of road safety technologies: eCall, cooperative systems and vehicle-infrastructure interfaces and looks to examine the possibility of extending pedestrian recognition systems to existing fleet. ETSC supports the development and utilisation of technologies to facilitate and protect vulnerable users.

ETSC Recommendations

¹¹ The recent feasibility study for a central London cycle hire scheme considered that cycling is time competitive with all other modes over distances up to 8km. <http://www.tfl.gov.uk/assets/downloads/businessandpartners/cycle-hire-scheme-feasibility-full-reportnov2008.pdf>. A web based quantitative study amongst both cyclists and non cyclists undertaken in 2006 also found that speed is perceived to be one of the main positive ‘drivers’ of cycling to work in Central London. Source: TfL, 2008, Cycling in London.

¹² ETSC (2011) PIN Flash 19 Unprotected Road Users – a Key Concern of Road Safety http://www.etsc.eu/documents/ETSC_PINFlash19_unprotected_road_users.pdf

- Draft guidelines for promoting best practice in traffic calming measures, based upon physical measures such as roundabouts, road narrowing, chicanes, road humps and techniques of space-sharing. These measures should be introduced as an integral part of setting up speed limit zones of 30km/h in residential areas.
- Regularly monitor developments in passive and active safety technologies for the protection of unprotected road users and adopt legislation when necessary.
- Support the introduction of Intelligent Speed Assistance (ISA) which in restricting speed has the potential to reduce risks to pedestrians and cyclists.
- Support the development of car windshield airbags as a viable safety measure to improve the protection of pedestrians and other vulnerable users struck by cars.
- Introduce minimum requirements for cycle lighting and reflective elements.
- Support the assessment of the safety impact of new traffic codes, e.g. allowing contra-flow cycling on one-way streets.¹³

Part 2 Measures having an Impact on Road Safety

2.1 Work Related Road Safety

Part 2 analyses the different measures presented that will also have an impact on road safety starting with work related road safety. Of those who lose their lives on Europe's roads ever year, a large percentage is driving for work or to work whilst commuting¹⁴. Improving work related road safety would improve road safety as a whole and ETSC welcomes the number of measures included in the White Paper which will address this.

2.1.1 Road Freight and the Social Rules: Sleepiness

A major risk factor affecting driving for work is sleepiness. Working in this sector is not characterised by the typical "9 to 5" working hours. Thus ETSC welcomes the intentions of the European Commission to review the degree of convergence on safety legislation including its transposition and enforcement. Research shows that driver sleepiness is a significant factor in approximately 20% of commercial road transport crashes. Surveys show that over 50% of long haul drivers have fallen asleep at the wheel. Increased crash risk occurs at night (peak levels at night can be 10 times daytime levels), the longer the working day and with irregular hours. Those sleepiness factors that have been shown to influence road safety need to be better controlled in regulation policy and risk management. In its White Paper the European Commission also intends to "*review the rules on the tachograph to make it more cost-effective, give access to the EU register on road transport undertakings to police and enforcement officers when they carry out roadside check and harmonise sanctions for infringement to EU rules on professional transport and the training of enforcement officers*" (EC Communication List of Initiatives 2011:19). ETSC welcomes, the recognition that one of the most important factors in

¹³ ETSC (2011) PIN Flash 19 Unprotected Road Users – a Key Concern of Road Safety

¹⁴ http://www.etsc.eu/documents/Reducing%20Road%20Safety%20Risk%20Driving%20for%20Work%20and%20To%20Work%20in%20the%20EU%20-%20An%20Overview_Final%202010.doc.pdf

tackling sleepiness that will ensure safety is to effectively implement and enforce regulation¹⁵.

ETSC would also welcome the development of “*A social code for mobile road transport workers*” included in the White Paper. This should: “*specifically contribute to the wider policy objective of sustainable transport in terms of road safety*”. The idea is that the European Commission suggests that such a social code: “*should be specifically addressed to mobile workers and employers to make them liable or co-liable – as appropriate – for compliance with common minimum working standards. It should cover such issues as: terms and conditions of employment, health insurance and care, a better organisation of work and resting periods of drivers to enable the reconciliation of their work and family life, as well as gender equality*”.

