



# **Briefing: Road Safety Priorities for the EU in 2025**

**Memorandum to the Danish Presidency of the Council of the European Union**

**July 2025**

## Contents

Introduction.....	3
Enhancing EU Roadworthiness Rules: Extending Checks to All Vehicle Types .....	5
Road Safety in the EU Budget: A Smart Investment with High Returns .....	7
Megatrucks and Road Safety: Risks in the EU Weights and Dimensions Review .....	9
Closing the Loophole: Reforming Individual Vehicle Approvals (IVA) .....	11
Trade agreements must not undermine EU vehicle safety standards .....	13
Assisted and automated driving .....	14
EU Agency.....	14
Rules for driver assistance systems should not blur the lines with automated vehicles ....	14

## Introduction

The Danish Presidency of the Council of the European Union, from July to December 2025, takes place against a backdrop of considerable geopolitical and economic uncertainty. The European Union faces continued instability in its neighbourhood, rising living costs, and complex challenges tied to the climate and industrial transitions. In this environment, the EU must remain focused on policy areas that deliver high social value, protect lives, and support a resilient and inclusive Europe. One such area is road safety.

This briefing from the European Transport Safety Council (ETSC) outlines the key EU road safety policy files expected to be in progress during the Danish Presidency and highlights urgent priorities for legislative action, investment, and oversight.

We are now halfway through the EU Road Safety Policy Framework for 2020–2030. The collective objective to halve road deaths and serious injuries by 2030 remains both urgent and achievable. But progress is alarmingly off track. In 2024, 20,017 people died on EU roads. Over the last decade, the EU27 has achieved only a 17% reduction in road deaths—far below the pace needed to meet the 2030 target. From 2014 to 2019, progress stalled at just a 6% reduction. Since then, the trend has barely improved: deaths fell by only 1% in 2023 and 2% in 2024.

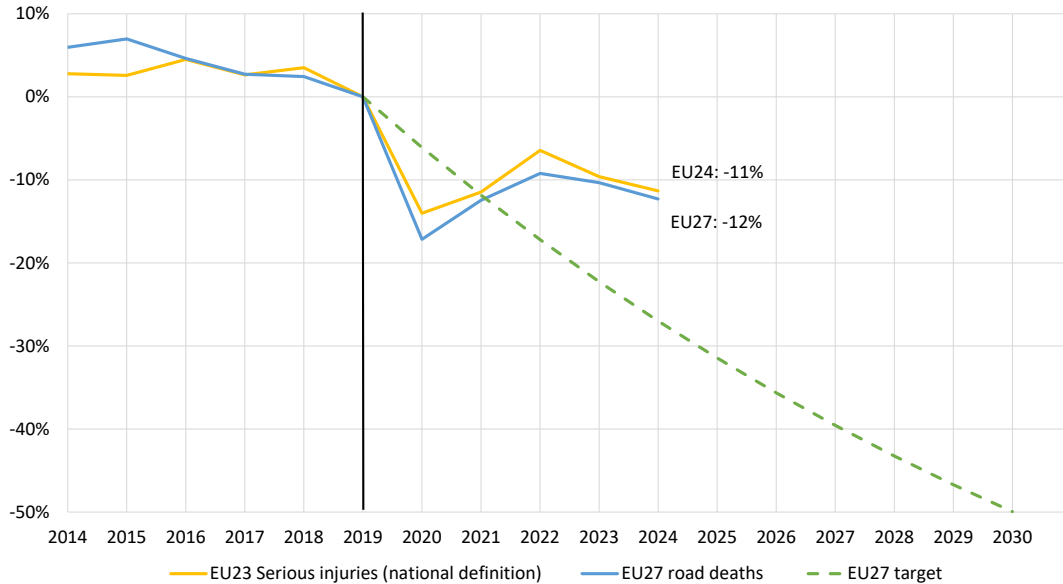


Figure 1. Change in the number of road deaths in the EU27 since 2014 compared with the EU target for 2030 and change in the number of serious road traffic injuries.<sup>1</sup>

<sup>1</sup> 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 2024 and EU24 level of serious road traffic injuries in 2024 are an ETSC estimate as road deaths and serious injury data for 2024 were not available for some countries at the time this report went to print.

In its first-ever report on road safety, the European Court of Auditors (ECA) warned in March 2024 that the EU and its Member States must “move their efforts up a gear” to stay on track.

<sup>2</sup> The cost of inaction is measured not only in thousands of preventable deaths, but also in billions of euros in healthcare, economic, and social losses.

