

Revision of the Vehicle General Safety Regulation and the Pedestrian Safety Regulation - Questionnaire for companies and organisations

Fields marked with * are mandatory.

Please use this version of the questionnaire if you are replying as a representative of a company or an organisation.

Section I - Identification of respondent

*1 Please indicate your preference for the publication of your response on the Commission's website:

Please note that regardless the option you chosen, your contribution may be subject to a request for access to documents under the Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In this case the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

- can be published with your entity's information (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication).
- can be published provided that your entity remains anonymous (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

*2 Please specify the type of company or organisation

- Company producing vehicles
- Company producing automotive equipment
- Company providing maintenance services (like garage)
- Other producing company
- Organisation representing companies producing vehicles
- Organisation representing companies producing automotive equipment
- Organisation representing companies producing vehicles as well as those producing automotive equipment
- Organisation dealing with car safety
- Other organisation

*3 Please provide your full name:

300 character(s) maximum

Mary Williams, chief executive

* 4 Please provide the name of the entity on whose behalf you are replying:

300 character(s) maximum

Brake, the road safety charity

* 5 Please enter your email address:

300 character(s) maximum

mwilliams@brake.org.uk

* 6 Please indicate your country of residence/establishment within EU:

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom

Not established in the EU

*8 Is your entity registered in the Transparency Register of the European Commission and the European Parliament?

If you are not answering this questionnaire as an individual, please register in the Transparency Register. If your entity responds without being registered, the Commission will consider its input as that of an individual and will publish it as such.

- Yes
- No
- Not applicable

*9 Please indicate your entity's registration number in the Transparency Register:

300 character(s) maximum

282327328526-51

For organisations/associations

13 Please describe the members of your organisation/association (e.g. enterprises, associations of businesses, professional individuals, consumers, environmental advocacy, safety advocacy etc.)

600 character(s) maximum

A range of professional individuals including organisations operating large vehicle fleets, consumers, safety advocates, road crash victims, etc. We are a road safety NGO and our policy positions are advised and directed by various academics in the field.

14 How many employees work (full- and part-time) in your entity?

- Less than 10 employees
- 10-49 employees
- 50-249 employees
- 250 or more employees

Section III - Need for new legislation

In general, the number of road fatalities in the EU has come down considerably during the last decades, although recently this progress seems to have stagnated. The Commission is therefore now considering whether the safety elements of the General Safety and Pedestrian Safety Regulations should be updated to lower the number of road fatalities and severe injuries.

Please consult [the background document](#) for detailed information on the packages of safety measures that the Commission is specifically considering.

1 Please rank your 10 preferred safety requirements from the list below which you consider are the most necessary to reduce road accidents.

between 10 and 10 answered rows

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	1	2	3	4	5	6	7	8	9	10
Accident avoidance safety measures - Autonomous emergency braking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accident avoidance safety measures - Intelligent speed assistance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accident avoidance safety measures - Lane-keeping assistance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Accident avoidance safety measures - Driver drowsiness or distraction monitoring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General safety measures - Emergency braking display	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General safety measures - Safety belt reminders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General safety measures - Frontal crash testing updates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General safety measures - Side crash testing updates	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General safety measures - Rear crash testing introduction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
General safety measures - Alcohol interlock device interface standardisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
General safety measures - Crash event data recorder	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
General safety measures - Tyre pressure monitoring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures for trucks, trailers and buses - Front-end design and direct vision	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures for trucks, trailers and buses - Truck and trailer rear underrun protection (rear bumper)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures for trucks, trailers and buses - Truck lateral protection (side guards)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Measures for trucks, trailers and buses - Fire safety for buses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pedestrian and cyclist safety - Pedestrian and cyclist forward detection	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pedestrian and cyclist safety - Head impact on a-pillars and front windscreen	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>						
Pedestrian and cyclist safety - Reversing detection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2 Please explain on what basis you made the above ranking?

600 character(s) maximum

We need a range of active and passive safety measures that protect people effectively, particularly those who are most vulnerable and outside vehicles, most frequently on foot and bicycles – these road user groups represent an increasing proportion of EU road casualties. Most active safety measures use the same technologies, such as cameras and sensors and the efficiency of bundling these measures should be considered.

