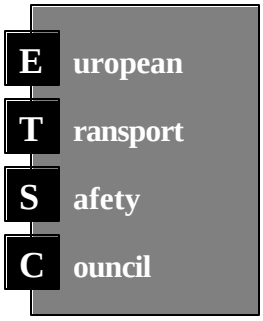

Towards reduced road risk in a larger Europe

Providing for a fairer distribution of safety across the EU

*The **European Transport Safety Council's** response to the 3rd Road Safety Action Programme*

Table of Contents

Introduction

On 2 June 2003, the European Commission adopted its 3rd Road Safety Action Programme (2003-2010) **"Halving the number of road accident victims in the European Union by 2010: A shared responsibility".** The prime purpose of this plan is to present the action that the Commission seeks to undertake in order to meet its ambitious target of halving the number of road accidents victims in the European Union by 2010. Extending the scope and duration of the two first Road Safety Action Programmes and acknowledging other crucial EU road safety dossiers such as the Communication on Priorities in EU Road Safety (COM(2000) 125), the 3rd Action Programme provides a unique opportunity for setting out a comprehensive long-term strategy guided by a numerical target.

It is important to notice that road crashes in the EU each year:

- Kill almost 39,000 EU citizens
- Kill around 110 persons every day: the equivalent of a medium-sized plane accident with no survivors
- Cause more than 3 million injuries when under-reporting is taken into account.
- Cost around 180 billion € - around twice the total EU budget for all activity - more than pollution, congestion, cancer and heart disease.

In view of these facts and the societal challenge to reduce injury risk and road deaths, ETSC clearly welcomes the timely, although delayed, adoption by the European Commission of its very ambitious 3rd Road Safety Action Programme (RSAP). As Europe's sole NGO dedicated to improving transport safety across all member states and across all transport user groups, ETSC generally endorses the approach taken and the measures proposed by the Commission. In total, the plan represents a well-equipped tool box of actions to improve the level of safety on roads across Europe. But ETSC calls for a more urgent and robust approach by the EU and Member States to the use of these tools.

As the plan suggests, and 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 3rd RSAP stresses a **better adaptation of all elements of the transport system to the needs of all transport users in all EU countries**. ETSC expects from a long-term road safety plan that it makes a tangible and of course measurable, contribution towards **reduced road risk in an enlarged Europe** by providing for a **fairer distribution of safety across the European Union at the highest practicable level – that is by harmonising upwards**.

Against this background, ETSC strongly supports the approach taken by the European Commission emphasising the need for "shared responsibilities" in European road safety policies. The EU and each current and future Member State should continually and robustly challenge society's complacency about the level of risk in using the roads by adopting or further developing road safety strategies which evoke and channel coherent and effective action by all those stakeholders within and outside government who can contribute to reducing death and injury on the roads.

Clearly, road safety work in a European society cannot be the task of governmental bodies only – no matter whether they are European, national, regional or local. In order to be effective, it is important to involve the private sector and NGOs in efforts to influence road user behaviour. The 3rd RSAP, therefore, rightly stresses the need for sharing responsibility.

One way to engage the private sector is to make safety more clearly one of the competitive goals of business, thereby ensuring that a liberalised transport sector does not suffer from a reduction in the level of protection, as has been the case with some former liberalisation processes. The EU should therefore promote financial instruments in order to support the creation of a European market for safety.

One example for the kind of safety market that ETSC envisions is given by the intention of the European Commission to explore together with the insurance industry the possibility of tariffs based on a vehicle's accident rating as well as that of the driver. ETSC thinks that accident premiums could be adjusted according to crash tests results of the EuroNCAP consumer information programme for occupant and pedestrian protection and also according to child restraint systems. Another example is the Commission declaring to continue the support for the EuroNCAP programme. Occupant protection has become a selling argument for the car industry and we see more and more cars gaining on average 4-5 stars for occupant protection[1]. However, an undistorted and properly regulated vehicle safety market would mean that pedestrian protection becomes an integral part of a more holistic assessment programme. In other words, no car should be advertised as a "safe car" on the basis of its 5 stars, when it merely receives 1 star for pedestrian protection[2]. A final example is to link a harmonised EU passenger car taxation to the safety level of cars. In a recent opinion, the Transport Committee of the EP called upon the European Commission for an EU framework for fiscal incentives for road safety[3].

In any case, though, the establishment of a market place for safety must happen under the guidance of a regulatory body that considers all interests equally and involves all stakeholders fairly. Eventually, further liberalisation of the transport market can only be realised by governmental bodies that are capable of showing the kind of "**political leadership**" that is necessary to work towards a strengthening of safety's influence upon the working of the market within the EU. Consequently, sharing responsibility with the private sector or promoting public private road safety partnerships, does not free the political decision-makers in Europe from significantly improving the legislative framework within road safety.

The need for bringing about a fairer distribution of safety at the highest practicable level in a liberalised transport economy is obvious. The EU can no longer accept giving away lives by delay and failure in implementing known and affordable safety measures. The current toleration of disproportionate levels of deaths and injury on the roads in the EU has to be shaken. Much current death and injury on the roads is known to be avoidable at affordable cost, and appropriate investment in casualty reduction is known to yield returns that are very high by both commercial and public sector standards.