At a time when the EU is working to strengthen its strategic autonomy, road safety policy remains a proven European success story—and a core part of the social contract. Safe, clean, and efficient mobility underpins the functioning of the single market, supports climate and modal shift goals, and provides a clear, visible benefit to citizens in their daily lives.

The European Commission’s flagship Road Safety Package, published in 2023, has now completed the legislative phase, with political agreements reached on all three components: the revised Driving Licence Directive, the revised Cross-Border Enforcement Directive, and a new Directive on Driving Disqualifications. A proposal to revise EU rules on periodic vehicle inspections has also been published, and a mid-term evaluation of the EU Road Safety Policy Framework is expected later in 2025.

Preparations for the next EU budget are also underway, with proposals expected during the Danish Presidency. This budget will be crucial for the future of road safety in Europe. The current Strategic Action Plan on Road Safety includes funding measures supported by the 2021–2027 budget. That support must not only continue but be reinforced. EU funds should be targeted at the measures within the 2020–2030 Road Safety Programme with the highest proven lifesaving potential. <sup>3</sup>

A recent European Court of Auditors report warned that safety is often not prioritised when EU funds are allocated to transport projects. Without stronger prioritisation rules, reductions in road safety investment are likely. ETSC calls for road safety to be fully integrated into the EU’s budget planning and for it to be included in the Commission’s country-specific recommendations under the European Semester process.

ETSC has outlined its full set of priorities for the 2024–2030 mandate in a separate briefing. <sup>4</sup>As the new Parliament and Commission settle into their roles, it is essential that Transport Commissioner Apostolos Tzitzikostas and Members of the European Parliament act quickly to refocus attention on road safety—beginning with the mid-term evaluation and the legislative and budgetary opportunities ahead.

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<sup>2</sup> <https://www.eca.europa.eu/en/news/NEWS-SR-2024-04>

<sup>3</sup> EC (2019) Road Safety Strategy <https://tinyurl.com/49tdbjse>

<sup>4</sup> ETSC (2024) Road Safety Priorities for the EU 2024-2029 <https://tinyurl.com/mr4273rp>

## Enhancing EU Roadworthiness Rules: Extending Checks to All Vehicle Types

A revision of the EU roadworthiness package was published in April 2025. It was last revised 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. With Europe's vehicle fleet ageing and new safety technologies becoming standard, ETSC stresses the urgent need to adapt inspection regimes to current risks.<sup>5</sup>

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.<sup>6</sup> This ageing fleet makes roadworthiness checks even more important. The EC has proposed that older vehicles (above 10 years) would now require annual roadworthiness checks.

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. The EC proposal says that new mandatory safety technologies, required on new types of vehicle in the EU since 2022, as well as other vehicle assistance systems, would be subject to regular checks to see that they are still functioning correctly. 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 in powered two-wheelers (PTWs) can lead to far more severe consequences than similar failures in cars. The condition of a PTW at the time of a crash can significantly affect both the likelihood of a collision and the severity of injuries sustained.

Currently, over half of the EU's 27 Member States require motorcycles to undergo periodic roadworthiness testing. The European Commission has proposed extending mandatory

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<sup>5</sup> ETSC Position Paper Roadworthiness of Vehicles (Updated 2025) <https://tinyurl.com/y5bww7m2>

<sup>6</sup> European Court of Auditors (2024) Reaching EU road safety objectives, Time to move up a Gear <https://tinyurl.com/4294wr74>

testing across the EU to include all motorcycles with an engine capacity over 125cc. This would remove the existing exemptions in a few countries and establish a consistent minimum standard.

However, under the new Commission proposal, mopeds and motorcycles up to and including 125cc would remain excluded from mandatory testing. ETSC recommends a more comprehensive approach: all motor vehicles, including all categories of motorcycles, should undergo roadworthiness testing four years after first registration, followed by tests every two years, and annually thereafter.

The European Commission has proposed extending roadside checks on commercial vehicles to include vans, as well as introducing inspections focused on cargo securing. This is a welcome development. The number of vans on Europe's roads continues to grow, and data on road collisions show that deaths involving light goods vehicles are comparable to those involving heavy goods vehicles. Including vans in regular roadside inspections is therefore a necessary step toward improving road safety.<sup>7</sup> As with heavy goods vehicles, vans should be selected for roadside inspection using risk-based profiling. This approach ensures that enforcement focuses on high-risk transport operators, while reducing unnecessary checks on operators who consistently maintain their vehicles to a high standard.<sup>8</sup>

For ETSC's full position on the roadworthiness proposals, see:

<https://etsc.eu/etsc-position-paper-roadworthiness-of-vehicles/>

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<sup>7</sup> ETSC Position Paper Roadworthiness of Vehicles. (Updated 2025) <https://tinyurl.com/y5bww7m2>

<sup>8</sup> Ibid.