Section IV - Scope of the new legislation

General questions

*1 If new measures were to be introduced, you would prefer that they should focus on:

- All types of accidents
- Most severe accidents (causing the most fatalities)
- Most frequent accidents
- No opinion

*2 Which accident types do you think occur most frequently:

between 1 and 3 choices

- Frontal collisions head to head between motor-vehicles
- Frontal collisions of motor-vehicle into obstacle
- Side collisions of motor-vehicle into side of another motor-vehicle
- Side collisions of side of motor-vehicle into obstacle
- Rear collisions of motor-vehicle into tail-end of another or multiple vehicles in a row
- Roll-over accidents
- Spontaneous vehicle fires
- Collision of motor-vehicle with pedestrians
- Collision of motor-vehicle with cyclists
- Other

4 Please select and rank what you consider are the 7 key factors of causing such accidents:

between 7 and 7 answered rows

	1	2	3	4	5	6	7
Bad weather conditions (e.g. rain, fog, snow)	<input type="radio"/>						
Night time driving	<input type="radio"/>						
Higher than appropriate speed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient distance between vehicles	<input type="radio"/>	<input checked="" type="radio"/>					
Incorrect use of lights	<input type="radio"/>						
Driver operating mistake (e.g. slipping of clutch, incorrect judgement)	<input type="radio"/>						
Driver fatigue	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Driver distraction by use of mobile device (e.g. phone, tablet)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Driver distraction by use of vehicle entertainment equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Driver distraction by use of common vehicle controls	<input type="radio"/>						
Drunk driving	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Blind spots or no visibility (e.g. when reversing, front or side pillar obstruction)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>				
Vehicle malfunctioning (e.g. tyre failure, engine stalling)	<input type="radio"/>						
Other	<input type="radio"/>						

6 Please select and rank 5 accident types that should be addressed by further action on EU level:

between 5 and 5 answered rows

	1	2	3	4	5
Frontal collisions head to head between motor-vehicles	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Frontal collisions of motor-vehicle into obstacle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Side collisions of motor-vehicle into side of another motor-vehicle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Side collisions of side of motor-vehicle into obstacle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rear collisions of motor-vehicle into tail-end of another or multiple vehicles in a row	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Roll-over accidents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Spontaneous vehicle fires	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Collision of motor-vehicle with pedestrians	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Collision of motor-vehicle with cyclists	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8 Please select and rank 4 methods how road traffic accidents by further action on EU level should be addressed:

between 4 and 4 answered rows

	1	2	3	4
Further improving driver training	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Further improving general training and awareness of road users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further improving school education on road safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further improving road infrastructure layout, markings, signs and signalling	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further improving periodical vehicle inspections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stricter enforcement of traffic laws	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Introducing new vehicle safety features	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10 Generally speaking, there appears to be a lack of clear in depth accident data throughout the EU. This may mean that it is difficult to understand what precisely caused accidents to happen and what can be done to prevent them. Do you agree or disagree with this statement?

- Totally disagree
- Slightly disagree
- Agree
- Totally agree
- No opinion

11 With new vehicle safety technologies, it may be necessary to understand how effective they are in every day traffic situations and therefore, more in depth accident data would be essential. Do you agree or disagree with this statement?

- Totally disagree
- Slightly disagree
- Agree
- Totally agree
- No opinion

12 What do you think would be the best way to obtain better accident data?

900 character(s) maximum

A Road Collision Investigation Branch for Europe which would work with the Member States police forces and collate existing investigation evidence into a central repository that would be used to prevent future collisions and injuries.

13 If new vehicle safety measures were to be introduced, you would prefer that they are implemented:

- On a mandatory basis (as standard equipment included in the base price of all vehicles)
- On the basis of the automotive industry's self-commitment or voluntary agreement (as standard equipment included in the base price of most vehicles)
- No opinion

14 For those options below that you (as manufacturer), your clients (as supplier), your members or your members' clients are currently offering, please indicate the range of prices (without tax) that is charged for the particular feature to final end-consumer of the relevant vehicles and provide a range of the actual production cost?

(For all motor-vehicles consisting of passenger cars, light commercial vehicles, trucks and buses, unless otherwise noted)

	From (in euro)	To (in euro)
Accident avoidance safety measures - Autonomous emergency braking (passenger cars only)		
Accident avoidance safety measures - Intelligent speed assistance		
Accident avoidance safety measures - Lane-keeping assistance (passenger cars only)		
Accident avoidance safety measures - Driver drowsiness or distraction monitoring		
General safety measures - Emergency braking display		
General safety measures - Safety belt reminders		
General safety measures - Frontal crash testing updates (passenger cars and light commercial vehicles only)		
General safety measures - Side crash testing updates (passenger cars and light commercial vehicles only)		
General safety measures - Rear crash testing introduction (passenger cars and light commercial vehicles only)		
General safety measures - Alcohol interlock device interface standardisation		
General safety measures - Crash event data recorder (passenger cars and light commercial vehicles only)		
General safety measures - Tyre pressure monitoring (motor-vehicles, except passenger cars, and heavy trailers)		
Measures for trucks, trailers and buses – Improved front-end design and direct vision (for trucks and buses only)		
Measures for trucks, trailers and buses – Improved rear underrun protection (rear bumper) (for trucks and heavy trailers only)		
Measures for trucks, trailers and buses – Improved lateral protection (side guards) (for		

trucks only)		
Measures for trucks, trailers and buses – Improved fire safety (for buses only)		
Pedestrian and cyclist safety - Pedestrian and cyclist forward detection (passenger cars and light commercial vehicles only)		
Pedestrian and cyclist safety - Head impact on a-pillars and front windscreen (passenger cars and light commercial vehicles only)		
Pedestrian and cyclist safety - Reversing detection (all motor-vehicles and heavy trailers)		

