Recommendations for the Commission's mid-term review of the EU Road Safety Policy Framework 2021-2030

With a specific focus on active mobility and road safety for Vulnerable Road Users

Adopted by the EGUM Plenary on 04.07.2024

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1. INTRODUCTION

The European Parliament resolution of 6 October 2021 on the *EU Road Safety Policy Framework* reaffirms the EU's long-term strategic goal to achieve as close to zero deaths and zero serious injuries on the EU's roads by 2050, known widely as 'Vision Zero.' It also affirms the EU's medium-term goal to halve road deaths and serious injuries by 2030, in line with the Valletta Declaration. The Parliament resolved that these EU goals and targets on road safety should be underpinned by a coordinated, well-planned, systematic and well-financed road safety approach at EU, national, regional and local level.

Active modes of transport, such as walking and cycling, as well as light electric mobility and micromobility devices play a very important role in promoting sustainability in the transport ecosystem of cities. The European Commission recognises this in the EU Urban Mobility Framework adopted in 2021, which states that "a clear priority should be placed at national and local level on the development of public transport, walking and cycling, as well as connected, shared mobility services".

The members of the Commission Expert Group on Urban Mobility (EGUM) strongly believe that the improvement of road safety in Europe, and the ambition to achieve zero road deaths and serious injuries, requires, *inter alia*, strong policies that support, promote and protect everyone who chooses to walk and cycle. The latest Commission road safety statistics underscores this: within urban areas, pedestrians, cyclists, users of light electric mobility, micromobility devices and of powered two-wheelers represent just under 70% of total road fatalities. These fatalities occur overwhelmingly in collisions [1] involving cars, trucks and busses. In other words, the need to protect 'vulnerable road users must continue to be the EU's most urgent road safety priority. Having more EU citizens use active travel brings a host of associated benefits to society, from improved health outcomes to lower CO_2 emissions and improve air and noise levels in cities. This is why it is urgent for the EU, national, regional and local authorities to make the roads as safe as possible for people who walk, cycle and use light electric mobility and micromobility devices [2].

The EGUM welcomes the opportunity to contribute its expertise to the Commission. The EGUM, and its related sub-group on active mobility and road safety for 'vulnerable road users,' has been a very valuable method for harnessing the expertise of urban public authorities, Member State transport ministries, industry, academia and civil society organisations.

In this paper, the EGUM presents the Commission with recommendations on how the EU's Road Safety Policy Framework 2021-2030 can be improved for 'vulnerable road users' [3] at the midpoint of its delivery.

2. SUMMARY

The report and the following recommendations are based on the work of EGUM sub-group 5 focusing primarily on active mobility and road safety for vulnerable road users. Many sub-group members have contributed case studies, evidence and content recommendations, including from representatives of the:

- Portuguese Institute for Mobility and Transportation
- Austrian Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology

[1] ISO 12353-1:2020 establishes a comprehensive vocabulary related to the investigation and analysis of road traffic collisions and it also includes terms used in this domain.
2 For definition see the ITF-OECD Report on Safer Micromobility (2021)
[3] For definition see the EU Directive 2019/1936

- Italian Ministry of Transportation
- Irish Road Safety Authority
- Danish Road Directorate
- The Region of Flanders, Belgium
- BKK Center for Budapest Transport, Hungary
- The city of Utrecht, Netherlands
- The city of Amsterdam, Netherlands
- ERTICO
- Micro Mobility for Europe (MMfE)
- EUROCITIES
- The International Federation for Automobiles (FIA)
- The European Association of Motorcycle Manufacturers (ACEM)
- The Light Electric Vehicle Association (LEVA-EU)
- The Alliance for Logistics Innovation through Collaboration in Europe (ALICE)

EGUM sub-group 5 members were invited to complete an online survey beginning in November 2023 to harvest their views on the EU Road Safety Policy Framework, and to source evidence, case studies and other information useful for developing recommendations. Survey responses were discussed at subsequent meetings, with an initial draft content shared at a sub-group 5 meeting on 5 February 2024.

A second draft report has been submitted to the sub-group members on 28th February 2024.

A third draft report and recommendations has been submitted to the sub-group on the 14 March 2024 and a final draft was submitted on 31st May 2024, receiving diverging views on some points only by one sub-group member.

At the EGUM plenary on 10th June 2024 a diverging views document has been discussed, to be submitted together with the main text to the plenary for the final approval on 4th July 2024.

Road safety at the urban level also falls within the remit of the EU; it is not just for Member States. For that reason, recommendations to the Commission focus on what it can do at the mid-term of its Road Safety Policy Framework to improve implementation for Vulnerable Road Users.

3. DEFINITIONS AND INITIAL STATEMENTS

3.1 While the EGUM recognise that 'vulnerable road users' and 'VRUs' will continue to be used and, in some cases, simply cannot be avoided, we do believe that the Commission can demonstrate leadership on road safety by always highlighting the desirability of people who walk (instead of pedestrians), cycle (instead of cyclists) and use light electric mobility, micromobility devices and powered two-wheelers for their journeys.

