European Transport Safety Council

Briefing: Road Safety Priorities for the EU in 2026

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

July 2026

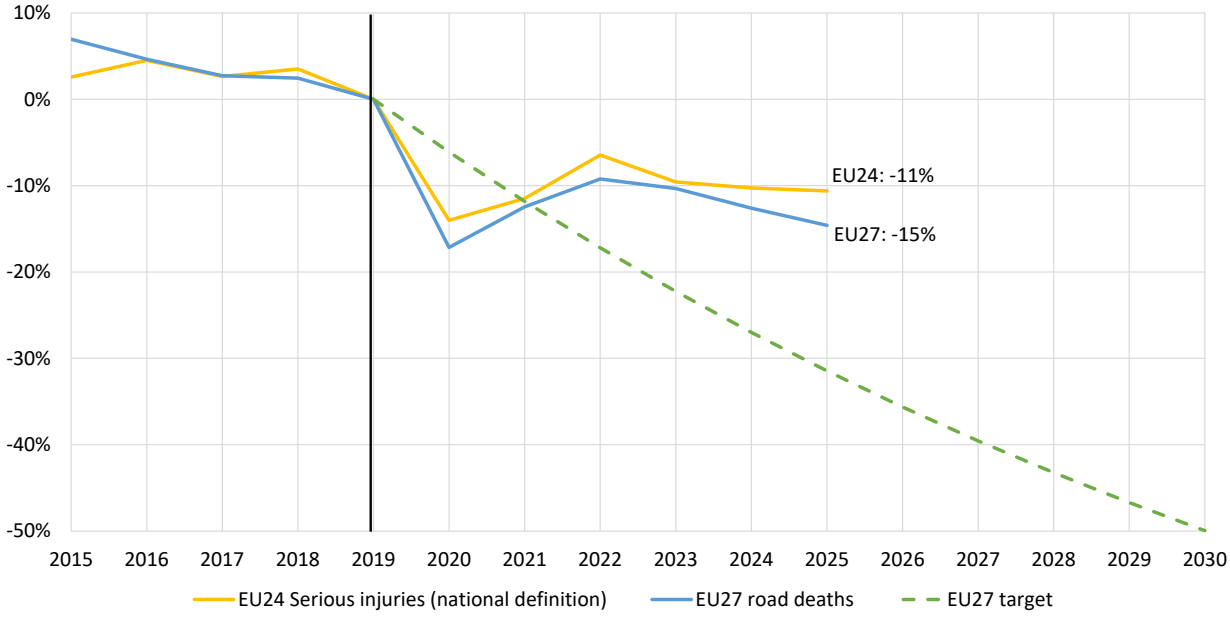
Contents

Introduction

The Irish Presidency of the Council of the European Union, from July to December 2026, 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 Irish 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 2025, there were 19,492 deaths on EU roads. Over the period from 2015 to 2025, the EU27 achieved only a collective 20% reduction in road deaths.[1]



In its first-ever report on road safety, the European Court of Auditors (ECA) warned that the EU and its Member States must "move their efforts up a gear" to stay on track.[2] 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.

[1] Annual Road Safety Performance Index (PIN Report) (2026) https://tinyurl.com/yetn2hyt
[2] https://www.eca.europa.eu/en/news/NEWS-SR-2024-04

At a time when the EU is working to strengthen its strategic autonomy, road safety policy remains a proven European success story. 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.

A proposal to revise EU rules on periodic vehicle inspections is on its way to adoption, and a mid-term evaluation of the EU Road Safety Policy Framework was published in February 2026 with implementation of the key actions much needed. ETSC has outlined its response[3] and a full set of priorities for the 2024–2030 mandate in a separate briefing.[4]

Preparations for the next EU budget are also underway. 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.[5]

The 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.

The Irish Presidency has an important opportunity and responsibility to place road safety firmly back at the centre of the EU agenda. By demanding stronger accountability for results, and ensuring that future EU funding decisions prioritise measures with proven lifesaving impact, the Presidency can help close the widening gap between ambition and reality.

Without renewed political leadership and sustained investment, the 2030 targets will be missed. The Irish Presidency should make road safety a visible, deliverable priority that demonstrates the EU's capacity to act where it matters most.

