



European Transport Safety Council

BRIEFING | Road Safety Priorities for the EU in 2023

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

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Introduction

Spain took over the EU Presidency on 1 July 2023 as the EU continues to grapple with the ongoing war in Ukraine, which still brings additional challenges for transport and mobility policies.

There were 20,678 road deaths on EU roads in 2022. In the last decade, there have been 39,554 fewer deaths than there would have been if deaths had continued at the same level as in 2012. ETSC estimates that the total value of the human losses avoided by the reductions in the years 2013-2022 taken together compared with 2012 is about €104 billion.¹

The EU, and its Member States, agreed on a target to cut road deaths by half in the decade to 2020 and again by half by 2030. The overall progress in reducing road deaths on EU roads was good in 2012 and 2013, with an 8% decrease. But the positive start was followed by six consecutive years of stagnation with only a 6% reduction over the 2014-2019 period. In 2020 there was an exceptional drop of 17% compared to 2019. The 2020 result was strongly related to travel restrictions across Europe due to the Covid-19 pandemic. 2021 also saw a consistent drop of 13% with respect to 2019, but the number of road deaths increased by 5% with respect to 2020, influenced by a gradual relaxation of travel restrictions and lockdown requirements across Europe. 2022 saw a decrease of 9% with respect to 2019– the pre-Covid year – but the number of road deaths increased by 4% with respect to 2021, confirming the increasing road deaths trend after the Covid-19 pandemic.²

Spain only managed a 7.6% reduction between 2012 and 2021 compared with an EU average reduction of 21.1%. Looking at the pre-Covid years and now, Spain saw a small increase of 0.2% in road deaths between 2019 and 2022 (the EU total was 9%). Road deaths per million inhabitants in Spain in 2022 were 37, lower than the EU average of 46.

