



European Transport Safety Council

ETSC's Response to the European Commission Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point

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Introduction

Every year, almost 20,000 people are killed on EU roads and around 100,000 more are seriously injured - losses that devastate families and communities and cost the EU economy an estimated 2% of GDP. The EU and its Member States have committed to halving road deaths and serious injuries by 2030, and to approaching zero deaths by 2050 under "Vision Zero." We are now at the midway point of the EU Road Safety Policy Framework 2021–2030, and the European Commission's report - the *Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point* - takes stock of progress and sets out the way forward.

This briefing is the European Transport Safety Council's response to that report. ETSC welcomes the Commission's honest assessment that progress is too slow and that the road safety "toolbox" may not be fit for the challenges ahead. But the report also reveals a worrying gap between the scale of the problem and the ambition of the proposed response, and overlooks a deregulatory trend that risks undermining the 2030 targets completely.

The sections that follow set out where ETSC agrees with the Commission, where the report falls short, and what legislative action, investment and oversight are now needed to get back on track.

Executive Summary

Progress towards the EU's 2030 road safety targets is alarmingly off track. Since the 2019 baseline, road deaths have fallen far short of the trajectory needed to halve them by 2030, and only a couple of Member States are on course. The Commission's mid-point report rightly recognises this, but its proposed response is not commensurate with the scale of the challenge.

ETSC welcomes several aspects of the Commission's review, namely: the new country-level reports; the explicit acknowledgement that political will is too often lacking and that road safety delivers a strong economic return; efforts to embed road safety in the next long-term EU budget; continued support for capacity building through the EU Road Safety Exchange; the commitment to issue guidance to Member States on speed management and on e-scooter safety; and the commitments on connected and automated vehicles, including support for C-ITS deployment and an evaluation of the General Safety Regulation in 2027.

ETSC regrets that the report uses rising vehicle ownership and traffic volumes to explain away the slowdown in reducing road deaths - a justification that the evidence does not fully support.

ETSC considers the report to be missing several critical elements. It stops short of proposing a dedicated EU Road Safety Agency, despite acknowledging that road transport - unlike other modes - has no executive body with a safety mandate and is poorly equipped to oversee the safe roll-out of automated vehicles. It is silent on the road safety risks of the EU-US trade negotiations and on the Individual Vehicle Approval loophole. It does not address the "Automotive Omnibus" and its proposed freeze on safety requirements for small cars and speed-limiter and tachograph exemptions for electric vans. It overlooks measures in the revised Driving Licence Directive that may worsen safety, and the failure to introduce a lower alcohol limit for novice and young drivers. And it offers no concrete new action on drug-driving or driver distraction.

Without a firm timeline for an EU Road Safety Agency, and a reversal of the current deregulatory trend, the 2030 targets will remain out of reach. This briefing sets out ETSC's detailed recommendations across infrastructure, vehicle safety, road use and governance.

Overview: Midway to the EU 2030 Targets

This ETSC briefing responds to the European Commission's *Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point* and sets out urgent priorities for legislative action, investment and oversight.

We are now halfway through the EU Road Safety Policy Framework 2021–2030. The collective objective to halve road deaths and serious injuries by 2030 remains both urgent and achievable. But progress is alarmingly off track. The latest data show that 19 900 people were killed in road crashes in the EU in 2024. This is 440 fewer lives lost than in 2023 - a 2% decrease¹. Since 2019 (the baseline year), the EU27 has achieved only a 12% reduction in road deaths - far below the pace needed to meet the 2030 target.

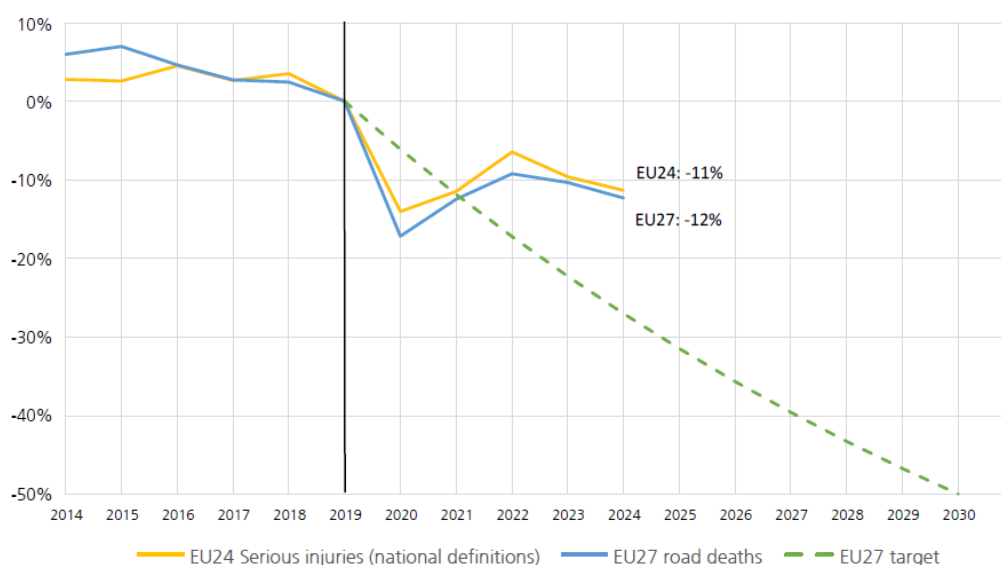


Figure 1. Change in the number of road deaths in the EU27 since 2014 compared with the EU target for 2030 and change in the number of serious road traffic injuries.²

The EC's assessment cites increased vehicle ownership per capita and increased kilometres driven to explain why reductions in deaths have slowed, framing a 2% decrease in 2024 as "a significant achievement" in that context: *'Given the rise in the number of vehicles per person and in the number of kilometres driven, this is a significant achievement, but it also highlights the need for sustained efforts at all levels.'*

ETSC does not accept rising traffic as an explanation for slowing progress. Since the 1970s, motorisation in Europe has risen continuously while road deaths have fallen - often steeply. Decoupling of traffic growth from road trauma is precisely what road safety policy, including successive vehicle safety standards, has achieved. Rising vehicle numbers and kilometres

¹ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point, <https://tinyurl.com/2589sn7z>

² ETSC (2025), Ranking EU Progress on Road Safety, 19th Annual Road Safety Performance Index (PIN) report), <https://tinyurl.com/4sp89wch>

driven are therefore not a mitigating circumstance; they are the very trend that effective road safety policy is designed to outpace. The slowdown since 2019 reflects insufficient action, and this must be recognised.