Mid Term Review

The EU Strategic Action Plan for Road Safety[6] sets a target to halve road deaths by 2030 compared to 2019 levels and, for the first time, a target to halve the number of seriously injured.

---

[3] ETSC (2026) ETSC's Response to the European Commission Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point https://tinyurl.com/7pucu2pz
[4] ETSC (2024) Road Safety Priorities for the EU 2024-2029 https://tinyurl.com/mr4273rp
[5] EC (2019) Road Safety Strategy https://tinyurl.com/49tdbjse
[6] European Commission (2018) Strategic Action Plan on Road Safety https://tinyurl.com/b7m6arwv

We are now at the midway point of the EU Road Safety Policy Framework 2021–2030, and the European Commission's Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point[7] published in February 2026 takes stock of progress and sets out the way forward.

The conclusions of the report are that, while some progress has been made, it is insufficient to reach the targets set for 2030. The Commission promises to take action in five priority areas, including infrastructure safety and intelligent transport systems; helping to strengthen enforcement of road traffic rules and deterrence of poor road behaviour; advancing with the deployment of vehicle safety technologies; addressing new forms of mobility; and prioritising road safety research. Some of the actions that the Commission proposes to take include:

- making road infrastructure investments in the EU conditional upon inclusion of road safety elements;
- issuing guidance for Member states on speed management;
- preparing guidance on ensuring the safety of riders and other road users while using personal mobility devices;
- looking to embed road safety education and awareness raising in other EU funding and outreach instruments;
- expanding capacity-building projects and exchanges of good practice on road safety between authorities at all levels of government.

ETSC has set out its response to this Mid-Point review including priorities for action[8].

On 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.[9] Much of the groundwork has already been completed including what could go into such guidance.[10] 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, deaths and injuries, but also environmental benefits, with emissions, noise pollution levels and fuel consumption all decreasing'.

ETSC is calling on the European Commission to adopt a Recommendation for EU Member States, to apply safe speed limits in line with the Safe System approach for different road

[7] European Commission (2026) Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point https://tinyurl.com/52z3puzm
[8] ETSC's Response to the European Commission Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point https://tinyurl.com/7pucu2pz
[9]European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point https://tinyurl.com/2589sn7z
[10] Conclusions of European Commission Executive Seminar on Speed and Speed Management. (2020)

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.[11]

Also published with the mid-term report were country reports outlining the measures being taken by Member States to improve road safety.[12] These reports show that action is being taken and results are being seen in some member states. Other Member States still have work to do.

However, 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. It does not address the "Automotive Omnibus" and its proposed freeze on safety requirements for small electric cars.

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. ETSC calls on the Irish Presidency, on behalf of the EU Member States, to welcome the EC call to action included in this Mid Term Review and renew efforts to improve road safety, especially in the priority area of tackling speeding.

Enhancing EU Roadworthiness Rules: Extending Checks to All Vehicle Types

A revision of the EU roadworthiness package was published in April 2025. The framework was last updated 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 vehicle registration requirements. With Europe's vehicle fleet ageing and new safety technologies becoming standard, ETSC stresses the urgent need to adapt inspection regimes to today's risk profile.[13]

Both national and EU law require motorists to keep their vehicles in a roadworthy condition. In practice, however, not all vehicle owners do so. Periodic roadworthiness testing exists to ensure that a vehicle's original safety performance, as designed and manufactured, is retained throughout its service life. There is a clear correlation between the severity of collisions and vehicle age and mileage, underlining the need for more frequent technical controls as vehicles

[11] ETSC (2019) Reducing Speeding in Europe, PIN Flash 36 https://bit.ly/38ueB1q
[12] Country Reports can be found here: European Commission (2026) Communication Report on the Implementation of the EU Road Safety Policy Framework at the Mid-Point https://tinyurl.com/2589sn7z
[13] ETSC Position Paper Roadworthiness of Vehicles (Updated 2025) https://tinyurl.com/y5bww7m2

age. Moreover, a recent European Court of Auditors report noted that the flagship EU General Safety Regulation, which applies to all new vehicles sold from July this year, will not deliver the expected reductions in deaths because Europeans are replacing their vehicles less frequently.[14] This ageing fleet makes effective roadworthiness checks even more important. The European Commission has proposed annual roadworthiness testing for vehicles over ten years old, a measure regrettably not taken up by the Transport Council in its December General Approach nor by the European Parliament in May.[15]

Since the law's last revision in 2014, both vehicles and electronically controlled in-vehicle safety systems have developed rapidly, while automated vehicles are beginning to appear on European roads. The Commission proposal states that new mandatory safety technologies, required on new types of vehicles in the EU since 2022, as well as other driver assistance systems, would be subject to regular checks to ensure they continue to function 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 driving systems must also be regularly assessed within the framework of periodic roadworthiness testing to verify their ongoing safety performance.