¹ ETSC (2023), 17th PIN Annual Report, <https://bit.ly/3PzL3VU>

² *ibid.*

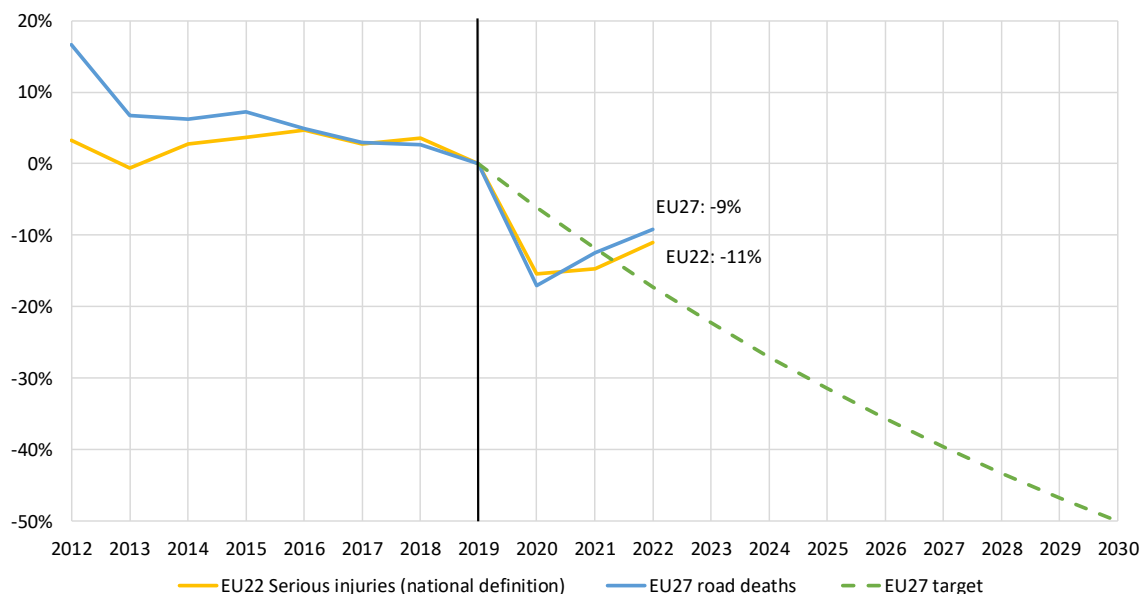


Figure 1. Change in the number of road deaths in the EU27 since 2012 compared with the EU target for 2030 and change in the number of serious road traffic injuries in the EU22 based on countries' national definitions. EU22: EU27 excluding FI, NL and SE due to lack of updated data and LT and IE due to inconsistent trend data. EU27 level of road deaths in 2022 and EU21 level of serious road traffic injuries in 2022 are an ETSC estimate as road deaths and serious injury data for 2022 were not available for some countries at the time this report went to print.

The weekly number of road deaths in the EU is equivalent to two typical passenger airliners crashing and killing everyone on board. The progress in reducing serious road traffic injuries in the last decade in the EU22³ collectively was poor, especially in comparison with the reduction in road deaths. There was only an 11% reduction over the period 2012-2022 (Fig.1). The number of serious injuries remained almost unchanged until 2019. As with road deaths, there was a substantial drop of 15% in 2020 compared to 2019 and the number of seriously injured remained stable in 2021 with a 1% decrease compared to 2020.⁴ The exceptional 2020 and 2021 results were largely a consequence of Covid-19 lockdowns and associated measures. Unfortunately, this progress has not been maintained despite more home working being done than before the pandemic.

In this briefing, ETSC outlines its recommendations on the key EU road safety policy dossiers to be steered by the Spanish Presidency of the European Union in the second half of 2023. Progress is crucial ahead of the end of the European Commission's mandate and European elections in June 2024.

³ Ibid.

⁴ Ibid.

Key Priorities for the Spanish Presidency

Cross Border Enforcement of Traffic Offences

Increased and well-publicised traffic law enforcement targeting the main risks of speeding, drink and drug driving, distraction and non-use of seat belts on the road forms a fundamental part of achieving the new EU 2030 targets.

According to the European Commission, non-resident drivers account for approximately 5% of road traffic in the EU, and a foreign-registered car is around three times more likely to commit a traffic offence than a domestically registered one.⁵

A proposal to revise the Cross-Border Enforcement Directive⁶ was published in March and welcomed by ETSC.⁷ It builds on the Directive on Cross Border Enforcement 2015/413 (CBE)⁸ which introduced the enforcement of financial penalties against drivers who commit an offence in a different EU Member State to the one where the vehicle is registered. The CBE Directive can help achieve greater compliance with traffic laws, improve road safety and ensure equal treatment of resident and foreign drivers.

The proposal includes new efforts to further enable cross-border cooperation and improve mutual assistance between EU Member States. The proposal also includes extending the scope to seven new road safety-related offences all of which ETSC supports, including: dangerous overtaking, dangerous parking, crossing one or more solid white lines, wrong-way driving, not respecting the rules on the creation and use of emergency corridors (if in place), use of an overloaded vehicle. ETSC would also like to see the same cooperation on penalties for failure of a vehicle to respect requirements of access zones e.g. pedestrian zones. ETSC also recognises the research that cites the road safety benefits of Urban Vehicle Access Regulations (UVARs).⁹ When London and Stockholm introduced their

⁵ European Commission MEMO/10/642 (2010) <https://bit.ly/3p3RbYL>

⁶ Proposal for a Directive amending Directive (EU) 2015/413, facilitating cross-border exchange of information on road-safety-related traffic offences (+Annex) COM(2023) 126 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52023PC0126>

⁷ ETSC (2022) Position on the Revision of the EU Directive on 413 Facilitating cross-border exchange of information on road-safety-related traffic offences. <https://bit.ly/3O0JdfG>

⁸ EU Directive 2015/413 Facilitating cross-border exchange of information on road-safety-related traffic offences. <https://bit.ly/3ppicEX>

⁹ Research indicates that transport pricing reforms including introducing urban access restrictions, can significantly increase traffic safety. Litman, T., (2012) Pricing for Traffic Safety-How Efficient

congestion charging schemes the cities saw reductions in deaths and serious injuries.¹⁰

To raise awareness that traffic law compliance is being monitored, enforcement must be highly visible and publicised. Research indicates that it is the drivers' subjective risk of being caught that must be increased if enforcement is to be successful.¹¹ ETSC supports the new proposal's aims to further improve communication with citizens on road traffic rules with the new and improved 'CBE Portal' including information on follow-up procedures of offences committed.

