



BRIEFING

Road Safety Priorities for the EU in 2025

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

January 2025

Introduction

This is a time of significant political change for the European Union. A new Parliament has been formed with a new cohort of MEPs. The new college of European Commissioners has been approved and has started work. Apostolos Tzitzikostas is the new commissioner for transport. During his hearing he said that safety would be his “number 1 priority”. From the 1st of January, the Council of the European Union will be run by Poland, the latest Member State to take over the six-monthly presidency, following Hungary.

In March 2024, the European Court of Auditors (ECA) issued its first ever report on road safety saying that the EU and its Member States will need to “move their efforts up a gear” to reach the EU target to cut road deaths and serious injuries by half in the decade to 2030.

Europe’s approach to tackling road safety is indeed in trouble. According to the current trend, deaths are set to fall by only a quarter by 2030. There were 20,400 road deaths in the EU last year – down just 1% on the previous year, falling far short of the 6.1% annual reduction needed.¹ While this represents a 10% reduction since 2019 - the baseline for the 2030 target - the downward trend has flat-lined in several Member States and risen in others.

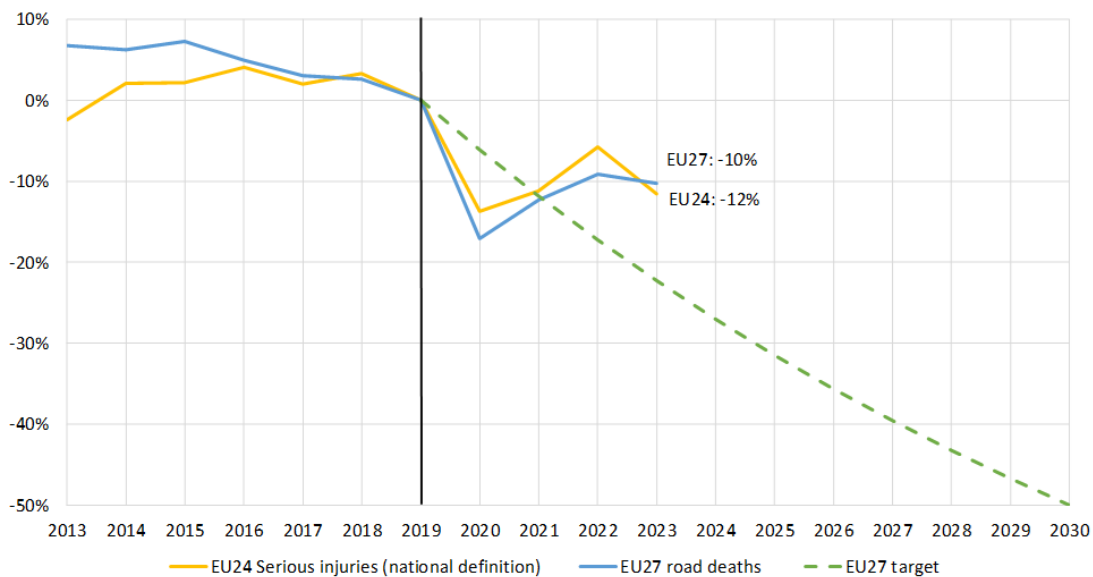


Figure 1. Change in the number of road deaths in the EU27 since 2013 compared with the EU target for 2030 and change in the number of serious road traffic injuries in the EU24 based on countries’ national definitions. EU24: EU27 excluding RO due to lack of updated data and LT and IE due to inconsistent trend data. EU27 level of road deaths in 2023 and EU24 level of serious road traffic injuries in 2023 are an ETSC estimate as road deaths and

¹ ETSC (2024) Annual Road Safety Performance Index (PIN) Report <https://tinyurl.com/nhfba8mn>

serious injury data for 2023 were not available for some countries.

To put the present situation in context, 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 over the last decade was also poor, especially in comparison with the reduction in road deaths. There has only been a 10% reduction over the period 2013-2023. The number of serious injuries remained almost unchanged until 2019. As with road deaths, there was a substantial drop of 14% in 2020 compared to 2019, most likely due to the various measures imposed during the Covid-19 pandemic. The number of serious injuries increased by 3% in 2021 compared to 2020 and increased again by 6% in 2022 compared to 2021. 2023 saw a decrease of 7% in serious injuries compared to 2022.

Given the current stagnation in road deaths, much bolder measures will be needed than the rather modest inventory included in the recently adopted Council conclusions² in order to hit the target EU transport ministers set to cut road deaths and serious injuries in half by 2030.

