



Future Road Safety in the EU At Stake?

ETSC Response to the EC Communication

**“Towards a European Road Safety Area:
Policy Orientations on Road Safety 2011-2020”**

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Introduction

ETSC welcomes the new EC Communication entitled “Towards a European Road Safety Area: policy orientations on road safety 2011-2020” particularly the new target set to reduce road deaths by a further 50% by 2020. In this response in Part 1 ETSC looks at the overall structure of the Communication and then in Part 2 analyses in detail the different measures presented for action by the European Commission for the next decade. ETSC suggests areas for improvement and addition also with the aim of setting strong EU wide actions that will match the ambitions of the new target for 2020.

Part 1

1.1. Road Safety Target Setting to 2020

The European Commission adopted a Communication entitled “Towards a European Road Safety Area: policy orientations on road safety 2011-2020” on the 20th of July 2010. ETSC welcomes the adoption of a new EU target to reduce road deaths by 50% by 2020. Targets motivate stakeholders to act and help those responsible for the road transport system to be accountable for achieving defined results. A shared target at European level helps each Member State to see that its road safety improvements are contributing to addressing a Europe-wide problem. The adoption of the EU target in 2001 gave a boost to the combined efforts at national and EU level. As a result, reductions in the number of deaths have been much steeper in 2001-2009 than in preceding decades.

Road deaths decreased by 36% in the EU27 between 2001 and 2009. The EU15 alone, for whom the EU's 2010 target was originally set, has achieved an impressive 42%. In the last two years, Member States that joined the EU in 2004 (EU10) have improved their road safety level substantially for most of them, impressively for some. In an international comparison, road deaths have decreased by 42% also in Japan, but by only 20% in the USA and 13% in Australia since 2001. The Commission forecast foresees 33,000 deaths in 2010. If the 2020 target is achieved still 16,500 would die in a year, but that would make Europe a safer place to live than at present. However, in order to achieve the 50% reduction target in 2020 the EU will inevitably have to go above and beyond current reduction trends. If the EU is serious about reaching its 2020 target, the EC Programme needs to be reinforced and translated urgently into determined action.

ETSC congratulates the European Commission for the new emphasis on serious injuries but regrets that the adoption of a target for serious injuries is delayed until a common definition is adopted. The swift adoption of a detailed roadmap is needed, in its absence this may result in the situation in which slower Member States hold back those already prepared to work with a standardised definition. As this process is bound to take time, an interim target should be set in terms of countries' existing definitions of serious injury.

1.2. What's in a Name?

Although the document "Towards a European Road Safety Area: policy orientations on road safety 2011-2020" includes some elements of an Action Programme, its scope, structure and name are very different from the three previous European Road Safety Action Programmes. As said previously, ETSC welcomes the adoption of a new EU target to reduce road deaths by 50% by 2020. The goal is ambitious but the decision of the European Commission to adopt "Policy Orientations" with a weak set of objectives and actions instead of a new far reaching European Road Safety Action Programme calls seriously into question the chances of reaching the target. The road safety community had hoped for a new EU 10-year Action Programme providing a vision, priorities and a detailed road map against which performance could be measured and delivery made accountable. The adopted Communication falls short of these expectations.

1.3. Vision for Road Safety in the EU

Every far reaching successful programme needs a vision or philosophy. A vision can be regarded as a leverage point to generate and motivate change. The vision or philosophy needs to be far-reaching and long term; looking well beyond what is immediately achievable (ETSC 2006). The European Commission in its Communication states that:

"Road Safety policy has to put citizens at the heart of its action: it has to encourage them to take primary responsibility for their safety and the safety of others. The Road Safety Policy aims at raising the level of road safety, ensuring safe and clean mobility for citizens everywhere in Europe."

It is unclear if this is considered as a vision: it is not defined as such, just as "principles" to "strive for the highest road safety standards throughout Europe". In terms of what the text says, ETSC recognises the important responsibilities of road users but believes that it is just as important for the traffic system to be adapted to their needs, errors and vulnerability. Putting the citizen at the heart of the action should not mean moving responsibilities from authorities to citizens, but emphasising the human role as a measure of EU policy actions. The risks we run in using Europe's roads are much greater than with any other mode of transport or indeed the risks in almost all industries. We should ultimately aim to reduce the risks we face in traffic to the levels of risk in these other everyday activities. ETSC proposes this vision for the EU:

"Every citizen has a fundamental right to, and responsibility for, road traffic safety. This right and responsibility serves to protect citizens from the loss of life and health caused by road traffic."

This was advocated in ETSC's Blueprint "Road Safety as Right and Responsibility for all" (ETSC 2008). This requires that we redefine our commitment and the resources we provide to fulfil what is a human right of an acceptably safe transport system. This right was adopted in the Tylösand Declaration at the annual Swedish conference on Traffic Safety in

2007¹. ETSC has adapted it also to include the responsibility element more strongly. As for such a vision to work it should also reflect the need to act according to these responsibilities as well as expecting the rights of individual road users to be accepted (Tylösand Declaration 2007).

ETSC Recommendation to the EC

- In its dissemination of the Communication the European Commission should clarify that this part of the Communication is a vision which will aim to motivate actors to achieve the new 2020 target. It should gather different players together and endorse this new vision with them and thus increase its validity and its realisation.

1.4. “Road Safety Policy Orientations” and Transport White Paper

Following a consultation period last year the European Commission is looking further ahead and defining a vision for the future of transport and mobility, preparing the ground for future policy developments with a ten year perspective up to 2020. As the European Commission prepares its next White Paper on Transport, it should consider the need to include a strong section in the White Paper on road safety reiterating there the new 2020 target to reduce road deaths by 50%. The Communication on Road Safety Policy Orientations and the White Paper should be mutually supporting.

ETSC Recommendation to the EC

- The EC should include a strong section in the White Paper dedicated to road safety. It should also ensure that the two documents are linked.

1.5. Memo Road Safety Programme 2011-2020

The titles of the EC Communication and of the accompanying Memo (Memo/10/343 and EC Communication) are inconsistent in that the Memo clearly speaks of a “Road Safety Programme”. Moreover, the objectives included are not listed in the same order as in the EC Communication. Finally, some measures are listed in the Memo and do not appear in the EC Communication and vice versa.

Another general point concerning structure is that the EC Communication outlines two areas where strategies will be developed in due course but no indication is given what the timetable will be for this. These include a “common road safety enforcement strategy” and a “global strategy of action on road injuries and first aid”. Furthermore, the implementation of these policy orientations foresees the development of national road safety plans by Member States including also timetables for their implementation. It is regrettable that, even at this stage, the European Commission does not apply the same standards to its own strategies.

¹ Tylösand Declaration (2007) Tylösand, Sweden.

ETSC Recommendation to the EC

- The European Commission should clarify the link between the Memo and the EC Communication and the timescale envisaged for development of its own strategies.