ETSC has identified further priorities to be included in the upcoming revision.¹² These include the need to update camera specifications and overcome the lack of human resources and political support for manual follow-up.¹³ The revision should also prioritise action to improve and align the enforcement of the main offences at a national level. This includes, for example, guidance on the optimal use of safety cameras to reduce speeds and increase compliance.¹⁴ ETSC would welcome the Spanish Presidency reaching an agreement on the revision of this important piece of road safety legislation.

Transport Pricing Can Reduce Roadway Crash Risks Victoria Transport Policy Institute
http://www.vtpi.org/price_safe.pdf

¹⁰ PIARC Technical Committee A3 Road System Economics and Social Development (2012) World Wide situation of road pricing and assessment of its impacts www.piarc.org 2012R01EN

¹¹ ESCAPE (2001) in PACTS Roads policing and its contribution to road safety. (2020) <https://bit.ly/35Fsh8C>

¹² ETSC (2022) PIN Flash 31, How Traffic Law Enforcement Can Contribute to Safer Roads, page 42, <https://goo.gl/GVwmf5>

ETSC (2022) Position on Revision of Cross Border Enforcement Directive <https://bit.ly/3IEVvYN>

¹³ ETSC (2016), PIN Flash 31, How Traffic Law Enforcement Can Contribute to Safer Roads, page 42, <https://goo.gl/GVwmf5>

¹⁴ ETSC (2019), PIN Flash 36, Reducing Speeding in Europe. <https://bit.ly/38ueB1q>

Driving Licence Directive

A new proposal to revise the European Driving Licence Directive¹⁵ was presented in March. Every week in the EU an average of 100 young people die on the roads and hundreds more are seriously injured.¹⁶ Improvements to driver licensing can help prevent many of these deaths and injuries involving young people.¹⁷

ETSC welcomes the new proposal as it includes elements of a graduated licensing system. For example, Member States would restrict novice drivers to a zero-alcohol limit for a minimum of two years after passing their test and give young and novice drivers the chance to gain experience whilst driving accompanied with another experienced driver in the vehicle – a measure that could also apply for HGV drivers (Category C). Testing would include a new hazard perception component as well as updated requirements to include the use of new technologies and to prepare for semi and fully-automated driving. Common EU minimum standards for driver training were not included in the proposal and would still be welcomed by ETSC if added to the proposal.

Under medical fitness, minimum standards for assessing physical and mental fitness have been updated taking into account advances in medical treatment for diseases such as diabetes. The proposed Directive would now also allow drivers with alcohol dependency to participate in rehabilitation programmes and be issued an alcohol interlock, which ETSC would welcome, though medical supervision in such programmes should be added as a pre-requisite.

On medical checks, ETSC calls for the introduction of a new screening protocol in order to increase consistency in assessing medical fitness to drive across the EU at all ages. Although age is a factor, specific medical conditions such as substance abuse, psychiatric disorders, epilepsy, diabetes, heart conditions and sleep apnea, which are not necessarily connected with age, are more important when it comes to medical fitness to drive. This is why ETSC would not support the proposed introduction of compulsory medical checks on licence renewal at 70. Instead, ETSC calls for the development of evidence-based guidelines for family doctors and other medical professionals to help assess the functional

¹⁵ European Commission (2023) Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on driving licences, amending Directive (EU) 2022/2561 of the European Parliament and of the Council, Regulation (EU) 2018/1724 of the European Parliament and of the Council and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012 <http://bit.ly/3NYyfqX>

