



European Transport Safety Council

# BRIEFING | Road Safety

## Priorities for the EU in 2022

Memorandum to the French Presidency of the  
Council of the European Union

January 2022

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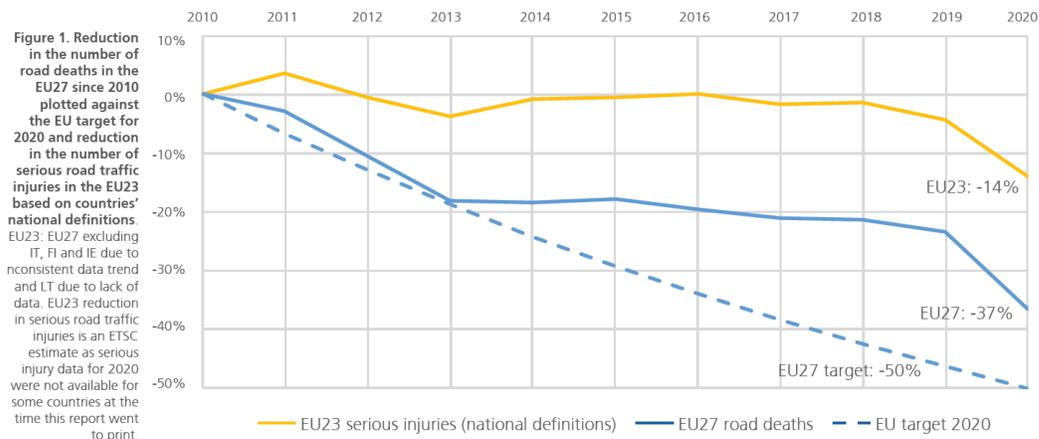
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# Introduction

France took over the EU Presidency on 1<sup>st</sup> January 2022 as the EU continues to grapple with the Covid-19 crisis, bringing additional challenges for transport and mobility policies.

18,844 people lost their lives in road traffic in the EU in 2020, 10,847 fewer than in 2010, representing a 37% decrease. There were 56,305 fewer deaths on EU roads than there would have been if deaths had continued at the same level as in 2010. ETSC estimates the monetary value to society of human losses avoided by preventing these road deaths at approximately €156 billion.<sup>1</sup>

The EU, and its Member States, agreed a target to cut road deaths by half in the decade to 2020. Over the target period 2010-2020, the largest annual reduction in the number of road deaths in the EU was achieved in 2020: 3,919 deaths were prevented in the EU in 2020 compared to 2019, an unprecedented 17% decrease in just one year. By comparison, road deaths in the EU declined by just 3% between 2018 and 2019 and by just 6% over the period 2013-2019 (Fig.1).<sup>2</sup>



<sup>13</sup> EU23: EU27 excluding IT, FI and IE due to inconsistent trend data and LT due to lack of data.

Figure 1. Reduction in the number of road deaths in the EU27 since 2010 (blue line) plotted against the EU target for 2020 (blue dotted line).

The weekly number of road deaths in the EU is equivalent to two typical passenger airliners crashing and killing everyone on board.

<sup>1</sup> ETSC (2021), 15<sup>th</sup> PIN Annual Report, <https://etsc.eu/15th-annual-road-safety-performance-index-pin-report/>

<sup>2</sup> *ibid.*

In addition, around 120,000 people were seriously injured on EU27 roads in 2019 according to European Commission estimates, based on the MAIS3+ standard definition of a serious injury.<sup>3</sup>

Yet, the exceptional 2020 results were not an extraordinary outcome of dramatic shifts in road safety policy, but rather a consequence of the unprecedented lockdowns related to the Covid-19 pandemic. A special PIN report published in July 2020 revealed a drop of close to 40% in the number of road deaths in the EU in just the month of April 2020, by which time most European countries were in the first lockdown, compared to the month of April in the previous three years.<sup>4</sup> Unprecedented restrictions on travel and movement had a significant impact on traffic levels and led to a subsequent decrease in road deaths and serious injuries.<sup>5</sup>

In this briefing, ETSC outlines its recommendations on the key EU road safety policy dossiers to be steered by the French Presidency of the European Union in the first half of 2022.