1.6. Integration of Road Safety into other Policy Areas

Integration with other policy areas is mentioned at the start of the text but not followed through. In its Blueprint ETSC suggested that the EU could adopt a strategy to achieve a stringent integration of road safety in all policies that have an impact on road users' risk levels including, for example, employment, enterprise, environment and youth policy. Institutionalisation of road safety across different sectors would mean more effective synergy of actions, more political leadership and higher visibility in the media (ETSC 2008) as is the case for environmental issues which are integrated into all policy areas (the so-called Cardiff process).

1.7. The EU's Role to Legislate: Treaty on the Functioning of the EU

While priorities are defined in the EC Communication through an encompassing set of objectives, the bold statement that *"with over a dozen legislative instruments on road safety, the EU acquis are essentially in place"* reveals a disturbing complacency about the legislative foundation for action for the next decade. The European Commission states that it *"intends to give priority to monitoring the full and correct implementation of the EU road safety acquis by Member States"*. However, in its conclusion, the Communication states that *"the role of the Commission will be to make proposals on matters where the EU is competent"*. ETSC would argue that there is a great deal that must still be done in the next decade in the field of EU legislation to improve road safety. Although it is important to stress that the subsidiarity principle can be used as a tool for facilitating co-operation with Member States to develop EU legislation. However, subsidiarity should not be viewed as a reason for legislative inaction at EU level². Especially since, the European Court of Justice's approach has always been very prudent. The Court has never reviewed a Community legislative norm on grounds of subsidiarity unless a manifest error had been committed.

The Treaty of the Functioning of the European Union (2009) states that the EU has a competency to adopt legislation to improve transport safety and that this is only limited by subsidiarity. However, the gross inequalities between European regions and Member States in terms of road safety illustrate one principal axiom of contemporary transport

² For example in the current case of the proposed Cross Border Enforcement Directive, whilst it may be that the Community has developed an *acquis* in the transport policy field, road safety provisions will only have their desired effects if enforcement is guaranteed throughout the whole Union: it is therefore absolutely crucial to ensure the observance of the existing national legislation but this might not yet be enough. To guarantee equal treatment amongst Member States a Cross Border Enforcement Directive is paramount.

safety policies: local, regional and national governments *alone* are not able to provide for a policy framework that ensures both the highest practicable level of safety and a fair distribution of safety across the European Union (ETSC 2003).

The Treaty of Amsterdam, acknowledged this Community competence to take measures to promote transport safety (Article 71 of the EU Treaty). This has been strengthened under the Treaty on the Functioning of the European Union (2009) where the link to pursuit of the Common Transport Policy (Article 90) presents an important nuance. In the new Treaty Article 91c has been set apart as a separate detached item confirming that transport safety is a separate field for legislation within the Common Transport Policy. Moreover ETSC would also stress that the European Commission should continue, as it has done in the past, to adopt legislation using other Treaty Articles which can have a secondary aim to improve transport safety. These include for example implementing the internal market and Vehicle Type Approval. Clearly, road safety is an area for EU legislation and legislation in road safety has an added value for all Member States.

1.8. What do People Expect?

Public opinion on road safety issues is important in informing decision makers as regards to the support of the EU citizens for the introduction of new measures and the performance of existing policies. Although clearly sometimes decision makers may need to take decisions which are not popular amongst citizens and science must always be the core basis of any new action. The results of the recent Eurobarometer³ show that Europeans not only recognise the danger of main risky behaviours in road traffic but also expect more policy actions to address them. The majority of citizens polled would like to see more action on drink driving and speeding. However, these key concerns are not reflected in the priority measures chosen by the European Commission.

Surprisingly, the Eurobarometer asks “What can Member States do about this?” and does not ask where the EU can add value and act to improve road safety in Europe. Thus the manner in which the question is phrased already frames the answers given by the polled citizens.

Perceptions about the seriousness of road safety problems

- People driving under the influence of alcohol are considered to be a *major* safety problem by 94% of the polled EU citizens, followed by drivers exceeding speed limits (78%) and drivers/passengers not wearing seatbelts (74%).
- 76% of EU citizens think that people driving while talking on a mobile phone without a hands-free kit constitute a major safety problem in their country.

Measures that national governments should focus on to improve road safety

³ http://ec.europa.eu/public_opinion/flash/fl_301_en.pdf

- A slim majority of EU citizens (52%) thinks that road infrastructure safety should be improved as either a first or second priority.
- 42% believes that enforcement of traffic laws should be improved as either a first or second priority for their government. Dealing equally forcefully with resident and foreign traffic offenders is selected by 36% of EU citizens as a measure that should be prioritised by government authorities.
- A smaller percentage of respondents (30%) is of the opinion that their national government should initiate more road safety awareness campaigns as a priority action. And only 26% hold the view that their government ought to assign priority to the introduction of periodic driver re-training schemes.

Whilst the majority of Europeans perceive the infrastructure and enforcement to be the most important fields of actions, only a minority of Europeans lists among the priorities actions on awareness campaigns or driver re-training.

ETSC Recommendation to the EC

- Recognise that measures dealing with enforcement of drink driving, speed and seat belts enjoy a high level of public support and set priorities accordingly.

1.9. Assessment of the impact of the Third Road Safety Action Programme: Lessons Learnt

The 3rd Road Safety Action Programme covered three fields of action: road user behaviour, passive and active vehicle safety and management of road infrastructure safety. According to an evaluation of the Action Programme 17 of the 62 measures (approximately 27% of the measures) have been implemented during the time of the 3rd RSAP⁴. Although only less than 30% of the actions evaluated were seen to be as completed, important lessons have been learnt from the 3rd RSAP. First, a number of important pieces of legislation were adopted in the past decade. In the view of ETSC these include:

- Adopting the framework Directive 2008/96/EC on Infrastructure Safety
- Amending the Driving Licence Directive
- Adopting an existing UNECE regulation to include seat belt reminders for the driver seat and not yet to front and rear passengers. This should be extended to all seats in the next decade.
- Adopting the Pedestrian Protection Regulation 2009/78 to reduce severity of accidents involving pedestrians and cyclists.
- Introducing Daytime Running Lights under Commission Directive 2008/89 on new motor vehicles.
- Adopting Directive 2007/38 on retrofitting Blind Spot Mirrors to HGVs.
- Adopting Tunnel Safety Directive 2004/54/EC.
- Adopting Directive 2003/59/EC on the Training of commercial drivers

⁴http://www.tmleuven.be/project/ersap/2010_road_safety_finalreport_volume1.pdf

- Adopting tighter legislation on enforcement of driving and rest periods for commercial road haulage (Regulation EC 561/2006).
- Extending the mandatory use of seat belt wearing to coaches and heavy goods vehicles (Directive 2003/20/EC).
- Making the first efforts in the form of an EC Recommendation on enforcement and proposing a Directive on the cross border enforcement of traffic law.
- Adopting the General Vehicle Safety Regulation 2009/661/EC

One of the most important lessons learnt from the 3rd RSAP is that, if more legislation and actions had been translated into action, then possibly even more lives would have been saved in the past decade. Prioritising measures and actions and focussing on those with the most potential for saving lives is crucial and was not fully achieved in the past decade. Although in many cases Member States contributed to weakening or even blocked legislative proposals made by the European Commission, this should not result in a European Commission that is hesitant to take up some strong new legislative measures for the decade to come.

