

# ETSC response to the Commission's Consultation document on the White Paper

## "European transport policy for 2010" : Time to act

### Introduction

As Europe's sole Brussels-based non-governmental organisation dedicated to improving transport safety across all Member States and across all transport user groups, the European Transport Safety Council (ETSC)<sup>1</sup> generally endorses the approach taken and the measures proposed by the Commission in the White Paper and in the 3<sup>rd</sup> Road Safety Action Programme. But ETSC calls for a more urgent and robust approach by the EU and Member States if transport safety is to be improved and if the ambitious target of halving road deaths by 2010 is to be attained. For every mode of transport, ETSC advocates a systemic approach, including measures to enhance the passive and active safety of road vehicles, trains, vessels or aircrafts, the safety of infrastructures, as well as the human performance in operating any transport system.

Road deaths in the EU account for 97% of all transport deaths. This ETSC response will therefore focus prominently on the actions that need to be taken to improve safety in the road mode. As common as crashes may seem they are not without a cause. It is the responsibility of all Europe's transport safety practitioners, such as the European Commission and ETSC, to identify such causes and implement appropriate measures making accidents less and less common.

As a matter of fact, despite some singular national achievements, the EU road safety policy is far from being a success story and the gap between the best- and the worst-performing Member States is widening. In 2004, approximately 43 700 people were killed on European roads, which means a reduction of only 13% over three years. Hence, assuming a similar type of effort, it is likely that only 40% of the target set will be reached by 2010.

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<sup>1</sup> The European Transport Safety Council (ETSC) is an independent non-profit making organisation dedicated to the reduction of the number and severity of transport crash injuries in Europe. The Council brings together experts of international reputation and representatives of a wide range of national and European organisations to exchange experience and knowledge and to identify and promote research-based contributions to transport safety. [www.etsc.be](http://www.etsc.be)

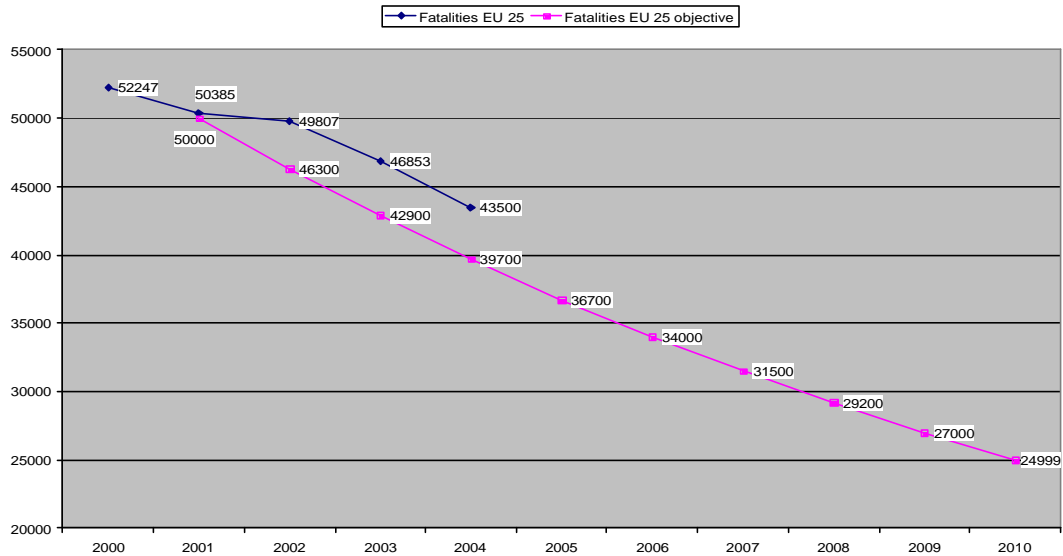


Fig.1 Progress towards the EU 2010 Target. Source: CARE (EU road accident database)

As ETSC has been arguing in the past, preventing road death and disabling injury requires a traffic system that is better adapted to the needs, errors and physical vulnerabilities of its users rather than one which expects users to cope with increasingly demanding conditions. Consequently, our response to the mid-term review of the White Paper stresses the importance of a better adaptation of all elements of the transport system to the needs of all transport users in all EU countries. A stronger political will is also urgently needed to ensure that subsidiarity is not being used as an excuse for Member States to resist European legislative proposals that could help reducing the burden of road accidents on society and individuals. The current toleration of disproportionate levels of deaths and injury on the roads in the EU has to be shaken; much of them are known to be avoidable at affordable cost.