In its recent report on “*Fitness to Drive*”¹⁶ ETSC stresses that Workplace health promotion (WHP) is of paramount importance, but that it is also a real challenge for employers. Employers are very likely to find that a large number of driver related risk factors are related to health: stress, sleepiness, distraction, ageing staff, unhealthy diet, consumption of alcohol illegal drugs or prescription medicine, pre-existing diseases, smoking, lack of exercise, etc. When it comes to professional drivers, a number of sector-related health conditions are also frequent: lower back pain, overweight, cardiovascular and respiratory disease, and work-related stress (EU OSHA, 2009). Beyond duty of care and legal obligations, a successful organisation will benefit in a number of ways from WHP. Research shows investment in WHP yields a return on investment of one to 2.5 – 4.8 in reduced absenteeism costs (Bödeker and Kreis, 2004). Workplace health promotion should be included in the “social code” to increase road safety amongst professional drivers.

ETSC Recommendations

- Include WHP in the elaboration of a “social code for mobile transport workers”.
- Remind employers that employees’ ill-health should be considered as part of their risk assessment under Directive 89/391, and promote WHP as the most efficient tool to combat ill-health.
- Promote the Business Case for WHP to employers.
- Target professional drivers with measures to combat sleepiness. This can be achieved through information, education and training about the dangers of driving when tired.
- Ensure there are consistent levels of enforcement of working time across the EU with penalties designed to strongly influence behaviour towards compliance.

2.1.2 Maximum Weights and Dimensions of Road Vehicles

The maximum size and weight of road vehicles are governed by Directive 96/53/EC. The European Commission states its intention to have a “fresh look” at this legislation and

¹⁵ ETSC, (2001), *The Role of Driver Fatigue in Commercial Road Transport Crashes*
<http://www.etsc.eu/documents/drivfatigue.pdf>

¹⁶ <http://www.etsc.eu/documents/PRAISE%20Report%203.pdf>

considers to adapt it to new circumstances, technologies and needs (e.g. weight of batteries, better aerodynamic performance), and to make sure it facilitates intermodal transport and the reduction of overall energy consumption and emissions. It also mentions that further independent work is currently being undertaken by the Commission to assess the issue and determine conditions for progress. ETSC has recently completed its own position¹⁷ on the dossier and concludes that it has serious concerns about the impact of LHVs on transport safety in general, and road safety in particular. Depending on the operational conditions, several safety aspects would need to be addressed bringing with them high societal costs to maintain the current level of risk in road traffic of these vehicles and of other road traffic participants. The renewed 50% EU reduction target for road deaths requires a substantial increase of current efforts in order to be achievable by 2020. The likelihood of an increase in the number of collisions and their severity posed by LHVs is a serious concern that could slow down progress during the next decade and it therefore clashes with current policy expectations. Investments that would need to be made in adapting the road infrastructure are likely to decrease budget available for addressing other safety aspects for all road users.

2.1.3 Journey Planning and Innovative Mobility Patterns

ETSC would much welcome EU action to influence journey planning and argues that this also can have an effect on road safety. In the White Paper, the European Commission recognises that: *“the availability of information over travelling time and routing alternatives is equally relevant to ensure seamless door-to-door mobility, both for passengers and for freight”* (EC Communication 2011:12). Travel behaviour can be influenced by new ITS applications that mainly provide the traveller with a better basis for decisions in terms of traffic and travel information. Technologies to help with journey planning can also direct drivers along the most efficient routes. They can be linked to technologies used out of the vehicle to do with scheduling of shifts and link to managing fatigue. Some satnavs and journey planners already take into account school times to direct drivers away from schools during peak times. It is hoped this will contribute to the overall road safety and congestion both giving route information before the trip commences and on-trip.

Journey planning should focus on identifying the safest, most sustainable mode of travel as well as the safest, most efficient route. This would include the identification of and dissemination of information on safe and direct routes for pedestrians and cyclists as alternatives to short car trips.