In terms of numbers of measures it is a great pity that less than 30% of identified measures under the 3rd Road Safety Action Plan have been implemented. However, to scale down the next RSAP into mere “policy orientations” with far fewer concrete objectives is disappointing to ETSC. Some of the other two thirds of measures not fully implemented in the 3rd RSAP should now reappear in the Communication also to allow for greater accountability for both the European Commission and Member States. Under concrete actions included in the new EC Communication ETSC identifies only four commitments to new proposals for legislation; of these at least two are left over from the past RSAP as unfinished business and another two have been on the policy agenda for the past 18 months as due for adoption. Reducing the ambitions of the EC so much should not be blamed on an overly ambitious 3rd RSAP. A balance must be found between ambition and pragmatism through prioritising a number of effective measures that address the actions that are likely to save the most lives.

ETSC’s response to the 3rd RSAP (ETSC, 2003) highlighted the 3rd RSAP’s failure to introduce a time scale for actions and milestones to measure progress and show the road to a successful implementation. Despite a Mid Term Review of the 3rd RSAP in 2006, these important elements of implementation and monitoring of the 3rd RSAP were not added. Moreover, the Evaluation report of 3rd RSAP mentions that the ERSAP 2011-2020 should contain a mid-term evaluation.

ETSC Recommendations to the EC

- Be ambitious in the introduction of demonstrably effective measures.
- Use the competency to act on road safety and address systematically the most important road safety problems.
- Add monitoring and evaluation including a mid-term review to the processes foreseen in the Communication for 2011-2020.

1.10. Indicators and Benchmarking

ETSC strongly believes in indicators, based on the attained level of attributes leading to a desired final outcome. To enable the achievement of such an ambitious target as 50% reduction in road deaths, the Commission would need to create a monitoring framework that includes a set of sub-targets and indicators. A common set of performance indicators would be essential, together with a well-functioning Road Safety Observatory.

Under point 5.2 the EC identifies common tools for monitoring and evaluating road safety policies. Every country involved in the delivery of the safe road transport system needs to compare itself on an international level - the national level is no longer enough. The EU provides the ideal space for Member States to compare themselves to each other (shared target, cohesion objectives, freedom of movement).

Monitoring EU countries' policies in relevant areas helps national policymakers to identify fields in which better progress is possible. The EU is already collecting data on accident outcomes and accident circumstances within the CARE database. However, monitoring countries' performance only on the basis of collision outcomes is not enough. The EU should encourage Member States to monitor normal traffic through a set of performance indicators and make use of the results of the EU funded research project SafetyNet. Safety Performance Indicators allow actions to be targeted in key areas systematically and implementation of measures to be monitored. This is why ETSC has been running the Road Safety Performance Index (Road Safety PIN) since 2006. The PIN Programme helps to identify best practice and create positive competition between countries to deliver a safer road transport system. It helps to build up the kind of political leadership that is needed to achieve lasting improvement in road safety.

ETSC Recommendations to the EC

- Build on the CARE database, improve the accessibility of the various data collected and make them available as soon as possible.
- Support countries in setting up data collection and evaluation procedures and stimulate the use of harmonised protocols for accident, exposure and performance indicators using SafetyNet recommendations.
- Collect consistent and reliable exposure data.
- Monitor Member States' performance against the set of safety performance indicators developed by SafetyNet and publish annual reports including mean speeds, use of seat belts in front and rear seats, use of helmets and use of child restraint systems and drink driving.
- Use the evidence gathered to devise and update relevant policies.
- Encourage Member States to set quantitative targets based on compliance indicators.

- Implement the recommendations of the EU funded research project DaCoTA on in-depth accident investigations and build the capacity for an EU common in-depth accident investigation database.
- Secure funding for road safety surveys such as SARTRE to study opinions and reported behaviours of car drivers throughout Europe overtime.

Part 2

This part will discuss in sections 2.1-2.7 the seven headline objectives and proposed actions from the European Commission and present ETSC views on them. The Commission has identified some of the most pressing road safety problems and has come up with proposals on how to treat them in seven areas. The areas picked up correspond to some of the key topics highlighted during the consultation period. ETSC will respond to each of the objectives and endeavour to include items which have been missed and are relevant in its view. At the same time, some areas were not included at all, in particular some where the road safety burden is likely to grow in the coming decade (distraction, fitness to drive, safety at work) and ETSC views on these are presented in Section 2.8. The recommendations contain a number of self-explanatory ones as well as ones that are explained in the preceding text.

2.1. Objective 1: Improve education and training of road users

The Commission identifies the need to improve the quality of the licensing and training systems, with a focus on young novice drivers. In particular, it proposes to develop a common educational and training road safety strategy. Such a strategy should introduce a common age for starting to drive or ride. ETSC welcomes this as one of the objectives but stresses that these priorities should not lead the EC to neglect other important measures to achieve safe behaviour.

ETSC welcomes action on young drivers. Traffic collisions are indeed the single largest killer of 15-24 year olds (ERSO, 2006b). The highest risk circumstances of young drivers – in particular male drivers – are associated with speeding, drink driving, non-wearing of seat belts and drug driving and these also affect drivers in other age groups. Focussing on implementing road safety measures to reduce deaths among young drivers such as, for example, speed awareness training will also reduce collisions among all drivers.

ETSC also welcomes efforts to reinforce key elements of eco-driving within the curricula of the theoretical and practical tests. This goes some way to recognising the casualty reducing benefits of managing driving speeds.

ETSC Recommendation to the EC

- Develop minimum standards for driver training and traffic safety education with a view towards a gradual alignment in the form, content and outcomes of driving courses across the EU.
- Encourage EU Member States to develop road safety education that starts at school (with for example one hour minimum a week) and be part of a continuum of life-long learning.

- Introduce Graduated Driver Licensing systems or otherwise address the high risks faced by new drivers thus allowing them to gain initial driving experience under lower-risk conditions between gaining the learner permit and full licence status.
- Include peer passengers during the training period to expose learner drivers to the impact of distraction from passengers on their concentration.
- Arrange for demerit point systems to make novice drivers subject to punitive (e.g. loss of licence) or rehabilitative (e.g. mandatory traffic risk awareness training) measures at lower levels of offending than apply to more experienced drivers.