Section V - Policy implementation and outcomes

1 Please indicate to what extent do you think that the following could be the outcome of further action at EU level to make new vehicle safety features mandatory?

	Totally disagree	Slightly disagree	Agree	Totally agree	No opinion
* Vehicle safety features will become cheaper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* It can speed-up the introduction of self-driving vehicles in Europe	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* It can anticipate and provide solutions for future issues that can be raised by self-driving vehicles, such as liability questions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Number of road traffic deaths will go down significantly	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Number of severe injuries in road accidents will go down significantly	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* It will not have any added value as market development is going in that direction	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Maintenance of cars will become cheaper	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Repairs due to accidents will become cheaper	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* There will be less repairs due to accidents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Spare parts manufactures will produce cheap alternatives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Air pollution will decrease	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Car insurance will go down	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Number of traffic accidents will fall	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* EU manufactures will be able to compete better on the international market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Vehicles will become more expensive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Life-span of cars will be extended	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Consumers will prioritise used over new cars	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Consumers will drive more	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There will be more congestion	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*Other



2 Other (Please explain)

300 character(s) maximum

3 Please provide a short justification for your answers:

600 character(s) maximum

New vehicle technologies will reduce road collisions and injuries. Measures to prevent collisions reduce harmful environmental effects through lowering speeds (ISA - less tailpipe emissions) and by avoiding contaminants being spilt during the impacts. There is good evidence that as vehicle emissions legislation has been applied, vehicle prices have decreased in real terms, and during this period car manufacturers have fitted more safety technologies to meet the Euro NCAP requirements - again with no increase for the consumer.

4 Which safety measures should be implemented together due to shared cost in implementing them?

900 character(s) maximum

The active safety measures, namely: Lane keep assist; AEB for car to vehicle; AEB for car to pedestrian and cyclist (forward detection warning); driver distraction and drowsiness detection; ISA.

Section VI - Timing (different dates of application for certain requirements)

Questions for organisations

2 Which vehicles do you think should be given priority in relation to the possible introduction of new safety measures and requirements? (more than one answer possible)?

- Passenger cars, SUVs
- Light commercial vehicles, vans, pick-ups
- Heavy goods vehicles, trucks
- Buses
- Trailers
- Others

3 Others (please specify)

300 character(s) maximum

We would like to see more done for motorcycle safety.

4 Can you please explain your choice(s)?

600 character(s) maximum

To reduce casualties on our roads all vehicle safety must be improved within the same time frame to maximise the benefits. For example, if ISA is just applied to one type of vehicle, we could still see those vehicles involved in speed related collisions when another vehicle type is driven above the posted speed limit.

Section VII - Other issues

1 Please share any quantitative data reports or studies to support your views

Brake has read the two EC reports written with TRL and noted the independent and in-depth conclusions therein, which has informed our position. Please also see the relevant position papers of our Modern Vehicles campaign accessible here:
<http://www.brake.org.uk/top-level/18-campaigns/1699-modern-wheels-facts-and-campaign-updates-draft>

2 Please feel free to upload a concise document, such as a position paper. Maximum file size 1 MB.

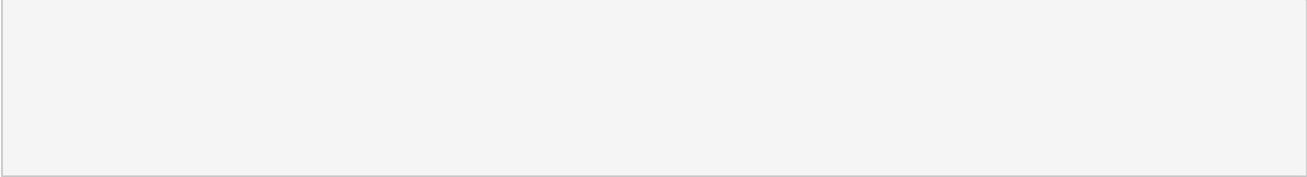
Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

3 Would you agree to be contacted by the Commission for a possible follow-up?

- Yes
 No

4 Please provide the details how you can best be contacted.

mwilliams@brake.org.uk



Contact

grow-vehicle-safety@ec.europa.eu
