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IRU Position on the EU Commission Road Safety Strategic Action Plan and on the proposal to revise the EU General Safety Regulation

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I. ANALYSIS

The EU Commission adopted on 17 May 2018 a new Strategic Road Safety Action Plan, which was accompanied by a number of proposals, including a revision to the EU General Safety Regulation on type approval requirements for motor vehicles and their trailers. The revision aims at improving vehicle and vulnerable road user safety. The Strategic Action Plan announces the publication in 2019, of a new EU road safety policy framework 2021-2030 and a number of measures for infrastructure, road users and vehicles, that will still be taken up to 2021.

Road safety is a top priority issue for the road freight and passenger transport sector, because every accident is one accident too many. In fact, IRU is a signatory to the EU Charter on Road Safety and is committed to ensuring the road safety of road users, vehicles and infrastructure.

In 2005, IRU undertook The European Truck Accident Causation Study (ETAC) which was co-financed by the EU Commission. Its main conclusion was that human error is the main cause of 85% of road accidents involving heavy commercial vehicles, but 75% of these are caused by other road users.

In 2013, IRU published a [bus and coach road safety handbook](#), intended for bus and coach company managers and their drivers. The objective of the handbook is to maintain and further improve the bus and coach sector's excellent safety record.

1. The EU Strategic Action Plan on Road Safety

It is important that the EU Commission and Member States pursue the research initiated by ETAC, using the methodology it established, to ascertain the best solutions to reduce accidents involving road freight transport vehicles.

IRU welcomes the EU Commission's wishes to extend the scope of deployment for active vehicle safety technology. However, IRU notes that as a matter of operational practice retro-fitting a heavy-duty vehicle (HGV: truck, bus or coach) is much less cost-efficient than it is to buy a new HDV already equipped with Advanced Driver Assistance Systems (ADAS) technology. The operator purchasing a new vehicle will benefit from the ADAS technology throughout the 8-10 years life cycle of the vehicle. Estimating cost-benefits from ADAS technology is significantly different with regard to older-model vehicles that require retro-fitting. Because the new technology has to be bought in for a used HDV, this lowers cost-efficiency.

One must also consider that additional costs are borne by the operator because of the potential structural design alterations needed to an older-model vehicle in order to undergo an ADAS retro-fit. IRU acknowledges that the EU Commission continues to work on improving knowledge transfer and training. ETAC recommendations stress the crucial factors of training and awareness raising of professional drivers, car and other road users, including on how to interact with heavy commercial vehicles. In this respect, it is essential to further develop and promote training and provide training institutes with the necessary training programmes and modules, as done by the IRU Academy and training institutes of IRU Member Associations, in order to effectively target the main cause of all accidents and can significantly decrease their frequency.

The EU Commission also aims to evaluate the potential extension of eCall to HDVs. IRU has already made substantial contributions to eCall deployment of HDVs through the EU-funded [HeERO project](#). A strong potential added-value for road safety exists with regard to this technology, notably through the communication of cargo related information to the rescue services.

Effectiveness of road safety policies largely depends on enforcement. Despite increased efforts by the EU Commission and by Member State control authorities', enforcement entails a heavy administrative burden, especially for infringements committed abroad. There is also a lack of information on the rules applicable in the different Member States. Slow penetration of reliable digital and electronic solutions also hampers efforts to make enforcement more intelligence-led.

2. The EU Commission proposal to revise the General Safety Regulation

IRU notes that the EU Commission's Impact Assessment accompanying this package of legislative and non-legislative initiatives has been challenged in several ways, especially when it comes to the coherence with the proposal on infrastructure safety management. Questions have been raised about consistency between the identification of the main issues, such as stagnation in the reduction of road fatalities; the reasons behind the issues; the new objectives set forward and ways to achieve those. Transparent cost-benefit analysis has also been identified as an issue.

a) Cabin design

The EU Commission foresees new rules relating to cabin design to enhance direct visibility of vulnerable road users from the driver seat. It should be noted that the recent IRU Report on the Commercial Vehicle of the Future stresses that a change of cabin design does not necessarily have a direct impact on improved road safety in all situations. The impact of cabin design depends on the type of operations for which the vehicle is used. The improved cabin design typically has a positive impact in urban and sub-urban areas when the vehicle drives at lower speeds.