¹⁶ ETSC (2021) ETSC PIN Flash Report 41 Reducing Road Deaths Among Young People Aged 15 to 30. <https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/>

¹⁷ ETSC (2022) ETSC Position Revision of the Driving Licence Directive. <https://bit.ly/3QKIS1x>

capabilities of someone suspected of being an unfit driver.¹⁸

ETSC is also calling for action to improve Light Goods Vehicles (LGVs) safety under the Driving Licence Directive. A total of 2630 people were killed in collisions involving LGVs in the EU in 2018 alone, representing 11% of all road deaths.¹⁹ LGV use in Europe is likely to continue to rise due to, for instance, the increased demand for home deliveries. ETSC supports extending the provisions set out for Group 2 drivers to apply also to drivers of Category B vehicles using their driving licence for professional purposes: taxis, drivers of vans (N1 vehicles). In a second step, extending the current legislative framework for professional driver training to these groups is recommended.

While PTW user road deaths have been decreasing, they have not been decreasing at the same rate as other road deaths. 4,000 riders were killed in the EU in 2021.²⁰ ETSC would like to see theoretical and practical training as well as a comprehensive practical test mandatory to obtain an AM driving license and establishing minimum standards for theoretical and practical training for AM and other categories of motorcycle in the revised Driving Licence Directive.

Finally, ETSC supports maintaining, and not lowering, the current minimum age for solo driving or riding. The younger a person starts unrestricted solo driving, the more likely it is that they will have a fatal collision, particularly below the age of 18.²¹ Thus, as a first step, it is extremely important to set an appropriate age for first unrestricted solo driving in all categories including for the professional drivers²². The EC proposes that Member States may authorise the driving on their territory of the following categories of vehicles: (c) vehicles of category B with a maximum authorised mass of 2 500 kg and a maximum speed physically limited to 45 km/h by drivers below 21 years old holding a driving licence granted for category B1. ETSC is concerned about this part of the proposal and suggests that it be deleted.²³ Raising, or not lowering, the minimum age for solo driving will save

¹⁸ ETSC (2021) PIN Flash Report Are medical fitness to drive procedures fit for purpose?

<https://bit.ly/3y9Yqml>

¹⁹ ETSC (2020) How to improve the safety of goods vehicles in the EU? PIN Flash Report 39

<https://bit.ly/3pFCEj6>

²⁰ ETSC (2023) PIN Flash Report Reducing Road Deaths amongst Power Two Wheeler Users

<https://bit.ly/3XyeR7f>

²¹ de Craen (2010) The X-factor: A longitudinal study of calibration in young novice drivers

<https://bit.ly/3ylTR63> or more recent SWOV (2014) Brain development and crash risk of young

novice drivers; A literature study <https://bit.ly/3yZrZ8W>. In ETSC PIN Flash Report 41 (2021)

Reducing Road Deaths Among Young People Aged 15 to 30. [https://etsc.eu/reducing-road-deaths-](https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/)

[among-young-people-pin-flash-41/](https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/)

²² ETSC (2022) Reducing the Minimum Age for Truck and Bus Drivers would increase safety risks

bit.ly/3XK05dF

²³ New EU Driving Rules would allow a 16 year old to drive an SUV <https://bit.ly/3NWI2xF>

lives by virtue of the fact that it prevents young and inexperienced drivers from solo driving until they are older.²⁴

ETSC calls on the Spanish Presidency to work to prioritise reaching a political agreement in the Council during their term.

EU-Wide Effect of Driving Disqualifications

ETSC fully supports the new proposal²⁵ which would provide for a Union-wide effect of driving disqualifications for major road-safety-related traffic offences committed in a Member State other than the one that issued the driving licence of the person concerned. The proposal covers offences such as excessive speeding, driving under the influence of alcohol or drugs, and causing death or serious bodily injury as a result of any traffic offence. ETSC would also support the gradual introduction of demerit point systems in all EU Member States on road safety-related traffic offences.²⁶ A 2012 meta-analysis study of European and non-European systems showed a decrease of between 15-20% in the number of collisions, deaths and injuries.²⁷ Non-financial penalties such as demerit point systems, which can ultimately lead to driver disqualification, have a strong deterrent effect and can improve road safety.