However, this is not equally true for all road users. Decoupling has been most successful for vehicle occupants and far weaker for vulnerable road users - pedestrians, cyclists and motorcyclists - where progress has largely stalled. According to EC data between 2019 and 2023, pedestrian deaths fell by around 900, but cyclist and motorcyclist deaths each fell by only around 100, and within towns almost 70% of those killed are vulnerable road users.³ This is an argument for stronger action on the protection of vulnerable road users, not for accepting slower progress overall.

The country-level data further undermine the idea that traffic growth explains the slowdown. The road risk indicator - road deaths per distance travelled - gives a more refined picture, and it shows wide divergence between Member States. In Lithuania, Latvia and Denmark, the distance driven increased over the last decade while road deaths fell by more than the EU average. By contrast, in France and Italy the distance travelled has remained essentially flat (a 1% increase over ten years), yet road deaths have fallen more slowly than the EU average (-6% and -10% respectively) - far short of the 50% reduction required over the decade. Where exposure has barely changed, slow progress cannot be blamed on rising traffic; it points instead to insufficient action.

The road risk indicator nonetheless has a built-in limitation: distance-travelled data cover only motor vehicles and omit cycling and walking, and therefore understate the exposure of vulnerable road users. It should be read alongside, not in place of, other measures of road safety performance.

In terms of serious injuries, although a reduction is noted (in 2023 around 100,000 annually, compared with 110,000 in 2019), there is still work to be done in terms of improving serious injury data as stated in ETSC's recent PIN report on the topic.⁴ ETSC welcomes the Commission's new Key Performance Indicators (KPIs) and improved data collection methods, which provide more of the transparency needed to track progress towards "Vision Zero."

Country Reports

The European Commission must continue to fulfil its crucial role of supporting road safety best practice in EU Member States as well as pressing for the adoption of national targets and road safety action plans. The detailed country-level reports and recommendations are also welcome and should form the basis for future reviews.

The European Commission commits to:

- *continuing to support Member States to deal with issues identified in the road safety country reports (accompanying this report), including when such support would be identified by Member States in their national and regional partnership plans for*

³ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point, <https://tinyurl.com/2589sn7z>

⁴ ETSC (2025), Reducing Serious Injuries on European Roads, PIN Flash 48, <https://tinyurl.com/2cryn7etx>

investment and reforms for the financing period 2028-2034⁵.

ETSC Recommendation:

- Further work on improving the quality of the Country Reports and using them as a basis to direct and evaluate funding.

Economic Consequences of Not Addressing Road Safety

The Commission rightly acknowledges that road safety is one of the most cost-effective areas of public policy, delivering a return that far exceeds its cost.⁶ ETSC welcomes this recognition — but the economic case is repeatedly set aside when it comes to the legislative and funding decisions that would actually deliver it.

ETSC Recommendation:

- Ring-fence funding for road safety in EU and national budget lines.

Governance

ETSC urges the Commission to accelerate progress towards a dedicated EU agency for the safety of automated driving - an initiative first explored in the Commission's 2020 Sustainable and Smart Mobility Strategy.⁷ The Commission undertook to assess this prospect, but the publication of its findings is long overdue.

The mid-point report itself acknowledges the gap:

The EU's road safety governance framework is not sufficiently structured to accommodate the wider roll-out of automated vehicles in road traffic, nor to exploit big data for the purposes of road safety action. Executive agencies with safety mandates have been established for other transport modes but there is no common framework to support the monitoring, coordination and technical work needed to safely roll-out automated vehicles on EU roads. This may entail

⁵ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

⁶ A recent Dutch study (<https://swov.nl/nl/publicatie/verkeersveiligheidseffecten-van-2etranchemaatregelen>) estimated that the ratio of costs to benefits in national road infrastructure investments was between 1:7 and 1:2.5. An older report by the Conference of European Directors of Roads summarised the cost-benefit ratios for a range of road safety measures: https://www.cedr.eu/download/Publications/2008/e_Road_Safety_Investments_Report.pdf as cited in European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

⁷ European Commission (2020) Sustainable and Smart Mobility Strategy https://transport.ec.europa.eu/transport-themes/mobility-strategy_en

*a missed opportunity for both road safety and the EU economy.*⁸

In December 2025, ETSC and six major European civil society organisations wrote jointly to Commission President Ursula von der Leyen urging the establishment of a dedicated EU Road Safety Agency. The mid-point report is an ideal opportunity for the Commission to publish its long-promised assessment and move this initiative forward.⁹

ETSC believes such an agency should play a central role in ensuring the safe deployment of automated mobility across Europe. One of its core tasks should be the type-approval and market surveillance of automated vehicles, ensuring these technologies meet robust safety standards both before and after they enter the market.

The agency should also be responsible for collecting data on - and conducting or overseeing investigations into - collisions, incidents and near-misses involving automated vehicles, including those in which driver assistance systems were active. The findings of such investigations must be made public, so that they can inform evidence-based updates to EU and UNECE regulations. Learning systematically from real-world incidents is essential both to building public trust and to improving the safety of increasingly automated transport systems.

⁸ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

⁹ ETSC (2025) Letter to President Von der Leyen on establishing a Road Safety Agency <https://tinyurl.com/bdfa9ew2>

The Way Forward

EU Funds

Funding is the key to implementing road safety solutions and accelerating progress on road safety across Europe, particularly in countries that lag behind in road safety performance.¹⁰ Insufficient funding at local and national level is identified as one of the top systemic challenges continuing to impede progress towards the 2030 road safety goals in the European Commission review.¹¹ Many Member States lack dedicated road safety budgets at national and local level and thus cannot hire qualified staff to design and implement road infrastructure safety projects or to maintain adequate numbers of enforcement staff for instance. Coordinated funding across all levels of government is needed to put in place infrastructure improvements, enhanced enforcement, vehicle safety technologies and education programmes.