2.2. Objective 2: Increase Enforcement of Road Rules

This objective is one with the most concrete and detailed actions in the “Policy Orientations”. Other Member States can benefit from the experience of fast progressing countries that have proved that effective enforcement leads to a rapid reduction in deaths and injuries. Although the Commission states that it “will work towards developing a common road safety enforcement strategy”, then it only details speed limiters in light vans, alcohol interlocks and the establishment of national implementation plans under this broader plan for concrete action. There seems to be scope for reanalysis of what the objectives of the concrete strategy will be on enforcement and which measures the Commission can take to reach them.

2.2.1. Cross Border Enforcement Directive

Firstly, the EC states the need to continue with the work of the Cross Border Enforcement Directive and reach an agreement with the Council and the European Parliament. ETSC is pleased to see the Commission’s renewed engagement on the Cross Border Enforcement Directive placed back on the Council agenda by the Belgian EU Presidency (ETSC 2010). It is important to persevere in finding an agreement in favour of this piece of unfinished business from the last Action Programme. In accordance with the proposal being discussed ETSC supports the incorporation of best enforcement practices into the legislative proposal as provided for by a European Parliament amendment for a new Article 3. This would significantly strengthen the current proposal and lead to a more substantial contribution to reducing the 35,000 annual deaths on Europe’s roads.

2.2.2. Enforcement Campaigns

Secondly, ETSC welcomes the proposals of the Commission for increased co-ordination and sharing of best practices, although the EC does not elaborate how this will be achieved. Following the publication of the EC Recommendation of 2004 on enforcement of traffic law an expert group was set up with a number of subgroups. The aim of the expert group was to do exactly this: to provide a forum and network of experts working to elaborate enforcement strategies at a national level. It also provided important input to the elaboration of the EC proposed Directive on Cross Border Enforcement. The Expert Group has not met since 2007. Since then, however TISPOL⁵ has been going from strength to

⁵ www.tispol.org

strength especially with its Lifesaver⁶ programme which aims to promote a best practice exchange amongst EU Member States on all three relevant levels of policing: the strategic, the tactical and the operational levels. Yet this project will come to an end in 2011. Clearly the EC must think through how it will achieve the objectives under this section, consult with key stakeholders and put new sustainable structures in place to ensure that enforcement in the EU reaches its full potential as one of the most important tools in road safety.

The EC Communication stresses the need for linking enforcement with information campaigns. However, in this section, the EC miss the link to the existing 2004 Recommendation on Enforcement which also includes the need to accompany police checks with information campaigns. Researchers also underline this and stress that enforcement must be highly visible and publicised and indicate that it is the drivers' subjective risk of being caught that must be increased if enforcement is to be successful (ESCAPE 2003). Communication campaigns are very important in doing this. The EC Communication emphasises that they will continue to support information actions and awareness-raising in particular for young people. However, the EC should clarify concretely how they will do this: for example through projects or EU wide campaigns. Moreover, they should wherever possible make a link to enforcement as a condition for such campaigns as without enforcement to back it up even the best information campaign can fall on deaf ears⁷.

ETSC Recommendations to the EC

- Support the swift adoption of a strong Directive on Cross Border Enforcement of Traffic Law.
- Create a new sustainable mechanism to enable the exchange of best practice on traffic law enforcement through supporting the work of TISPOL and re-launching the expert group on the EC Recommendation of 2004.
- Ensure that information campaigns are linked to enforcement.
- Promote campaigns about interaction of different vehicles i.e. bicycle/HGV and PTW/car.
- Encourage Member States to publish the results of dedicated enforcement actions on the relevant Police websites.

2.2.3. Vehicle Technology to assist enforcement

Vehicle technologies such as those that can contribute to speed enforcement and alcohol interlocks are highlighted by the EC under Objective 2 and are much welcomed by ETSC. These items will be covered in ETSC's response under Objective 5.

2.2.4. National Enforcement Implementation Plans and National Enforcement Objectives

⁶ www.tispol.org/lifesaver/lifesaver

⁷ www.cast-eu.org/

ETSC welcomes the proposal to set national implementation plans for enforcement. The link is made in a footnote to the existing EC Recommendation on enforcement in the field of road safety. Under the EC Recommendation adopted in 2003, EU countries were already asked to apply in a national enforcement plan what is known to be best practice in the enforcement of speed, alcohol and seat belt legislation.

The progress made since the publication of the 2003 EC Recommendation is acknowledged by ETSC. The EC Recommendation on enforcement has undoubtedly helped to raise the profile of traffic law enforcement in the EU countries. It has stimulated discussion and best practice exchange. Member States should therefore continue the implementation of the Recommendation. However, as the Recommendation was not legally binding, it failed to lead to an EU-wide introduction of best enforcement methods. In order to oblige all Member States to achieve high standards in enforcement, the EU should also include minimal requirements in all areas covered by the Recommendation in its discussion on the CBE Directive.

The setting of national enforcement objectives would be a new addition very much supported by ETSC. Two terms, 'enforcement objectives' and 'control objectives' are used in the Communication. ETSC strongly commends the use of the former, because while the law-abiding majority of citizens are supportive of enforcement, many are strongly resistant to the suggestion of police control over their way of life. National enforcement objectives would be a way of targeting enforcement to focus on the main areas of speeding, drink driving and non use of seat belts. This could include focussing on areas and times where and when compliance is particularly low and the numbers of accidents are particularly high.

ETSC Recommendations to the EC

- Encourage Member States to prepare national enforcement plans with yearly targets for compliance in the areas of speeding, drink driving and seat belt use.
- Ensure that enforcement through new technologies does not diminish the important role of the police officer as a deterrent presence on the roads.
- Stick to a '0 Tolerance' approach to enforcing the three priority areas of road safety legislation.
- For speeding, drink driving and non seat belt use implement best practice as indicated in the EC Recommendation on enforcement⁸.

2.3. Objective 3: Safer Infrastructure

On the TEN-T, motorways, rural roads and urban road networks, all EU Member States should be working towards the same high levels of infrastructure safety. ETSC had hoped that an area as important as infrastructure safety would be given more attention in the "Policy Orientations". The implementation of the new Directive on infrastructure safety has the potential of saving 600 lives and avoiding 7,000 serious injuries every year across

⁸ and elaborated in ETSC's Enforcement Reports 2006 and 2007.

the EU on the TEN-T network (European Commission, 2005). ETSC recognises that much benefit is expected to be delivered in terms of saving lives with the implementation of this Directive. Though these are welcome, the EC Communication proposes only two new actions. One is to build on the Infrastructure Directive and promote the application of the relevant principles of infrastructure safety management to the secondary roads and exchange best practices. Best practice exchange is also identified in the reporting requirements of the Infrastructure Directive.