In the White Paper, the Commission has rashly announced that it would give priority to exchange of good practice but reserves the right to propose legislation if there is no drop in the number of accidents in 2005. The Commission has now only five years to translate good intentions on paper into successful interventions on the road. The mid-term review can help decrease the individual and societal burden from road accidents – but only if it really qualifies as a review, which is to say as analysis followed by action, including legislative if necessary.

ETSC welcomes the approach of sharing responsibilities and looks forward to contributing with its share to achieving the target. But sharing responsibilities can not be a way of rejecting or diverting responsibility. The development of guidelines on implementing best practice by Member States should not replace the need for an EU Directive on the matter, but should instead represent a step toward concise legislation at EU level. The White Paper failed to introduce a timescale for actions; nor does it say which actions are going to deliver what kind of results. Hopefully the mid term review will provide a good opportunity to develop the kind of milestones that are necessary to measure progress and show the road to successful implementation.

## Increased inequalities within the EU

### 5. What are the trends as regards road safety?

#### Some regions are safer than others

Looking at the current situation it becomes apparent that some EU citizens face a much higher risk of dying in a road accident in their home country than do others, and that many are confronted with much higher levels of risk when traveling abroad either for work or for leisure than they are at home. With the enlargement process, the differences in risk between the best and worst performing Member States have increased. Despite significant improvements over the 1990s, the average fatality risk in the Southern, Central and Eastern European Countries is about three times higher than the EU average.

Against this background, ETSC launched the "SEC Belt" project in 2004 to promote best practice and monitor the progress in transport safety in those countries which have a higher road risk than the EU-15 average. These "SEC-Belt" countries, with SEC standing for Southern, Eastern and Central European countries, include all the new EU Member States, but also Italy, France, Belgium, Portugal, Spain and Greece. Economic and social cohesion is one of the overarching goals of European integration. As the safe movement of people and goods across Europe is one of the many factors contributing to its achievement, the EU has an obligation to act.

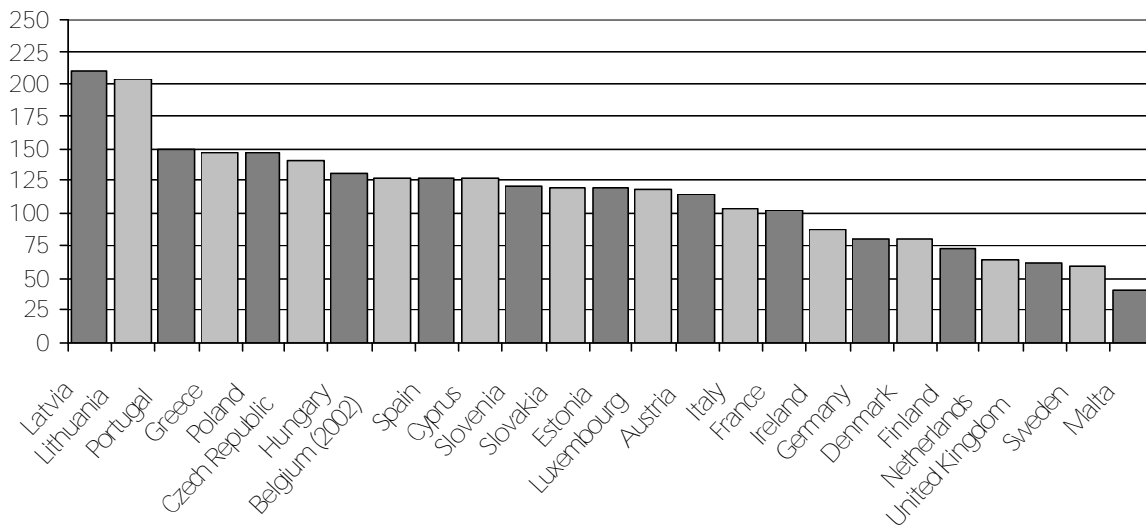


Fig.2: Road accident deaths per million population for 2003. Source: ETSC

## Some road users are safer than others

There are also substantial differences between the safety of the different categories of users within the road mode. While car users comprise the greatest proportion of overall road deaths (57 per cent), the risk of death on EU roads is substantially higher for vulnerable road users – some 8-9 times higher for pedestrians and cyclists. But there are measures that can truly improve the situation of younger and older pedestrians and cyclists in Europe. Such measures would apply a systemic approach to road safety advocating effective and stronger enforcement of traffic laws especially legal speed limits in urban areas, as well as measures improving the design and construction of vehicles and roads to account for human behaviour. The statistics for motorcyclists are also particularly worrying. If the actual trend continues, in 2010 one out of three road fatalities might be a motorcyclist instead of one out of six today.