- The EGUM recognises that 'vulnerable road users' is defined in EU law as "non-motorised road users, including, in particular, cyclists and pedestrians, as well as users of powered two-wheelers," as defined in Directive (EU) 2019/1936 on road infrastructure safety management.
- The EGUM also recognise that 'vulnerable road users,' or 'VRUs,' is used internationally in the academic, policy and political mobility and transportation discourse. The EGUM also recognises that a better definition should include light electric mobility and micromobility devices.
- Powered two-wheelers offer useful mobility solutions, and they can help combat congestion in cities. The benefits offered by PTWs should be accompanied by well-tailored specific safety measures. Therefore, PTWs should be integrated into mobility and safety plans by national and local authorities. The EGUM recognise the importance for VRUs to comply with road traffic rules, for their own safety and for contributing to reduce collisions.

- However, the EGUM strongly believes that 'VRUs' is a disempowering label and strips the people it is meant to describe of their agency. People described as 'vulnerable road users' are in fact "valuable road users", as they reduce the motorised vehicles' prevalence on the urban roads. These benefits are widely documented in academic and policy literature and endorsed by the World Health Organization, among others.

3.2 Knowledge is a key factor for evidence-based policies. The Commission should work with national governments to address the issue of under-reporting of road collisions, especially among people who walk, cycle, use light electric mobility and any other kind of micromobility device, to acquire more accurate knowledge of the state of road safety in the EU. Member State governments should implement their commitments in the Valletta Declaration to report "reliable and comparable data using a common definition based on the MAIS3+ trauma scale".

- Under-reporting of road collisions means that neither the Commission nor Member States and local authorities have as good an understanding as can be on the safety of the roadways. There are many instances in which people who walk or cycle experience risk and danger on the roads and do not report it to law enforcement, even if these situations require medical attention and cause injury to the victims.
- Negative road safety experiences, particularly with motor vehicles, is a major contributor to people's decisions not to walk or cycle[4] as often as they could, decisions that create many negative consequences for society.
- Pilot projects and studies in EU countries that collect data from hospitals would be a useful way to improve the EU's road safety statistical picture and to better assess how the EU is achieving its road safety objectives. Access to court records would also contribute to road safety research, as they often contain detailed documentation.
- The pilots should acknowledge and distinguish new forms of mobility, which are not visible in the statistics yet and involve shared light electric to understand the level of under-reporting in their databases as well. Thus, the Commission is strongly encouraged to devote financing to projects and studies that can achieve this.
- The Commission should encourage Member States to keep records of single pedestrian falls in traffic that result in deaths and serious injuries. The Commission should consider extending the definition of what constitutes a road "death or serious injury" to include single pedestrian falls.

3.3. The Commission should increase its efforts to work with national governments to record and collect exposure data, according to travelling distance and time for all road users, broken down by modal share and road type, to better understand the risk ratios and to acquire more accurate knowledge of the mobility profiles of people involved in road collisions.

- The current lack of exposure data contributes to a fundamental misunderstanding of the level of road safety in the EU, especially for 'VRUs'.

[4] See, among others: UK Dept. of Transport (2014), National travel survey England 2013. Some 40% of parents in the survey sample said their children were driven to school, while 56% said they usually walked. However, the most recent survey suggested only 46% of children walked to school regularly in 2013. Parents said their biggest fears outside schools were speeding traffic (30%), strangers approaching their children (23%) and unsafe parking by other adults (17%). Only 7% of children walked to school alone, with parents citing speeding and heavy traffic on busy roads, children not paying attention to traffic and worries about approaches from strangers as the main reasons.

- For example, merely counting the number of cyclists who are killed on the roads in a city or country without analysing how many people cycle on average leads to a skewed understanding of the level of risk. Cities or countries with low levels of cycling will have fewer recorded collisions involving cyclists and will thus seem like safe places to cycle, whereas cities or countries with very high levels of cycling will have more recorded collisions involving cyclists and will this seem like rather dangerous places to cycle.
- The Commission should incentivise local authorities to better count pedestrians and cyclists, and people who use other forms of light electric mobility and micromobility, and to record how people in these categories behave in traffic and their self-reported experiences on the roads and perceptions of safety. This can be done through local counting initiatives and through travel surveys. The Commission could propose a common methodological framework to ensure harmonised data collection and consider requesting Member States to conduct national mobility surveys every two years.
- A specific situation that merits investigation from local authorities and public transport agencies is that of intermodality. This includes investigating pedestrian accessibility, street crossings, desire lines, lighting, and barrier-free platforms, for example. All these factors can enhance or inhibit, if done poorly, the use of public transport.
- Further investigation is recommended on the effects of the use of active and passive safety devices for VRUs.

4.RECOMMENDATIONS

Below are six recommendations to the Commission proposed in order of priority, according to our estimation of their impact on people who walk, cycle and use light electric vehicles, micromobility devices and powered two-wheelers. We are aware that their implementation falls under a shared responsibility of different administrative levels (such as local authorities and road owners) and public transport agencies.

