

## **EC's consultation on the Communication on a Sustainable Future for Transport**

### ***Contribution of the European Transport Safety Council (ETSC)***

#### **A. General remarks**

The European Transport Safety Council (ETSC)<sup>1</sup> welcomes the European Commission's consultation on the Communication on a Sustainable Future for Transport.

ETSC believes that the primary role of EU transport systems is not only in satisfying the immediate needs of society, but rather in contributing to achieving EU aims and policy goals (e.g. Article 3 of the Treaty highlights issues such as social progress, improvement of the quality of the environment, social cohesion and exclusion, besides well-being<sup>2</sup>). Transport policies should also contribute to the application of common values of EU citizens. Thus in designing future transport systems, a more proactive role for transport should be assumed. This requires a broader transversal view and a complex policy approach.

ETSC congratulates the Commission's services for succeeding to identify the main drivers and key policy issues for transport policies in the long term. It agrees that a citizen should be at the centre of attention and be the measure of success or failure of any future policy intervention. This includes health and societal considerations which are often in opposition to economic criteria. Economics tends to prevail amongst all aspects considered when planning for future transport systems in Europe.

In ETSC's view, all transport systems should be designed and function in such a way that no harm is done to their users and that sustainability is assured in the long term. We propose that many of the philosophical concepts underlying Vision Zero should be adopted in the EU transport strategy. The EU has all the predispositions for becoming the global leader on road safety and it should not miss this chance.

Setting numerical maxima for the number of fatally and seriously injured has proved to be a highly efficient tool for improving road safety and should be also used for the future EU strategy. It will allow for better coordination and political accountability. ETSC judges the proposed goal of no more than 5,000 road deaths per year by 2050 as very helpful, but not challenging enough. It would require a uniform year-to-year reduction of only 5% that is just little above the average annual reduction reached over the period 2001-2008 in the EU-

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<sup>1</sup> The European Transport Safety Council (ETSC), founded in 1993, is a Brussels-based independent non-profit making organisation dedicated to the reduction of the number and severity of transport casualties in Europe. The ETSC seeks to identify and promote research-based measures with a high safety potential. It brings together 42 national and international organisations concerned with road safety from across Europe. ([www.etsc.eu](http://www.etsc.eu))

<sup>2</sup> Well-being as well as social progress should be understood from a broader perspective - see Stiglitz's report at <http://www.stiglitz-sen-fitoussi.fr/>

27 countries. Such a rate of reduction could be considered challenging enough if applied to a combined target where fatally and seriously injured are taken together.

Road transport generates some 97% of all transport deaths, which is disproportionately high compared to other modes, even when considering their respective contributions to the movement of people and goods. The primary function of road transport is in providing all-over access and it cannot guarantee fastest and most reliable service to its users. This should be reflected in the overall transport strategy focusing on safety dimension.

Transport indeed uses scarce resources that should be preserved for future generations. Thus any global strategy should seek the ways to contribute to a rational use of transport. The rationality in use of resources could be indeed a motto for the future strategy.

ETSC maintains that it is of vital importance that the European Commission defines clearly the goals and objectives of its Transport Strategy using the background of values and principles referred to in the Treaty. By doing so, it will attribute transport a more active role in all EU policies. At the same time, it should assure that all policy decisions taken in other areas contribute to maintaining these objectives.

## **B. Views on specific issues (as outlined in the consultation document)**

### **1. Infrastructure**

ETSC would welcome stricter criteria for the allocation of EU funds to financing infrastructure projects. The projects serving EU goals and values should be prioritised and serve EU values through their life. The investments should not be driven by perceived needs, but rather serve long-term goals. The projects having broader societal benefits should always be prioritised. Transport infrastructure could be used as a tool to shape user behaviour in respect to a rational use of the transport system.

The use of the four instruments included in the Infrastructure Safety Directive<sup>3</sup> should be promoted and extended to all road networks and road types. Road infrastructure should provide a safe space for all users, which could mean a physical separation of traffic flows in two directions, or different kinds of road use. Under the Vision Zero, the concept of self-explaining roads and forgiving roadsides should be promoted and their broad application be assured.

Reflecting externalities of transport in pricing systems for the usage of infrastructure could indeed be an important tool for achieving a balanced use of road infrastructure.

The use of EU regional and development funds to improve road safety in individual Member States and regions with poor road safety records should be encouraged.

### **2. Funding and pricing**

According to national estimations, road crashes cost the EU countries some 2-3% of their GDP<sup>4</sup>.

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<sup>3</sup> EC, Directive 2008/96/EC

<sup>4</sup> EC (2007). Social and economic consequences of road traffic injury in Europe, ETSC, Brussels

If the EC considers the internalisation of external accident costs, the ETSC calls for a clear definition of accident costs so that the need for internalisation can be assessed. Should the assessment come to the conclusion that there is a need, then the different possible measures should be assessed in detail.

Reflecting externalities of transport in pricing systems for the usage of infrastructure could indeed be an important tool for achieving a balanced use of road infrastructure.

### 3. Technology

The European vehicle industry is currently facing a crisis. Beating off the international competition now and in the future will be a challenge but developing its safety credentials and profiling itself as the producers of the world's safest vehicles can play a crucial role. Investing in ITS technologies and further addressing the main causes of road injuries will help us to build on the EU's reputation as the home of safe vehicle innovation now and in the future at the same time as technologies to reduce fuel use and emissions and to reduce avoidable congestion are progressed. The development and deployment of new technologies in road transport should thus be at the heart of the EU transport agenda, as it could strongly contribute to achieving common objectives and at the same time to assure competitiveness of transport solutions and of the whole systems. R&D projects financed within the EU framework programmes could be a motor for improvements.