ETSC has set out its priorities for the 2024-2030 mandate in a briefing.³ It is vital that the new MEPs and Commissioner Tzitzikostas identify areas for action quickly also within the context of the upcoming mid term evaluation of the EU Road Safety Strategy.⁴

In this briefing, ETSC outlines its recommendations on the key EU road safety policy dossiers to be steered by the Polish Presidency of the European Union in the first half of 2025.

² Transport Council Conclusions <https://www.consilium.europa.eu/en/press/press-releases/2024/06/18/road-safety-council-approves-conclusions-to-strengthen-the-eu-s-efforts-to-achieve-its-road-safety-objectives/>

³ ETSC (2024) Road Safety Priorities for the EU 2024-2029 <https://tinyurl.com/mr4273rp>

⁴ EC (2019) Road Safety Strategy <https://tinyurl.com/49tdbjse>

Roadworthiness

A revision of the EU² roadworthiness package is overdue, and was already expected in spring 2024. It was last revised a decade ago in 2014 and consists of Directive 2014/45/EC on Periodic Roadworthiness tests, Directive 2014/47/EC on technical roadside inspections of commercial vehicles and Directive 2014/46/EC on the requirements for issuing registration certificates.

Both national and European law require motorists to keep their vehicles in a roadworthy condition. However, not all vehicle owners do so, and roadworthiness testing exists so that a vehicle's original design and manufacture are retained in service. There is a clear correlation between severity of collisions and vehicle age, mileage and the constant need to tighten up the technical controls of older vehicles. Moreover, the European Court of Auditors' recent report noted that the flagship EU General Safety Regulation, which applies to all new vehicles sold from July this year, will not lead to the expected reductions in deaths because Europeans are replacing their vehicles less often.⁵ This ageing fleet makes roadworthiness checks even more important.

ETSC recommends that all motor vehicles, including all motorcycles, are tested four years after their first registration date, then again after two years, and then every year after that.⁶

Since 2014, the law's last revision, both cars and in-vehicle safety systems that are electronically controlled have continued to develop rapidly and preparations are underway for automated vehicles. Vehicle examiners need to ensure a rigorous testing regime for new in-vehicle technologies mandated under the 2019 General Safety Regulation, such as Automated Emergency Braking systems. Automated vehicles must also be regularly tested to evaluate safety performance within the framework of regular roadworthiness tests.

Technical failures of powered two wheelers (PTWs) can have much more severe consequences than those for cars, and the technical condition of the vehicle can influence the consequences and the severity of a crash. To date, 18 of 27 EU Member States have required motorcycle owners to have their vehicles checked for roadworthiness. ETSC supports the inclusion of all PTWs in the testing regime.⁷

The rules on the roadside inspection of motor vehicles and their trailers used in professional transport should also be updated. This should include improving the quality of the checks by

⁵ European Court of Auditors (2024) Reaching EU road safety objectives, Time to move up a Gear <https://tinyurl.com/4294wr74>

⁶ ETSC (2020) Position Paper Roadworthiness Package <https://etsc.eu/position-paper-vehicle-roadworthiness-package-implementation-reports/>

⁷ *ibid*

setting and collecting KPI data and making use of the 'risk rating profile'. The inclusion of vans in roadside inspections would also be welcomed as they continue to increase in number and data on collisions involving light goods vehicles show that the number of deaths is on a par with those involving heavy goods vehicles. As with heavy goods vehicles, vans should be selected for inspection based on the risk profile of the operators and high-risk undertakings should be targeted to reduce the burden on operators that properly maintain their vehicles.

EU-Wide Effect of Driving Disqualifications

ETSC fully supported the proposal 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.

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 Cross-Border Enforcement (CBE) Directive on financial penalties as a logical next step and feed into the current revision of the Driving Licence Directive.

A General Approach⁸ was reached under the Hungarian Presidency in December 2024 and the first trialogue negotiations have been launched. The Council's position proposes to insert driver disqualification under the new directive on Driving Licences, which is currently also under negotiation. Thus, the logic is that the inclusion would build on the mechanism for mutual recognition of the driving licences already in the driving licence Directive. Another change in the Council position is to exclude disqualifications with a duration of less than three months and for which the remaining period to be served is less than one month from the scope of the directive. Their text also limits the information contained in the notification of the driving disqualification, and limits the amount of information to be exchanged between the member state of issuance and the member state of the offence. National contact points would be used, and all information would be exchanged in secured digital format, through the EU driving licence network (RESPER).