[1] Each star rating represents around a 12% reduction in fatality risk

[2] Of the 12 cars which by July 2003 gained 5 stars in occupant protection, 6 gained only 1 star in pedestrian protection, 3 cars gained 2 stars and 3 were not tested.

[3] Opinion of the RETT Committee to the Economic and Monetary Affairs Committee on the Commission's proposal COM (2002) 0431 on passenger's car taxation.

Against the background of the need for immediate EU-wide action in transport safety policies, this response by the European Transport Safety Council to the 3rd Road Safety Action Programme contains two parts: the first expresses ETSC's general reaction to the development of road safety policies foreseen by the plan, and the second presents specific comments on the actions proposed by the Commission.

– Part I –

Framing the EU target: The need for a compelling vision and a strategy with bite

A long-term plan should at least contain three elements: a **challenging** (yet achievable) **target**, a **compelling vision** and a **gripping strategy**. The first of these three elements is clearly provided by the *challenging* 50% reduction target. But is this target also *achievable* and, if so, how? The answers to this and other questions are given by the three sections that follow, in that they address some of the most important omissions of the action plan and present policy recommendations that are capable of filling the plan's most important gaps, such as those in the Commissions strategy for reaching its target.

1. 20, 000

ETSC welcomes the very ambitious aspirational EU target to cut road deaths. Experiences in EU Member States have shown that setting and implementing a road safety target leads to a higher safety performance on a national level. Therefore, the target established by the European Commission can be considered to be based on good practice and offers the prospect of achieving a reduction in the level of risk to users of roads within the EU.

ETSC believes that numerical targets for road casualty reduction must be challenging enough to motivate all the stakeholders to strenuous effort. Yet, ETSC believes that a balance must be sought between what is challenging and what is achievable.

1.1 A *challenging* target…

The target chosen by the Commission is to reduce road deaths by 50% by the year 2010 (20,000 deaths). ETSC strongly supports the Commission's ambitious target but notes that the targeted level of safety performance across the EU as a whole is more challenging than has ever been achieved in their own territories by even the best performing Member States (UK and Sweden) or proposed by safety organisations, as the figure below shows.

Figure 1 illustrates the targets set by each country and by the EU. It shows time on the horizontal axis and deaths on the roads per million person-years (i.e. annual numbers of deaths per million inhabitants) on the vertical axis. The slopes are seen to be rather similar except for France and the EU, for which the steep slopes indicate the ambitious nature of the targets that has already been remarked upon.

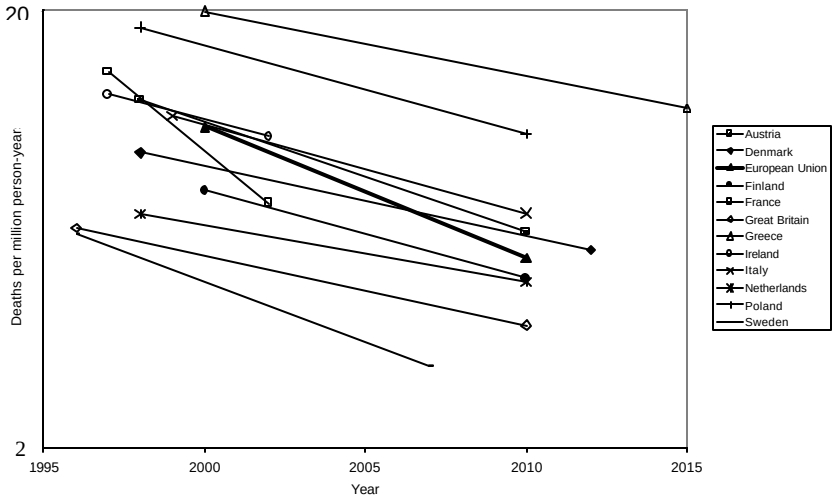

Figure 1. Targets for reductions of numbers killed or KSI (killed and seriously injured) on the roads.

1.2 ...but is it also an *achievable* one?

The purpose of setting a casualty reduction target is generally accepted to be to provide a common goal for those involved with improving road safety. The target should be ***challenging*** in order to avoid complacency and focus efforts on the most effective measures. If the target is not challenging then a major opportunity for encouraging the saving of lives will have been lost. On the other hand, in order to gain the support of the many people whose co-operation will be needed if the target is to be attained, the target needs to be ***achievable***. If key people involved in improving road safety come to believe that a target has been set that is too demanding and which cannot be achieved, they will lose motivation and it will be difficult to make progress.

The process of setting up a target also needs to take into account the forecasting of casualty rates. A forecast is not the same as a target, but there are good reasons to build a target on casualty forecasts that are soundly based upon knowledge of what has occurred in the recent past. The casualty changes over the previous years show what has been achieved by national and local efforts to improve road safety, applying the level of resources that the country's political system has judged to be appropriate. Consequently, a forecast representing the continuation of recent trends shows what might be expected if these efforts were to continue at broadly the same rate in the coming years. This is the starting point for assessing what may *realistically* be achieved in future with additional efforts.

Yet the forecasting of casualty rates for the existing Member States, let alone the higher injury risks of the accession countries, has not been undertaken when setting the EU target. ETSC's casualty forecasts for the EU 15 predict a reduction of road deaths only to 27,000 in 2010. This implies that the EU target will not be achieved unless the EU takes additional actions that reduce the fatality risks more rapidly than in the past. Experience shows that setting a target is a meaningless act unless backed up by commensurate practical attempts to reach it.