In 2025, the European Commission set out proposals - currently under negotiation - for the next long-term EU budget, known as the Multiannual Financial Framework (MFF), covering the seven years 2028-2034.

The current EU Strategic Action Plan on Road Safety is supported by the 2021–2027 EU budget. Going forward it is imperative that EU funds continue to support the implementation of the EU Road Safety Policy Framework 2021–2030 - 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.¹²

A key priority for the new budget period should be improving road infrastructure safety. Any 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.

A recent report by the European Court of Auditors (ECA) 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 collision hotspots, meaning that

¹⁰ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

¹¹ Ibid.

¹² ETSC (2025) EU Multi-Annual Financial Framework <https://etsc.eu/eu-multiannual-financial-framework-2028-2034-funds-for-road-safety/>

opportunities to save lives were being missed.¹³ This must now be reversed in this new MFF round. The ECA report¹⁴ stressed that new prioritisation rules must be introduced to protect and strengthen road infrastructure spending. To date these are still lacking.

One of ETSC's other priorities for funding includes improving urban road safety. ETSC welcomed the new TEN-T 'urban nodes' in the recent revision of the TEN-T Regulation and the requirement for them to adopt Sustainable Urban Mobility Plans (SUMPs), which should also include road safety actions and targets by 2027. EU funds should be available to help cities to implement them. ETSC would welcome funds to be spent on practical, high-impact measures in TEN-T urban nodes, especially for first- and last-mile connections - for example, protected cycle lanes, safer pedestrian crossings, and the implementation of 30 km/h zones where appropriate. These are simple, well-proven interventions.

The new National Regional and Partnership Plans, to be developed by EU Member States must also be sure to allocate sufficient budget for road infrastructure safety improvements. 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 and evaluation of the plans.

Horizon EU Funds for Research

The EU has a global reputation as a centre of excellence and innovation in research and development in road safety. Road safety research should continue to benefit from European funds under the new EU Competitiveness Fund and Horizon Europe Framework Programme. There is a continuing need to ensure the dissemination of knowledge about successful measures (good practice) and research results among decision-makers and practitioners.

Road safety research priorities and approaches under the next Horizon programme:

1. Conduct research on new and improved care and rescue measures to further minimise the long-term effects of road crashes, in particular for children.
2. Improve data collection and analysis including registration of deaths and injuries and tackle underreporting amongst vulnerable road users (VRUs).
3. Prioritise safety improvements to road infrastructure, and harness potential of digital infrastructure (such as digital speed limit maps and analysis of crash data to prioritise treatment of high-risk sites).

¹³ Court of Auditors (2024) Report on Road Safety <https://tinyurl.com/3ssn6n9h>

¹⁴ Ibid.

4. Conduct research on the road safety implications of electrically assisted cycles and e-scooters.
5. Current in-depth information on road crashes stems from limited regions (e.g., Hannover/Dresden in GIDAS, or the Registre du Rhône data in France) and is not representative for all of the EU. EU-wide in-depth information on road crashes involving all road users is needed.
6. Research, test and validate drug testing devices.
7. Fitness to drive.

EU KPIs

The EU's Road Safety Policy Framework 2021-2030 introduced a list of Key Performance Indicators (KPIs) which are being used to measure overall road safety performance. The KPIs were further detailed in the EU Strategic Action Plan on Road Safety.

In an initial phase, eight KPIs formed the basis for monitoring progress in joint road safety work at EU and Member State levels.

Key Performance Indicators can give a more complete picture of the level of road safety than just numbers of road deaths and serious injuries and can help detect the emergence of problems at an earlier stage. Yet more can and should be done to integrate the findings and progress of the KPIs into the EU road safety policy making including also into the analysis and recommendations of the new Country Reports. Furthermore, outcome targets can be set based on the data collected.

The 'Baseline' project, supported by the European Commission and coordinated by the VIAS Institute, was launched in 2020 to produce values for the EU Road Safety KPIs in the 18 Member States participating in the project.¹⁵ In 2023, as a follow-up to the 'Baseline' project, the 'Trendline' project was launched, supported by the European Commission and coordinated by SWOV.¹⁶ In addition to the eight KPIs that had originally been defined by the European Commission, the 'Trendline' consortium also identified and tested on a limited scale, some new indicators.

Financial support from the EU should continue to support this important work in the next budgetary period.

¹⁵ Baseline project, <https://baseline.vias.be/>

¹⁶ Trendline project, <https://trendlineproject.eu/>

ETSC recommendations:

- Set outcome targets where possible.
- Make better use of the KPIs to inform policy.

Road Safety Exchange

The EU Road Safety Exchange (EURSE) helps reduce disparities in road safety performance between EU Member States by supporting the exchange of proven measures, practical experience and expertise. ETSC has been co-ordinating this programme on behalf of the European Commission since 2019.¹⁷ Through cooperation by road safety professionals in road authorities and institutions, the project supports the transfer of successful policies into practical action that reduces road deaths and serious injuries.

The current phase, EU Road Safety Exchange + (EURSE III), is a 25-month European Commission-funded programme that builds on the two previous editions and extends this cooperation to regional and local level. It brings together governments, cities, regions and key stakeholders to share effective approaches in areas such as speed management, infrastructure safety, enforcement, urban mobility and the protection of vulnerable road users, as well as future-oriented topics such as climate resilience and automation, in line with the Safe System approach.

Participants benefit from peer learning, tailored guidance, stronger professional networks and direct exposure to successful road safety models from across Europe. By turning shared knowledge into concrete reforms, EURSE III supports safer roads, safer mobility and progress towards the EU road safety targets.

ETSC Recommendation:

- Set up a permanent funding mechanism for capacity building and exchange of best practice for EU Member States.