⁸Council General Approach on the Driving Disqualification Directive 2024 <https://tinyurl.com/2fyers65>

The European Parliament adopted its approach in December 2023.⁹ The initial proposal by the European Commission included an exemption where a driving ban resulting from speeding would not be recognised in another country if the speed limit had been exceeded by less than 50 km/h. MEPs proposed to modify this exemption so that it should only be valid on residential roads if the speed limit has been exceeded by less than 30 km/h, and on non-residential roads if exceeded by less than 50 km/h, same as in the Council text. ETSC sees this as an improvement but in principle, all driving bans resulting from speeding should universally apply in other Member States without any exceptions.

ETSC would also support the gradual introduction of demerit point systems in all EU Member States on road safety-related traffic offences. A 2012 meta-analysis study of European and non-European systems showed a decrease of between 15 and 20% in the number of collisions, deaths and injuries. 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. 22 out of 27 EU Member States now have these systems, which discourage dangerous driving. It is essential that drivers also face these non-financial penalties when they commit traffic offences abroad. An approach is needed which deters repeat offenders, at present this is included under the review clause of the Council position.

ETSC calls on the Polish Presidency to work to prioritise reaching an agreement during their term.

Driving Licence Directive

The European Commission came forward with a proposal to revise the current Driving Licence Directive in spring 2023. MEPs and the Hungarian Council launched negotiations in autumn based on the Council 'general approach' of December 2023, and the European Parliament position of March 2024.

ETSC calls on the Polish Presidency to work to prioritise reaching a political agreement on behalf of the Council with the Parliament and uphold the parts of the proposal¹⁰ which would improve safety and not lead to a degradation.

⁹ ETSC Press Release (2023) MEPs back tougher stance on cross-border enforcement of dangerous driving <https://tinyurl.com/yv9ntyeh>

¹⁰ ETSC (2022) ETSC Position Revision of the Driving Licence Directive for full set of Recommendations: <https://tinyurl.com/mszwsnb2>

Lower drink-driving limits for novice drivers

The original proposal included a graduated licensing system with a probationary period of two years after passing the driving test where, for example, an 0.2 BAC lower drink-driving limit should apply. ETSC is strongly calling for support of this which at present is fully supported by the European Parliament.

ETSC does not want to see a lowering of age limits in any vehicle category

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 collision resulting in death, particularly below the age of 18. 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 drivers. At present both MEPs and the Transport Council have backed the requirement that, in future, all EU Member States must issue driving licences to 17-year-olds to drive cars under an accompanied driving scheme.

The Council's position says that Member States should not be forced into allowing 17-year-olds to drive HGVs. However, the European Parliament would like to require Member States to introduce this rule.

ETSC says this has the potential to expand the number of teenagers driving lorries – and that would have very negative consequences for road safety. Data from countries that do allow it including Finland, Germany and Poland clearly show that the youngest lorry drivers (18-19 years) are much more likely to cause a crash.¹¹ From a road safety perspective ETSC calls for the minimum age in the EU for lorry drivers to remain at 21 – that is today's 'recommended' minimum. Raising, or not lowering, the minimum age for solo driving will save lives by virtue of the fact that it prevents young and inexperienced drivers from solo driving until they are older.

Changes to testing requirements

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. These additions are supported by both MEPs and Council. However, common EU minimum standards for driver training and requirements for instructors were proposed by MEPs but did not find majority support but would be strongly welcomed by ETSC if still integrated into a

¹¹ ETSC (2022) Briefing – Reducing the minimum age for driving an HGV, Bus or Coach in the EU would increase safety risks <https://tinyurl.com/muzw5y4m>

final agreement.

Making sure drivers of all ages are fit to drive

ETSC has called for the introduction of a new 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 apnoea, 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 capabilities of someone suspected of being an unfit driver and co-ordinate with the licencing authorities. This will be one of the key areas for the negotiations between the European Parliament and Council.

The Council general approach states that Member States may reduce the administrative validity from 65 to apply increased medical checks, self-assessment or other specific measures including refresher courses. Member States may, instead of requiring a medical examination, either require the applicant or holder to fill in a self-assessment form covering all the medical conditions mentioned in Annex III when issuing or renewing a driving licence. Alternatively they may establish a 'national mechanism' to ensure that significant changes in the physical or mental fitness are acted upon in order to comply with the minimum standards of physical and mental fitness set out in Annex III, after the licence has been issued to the applicant after a medical examination or self-assessment.

MEPs voted for an amended text that would allow, but not oblige, Member States to limit the period of administrative validity of individual driving licences for any category, while considering medical fitness and ability to drive safely in accordance with Annex III. They would give them the option to apply an increased frequency of medical checks or other specific measures, in order to further improve road safety measures. Also, MEPs would have new applicants or those renewing their licences to do either a self-assessment or a medical examination.