Moreover, in 2004, 10 new Member States with generally higher road crash injury risks than many existing Member States will join the EU. Casualty forecasts for the 10 accession countries predict a total of more than 8,000 deaths in 2010[4]. This means either a supplementary target for the new Member States or a substantial and carefully judged increase in the target of 20,000. The European Commission should also define a list of priority actions for the 10 new Member States like it did with its 2000 Communication where it listed road safety priorities for the existing EU Member States.

Recommendations

- In principle, the EU should focus its road safety strategies by setting numerical targets for casualty reduction over the period covered by the strategy which are challenging enough to motivate the stakeholders to strenuous effort, yet achievable through the policies and measures envisaged in the strategies.
- Experience of different aspects of the target-setting process, especially the forecasting of casualty rates and of the effectiveness of safety measures[5], should be shared among the EU, the Member States and the Accession Countries.

1.3 Transport Safety Performance Indicators – The stepping stones towards achievement

ETSC strongly welcomes the use of safety performance indicators. It is clear that simply counting crashes or deaths is an imperfect indicator of the level of transport safety. In order to develop effective measures to reduce the number of accidents or the number of killed or injured people, it is necessary to understand the process that leads to accidents. Transport safety performance indicators can then quantify some aspects of this process.

Alongside the number of deaths as a performance indicator, and similarly important in human and economic terms, is the number of people seriously injured, but this indicator can hardly yet be used at the EU level for target setting or measurement of progress because of differences between Member States in definitions and reporting procedures. Harmonisation is needed in this area to enable this important indicator to be used

Among the other road safety performance indicators most commonly used are those that relate to behavioural characteristics such as speed levels, the rate of drink driving and the use of seat belts. In addition, a number of infrastructure, vehicle or trauma-related indicators are relevant. These provide a more straightforward means of monitoring the impact of a measure or programme and enable early, target-oriented adjustments of specific interventions.

Although the European Commission acknowledges the importance of transport safety performance indicators in the 3rd RSAP, they do not receive the attention they deserve. There is no clear identification of which performance indicators will be adopted at EU level and how they will be monitored.

[4] ETSC (2003) Transport safety performance in the EU - a statistical overview
[5] As for instance outlined in the Communication on Priorities in EU Road Safety- Progress Report and Ranking of Actions COM (2000)125 final.

Within broad targets for reduction of death or injury, sub-targets can be set for particular administrative areas or types of road. Sub-targets addressing specific road safety problems can also be helpful, such as specific types of collision or the involvement of specific road user groups. It is, however, important that sub-targets are consistent with the main targets, and that they should not constrain the allocation of resources among safety measures as to reduce the cost-effectiveness of the whole programme of measures unduly.

Recommendations

- The EU needs to define a list of safety performance indicators that should be used by national authorities and reported to the European Commission regularly.
- These should include a harmonised definition of serious injury so that casualty reduction targets can be set for numbers injured as well as numbers killed.
- Sub-targets for particular groups or for observable aspects of road user behaviour or quantifiable outputs of road safety work can be helpful provided that they are consistent with the principal targets and do not unduly constrain the allocation of resources to casualty reduction.

2. A target without a *compelling* vision can lack direction

ETSC regrets that the 3rd Road Safety Action Programme does not contain any vision of an integrated European road safety policy. As pointed out by well-known experts at ETSC's Best in Europe Conference on "Targeted Road Safety Programme in the EU", it can be very helpful in raising the sights of decision-makers and contributors to road safety work for a targeted road safety programme to be accompanied by a vision, such as the "Vision Zero" in Sweden.

A prerequisite for effective action to reduce death and injury in road 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. This motivation for change has to extend to enough opinion-formers and decision-makers eventually to convince all the relevant stakeholders. One way of generating and communicating such a motivation for change is by promoting an inspiring vision of safer road use. To achieve the necessary shift in the mind-set of decision-makers and stakeholders, the vision needs to be further-reaching and medium to long term, looking beyond what is immediately achievable (ETSC, 2003).

On this view, in order to be successful in reducing road deaths, the EU should adopt its own vision. Although the 3rd RSAP presents a theme ("road safety – a shared responsibility") it does not accompany its target with a vision. 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.

This vision must be understood in geographic, social and modal dimensions. The vision of offering an equally safe mobility to all European Citizens should be providing 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.

2.1 Some *modes* are safer than others

There are *substantial differences between the safety of the different modes of transport*. Despite recognizing that road travel has by far the highest risk of death per unit of distance travelled or per time spent travelling, the European Commission does not recommend a policy of modal shift, promoting the use of safer forms of transport.

The safety record of public transport is in many circumstances much better than for private road transport. ETSC expects effective Community policy to be introduced which will encourage Member States to maximise the advantage of these safety levels by promoting modal shift towards public transport where the balance of advantage to travellers makes this feasible.

Recommendations

- As outlined in its White Paper on the common transport policy, the European Commission should promote the modal shift to the use of safer transport modes.

2.2 Some *regions* are safer than others

The *inequalities in the safety levels* also concern Member States and particularly some regions of the European Union. There is a belt of Southern and Central and Eastern European countries ("SEC-Belt") in which the levels of risk in using the roads are much higher than in North-western Europe.