¹⁷ EU Road Safety Exchange project Website: <https://tinyurl.com/3eicwhmt>

Infrastructure Safety Management

The European Commission outlines its recent progress in updating the road infrastructure safety legislation 2019/1936. The main changes under the revised legislation include: extending the scope beyond the trans-European transport network roads (TEN-T) to primary roads, more transparency, network-wide risk assessment and strengthening the requirements to protect vulnerable road users. The European Commission also includes the intention to support Member States in incorporating road safety, resilience and operability requirements into road maintenance and upgrade projects undertaken to facilitate military mobility or dual use within the newly proposed budgetary instruments.¹⁸

Around half of EU deaths occurred on rural, non-motorway roads in the EU in 2025, some of these roads will now be in scope for the requirements of the new RISM Directive.¹⁹ EU Member States are currently working to implement these new changes including, performing network-wide road infrastructure safety assessments, based on a risk scaling methodology that helps to better identify crash risks on specific sections of road. This will then result in road safety inspections being targeted at the most dangerous sections and thus help to direct investment to where it is most needed, important for budget allocation.

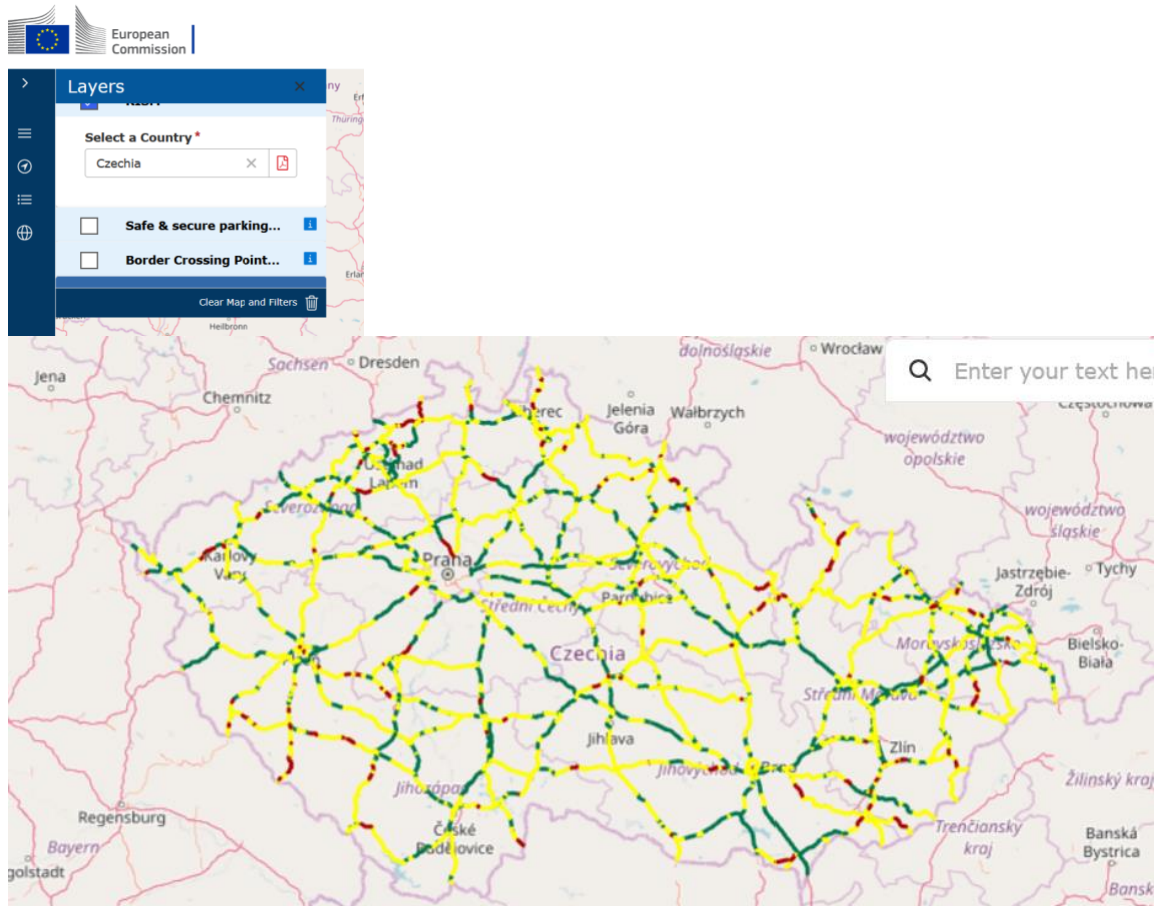
The European Commission has made guidance available to help national authorities carry out their task as well as a map of European countries.²⁰ Each map shows the entire road network covered by the Directive and the results of the new Network Wide Assessment including classification of their safety levels. The map overleaf shows the example of Czechia.²¹

¹⁸ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

¹⁹ ETSC (2024) Reducing Road Deaths on Rural Roads, PIN Flash 46, <https://tinyurl.com/29mwwpmw>

²⁰ TENtec Map Viewers - Explore the TEN-T Network | European Transport Infrastructure <https://webgate.ec.europa.eu/tentec-maps/web/public/screen/home>

²¹ Czech network-wide road safety assessment results: The provided geodatabase comprises the results of the integrated methodology of the network-wide road safety assessment (NWA) conducted on the Czech network of motorways and primary roads. To read the full Disclaimer go to: <https://webgate.ec.europa.eu/tentec-maps/web/public/screen/home>



The European Commission will report to the EP and Council on RISM implementation in 2027 and should then start preparing for the next revision of the Directive. The TEN-T Regulation has also been updated to include new safety requirements for that network including a new standard for introducing separate carriageways for two directions of traffic, with a median barrier, and installing side barriers.²²

ETSC Recommendations:

- Extend the application of the instruments of the RISM Directive to cover all EU co-financed roads, all primary roads including all main rural and main urban roads.
- Support common EU curricula for auditors and inspectors, including specific training on the needs of vulnerable road users (VRUs): pedestrians, cyclists, PTWs, the elderly and road users with reduced mobility.
- Fast-track implementation of planned European Commission guidance on applying the concepts of “self-explaining and self-enforcing roads” and “forgiving roadsides” and apply them beyond the scope of the RISM Directive.