2.1.4 Company Cars

One other issue of relevance to work related road safety is the taxation of company cars. Within the section on pricing and avoiding distortions, the European Commission argues that, at present many branches of transport are treated favourably in terms of taxation, in comparison to the rest of the economy, including the tax treatment of company cars. Company car registrations account for 50.5% of the 11.6 million passenger cars registered

¹⁷ http://www.etsc.eu/documents/ETSC_Position_on_Longer_and_Heavier_Vehicles.pdf

across 18 EU Member States in 2008 (Polk 2009)¹⁸. Generally, these arrangements provide conflicting incentives with respect to the efforts to improve the efficiency of the transport system and reduce its external costs. The Commission will “examine proposals to achieve greater consistency between the various elements of transport taxation and to encourage the rapid introduction of clean vehicles” (EC Communication 2011:14). ETSC points out that a change here would also have a positive impact on road safety.

In a recent report ETSC argues that distance rates, vehicle allocation rules and incentive schemes should aim to minimise vehicle use and any schemes that may encourage artificially high vehicle use should be revised in order to reduce unnecessary on-road exposure (Murray 2010). Cooke (2010) stresses the need to review what the employer criteria for allocating company cars are. Risk management, which has already started to rise as an important issue, will continue and be linked to strategies to cut overall business mileage.

2.2 Speed Management

Continued action to tackle excessive speeding is required as it remains the single biggest contributory factor in fatal road collisions. In this regard, ETSC is delighted the European Commission has recognised that: “reducing speed is an extremely effective way to reduce not only the risk of collisions but also fuel consumption,” particularly as this approach enjoys the support of the European public. Promoting eco-driving and in-vehicle systems that ‘provide real-time information on prevailing speed limits’ will also contribute to improving compliance with speed limits.

While the White Paper refers to the need to harmonise and deploy road safety technologies, ETSC considers that the Commission should have a stronger leadership role in promoting technologies especially Intelligent Speed Assistance Systems.

ISA is a mature technology that has substantial safety benefits and potential to reduce the consequences of most severe crashes (fatal and serious injury). Research shows that advisory ISA can achieve up to an 18% reduction in fatal accidents and intervening ISA can achieve a 37% reduction in fatal accidents in the UK.¹⁹ It is also an effective instrument in mitigating climate change. As such, ISA should be pushed forward and ETSC encourages the Commission to adopt European legislation for mandatory fitting of European cars with informative or supportive Intelligent Speed Assistance systems in the type approval for cars. This Directive should include technical requirements and an implementation timetable.

ETSC also welcomes efforts to reinforce key elements of eco-driving within the curricula of the theoretical and practical tests. This goes some way to recognising the casualty reducing benefits of managing driving speeds. However, the OECD estimates that at any one

¹⁸ However, the share of company cars in total registrations varies between countries. It is lowest in Greece (24%), highest in Germany (60%).

¹⁹ ETSC (2008) Managing Speed Towards Safe and Sustainable Road Transport

moment 50% of drivers exceed legal speed limits.²⁰ The extent of the behavioral change needed illustrates the urgency and indicates that regulatory action is the most sensible approach to tackle speed. In this regard ETSC encourages the European Commission to recommending uniform maximum speed limits. Reducing speeds across the EU by just 1 km on average could save 2,200 lives every year²¹.

ETSC Recommendations

- Adopt the Directive on cross border enforcement of traffic law as soon as possible
- Propose a maximum speed limit of 120 km/h or less for the EU TEN-T and encourage Member States to adopt a maximum 50km/h in urban areas and a maximum 30km/h in residential areas and areas with high levels of pedestrians and cyclists.
- In the short term, introduce a driver set speed limiter as a standard equipment in all new vehicles.
- Contribute to the development of harmonised standards for Intelligent Speed Assistance (ISA) systems towards eventual universal fitment.
- Adopt legislation for mandatory fitting of all fleet cars with Intelligent Speed Assistance systems.
- Develop a European standard for a "speed limit service", i.e. over the air²² provision to in-vehicle systems of current geodata on road speed limits
- Require member states to provide a standardised "speed limit service" over the air.
- Adapt the EU Directive on the promotion of clean and energy-efficient road transport vehicles to include in vehicle technologies (ISA) for safety in public procurement.
- Draft guidelines for promoting best practice in traffic calming measures
- Initiate a technical assistance programme to support less well performing Member States to develop national strategy on speed reduction. This approach might also include technical exchanges or twinning with other better performing Member States.