Against this background, it needs to be highlighted that economic and social cohesion is one of the overarching goals of European integration. The safe movement of people and goods across Europe is one of the many factors contributing to its achievement. However, 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 travelling abroad either for work or for leisure than they are at home.

The SEC-Safety Belt

Below EU average

MS and Accession Countries above EU average

Non-MS and non-Accession Countries above the EU average

The majority of the nearly 39,000 annual road deaths occur in the most heavily motorised countries - Germany, France, Italy, Spain and the United Kingdom. The highest risks (per billion motor vehicle km) are encountered in Greece, Portugal, Spain, France, Belgium and Austria. For example:

- The Greek road fatality risk per billion motor vehicle is over 5 times greater than the UK one.
- France and the UK have about the same number of inhabitants, but France has about twice the number of deaths on the roads as the UK as its risk is twice as high.

Safety at all levels

What kind of subsidiarity is necessary?

The gross inequalities between European regions and member states in terms of road safety illustrate one principal axiom of contemporary transport safety policies: local, regional and national governments *alone* are not able to provide for a policy framework that ensures the highest practicable level as well as fair distribution of safety across the European Union.

With an increasing internationalisation of transport flows, vehicle standards, infrastructure planning and individual mobility patterns, road safety clearly becomes a core domain in European road safety policies. With the Treaty of Amsterdam, member States have acknowledged this Community competence to take measures to promote transport safety (Article 71 of the EU Treaty) and to deliver a high level of protection in the harmonisation process Article 95(3). Clearly, road safety is an area for EU legislation and legislation in road safety has an added value for all Member States.

When the Commission speaks of sharing responsibilities in its 3rd Road Safety Action Programme, it commits itself to inviting all stakeholders to take part in shaping and implementing European road safety policies. ETSC welcomes this approach and looks forward to contributing with its share to achieving the 2010 target. But ETSC also reminds the European Commission as well as the European Council and Parliament to fulfil their responsibilities, laid down in the Treaty, of legislating for road safety in Europe. Sharing responsibility cannot be a way of rejecting or diverting responsibility. For example, the development of guidelines on implementing Best Practice by member states should not replace, or remove the need for, an EU Directive on this matter, but should instead represent a step towards concise legislation at EU level.

Especially if the Commission endorses the ETSC vision and wishes to work jointly towards a fairer distribution of safety on the highest possible level across Europe, it has to assign more importance to its unique competence in implementing and monitoring targets and performance indicators in EU member states. Such an approach will have to show an understanding of subsidiarity that emphasises the responsibilities of "higher" political levels of governance to reach the sort of decisions which "lower" political levels are unable to make.

With the enlargement process, the differences in risk between the best and the worst performing Member State will become even greater. Despite significant improvements over the 1990s the average fatality risk in the 10 accession countries is about 3 times higher than the EU average, only slightly higher than that of Greece (worst performing EU country) but 5 times higher than the UK's (best performing EU country).

The principal reason for this state of affairs is that adequate administrative structures to support road safety often only started to be established in the 1990s in response to rising problems. Enforcement is still lagging behind and an old vehicle fleet also poses problems. Chronic underinvestment also means that road infrastructures are underdeveloped.

Despite recent improvements, road safety still needs to be given much greater weight, not only in the Accession but also in the Southern European Countries. It is cardinal that

the focus is not only on the extension of the TENs but also on how to help the badly performing states catch up in terms of safety. In the Accession Countries this is accentuated by an ever increasing reliance on roads for both freight and passenger transport. Initiatives[6] aiming to transfer expertise from the current to the new member states go in the right direction but are too few to have a sufficient impact.

2.3 Some *road users* are safer than others

There 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, the risk of death per unit distance travelled on EU roads is substantially higher for vulnerable road users.

The highest death rate by far in road transport is that of two-wheeled motor vehicle users. Both per unit time spent and per unit distance travelled, the risk of death in motorcycle or moped travel death risk is around 20 times higher than for car travel. Similarly, the risk of death while walking or cycling is up to 3 times as great per unit time and up to 9 times as great per unit distance as when travelling by car. On the other hand, the risk to car occupants is 10 (per unit distance) and 12 (per unit time) times greater than to bus occupants. Risks do not only vary between different categories of road users but also within the single categories mentioned above, according to the age of road users.

The difference in the safety levels of the different categories of road users will be even more greatly accentuated in the future, influenced by two factors: enlargement and the ageing of society. Vulnerable road users face even greater risks in the Accession Countries than in the current Member States. With an ever greater proportion of older people living among us, trying to prevent ageing from bringing with it higher risks on the roads will become increasingly important and challenging.

Recommendations

- The EU needs particularly to take actions to achieve a better balance between the safety of vulnerable road users and the mobility of motor vehicle users especially in urban and residential areas.
- The EU should invest more resources in helping the SEC-Belt Countries to reduce risk on their roads.

[6] such as the PHARE Multi Country Road Safety Project.

3. A strategy without bite? The need for binding EU legislation

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*.

Any strategy requires action to implement it, and the EU has substantial grounds to act given the common nature of transport safety problems, the huge added value EU transport safety policies can bring, and not least, the clear shared and exclusive responsibilities set out in the EU Treaty.

