



ANEC-TRAF-2018-G-032rev1
July 2018

ANEC reply to EC proposal COM(2018) 286 final (Revision of General Safety Regulation)

ANEC strongly supports the European Commission's [proposal COM \(2018\) 286 final](#).

Technical progress in the area of advanced vehicle safety systems offers new possibilities for reducing casualty numbers and in order to minimise the number of fatalities, some of the relevant new technologies need to be mandatory on all new vehicles, not only as currently on premium or luxury vehicle models. However, it is also paramount that the vehicles remain road-worthy (noting the significant 2nd and 3rd hand market for vehicles).

In particular:

-We support active safety measures to avoid accidents, but those should complement passive safety and not substitute or deteriorate passive safety measures, both need to be improved in parallel.

-We very much support Intelligent Speed Assistance (ISA), which is one of the most effective new vehicle safety technology currently available to reduce deaths and serious injuries by preventing crashes. Speeding remains still a very important factor for accidents and an Assisting overridable ISA on all vehicles would help reducing fatal crashes by 19-28% and serious crashes by 14-17%.

-We support the installation of Event Data Recorders on all motor-vehicles, trucks and buses to be included.

-We support also advanced emergency breaking, lane-keeping systems, driver drowsiness and attention monitoring and distraction detection and reversing detection systems (with camera and monitor) which have a high potential to reduce casualty numbers considerably. However, it is important that the systems are effective and do not fail, e.g. if the camera fails due to frigid temperature or dirt, an alert on the dashboard screen should warn the driver of the failure.

-Today's trucks are very ill-designed for urban use. They have poor direct vision and therefore huge and deadly blind spots environments (they are responsible for 15 % of road fatalities). A European direct vision standard that would make safer designs compulsory, at least for trucks most commonly used in urban areas, and



ANEC is supported financially by the European Union & EFTA

EU Transparency Register No. 507800799-30

Raising standards for consumers

ambitious direct vision requirements for other types should be introduced from the early 2020s as technology is already available.

-Bearing in mind that the new vehicles will be traded widely in the internal market, where they could be used for up to 20 years it needs to be assured that the functionality of the systems does not deteriorate. The functionality of advanced driver assistance and future automated driving systems need to be assured over the entire life cycle. A provision should be included in the package to make it mandatory for the manufacturers to make software updates available throughout the life cycle of the vehicle to securely download the required software and to ensure that the component that is operated by this software is fully functional.

-Additionally, with the increasing digital automation, risks of remote manipulation (cyber-attacks, or compatibility conflicts etc) have to be avoided. In view of these new complexities and requirements for road safety, type approval procedures for the independent evaluation of these vehicle systems must be adapted and take effect in the development process of the vehicle model the entire end-to-end life-cycle processes for the vehicle and its electronics systems. Additionally, effective measures should also be taken to prevent tampering and market surveillance should be enhanced to detect free riders.

Whereas we welcome the Commission's proposal we are disappointed that it does not address the issue of child deaths in cars due to hyperthermia (majority of those children were forgotten in cars according to US data). In Europe, no national or European data sources track heat related incidents to children in motor vehicles, but it does not mean it does not happen in Europe. New systems provide drivers with a warning on their monitor not to forget the mobile phone or wallet. We would like to see this alert extended for the most vulnerable car occupant.