



European Transport Safety Council

18 January 2023

To: European Commission, DG GROW
Member State Representatives of the TCMV

CC: European Commission, Road Safety Coordinator
European Commission, DG MOVE, Road Safety Unit

Subject: ETSC concerns on the weak draft rules for Advanced Driver Distraction Warning (ADDW) systems, not matching the gravity and urgency of the problem of distracted driving

Dear [European Commission – Director],
Dear [European Commission – Head of Unit],
Dear Members of the TCMV,

We are writing to you regarding our concerns about the forthcoming technical rules for advanced driver distraction warning (ADDW) systems.

Following a significant reduction in road deaths due to lower traffic levels during the COVID pandemic, the number of persons killed on European roads are regrettably increasing again. DG MOVE therefore recently warned EU Member States that progress in reducing road deaths is still too slow to meet the EU's target of halving the number of annual road deaths by 2030.¹

Distracted driving is among the most important factors leading to death and serious injury on European roads. Speakers at the recent EU Road Safety Results Conference highlighted the severity of the problems posed by distracted driving and the need to urgently address it, with the speakers representing a cross-section of society as they included government officials, civil society and private companies.²

Against this background, we are writing to you to express our disappointment with the current draft of the rules for ADDW systems³, as they lack the ambition necessary to help address the problem of distracted driving. In particular, we would like to highlight three key points on why we strongly feel the forthcoming delegated act sets the bar too low.

¹ European Commission. (2022). Road safety trends and reinforced efforts to achieve road safety targets.
<http://bit.ly/3CAxvBZ>

² European Commission. EU Road Safety Results Conference held in Brussels on 8 December 2022.
<http://bit.ly/3GWIPez>

³ Draft version 4 of the Annexes to the Commission Delegated Regulation. As made available on 16 January 2023.
<http://bit.ly/3iO9QHD>

- The draft rules propose that only the driver's gazes into an area that effectively merely covers their laps and feet as well as the equivalent section at the passenger's side are required to be detected. Warnings due to prolonged gazes away from the forward windscreen, such as to the dashboard, the infotainment system and any other devices such as smartphones placed or held in that area, are not required, even though these are of paramount importance to addressing the problem of distracted driving. The type of driver distractions that this system will help address is therefore only limited.
- Closely related to the previous point is the issue that the rules would also not require systems to warn drivers who turn towards the back of the vehicle. We deeply regret that this activity, which poses significant danger to safety and which certain suppliers have informed us is rather easily detectable, has been excluded from the requirements.
- Scientific evidence shows that glances away from the windscreen that last longer than 2 seconds are linked to doubling the risk of a collision.⁴ The current draft rules would however allow drivers to be distracted for up to 6 seconds when driving at speeds above 20km/h, but below 50km/h. This speed range is indicative of driving in an urban area, where the traffic situation is more dynamic than for example on motorways, and where vulnerable road users are commonly encountered. It is therefore incomprehensible that the draft rules differentiate based on vehicle speeds that allow drivers to be distracted for longer in urban areas.

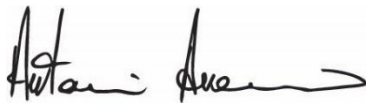
We regret that the requirements are set at such low level of ambition that it has only a low potential to improve road safety. Moreover, certain suppliers have informed us that in their view the forthcoming rules reflect the technological capabilities of years ago. A higher level of ambition is therefore technologically possible.

In our view, the proposed rules also reflect a lack of political will, as it is being argued that the rules should regulate at the level of what is commonly found on the market. Instead, we feel that regulators should push development, so that all European citizens can benefit from systems in vehicles that address the problem of distracted driving more effectively.

We therefore call on you to ensure that the draft rules are strengthened significantly prior to adoption, so that they match the gravity and urgency of the problem of distracted driving. In addition, we call on you to include a revision clause to update the forthcoming rules by 2025, with a view of expanding the types of distraction that should be detected, such as for example mind wandering.

We remain at your disposal to discuss the concerns set out in this letter.

Yours sincerely,



Antonio Avenoso
Executive Director
European Transport Safety Council



Prof. Oliver Carsten
Professor of Transport Safety at the Institute for
Transport Studies, University of Leeds (UK)
ETSC expert

⁴ Liang, Y., Lee, J.D., & Yekhshatyan, L. (2012). How Dangerous Is Looking Away From the Road? Algorithms Predict Crash Risk From Glance Patterns in Naturalistic Driving. *Human Factors*, 54(6), pp. 1104-1116. <http://bit.ly/3IFc2fl>