²² ETSC (2023), Member States want to cut the number of EU roads that require safety upgrades <https://tinyurl.com/bd3kex56>

- Apply the standard of separate carriageways for two directions of traffic, by a median barrier and install side barriers, on the TEN-T network.
- Set up the planned European Commission expert group to prepare a road classification network that better matches speed limit to road design and layout.²³

Vehicle Safety

The EU has the exclusive competence to set minimum safety standards for all new vehicles sold on the EU market. These standards, set out in the General Safety Regulation (GSR), were last updated in 2019 and are due for revision in 2027.

The life-saving potential of these updated safety measures was estimated to be 25,000 deaths prevented and 140,000 serious injuries over 15 years. However, some of the technical standards for these measures fell short of expectations due to industry pressure, proclaimed technological immaturity and/or ineffective data privacy rules and could therefore fail to bring the hoped-for safety benefits. Moreover, technological progress since 2019 has evolved rapidly and new promising safety measures are already available on the market. This underlines the urgency for a swift revision of the GSR in 2027 with a view of fixing past missed opportunities and incorporating the most promising new technologies.

ETSC welcomes the new European Commission commitments to:²⁴

- work to accelerate the deployment of advanced safety systems and support the transition to connected and automated vehicles;
- carry out an evaluation of the safety measures of the General Vehicle Safety Regulation in 2027.

Automotive Omnibus

Small electric vehicle safety “freeze”

²³ Action under European Commission (2019) EU Road Safety Policy Framework 2021-2030- Next Steps towards “Vision Zero”. <https://bit.ly/2XXX8Xh>

²⁴ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

To ETSC's regret, the European Commission has proposed a [10-year halt on new safety requirements for small EVs](#), despite 40% of road deaths occurring in the urban environments where these vehicles could still proliferate.

The "Automotive Omnibus" presented in December 2025 reflects sustained lobbying from parts of the car industry. In May 2025, senior executives from Renault and Stellantis publicly called for lighter regulatory requirements for small cars, arguing that this would reduce costs and improve competitiveness against imports. While ETSC supports efforts to make cleaner mobility more affordable, this must not come at the expense of road safety.

ETSC therefore welcomes the European Commission's decision to classify the new "Small Electric Vehicle" (M1E) sub-category within the existing passenger car (M1) category. This approach ensures that these vehicles remain subject to the full current set of EU vehicle safety requirements.

However, ETSC is deeply concerned by the Commission's explicit intention to use this new definition to freeze safety requirements for M1E vehicles for a period of ten years. The proposal justifies this freeze by citing development costs, but fails to adequately consider the real-world operating environment of these vehicles and the societal costs related to road injury.

Small electric vehicles are primarily intended for urban use, precisely where interactions with pedestrians and cyclists are most frequent and where the risk of severe injury or death is highest. Safety technologies such as automated emergency braking with pedestrian and cyclist detection are specifically designed to prevent deaths in these environments. Delaying the application of the latest generation of these systems to vehicles that are most likely to operate in dense urban settings would directly undermine the EU's road safety objectives.

ETSC therefore rejects the creation of a two-tier safety system in which affordable urban vehicles offer reduced protection to people outside the vehicle. Minimum safety requirements must evolve in line with technological progress and proven safety benefits. Instead of lowering standards, ETSC calls for incentive schemes to promote the uptake of smaller, safer vehicles that comply with the latest safety requirements.

ETSC Recommendations:

- Introduce a well-defined M1E category, with clear upper limits on mass (not more than 1.5t), length, width, as well as a defined safe bonnet height and a top speed limit of 120km/h. This could encourage the development of compact but safe electric vehicles. Engineering vehicles to these specifications would provide ample scope for cost-savings.
- Reject a freeze on regulatory safety standards for any vehicle category.

- Keep the established system of giving manufacturers additional time, usually two years, to apply the standards to models already on the market, as it is a fair and balanced approach.

Electric vans and exemptions from speed limiters and tachographs

The Commission proposal includes an exemption from speed limiter requirements for electric vans in categories N2 and N3 with a maximum permissible mass of up to 4.25 tonnes. ETSC strongly opposes this exemption.

Under existing EU law, vehicles in categories N2 and N3 may only be used on the road if they are equipped with a speed limitation device set so that their speed cannot exceed 90 km/h. This requirement reflects the higher risks associated with larger and heavier vehicles and has long been a core element of EU road safety policy.

The Commission justifies the proposed exemption on the grounds that electric vans are heavier than their internal combustion engine equivalents due to the additional weight of batteries. As a result, some electric vans with similar payloads and use cases to lighter vehicles below 3.5 tonnes are classified as N2 and therefore fall within the scope of the 90 km/h speed limiter requirement. According to the Commission, this reduces the attractiveness of electric vans for customers, many of whom are small and medium-sized enterprises, and could slow the uptake of electric vans as well as make it harder for manufacturers to meet CO2 performance targets for light commercial vehicles.

ETSC does not accept this reasoning. Safety requirements should be determined by vehicle mass and risk, not by powertrain type. Heavier vehicles pose greater risks in collisions, particularly to other road users, and this risk does not diminish because a vehicle is electric.

The safety risks associated with vans are well documented. Van traffic has continued to grow rapidly, driven by the expansion of home deliveries and just-in-time logistics, often under significant time pressure. These conditions increase the likelihood of speeding, not reduce it.

ETSC's position is clear and consistent. As a general policy principle, ETSC has long called for all N1 vans to be fitted with a top speed limiter set at 130 km/h. At the same time, ETSC strongly supports maintaining the existing 90 km/h speed limiter for all N2 and N3 vehicles, regardless of whether they are powered by electricity or fossil fuels. Electrification must not be used as a justification to dilute established safety protections.

ETSC Recommendation:

- Delete the proposed exemptions from Regulation (EU) 2019/2144 and Regulation (EC) 561/2006 relating to speed limiters and tachographs for N2 electric vans up to 4.25

tonnes. Maintain existing safety requirements without exceptions based on powertrain.

Trade Agreements Must Not Undermine EU Vehicle Safety Standards

The mid-point report does not mention the EU-US trade deal nor the risks posed by the misuse of the Individual Vehicle Approval (IVA) scheme.