### 4. Legislative framework

ETSC promotes an evidence-based legislative framework and urges that any future legislation should be science-based and that priority should be given to those areas in which road risk could be efficiently tackled leading to a substantial reduction in road injuries and deaths.

ETSC further believes that workers at transport whose work influence safety (not only pilots, drivers, but also for e.g. maintenance engineers) should be more regulated than others through working time regulations and other provisions, independently to their status (self-employed or employed). It is indeed a right of every citizen in Europe to have their transport operated to the highest possible standard.

One third of fatal accidents at work take place in road traffic and other transport<sup>5</sup>. Any future health and safety legislation in other areas such as employment should also address road safety. Employers should address road safety of their employees, by for example drawing up road safety plans.

ETSC suggests that the Commission investigates potential benefits of harmonisation of traffic law across the EU. To ensure that all Member States achieve high standards in enforcement, the European Commission should provide legislation setting the minimum requirements on traffic law enforcement and providing for following up offences committed by the non-resident offenders.

The EU should also work towards a single penalty point system for traffic law offenders and harmonised maximum allowable levels of Blood Alcohol Content. The EU should propose a 120km/h speed limit or less for its TEN-T high speed networks and assure its enforcement through new enforcement technologies.

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<sup>5</sup> Health and Safety Executive (2009). <http://www.hse.gov.uk/statistics/european/tables.htm#table1>

EU legislation for mandatory fitting of European cars with Intelligent Speed Assistance Systems and other highly efficient safety technologies in the type approval procedure for cars should be adopted. Technical requirements and an implementation timetable should be a part of any legislation in this area.

## 5. Behaviour

ETSC believes that it is indeed essential to involve the medical community in the policy making process to reach a more rationalised and safer behaviour.

New concepts of attributed responsibility should be gradually introduced, bringing a safer behaviour of transport users.

Technologies assuring fitness to drive should be supported and gradually introduced as an integrated part of all vehicles. Similarly, technologies addressing specific needs of older people should be addressed by research and implemented by carmakers, as by 2050, one road traffic death in three is likely to be an elderly person<sup>6</sup>.

## 6. Coordinated action

The EU has an important role to play in encouraging action at the national level. In the area of transport safety, it should press for the adoption of national targets and road safety action plans to improve road safety performance.

At the EU level, one single EU Transport Safety Agency should be established, coordinating actions and providing expertise not only to EU institutions, but also to Member States, where similar agencies could assist in coordinating efforts carried out at local level. Its role should also include the labelling of unsafe roads and vehicles, identifying unsafe behaviour, and communicating the results to EU road users. It should also act as a centre of excellence in the area of research. Moreover, it should work to propose new areas of legislation for improving transport safety.

Each fatal air or rail crash or fatal maritime or inland waterway incident, and a rigorously representative sample of fatal road collisions occurring in Europe should be investigated by an independent body in the future. The findings should be used in a Europe-wide database serving and accessible to industry, public authorities, non-governmental organisations and the interested public. This effort could also be coordinated by an EU Transport Safety Agency.

A principle of attributed responsibility should be promoted amongst EU Member States, allowing countries and regions bringing a sound contribution to common goals to be rewarded. A shared-responsibility concept has shown its limitations in pursuing higher accountability.

More competencies at the local level in the area of transport system planning and provision could result in more efficient and user-oriented transport solutions for citizens. 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. Without high-level coordination, the delivery of integrated transport and land use planning

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<sup>6</sup> ETSC (2008). Countdown to 2010, 2<sup>nd</sup> PIN annual report, ETSC, Brussels, 2008

will be confined to pioneering authorities rather than being a shared experience of citizens and communities throughout Europe<sup>7</sup>.

## 7. External dimension

Upgrading and adding transport links to the EU's neighbouring countries should be viewed as a policy priority as underlined in the Article 8 of the Treaty. But the safety and security dimension should not be underestimated. New surveillance mechanisms for vehicle inspection may be needed to address roadworthiness of the vehicle fleet coming in to Europe from third countries.

The gradual development of a common market has not been sufficiently reflected in the provision of transport infrastructure for transport of goods and new links for rail freight might be needed.

The EU should assure itself that while providing any financial aid to Third Countries for infrastructure improvements, the standards relative to sustainability of transport are respected. Most notably, the application of infrastructure safety provisions should be a precondition for the attribution of any funds.

## C. Additional suggestions

The negative side effects of urbanisation may need a special attention in the future, too. A public pressure on having car-free space in the cities, noise and pollution-free environment may bring about new policy challenges and opportunities.

Effectiveness in spending public money in research could be further enhanced by improving the quality of research and ensure the application of research findings in policy making. The Commission should be continuously reviewing the projects that it has undertaken and identify those policies that would achieve significant casualty savings and pursue their implementation.

### *Consultation document referred in the text:*

[http://ec.europa.eu/transport/strategies/2009\\_future\\_of\\_transport\\_en.htm](http://ec.europa.eu/transport/strategies/2009_future_of_transport_en.htm)

[http://ec.europa.eu/transport/strategies/doc/2009\\_future\\_of\\_transport/20090727\\_guide\\_to\\_public\\_consultation.pdf](http://ec.europa.eu/transport/strategies/doc/2009_future_of_transport/20090727_guide_to_public_consultation.pdf)

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<sup>7</sup> EEA (2008). Time for a Climate Change: TERM 2007 Indicators tracking Transport and Environment in the European Union. EEA, Copenhagen