

Response to the Public Consultation on the Cars21 Final Report.

The VOICE Network welcomes this opportunity to present the European Commission with its views on the regulatory regime in the Automotive Sector for the coming ten years. NGOs have 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, given the rather short period (23 days and only 16 working days) of this consultation process, alongside the fact that it is being undertaken during the Easter Holidays, it has proved difficult to ensure that all potential contributors have had the opportunity to thoroughly examine this position. We therefore ask the Commission to ensure that the timing of future consultations is considered more carefully to ensure widespread and valuable input.

The VOICE Network is pleased that the CARS 21 final report so effectively highlights the true road safety priorities of speed, drink driving and seatbelt use addressed within an integrated approach. The VOICE Network, however, would emphasise that an integrated approach does not mean downgrading ambition levels for action in any one area. Rather it means seeking synergies instead of antagonisms and ensuring policy actions are complementary. The integrated approach should not, therefore, be used as a reason to lessen regulatory efforts in any one area, for example in improving the passive safety of vehicles to vulnerable road users or revising the target for reducing average new car CO₂ emissions via technical innovation.

Unfortunately there is a low priority in the report afforded to the protection of vulnerable road users. There are, therefore a number of specific recommendations we would make to redress this.

Recommendation 12 of the final report aptly proposes vehicle technology measures to enhance road safety. VOICE 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.



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VOICE also welcomes the road safety recommendations on infrastructure. However, more needs to be done in this area including the definition of best practice guidelines, standards, and priority measures for infrastructure protecting vulnerable road users.

The VOICE Network welcomes the conclusions of the final report regarding the intention of the Commission to revise the Pedestrian Protection Directive. Based on the contents of the draft proposal of the Commission, the VOICE Network recommends three improvements 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.

Despite the voluntary commitment by the European car producers to reduce the energy consumption of new cars of 5.5L/100km by 2008, and of 3.5L/100km by 2012, the producers 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.

The Members of the VOICE Network are:

AGE – The European Older People’s Forum. ANEC – The European Consumer Voice in Standardisation. BEUC – The European Consumers’ Organisation. EEN - The EPHA Environment Network. ECSA - The European Child Safety Alliance. EDF - The European Disability Forum. T&E - The European Federation for Transport and Environment. EPHA - The European Public Health Alliance. ETSC - The European Transport Safety Council. Voetgangersbeweging (Pedestrian Movement) / Federation of European Pedestrian Associations.

