

## **The European Voice of Freight Logistics and Customs Representatives**

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Brussels, 1<sup>st</sup> of December 2009

### **RE: Internet consultation relating to the preparation of a European Road Safety Action Programme 2011-2020.**

CLECAT represents the interests of the vast majority of EU enterprises which offer logistics, freight forwarding and Customs services both within and outside Europe. CLECAT has therefore a first and foremost interest in the preparation of a European Road Safety Action Programme 2011-2020. We replied to the internet consultation recently launched by the Commission<sup>1</sup> and would like to complement our reply with the comments below.

First of all, CLECAT wants to highlight the fact that the number of road accidents due to heavy goods vehicles (HGV's) is small in percentage and has significantly decreased in the last few years. Despite this positive evolution, CLECAT realises that there is still plenty of room for optimising road safety for transport and passenger vehicles and that efforts should be put in the following fields:

➤ **Technological efforts:**

The EU road safety policy should continue to work on measures that limit the negative consequences of accidents through improved vehicle and safety system standards. This being said, installing and maintaining new devices such as Electronic Stability Control (ESC) systems, Advanced Emergency Braking Systems (AEBS) and Lane Departure Warning (LDW) systems for new heavy goods vehicles is costly and these costs should be taken into account in the calculations pertaining to the policy of internalisation of external costs. There is obviously a need for the EU to encourage road haulage companies to purchase road safety technological equipment, but this will result in actions from the industry only if proof of investment payback is provided (for instance by using incentives like insurance premiums or tax reliefs).

➤ **Effort on the drivers' behaviour:**

One of the reasons for the recent decrease of accidents involving HGV's is the extensive efforts made by road haulage companies to provide intensive training for professional drivers throughout their career, even though road haulage companies may wish to keep the awareness of professional drivers for instance on the following:

- the wearing of seatbelt
- the correct positioning of mirrors
- the assurance that the load is evenly distributed (to prevent an axle being overloaded)

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<sup>1</sup> <http://www.clecat.org/dmdocuments/pp015oetro091112roadsafety.pdf>

- the correct stowing of the cargo (to ensure that it did not shift whilst on the vehicle, which could unbalance the vehicle and trailer making it difficult to control under braking or cornering)

CLECAT regrets that other road users do not benefit from regular trainings and checks. When studying the causing principle of accidents involving HVG's, impairing manoeuvres made by other vehicles are often found to be at the origin of the accident involving HGV's. Limiting the number of these situations by providing private driver the opportunity to update their awareness would certainly be advantageous. CLECAT suggests implementing consistent measures on this issue as one should not forget that road infrastructure is to be shared by all users, including HGV's, the latter having often no other choice.

#### ➤ **Efforts of standardisation of the quality of vehicles' repair/control**

CLECAT supports the introduction of a requirement in all Member States to provide evidence of proper periodic controls and repair works that are adapted to the current state of technology. One should also not forget to include the electronic components of the vehicles in these inspections.

#### ➤ **Efforts on road infrastructure**

The road infrastructure's role in road safety is crucial and it is important for the Commission to establish mandatory requirement in all EU Member States to have modern road construction or upgrading existing infrastructure (just to name one out of many examples, the issue of rambling roadsides). Indeed, roads designed to minimize bottlenecks and ensure better traffic flow, as well as reducing roadside hazards, can have a significant impact on road safety. Moreover, we would like to remind the reader that the EU ambitious road safety objectives would be almost unreachable, if the necessary maintenance and upgrading of the infrastructure are not made a priority.

Some Member States have implemented systems designed to report inconsistencies of road signs, inadequacy or deterioration of infrastructure, etc. We believe that a coordinated EU wide approach to provide such service would contribute to savings on maintenance costs on the one side and consistent accident reductions on the other.

#### ➤ **Efforts on enforcement policy**

The EU should work on improving its law enforcement system surrounding road safety in a coordinated way all over the Union. For instance, speed limits in different Member States do not seem to obey the same standards or criteria, sometimes even in the same Member State speed limits outside urban areas seem to be imposed according to criteria that are certainly not perfectly transparent. This creates uncertainty and ends up in stimulating careless behaviour in drivers. In addition, CLECAT is in favour of a general reduction of speed limits to 80 km/h in urban motorways during peak times. Indeed, this type of rules would allow an optimised share of road infrastructure, ensure fluidity in traffic, and prove extremely beneficial in fuel savings. This would also allow for an additional benefit to HGV's, which are the worst affected by the stop-start manoeuvres typical of congestion.

Finally, CLECAT regrets that the proposal facilitating cross border infringement in the field of road safety<sup>2</sup> is still blocked at Council level and urges EU Members to find a political agreement

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<sup>2</sup> <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2008:0151:FIN:EN:PDF>

on a piece of legislation which is badly wanted in order to avoid creating obstacles to an effective EU road safety policy.

CLECAT remains at the entire disposal of institutional interlocutors, should there be a need to clarify or explain the points made above.