## Road Safety in the EU Budget: A Smart Investment with High Returns

Preparations are underway for the next EU budget for the period 2028–2034. A legislative proposal is expected during the Danish Presidency.

The current EU Strategic Action Plan on Road Safety is supported by the 2021–2027 EU budget. Going forward, EU funds should continue to support the implementation of the EU Road Safety Programme 2020–2030—particularly the measures with the greatest potential to save lives and prevent serious injuries. Both deaths and serious injuries on the roads impose a heavy social and economic burden. That’s why it is essential that the next EU budget includes strong financial support for effective, evidence-based road safety measures.

ETSC continues to call for the establishment of a dedicated EU Road Safety Agency to coordinate and support efforts across Member States and, in particular, to ensure safe rollout of assisted and automated driving consistently across the EU (see later section).

A key priority for the new budget period should be improving road infrastructure safety. EU funds allocated to the construction of new roads and the upgrading of existing infrastructure must be used to enhance safety. The revised TEN-T Regulation, adopted in 2024, now explicitly refers to two important EU directives—Directive 2019/1936 (on road infrastructure safety management) and Directive 2004/54 (on road tunnel safety)—and requires Member States to apply their provisions across the entire TEN-T network.

However, a recent report by the European Court of Auditors (ECA) raised concerns. It found that road safety was often not a central consideration when EU funds were allocated to infrastructure projects. Specifically, project selection criteria frequently failed to prioritise accident hotspots, meaning that opportunities to save lives were being missed.<sup>9</sup>

Regional funding dedicated to improving road infrastructure safety must not be reduced in the 2028–2034 funding period.<sup>10</sup> The ECA warned that recent cuts in funding could lead to at least a proportional decrease in future road safety investment—unless new prioritisation rules are introduced to protect and strengthen this area.

Finally, feedback and guidance from the European Commission will be crucial. ETSC calls for road safety to be systematically included in the Commission’s country-specific recommendations issued through the European Semester process.

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<sup>9</sup> Ibid

<sup>10</sup> CEF Manifesto More EU Budget for Transport <https://tinyurl.com/fbna825p>

For ETSC's full position paper on the new EU budget see:

<https://etsc.eu/eu-multiannual-financial-framework-2028-2034-funds-for-road-safety/>



## Megatrucks and Road Safety: Risks in the EU Weights and Dimensions Review

ETSC strongly opposes the European Commission’s proposal to lift restrictions on the cross-border transport of European Modular Systems (EMS), commonly referred to as “gigaliners” or “megatrucks.” These vehicle combinations are significantly larger than standard lorries in Europe—measuring up to 25.25 metres in length (nearly 9 metres longer than standard trucks) and weighing up to 60 tonnes. To put this into perspective, an EMS is as long as six passenger cars and weighs as much as a fully loaded Boeing 737-300. In Finland, even more extreme configurations—up to 34.5 metres and 76 tonnes—are permitted.

ETSC has serious concerns about the safety implications of wider EMS use. Until now, these vehicles have only been permitted under strict conditions in a small number of EU Member States. However, the broader safety, infrastructure, and environmental impacts of cross-border EMS operations have not been fully assessed.<sup>11</sup>

Alarming, the Commission’s proposal contains no clear legal safeguards limiting EMS vehicles to specific parts of the road network. Even more concerning is a requirement for Member States to ensure that EMS-approved road networks are connected across national borders. Roads near borders may be ill-equipped to handle the additional risks posed by EMS traffic.

The proposal also fails to set EU-wide minimum training requirements for drivers of EMS vehicles. As it stands, in several Member States, 18-year-olds could be permitted to drive these significantly longer and heavier trucks without any additional qualifications beyond those required for standard lorries - a clear gap in safety regulation.

A 2024 study<sup>12</sup> 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 much better safety record.

Several Member States have raised similar concerns in recent Transport Council meetings. A comparable and equally controversial proposal from the Commission was rejected by the Council in 2014—and the key issues that led to its rejection remain unresolved today.

In March last year, the European Parliament narrowly approved new provisions to expand the use of megatrucks. An amendment to remove these provisions came just six votes short of

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<sup>11</sup> ETSC Press Release (2024) European Parliament Backs Mega-Trucks Big Lorries, Big Mistake <https://tinyurl.com/26nycjuz>

<sup>12</sup> CER Reports (2024) Study on Weights and Dimensions <https://www.cer.be/cer-reports/study-on-weights-and-dimensions>

passing—revealing deep divisions among MEPs. This close vote is significant because it highlights the widespread concerns about the safety, environmental, and modal shift implications of allowing longer and heavier trucks on EU roads. Despite the outcome, nearly half of the Parliament opposed the changes—indicating that the debate is far from settled.<sup>13</sup>

Presently, the Council has yet to reach a consensus on its general approach to the proposal. ETSC calls on the Danish 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.