The other action proposes to ensure that European funds will only be granted to infrastructure compliant with the road safety and tunnel safety Directives. This action is also very much supported by ETSC. Every year between 1.5 and 2 billion EUR of EU funds are spent on building roads in the EU, it is the EU's duty to ensure that these roads are built safely.

Infrastructure safety management is an important measure for managing speed. A number of EU funded projects have been carried out on infrastructure safety, however the implementation of the outcomes of these projects needs to be streamlined into a proper Guidance and then disseminated to the Member States. Alongside the Directive, ETSC in its Blueprint also proposed the drafting of guidelines for promoting best practice in traffic calming measures, based upon physical measures such as roundabouts, road narrowing, chicanes and road humps. These measures should be introduced as part of area-wide urban safety management, making use of the latest advances in understanding of traffic and safety management as part of urban design.

ETSC Recommendations to the EC

- Improve safety not only on the whole motorway network, but also on all urban and rural and connecting roads as well as secondary roads, including promoting the concepts of "self-explaining roads" and the "forgiving roadside".
- Draw up technical guidelines concerning the harmonised management of high risk sites by means of low cost measures. Systematic and periodic road safety inspections should be undertaken for the detection of high risk sites.
- Draft guidelines and promote their implementation by Member States on best practice in traffic calming measures.
- Publish Member States' reports foreseen in the Infrastructure Safety Directive.
- Invest in high quality infrastructure features such as road markings and road signs to enable ITS (e.g. LDWs) to work in proper synergy.

2.4. Objective 4: Safer Vehicles

Vehicles are becoming increasingly safe. The last decade has seen some improvements to vehicle safety notably through the influence of EuroNCAP. The EU needs to do its utmost in raising vehicle safety standards even further and increasing the safety for its citizens. In the view of ETSC this includes introducing in-car vehicle technologies linked to the greatest risks. As a matter of priority this should include: ISA, alcohol interlocks and seat belt

reminders,. Within Objectives 4 and 5 the EC do not prioritise in-car vehicle technologies linked to the greatest risks.

2.4.1. General Vehicle Safety Regulation

Contrary to the EC Communication, in the Memo/10/343 vehicle safety is placed as the number one priority. The focus includes first mentioning elements which will come under force under the already adopted General Safety Regulation. The way the list of safety equipment is presented in the Memo makes it look as though this is a long list of new measures, whereas as detailed below, in fact four of the measures are already adopted in EU law and will be rolled out in the next years. This of course will have an impact on saving lives.

The new regulation on the "Type Approval requirements for the general safety of motor vehicles" (Regulation EC 661/2009) advances the deployment of a number of in-vehicle technologies. Electronic Stability Control (ESC) for new car series and commercial vehicles will be phased in from 2012, with all new cars being equipped by 2014. Advance Emergency Braking Systems will be in all large vehicles from 2013. Lane Departure Warning systems will also be introduced to all large vehicles by 2013. The Regulation also foresees the compliance with the provision of visual and audible seat belt reminders for the driver's seat by the 1st of November 2012. In the Memo/10/343 the line on seat belt reminders does not specify that, under the General Safety Regulation, SBRs will be mandated only for the driver seat. ETSC stresses that this should be extended swiftly to all seats. ETSC also welcomes and supports the possibility to extend the fitting of speed limiters on light commercial vehicles.

2.4.2. Co-operative Systems

Cooperative systems, which are using communications between vehicles or vehicles and the infrastructure, may increase the safety and efficiency of road traffic considerably even before all road users are equipped with the communication required. The Commission has also proposed to further assess the impact and benefits of co-operative systems to identify most beneficial applications and recommend the relevant measures for their synchronised deployment.

The current plans and projects place the main emphasis on equipping cars, and the issues related to PTWs and VRUs are largely overlooked. It is highly likely that road users equipped with cooperative systems will pay less attention to the road users that are not equipped, and have a degraded interaction with them resulting in increased crash risks, although the situation and safety of the equipped road users will improve.

2.4.3. Pedestrian Protection

Pedestrian-friendly legislation aimed at reducing deaths and injuries of pedestrian and other vulnerable users should be a fundamental part of the EU's road safety framework. The technical requirements for the construction and functioning of vehicles and frontal

protection systems, in order to reduce the number and severity of injuries to pedestrians and other vulnerable road users who are hit by the fronts of those vehicles, are laid down in the new Regulation 78/2009 on pedestrian protection. This replaces Directive 2003/102/EC on the protection of pedestrians in the event of a collision with a motor vehicle. It also replaces Directive 2005/66/EC related to the use of frontal protection systems on motor vehicles. Passive safety requirements (vehicle design) and also active safety measures such as Brake Assist System (BAS) are included in this Regulation.

2.4.5 Underrun Protection

Another area which needs to progress and has been missed for the near future is improving front, side and rear underrun protection of heavy vehicles. Such improvements would reduce fatally and severely injured car occupants in underrun impacts in Europe as well as reducing casualties among pedestrians and cyclists.

ETSC Recommendations to the EC

- Consider extending roadworthiness Directive of 2009/40/EC to PTWs and adapt to modern vehicles and new in-vehicle technologies.
- Introduce in-car vehicle technologies linked to the greatest risks as a matter of priority.
- Develop measures to ensure that new electric vehicles are safe to use (batteries) and that interaction with other vulnerable road users are taken into account.
- Ensure that side protection closes off the open space between the wheels of all new heavy goods vehicles.
- Introduce *Energy absorbing* front underrun protection for all new heavy goods vehicles.
- Improve rear underrun protection systems with a lower ground clearance as well as higher test forces.
- Adopt legislation to ensure that every new vehicle has as standard equipment an enhanced seat belt reminder system for all occupants with audible and visual warnings.
- Regularly monitor developments in passive and active safety technologies at EU level and adopt legislation.
- Fund accident studies to compare the injuries risk posed by car models with good and bad bonnet leading edges identified in EuroNCAP tests.

2.5. Objective 5: Promote the use of modern technology to increase road safety

ETSC welcomes the decision to devote a whole objective and section of actions to promoting modern technology and ITS to increase road safety. This area has seen a recent boost for new action with the advent of the negotiation and adoption of the ITS Directive (2010) and the launch of the implementation plan for the ITS Action Plan adopted in 2008. ITS can contribute to road safety both in reducing crash risk and alleviating the severity of crash consequences. Casualty reductions vary greatly depending on the technologies and the Communication does not prioritise the most life saving devices.

The ITS ADAS (Advanced Driving Assistance Systems) applications highlighted by the EC Communication include Lane Departure Warning and Anti Collision Warning or Pedestrian Recognition Systems. Whilst important life saving devices these are not the ones that should have the highest priority. Within the context of implementing the ITS Directive and Action Plan specific reference should now be made to the three most important ADAS: ISA, Alcohol Interlocks and Seat Belt Reminders on all seats.

