

## **Preliminary response from ANEC to the European Commission public consultation on the final report of the Cars21 High Level Group**

ANEC welcomes this opportunity to present the European Commission with its views on the recently released final report of the CARS 21 High Level Group. ANEC, along with other NGOs, has in the past been disappointed with the Commission for a lack of transparency and restricted consultation in the area of transport and traffic safety. This public consultation exercise is therefore greatly welcomed.

However, ANEC regrets the rather short period of this consultation process (16 working days), and the fact that it is being undertaken during the Easter holiday period, which reduces the opportunity for thorough contributions from stakeholders who were not involved in the High Level Group. We ask the Commission to ensure that the timing of future consultations is considered more carefully to ensure widespread and valuable input.

ANEC's comments focus on the recommendations of the final report that deal with road safety and the environment. ANEC is pleased that the CARS 21 final report so effectively highlights the true road safety priorities of speed, drink driving and seatbelt use. More specifically:

1. Recommendation 12 of the final report aptly proposes vehicle technology measures to enhance road safety. ANEC would like to add **intelligent speed adaptation (ISA)** to this list, which is a robust, well developed existing technology that responds to the top road safety priority of reducing speed. Additionally **alcohol interlocks** are already being used both in commercial transport (for quality assurance) and in recidivist drink driver programmes. Their inclusion in the road map would, at the very least, ensure European facilitation via flexible instruments of these important technologies addressing road safety priorities.
2. ANEC also welcomes the road safety recommendations on infrastructure.<sup>1</sup> However, more needs to be done in this area. The definition of best practice guidelines, standards, and priority measures for infrastructure protecting **vulnerable road users** should be elaborated and implementation facilitated. In addition, standards for infrastructure to vehicle communication, and "Real Time traffic and travel information" should be elaborated. This will facilitate the application of Advanced Driver Assistance Systems and variable speed limit technologies that can function across the EU.
3. ANEC welcomes the conclusions of the final report regarding the intention of the Commission to revise the Pedestrian Protection Directive<sup>2</sup>. Based on the contents of the draft proposal of the Commission ANEC highlights three issues

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<sup>1</sup> Part of Recommendation 12, page 33 of the report

<sup>2</sup> Directive 2003/102/EC

that would need to be included in the final instrument. Firstly, we would urge a **rapid implementation** of the measures to apply the second stage standards. Secondly, we would seek to ensure that the inclusion of **active safety devices** were **additional** to passive safety benefits derived from improved vehicle design, and not a substitution. Finally, we urge the Commission to ensure that the **bonnet leading edge to upper leg test** be retained as a standard rather than merely be retained for monitoring purposes. This would ensure that injury levels would decrease rather than injury patterns change as the most aggressive contact point migrates from the bumper leading edge upwards to the bonnet leading edge.

4. An important issue missing from this report is that of **occupant protection** at the time of a crash. Simple technologies, such as air bags, can help save lives and these should be further promoted.
5. ANEC welcomes the move towards international harmonisation of motor vehicle regulations. However, we are very concerned about the final report's recommendations concerning simplification of the regulatory environment. **Self-testing or virtual testing** as cost-cutting and efficiency principle should be treated with caution, to ensure that consumers are not disadvantaged, and to avoid manufacturer abuse of these approaches.
6. ANEC welcomes the final report's conclusions regarding a need to improve consumer information in the form of environmental labelling. Directive 1999/94/EC<sup>3</sup> on the fuel economy of passenger cars appears insufficient as it does not introduce a Europe-wide scheme of **graphical displays**, using grades. The Directive requires only the presentation of numerical values which makes it difficult for the consumer to compare energy consumption. Hence, ANEC recommends that cars be incorporated in the **EU energy labelling scheme**, taking into account already existing national approaches.
7. Despite the voluntary commitment by the European car producers to reduce the CO<sub>2</sub> emissions of new cars to 140 g/km by 2008, they are unfortunately far from reaching their objectives, based on various recent studies. This should be taken as an indication **not to proceed solely with voluntary agreements** in this and other environmental areas. Instead, ANEC calls for the implementation of clear-cut regulatory measures.

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<sup>3</sup> Directive 1999/94/EC of the European Parliament and of the Council of 13 December 1999 relating to the availability of consumer information on fuel economy and CO<sub>2</sub> emissions in respect of the marketing of new passenger cars.