2.3 Urban Transport and Logistics

The White Paper also includes Urban Mobility Plans within its list of initiatives. The European Commission's list includes the aim to:

- *Establish procedures and financial support mechanisms at European level for preparing Urban Mobility Audits, as well as Urban Mobility Plans, and set up a European Urban Mobility Scoreboard based on common targets. Examine the*

²⁰ OECD/ECMT (2006).

²¹ ETSC (2010), 4th Road Safety PIN Report, Road Safety Target in Sight - Making up for lost time.

²² "Over the air": the idea is that a car would receive updates on speed limits by wireless broadcast, e.g. over a mobile phone network. This would be able to handle permanent changes in speed limits and also temporary changes such as for construction zone. It deals with the problem of speed limit information going out of date.

possibility of a mandatory approach for cities of a certain size, according to national standards based on EU guidelines.

- *Link regional development and cohesion funds to cities and regions that have submitted a current, and independently validated Urban Mobility Performance and Sustainability Audit certificate.*

(EC Communication List of Initiatives 2011:26).

Transport safety should be considered as an essential component of sustainable mobility and mobility planning. In attempting to secure change in urban mobility patterns, road safety can be regarded as a critical challenge, largely because of the social and economic cost of road collisions. As such, safety should be tackled at all levels of mobility planning. Real and perceived safety can have a profound effect on modal choice especially in terms of the most sustainable modes of travel - walking and cycling and ability to access public transport. Safety should be integrated not only into the development of Urban Mobility Plans but also into proposed Urban Mobility Audits and Guidelines and be reflected in common targets.

Plans should adopt a clear hierarchy of transport users, with pedestrians, cyclists and public transport users at the top of the hierarchy. As a general principle, these users should have their safety and convenience needs considered first. It is most important that the hierarchy is applied where a large share of travel is (or could be) made by walking, cycling and public transport.

A higher share of travel by collective transport, combined with minimum service obligations, will allow increasing the density and frequency of service, thereby generating a virtuous circle for public transport modes. The Commission should also add another benefit: the core public transport modes (bus and rail) are the safest modes of transport. Trips by public transport, including walking or cycling to and from access points are collectively safer than car trips (ETSC 2003). This is another reason why the EU should promote the extension, quality and use of public transport and that conversely more dangerous modes should be discouraged. The Working Document also recognises that the safety of public transport will be essential to the greater uptake of public transport (EC Working Document 2011:25). The provision of travel information and travel planning should include a consideration of safety in promoting alternatives in terms of both mode choice and route choice.

ETSC Recommendations

- Recognise the benefit that the core public transport modes (bus and rail) are the safest modes of transport.
- Recognise that the provision of travel information and travel planning includes a consideration of safety in promoting alternatives of mode and route choice.
- Include Road Safety targets in the European Urban Mobility Scoreboard based on common targets.

2.4 Land Use Planning

The White Paper stresses that "*Demand management and land-use planning can lower traffic volumes. Facilitating walking and cycling should become an integral part of urban mobility and infrastructure design.*" The White Paper signals a change of approach to dealing transport issues – from the traditional single pronged approach of building more and more transport infrastructure to a more multi-faceted approach that also seeks to manage travel demand and make better and more efficient use of existing resources and new technologies. ETSC supports this approach which can also offer benefits in terms of transport safety.

Travel demand management measures are aimed at reducing the growth in travel and encouraging a transfer of trips from the car to more sustainable modes of travel. The impact on safety should be a central consideration in the development of demand management measure which can also contribute to achieving road safety targets.