Beyond maintaining the list of systems proposed by the Commission, the co-legislators should incorporate necessary improvements and corrections in the final legislation, for example by adding several systems mandated under the General Safety Regulation that were omitted from the original proposal. ETSC also calls on the co-legislators to include assisted driving systems in the framework as, since the publication of the proposal, technical requirements have been mandated at EU level for such systems.

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 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

---

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

[15] Transport Council, General Approach (December 2025) https://tinyurl.com/ytps2ra9
ETSC (2026) Roadworthiness vote a missed opportunity for EU road safety
https://tinyurl.com/yrtacwbx

standard. This approach was supported by the European Parliament in their vote in May.[16]

However, under the new Commission proposal, mopeds and motorcycles up to and including 125cc would remain excluded from mandatory testing. The Transport Council has ruled that the current exemption can stay as long as 'alternative measures' are taken such as roadside inspections.[17]

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. These vehicles should also be subject to roadside checks.

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. The EC proposed a 2% target, which ETSC sees as a modest and necessary target given the explosion in delivery traffic. MEPs did agree to phase in roadside inspections for vans, though on a more limited scale than the Commission had originally proposed[18]. However, the Council has replaced this with a target based on 10% of the *number* of Heavy Duty Vehicle (HDV) inspections. [19]

Yet, a simple calculation shows that this represents a 96% reduction in enforcement ambition, effectively giving a free pass to unsafe vans on the road. Moreover, the Council and European Parliament propose that Member States that require annual technical inspections of vans do not need to carry out roadside checks at all.

Random roadside checks are essential to ensuring that vans, which are subject to heavy use, are properly maintained. Including vans in regular roadside inspections is therefore a necessary step toward improving road safety.[20] 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.[21]

ETSC calls on the Irish Presidency to defend the somewhat limited road safety improvements

---

[16] Ibid.
[17] Transport Council, General Approach (December 2025) https://tinyurl.com/ytps2ra9
[18] ETSC (2026) Roadworthiness vote a missed opportunity for EU road safety https://tinyurl.com/yrtacwbx
[19] Ibid.
[20] ETSC Position Paper Roadworthiness of Vehicles. (Updated 2025) https://tinyurl.com/y5bww7m2
[21] Ibid.

within the room left for maneuver in the negotiations which are due to start.

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

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

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

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

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 to ensure safe rollout of assisted and automated driving consistently across the EU and has recently written to President von der Leyen to set this out. [22]

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 accident hotspots, meaning that opportunities to save lives were being missed.[23] This must now be reversed in this new MFF round. The ECA report[24] stressed that new prioritisation rules must be introduced to protect and strengthen this 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 TEN-T Regulation and the need 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

[22] ETSC Joint Letter Calling for an EU Road Safety Agency https://tinyurl.com/bdfa9ew2
[23] Ibid.
[24] Court of Auditors (2024) Report on Road Safety https://tinyurl.com/3ssn6n9h

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 then 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.

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/

Vehicle Safety

Automotive Omnibus and Small Electric Cars

The “Automotive Omnibus” presented on 16 December 2025 reflects sustained lobbying from parts of the car industry. Senior executives from Renault and Stellantis had 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 set of current EU vehicle safety requirements. However, ETSC is deeply concerned by the Commission’s explicit intention to use this new definition to freeze upcoming 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.

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 urges the Irish Presidency to reject the creation of a two-tier safety system in which so-called 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.

Electric vans and exemptions from speed limiters

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 4.2 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 CO_2 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. Exempting electric N2 and N3 vans up to 4.2 tonnes from speed limiters would therefore weaken existing safety standards and introduce an unjustified inconsistency in enforcement.

