

Enhancing competitiveness by improving car safety

ETSC's response to CARS 21

The automotive industry together with the European Commission has launched a "High Level Group for a competitive automotive regulatory system for the 21st century" – so-called CARS 21. Led by three Commissioners the group seeks to "enhance global competitiveness and employment while sustaining further progress in safety". In order to achieve this objective, the group foresees passing on the European Union's regulatory powers in the area of vehicle safety to the UN.

The European Transport Safety Council (ETSC) strongly welcomes the Commission's and industry's ambition to incorporate road safety in its efforts to advance the industry in Europe so as to make better private cars available and affordable for every citizen.

However, ETSC will closely follow the recommendations to come out of CARS 21 to ensure that they do indeed sufficiently emphasise safety, including pedestrian protection. The protection of life and limb is not something to be taken lightly and frivolously balanced against protecting commercial interests. Consequently, ETSC suggests a rephrasing of the objective of CARS 21 so as to make vehicle safety a central element of any new regulatory framework. Hence, ETSC calls for enhancing the industry's global competitiveness by improving the safety of all cars.

Whilst it is important for the Commission to support advances in the economic well being of Europe, including the competitiveness of the car industry, it also has a broad range of other goals important to the citizens of Europe. A new regulatory framework for the car industry should serve all of Europe's goals, including the objectives of the Common Transport Policy and especially the target of halving road fatalities by 2010.

At a time when the EU Constitution is being scrutinised by citizens across Europe, the Commission should not undermine the delegation of powers and authorities it confers on EU institutions by passing on regulatory powers to the UN. Moreover, the UNECE process precludes European parliamentary scrutiny and amendment. So for reasons of democratic scrutiny, as well as compliance with the Commission role of "guardian of the Treaty", any UNECE action should only be promoted following the completion of the EU process.

ETSC therefore welcomes ambitions by the Commission and the automotive industry to enhance global competitiveness, but recommends that all aspects listed below are given appropriate consideration in the course of this process:

- the regulatory system should not compromise the protection of transport users with the protection of commercial interests – vehicle safety is a central pillar of the automotive industry’s global competitiveness.
- any new regulatory emphasis should not undermine important initiatives to attain a range of EU policy targets. Improving competitiveness has to comply with overarching EU transport policy objectives as well as make a contribution to achieving road safety visions and targets at EU and national level.
- a “ Competitive Automotive Regulatory System” need not necessarily compromise the stringency of regulation, as the stringency of regulation has not appeared to be a major factor in the changing competitiveness of the EU automotive sector. Indeed, the Commissions European Competitiveness Report of 2004 highlights how product quality and technological advances, including safety features such as ABS, have improved European automotive industry global competitiveness.
- global harmonization of standards should not dilute the democratic process of civil society monitoring the development of regulations. The European Parliament must therefore not be stripped of their powers to improve legislation influencing the safety of Europe’s citizens. Hence, better regulation should retain democratic scrutiny, whilst facilitating transparency and simplicity of regulations.
- The UNECE can not meet these conditions to apply EU objectives. No powers should be therefore delegated to the UNECE. This is particularly so during the period when the EU Constitution is undergoing civil review/approval across the EU. Undermining the democratic scrutiny of the EU regulatory framework outlined in the constitution will not promote favourable referenda results.