When it comes to regional delivery and long-distance operations on main roads and motorways, additional elements to road safety such as aerodynamic performance and fuel efficiency, should also be considered. Therefore, when approaching cabin redesign, it is important to consider the actual impact of the measure on road safety as well as to consider the potential impacts of the redesign on fuel efficiency and overall aerodynamic performance.

b) Advanced systems to better detect vulnerable road users

The EU Commission foresees that certain categories of vehicles (M2, M3, N2 and N3) should be equipped with advanced systems to help detect vulnerable road users in front of or nearby the vehicle. Accidents shall be avoided through a warning signal. Such technology can be helpful in protecting vulnerable road users, but the proposal lacks precision on the scope of systems which could be used.

c) Accessibility for mobility impaired people on buses and coaches

The EU Commission foresees that certain categories of buses (M2, M3, Class 1) that are constructed with areas for standing passengers and have a capacity exceeding 22 passengers, should be designed to improve the accessibility for mobility-impaired people, such as wheelchairs users. IRU would like to stress that similar legislation is

already in place at UN level (UNECE regulation number 107 on the uniform provisions concerning the approval of category M2 or M3 vehicles with regard to their general construction, point 5.2.) and that legal duplications should be avoided in order to keep the legislative framework as lean and as understandable for the carrier industry as possible.

d) Platooning

The EU Commission aims to be empowered to adopt delegated acts to establish a harmonised format for the exchange of data, in compliance with EU legislation on data protection, for the exchange of data for the purposes of multi-brand vehicle platooning, in compliance with EU legislation on data protection. IRU notes that truck platooning is a step towards the eventual deployment of fully autonomous vehicles and that a wide variety of aspects issues, such as harmonising data formats, will have need to be addressed in order to ensure a successful outcome.

II. IRU POSITION

IRU and its Member Associations support any measure that will effectively increase road safety. IRU welcomes the EU Road Safety Action Plan 2021-2030 which is in line with the road transport industry commitment to road safety.

In particular, IRU,

- Urges the EU Commission to pursue further research initiated by the ETAC study, in order to ascertain which solutions can best reduce accidents involving commercial vehicles.
- Recommends that the further deployment of active vehicle safety technology, including potentially via the retrofitting of the existing fleet, remains cost-effective and is accompanied by financial support measures.
- Encourages EU Member States to further align their enforcement of rules related to road safety and in particular provide transparent information about the rules in force for commercial and passenger transport vehicles as well as further reducing administrative burden through a more rapid deployment of electronic and digital solutions.
- Recommends that all vehicles, systems, components, etc. ordered by transport operators before the date of application of the General Safety Regulation or its delegated acts are not impacted by their provisions.
- Supports the IRU Academy and IRU Member training organisations that strive to constantly improve training standards and facilitate knowledge transfer through a network of accredited training institutes throughout Europe.
- Encourages the EU Commission and Member States to cooperate closer with the road transport sector to raise awareness of car and other road users on how to interact with buses, coaches and trucks.
- Supports efforts to redesign cabins with the aim to improve visibility, but calls on the EU Commission to align any initiative with the aerodynamics and fuel efficiency features of the vehicle when developing a proposal for a delegated act.
- Supports improved accessibility of M2 and M3 Class 1 buses for mobility impaired people provided that the EU rules are fully compatible with the existing UNECE Regulation 107.
- Embraces innovation related to truck platooning and is in favour of a transition which allows for the **safe, secure and sustainable (3 “s” strategy)** operation of autonomous vehicles meaning that technical standards to operate autonomous vehicles need to be harmonised and interoperable. Technology must be proven and solid to ensure functioning in various climates and traffic conditions.

IRU is committed to continue working with the EU Institutions, Member State governments and control authorities to implement the various initiatives proposed by the EU Commission.

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