The safety risks associated with vans are well documented. In 2018 alone, 2,630 people were killed in collisions involving light goods vehicles in the EU, accounting for 11% of all road deaths. 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.

Further reading: ETSC briefing (March 2026), The Automotive Omnibus proposal and the new vehicle subcategory for small electric cars, https://etsc.eu/briefing-the-automotive-omnibus-proposal-and-the-new-vehicle-subcategory-for-small-electric-cars-m1e/

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.[25]

Alarmingly, 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[26] 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.

In March 2024, 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 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

[25] ETSC Press Release (2024) European Parliament Backs Mega-Trucks Big Lorries, Big Mistake https://tinyurl.com/26nycjuz
[26] CER Reports (2024) Study on Weights and Dimensions https://tinyurl.com/3fkx8en4

half of the Parliament opposed the changes – indicating that the debate is far from settled.

The Transport Council adopted its position under the Danish Presidency. Despite road safety and infrastructure concerns raised by several Member States, the file has since entered interinstitutional negotiations.

With the Cypriot Presidency having reached further progress in the trilogue negotiations, including on the EMS provisions, ETSC remains concerned that the final agreement will not include the necessary road safety safeguards and urges policymakers to ensure that any wider use of EMS remains subject to appropriate conditions.

ETSC therefore calls on the Irish Presidency to preserve the road safety safeguards in the final agreement and to ensure that road safety is not compromised in the remaining negotiations.

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_2 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. [27]

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 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).

[27] 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

- Vehicles produced in large series (global annual production >1,500 units) would be required to comply with most provisions of the General Safety Regulation and EU environmental standards.

ETSC urges the Irish 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.[28]

The concern is clear: US vehicle standards are not equivalent to EU requirements.[29] 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 its 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 Irish 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.

[28] https://tinyurl.com/axyhhve9
[29] https://tinyurl.com/2s3ej2rf

Assisted and Automated Driving

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

ETSC urges the Irish Presidency to accelerate progress on the creation of a dedicated EU agency for the safety of automated driving. Road safety and automation will be the focus of the planned Informal Council Meeting this autumn. 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.

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 preparing draft regulatory requirements for assisted and automated driving systems and playing a role in the type-approval process of these vehicles.

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 assisted driving 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 have been revised 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, recent updates to the regulation have 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 initiating or confirming them.

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.

These updates reflect 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.

Discussions on the "DCAS" rules – including a concerning possible extension of hands-off, system-initiated manoeuvres on all road types – were paused at WP.29's task force responsible for the rules, to await data and experiences of the currently allowed DCAS implementations.

However, on 10 April, the Dutch vehicle authority RDW granted provisional EU type-approval to Tesla's "FSD (Supervised)".[30] This system introduces a form of hands-off driving combined with system-initiated manoeuvres on all road types, including urban areas.

In addition to the previously mentioned concerns regarding the technology, ETSC also expressed its objections from a policy making perspective. The provisional approval in the Netherlands was issued under Article 39 of Regulation (EU) 2018/858, an exemption procedure for technologies not compatible with harmonised EU rules. For the system to be used across the EU, the Commission must adopt an implementing act authorising the approval, requiring a vote in the Technical Committee – Motor Vehicles (TCMV).

Under Article 40, an authorisation then obliges the Commission to bring the underlying UN Regulation, in this case UN Regulation No. 171 on Driver Control Assistance Systems (DCAS), into line.

In other words, the TCMV vote is not on a narrow technical question. It will effectively decide whether hands-off driving combined with system-initiated manoeuvres in urban and rural environments, a step well beyond what is currently allowed and beyond even the round of DCAS rules recently adopted in Geneva, becomes the European norm. And the TCMV operates in private, with no formal route in for civil society, road safety experts, or anyone else outside the room.

ETSC had written to Executive Vice-President Séjourné with two demands: that the Commission convene open discussions on whether expanding DCAS to hands-off driving in non-motorway environments is desirable at all; and that no implementing act be put to the

[30] ETSC. (2026). Tesla approval pushes Europe towards a road safety cliff edge. https://tinyurl.com/3n3cns8s

TCMV until that public deliberation has run its course.[31]

Given the pause at UNECE level, the European Commission is now organising discussions on the future of the DCAS rules at EU level. ETSC reiterates that those public discussions on the desirability of expanding the DCAS rules to allow for hands-off driving with system-initiated manoeuvres on roads outside of motorways should be concluded prior to a vote in the TCMV on the act authorising or rejecting the approval of Tesla's FSD (Supervised).

