

Brussels, 22 November 2005

IRU position on ANTI BLIND SPOT SYSTEMS

IRU Position on the European Commission's initiative to draft a Directive on the type approval of devices for indirect vision for all commercial goods vehicles above 3.5 tonnes.

I. ANALYSIS

- On 10 November 2003, the European Parliament and Council adopted Directive 2003/97/EC on rear view mirrors and supplementary indirect vision systems for new commercial vehicles. This Directive aims to improve the visibility of drivers of buses, coaches and trucks by increasing the obligatory field of vision and by reducing the blind angle.
- Directive 2003/97/EC came into force on 26 January 2004. From 26 January 2006 Member States must refuse to grant EC type-approval or national type-approval for vehicles or devices for indirect vision if they don't comply with the Directive requirements. It is assumed that by the end of 2006, all new buses, coaches and trucks will be fitted with the new systems.
- The IRU, considering road safety as a priority issue, welcomed this Directive. It is an improvement in the field of road safety, especially since it addresses the concerns of the most vulnerable road users, namely pedestrians and cyclists (see IRU position CDLS/B1982).
- In its Road Safety Action Programme of 12 September 2001 the European Commission announced that, in connection with the Directive on blind spot mirrors for new vehicles, it would also assess the benefits and costs from a Directive for the retrofitting of such systems to existing vehicles.
- A study has been undertaken by consultants Jacobs Consultancy on behalf of DG TREN (see http://europa.eu.int/comm/transport/road/publications/projectfiles/mirrors_en.htm). The forecast of fatalities saved are, according to the study:
 - highest for heavy goods vehicles, followed by light goods vehicles, with buses and coaches the smallest;

- higher for Class IV/V mirrors than for Class VI mirrors (Class IV is a “wide-angle” mirror, Class V is a “close proximity” mirror and Class VI is a front mirror) ¹ (see Annex I for an overview of mirrors under Directive 2003/97/EC).
- Results of the cost benefit analysis in the study showed that fitting of side view mirrors to heavy goods vehicles seems to be justified. Buses and coaches were not seen to be such a problem as statistics show few “blind spot” accidents between buses/coaches and pedestrians/cyclists. Moreover, those accidents that do occur tend to be less serious. It was also mentioned that, as the average age of the HGV’s fleet is 8 years in the EU 15 and 12 years in the new Member States, it would take too long before all trucks were fitted with these safety devices.
 - This above mentioned assessment study estimated the benefits to be approximately four times higher than the costs for the retrofitting of lateral blind spot mirrors to existing goods vehicles over 3.5 tonnes.
 - In this context, the IRU wants to draw to the attention of the European Commission the following facts:
 - Launching a retrofitting Directive before the first safety effects of Directive 2003/97/EC can be really measured, seems premature.
 - Vehicle manufacturers recently came to terms with the Directive requirements but have given little thought to retrofitting. Actual information gathered so far is that the new generation of mirrors can be retrofitted to some of the existing brackets but not on all brands of vehicles. Volvo, for example, has an integrated mirror housing for both existing mirrors. Therefore it is impossible to fit mirrors with wider view and different dimensions. Retrofitting is also technically more complicated on Scania and Ford vehicles because of the current mirror housing design. Consequently, the replacement costs will also be higher for those brands (average of €300/truck when mirror housing does not allow wider view) in comparison to other brands (average of €150/truck on Daimler Chrysler, Iveco and MAN vehicles).
 - There are more than 20 approved systems which can be divided into five fundamental different types: an external mirror mounted on the front of the vehicles (the DOBLI mirror), an internal mirror (the BDS), standard main and wide angle mirrors that rotate around the mounting pillar (the AVS system), an extra wide mirror (300mm) mounted on the pillar and a camera system meeting the required technical standards. All existing and future innovative systems should be allowed.
 - The European Commission only made a cost-benefit analysis of blind spot mirrors. The cost-effectiveness of other systems reducing the blind angle should also be investigated in order to define the most cost effective measure for improving road safety. An example is the LEXGUARD system, an active alert system which uses a strip of rubber on the front and the right hand side of the vehicle making a noise and triggering a flashing light in the cab in the case of danger. The use of a standard wide-angle lens that works on the Fresnel principle, widening the cone of the driver’s field of vision is also worth investigating.
 - The new Directive would focus on replacing the existing side mirrors on existing trucks and not on the performance in covering the prescribed field of vision. The prescribed field of vision however may also be attained by other technical equipment, like a camera/monitor system. Excluding camera systems would result in a

¹ No assessment was made of the detailed technical feasibility of retrofitting “new generation” mirrors because these mirrors are still being designed and are largely specific to different manufacturers.

punishment towards pro-active EU Member States in which there already exists a legal obligation for retrofitting existing vehicles with systems eliminating the blind spot by means of a mirror or a camera system. This is the case in the Netherlands, Belgium and Denmark.

- The blind spot of particular concern is that on the near-side. However, even in the case of retrofitting there will still remain an area of no visibility or impaired visibility on the off-side and at the rear of the vehicle (see Annex II).
- Improving road safety implies more than imposing new safety measures. Fundamental in the discussion on the blind spot angle, where we are talking about the vulnerable road users - pedestrians and cyclists - is safety awareness. Instead of retrofitting existing trucks with a dead angle mirror, the attention of EU Member States should be focused on awareness campaigns funded by authorities at national, regional and local level, to warn and familiarise pedestrians and cyclists with the blind spot area of trucks turning right.

II. IRU POSITION

For the IRU every road transport victim is one victim too many. In this light, the road transport industry has made significant achievements in improving road safety.

However, industry resources are limited. This is why further improvements should be focused on targeted measures based on reliable causal statistics. As such, any new policy measure aiming at improving road safety should be based on the results of the joint IRU/EC truck accident causation study. As long as this study is not finalised, any decision on new road safety measures would be premature as the main accident causes are still unknown.

In addition, the IRU is not in favour of retrofitting mirrors on existing vehicles as vehicle design may cause fitting problems. Other existing systems to reduce the blind spot angle have to be investigated as they may be more cost-effective than the retrofitting of mirrors.

Finally, rather than concentrating on retrofitting to reduce the number of blind spot accidents, policy should focus on training other road users on how to share the road safely with heavy goods vehicles. Awareness campaigns for pedestrians and cyclists, funded by governments, are necessary.