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.²⁵

The concern is clear: US vehicle standards are not equivalent to EU requirements.²⁶ 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. 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 European Commission 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.

Individual Vehicle Approval

One worrying trend is that, while most new vehicles fall under the requirements of the GSR, certain vehicles can instead be approved under the so-called Individual Vehicle Approval (IVA) procedure, which includes fewer safety requirements. ETSC and others have raised concerns over this loophole allowing large American pickup trucks – which are particularly dangerous for vulnerable road users – to bypass safety and environmental regulations.²⁷ Vehicles are also becoming heavier and larger with dire consequences for safety. The European

²⁵ ETSC (May 2025) Joint Coalition Letter to President Von der Leyen (May 2025) <https://tinyurl.com/axyhhve9>

²⁶ETSC (November 2025) Comparative Overview EU-US Vehicle Standards <https://tinyurl.com/2s3ei2rf>

²⁷ETSC (October 2023) IVA Press Release <https://tinyurl.com/4y8y3aht>

Commission is working towards closing the loophole.

ETSC Recommendation:

- Finalise the revision of the rules governing Individual Vehicle Approval schemes to ensure that all vehicles entering the EU comply with all relevant safety and environmental legislation, through updates to the requirements for Individual Vehicle Approval and the relevant type approval legislation.

Connected Vehicles

Connected vehicle technologies can significantly improve road safety, as vehicles can communicate with each other as well as with the infrastructure and warn drivers of upcoming risks. While recognising that their deployment has already demonstrated added value and that the system grows more effective the more it is deployed, the mid-point report highlights that comprehensive EU-wide coverage has still not been achieved, in particular for vehicle-to-vehicle (V2V) services.

The Commission states that it will work to support the transition to connected and automated vehicles and that its initiative to facilitate the creation of cross-border testbeds for autonomous vehicles will enable Member States to further roll out connected infrastructure (including cooperative intelligent transport systems (C-ITS)).

The mid-point report also confirms that the Commission is considering how to best promote the further uptake of C-ITS, including through technical specifications. ETSC would warmly welcome swift adoption of EU rules containing the technical specifications for C-ITS, as they are long overdue. The delegated act that initially set these out was objected to by the Council in 2019 and therefore did not come into force.

However, ETSC calls on the Commission to be more ambitious, as such technical specifications will merely set out the requirements to be complied with in case of deployment. For improving road safety it is important that C-ITS stations and services are deployed swiftly, as notably the V2V services rely on a high penetration rate of vehicles having C-ITS equipment onboard in order for these safety enhancing services to be effective.

The study conducted in support of the 2019 delegated act showed that a mandate for C-ITS in vehicles would significantly increase overall C-ITS deployment, which in turn would significantly improve the road safety benefits from C-ITS.²⁸ With nearly 21,000 road deaths prevented during a 16 year period, the deployment of C-ITS was estimated back then to have

²⁸ Ricardo E&E, TRT & TERP (2018). Support study for Impact Assessment of Cooperative Intelligent Transport Systems. <http://bit.ly/2JDgVGC>

a life-saving potential just shy of the estimate for the revised General Safety Regulation - a regulation regarded as being as important for saving lives as the seatbelt.

ETSC Recommendation:

- Mandate safety-enhancing Cooperative Intelligent Transport Systems (C-ITS) services on all new vehicles in order to accelerate the deployment and safety benefits of C-ITS as well as to ensure that all citizens in Europe benefit from connectivity.

Weights and Dimensions: Extra-Long and Heavy Lorries

In March 2024, the European Parliament voted, with a tiny majority, to support the expansion in the number of extra-long and extra-heavy lorries on EU roads, with serious potential consequences for road safety.

ETSC Recommendation:

- In the context of the revision of the Weights and Dimensions Directive, maintain the current Directive's framework on megatrucks.²⁹

Vehicle Automation

In order for the potential safety benefits of vehicle automation to materialise, it is important that the technology be deployed safely through a robust regulatory framework, which governs pre-approval verification, as well as through market surveillance. Having a central authority responsible for the safe rollout and use of automated mobility across Europe is vital and this should be a task of a dedicated EU road safety agency.

But it is not just about self-driving cars. In the near future, a new generation of so-called "Level 2++" vehicles will begin appearing on European roads. These systems can steer, accelerate, brake and even carry out overtaking manoeuvres without any direct input from the driver. Because vehicles can now initiate complex manoeuvres on their own, many drivers may naturally assume the car is largely in control. Yet by law, full responsibility still rests with the human behind the wheel. Drivers are expected to supervise an increasingly automated system for long periods and intervene instantly when something goes wrong. Decades of human factors research show how unreliable this model is. Automation encourages complacency, slower reaction times and misplaced confidence. When errors occur, they tend to happen suddenly and at speed.

With the EU's adoption of UN Regulation 171 on driver control assistance systems (DCAS), many of the regulatory limits on assisted driving have effectively been removed. This is a

²⁹ ETSC (2023) ETSC Position on Revision on Weights and Dimensions <https://tinyurl.com/2tukxtr5>

profound shift in how cars will behave on public roads. Yet it is happening without a corresponding shift in how Europe monitors safety. While vehicle software has advanced rapidly, Europe's systems for transparency, investigation and public accountability remain largely unchanged. The result is a growing gap between what these technologies can do and what regulators, researchers and citizens are allowed to know about how they perform in the real world.

Without independent monitoring and public data, Europe cannot systematically track problems such as flawed decision logic in dense traffic. Each manufacturer may learn from its own fleet, but there is no single, central authority tasked with monitoring and identifying systemic risks. In effect, the EU is allowing large-scale experimentation on public roads without full transparency on safety.

The mid-point report acknowledges that the EU's road safety governance framework is not sufficiently structured to accommodate the wider roll-out of automated vehicles, and that road transport lacks an executive agency with a safety mandate unlike the other modes of transport.

Regrettably, the mid-point report stops short of recommending the creation of such an agency.

