

**THE ROYAL SOCIETY FOR THE PREVENTION OF ACCIDENTS  
RoSPA**

**RESPONSE  
TO THE DTLR'S INVITATION TO COMMENT  
ON THE EUROPEAN COMMISSION PROPOSALS  
FOR SPEED LIMITERS ON COMMERCIAL VEHICLES**

**24 SEPTEMBER 2001**

## **European Commission Proposals on Speed Limiters for Commercial Vehicles**

### **GENERAL COMMENTS**

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the Department for Transport, Local Government and the Region's invitation to comment on the European Commission proposal for Speed Limiters on Commercial Vehicles. RoSPA welcomes the invitation to comment, and our response has been prepared following consultation with RoSPA's National Road Safety Committee.

In Great Britain, speed limiters are currently required to be fitted to goods vehicles, buses and coaches weighing 7.5 tonnes or more. However, as the DTLR's paper notes, there is no clear evidence to show how many accidents have been prevented by fitting top-speed limiters to these vehicles. Although, it seems likely that this measure has helped to reduce speeds, and so helped to reduce casualties, it is unfortunate that the effectiveness of top speed limiters on large vehicles has not been properly evaluated.

This lack of evidence also makes it difficult to assess the likely road safety benefits of the EC's proposal to extend this requirement to lighter HGVs, buses and coaches and to midi-coaches and minibuses. We also note that the fitment of top speed limiters may reduce speeds on trunk roads and motorways, but will have no effect on urban roads, or roads through rural towns and villages, which have lower speed limits, and where driving at inappropriate speed (rather than excessive) speed is the problem.

The Regulatory Assessment shows that speeding by large vehicles is still a serious problem. Despite the existing requirement for top-speed limiters on the heaviest vehicles, over 80% of HGV's and 50% of coaches and buses exceed the speed limits on dual carriageways, and on single carriageways well over 60% of HGVs and 23% of buses and coaches exceed the limits.

Therefore, while RoSPA would support the measures proposed, we do not believe that they will have any significant effect on casualty reduction.

RoSPA believes that the ultimate aim should be to have intelligent speed limiters fitted to all road-going vehicles, including cars, although this is clearly a long-term aim that will depend on the results of on-going research and trials.

## **SPECIFIC COMMENTS**

### **QUESTION 1.**

***What is the most appropriate lower weight threshold (or other criterion) above which to require that top-speed limiters be fitted to goods vehicles?***

RoSPA supports the EC proposal to require top-speed limiters to be fitted to HGVs of between 3.5 and 7.5 tonnes weight, but as one phase of the longer term aim of all vehicles being fitted with intelligent speed limiters.

### **QUESTION 2.**

***What are the most appropriate criterion (weight or otherwise) and lower threshold above which to require that top-speed limiters be fitted to coaches, buses, midi-coaches or minibuses?***

RoSPA supports the EC proposals to require top-speed limiters to be fitted to minibuses and midi-coaches, but again sees this as a one phase of a long-term aim of all vehicles being fitted with speed limiters.

### **QUESTION 3.**

***At what level or levels should the maximum speed be specified for each category of vehicle to which top-speed limiters would be required to be fitted?***

If implemented, RoSPA believes that the new speed restrictions for minibuses and "midi-coaches" with more than 8 passenger seats should be the same as the lower limits that already apply to larger coaches and buses.

If implemented, RoSPA believes that the new speed restrictions for lighter HGVs should be the same as the lower limits that already apply to larger HGVs.

Larger goods vehicles and passenger vehicles are prohibited from using the outside lane of motorways with three or more lanes. If the same speed restrictions that apply to these vehicles are applied to lighter goods vehicles and to minibuses and midi-buses, it would seem logical to also extend the prohibition on using the outside lane.

**QUESTION 4.**

***Ought the fitting of top-speed limiters to apply only to new vehicles registered after the new requirements come into force? If not, to what categories of vehicle and to how far back in date should retrospective fitting be required?***

The legislation must be retrospective, otherwise, operators will be encouraged to retain older vehicles on the road as long as possible. These older vehicles may be less roadworthy than newer vehicles, and their design is also likely to be less safe for any vulnerable road users involved in an accident with them. It may also be more cost effective for companies to retain older vehicles because their speed is not limited and they will be able to do longer journeys in the time allowed by the driver's hour's legislation. Therefore, the legislation must be retrospective to avoid this.

Therefore, RoSPA supports the EC proposal to initially require speed limiters to be fitted only to new vehicles registered from 1 January 2004. But, by 1 January 2005, to extend the requirement to all vehicles in the new categories registered from 1 January 2001. And to allow an extra year, until 1 January 2006, for those in-scope vehicles used exclusively in national transport, to be fitted with limiters.

**QUESTION 5.**

***What kinds of phasing-in over time would be desirable for any new measures adopted?***

RoSPA supports the phasing requirement proposed in the EC Directive that by 1 January 2005, the requirement would extend to all vehicles in the new categories registered from 1 January 2001. There would be an extra year of grace, until 1 January 2006, for those in-scope vehicles used exclusively in national transport.

The Society thanks the DTLR for the opportunity to comment on these proposals. There are no objections to the contents of RoSPA's response being reproduced in summary format.

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