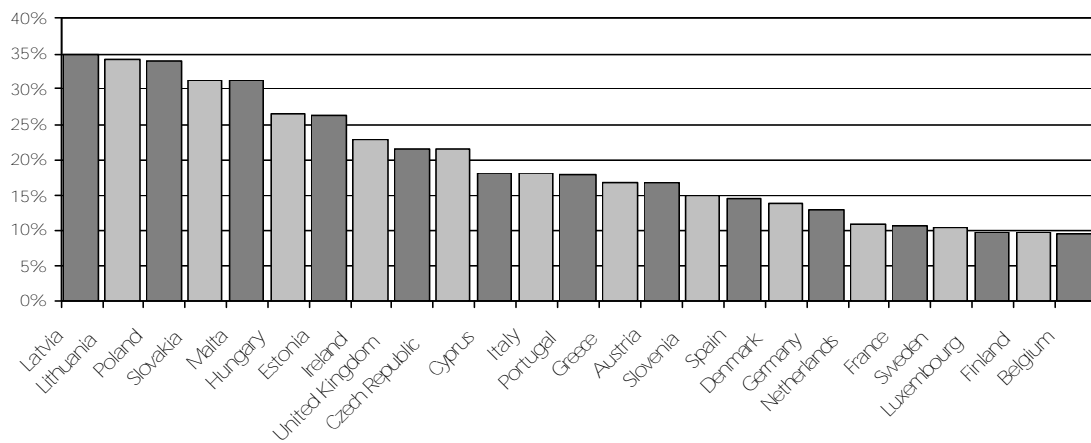


Fig.3: Pedestrian deaths as a proportion of all deaths, 2002. Source: ETSC

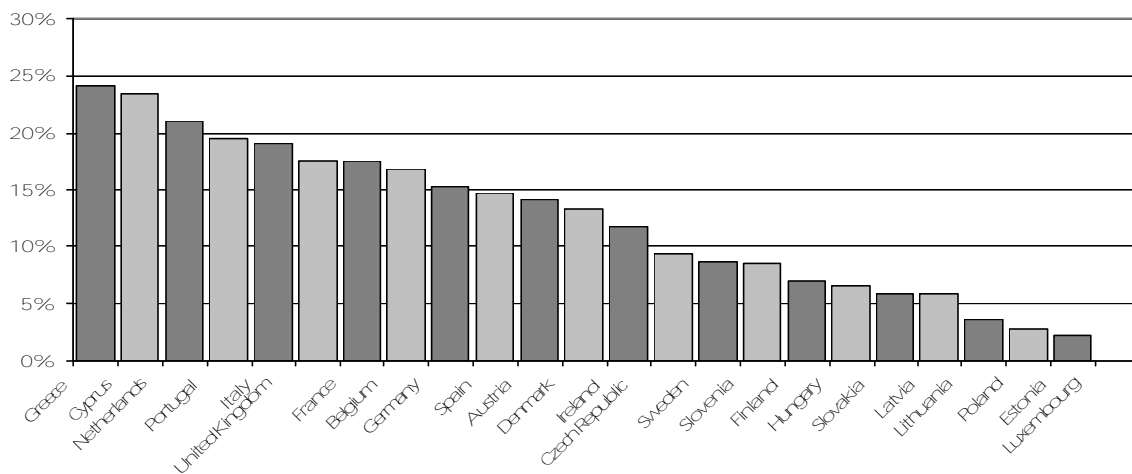


Fig.4: Motorised two-wheelers deaths as a proportion of all deaths, 2002. Source: ETSC

## Priorities for the future

### 8. What actions of the White Paper need to be reinforced?

#### Give transport safety equal consideration to economic and environment considerations

ETSC welcomes the European Commission's acknowledgment in the White Paper that safer mobility of European citizens is a key objective in EU transport policy. However, ETSC is concerned that transport safety as a whole has not been given explicit consideration equal to economic and environmental considerations of transport policy in the White Paper. While a range of ad hoc measures are proposed, an explicit transport safety strategy covering each of the modes and encouraging the use of the safer ones is missing.