Moreover, it is important that the Commission remains open to new technological developments in the coming decade. Under the ITS Action Plan (Action Area 3) and ITS Directive (Annex II) the EC should also foresee the development of other new technologies. The EC Communication stresses that accelerated deployment and broad market take-up of such safety enhancing applications need to be supported. However, they do not make reference to the important role played by EuroNCAP to inform consumers about the existing and new life-saving technologies.

ETSC Recommendations to the EC

- Promote the implementation of non-industry driven and research based in-vehicle safety systems.

2.5.1 eCall

ETSC welcomes the inclusion in the EC Communication of an action to accelerate the deployment of eCall and also to examine its extension to other vehicles. Pioneered by the European Commission, the eCall technology, once in operation, will allow for an emergency call to be generated, either manually or automatically, from a crashed vehicle immediately after a road accident has occurred. Basic data on the crash, including its location, will then be transmitted to an eCall operator and simultaneously a voice communication will be established between an emergency centre and the vehicle occupants. According to the European Commission, eCall will annually save up to 2,500 lives in Europe and significantly reduce the severity of injuries in 15% of all accidents involving health damage. Indeed, the response time of emergency services plays an important role in survivability of accidents.

ETSC Recommendations to the EC

- Include eCall in vehicle type approval.
- Consider extending eCall to other vehicle types such as PTWs
- Ensure that eCall works in all 27 EU countries and in new cars of all brands and countries of origin by 2014.

2.5.2 Distraction

ETSC is particularly concerned by the lack of attention dedicated to the problem of distracted driving, which was also identified as an emerging problem in the UN resolution on Global road safety crisis, specifying a set of actions for 2010-2020⁹.

ETSC Recommendations to the EC

- Support the development of technologies to enable the police enforcement of laws governing the use of nomadic and in-vehicle devices that lead to driver distraction, such as handheld phones, DVD players, etc.
- Develop a test protocol that would provide a star rating system to provide consumers with information on the safety in actual use of navigation systems and other in-vehicle information systems.

2.5.3 Vehicle Technology to assist enforcement

a) Speed

Vehicle technologies such as those that can contribute to speed and drink driving enforcement are highlighted by the EC under the enforcement objective, which is much welcomed by ETSC. There is a well documented relationship between speed and collisions resulting in death and injury with lasting effect. The adaptation of driving speed to the prevailing conditions and speed limits is a primary way of controlling the crash risk of the driver. Under speed the concrete action section only picks up speed limiters for light vehicles as an area for action. This is welcomed by ETSC but as a first step to introducing Intelligent Speed Assistance¹⁰ (ISA). The EC Communication misses out the opportunity to explain what would be done under Objective 2 to take up "in-vehicle systems providing real-time information on prevailing speed limits". Unfortunately this area of work is not identified as an area to be taken for action in the list of priorities. This is despite the progress under the ITS Directive and Action Plan which include definition of procedures for accurate public data for digital maps. The provision of such a digital database of all speed limits on the network is an important prerequisite for the implementation of ISA.

⁹ UN Resolution 57/309 on Global road safety crisis <http://www.unece.org/trans/roadsafe/docs/A-RES-57-309e.pdf>.

ETSC, IGES, University of Leeds (2010) "Study on the Regulatory Situation in the Member States regarding brought in (i.e. nomadic) devices and their use in vehicles", Brussels.

¹⁰ ISA is the general term for advanced systems in which the vehicle "knows" the speed limit for any given location and is capable of using that information to give feedback to the driver or directly limit the vehicle speed. Navigation devices in the vehicle give a precise location and heading whilst an on-board map database compares the vehicle speed with the location's known speed limit. Drivers are then informed of the speed limit (advisory ISA), warned when they exceed the limit (supportive ISA), or actively aided to abide by the limit (intervening ISA) (ETSC, 2006b).

ETSC Recommendations to the EC

- In the short term, introduce a driver set speed limiter as a standard equipment in all new vehicles.
- Contribute to the development of harmonised standards for Intelligent Speed Assistance (ISA) systems towards eventual universal fitment.
- Adopt legislation for mandatory fitting of all fleet cars with Intelligent Speed Assistance systems.
- In the medium term adopt European legislation for mandatory fitting of European cars with Intelligent Speed Assistance systems in the type approval procedure.
- Develop a European standard for a “speed limit service”, i.e. over the air¹¹ provision to in-vehicle systems of current geodata on road speed limits.
- Require member states to provide a standardised “speed limit service” over the air.
- Adapt the EU Directive on the promotion of clean and energy-efficient road transport vehicles¹² to include in vehicle technologies (ISA) for safety in public procurement.

b) Alcohol Interlocks

The European Commission estimates that across the EU at least 25% of all road deaths are alcohol related. ETSC much welcomes the possibility of making use of alcohol interlock devices obligatory in certain specific cases, in particular for professional transport. ETSC would recommend for this to be extended to cover the rehabilitation of recidivists as well (as mentioned in the EC Memo but not in the EC Communication). The gradual introduction of alcolocks starting with target groups (commercial/public transport drivers including buses especially transporting children, dangerous good trucks¹³ and repeat drink driving offenders) could reduce the high toll of drink driving casualties every year in the EU and reduce the price for manufacturing those devices.

ETSC Recommendations to the EC

- Introduce uniform standards for alcolocks in Europe, and provide assistance to reduce the workload for those countries that wish to introduce the technology without having the appropriate legal framework.
- Legislate for a consistently high level of reliability of alcohol interlock devices.

¹¹ “Over the air”: the idea is that a car would receive updates on speed limits by wireless broadcast, e.g. over a mobile phone network. This would be able to handle permanent changes in speed limits and also temporary changes such as for construction zone. It deals with the problem of speed limit information going out of date.

¹² Directive 2009/33/EC of the European Parliament and of the Council of 23rd of April 2009 on the promotion of clean and energy-efficient road transport vehicles.

¹³ Crucially in the commercial context alcohol interlocks must not be seen as a stand-alone issue but should be introduced as an integral part of an employer’s drink driving policy. Indeed some employers have a zero tolerance to alcohol policy which is also specified in employee contracts.

- Stimulate further research into the use of alcohol interlocks in rehabilitation programmes with the goal of setting up best practice guidelines.
- Further research into the development of non-intrusive alcohol interlocks.
- In the medium term introduce legislation making non-intrusive alcohollocks mandatory for all drivers.
- Adapt the EU Directive on the promotion of clean and energy-efficient road transport vehicles¹⁴ to include in vehicle technologies for safety (alcohollocks) in public procurement.