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<sup>3</sup> European Commission Press release (11 June 2020), Road safety: Europe's roads are getting safer but progress remains too slow <https://bit.ly/38CDjft>

<sup>4</sup> ETSC (2020), PIN Briefing, The Impact of Covid-19 Lockdowns on Road Deaths in April 2020, [www.etsc.eu/PINCovid19](http://www.etsc.eu/PINCovid19)

<sup>5</sup> A trend also witnessed in other parts of the world but with significant differences, in particular when expressed in deaths per billion-vehicle-km travelled. On average, the number of road deaths per billion vehicle-kilometres travelled slightly decreased in 2020 for the eleven countries with mobility data. However, there are significant variations between countries. For instance, the risk of being killed in a collision in 2020 was -17% lower in Sweden than for the 2017-19 average, but 12% higher in the Netherlands. ITF (2021), Road Safety Annual Report 2021: The Impact of Covid-19, [shorturl.at/szY79](http://shorturl.at/szY79)

# Key Priorities for the French Presidency

## TEN-T Guidelines Regulation Review

In December 2021, the European Commission proposed new rules governing the Trans-European Transport (TEN-T) networks.<sup>6</sup> The French Presidency should prioritise launching the negotiations. The most important safety related update is to ensure so-called TEN-T roads meet the standards set out in the 2019/1936 road infrastructure safety management Directive. The newly proposed TEN-T Regulation sets a timeline for the ‘core network’ to be upgraded to separate carriageways for the two directions of traffic by 2040. The entire network should be completed by 2050. However low traffic density roads (less than 10,000 vehicles per day) may be exempted from the rules as long as ‘an appropriate level of safety’ is ensured.

ETSC calls for the minimum safety requirements for such roads to be defined in more detail as the current wording is too vague. These roads should meet at least the medium to high level of safety category needed within the categorisation system set up by the requirements of the 2019 road infrastructure safety management directive.

The proposals also outline key safety objectives for separation of traffic, rest areas a maximum of 60 km apart, secure parking every 100 km and weight monitoring stations every 300 km to tackle dangerously overweight freight vehicles.

Another change is that 424 major cities that are located on major European roads (‘urban nodes’) will be required to produce Sustainable Urban Mobility Plans (SUMPs) by 2025 – which should result in improved road safety provisions in those cities that haven’t yet put such plans in place. Low speed management should be a key part of the SUMPs and duly referenced in the TEN-T Regulation.

Member States will also have to submit urban mobility data for urban nodes by 2025 and annually after this including collisions and injuries and modal share. The TEN-T Guidelines Regulation

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<sup>6</sup> European Commission (2021) Proposal for a Regulation of the European Parliament and of the Council on Union guidelines for the development of the trans-European transport network. (COM(2021) 812) <https://bit.ly/3raivUT>

proposal complement the 'urban policy initiative'.<sup>7</sup>

Improving the protection of vulnerable road users in line with the new requirements of the road infrastructure safety management Directive requires that their needs are taken into account in the implementation of all the procedures. The TEN-T proposal also calls for their needs to be 'taken into account', whereas ETSC would like more precise requirements for VRU safety such as the building of adequate infrastructure. When building or upgrading road and (railway) infrastructure, infrastructure managers should avoid the barrier effect and ensure for the safe use of pedestrian and cycling paths in order to promote the active modes of transport. ETSC also welcomes the upcoming EC guidance being developed in the framework of the infrastructure safety management Directive on quality requirements regarding vulnerable road user safety due for development in 2022.

Active road users also need special protection in the 'urban nodes' governed by the TEN-T Regulation and the new SUMP obligation and a specific aim to promote an increase in active modes in the proposal will support this. ETSC would also welcome the use of EU funds for urban mobility to support increasing the safety of pedestrian and cyclist infrastructure and thus encouraging greater physical activity benefiting health and the environment as well as accessing other public transport modes.<sup>8</sup> The TEN-T Regulation should promote the construction of safe cycling infrastructure, by including the EuroVelo cycle network as part of the TEN-T.

One omission in the new TEN-T proposal is any specific commitment on preparing roads for automated systems in transport. ETSC had called for provisions on ensuring that road markings, signs and infrastructure take into account the specific needs of e.g. traffic sign recognition and automated lane keeping systems. A fail-safe/fault tolerant design is required to guarantee that automated vehicles operate in a safe state in any event or under adverse conditions. Some elements may be covered by upcoming 'common specifications' on road markings and road signs due for adoption in 2022 under the new Infrastructure Safety Directive.

ETSC calls upon the French Presidency to prioritise discussions on the TEN-T Regulation and improve road safety in line with the aforementioned ETSC recommendations.