ETSC notes that the European Parliament has set out in its Report on the 3<sup>rd</sup> Road Safety Action Programme clear lines for strategic action and support for demonstrably effective measures.

#### Develop a compelling vision

A prerequisite for effective action to reduce death and injury in traffic collisions radically is a strongly felt and lasting motivation for change which is sufficient to root out and overcome deep-seated tolerance of disproportionate numbers of people being killed or injured on the roads. One way of generating and communicating such a motivation for change is by promoting an inspiring vision of safer road use. One possible and, we believe, highly appropriate vision for an enlarged European Union would be to jointly work towards reduced road risk in a larger Europe by providing for a fairer distribution of safety across the EU at the highest practicable level. This vision appeals to the core of European policy-making in calling for the elimination of regional disparities in transport risk by harmonising the level of risk downwards.

The vision must be understood in geographic, social and modal dimensions. The vision of offering an equally safe mobility to all European Citizens should provide the kind of motivation that is necessary for all European actors to join forces and coordinate their efforts. It will help the European Commission to reach its numerical target by generating the commitment from public and private organisations alike that is the precondition for a durable EU-wide improvement in road safety.

Apart from offering a challenging target and compelling vision, any road safety plan needs a strategy that has bite. Whilst a target without a vision can lack direction, a target without a strategy is toothless. But in order to develop effective measures to reduce the number of killed or injured people, it is necessary to understand the process that leads to accidents.

## Establish an independent accident investigation for all transport modes

EU accident and casualty databases covering all the transport modes are needed to describe better the current state of transport safety across the EU to monitor common transport policies and to help define priorities. Against this background, ETSC has called on the EU to introduce the same mandatory independent accident investigation requirements for maritime and rail transport, as are in place in aviation and to improve the level of information available on EU transport crashes.

EU action is also needed to ensure accident investigation findings are made public; that a timely response is made to safety recommendations and that the lessons learned from accident investigations and the safety recommendations that follow are shared freely between Member States. In addition to that, the Commission's road accident information system- CARE- needs further development with updated, new and in-depth data and should be made more widely accessible.

## 9. Which should be the priority actions between now and 2010?

### Provide safer road infrastructure

If the European Union is, as it seems, not capable to achieve its Transport White Paper objective of moving road transport to safer modes, it should at least ensure that European road infrastructure provides for a safer distribution of goods and people. The way forward would be an infrastructure safety package that really deserves its name.

Besides the vehicle and the driver, infrastructure is the third pillar of any comprehensive road safety work. Road infrastructure improvements can make a significant contribution towards reducing the frequency and seriousness of road traffic accidents. Configuration of the road is thought to play a role in as many as one in three accidents. The infrastructure safety Directive should require Member States to carry out safety audits and safety impact assessments for EU-funded infrastructure. It should also include guidelines in the fields of urban safety management, speed reduction, low cost measures and safety audits. It should encourage Member States to take pride in their roads and implement Best Practices.

### Implement the EC's Recommendation on enforcement

ETSC has been monitoring how EU countries have implemented the European Commission Recommendation on enforcement in the field of road safety (European Commission, 2003), and evaluating how successful their enforcement strategies have been. To this end, ETSC set up an Enforcement Programme over three years from 2004 to 2007. The main aims of the programme are to generate and disseminate new knowledge on progress made in different countries and to share experiences on best practice in police enforcement.

The implementation of the EC Recommendation on enforcement in the field of road safety should be a top priority in saving up to 14,000 lives by 2010, in the EU-15 alone. The European Commission must continue to fulfill its role in monitoring the implementation of the Recommendation. However, in parallel it should propose to introduce binding EU legislation such as a Directive in order to ensure higher levels of enforcement are undertaken. This Directive should aim to ensure the introduction of effective enforcement through minimum requirements addressed to all Member States. Given the evidence gathered by ETSC, although progress has been made, not enough efforts to considerably increase enforcement in all three areas are being made by all the EU 25 Member States. Moreover, as stated enforcement leads to a rapid reduction in deaths and injuries and is supported by a large share of the European public (SARTRE). Experience has shown that it can lead to swift reductions in fatalities and injuries in countries such as France who raise their enforcement efforts in combination with a high level of political will.