ETSC Recommendations:

- Set up an EU road safety agency that, among other things, prepares draft regulatory requirements for assisted and automated driving systems, plays a role in the type approval process of these vehicles, and coordinates market surveillance. The latter should include mandatory in-depth crash investigations of vehicles with assisted or automated driving systems which the agency should coordinate and/or conduct.
- In the absence of a road safety agency, the European Commission should monitor the real-world safety performance of both assisted and automated driving systems closely.

Road Users

Speeding

The European Commission has promised, for the first time, to issue guidance for EU Member States on speed management and recognises that speed remains the leading contributory factor in road crashes, in its review publication.³⁰ Much of the groundwork has already been completed including what could go into such Guidance³¹. It notes that: ‘excessive or inappropriate speed is involved in 10-15% of all crashes and around 30% of fatal crashes and exacerbates the consequences of all crashes’. It includes an urban focus: “if a pedestrian is hit by a car at 30km/h they have a 90% chance of survival; at 50km/h their chance falls to 20%”. The European Commission also recognises that: ‘while speed remains a politically and culturally sensitive issue, initiatives reducing speed bring significant benefits not just fewer road crashes, fatalities and injuries, but also environmental benefits, with emissions, noise pollution levels and fuel consumption all decreasing’.

The European Commission also cites recommendations issued by the Expert Group on Urban Mobility, focused on protecting vulnerable road users. These favour implementing a speed limit of 30 km/h in urban areas as the measure with greatest impact, followed by developing quality requirements for road infrastructure that serves these groups such as safe pedestrian crossings and segregated walking and cycling paths.

ETSC calls for EU Member States and the EU institutions to prioritise a range of integrated measures that keep road users at safe speeds. These measures include safe and credible speed limits supported by self-explaining and self-enforcing roads (see section on infrastructure), vehicles that help drivers to comply with speed limits, stricter laws, effective traffic law enforcement activities and road user education.³²

ETSC Recommendation:

- Encourage Member States, through a European Commission Recommendation, to apply safe speed limits in line with the Safe System approach for different road types: 30 km/h on urban roads where vulnerable road users and motorised traffic are not physically separated from each other, 70 km/h on undivided rural roads and a top speed of 120km/h or less on motorways.³³

³⁰European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

³¹ Conclusions of European Commission Executive Seminar on Speed and Speed Management. (2020)

³² ETSC (2019) Reducing Speeding in Europe, PIN Flash 36 <https://bit.ly/38ueB1q>

³³ ETSC (2019) Reducing Speeding in Europe, PIN Flash 36 <https://bit.ly/38ueB1q>

Driving Licence Directive

Around 40% of road deaths in the EU occur in collisions involving one or more young drivers or motorcycle riders.³⁴ Improvements to driver licensing could help prevent many of these deaths and injuries.³⁵

The EC's report praises the new rules, which will provide for accompanied driving for young learners. Member States will also have to introduce stricter rules and/or penalties for novice drivers caught drink- and drug-driving but a total alcohol ban for novice drivers was dropped.

ETSC's assessment of the revision of the Driving Licence Directive is more mixed.³⁶ In particular, ETSC expresses concern about giving governments the possibility of introducing accompanied driving schemes for 17-year-old lorry drivers and allowing them to drive solo as of 18 years old instead of 21 currently. Member States will have to report on collisions caused by drivers under professional accompanied driving schemes.

Member States will have until 2030 to introduce accompanied driving and until 2031 for the other changes brought about by this update in the legislation.

ETSC Recommendations:

- Encourage governments to introduce a zero tolerance for drink and drug-driving.
- Monitor impact of allowing EU Member States to introduce an accompanied driving scheme for 17-year-old lorry drivers.
- Monitor impact of allowing EU Member States to further reduce the minimum recommended age for solo driving for bus and lorry drivers to 18 and 19.
- Track and report Member State data on the involvement of 15-year-old B1 licence holders (driving speed-limited cars, up to 45 km/h) in fatal and serious injury crashes.³⁷
- Develop minimum standards for driver training and traffic safety education with gradual alignment in the form, content and outcomes of driving courses across the EU.

³⁴ ETSC (2023) Reducing Road Deaths Among Young People, PIN Flash 41 (2023)
<https://tinyurl.com/547shncj>

³⁵ ETSC Position Revision of the Driving Licence Directive (2022) for full set of Recommendations:
<https://tinyurl.com/mszwsnb2>

³⁶ ETSC (2025) New EU rules on driving licences – the good, the bad and the ugly
<https://tinyurl.com/3i3xvs2m>

³⁷ *ibid*

EU-Wide Effect of Traffic Offences

Increased, effective 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 is fundamental to achieving the EU's 2030 road death and serious injury 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.³⁸

The European Commission also praises the update of the Cross Border Enforcement Directive which is also welcomed by ETSC. The new directive addresses these issues with new provisions improving cooperation between Member States. Besides the automated exchange of information between national authorities, mutual assistance procedures to identify the offender and to enforce fines will be introduced.³⁹

Follow-up for non-financial major offences has also been legislated at EU level for misdemeanours such as drink- or drug-driving. The Member State issuing a driving licence will be obliged to impose a driving disqualification similar to the penalty issued by the Member State in which the offence took place. This is welcomed by ETSC as it will extend deterrence for the non-respect of the rules beyond the cross border enforcement of traffic fines. Regrettably, there will be several exemptions. For example, those banned for excessive speeding abroad can be exempted from a home country and EU ban if they exceeded the speed limit by less than 50 km/h.⁴⁰ Demerit systems are not yet included in this new legislation.

ETSC Recommendation:

- Encourage EU Member States to set up and implement a demerit point system.