Furthermore, also 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.

Alcohol interlocks rehabilitation programmes for convicted drink-drivers should be accessible to alcohol-dependent people

The proposed Directive would now allow drivers with alcohol dependency to participate in rehabilitation programmes and be issued an alcohol interlock. ETSC welcomes this change

and both the Parliament and Council support it. ETSC says that medical supervision in such programmes should be added as a pre-requisite.

Van drivers need professional training

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. 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.

Mandatory training and testing for low-powered motorcycle riders

While motorcyclist 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 2021.¹² ETSC would like to see theoretical and practical training as well as a comprehensive practical test mandatory to obtain an AM driving license. The Council supports a mandatory theoretical test for AM and as for category A or A2, and on the condition that they have acquired a minimum of two years' experience on a motorcycle in category A1 or in category A2 respectively, either: (i) passed a test of skills and behaviour only, or (ii) completed a training pursuant to Annex VI. ETSC would also support minimum standards for theoretical and practical training for all categories of motorcycle in the revised Driving Licence Directive.

Children as young as 16 should not be allowed to drive cars

Finally, the proposal includes the possibility for Member States to allow 16-year-olds to obtain a 'B1' license, enabling them to drive a car weighing up to 2500 kg as long as a speed limiter is fitted that prevents the vehicle from accelerating above 45 km/h.

The European Commission's impact assessment on the new driving licence proposals said, in reference to the B1 license changes: "the measure may pose an additional road safety risk, notably for vulnerable road users" but then attempted to play down the effects by noting that the speed and weight had been 'significantly limited'. However, the weight limit proposed is 2.5 tonnes, which would include some of the heaviest SUVs on the European market. The Commission also proposes a higher speed limit of 45 km/h, considerably higher than the 30

¹² ETSC (2023) Reducing Road Deaths among Powered Two Wheeler Users (PIN Flash 44)
<https://tinyurl.com/yz44rhaa>

km/h allowed in Sweden in the only real world example of very young drivers allowed to drive full size cars (known as A-traktors).

This provision remains in both the positions of the Council and the European Parliament. ETSC is concerned about this part of the proposal and strongly suggests that it be deleted.

Weights and Dimensions Review

ETSC strongly opposes the proposal to lift restrictions on the cross-border transport of European Modular Systems (EMS), also known as “gigaliners” or “megatrucks.” Typical EMS are lorry and trailer combinations 25.25 meters long, nearly 9 meters longer than standard lorries in Europe, and weighing 60 tonnes. To put that into perspective, “megatrucks” are as long as six passenger cars and weigh as much as a fully loaded Boeing 737 300. In Finland, 34.5m, 76-tonne configurations are even permitted.

ETSC has serious concerns about the impact of EMS vehicles on road safety. They have been allowed until now under strict conditions in a limited number of EU countries, but all the impacts of wider adoption have not been fully assessed.¹³

To ETSC’s dismay, the proposal also contains no specific legal safeguards on which parts of the road network EMS should be confined to. Moreover, the proposal requires Member States to ensure the connectivity of the part of the network where European Modular Systems can circulate in their territories with the road network of neighbouring Member States that also allow the circulation of EMS, in order to enable cross-border traffic. Those road networks around EU borders might not be suitable for the circulation of EMS vehicles.

Similarly, the proposal fails to provide specific legal safeguards regarding who drives longer and heavier vehicles. That means that in several EU countries, 18-year-olds could drive them without requiring any additional training compared to what is required for a standard lorry.

A recent study¹⁴ also shows that the expansion of longer and heavier road freight transport will have substantial negative effects on the rail freight sector, which has a considerably better safety record.

Some Member States have expressed similar concerns during Transport Council meetings. A similarly controversial proposal by the Commission was rejected by the Council back in 2014,

¹³ ETSC Press Release (2024) European Parliament Backs Mega-Trucks Big Lorries, Big Mistakes <https://tinyurl.com/26nycjuz>

¹⁴ CER Reports (2024) Study on Weights and Dimensions <https://www.cer.be/cer-reports/study-on-weights-and-dimensions>

and not much has changed since.

The European Parliament narrowly voted in favour of the new provisions to expand the use of megatrucks in March last year. Almost half of MEPs wanted to remove the new provisions but an amendment to do that failed to pass by just six votes.¹⁵

Presently, the Council has yet to reach a consensus on its general approach to the proposal. ETSC calls on the Polish Presidency and the Council to maintain the current practice of limited trials of EMS where the impacts can be more closely monitored.

