VOICE Network response to the Commission's position on the CARS 21 High Level Group Final Report COM(2007)22

The VOICE Network, representing a diverse range of groups concerned with the needs of vulnerable road users, is disappointed with the Commission's response to the CARS21 High Level Group Final Report (COM(2007)22). We were not expecting the European Commission simply to adopt the recommendations of this report but rather to take into account the responses sent by the different stakeholders, including non-industry representatives such as ourselves, during the public consultation. The latest Communication indicates that this has not been the case.

As the Commission reinforces its commitment to increasing European competitiveness, it is very important that it makes a real effort towards improving road safety in the continent. European leadership is necessary in order to ensure that concrete action to protect vulnerable road users is taken in the next two years.

The VOICE Network would therefore like to reiterate some specific concerns in the area of safety of vulnerable road users, related to the points in section 3.4:

• The Commission's further delay in proposing concrete amendments of phase II of the Pedestrian Protection Directive is disappointing. A regulation replacing Directive 2003/102/EU on the protection of vulnerable road users is long overdue and should be adopted as soon as possible. This regulation should ensure a rapid implementation period, a bonnet leading edge to the upper leg standard and a clarification of the additional benefits derived from active safety systems.

• Speed and alcohol are major causes of road accidents. Speed management via Intelligent Speed Adaptation (ISA) technologies and alcohol interlocks should therefore be included in the Commission's road safety policies so as to increase safety for all road users.























• The Commission proposes to "encourage and support the conditioning of Community financing in the road sector to projects which follow best practice in road safety". Special

Attention should be devoted to best practice guidelines and recommendations for infrastructure decreasing the risks to vulnerable road users and related Commission recommendations elaborated.

• The Commission should not undermine the delegation of powers and authorities it confers on EU institutions by passing on regulatory powers to the UN. The UNECE process excludes European parliamentary inspection and amendment. For reasons of democratic scrutiny as well as compliance with the Commission's role of "guardian of the Treaty", any UNECE action should only be promoted following the completion of the EU process.

It is never too late to include the voice of vulnerable road users in European road safety policy.

The Members of the VOICE Network are:

AGE – European Older People's Forum. ANEC – European Consumer Voice in Standardisation. BEUC – European Consumers' Organisation. ECSA - European Child Safety Alliance. EDF - European Disability Forum. EPHA – European Public Health Alliance. HEAL – Health and Environment Alliance. ETSC -European Transport Safety Council. T&E - The European Federation for Transport and Environment. Voetgangersbeweging (Pedestrian Movement) / IFP - International Federation of Pedestrians.