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IRU position on the IMPLEMENTATION OF THE EUROPEAN COMMISSION ROAD SAFETY ACTION PROGRAMME 2011-2020

unanimously adopted by the IRU Liaison Committee (CLTM) in Brussels on 29 September 2010

IRU Position on the implementation of the European Commission Road Safety Action Programme 2011-2020.

I. ANALYSIS

The European Commission adopted, on 20 July, the so-called EU Road Safety Action Programme 2011-2020 (COM(2010)389) which aims to cut road fatalities in Europe by half in the next decade. The programme sets out a mix of initiatives focusing on improving vehicle safety, infrastructure safety features and road users' behaviour, and includes the introduction of new active safety equipment in vehicles, the building of safer infrastructure, the boosting of smart technology, the strengthening of training and education for road users, better enforcement, establishing a road injuries target and creating a new approach for motorcycles.

Indeed for the road transport sector, road safety has always been, is and will remain a top priority issue and for true professionals every accident is one accident too many. In fact the road transport sector even made a public commitment in support of the UN Decade of Action for Road Safety, in which the IRU Presidential Executive on 24 February 2010 has allocated 2 million US\$ to implement appropriate projects to effectively improve commercial road transport safety provided that this important commitment by the profession is matched by credible partners involved in the promotion of road safety or by the international donor community.

Recent scientific studies such as the European Truck Accident Causation (ETAC) Study highlight that the main cause of an accident involving trucks is "human error" (85%), and confirm the European Commission's analysis in this respect. The proposed initiatives to achieve the seven strategic objectives of the EU Road Safety Action Programme can in this respect contribute to reducing human error. However, a number of points of particular concern for commercial road transport need to be raised.

Out of 85% of the accidents involving trucks, 75% are caused by road users other than the truck driver. The recommendations of the ETAC Study stress that **knowledge transfer and training**, of both professional drivers e.g. as provided by the IRU Academy, and of private car users in awareness on how to interact with heavy commercial vehicles are crucial. In this

respect, further developing and promoting training and providing training institutes with the necessary training programmes and modules, to ensure that all drivers are properly trained to perform the best possible safety record, are essential to effectively target the main cause of all accidents involving trucks and can significantly decrease the number of road accidents.

It is important that the European Commission and Member States pursue the research initiated by ETAC, using the methodology it established, to ascertain the best solutions to reduce accidents involving trucks.

It is a positive development that the European Commission wishes to focus on **active vehicle safety** equipment, such as electronic stability control, lane departure warning systems, automatic emergency braking systems, seat belt reminders, speed limiters for light commercial vehicles and optional driver assistance systems. It should be noted, however, that only in 5% of all accidents involving heavy commercial vehicles the main cause is linked to technical failure.

A lack of harmonisation in **roadworthiness testing procedures** in the Member States and the absence of mutual recognition of testing certificates have obliged transport operators to recall vehicles to the country of registration for periodical testing and have led to additional unnecessary costs up to 1500 Euros per vehicle and to a significant negative environmental impact in cases where these obligatory returns could not be properly planned and had to be done empty.

Effectiveness of road safety policies largely depends on the intensity of **enforcement**. Despite increased efforts by the European Commission (cross-border road safety enforcement) and control authorities of the Member States, there is still a heavy administrative burden attached to enforcement, especially for infringements committed abroad, as well as a lack of information on rules applicable in the Member States and on sanctions and penalties. A slow penetration of reliable technological tools also hampers the simplification of enforcement.

Inadequate infrastructure is the main cause of an accident only in 5% of all accidents involving trucks. However, **safe road infrastructure** is of general importance for road safety. This does not count only for roads, bridges and tunnels but is equally necessary for auxiliary infrastructure such as safe and secure parking areas for trucks. Currently, there is an insufficient number of safe and secure parking areas for trucks which hampers drivers' ability to meet social rules. In most countries, drivers and operators often face problems finding parking spaces in overcrowded parking areas. This can have a negative impact on road safety. In addition, parts of the secondary road network, such as round-abouts, have often not been designed for heavy commercial vehicles such as trucks, buses and coaches.

Targets to reduce the number of injuries can best be reached through the implementation of the recommendations of the ETAC Study and by promoting and increasing the use of collective transport by buses, coaches and taxis which would, in itself, significantly reduce the number of fatalities and serious injuries, since collective passenger transport by buses and coaches, as well as taxis, have significantly better safety records than private cars. As a matter of fact, doubling the use of buses and coaches in the EU alone can lead to a reduction of fatalities on European roads by 3000 per year.

There is a risk that **event data recorders** do not ensure that the appropriate level of confidentiality of commercial data exists when used in multimodal transport chains.

II. IRU POSITION

Road safety has always been, and will remain, a top priority issue for the road transport industry. For true professionals, every accident is one too many.

The IRU and its Member Associations support any measure that effectively increases road safety and welcomes the EU Road Safety Action Programme 2011-2020 which is in line with the safety commitment of the road transport industry.

The IRU urges the European Commission to start preparing non-legislative and legislative measures to implement the new Road Safety Action Programme which should contain the following actions to be taken in order to contribute to the reduction of accidents and their severity:

- Further encourage preparatory and continuous professional driver training and awareness building for other road users on how to interact with heavy commercial vehicles as it is scientifically proven that out of all accidents involving trucks, 85% are caused by human error, and out of these 85%, 75% are caused by road users other than truck drivers. As such training should be the top priority of the new European Road Safety Action Programme 2011-2020.
- Pursue research initiated by the ETAC study using its methodology in order to ascertain which are the best solutions in order to reduce accidents involving trucks.
- Actively support the IRU Academy and IRU Member training organisations that strive to constantly improve road transport training standards and seek to facilitate this knowledge transfer through a network of accredited training institutes throughout Europe.
- Encourage manufacturers to provide proven **active and passive safety systems** in their vehicle before they become mandatory by law although technical failure is only in 5% the main cause of an accident involving heavy commercial vehicles
- Table a legislative proposal aimed at harmonising Member States **roadworthiness testing** procedures and establishing a system of mutual recognition of certificates.
- Encourage EU Member States to **harmonise enforcement** and, in particular, provide good information about the rules in force, harmonise sanctions and penalties and reduce the administrative burden.
- Encourage EU Member States to establish more (secure) parking areas for trucks, communicate their location to the IRU or ITF and include their financing in the TEN-T road infrastructure projects funding.