



Public consultation on "Fitting blind spot mirrors on existing trucks".

Position of the European Transport Safety Council (ETSC)

GENERAL COMMENT

The European Transport Safety Council welcomes the consultation on "Fitting blind spot mirrors on existing trucks". A safe, sustainable and efficient transport system is essential for the European Union and its economic and social development.

When the European Commission adopted its 3rd Road Safety Action Programme in 2003 (2003-2010) to halve the number of road accident victims in the European Union by 2010, it also committed to carry out a Mid-term Review in 2005 and to propose legislation if there was no drop in the number of deaths. However this Review was delayed and has not included any legislative proposal to the disappointment of road safety stakeholders, including ETSC.

Given the short time available until 2010 ETSC would urge the European Commission to swiftly adopt the proposed legislation on the retro-fitting of blind spot mirrors.

Facts and figures of road safety in Europe

The 3rd Road Safety Action Programme promises to reduce by half the number of road deaths by 2010. This means a reduction of 25,000 at least of total deaths in the EU25 out of the 50,000 lives taken every year in road accidents.

Road transport remains the main cause of death among all EU citizens under the age of 45. It kills around 115 persons every day, the equivalent of a medium-sized plane accident with no survivors. The costs of road accidents are estimated to be euros 180 billion.

Despite some laudable isolated national achievements, EU road safety policy is far from a success story and the gap between the best- and the worst-



performing Member States is widening. The Commission estimates that, in 2005, approximately 41,600 people were killed on European roads, which means a reduction of only 17.5% since 2001, somewhat off the 25% needed for the EU to be on course to achieve the target of halving road deaths by 2010.

The risk of death on EU roads is substantially higher for vulnerable road users (8-9 times higher for pedestrians and cyclists). The statistics for motorcyclists are also particularly worrying. If the actual trend continues, in 2010 one out of three road deaths might be a motorcyclist instead of one out of six today.

The average death risk in the Southern, Central and Eastern European countries (the "SEC Belt countries") is about three times higher than the EU average. Deaths continue to rise in certain Member States already at the bottom end of the table, such as Poland, Lithuania, Portugal, Estonia and Hungary.

The Mid-term Review, monitors national targets and measures implemented, and will only deliver its results if the analysis is also followed by action, including legislative if necessary. But there was no legislation proposal accompanying the Mid-term Review. The 3rd Road Safety Action Programme also failed to introduce a timescale for actions and a clear indication of which actions will deliver what kind of results. The Commission has now only four years to translate good intentions on paper into successful interventions on the road.

SPECIFIC COMMENTS ON THE CONSULTATION ON "FITTING BLIND-SPOT MIRRORS ON EXISTING TRUCKS"

1. Background

Every year a large number of road users (mainly 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.

The mirror systems for trucks were first regulated in the Council Directive 71/127/EEC. Trucks with a gross weight over 7.5 tonnes had to be equipped with two mirrors outside (left and right), one mirror outside with a wide



angle and one special mirror for the right side to recognise bicycle riders or pedestrians. Based on real accident investigations it became apparent that the view out of trucks, especially to see pedestrians and bicycle riders was still restricted. Furthermore, there was a high potential danger whilst manoeuvring or reversing a truck.

In November 2003, the European Parliament and Council adopted Directive 2003/97/EC on rear view mirrors and supplementary indirect vision systems for motor vehicles. This Directive will improve vulnerable road users' safety by upgrading the performance of rear view mirrors and by accelerating the introduction of new technologies that increase the field of indirect vision for drivers. The first effect of these new rules should start to be seen on new models (over 3.5 tonnes) from 2006 onwards.

2. ETSC Position

ETSC welcomes the European Commission's consultation on fitting blind spot-mirrors on existing trucks.

ETSC shares the European Commission's concern that the replacement pace of trucks in Europe is rather slow and that the existing population of heavy goods vehicles will only be fully replaced in around 15 years. This implies that, if existing trucks are not retrofitted with blind spot mirrors, the risk to road users will not be substantially reduced and an opportunity to save as many as 400 lives a year will be lost.

Moreover, retrofitting of blind spot mirrors is not only an effective road safety measure but it is also a cost-effective one with the benefits outweighing the costs by a factor of 3.5. The high benefit to cost ratio is another good reason for swiftly proceeding with the adoption of this legislation.

Finally, the circumstance that four Member States (Belgium, Denmark, Germany and the Netherlands) have already implemented national schemes for the retrofitting of heavy goods vehicles with blind spot mirrors should fortify the European Commission in its proposals as these countries have shown that the retrofitting is easily feasible.

In summary, ETSC encourages the Commission to adopt the long awaited legislation on retrofitting of blind spot mirrors to existing vehicles above 3.5 tonnes. ETSC also agrees with the Commission's intention to exempt from



the new legislation vehicles built before 1998 (for which the costs of retrofitting would be higher than the benefits) and vehicles for which retrofitting may require substantial changes in the cabin structure or for which the mounting height for the close proximity mirror is lower than 2.0 metres.