

Jesse Norman MP
Parliamentary Under Secretary of State for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

Monday 14 August, 2017

Re: Improved safety standards for new vehicles

Dear Mr Norman

We are writing to urge you to support improvements to European legislation, and, post-Brexit, champion continued improvements under UK legislation, regarding minimum safety standards for vehicles to save lives and prevent serious injuries on UK roads.

As you will be aware, more than 1,700 people were killed in road collisions in Britain in 2015 - a figure that has reduced only slightly in recent years[1]. Further reductions can be achieved through tightening of vehicle safety standards.

EU vehicle safety standards, which apply in the UK, were last updated in 2009 and significant advances in vehicle technology, which have taken place since then, make it prudent to raise the bar and implement further cost effective life-saving safety measures as standard.

However, safer requirements have been subject to many delays in Europe and legislation is now expected in 2018. The UK government should ensure its voice is urgently heard in Europe, supporting the introduction of all 19 safety measures listed in the EC's December 2016 report[2], and ensuring these measures are retained and developed further following Brexit. These proposals (the key ones of which are detailed in the attached briefing paper) are fully in line with the UK Government's Road Safety Statement.

Supporting these changes, and the others under consideration in Europe, helps Britain assert its position as a global leader in supporting safety technology advances and also supporting the drive towards Connected and Automated Vehicles (CAVs), strengthening our competitive position.

These improved minimum vehicle safety standards, along with better investigation of the causes of crashes and injuries, are crucial to ensure the effective delivery of the 'safe system' approach adopted by Britain, driving towards the ultimate target of zero deaths on our roads.

We would welcome the opportunity to work with you and your department to understand the Government's position on the measures highlighted in the attached briefing and all those currently being proposed by the EC. Improving vehicle safety standards has the potential to save lives and prevent injuries, and there is considerable evidence that the measures suggested are cost effective[3].

Please could you let us know how the UK will support our call for higher vehicle safety standards and we would welcome the opportunity to meet with you and your officials to discuss the issues raised in more detail.

Yours sincerely,

Mary Williams, CEO, Brake
John Pryor, Chairman, Association of Car Fleet Operators
Sue Percy, Chief Executive, Chartered Institution of Highways and Transportation
Antonio Avenoso, Executive Director, European Transport Safety Council
Rachel Maycock, Head of Public Affairs, Living Streets
David Davis, Executive Director, Parliamentary Advisory Council for Transport Safety
Amy Aeron-Thomas, Advocacy and Justice Manager, RoadPeace

References:

- [1] Department for Transport, Reported road casualties Great Britain, annual report: 2015
- [2] EC, 2016, Saving lives: boosting car safety in the EU
- [3] Hynd et al. (2015). Benefit and Feasibility of a Range of New Technologies and Unregulated Measures in the fields of Vehicle Occupant Safety and Protection of Vulnerable Road Users.

Modern Vehicles: Campaign Position Paper 2017/18

Author: Mary Williams, CEO, Brake

Introduction

There is an opportunity right now to toughen laws stipulating minimum standards on new vehicles in the UK and across Europe, and lead the world globally. The EC vehicle safety regulations are currently under review. The **General Safety Regulation (GSR)** (EC 661/2009) and the **Pedestrian Protection Regulation (PPR)** (EC 78/2009) are expected to be amended in 2018.

There are two types of vehicle safety technologies: active safety technologies (that aim to prevent crashes); and passive safety technologies (that aim to mitigate the effect of crashes). This position paper calls for:

1. More active safety technologies to be required to be fitted to new vehicles;
2. New vehicles to be required to pass more rigorous crash tests;
3. Short time frames for implementation of the updated legislation, enabling rapid fleet modernisation;
4. Legislative change adopted in GSR and PPR to be retained following Brexit;
5. For the British government to remain committed, beyond Brexit, to further vehicle safety legislation as technological solutions arise.

The measures the EC is considering are listed broadly in a report it published at the end of 2016 [1] preceded by a review in 2015 of feasibility of implementation of a wider number of possible measures [2]. This position paper doesn't cover all possible improvements to GSR and PPR possible from that report and review. It lists specific recommendations under consideration that are urgent to progress. Others would also be welcomed.

1 Crash prevention ('active safety', or 'crash avoidance' systems)

Thanks to camera and sensor technology using radar and lasers, vehicle manufacturers have developed active safety, or crash avoidance systems (sometimes referred to as Advanced Driver Assistance Systems (ADAS)) that can prevent crashes. **We want:**

1a Voluntary ISA on all vehicles

Voluntary Intelligent Speed Adaptation (ISA) aims to detect roads' speed limits and automatically keep the vehicle within limits unless the driver purposely over-rides the system. The vehicle is connected to a virtual GPS "map" of speed limits (already used by sat-nav providers) and/or cameras that can spot speed limit signs.

Why now?