This new approach should also end impunity; non-resident drivers should not only have to pay fines but also face driver disqualification at home and abroad. This would build upon the current CBE Directive on financial penalties as a logical next step²⁸ and feed into the current revision of the Driving Licence Directive, where the Resper network already allows EU Member States to check licence withdrawal before issuing a new Driving Licence.²⁹

ETSC calls on the Spanish Presidency to work to prioritise reaching a deal with the European Parliament during their term.

²⁴ OECD (2015), Improving Safety for Motorcycle, Scooter and Moped Riders, <https://goo.gl/kAwsjq>

²⁵ European Commission (2023) Proposal for a Directive on the Union-wide effect of certain driving disqualifications COM/2023/128 final <https://bit.ly/3remCDn>

²⁶ The BestPoint Handbook: Getting the best out of a Demerit Point System. EU funded project. <https://bit.ly/3y9Yqml>

²⁷ *ibid*

²⁸ ETSC (2022) Position on the Revision of the EU Directive on 413 Facilitating cross-border exchange of information on road-safety-related traffic offences. <https://bit.ly/300JdfG>

²⁹ ETSC (2022) Position on the Revision of the Driving Licence Directive 2006/126/EC. <https://bit.ly/3Svfcfb>

TEN-T Guidelines Regulation Review

In December 2022, European transport ministers adopted a common position on the newly proposed rules governing the Trans-European Transport (TEN-T) networks.³⁰ The most important safety-related update of the proposal is to ensure so-called TEN-T roads meet the standards set out in the 2019/1936 road infrastructure safety management Directive. The Council supports the proposal of the EC to upgrade the 'core network' to separate carriageways for the two directions of traffic by 2040. ETSC regrets that the Council did not support the decision to extend this upgrade to the entire network by 2050. The exemption for low-capacity roads should give EU Member States enough flexibility to reach this requirement, and the safety gains make these upgrades worthwhile. In the European Parliament's position agreed in spring, MEPs have tightened up the requirements for the standards for low-traffic volume roads, to ensure they meet the 'high' safety category required by the EU's infrastructure safety management Directive.

ETSC supports the original EC proposal for putting rest areas at a maximum of 60 km apart, secure parking every 100 km and weight monitoring stations every 300 km to tackle dangerously overweight freight vehicles. MEPs say they want safe and secure parking for freight traffic, with a deadline of 2040, ten years earlier than in the original Commission proposal, which ETSC would support.

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 (SUMP) 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 SUMP and duly referenced in the TEN-T Regulation. MEPs also want to make sustainable urban mobility plans, a prerequisite for EU funding for road infrastructure projects in urban areas.

Member States will also have to submit urban mobility data for urban nodes by 2025 and annually after this, including collisions, injuries and modal share. The TEN-T Guidelines Regulation proposal complements the 'urban policy initiative'.³¹

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

³⁰ 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>

³¹ European Commission (2021) New EU Urban Mobility Framework. <https://bit.ly/3raivUT>

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 the safe use of pedestrian and cycling paths in order to promote active modes of transport. The European Parliament wants specific safety standards for vulnerable road users such as pedestrians and cyclists in place by 2025.

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.³² 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 was any specific commitment on preparing roads for automated systems in transport. That has been remedied by MEPs who would want the Commission to deliver common minimum standards for road markings and road signage so they can be more easily read by both human drivers and vehicle vision systems. ETSC had called for a fail-safe/fault tolerant design to guarantee that automated vehicles operate in a safe state in any event or under adverse conditions.

ETSC calls upon the Spanish Presidency to work to finalise discussions on the TEN-T Regulation with the European Parliament and improve road safety in line with the aforementioned ETSC recommendations.