### Propose a Directive on Cross-border enforcement

Lack of compliance with traffic law by non-resident drivers remains a particularly serious problem in important transit countries. Currently bi-lateral co-operation agreements exist but are, on the whole, unable to tackle the complex problems posed by cross-border enforcement of traffic law. Member States follow up offences, carrying both financial penalties and driving restrictions, in a piecemeal and often resource intensive manner. Yet, in the case of financial penalties, both the legal basis for EU legislation and the necessary frameworks for information exchange exist. Furthermore VERA 2, a Commission funded study, recommended that a European Directive be prepared. ETSC would support the proposal of a Directive on cross-border enforcement of traffic law to improve road traffic law enforcement, leading to greater safety on all of Europe's roads.

### Speed up the use of compliance enhancing in-car technologies

Further development and introduction of enforcement technologies such as alcohol inter-locks, seat-belt reminders and Intelligent Speed Adaptation (ISA) devices, alongside police enforcement, have an important role to play in securing compliance with key traffic rules. These Intelligent Transport Systems (ITS) could make a strong contribution in the short term to encouraging safer behaviour. In a Policy Paper on "In-Car Enforcement Technologies Today", ETSC urges the European Commission to:

- Ensure high and uniform standards and a highest reliability of alcohol inter-locks, seat belt reminders and Intelligent Speed Adaptation devices;
- Encourage EU projects related to the technological development of an EU-wide interface for digital maps and to its incremental updating;
- Give ISA a more prominent role in the e-Safety initiative, which aims to accelerate the development of ITS;
- Set up best practice guidelines to stimulate the use of Alcolocks in rehabilitation programmes and in commercial transport;

- Ensure that all cars manufactured in Europe have seat-belt reminders for the front driver; this should then be extended as quickly as possible to the front and rear passenger seats;
- Set up financial instruments to help engaging the private sector to make safety more clearly one of the competitive goals for business.

## 10. What new additional actions between now and 2010 on safety issues?

### Provide safer road infrastructure

See above qu. 9.

### Propose a Directive on Cross-border enforcement

See above qu. 9

### Speed up the use of compliance enhancing in-car technologies

See above qu. 9

### Protect vulnerable road users by implementing cost-effective measures

ETSC's VOICE (Vulnerable Road User Organisations In Cooperation Across Europe) campaign was launched early in 2005 in order to raise awareness about the needs of vulnerable road users amongst policy makers at EU and local level. VOICE supports the implementation of a number of cost-effective measures to improve protection of pedestrians and cyclists:

- Reduce the aggressive nature of car fronts

The Commission should amend the current weak Directive on pedestrian protection and mandate the immediate adoption of the full European Enhanced Vehicle-safety Committee (EVVC) crash tests to assess the injuriousness of the fronts of passenger cars.

- Support EuroNCAP

There is no doubt that the European New Car Assessment Programme (EuroNCAP), which aims at testing and publishing new car safety against harmonised testing protocols, has dramatically improved car safety. But EuroNCAP needs to continue to evolve to provide manufacturers an incentive to improve all aspects of car safety. In other words, an independent consumer information programme should not attribute five stars to a car which performed poorly in pedestrian protection. The Commission should actively encourage EuroNCAP to combine pedestrian and child restraint performance with occupant ratings and to award an overall rating to the tested cars.



- Daytime running lights

A meta-analysis of the effects of daytime running lights in cars has shown that the measure contributes substantially to reducing the number of pedestrians and cyclists hit by cars, by respectively 15% and 10% (ETSC, The Safety of Vulnerable Road Users in SEC-Belt Countries, 2005). The Commission should give early consideration to a mandatory fitment requirement of daytime running lights to all motorised road vehicles.

- Retrofitting of blind spot mirrors for trucks

Every year a large number of vulnerable road users are killed or severely injured because of trucks turning right. The main cause of these accidents is the bad visibility field of the truck driver on the right side of the vehicle. Trucks with a gross weight over 7.5t already have to be equipped. The Commission should propose a Directive mandating the retrofitting of lateral blind spot mirrors to the existing fleet of goods vehicle over 3.5t.

#### Reference:

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Transport safety performance indicators in the EU, ETSC, 2001  
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Costs-Benefit Analysis of Road Safety Improvements, ICF Consulting, 2003

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