³⁸ EC, cited in ETSC (2022) Position on Revision of the Cross Border Enforcement Directive <https://tinyurl.com/2dmrfrbx>

³⁹Final Law on Cross Border Enforcement Agreed, ETSC (2024) <https://tinyurl.com/24kkt6br>

⁴⁰ ETSC New EU rules on driving licences – the good, the bad and the ugly (2025) <https://tinyurl.com/3j3xvs2m>

eScooter Safety

E-scooters have become an increasingly common sight on European roads. Comprehensive data on casualties and vehicle usage is not available, but injuries and deaths are increasing as the sector has grown.⁴¹ In its mid-point Report the European Commission commits to taking action in this area on both the technical standards and road user field. The European Commission says it will 'draw conclusions on the potential benefits of harmonising technical specifications of personal mobility devices.'⁴²

ETSC calls for common EU technical standards for e-scooters which should include, as a minimum:

- A factory-set speed limit of 20 km/h as well as a 250W power limit.
- Anti-tampering measures to prevent use at unsafe speeds.
- Independent front and rear brakes, a minimum wheel size of 30.5 cm, lights, indicators and an audible warning device.

The European Commission has also committed to: preparing guidance to Member States and regional and local administrations on what issues should be taken into account to ensure the safety of riders and other road users during the use of Personal Mobility Devices.

ETSC also calls for EU guidelines for e-scooter users as a template for national regulations:

- A minimum rider age of 16, or an age limit aligned with the minimum age for riding a moped.
- Mandatory helmet.
- A ban on riding with passengers, on pavements, while using a handheld mobile phone and under the influence of alcohol or drugs.

Fitness to Drive: Drink Driving and Drugs

Drink-driving

Drink-driving is highly dangerous and the European Commission recognises it as one of the key risk factors for road deaths and serious injuries. Random roadside breath testing shows high overall compliance with alcohol limits, at approximately 98%. Yet even this seemingly small 2% non-compliance rate translates to roughly five million impaired drivers on EU roads.⁴³ Drink-driving remains the second biggest contributory factor to road deaths after speed.⁴⁴

⁴¹ ETSC, (2024) Improving the Road Safety of e-scooters, PIN Report 47, <https://etsc.eu/improving-the-road-safety-of-e-scooters-pin-flash-47/>

⁴² European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

⁴³ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

⁴⁴ Ibid.

However, the European Commission did not present any new initiatives to reduce drink-driving in its mid-point report. Yet, the EU Policy Framework published in 2019 promised action in this field including developing guidance to Member States on the use of alcohol interlocks. Moreover, under the 'voluntary commitment' section, it called upon public authorities to require the fitment of alcohol interlocks in public procurement.⁴⁵ The European Commission Procurement Directive is up for revision in 2026 and this could be included. Moreover the European Commission promised in 2019 to strengthen the existing EU Recommendation on permitted BAC 2001/115, to extend it to professional drivers and novice drivers. At present 8 EU MSs have still not introduced lower BAC limits for these groups⁴⁶. ETSC regrets that lowering the BAC for novice drivers across the EU was not adopted under the revision of the Driving Licence Directive but also recognises that changes to the CBE directive and the recent inclusion of disqualification under the Driving Licence Directive will bring improvements.

ETSC Recommendations:

- Propose a Directive on drink-driving, setting a zero-tolerance level for all drivers.
- Mandate alcohol interlocks for repeat offenders and professional drivers.
- Seize the opportunity of the revision of the European Commission Procurement Directive to require the fitment of alcohol interlocks in procurement.

Drug-driving

The range of psychoactive substances available for illicit use is widening in the EU and this is further proven by the increased prevalence of illicit drugs in drivers killed in traffic collisions. The EU Policy Framework published in 2019 promised action in this field including encouraging and supporting research under the future research and innovation programme on developing testing methods and cheaper tools for drug detection. It also expressed the intention to develop further drug testing procedures to detect psychoactive substances and establish a common approach amongst all EU MSs so as to enable a KPI to be set in the near future. Regrettably no planned action was presented under the 'way forward' part of the report. Again, here too, follow up after a drug-driving offence across borders will be made easier under the changes to the CBE Directive and new inclusion of disqualification in the Driving Licence Directive.

ETSC recommendations:

- Introduce an EU zero-tolerance system for illicit psychoactive drugs using the lowest limit of quantification that takes account of passive or accidental exposure.

⁴⁵ European Commission (2019) EU Road Safety Policy Framework 2021-2030- Next Steps towards "Vision Zero". <https://tinyurl.com/27h3tzbs>

⁴⁶ETSC Map of BAC Limits EU <https://tinyurl.com/2wxjm8cs>

- Adopt common standards and encourage greater uptake of roadside drug driving enforcement.
- Ensure the classification and labelling of medicines that affect driving ability and support awareness campaigns.

Distraction

In-depth EU crash analyses indicate that driver distraction is a contributory factor in 10–30% of fatal crashes, depending on country and data source⁴⁷. While distraction might be mitigated in the long term by increased automation, urgent action will be required in the period to 2030 to reduce distracted driving in the existing vehicle fleet. Action could also be taken to legislate for manufacturers and service providers to set a ‘car mode’ for electronic devices.⁴⁸ ETSC welcomed the mandatory fitment of distraction warning systems on new types of vehicles from 2024, but regretted that mandatory systems would only detect prolonged gazes towards the lap or feet. The future revision of the General Safety Regulation offers the opportunity to update those requirements so that systems should detect distraction from infotainment systems or mobile phones mounted on the dashboard.

The 2019 EU Road Safety Policy Framework⁴⁹ furthermore intended to take more action in this area which has not been included in the report overview including:

- The proposal to develop a code of good practice with industry to ensure that in-car information systems are designed to allow safe use.
- Encouraging and supporting research on avoiding inattention including distraction by electronic systems integrated in vehicles.

ETSC recommendations:

- Ban use of mobile phones while driving, including hands free.
- Support Member States in developing a camera to detect and enforce mobile phone use at the wheel.
- Encourage telecom companies to develop a driving mode, that will automatically detect that its owner is driving and turn off all notifications.
- Evaluate the impact of distraction of PTW riders and come up with countermeasures.
- Update the rules for the mandatory Advanced Driver Distraction Warning (ADDW) Systems.

⁴⁷ European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point <https://tinyurl.com/2589sn7z>

⁴⁸ An example: <https://apple.co/2w8nurH>

⁴⁹ European Commission (2019) EU Road Safety Policy Framework 2021-2030- Next Steps towards “Vision Zero”. <https://tinyurl.com/27h3tzbs>

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