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

## Closing the Loophole: Reforming Individual Vehicle Approvals (IVA)

In recent years, there has been a sharp increase in imports of large American pick-up trucks such as the Dodge Ram, Ford F-150, and Ford Raptor. These vehicles are typically brought into the EU by private individuals or specialist dealers and are approved for road use through the Individual Vehicle Approval (IVA) process.

However, unlike vehicles that undergo EU type-approval, individually approved vehicles are subject to significantly lower safety and environmental standards. They are exempt from the requirements of the General Safety Regulation and are not included in CO<sub>2</sub> monitoring or target compliance—creating a clear competitive disadvantage for manufacturers that meet EU regulations.

These large pick-up trucks and SUVs are ill-suited to the European road environment. There is no practical justification for allowing their import, especially when a wide range of EU type-approved commercial vehicles is available to meet all use cases.<sup>14</sup>

A major concern is that there is currently **no upper limit** on the number of vehicles that can be approved under the IVA scheme—a significant loophole in Regulation (EU) 2018/858. In contrast, EU manufacturers producing in small volumes have access to a simplified Small Series Type Approval procedure, capped at 1,500 vehicles annually. Beyond that threshold, full type-approval is required.

The lack of a cap under the IVA system has led to its misuse. Thousands of mass-produced vehicles are being imported into the EU while bypassing the safety and environmental standards set out in type-approval legislation. For example, the Dodge Ram has annual sales exceeding 500,000 units in the US alone—far beyond what could be considered a niche or specialist vehicle.

The European Commission's DG GROW is now preparing an update to the IVA requirements, aiming to align them more closely with current EU safety and environmental rules. Under the proposed changes:

Exemptions would be limited to narrow, clearly justified cases (e.g. vehicles adapted for persons with disabilities or for use as ambulances).

Vehicles produced in large series (global annual production >1,500 units) would be required

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<sup>14</sup> Joint letter by Civil Society (October 2023), <https://tinyurl.com/3v9smr8t>. Joint letter (July 2024), Individual Vehicle Approval, and the continued application of the lightest touch to the most lethal vehicles, <https://tinyurl.com/y3pc7wpa>

to comply with most provisions of the General Safety Regulation and EU environmental standards.

ETSC urges the Danish Presidency to fully support the Commission's efforts to close the IVA loophole. Member States should also be strongly encouraged to align their national IVA schemes with the revised EU framework to ensure consistent enforcement across the single market.

There must be a single, high standard for all vehicles used on Europe's roads—without loopholes or backdoors for unsafe and non-compliant imports.

## Trade Agreements Must Not Undermine EU Vehicle Safety Standards

The EU is currently engaged in high-stakes trade negotiations with the United States, with the automotive sector a key area of focus. In light of this, ETSC—together with a coalition of road safety, consumer, and environmental organisations—wrote to Commission President Ursula von der Leyen in March 2025 to express strong opposition to the possibility of recognising US vehicle safety and environmental standards as equivalent to those of the EU.<sup>15</sup>

The concern is clear: US vehicle standards are not equivalent to EU requirements. Critical differences include the lack of mandatory pedestrian protection measures in the US, weaker automation safety oversight, and the absence of many key technologies that are now standard in all new EU vehicles—such as automated emergency braking and emergency lane keeping. Granting equivalence would not only jeopardise road safety in Europe, but also undermine the integrity of the EU single market and create unfair competition for manufacturers that meet higher safety and environmental standards.

The European Commission’s response, delivered by Deputy Director-General Leopoldo Rubinacci on behalf of President von der Leyen, offered important reassurances. The Commission stated unequivocally that EU safety and environmental standards are not up for negotiation. While it confirmed that discussions could include administrative streamlining (such as partial recognition of test results where standards align), it emphasised that regulatory substance would remain intact.

Despite these assurances, ETSC and our partners remain concerned. The potential for regulatory dialogue and administrative easing—particularly under pressure to resolve the current transatlantic trade tensions—carries risks. A shift in focus toward reducing so-called “non-tariff barriers” may open the door to gradual erosion of EU protections, especially in areas where US standards fall significantly short.

