



To: EU Member State Ministers of Industry/Competitiveness and Ministers in charge of road safety

Cc: European Commissioner for Internal Market, European Commissioner for Transport
National representatives to the Motor Vehicle Working Group

24 November 2020

Dear Minister,

Last year, your country, as a member of the Council of the European Union, gave the green light to a new set of world-beating vehicle safety standards for the European Union, due to come into force from 2022.

These standards are absolutely essential to meeting the EU target to reduce deaths and serious injuries by half by 2030. This target was also central to the Stockholm Declaration on Road Safety adopted by the 3rd Global Ministerial Conference on Road Safety in February.

We are writing to draw your attention to the risk of a dramatic weakening of the EU's new vehicle safety standards in a draft delegated act on Intelligent Speed Assistance (ISA) prepared by the European Commission as part of the technical implementation of the new Regulation. An [updated version](#) of the draft delegated act was presented to Member States at the EU Commission Working Group on Motor Vehicles on 9 November.

Inappropriate speed is still one of the biggest killers on our roads. Around a third of fatal collisions involve at least one party driving at an inappropriate speed, with cyclists and pedestrians being particularly susceptible.

Intelligent Speed Assistance (ISA) is a key technology for helping drivers avoid speeding, and, if implemented correctly, could eventually reduce road deaths by 20% - a game-changer. But the proposed draft delegated act would allow carmakers to fit a much less effective system than the one envisaged in the legislation.

No evidence that a “cascaded acoustic warning” is effective

Instead of requiring the use of a truly effective ISA technology that actually assists with speed compliance through feedback on the accelerator itself, or by limiting engine power, the Commission's draft delegated act proposes also allowing “cascaded acoustic warnings”.

There is no research basis for such a system – seemingly going against the Commission's own “better regulation” agenda - and neither was it considered during the preparatory stages of the legislation.

The evidence for audible speeding alerts in general is that they are annoying and therefore likely to be switched off. [Research carried out for ETSC](#) by the Institute for Transport Studies at the University of Leeds found audible alerts to be the most annoying ISA type. Research by ACEA, representing vehicle manufacturers, found that drivers would be 90% likely to switch off such a system.¹

¹ See ACEA research cited in TRL interim report for the EC, p. 74 <https://bit.ly/3hGIUmw>

It is also obvious that an acoustic system will be ineffective for those that are hard of hearing or deaf - a particular concern amongst older drivers.

At the expert meeting on 9 November, officials from France, Germany, Italy and Sweden said that they supported the draft proposal. Germany and Sweden suggested that they would also like to see an even weaker speed limit information function as an option instead of ISA. TRL, consultants to the Commission, have estimated that fitting a speed limit information function instead of an ISA system would lead to 1300 extra deaths a year in the EU.

We believe that the Commission should only allow ISA systems where evidence of effectiveness is available; 'effectiveness' being a requirement of the legislation. Effectiveness must also include acceptance by drivers - not a system that is highly likely to be deactivated due to annoyance. According to the evidence, the best available options are either "haptic feedback", which uses increased resistance on the accelerator pedal, or a "speed control function" which limits engine power. These systems are already found on many cars on the market today, including from Ford, Volvo and other brands.

No single-step total deactivation of the system

Our second concern with the proposed legislation is that, although the system would be on at the start of every journey, it could be deactivated completely for the rest of the drive with the flick of a switch. We believe that the system should be temporarily overridable until a new speed limit is detected (to allow the driver to respond to an incorrect speed limit) - but total deactivation for the rest of the journey should only be possible when the vehicle is at a standstill, through a sequence of actions. This would furthermore ensure for consistency with the switch-off procedures for other driver assistance systems such as advanced emergency braking systems.

Very high standards of accuracy for speed limit detection rates needed

Our third concern with the draft legislation is that the proposed accuracy rates for speed limit detection are too weak. High accuracy will also be essential to driver acceptance of the system. The draft delegated act only requires 90% of compliant signs to be detected. Non-compliant signs, i.e. damaged or partially covered, will not have to be detected, meaning that the overall real-world performance of ISA systems may be significantly lower. [We therefore recommend](#) that 99% of compliant explicit speed signs be correctly interpreted by the system, together with 95% of compliant implicit speed signs (such as those indicating that you are leaving an urban area) and 95% of compliant conditional speed signs (such as those with speed limits for certain times of day or specific categories of vehicle).

We urge you to help ensure that these concerns are taken on board during the upcoming discussions on the delegated act, so that this legislation can be as effective as was intended. We would like to see your government speak up in support of an effective system that actually saves lives, and not stand by as the standards are weakened.

Yours sincerely,

Antonio Avenoso, Executive Director, European Transport Safety Council (ETSC)

Anna-Lisa Boni, Secretary General, EURO CITIES

Professor Oliver Carsten, University of Leeds, UK

Jeannot Mersch, President, European Federation of Road Traffic Victims (FEVR)

Stephen Russell, Secretary General, ANEC – The European consumer voice in standardisation

William Todts, Executive Director, Transport & Environment

Karen Vancluysen, Secretary General, POLIS Network - Cities and Regions for Transport Innovation

Geert van Waeg, President, International Federation of Pedestrians

David Ward, President, Towards Zero Foundation

Jill Warren, CEO, European Cyclists Federation (ECF)