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<sup>7</sup> European Commission (2021) New EU Urban Mobility Framework <https://bit.ly/3raivUT>

<sup>8</sup> ETSC PIN Flash 38, How Safe is Walking and Cycling in Europe (2020) <https://bit.ly/2LJDpJu>

ETSC PIN Flash 37 Safer Roads Safer Cities How to Improve Urban Road Safety in the EU <https://bit.ly/3q6oXu2>

## Road Safety as a Priority within the Urban Mobility Package

One other priority area is urban mobility. The EC adopted a new Urban Mobility Framework including actions on road safety in December 2021.<sup>9</sup> The EC stated that: ‘Active mobility modes such as walking and cycling are low-cost and zero-emission forms of mobility which can also bring about health co-benefits associated to more active lifestyles.’ Moreover ‘to reach their full potential’ the ‘allocation of space, safety regulations and adequate infrastructure’ are needed.<sup>10</sup> 72% of the population of the EU lives in cities, so tackling urban road safety is critical to achieving the target. 38% of road deaths occur on urban roads and 70% of these are pedestrians, cyclists and powered two wheelers.

The new ‘urban policy initiative’ seeks to encourage towns and cities in the EU to move towards a more sustainable balance of transport modes, encouraging walking, cycling and public transport and will introduce better monitoring of modal split as well as road injuries and deaths. ETSC welcomes these intentions but calls for more to be done at EU level to help cut road deaths and injuries by 50% by 2030 – the EU’s agreed target.

The new urban policy initiative regrettably says little on managing inappropriate speed, for example, which is a primary or contributing factor in many road deaths in urban areas. The EP called, in its recent Report on Road Safety, for ‘the Commission to come up with a Recommendation to apply safe speed limits, in line with the safe system approach for all road types, such as maximum default speeds of 30km/h in residential areas and areas where there are high numbers of cyclists and pedestrians’.<sup>11</sup> As mentioned previously, low speed management should be a key part of the SUMP in the TEN-T urban nodes in order to reach safety and sustainability goals.

The Commission’s Urban Framework is largely based on the concept of SUMP, a concept that has been running for nearly a decade, whereby the Commission provides guidance and a framework for cities that want to map out how they can improve urban mobility, the environment and road safety. Under the new proposals, the Commission wants to extend that measure, by requiring ‘urban nodes’ to develop a SUMP.<sup>12</sup> The proposed TEN-T Regulation also calls for increase of modal share of active modes and public transport in ‘urban nodes’. And the SUMP Guidance will

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<sup>9</sup> European Commission (2021), New EU Urban Mobility Framework <https://bit.ly/3raivUT>

<sup>10</sup> ibid

<sup>11</sup> European Parliament (2021) Own Initiative Report on Road Safety <https://bit.ly/33Lj6r>

<sup>12</sup> European Commission (2021) Proposal for a Regulation of the European Parliament and of the Council on Union guidelines for the development of the trans-European transport network (COM(2021) 812) <https://bit.ly/3raivUT>

also be updated to increase walking and cycling.<sup>13</sup>

The EC's Urban Framework says that 'vulnerable road users should be given sufficient space; e.g. through the physical separation of foot, cycle/micromobility paths from motorised traffic wherever feasible'.<sup>14</sup> Also that: 'EU funding for urban mobility projects and for urban infrastructure projects should require that the projects follow the 'safe system' approach'.<sup>15</sup> ETSC would support these goals but also recommends the inclusion of the more far-reaching EuroVelo network into the TEN-T.

ETSC regrets that the EC has not adopted the more demanding call from the EP 'for the reprioritisation of transport infrastructure in urban areas, including the repurposing of public spaces, away from individual motorised transport towards sustainable, safer and healthier transport modes such as public transport, walking and cycling, while taking into consideration the special needs of vulnerable road users, such as children, persons with disabilities and older people'.<sup>16</sup>

The EP recommendations echo ETSC's recommendations from its recently published PIN Reports on Urban Mobility (2019) and Pedestrian and Cyclist safety (2020).<sup>17</sup>

Many local authorities across Europe have rapidly improved the safety of vulnerable road users since the start of the Covid-19 crisis. Cities including Athens, Paris, Berlin, Milan, Madrid, Budapest and Brussels, among many others, have boldly introduced new or expanded pedestrian and cycling infrastructure with unprecedented haste.