Transport is a demand derived from the location of homes, jobs, education, shopping and other land uses. As such, transport infrastructure and services cannot be supplied or transport demand managed in isolation from land use planning.

Integrated land use and transport planning should be made a key tool in managing the demand for travel and transport and in influencing transport safety and mobility patterns across the EU. Urban design affects travel patterns. Today the aim is to ensure that walking and cycling are the dominant modes for shorter trips, and that public transport becomes the dominant mode for longer trips. To deliver integrated land use and transport planning there is a need at the national level for greater collaboration between the Transport and Planning Ministries and other ministries that influence transport, such as Finance, Education, Environment and Industry. Without high-level coordination, the delivery of integrated transport and land use planning will rest in the hands of pioneering authorities rather than being a common deliverable across Europe (EEA 2008).

ETSC Recommendation

- The EU should encourage the integration of road safety into land use and transport planning.

2.5 ITS: Promote the use of modern technology to increase road safety

ETSC supports the European Commission's assessment that technology can contribute a great deal to the improvement of the safety record of road transport²³ as included in the European Commissions "*Policy Orientations on Road Safety*". This area has seen a recent boost for new action with the advent of the negotiation and adoption of the ITS Directive 2010 and the launch of the implementation plan for the ITS Action Plan adopted in 2008. ITS can contribute to road safety both in reducing crash risk and alleviating the severity of crash consequences. Casualty reductions vary greatly depending on the technologies. The

²³<http://www.etsc.eu/documents/ETSC%20Response%20to%20EC%20Communication%2022%20Sept%202010.pdf>

European Commission's White Paper states that the *"wider deployment of Intelligent Transport Systems that can detect incidents, support traffic supervision, and provide information to road users in real time will considerably improve traffic safety"*.

It is important to accelerate the deployment of advanced in-vehicle driver assistance systems and safety related ITS systems. The ITS ADAS (Advanced Driving Assistance Systems) applications highlighted by the Policy Orientations and the White Paper include Lane Departure Warning and Anti Collision Warning or Pedestrian Recognition Systems. Whilst important life saving devices, these are not the ones that should have the highest priority. Within the context of implementing the ITS Directive and Action Plan ETSC argues that specific reference should be made to the three most important ADAS: ISA, Alcohol Interlocks and Seat Belt Reminders on all seats. They should be included in the set of mature road ITS applications for deployment for which specifications are being designed from the ITS Directive and are being prepared for 2014. Finally, ETSC welcomes that the European Commission's White Paper repeats its commitment to eCall.

ETSC Recommendations

- Promote the implementation of non-industry driven and research based in-vehicle safety systems.
- Speed up preparations to include eCall in vehicle type approval.
- Consider extending eCall to other vehicle types such as PTWs.
- Ensure that eCall works in all 27 EU countries and in new cars of all brands and countries of origin by 2014.
- Create a major and dedicated RDI initiative for Safer Car (on the model of the Green Car Initiative)
- Support the deployment of the most life-saving safety technologies and create a market for safety.

2.6 Public Procurement

The European Commission has identified that *"public procurement strategies can contribute to ensuring for the rapid up take of new technologies within the context of the regulatory framework for innovative transport."* The European Commission can play an important role by including specific requirements on minimum safety levels in their vehicle purchase and leasing policies within the review of the public procurement legislation. In doing so, public authorities and companies contribute to the market penetration of safer cars by supporting the demand for such vehicles and for safety technologies, which hopefully in turn help lowering the price of safety technologies²⁴.

2.7 Pricing and Taxation

If transport charges and taxes are to be restructured, they should also include road traffic accident costs. Collision costs should form an intrinsic part of the external costs.

²⁴ <http://www.etsc.eu/documents/PRAISE%20Report%201.pdf>

ETSC Recommendations

- Include collision costs in the calculation of a mandatory infrastructure charge for heavy-duty vehicles.
- Include criteria concerning the safety performance of vehicles when reassessing vehicle taxation to favour the deployment of clean and safe vehicles.