ETSC urges the Irish Presidency to take a strong stance especially given that road safety and automation are one of the focal points of their Presidency:

- Unless evidence demonstrating the functionalities contribute to improve road safety is made publicly available and public discussions are concluded, hands-off assistance systems that can initiate manoeuvres themselves should not be allowed outside motorways.

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

[31] ETSC. (2026). Letter: Ensuring transparent and inclusive EU policy making for assisted driving systems. https://tinyurl.com/mrymc8he

Mandating ABS on all Motorcycles

Nearly 3,500 motorcyclists are killed on European roads every year[32] and motorcycle user deaths are declining significantly more slowly than other road deaths.[33] This underlines the urgent need for more measures that improve the safety of motorcycle users to be implemented, including improvements to vehicle safety standards.

Anti-lock braking systems (ABS) on motorcycles have been investigated empirically and, on average, were found to reduce collision involvement by about 30%.[34] Regulation (EU) 168/2013 on the approval of L-category vehicles mandates ABS only for the L3e-A2 and L3e-A3 categories of motorcycles, but not for the L3e-A1 category. That Regulation also requires the European Commission to examine the mandatory fitting of an ABS for the L3e-A1 category of motorcycles and to consider presenting a legislative proposal.

The study commissioned to examine extending mandatory fitment to the L3e-A1 category recommended that, given the relatively low cost (predicted at 60.7 million EUR), and the potentially significant associated benefits (predicted to be 1.4 billion EUR; a benefit to cost ratio of 22.79), ABS should be made mandatory for all new motorcycles.

That study was published in 2020 and the follow-up legislative action by the European Commission to mandate ABS for the L3e-A1 category is therefore long overdue. Meanwhile, Europe is falling behind India and ASEAN on this key lifesaving technology, as India moved forward with mandating ABS on all powered two-wheelers above 50cc, as from 2026.[35] Additionally, Singapore took a similar step by making ABS mandatory on all motorcycles from 2027 onwards.[36]

At the Motorcycle Working Group meeting in April 2026, the Commission indicated that a targeted revision of Regulation (EU) 168/2013 containing only the ABS mandate was unlikely, citing the requirement for an impact assessment and limited resources.

ETSC therefore urges the Irish Presidency to call on the European Commission to bring forward a single legislative proposal addressing the changes to Regulation (EU) 168/2013 that it

---

[32] European Commission. (2025). Road Traffic Fatalities in the EU in 2023. Collision Matrix. https://tinyurl.com/5dzwuayd

[33] The reduction of motorcycle user deaths between 2011 and 2021 was ~20%, compared to ~45% for moped user road deaths and ~33% for other road deaths. Source: ETSC (2023). PIN Flash Report 44. Reducing road deaths among powered two wheeler users. https://tinyurl.com/3wb95c3y

[34] Ibid.

[35] Times of India. Transport ministry approves mandatory ABS in all 2-wheelers, 2 helmets with new bikes. Reported on 18 June 2025. https://tinyurl.com/5n6tn6mk

[36] Land Transport Authority Singapore. All new motorcycles registered from 1 April 2027 to Have Anti-Lock Braking System. 16 September 2025. https://tinyurl.com/59djkexm

identifies as requiring little preparation – including the ABS mandate for L3e-A1 motorcycles. Bundling these short-term measures would justify the administrative resources required while ensuring that they are not delayed by the lengthier full review of the Regulation.[37]

[37] ETSC (2026). Position Paper: Mandating ABS on All Motorcycles. https://tinyurl.com/43sdjzus

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

Follow us on Bluesky https://bsky.app/profile/etsc.eu

The European Transport Safety Council is the independent voice for road safety in Europe. We are a non-profit international organisation, with members from across Europe, dedicated to reducing deaths and injuries in transport.

Founded in 1993 in Brussels, we provide an impartial source of expert advice on transport safety matters to the European Commission, the European Parliament, international organisations, and national governments.