The EC's Urban Framework also describes this reallocation of public space to sustainable modes but stops short of supporting the EP's call for this infrastructure to be kept beyond the Covid crisis. The EP "believes that the Commission should do its utmost to ensure that the cycling and walking infrastructure deployed by the Member States as a response to the COVID-19 pandemic remains in place and is expanded in order to further promote safe active travel."<sup>18</sup>

ETSC calls upon the French Presidency to initiate an exchange between the EU Member States

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<sup>13</sup> European Commission (2021) New EU Urban Mobility Framework <https://bit.ly/3raivUT>

<sup>14</sup> ibid

<sup>15</sup> ibid

<sup>16</sup> European Parliament (2021) Own Initiative Report on Road Safety <https://bit.ly/33Lj6r>

<sup>17</sup> ETSC PIN Flash 38, How Safe is Walking and Cycling in Europe (2020) <https://bit.ly/2LJDpJu>

ETSC PIN Flash 37 Safer Roads Safer Cities How to Improve Urban Road Safety in the EU <https://bit.ly/3q6oXu2>

<sup>18</sup> European Parliament (2021) Own Initiative Report on Road Safety <https://bit.ly/33Lj6r>

and cities on implementing the measures proposed to improve urban road safety.

## eScooters

The EC has also developed guidance under the SUMP framework to help cities plan for the rollout of eScooters, a fast growing transport mode in recent years. The Guidance covers where they can be used (e.g. roads, bike lanes - not on pavements), at what speed (cut off maximum speed of 25 km/h), after which training (possibility of implementing a good behaviour card or licence), as of what possible minimum age and in compliance with which safety rules.<sup>19</sup>

The Guidance also proposes some urgent safety measures which could be taken by cities such as allocating additional space quickly by offering pop up separated cycling infrastructure which could also be used by eScooters, keeping footpaths free for pedestrians by providing parking space for eScooters by reallocating parking space used for cars to and running a safety campaign on the main rules.<sup>20</sup> New EU technical standards for the safety of the devices are also foreseen.<sup>21</sup> ETSC calls upon the EC to develop minimum vehicle safety requirements for micromobility devices and to consider the development of recommended guidelines for safe use on the roads.

ETSC calls upon the French Presidency to support the EC's elaboration of new minimum vehicle requirements for eScooters and to disseminate the new SUMP Guidance on eScooters.

## Managing of Work-Related Road Risk of Digital Platform Workers

The EC has proposed new labour law whereby workers for online 'digital platforms' are assumed to be employees and are not 'falsely misclassified' as self-employed.<sup>22</sup> This could result in millions of workers for so-called gig economy platforms such as Uber and Deliveroo receiving the same guarantees as employees on health and safety, sick pay and working hours. ETSC supports this proposal and calls for it to be improved to maximise the safety benefits by explicitly addressing the specific risks faced by platform workers in the transport sector. This includes risk assessing riders and drivers and taking action including for example setting maximum working hours to tackle fatigue, adopting compulsory training covering speeding and distraction and setting safety

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<sup>19</sup> European Platform on Sustainable Urban Mobility Plans Topic Guide Safe Use of Micromobility Devices in urban Areas (2021) <https://bit.ly/3GjxTot>

<sup>20</sup> ibid

<sup>21</sup> European Commission (2021) New EU Urban Mobility Framework <https://bit.ly/3raivUT>

<sup>22</sup> European Commission (2021) Proposal for a Directive on improving working conditions in platform work <https://bit.ly/3r9JBf0>

standards for protective equipment and fleet safety.<sup>23</sup>

Research has found that gig economy workers face a ‘perfect storm’ of risk factors on the road including inadequate training, a payment model that pressurised drivers to speed and to work while sick, no oversight of vehicle safety or condition and a lack of protective equipment.<sup>24</sup>

There are some requirements for ‘human monitoring’ of ‘automated decision making’ in order to ‘evaluate’ risks in the EC proposal as well. ETSC recommends specific rules to ban payment models that for example encourage speeding and reckless driving in the case of delivery drivers and riders.

ETSC calls on the French Presidency to support the EC proposal and strengthen the work-related road safety of employees in the EU and prioritise work to reach a general approach during their term.

## Vehicle safety

The EU has the exclusive competence to set minimum safety standards for all new vehicles sold on the EU market. These standards were updated in 2019.<sup>25</sup> They represent the most direct and effective measures the EU has to further reduce road deaths and injuries. TRL, the UK transport research laboratory, estimated in a study for the European Commission that the package of proposed vehicle safety measures could prevent around 25,000 deaths and 140,000 people seriously injured across all vehicle categories within 15 years.<sup>26</sup>

Following the adoption of the 2019 General Safety Regulation, discussions on the detailed technical standards for each technology and safety measure are still ongoing. In order to deliver on the estimated number of deaths and seriously injured to be prevented, strong secondary legislation is needed.

The French Presidency should support the highest level of standards for the specifications that remain to be delivered, in particular Direct Vision for trucks and Event Data Recorders, given their critical and long-lasting importance for improving road safety in Europe.

