

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

**RESPONSE TO THE EC CONSULTATION**

**“CONSULTATION OF INTERESTED STAKEHOLDERS ON THE CARS 21  
FINAL REPORT”**

**April 2006**

## **Consultation of Interested Stakeholders on the CARS 21 Final Report**

This is the response of the Royal Society for the Prevention of Accidents (RoSPA) to the European Commission's consultation entitled "Consultation of Interested Stakeholders on the CARS 21 Final Report".

RoSPA welcomes the opportunity to comment on the consultation paper. As RoSPA is an accident prevention organisation, our response is restricted to road safety issues.

### **Has CARS has addressed and proposed the most relevant issues for the automotive industry?**

*RoSPA Response:*

Road safety is a highly relevant issue for the automotive industry, and will become more so in future. Road traffic injury will be the third leading contributor to the global burden of disease in 2020<sup>i</sup>

Effectively improving safety has a huge role to play in developing a globally competitive car industry. The European Commission is in a perfect position to set policy priorities to encourage European Car Manufacturers to address effective, evidence-based priorities in order to put Europe at the forefront of both vehicle safety policy and technology.

The CARS 21 Report identifies several technologies that could be feasibly introduced over the next few years and help to reduce road casualties. RoSPA supports the introduction of these technologies.

We are particularly pleased with the impetus for manufacturers to fit ISOFix systems into class M1 vehicles, a step which will in time reduce the number of mis-fitted child seats across the EU.

Of the technologies identified, stability control will also lead to a significant reduction in the number of accidents on the roads. Its benefit is proven and it is important that implementation strategies are considered by all parties to help a rapid propagation of the technology throughout the vehicle fleet - either by legislative measures, or by publicity to encourage car buyers to purchase it when buying vehicles.

However, there are several types of technology that are conspicuous by their absence in the report, which are highly cost effective and, above all, save lives.

In order to build the '*holistic, integrated approach involving vehicle technology, infrastructure, and the road user*' identified in Recommendation n<sup>o</sup> 12 the priorities of vehicle safety should be aligned with the rest of the road safety community, which are based on statistical evidence. This would reinforce the shared responsibilities to road safety that CARS 21 rightly points out are required.

Research shows three issues (listed below) that are large contributory factors to the number of road deaths in Europe. These are identified in the CARS 21 report but preventative technologies are not in each case. The potential benefits of the following technology are great, and early targets should be included in the road map to give them priority.

- *"Excessive and improper **speed** is a factor in about one-third of fatal and serious accidents"*

Technology called Intelligent Speed Adaptation (ISA) is being researched and developed which will help drivers not to speed and has a great future potential for reducing the number of fatalities and serious injuries on the road.

Research has not only shown that it has a massive potential to reduce the number of casualties on the roads, but that it is also a cost effective way of doing so. A review of benefit-cost ratios for ISA in the UK was conducted<sup>ii</sup> for several different types of system, and both low and high GDP growths were considered. Every benefit-cost ratio exceeded 3.5, with the highest at 16.7 for a dynamic and mandatory ISA system.

Actions need to be taken now, and goals set in the road map, to encourage early take up and effective implementation strategies of ISA.

- ***Drinking and driving** is responsible for about 10,000 deaths every year*

Technology with the potential to reduce drink driving is starting to become available, and some manufacturers now offer an "Alcokey" (a simplified alcohol interlock), which is part of the ignition and immobiliser system in a car.

The technology needs to be included in the road map.

- *Failure to wear a **seat belt** or **crash helmet** is a serious aggravating factor in accidents and approximately 7,000 deaths could be saved though improved use (to the best international rate)*

There is more that can be done by using in-vehicle technology to encourage seatbelt wearing, and seat belt reminder systems have been identified as way of doing this, and to reduce number of fatalities on the roads. Research has shown that some seat belt reminder systems are more effective than others, it is important that there is a consensus of best practice achieved to get the best results from this technology.

- *It is recommended that the Commission adapts phase 2 of the [pedestrian protection] directive as soon as possible.*

In terms of global road safety issues, countries with a less developed road infrastructure have a larger proportion of pedestrian and cyclist casualties<sup>iii</sup>. Vehicle based solutions to this problem are required.

Setting high standards for pedestrian protection in Europe, and simultaneously encouraging best practice through programs such as EuroNCAP, will strengthen the European industries position in emerging markets.

Pedestrian Protection is also a cost effective measure to implement, and research conducted on behalf of the European Commission<sup>iv</sup>, which recommended standards for vehicle fronts, found that the benefit/cost was 6.4 for passive measures when augmented with mandatory Brake Assist.

### **Whether the actions proposed by CARS 21 are cost-efficient and balanced?**

*RoSPA Response:*

Fundamentally, in order to increase the cost-efficiency of money spent on vehicle safety technology, vehicle safety priorities set in policy need to be based on maximum serious casualty reduction, as identified above.

### **Conclusion**

An automotive industry, which is looking for cost-effective and relevant road safety issues will address the factors that lead to serious and fatal injuries.

Research has identified three priority areas in which action needs to be taken, and these are speeding, drink driving, and failure to wear a seat belt. Much road safety education, training, publicity, road engineering, and enforcement efforts are based on these factors, and in order to build an integrated approach, vehicle engineering efforts also need to be.

Although preventative and driver assist technologies are not as mature as most of the solutions identified in the report, the objectives of the CARS 21 group were to make recommendations, not just in the short term, but the long term. These three issues need to be highlighted as key issues in future, and the implementation of suitable technologies needs to be considered now.

Design changes which reduce the severity of injury to pedestrians struck by vehicles may be an effective way of improving the European Industry's position in emerging economies, where vulnerable road users account for a significant proportion of fatalities.

Finally, it is important that the response of drivers to new technology is evaluated, to reduce the chances of behavioural adaptation, which would lessen any potential casualty savings.

RoSPA thanks the EC for the opportunity to comment on this consultation. We have no objection to the contents of RoSPA's response being reproduced or attributed.

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<sup>i</sup> **The World Report on Road traffic injury prevention.** Peden M, Scurfield R, Sleet D, Mohan D, Hyder AA, Jarawan E, Mathers C (eds.). Geneva, World Health Organization, 2004.

<sup>ii</sup> **Intelligent Speed Adaptation**, Dr Oliver Carsten, Presented at RoSPA's 67<sup>th</sup> Road Safety Congress, 2002.  
<http://www.rospa.com/roadsafety/conferences/congress2002/proceedings/carsten.pdf>

<sup>iii</sup> **World Report on Traffic Injury Prevention**, Dr Margie Peden, Presented at RoSPA's 70<sup>th</sup> Road Safety Congress, 2005.  
<http://www.rospa.com/roadsafety/conferences/congress2005/info/peden.pdf>

<sup>iv</sup> **A Study on the Feasibility of Measures Relating to the Protection of Pedestrians and Other Vulnerable Road Users – Addendum to Final Report**, B Hardy and G Lawrence, TRL, 2005  
[http://europa.eu.int/comm/enterprise/automotive/pagesbackground/pedestrianprotection/pedestrian\\_protection\\_study\\_addendum.pdf](http://europa.eu.int/comm/enterprise/automotive/pagesbackground/pedestrianprotection/pedestrian_protection_study_addendum.pdf)