In light of the fact that the road safety action plan deals with some of the most severe risks of transport, ETSC thinks that the RSAP is governed by an inappropriate caution. It runs the risk of remaining a toothless tiger if the identification of actions is not followed by substantive legislative actions at Community level. For example:

- While the Commission recognizes that legislation on mandatory crash helmets for users of two-wheelers could save up to 1,000 lives annually, it does not intend to propose legislation but will only support national initiatives to increase the rate of helmet use.
- The Commission also recognizes the high risks of novice drivers but will merely draft a recommendation on how to make provisional driving licences effective despite the fact that it has competence to create an EU graduated licensing system.
- While the European Commission identifies alcohol as a key factor to influence the level of safety, it will merely *encourage,* but not legally force, Member States to take up the recommendation to set the blood alcohol limit no higher than 0,5 promille.

3.1 No roadmap and timetable for actions

The Action Programme addresses well the common key safety problems but fails to introduce a timescale for actions; nor does it say which actions are going to deliver what kind of results. As well as having no time-table, the plan generally lacks the kind of milestones that are necessary to measure progress and show the road to a successful implementation. Three points are particularly important here.

Firstly, the 3rd RSAP does not contain any evaluation of the 2nd Road Safety Action Programme. Evaluation, feedback and monitoring of the effects of various road safety measures are highly important and common practice in sound safety policy-making. Without an evaluation of policy implementation, past mistakes are likely to be repeated. For example: despite an invitation by the European Parliament to prioritise the suggestions of the 2nd Action Programme for action[7], the 3rd RSAP once again does not prioritise actions.

Secondly, when considering EU road safety policy in the next decade, the 3rd RSAP should have answered the question: how will the new member states affect the EU road safety policies? The particular road safety problems of these countries are to be assessed only in the 2006 mid-term review.

[7] An invitation, to which the European Commission responded with a further road safety Communication COM (2000) 125 final outlining six top priority measures.

Thirdly, the 3rd RSAP presents a whole range of actions which will be difficult to deliver, given the shared responsibilities for many of the actions. In view of the responsibilities at different levels of government for different aspects of road safety, a successful EU-wide aspirational target cannot rely solely on activities at any one level for its achievement. Yet the Action Programme does not provide strong enough joint mechanisms between the EU and Member States on how to deliver the target. It also raises the issue of how the differences in ambitions between Member States will be tolerated. Despite Member States having agreed to the EU target at the Transport Council on 5 June 2003, several Member States have set lower targets.

Finally, the European Commission will carry out a mid-term review in 2006 and reserves the right to propose legislation if there is no drop in the number of deaths. This means that, if in 2006, the number of road deaths has not dropped significantly, the Commission will have only 4 years to meet a target it has recognised to be already difficult to reach on a 9-year basis!

Recommendation

- The EU should identify the route to achievement of its target, the respective roles of the EU and its Member States in doing so, and how the EU can help the Member States to deliver their respective contributions.

3.3 A plan standing in isolation

Apart from causing accident-related injury and death, road traffic poses one of the major problems to the human and natural environment today. However, the 3rd RSAP is not integrated into the overall European Transport Policy as it makes no reference at all to transport objectives and targets that can indeed make a substantial contribution to transport safety – such as promoting a shift towards safer modes of transport – nor to the possible impact of safety measures on other aspects of transport policy.

Although the plan recognises that, of all the transport modes, transport by road is the most dangerous and the most costly in terms of human lives, it seems to fear making the most logical conclusion of all: working towards modal shift in order to generally encourage the use of the safer modes of travel. Where the safer mode is also the more environmentally friendly, such policy would add additional weight to the 3rd RSAP, because it will lead to mutual benefits for both safety and the environment.

In the same way as the implementation of road safety policies ought to produce mutual benefits for both safety and the environment (in order to reduce the overall risks of transport), they need to be linked to public health policies. Road crashes have consequences in terms of death and injury which constitute a public health problem of whose size many decisions makers and road users may well be unaware[8].

[8] A few figures illustrate how road accidents are part of a wider public health problem:

- 1 in 3 citizens will need hospital treatment during their lifetime due to road crashes
- 1 in 80 citizens will end their life an average of 40 years too early due to road crashes

Again, safe and sustainable transport, in particular non-motorised modes, can play an important part in addressing several heath problems, by reducing pollution and contributing to physical activity. This is a further reason for trying to reduce the accident risk of walking and cycling, and more generally a reason why **health impact assessments** should be applied to all major EU transport projects and policies[9].

Recommendation

- The EU needs to achieve a stringent integration of road safety in all its policies.

- Road crashes cause 6 months shorter life expectancy
- Road crashes cause on average 2.5 years of expected health loss
- Road crashes cause the highest number of lost years of any cause of death

[9] European Parliament Resolution on the Impact of transport on public health T5-0086/2002 of 28 February 2002.

– Part II –

Measures that presume EU responsibility

The EU target of 50% reduction in road traffic deaths between 2000 and 2010 will not be achieved unless the EU takes additional actions that reduce the risk of death more rapidly than in the past. Therefore, it is recommended that further actions within the competence of the EU itself are taken and that an EU road safety fund is created for financial incentives that support and trigger national road safety actions and measures of proven effectiveness[10].