Another key aspect of the EC proposal is to raise the weight limit for zero-emission vehicles from the current 40 tonnes to 44 tonnes. This change would allow operators to carry more freight if electric powertrain technology became lighter over time. Commending the European Commission's initiative to encourage Zero Emission (ZE) technologies, ETSC supports this effort on the condition that a review monitoring any potential heightened road risk due to increased weight is made five years after implementation.

Vehicle Safety

Following the coming into force of new vehicle safety regulations in the European Union, the list of safety requirements for Individual Vehicle Approvals (IVAs) is being updated by the European Commission. European and national individual vehicle approvals must be used for any vehicle imported or constructed in the EU for use on public roads that has not been type approved.

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 regulations.

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

¹⁵ ETSC Press Release (2024) European Parliament Backs Mega-Trucks Big Lorries, Big Mistakes <https://tinyurl.com/26nycjuz>

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 Polish 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

EU Agency

ETSC calls on the Polish Presidency to advance progress on the establishment of a new EU agency for ensuring the safety of automated driving, as announced in the European Commission's Mobility Strategy. The European Commission is currently assessing this possibility but a report on the topic is overdue for publication.

ETSC recommends that type-approval and market surveillance of automated vehicles should be one of the agency's key tasks. The 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 EU and UNECE rules to be improved based on the lessons learned.

Rules for driver assistance systems should not blur the lines with automated vehicles

The current rules for assistance systems are being revised at UNECE's WP.29. Human factor problems such as driver overestimation and misunderstanding as well as an increased propensity to engage in non-driving related activities have been identified. While the new UN Regulation on the so-called driver controlled assistance systems (DCAS) adopted in early 2024 is largely a welcome improvement to addressing these human factor problems, recent draft updates to that regulation would allow drivers to take their hands off the steering wheel as a comfort function, and would further allow the vehicle to make manoeuvres without the driver needing to initiate or confirm them. The driver remains fully responsible for the driving tasks, but would have very little actual potential to intervene if the DCAS system decided, for example, that it was safe to change lanes.

ETSC is gravely concerned about these developments, as they risk amplifying the previously mentioned human factor problems. Moreover, from the perspective of ordinary citizens, there is little that differentiates systems which do not require hands on the steering wheel

and which make manoeuvres without driver involvement, from automated driving systems that do the same.

Shifting responsibilities entirely to the driver is unfair, as most control over the vehicle would be with the DCAS system. Moreover, in order to ensure safety, the driver would have to take on the additional task of supervising the DCAS' operation, which is a task for which they are not trained nor a task humans are good at for prolonged periods of time.

The draft update of the DCAS regulation would limit hands-off assisted driving to motorways, whereas system-initiated manoeuvres would be allowed on motorways while the driver has their hands on the steering wheel. This represents a compromise between the positions of proponents of increasing the functionalities of DCAS and those that are concerned about the above-mentioned side-effects of increasingly automating the driving task. ETSC nevertheless remains concerned.

Moreover, ETSC is gravely concerned about the tremendous pressure put on regulators to lift the aforementioned restrictions for hands-off driving and system-initiated manoeuvres. Several stakeholders have called for the compromise to be amended before the update's adoption (expected in March 2025) in order to allow system-initiated manoeuvres to be made on motorways while drivers have their hands off the steering wheel. In a following phase, those stakeholders would also like to see both system-initiated manoeuvres and hands-off driving expanded to other driving environments, such as urban areas.

ETSC is calling on regulators to first await real-world evidence demonstrating the actual safety of these systems, before any consideration is given to lifting those restrictions. This is especially important in terms of verifying whether the assumed improvements related to human factors made in the DCAS regulation (e.g. strengthen driver monitoring requirements), also lead to safe system use by drivers in practice. The DCAS regulation's in-service monitoring and reporting requirements should be able to provide more information on the actual safety of these systems, once vehicles equipped with DCAS come to the market and manufacturers subsequently start reporting to authorities.

The Polish Presidency should ensure that hands-off lane-keeping assistance systems are not permitted outside of motorways due to concerns regarding their risks for road safety, and similarly that system-initiated assistance features that primarily aim to increase the comfort of the driver (e.g. automatic lane changes to overtake slower moving vehicles) are not allowed while driving hands-off on motorways, as they increasingly blur the line between automated and assisted driving.

Ellen Townsend, Policy Director
ellen.townsend@etsc.eu

European Transport Safety Council
20 Avenue des Celtes
B-1040 Brussels
Tel: +32 2 230 4106

www.etsc.eu

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