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<sup>23</sup> ETSC PRAISE Resources on Work Related Road Safety <https://etsc.eu/projects/praise/>

<sup>24</sup> Survey of Gig Economy Drivers, Riders and Their Managers <https://bit.ly/3nS5dvM>

<sup>25</sup> Regulation (EU) 2019/2144 <https://bit.ly/3nxMpiI>

<sup>26</sup> See page 13 of TRL on behalf of the European Commission (2018), Cost-effectiveness analysis of policy options for the mandatory implementation of different sets of vehicle safety measures - Review of the General Safety and Pedestrian Safety Regulations <https://bit.ly/39sMkHo>

## Assisted and Automated Driving

The EC Mobility Strategy for 2021 proposes to set up the revised legal framework for the approval of automated vehicles in the EU and to adopt implementing legislation for connected and automated vehicles. ETSC has long called for the setting up of a robust, harmonised regulatory framework for automated driving at EU level and such a framework is an essential precursor to automated vehicle technology becoming available on the market. A risk assessment is needed to understand the transition to connected and automated vehicles.

A serious concern, especially during the introduction and transitional stage, is looking at how these vehicles will interact with vulnerable road users. Interaction between current vehicle drivers and VRUs sometimes takes the form of communication through eye contact. Vehicles and their sensors and cameras will have to go above and beyond simple detection and be able to pick up on different forms of communication. High risk scenarios should be identified and ways found to manage all these different possibilities. This is another area that should be a priority for research and testing.

The new GSR provides a legal framework for the type-approval of automated vehicles once it applies as of mid-2022. However, detailed and robust technical standards are currently still being worked on.

ETSC calls on the EC to place the role of the driver as well as interaction between the driver and the automated driving system as central when preparing technical requirements. These are missing or taken for granted in previous regulatory developments. These detailed type approval standards should furthermore ensure that automated vehicles will pass a comprehensive test equivalent to a 'driving test', including verifying that it complies with all specific obligations and considerations of the traffic law in all EU Member States.

In this regard, ETSC calls on the French Presidency to advance on the possibilities for ensuring the safety of automated driving presented by the possible EU agency mentioned in the new EC Mobility Strategy, and urges that the type-approval and market surveillance of automated vehicles should be one of the agency's key tasks. An agency could also collect data about collisions, incidents and near misses with (semi) automated vehicles and publish the data.

Meanwhile, with regards to advanced driver assistance systems, the current rules for hands-on lane keeping assistance systems should be revised, as human factor problems such as driver

overestimation and misunderstanding have been identified.<sup>27</sup> The French Presidency should ensure that hands-off lane-keeping assistance systems are not permitted due to concerns regarding their risks for road safety.<sup>28</sup>

## Intelligent Transport Systems (ITS)

In December 2021, the European Commission presented a legislative proposal to update EU rules on Intelligent Transport Systems (ITS).<sup>29</sup> The French Presidency should ensure that a general approach on the file is adopted during its term, in view of a swift adoption of the revised rules.

Under the proposed rules, EU Member States would have to provide certain road (safety) data types as well as ITS services on road safety related events. ETSC welcomes these requirements, given their potential to improve road safety, notably the provision to provide both static and dynamic data on speed limits.

These data will then be available for use by in-vehicle safety systems such as Intelligent Speed Assistance. By requiring Member States to make data on speed limits for their entire road network available, map makers gain trusted sources – the national road authorities – to ensure the accuracy of their own data on speed limits. This in turn should ensure that drivers are correctly assisted by their ISA systems to keep to the applicable speed limit, and should furthermore minimise driver annoyance from incorrect information, both of which are vital for ISA systems to achieve their potential to improve road safety in the EU.

Given the importance for road safety as outlined above, ETSC calls on the French Presidency to be more ambitious and set the implementation dates a year earlier, in respectively 2024 and 2027.

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<sup>27</sup> Dutch Safety Board (2019), Who is in control? Road safety and automation in road traffic. <http://bit.ly/2LESsV2>

<sup>28</sup> For more information, see the second half of the following news article: ETSC (2020), Euro NCAP launches ratings for advanced driver assistance systems. <http://bit.ly/3i3Xlmo>

<sup>29</sup> European Commission (2021), Proposal for a Directive amending Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems. (COM(2021)813) <https://bit.ly/3KyecM4>

## FOR FURTHER INFORMATION

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The European Transport Safety Council (ETSC) is a Brussels-based, independent non-profit making organisation dedicated to reducing the numbers of deaths and injuries in transport in Europe.