2.6. Objective 6: Improve emergency and post injury care

In addition to the 35,000 people killed in road collisions in the European Union, about 1,700,000 people are recorded as injured in police records each year, among them 300,000 seriously. Road deaths represent only the “tip of the iceberg” of traffic collisions. For every road death in the EU, at least 44 road injuries are recorded, of which 8 are categorised as “serious”. Involvement in road accidents is one of the leading causes of death and hospital admission for EU citizens under 45 years of age.

Today, thanks to more protective vehicles and roads, better emergency response and medical progress, many deaths are prevented but the survivors remain and many are seriously injured. European and national decision makers should not neglect this less-publicised part of the real picture by referring only to road deaths. Yet, EU comparisons are hampered because both the levels of injury reporting and national definitions of a serious injury vary greatly among countries. The magnitude of underreporting undermines proper allocation of resources to preventive measures. Improving the quality of data about seriously injured survivors of road collisions is key to designing more effective safety policies. ETSC congratulates the European Commission for the new emphasis on reducing serious injuries but regrets that the adoption of a target for serious injuries is delayed until a common definition is adopted. An interim percentage reduction target in terms of existing national definitions should be set.

ETSC Recommendations to the EC

- Adopt a detailed roadmap for the adoption of a common definition of serious injuries.
- Clarify what the EC means by a global strategy of action on road injuries.
- Support diverse actions that reduce serious injury as well as deaths including vehicle and infrastructure safety, ITS, emergency first aid availability.
- Encourage Member States to improve the collection of serious injury data and estimate the real social costs of road traffic injuries.
- Set an interim percentage reduction target for serious injury in terms of existing national definitions.

¹⁴ Directive 2009/33/EC of the European Parliament and of the Council of 23rd of April 2009 on the promotion of clean and energy-efficient road transport vehicles.

- Encourage Member States to curb illegal and inappropriate speed, which will reduce injury severity in all kinds of collisions.
- Encourage Member States to aim for a 100% use of seat belts in front and rear seats, helmets and child restraint systems.
- Encourage Member States to improve long-term care and rehabilitation.
- Encourage Member States to involve health professionals to serve as opinion leaders to encourage decision makers to promote road safety legislation and help educate the public.

In May 2009, more than 100 representatives of 70 NGOs from 40 countries came together for the first time in Brussels at a meeting hosted by the World Health Organisation. Participants compiled 33 recommendations to improve road safety in an 'NGO Brussels Declaration'¹⁵. The Declaration stresses that *"serious post crash response is a vital component of effective road safety policy and includes: immediate rescue interventions, thorough investigations, criminal and civil proceedings if appropriate, long-term rehabilitation and support"*.

Therefore NGOs expect Governments to guarantee:

- Improved emergency services and early rehabilitation to minimise road trauma.
- National standards of social, medical and legal care to injured victims and bereaved families.
- Thorough and separate investigations, one in order to identify all preventable causes and another to ensure justice for victims.
- An effective, proportionate and deterrent response to traffic law violations involving death or injury.

2.7. Objective 7: Protecting Vulnerable Road Users

2.7.1. Powered Two Wheelers

ETSC welcomes the emphasis placed by the European Commission on PTWs. In 2006 at least 6,200 Powered Two Wheeler (PTW) riders were killed in road collisions in the EU25 representing 16% of the total number of road deaths while accounting for only 2% of the total kilometres driven (ETSC, 2008). Many of the recommendations presented by ETSC in its Blueprint have been taken up by the EC Communication.

These include:

- Prioritising PTW issues in the European research agenda.
- Ensure that motorcycles can also benefit from eCall, which is going to be introduced as a standard for passenger cars in many EU countries.
- Develop minimum standards regarding protective clothing.

¹⁵ www.who.int/roadsafety/ministerial_conference/ngo_declaration_full.pdf

- Introduce the mandatory fitment of advanced braking systems to PTWs as soon as possible, alongside a cost/benefit study on braking systems for smaller PTWs.
- Investigate the extent to which airbags are viable PTW safety measures.
- Prevent the engine modification of mopeds.

Adapting infrastructure is also included. But ETSC would add detail to this by stressing the need to ensure that road design, particularly curves and intersections, are optimised for the safety of the whole mix of road users, including users of PTWs, paying appropriate attention to forward visibility and signage. Also making sure to minimise the presence of excessive roadside objects, and where necessary to make them PTW-friendly. This includes maintaining road surfaces and providing maximum and consistent skid resistance. Other items which would also improve PTW safety have been missed out. These concern mainly the PTW users' aspect in particular improved rider training and targeted enforcement.

ETSC recommendations to the EC

- Work to improve data collection on exposure for PTWs. Crash investigation and databases should be standardised and allow for the inclusion of variables specific to PTW safety issues.
- Support information campaigns that increase awareness of PTWs to other road users.
- Implement the results/recommendations of the EC funded study on improved rider training.¹⁶
- Set up a Euro Helmet Scheme for Safety based on the model of the UK Sharp scheme and communicate it broadly to consumers across the EU.

2.7.2. Pedestrians and Cyclists

ETSC is disappointed that so little is proposed to protect pedestrians and cyclists. The risk of being killed in traffic per kilometre travelled is more than 9 times higher for pedestrians than for car occupants and more than 7 times higher for cyclists than for car occupants (ETSC, 2003a). The severity of injuries suffered by vulnerable road users is also higher than for car occupants. Non-motorised means of transport, such as cycling and walking, account for only a small share of distance travelled by road. But they account for much larger proportions of journeys made and time spent using the roads. It is often claimed that cycling or walking should not be encouraged as they are less safe transport modes than cars. But research rejects this argument because the advantages of walking and cycling for public health (a healthy life through regular exercise) outweigh their disadvantages (the risk of death or injury). Walking and cycling should be encouraged as travel modes for citizens across the EU, and safety of walking and cycling should be one of the objectives of safety management.

Certainly something has been achieved in the past years to improve pedestrian and cyclist safety in vehicle. But more should be done in the next decade to follow up on improving

¹⁶<http://www.initialridertraining.eu/>.

vehicle safety for VRUs. One area which needs to progress in the near future is improving front, side and rear underrun protection of heavy vehicles as mentioned in the section 2.4.

ETSC argues that the problem of ensuring the safety of non motorised traffic is not limited to the urban area; walking and cycling are also modes of transport in rural areas. Even in urban areas, measures can be adopted and implemented and linked, as the EC states, to the Urban Mobility Action Plan.

2.7.3. Children

In the EU 27 in 2006 at least 1,000 children died in traffic collisions¹⁷. Children in cars or taxis account for more than two-fifths of child deaths, whilst child pedestrians account for just over a quarter (ERSO 2007). ETSC had recommended to the EU to adopt a target of 60% reduction of child deaths between 2010 and 2020. Although children are mentioned under Objective 7 as particularly “fragile” vulnerable road users no specific measures are identified to protect them. However, in many countries child casualties are going down not because of improved safety but rather due to reduced exposure to risk as they are driven to school and spend less time out on the streets playing. Children’s mobility should instead be encouraged but of course this should be safe mobility. The EU can do much more to improve child safety outside and inside the vehicle. Directive 2003/20/EC mandates the use of appropriate child restraint systems for all children travelling in passenger cars and light vans. Yet usage of the appropriate child restraints differs greatly across Europe.