ETSC believes that if the EU intends to meet the target, the 3rd RSAP needs to be more ambitious in introducing demonstrably effective measures. The EU has broad scope to act on road safety and should act to address systematically the most important common road safety problems. All EU institutions have their distinct responsibilities for road safety, which should not just be *shared* but, more importantly, be *fulfilled coherently*.

Against this background, Part II of this response deals exclusively with measures mentioned in the 3rd RSAP, rather than addressing additional policies, strategies and measures which are not mentioned there.

1. Encouraging road users to improve their behaviour

The safe use of roads is a key objective for the EU. Enhancing the safe use of roads could be done in three complementary ways: securing greater road user compliance with key traffic safety rules, improved driver licensing and training and mandated use of protective equipment such as crash helmets for users of motorised two-wheelers.

1.1 Securing road user compliance with key traffic safety rules

Failing to comply with key traffic safety legislation – drinking and driving, excess speed, failure to wear seat belts or crash helmets – make a major contribution to the frequency or severity of road crashes. Experts estimate that if all current cost-effective enforcement strategies were to be applied by Member States in securing better compliance with such rules then 50% of deaths and serious injuries could be prevented. For example, the use of seat belts in motor vehicles reduces the risk of serious and fatal injury by half. If lower wearing rates were brought up to the best rate achieved internationally, then around 7,000 lives could be saved annually in EU countries.

Therefore, ETSC welcomes the fact that the European Commission will bring forward a Directive on enforcement in relation to drink/driving, seat belt use and speed. However, ETSC points out that it is very important that this Directive applies to both **commercial and private transport** and sets specific targets for increased compliance with the key traffic laws. These targets would specify in quantitative terms the offences to be enforced and the acceptable compliance level for each offence after enforcement (for example 95% seat belt use). The Directive should also set minimum checks requirements. For

[10] ETSC (2003) Cost-effective EU transport safety measures

example, every driver should have his BAC checked every month or every 1000 km of driving and his speed checked twice a month or every 500 km of driving.

Though the arrangements for doing so will vary from one country to another, the EU should nevertheless encourage the exchange of best practices on police checks, particularly in breath testing. The EU should also ensure that each member state implements a systematic collection of data at national level as a basis for exchanging best practice.

Moreover, ETSC regrets that the European Commission does not intend to accompany its requirement concerning increased enforcement of laws dealing with drink/driving and speeding by setting common target levels of compliance at EU level.

While **speed** contributes to around a third of fatal and serious crashes and is an important factor in determining injury severity, the European Commission does not intend to set at EU level common speed limits. In impacts with cars travelling at 60 km/h, most pedestrians do not survive, at 45 km/h, many pedestrians are seriously injured and almost half are killed; but at 30 km/h very few pedestrians are killed and most injuries are minor. Surveys across the EU show that around two thirds of drivers exceed the speed limit on urban roads and half exceed the limit on single carriageway rural roads. In The Netherlands 30 km/h zones generated a 22 per cent reduction in personal injury crashes.

While many accidents still result from **drinking and driving**, the European Commission does not intend to enforce its recommendation concerning the blood alcohol limit. Drivers with excess alcohol are responsible for around 10,000 EU deaths each year. A substantial reduction in drinking and driving above blood alcohol levels of 0.5 promille would make a large contribution to the improvement of road safety. Many of those affected would be required to make only small changes in their drinking habits, and those required to make large changes are only a small minority. ETSC experts estimate that implementation of the EU recommendation that the blood alcohol limit should not exceed 0.5 promille combined with a modest increase in enforcement could save around 1,000 lives annually.

The EU should also work towards the implementation of driver impairment detection devices e.g. alcohol interlock and driving fatigue detectors and the requirement for use of alcohol interlock by high-risk excess alcohol offenders and certain categories of professional driver.

Recommendations

- The EU should harmonise general speed limits on urban areas throughout the EU by requiring each Member State to impose its own limit at or below 50km/h and actively encourage 30km/h in residential areas.
- The EU should legislate to impose its recommendation that the blood alcohol limit (maximum permitted BAC) should not exceed 0,5 promille and for young novice drivers should not exceed 0,2 promille.

1.2 Adapting driver licensing, training and information to road user needs and vulnerabilities

The safe use of roads for all users is a key objective of driver licensing policies in Europe. Life-long road user training and information to encourage awareness of the risk of road crashes, the consequences of unsafe behaviour and sympathetic attitudes to effective countermeasures is a key strand of road safety work.

The 3rd RSAP proposes many actions but ETSC thinks that the European Commission should focus on the driving licensing of young novice drivers. In view of the high risk faced by young novice drivers and the fact that most of the 15-24 year olds killed in EU traffic (over 10,000 in 1998) die in the first year after obtaining a driving licence, the EU should create a licensing system adapted to their needs and vulnerabilities.

Recommendations

- The EU should create an EU graduated and /or multiphased licensing system to reduce the risk of young novice drivers.
- The EU should study the safety benefit to be derived from electronic driving license (EDL) (to prevent unauthorised or unqualified persons from operating a vehicle).