ETSC calls on the Danish Presidency to ensure that road safety is treated as a non-negotiable pillar in any trade negotiations. There must be no compromise on the EU’s high vehicle safety standards and no backdoor recognition of weaker systems. The safety of European road users must not be sacrificed for trade concessions.

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<sup>15</sup><https://etsc.eu/president-von-der-leyen-urged-to-reject-us-vehicle-standards-in-trade-negotiations/>

# Assisted and Automated Driving

## Filling the safety governance gap in automated driving – the need for an EU agency

ETSC urges the Danish Presidency to accelerate progress on the creation of a dedicated EU agency for the safety of automated driving—an initiative explored in the European Commission’s Sustainable and Smart Mobility Strategy.<sup>16</sup> While the Commission is currently assessing this prospect, the publication of its findings is long overdue. The upcoming mid-term evaluation of the EU Road Safety Strategy presents an ideal opportunity to release the report and move this important initiative forward.

ETSC believes the new agency should play a central role in ensuring the safe deployment of automated mobility across Europe. One of its core responsibilities should be the type-approval and market surveillance of automated vehicles, ensuring that these technologies meet robust safety standards before and after entering the market.

In addition, the agency should be tasked with collecting data on, and conducting or overseeing, investigations into collisions, incidents, and near-misses involving automated vehicles—including those where advanced driver assistance systems were active. The results of such investigations must be made publicly available to inform evidence-based updates to EU and UNECE regulations. Learning from real-world incidents is essential to building public trust and improving the safety of increasingly automated transport systems.

## Driver assistance is not automation—rules must reflect that

The current international regulations for driver assistance systems are undergoing revision at UNECE’s World Forum for Harmonization of Vehicle Regulations (WP.29). These new standards apply in the European Union and other markets such as the UK and Japan. For ETSC it is critical that these updates address well-documented human factor issues such as driver overestimation of system capabilities, misunderstanding of system limits, and increased engagement in non-driving activities when assistance systems are active.

In early 2024, a new UN Regulation on Driver Controlled Assistance Systems (DCAS) was adopted, representing a welcome step forward in addressing some of these human factor concerns. For example, it strengthens driver monitoring requirements. However, a recent update to the regulation has introduced problematic elements: it now permits drivers to take their hands off the steering wheel on motorways as a comfort feature, and allows the system to initiate and perform certain manoeuvres—such as lane changes—without the driver

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<sup>16</sup> [https://transport.ec.europa.eu/transport-themes/mobility-strategy\\_en](https://transport.ec.europa.eu/transport-themes/mobility-strategy_en)

initiating or confirming them, provided the vehicle is on a motorway and the driver has their hands on the wheel.

Crucially, despite these increasing levels of automation, the driver remains fully responsible for the driving task under current legal frameworks. This creates a dangerous mismatch: the system is controlling more aspects of the vehicle's behaviour, yet the driver is expected to remain vigilant and ready to take over, even though humans are poorly suited to passive monitoring over long periods.

This update reflects a compromise between the voices pushing for expanded DCAS functionalities and those, such as ETSC and some Member States, urging caution due to unresolved safety concerns. ETSC remains seriously concerned about this direction.

Even more troubling are ongoing discussions that go further—considering the extension of hands-off, system-initiated manoeuvres to motorways, and enabling hands-on system-initiated manoeuvres in urban areas. These developments risk amplifying existing human factor issues and further blurring the line between assisted and automated driving. From a driver's perspective, systems that require no driver input for manoeuvres and allow hands-off driving may be indistinguishable from automated driving systems—creating confusion about who is truly in control and responsible.

Placing full legal responsibility on the driver in such situations is not only unfair, but also unsafe. The driver would be expected to monitor and supervise a highly complex system without training and these changes are being suggested despite the ample research showing that humans are not good at supervising automated tasks reliably over extended periods.

ETSC calls on regulators to delay any relaxation of current restrictions—particularly those related to hands-off driving and system-initiated manoeuvres—until real-world safety data becomes available. It is essential to first evaluate whether the assumed human factor improvements built into the current DCAS regulation, such as enhanced driver monitoring, actually lead to safe system use in practice.

This evaluation should be based on in-service monitoring and reporting, as required by the DCAS regulation. Once vehicles equipped with these systems are on the market, manufacturers will be required to report performance data to authorities—data which must be used to inform further regulatory decisions.

ETSC urges the Danish Presidency to take a strong stance:

- Hands-off assistance systems should not be allowed outside motorways.
- System-initiated comfort features—such as system-initiated lane changes—should not be permitted during hands-off driving on motorways or hands-on driving in urban areas.

These steps are vital to avoid undermining road safety and to preserve a clear legal and functional distinction between assisted and automated driving.



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