³² 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>

Managing of Work-Related Road Risk of Digital Platform Workers

The EC has proposed a new labour law whereby workers for online 'digital platforms' are assumed to be employees and are not 'falsely misclassified' as self-employed.³³ ETSC welcomed national legislation introducing this concept – namely the assumption of being an employee as opposed to self-employed, in Spain in 2021. 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 standards for protective equipment and fleet safety.³⁴

Research has found that gig economy workers face a 'perfect storm' of risk factors on the road including inadequate training, a payment model that pressurises drivers to speed and to work while sick, no oversight of vehicle safety or condition and a lack of protective equipment.³⁵

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 Spanish Presidency to strengthen the work-related road safety of employees in this new law and prioritise reaching a deal with the European Parliament during their term.

³³ European Commission (2021) Proposal for a Directive on improving working conditions in platform work <https://bit.ly/3r9JBf0>

³⁴ ETSC PRAISE Resources on Work Related Road Safety <https://etsc.eu/projects/praise/>

³⁵ Survey of Gig Economy Drivers, Riders and Their Managers <https://bit.ly/3nS5dvM>

Vehicle Safety

New models of vehicles sold in the EU have to meet the world's most advanced safety standards, following the adoption of the General Safety Regulation in 2019. The life-saving technologies that are required now or will be in a couple of years include:

- Advanced driver distraction warning
- Advanced emergency braking detecting pedestrians and cyclists
- Alcohol interlock installation facilitation
- Brake assist
- Driver drowsiness and attention warning
- eCall emergency calling system
- Emergency lane keeping
- Event data recorders
- Intelligent speed assistance
- Lane departure warning
- Stability control.

The list of safety requirements for Individual Vehicle Approvals (IVAs) is also getting an update from the European Commission.

In recent years, there has been a big increase in so-called 'grey imports' of large American pick-up trucks such as the Dodge Ram or the Ford F-150. Such vehicles require the importer, whether a private individual or a specialised vehicle dealer, to get an 'individual vehicle approval' certificate before the vehicle is used on the roads. But these vehicles do not meet EU safety standards, and that situation is likely to continue if the European Commission goes ahead with plans to exclude such vehicles from many of the key requirements of updated EU vehicle safety.

It is also not currently clear how the Commission proposes to deal with European crash tests which assess safety provided in collisions with pedestrians, as these types of tests are not carried out in other markets. There has been a huge rise in pedestrian deaths in the United States in recent years, due in part to the huge rise in sales of large pick-up trucks and SUVs and lack of pedestrian protection regulations there.

Allowing weaker requirements for 3rd country imports under IVA would mean unfair competition from low quality vehicles from outside the EU, and more dangerous roads.

ETSC calls on the Spanish Presidency to ensure that there is one vehicle safety standard for the whole EU market, with no backdoor for unsuitable and unsafe vehicles.

Assisted and automated driving

ETSC calls on the Spanish Presidency to advance on the possibilities for ensuring the safety of automated driving presented by the creation of a new EU agency as mentioned in the EC Mobility Strategy, and urges that the type-approval and market surveillance of automated vehicles should be one of the agency's key tasks.³⁶ The European Commission is currently assessing this possibility. An EU road safety agency should also collect data on, and conduct and/or oversee investigations of collisions, incidents and near misses involving automated vehicles and vehicles where the assisted driving systems were active. The findings of the investigations should be published in order for the EU and UNECE rules to be improved based on the lessons learned. The Spanish Presidency should support the European Commission's initiative and strongly support setting up such a new EU agency to improve EU road safety.

Meanwhile, 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.³⁷ The Spanish Presidency should ensure that hands-off lane-keeping assistance systems are not permitted due to concerns regarding their risks for road safety.³⁸

³⁶ ETSC (2019), Briefing: EU Strategic Action Plan on Road Safety, <https://bit.ly/2TQZEP4>

³⁷ Dutch Safety Board (2019), Who is in control? Road safety and automation in road traffic. <http://bit.ly/2LESsV2>

³⁸ 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>

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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.