1. 3 Mandating the use of crash helmets for users of motorised two-wheelers

Research shows that the use of crash helmet reduces the incidence of fatal head injuries by 50%. Eighty per cent of the two-wheeled vehicle users killed annually sustain fatal head injuries. Despite recognising their high injury risk, the European Commission intends only *to promote* the use of crash helmets by all two-wheel motor vehicle users. In view of the saving potential of mandatory crash helmets (Saving estimate: around 1,000 lives annually), ETSC believes that this is a missed opportunity for developing a directive.

Recommendation

- The EU should require mandatory crash helmet use by motorcycle and moped riders.

2. Improving vehicle technology

Passive measures, with the support of the EuroNCAP programme, have still a large potential for safety benefits in the short to medium term. Some measures are long-overdue. There are also active safety measures, ready for implementation, which have already proven benefits.

2.1 Making the vehicle safer through passive safety measures

Most injuries result from collisions involving cars. While car users comprise the greatest proportion of overall road deaths (57%), the risk of death on EU roads is substantially higher for vulnerable road users – some 8-9 times higher for pedestrians and cyclists.

Action where the EU has exclusive responsibility, such as Single Market vehicle standards legislation, is of particular importance. Vehicle engineering improvements for safety can either be achieved by modifying the vehicle to help the driver avoid accidents "active safety" or by providing protection against injury in the event of a crash "passive safety". A recent study in one EU Member State reviewed the effectiveness of casualty reduction measures nationally between the early 1980s and the mid-1990s and demonstrated that the greatest reduction was from vehicle crash protection (15%) compared to drink/drive measures (11%) and road safety engineering measures (6.5%)[11]. Reducing injury risk in accidents remains a priority and one of the key ways of achieving this is by improving the vehicle crash protection.

Recommendations

- The EU should require implementation of the state-of-the art EEVC pedestrian crash tests leading to safer car fronts for pedestrian and cyclists (saving estimate: up to 2,000 lives annually). The current Directive does not guarantee their certain implementation.
- The EU should improve the front and side impact crash testing legislation, supported by European New Car Assessment Programmed testing (Saving estimate: at least 2,500 lives annually).
- The EU should mandate a side impact test procedure to assess child restraints for all age groups of children.
- The EU should require the fitting of ISOFIX child restraint anchorages, with provision for an effective third restraint in the front and rear seats.

2.2 EuroNCAP: stronger integration of the safety of pedestrians and children

The European New Car Assessment Programme (EuroNCAP), which aims at testing and publishing new car safety against harmonised testing protocols, was introduced to complement the EU type-approval system. This programme aims to develop consumer awareness concerning the safety performance of new cars in various test conditions which are representative of severe injury producing impacts and has made Europe a leading market for safety.

ETSC welcomes the continued support of the European Commission for the EuroNCAP programme but stresses the need for the Commission to ensure that the test results take

[11] Broughton, J, Allsop, R.E., Lynam, D.A and McMahon, C.M (2000). The numerical context for setting national casualty reduction targets; TRL report 382. TRL Ldt, Crowthorne, UK.

into account the overall safety of cars. In other words, an independent consumer information programme should not attribute 5 stars to a car which performed poorly in pedestrian protection and does not provide efficient child restraint system.

Recommendations

- The EU should actively encourage EuroNCAP to combine pedestrian and child restraint performance with occupant ratings.

2.3 Implementing active safety measures that are ready to go

ETSC would like to see the implementation of new technologies which have proven safety benefits and are already ready to go, such as black boxes in cars for accident research purposes, effective seat belt reminders or daytime running lights.

Accident prevention through improved vehicle conspicuity and visibility for drivers vision is one of the main safety features, which hold immediate promise. For example, the benefits for motorcycles, mopeds and car occupants of the fitment and use of daytime running lights are large and could save many lives annually.

Audible seat belt warning devices could make a very cost-effective contribution in the short term to encouraging safe behaviour. They are intelligent devices which detect whether seat belts are in use and if not, give out increasingly aggressive warning signals until the belt is used. Studies from Sweden and Australia have shown that by installing audible and visual seat belt reminder systems, belt use could be increased to at least 95%. Again the Commission recognizes their safety benefits for the EU as whole if fitted universally but intends only to *promote their use by voluntary agreement*.

New active safety systems or intelligent transport applications such as speed control systems and driver impairment detection systems such as alcohol interlock have, in the long term, larger potential and need to be further researched. However, the forthcoming Communication of the European Commission on Intelligent Vehicle Technology cannot be seen as a great help in reaching the target because the effects of the implementation of new technology will be seen only in the longer term. New technologies are not going to help to meet the 2010 target. For example, it is unrealistic to expect all cars to be fitted by 2010 with effective measures such as intelligent speed adaptation devices.

Recommendations

- The EU should require the fitting of effective seat belt reminder systems in cars.
- The EU should mandate the fitment of daytime running lights to motorcycles, mopeds and to cars.
- The EU should develop a common specification for intelligent speed adaptation (ISA) and demonstrate its public acceptability.

3. Promoting best practices guidelines for more forgiving infrastructures

ETSC welcomes the emphasis which the European Commission puts on best practises guidelines in the field of infrastructure. Road accidents generally either occur in clusters at single sites or along sections of road, or are scattered across whole neighbourhoods. Road safety engineering and related procedures can make a large contribution to reducing the frequency and severity of road traffic accidents.