1. Speed is the number one killer. The slower we drive, the more chance of stopping in time.
2. Academics have said that nearly one in three fatal crashes could be prevented by ISA [3].
3. For years, speed limiters have been fitted to commercial vehicles by law. ISA is a natural next step.
4. The fleet industry is already doing it. Transport for London is requiring ISA in its new buses [4].
5. ISA enables drivers to comply with the law and avoid fines and prosecution.

1b AEB on cars

Autonomous Emergency Braking (AEB) aims to sense the chance of a collision ahead and automatically applies brakes to mitigate or avoid it. AEB systems differ. The less advanced systems spot other vehicles. The more advanced systems, already being fitted to some cars, aim to detect pedestrians and cyclists too. Some of these advanced systems are being found to perform well in crash testing by Euro NCAP. We want a rapid timeline for legislating advanced AEB systems to save lives of people on foot and bicycles.

Why now?

1. The technology is advancing rapidly and particularly has the potential to save lives of the most vulnerable road users.
2. The existing GSR already requires new medium and heavy commercial vehicles to be fitted with an AEB system that aims to stop them running into vehicles (e.g. due to the driver being asleep).

1c Direct vision standards for large vehicles

Direct vision means, literally, what the driver can directly see from the driving seat (not through use of mirrors or cameras). It is particularly important that there are standards set for direct vision afforded to drivers of large vehicles (trucks and buses). Typically, poor direct vision leads to casualties – commonly cyclists - on the far side of large vehicles but also pedestrians and cyclists in front of large vehicles.

1d Driver Distraction and Drowsiness Recognition (DDDR)

Fatigue-related crashes are notoriously challenging to prevent and also identify. Systems exist that monitor a driver's steering to detect erratic driving and send a warning (usually audible). Other systems monitor a driver's eyes through a camera, to detect drooping eyelids. Combined with Event Data Recorders (see below), such systems could help prevent fatigue-related crashes; drivers will know their behaviours are being monitored and recorded, and if they ignore warnings and cause crashes they can be held culpable. The most effective DDDR systems should be legislated.

2 Crash protection (Passive safety measures)

Europe sets crash test standards (rather than stipulating fitting of particular measures such as air bags). **We want:**

2a Occupant protection test standards in line with Euro NCAP “good” ratings

We want mandatory testing of car occupant safety that brings tests up to the same standard as those required to win ‘good’ (4 or 5 star) ratings in each aspect of the Euro NCAP voluntary tests. We support:

i) Improvements to **frontal impact testing**

- Remove the exemptions within the existing EU-stipulated 40% overlap test (UN Reg94) for heavier cars (>2,500kg) and vans and introduce a ‘small overlap’ test
- Introduce a full width test (UN Reg136) including with rear dummies

ii) Improvements to **side impact test**

- Remove the exemptions (that currently exclude taller cars and vans) within the EU-stipulated UN Reg95 (a car to car side impact crash test)
- Introduce a pole impact test (UN Reg127) (to simulate crashing into a pole or tree and encourage the fitment of curtain airbags)
- Introduce a far-side impact test

iii) Introduce **rear impact testing**

A rear impact test would verify safety standards of the fuel system (petrol, diesel, electric and hybrid) and structural integrity.

iv) Require **seat belt reminders** to be fitted to all passenger seats in cars. These are already frequently fitted in new cars.

Brake supports lower test requirements for small, lightweight, ultra-low emission vehicles with low travelling speeds (commonly referred to as pods), which are most appropriate for use in urban environments and are expected to become more common as we move towards an emission-free, automated future.

2b Demanding crash test standards to protect people outside cars

i) **Real world crash investigation**

There needs to be funding and delivery of a UK and pan-European collision investigation programme that prioritises, among other things, investigating collisions between all types of vehicles and vulnerable road users (people on foot, bicycles and motorcycles).

ii) **Mandate tests that are currently for monitoring purposes only**

The EC should retain its existing mandated tests (lower leg form to bumper, and head forms to bonnet) and mandate in the PPR:

- its adult head form to windscreen monitoring test, with an impact speed of at least 40km/h
- an upper leg form against bonnet leading edge test, in line with EuroNCAP testing procedure

- adult head form to A pillar tests at 40km/h
- a test between vehicles with higher BLEs (typically SUVs) and a child's head form and small adult thorax

iii) Publicise test results

Ask type-approval authorities to collate and communicate every 3 years regarding all test results

iv) Legislate Event Data Recorders (EDRs)

EDRs are essential to provide information for post-crash investigation.

References

[1] EC, Saving lives: Boosting car safety in the EU, 2016

[2] EC, Hynd, D. et al, Benefits and feasibility of a range of technologies and unregulated measures in the field of vehicle occupant safety and protection of vulnerable road users: final report

[3] Lai, Carsten & Tate (2012) 'How much benefit does Intelligent Speed Adaptation deliver: an analysis of its potential contribution to safety and environment'. Accident Analysis and Prevention, 48: 63-72.

[4] Transport for London, Successful trials prove effectiveness of speed limiting technology on buses, 2016.