



accidents don't have to happen

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Patron: Her Majesty The Queen

29th January 2019

Dear Mr Sanderson

DfT Trailer Safety Research Project

Thank you for the opportunity to respond to the Department for Transport's Trailer Safety Research project. RoSPA has consulted with its National Road Safety Committee on this matter and is pleased to provide the following comments.

Our understanding is that the purpose of the project is to identify the extent of road incidents involving trailers and caravans that resulted in injury or death and to provide an overview of potential benefits and challenges of mandatory testing or registration of trailers over 750kg.

Data provided by AECOM found that 983 of the 129,982 personal injury collisions which occurred on Britain's roads in 2017 involved a trailer or caravan. Fleet compliance checks by the DVSA found that 11.7% of GB trailers in a sample of 1,360 were issued a prohibition for a serious offence, but it is unclear as to the breakdown between mechanical and loading offences.

RoSPA is supportive of any measures which have clear safety outcomes which are evidence based. However, we have strong reservations of the current consultation proposals for the reasons stated below:

- It is not logical to have an annual test for a caravan after one year of sale, which would bring it in line with the current testing regime as applicable for trailers which can carry 3,500kg or more. If this were adopted caravans would have a more stringent testing regime than the vehicle pulling it. For RoSPA to support this we would need clear evidence that mechanical failure was an issue for caravans between 1 and 3 years old.
- Before a mandatory caravan test is adopted RoSPA would like to see a breakdown of crash causation factors involving; poorly maintained caravan/trailer, driver error including incorrect loading. Before supporting a proposal to have an age related mandatory test further evidence is required as to whether this is actually contributing to caravan/trailer crashes.
- The proposals to only include trailers over 750kg would exclude smaller privately owned trailers which are often maintained to a much lower standard than a commercial trailer.
- Registration with the DVLA is not currently mandatory for trailers and caravans, the law only requires certain trailers that are travelling internationally to be registered. RoSPA is unclear how domestic registration would work and whether this would place a further unnecessary



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administrative requirement on both private individuals and commercial sector for little safety gain.

In conclusion, RoSPA questions whether applying HGV testing to domestic vehicles is appropriate as it is likely to involve considerable bureaucracy for little road safety benefit.

Nick Lloyd

A handwritten signature in blue ink, appearing to read 'Nick Lloyd', with a horizontal line underneath.

Acting Head of Road Safety