ETSC welcomes the intention of the European Commission to promote best practice in road safety work by establishing a framework of best practice guidelines for the voluntary use of safety professionals. ETSC believes that the fields for developing those guidelines have been well identified by the European Commission. ETSC also strongly supports the need to further draw up best practices guidelines and stress the need to prioritise the actions under the guidelines.

ETSC would also like to see EU funding conditional on best practice standards being met. When new transport projects are proposed, safety impact assessments need to be carried out to ensure that the proposals do not have an adverse safety impact on the local road environment. Road safety audits then need to be carried out to provide independent safety checks of the design at various stages between feasibility study and actual traffic operation. This is because compliance with design standards has been found not to be sufficient to avoid the unintentional building in of avoidable risk.

Recommendations

- The EU should develop and facilitate the exchange of EU best practice guidelines in the fields of urban safety management, speed reduction, low cost measures and safety audit.
- The EU should require safety audits and safety impact assessments for EU-funded infrastructure. An EU methodology needs to be established for safety impact assessment.

4. Curbing driving fatigue of professional drivers

Given that around 18% of road deaths across the EU involve commercial road transport vehicles, reducing fatigue among their drivers may well have a part to play in reaching the EU target. The current driving time proposal (and the lack of any formal interface with the Working Time Directive) still allows an 80-hour working week.

The European Commission has proposed recently a new Regulation on driving time in commercial road transport, which is being examined by the European Parliament and the Council of Ministers. The current Regulation permits daily averages of 13 hours or more for some working weeks, whereas accident risk data demonstrate that after an 11 hour work span the risk of being involved in an accident doubles.

ETSC urges the European Institutions in their amendments to the draft Regulation to curb driving fatigue associated with excessive working hours. The Commission should also investigate the incidence of excessive hours of car driving in the course of work

Recommendation

- Effective harmonization of driving/working times in road transport to reduce the effects of cumulative fatigue.
- Investigation of the incidence of excessive hours of car driving in the course of work.

5. Accident data collection, analysis and dissemination by the European Road Safety Observatory

ETSC welcomes the establishment of a European methodology for independent road accident investigations. Effective accident and incident investigation makes a positive, and long lasting, contribution to the improvement of transport safety[12]. ETSC believes that an EU road accident investigation strategy should be developed with new, systematic, in-depth injury and accident causation data systems based on appropriate samples of accidents, and that all accidents investigation reports should be made public without restriction.

ETSC also encourages the Commission in its wish to further develop the CARE database and calls for access to this database by researchers outside government at marginal cost.

ETSC also welcomes the intention of the European Commission to set up a European Road Safety Observatory. However, it is already clear that this would need to be a publicly-funded non-regulatory and independent organisation (at least independent of the regulating Directorates) which could help to speed up developments in road safety and provide a good catalyst for road safety information and data collection, and encourage best practice across the EU.

Recommendations

- The EU should ensure that the lessons learned from accident investigation and the resulting safety recommendations are made public and shared freely between Member States through accessible;centralised European databases.
- The European Commission should ensure that the European Road Safety Observatory accommodates and opens up access to the CARE Database.

[12] ETSC (2001) Transport accident and incident investigation in the European Union.

6. European Charter for Road Safety

ETSC welcomes the European Charter for Road Safety and thinks that it is an innovative tool for improving road safety, which could prove very useful and effective under certain conditions. The Charter is a good opportunity to provide a catalyst for actions which go beyond legislation. ETSC supports the principles and measures listed in the Charter. However, ETSC also believes that the Charter should be strengthened. ETSC would like to see a strict follow-up of co-signatories' commitments. What each co-signatory has actually been doing and how it has performed should be evaluated by the European Commission and made public.

ETSC agrees with the European Commission and believes that local and regional authorities should especially be encouraged to co-sign the Charter in addition to NGOs and companies.

Recommendations

- The European Commission should especially encourage local and regional authorities to sign the Charter.
- The European Commission should strictly follow-up the performance of each co-signatory of the Charter.
- The European Commission should specify how they will control the performance of the co-signatories of the Charter and what it will do if the commitment is not respected).

CONCLUSION

ETSC strongly welcomes the 3rd Road Safety Action Programme. It provides a good opportunity to reduce the unacceptable number of 39,000 road deaths on European roads every year. The EU target of halving road deaths by 2010 (20,000 deaths), though very ambitious, is a clear political signal that the EU will shoulder its responsibilities in delivering a safer transport system.

ETSC strongly supports the European Commission in bringing forward the road safety actions foreseen in the 3rd RSAP. But ETSC also believes that these actions should be prioritised. ETSC would like to see a ***ranking actions document*** and a ***roadmap for actions***, which would tell citizens how the Commission is going to meet its ambitious target. The EU should identify the route to achievement of its target, the respective roles of the EU and its Member States in doing so, and how the EU can help the Member States to deliver their respective contributions.

ETSC reiterates the need to prioritise actions as well as clearly estimate how many lives could be saved by particular measures. ETSC expects from a long-term action plan that safety measures are targeted where relatively large gains can be made. The European Commission cannot adopt an ambitious quantitative target of reducing EU road deaths and at the same time fail to set out the savings philosophy. The savings estimate of a particular measure is also a key parameter to judge the cost-effectiveness of that safety measure, and thus identify those measures that could provide high safety benefits in return of low costs and affordable implementation.