ETSC Recommendations to the EC

- Adapt the traffic system to the needs, errors and vulnerability of all road users.
- Tackle levels of underreporting amongst pedestrian and cyclist accidents and improve data collection harmonisation.
- Target speed management instruments such as enforcement and in vehicle technologies such as ISA to reduce speeds which affect pedestrian and cyclist safety greatly.
- Regularly monitor developments in passive and active safety technologies at EU level and adopt legislation.
- Fund accident studies to compare the injuries risk posed by car models with good and bad bonnet leading edges identified in EuroNCAP tests.
- Encourage the integration of road safety into land use and transport planning to improve VRU safety.
- Encourage the adoption of an EU level scheme similar to EuroNCAP to rate child safety restraints and inform consumers.
- Rapidly phase out forward facing seats and promote the supply of existing rearward facing seats throughout Europe.

¹⁷ Data provided by ETSC PIN Panelists.

2.8. Elements to be integrated in the “Road Safety Policy Orientations”

Road safety policy should be priority led and evidence based. ETSC has always stressed that the EU should focus its activities on the key causes of road traffic deaths: speed, drink and drug driving, and lack of protective systems (seat belts, child restraints and helmets), poorly constructed roads and inadequately equipped vehicles. Some of these points have been taken up within the seven objectives identified by the European Commission’s “Policy Orientations” document. This section briefly covers issues which have been missed and that should nevertheless be included at the very latest during the mid term review of the “policy orientations” if not before, as priorities for road safety work in the EU in the next decade.

2.8.1. Driving under the Influence of Drugs and Medicines

One measure which has been entirely missed out is the issue of driving under the influence of drugs. Driving affected by medicine only receives a very brief mention without any identified action. The use of illegal or psychoactive substances and medicines whilst driving is a cause for concern. In its Blueprint ETSC developed a number of recommendations for tackling this issue including developing a drugs and driving code of practice for health professionals and developing of enforcement techniques for assessing driving whilst under the influence of drugs and medicines.

2.8.2. Mobile Phone Use

Another issue which is absent is driving whilst using the mobile phone which significantly impairs driving ability. ETSC proposed that the EU consider adopting legislation banning mobile phone (hand held and hands free) use during driving (ETSC 2008).

2.8.3. Work Related Road Safety

Work related road safety has not been included by the EU either although road traffic accidents¹⁸ accounted for 39% of fatal accidents at work in 2005¹⁹. More than one in four fatal accidents at work involved a person ‘driving a means of transport or motorised and mobile handling equipment’ (ESAW 2005). This proportion is much higher in the countries that have made most progress in reducing fatal accidents in workplaces other than motor vehicles. In Europe six out of ten work accidents resulting in death are road collisions, including both collisions while driving for work and commuting collisions (Eurogip 2004). ETSC recommended in its Policy Briefing “Reducing road risk: Driving for work”²⁰ a number of areas that should be taken up by the next Road Safety Action Plan. The most important

¹⁸ European Commission (2005), Causes and Circumstances of Accidents at Work in the EU.

¹⁹ This refers to the ‘transport branch’ and fatal Road Traffic and Transport Accidents in the Statistical Classification of Economic Activities in the European Community. The data do not include commuting nor do they include Ireland or the UK.

²⁰ [http://www.etsc.eu/documents/Reducing Road Safety Risk at Work EU Overview ETSC 2010 short.pdf](http://www.etsc.eu/documents/Reducing_Road_Safety_Risk_at_Work_EU_Overview_ETSC_2010_short.pdf)

ones include that employers draft a road safety plan in compliance with EU legislation and based on a solid business case to improve the health and safety of workers. Secondly, that the EU encourage employers to adopt the new ISO international standard for road safety management (ETSC 2010).

2.8.4. Informing the Consumer Choice: EuroNCAP

Influencing the consumer to purchase safe cars is an important element of road safety and the European Commission has not identified any action involving the European New Car Assessment Programme (EuroNCAP). EuroNCAP aims to influence road safety in four ways. Firstly, by providing car manufacturers with an incentive to develop safer cars. Secondly, by encouraging more cars to be tested in the programme. Thirdly, by encouraging more countries to join EuroNCAP. Fourthly, by influencing consumer choice by providing information on safety. According to a study the risk of severe or fatal injuries is reduced by approximately 12% for each EuroNCAP star rating (Lie & Tingvall 2001). ETSC recommends that the EU promotes the work of EuroNCAP through making EuroNCAP testing obligatory for all cars entering the European market and insisting that advertisement of vehicles should mention EuroNCAP ratings.

2.8.5. European Road Safety Agency

ETSC is disappointed that the EU has not indicated the intention to create a European Road Safety Agency. A safety agency exists for each other transport mode apart from roads. The currently existing European Road Safety Observatory could provide the basis for building capacity for a European Road Safety Agency. Its roles could be manifold and cover collecting and analysing exposure data and accident data. It could also help 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 (ETSC 2008).

2.8.6. Modal shift and public transport –promoting the use of safe modes

The core public transport modes (bus and rail) are the safest modes of transport. Trips by public transport, including walking or cycling to and from access points are collectively safer than car trips (ETSC 2003). The EU should promote the extension, quality and use of public transport. Conversely more dangerous modes should be discouraged.

2.8.7 Road/Rail Safety

ETSC regrets that the new “Policy Orientations” do not include measures to address the road/rail interface. Each year, over 2,000 level crossing collisions occur in Europe (500 deaths). These avoidable collisions are almost all caused by road users’ behaviour and account for a very significant part of all rail accidents. Therefore, ETSC encourages the Commission to renew its engagement and support efforts made at national level to educate users, increase enforcement and improve infrastructure. The Commission should

also be involved at international level to promote best practices and benchmark countries' efforts.

Conclusion

In conclusion, "Towards a European Road Safety Area: policy orientations on road safety 2011-2020" includes some strong policy actions picking up important priorities for action such as on traffic law enforcement and Powered Two Wheeler safety. The new 50% reduction target for 2020 alongside the promise of a new strategy to tackle injury are also crucial to motivate all for the upcoming decade. However, much more is needed to strengthen the foreseen EU actions under the seven identified objectives. This is especially the case when it comes to fulfilling the EU's clear competency to develop new legislation. A timetable, including a mid term review, should also be added to structure and prioritise better the main measures for adoption and implementation. By reinforcing the current programme with the recommendations submitted in this document, ETSC is convinced the EU will be better placed to reach its new ambitious goal of halving road deaths by 2020.

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