2.8 Infrastructure and the TEN-T Road

On the TEN-T, motorways, rural roads and urban road networks, all EU Member States should be working towards the same high levels of infrastructure safety. The European Commission's White Paper recognises that new investments in the TEN-T will also need to reflect EU legislation on road safety infrastructure. The implementation of the new Directive on infrastructure safety has the potential of saving 600 lives and avoiding 7,000 serious injuries every year across the EU on the TEN-T network (European Commission, 2005). ETSC expects a real benefit to be delivered in terms of saving lives with the implementation of this Directive. Within the "Policy Orientations on Road Safety 2011-2020" the European Commission proposed that European funds would only be granted to infrastructure compliant with the road safety and tunnel safety Directives. This action is also very much supported by ETSC and should be highlighted within the debate of the new White Paper and upcoming revision of the TEN-T guidance. Every year between 1.5 and 2 billion EUR of EU funds are spent on building roads in the EU, it is the EU's duty to ensure that these roads are built safely.

2.9 External Dimension: Road Safety

The White Paper states that *"transport is fundamentally international and because of this, most actions in the Road Map are linked to challenges related to the development of transport beyond the EU borders"*. ETSC would also stress that the EU has a role to include road safety in its relations with its neighbours when it comes to co-operating on transport. EU member states unanimously supported UN resolution A/64/266 on improving the global road safety crisis, which proclaims 2011-2020 as the Decade of Action for Road Safety. Globally, each year nearly 1.3 million people die as a result of a road traffic collision. Ninety percent of road deaths occur in low- and middle-income countries, which claim less than half the world's registered vehicle fleet. Road traffic injuries are among the three leading causes of death for people between 5 and 44 years of age, killing more people each year than malaria²⁵. As the world's biggest aid donor, the EU should ensure that EU road safety policy objectives also apply to external programming so as to create consistency in approach and stress the importance of road safety as a priority for the EU in all relevant policy areas. At present road safety is not a policy or programmatic priority for EuropeAid or for the European Investment Bank, despite the overwhelming support of EU Member States for UN resolution A/64/266 on improving the global road safety crisis.

²⁵ WHO Global Plan for the Decade of Action for Road Safety 2011-2020
http://www.who.int/roadsafety/decade_of_action/plan/english.pdf

The European Commission and Member States are the biggest donors of development aid in the world, thus they should also make a concerted effort especially within the context of the UN Decade of Action to support road safety projects and measures in the low- and middle-income countries.

ETSC Recommendation

- Commit to condition infrastructure funding to minimum safety requirements, with a particular concern for the protection of vulnerable road users.

For more information

ETSC (2003), Towards Reduced Road Risk in a Larger Europe: Response to the 3rd RSAP

ETSC (2005), Intelligent Speed Assistance – Myths and Reality

ETSC (2005), Safety of Vulnerable Road Users

ETSC (2007), 1st Road Safety PIN Report, Raising compliance with Road Safety Law

ETSC (2008), Managing Speed Towards Safe and Sustainable Road Transport

ETSC (2008), A Blueprint for the EU's 4th Road Safety Action Programme 2010-2020

ETSC (2008), 2nd Road Safety PIN Report, Countdown to 2010

ETSC (2009), 3rd Road Safety PIN Report, 2010 on the Horizon

ETSC (2010), Position on Cross Border Enforcement Directive

ETSC (2010), Position on L-category vehicles

ETSC (2010), Reducing Road Risk Whilst Driving for Work

ETSC (2010), 4th Road Safety PIN Report, Road Safety Target in Sight - Making up for lost time.

ETSC (2011), PIN Flash 19 Unprotected Road Users – a Key Concern of Road Safety

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The European Transport Safety Council (ETSC) is a Brussels-based independent non-profit making organisation dedicated to reducing the numbers of deaths and injuries in transport in Europe. The ETSC seeks to identify and promote research-based measures with a high safety potential. It brings together 45 national and international organisations concerned with road safety from across Europe.