4.1. The Commission should issue a formal recommendation to national, regional and local governments to implement a 30 km/h speed limit in urban areas. It would be a very constructive first step, and one we believe is firmly aligned with the EU Urban Mobility Framework and the Commission's Road Safety Policy Framework.

- Excessive motor vehicle speed continues to be a prominent factor in collisions involving vulnerable road users [5].
- Among the most relevant information, data on the speed of motor vehicles that are involved in crashes with vulnerable road users should be collected universally across the EU, following common rules.
- The EGUM believes that all urban areas in the EU should implement 30 km/h speed limit.[6] Having the Commission issued a formal recommendation on this is a very constructive first step, and one we believe is firmly aligned with the EU Urban Mobility Framework and the Commission's Road Safety Policy Framework.
- Many cities and regions that have implemented 30 km/h speed limits have observed measurable decreases in collisions between motor vehicles and in collisions with people

[5] Among the countries that monitor levels of speed compliance on urban roads countrywide, between 35% and 75% of vehicle speed observations are higher than the legal speed. ETSC PIN Report on Reducing Speeding in Europe. https://etsc.eu/reducing-speeding-in-europe-pin-flash-36/. The Netherlands, for example, reports 70% of car drivers exceed the speed limit in 30km/h zones.

[6] See also the WHO Campaign launched to make 30 km/h streets the norm for cities worldwide.

walking and cycling[7] as well as a reduction in the severity of consequences. Slower motor vehicle speeds also decrease noise and air pollution and increase the feeling of safety among people who want to walk, cycle or take public transport.

4.2. The Commission should progress on its objective to develop quality requirements of road infrastructure for 'VRUs', as foreseen in Directive (EU) 2019/1936 on road infrastructure safety management to ensure that road infrastructure for people who walk and cycle is created to a sufficiently high standard across the EU.

- Minimum requirements for improving existing road infrastructure and creating new infrastructure is essential for reducing road deaths and serious injuries among people who walk, cycle, use light electric vehicles, micromobility devices and powered two-wheelers. Such requirements should eventually be incorporated into EU law to complement (and not overrule) existing and high-quality infrastructure guidelines.
- The Commission should, together with Member States, develop a new EU KPI on pedestrian, cyclist, light electric mobility and power two-wheeler infrastructure safety as part of the KPIs in the EU Road Safety Strategy.
- EU shared guidelines, based on a common functional classification of the road network, should be fundamental for future Regulations and Directives.[8] Even if the road standards for geometric design takes "forgiving roads" into account, this doesn't always consider 'VRUs'. Self-explaining roads should form part of new road design, for the existing road network changes should be made to make them self-explaining. Identify high risk segments for treatment and assign budget so that benefits should be seen in terms of lives saved and injuries prevented swiftly
- Training and safety awareness campaigns to cargo-bike drivers and business that use cargo-bikes for delivery will protect workforce of logistics but also increase social benefits of use of cargo bike.

4.3. The Commission should develop more knowledge and competence on the issue of distraction by motor vehicle users as this is a prominent cause of motor vehicle collisions with other road users.[9] Eventually, the Commission should propose guidance and new regulation to reduce and minimise distraction, such as through standards for the use of touch screens in motor vehicles, and rules against the use of mobile phones while driving.

- The automotive industry continues to develop technology for cars that significantly increases the risk that drivers become distracted while driving. This hugely increases the risk of collisions with other road users, especially vulnerable road users. Hence, the EGUM believes it is urgent for the Commission to study this issue in-depth with the goal of developing guidance and then regulation to minimise the risk of distraction in motor vehicles.

[7] In Copenhagen, this measure has led to a 77% reduction in collisions and 88% in injuries in three years; in London collisions have fallen by 40% and injuries by 70%. In Graz (Austria), one of the first cities in Europe to introduce a 30 km/h zone for the entire urban area, after the first 6 months there was already a 24% reduction in serious collisions. See also OECD-ITF, Speed and crash risk, 2018 (https://www.itf-oecd.org/sites/default/files/docs/speed-crash-risk.pdf).

[8] The European Commission is contracting a study project on "Guidance on the design of "forgiving roadsides", "self-explaining and self-enforcing roads", as well as on the quality requirements of road infrastructure for vulnerable road users", in accordance with Article 4 (6) of the amended Directive 2008/96/EC (on Road Infrastructure Safety Management), regardless the fact that this Directive shall apply, in general terms, only to roads which are part of the Trans-European Road Network, to motorways and other primary roads.

[9] See among others: ETSC, How traffic law enforcement can contribute to safer roads, PIN Flash Report 42, March 2022 (https://etsc.eu/wp-content/uploads/ETSC_PINFLASH42_v2TH_JC_FINAL_corrected-060522.pdf) and "Distraction and fatigue", ESRA thematic report no. 3, Research report number: 2016-T-03-EN, 20/06/2016 (https://www.vias.be/en/research/notre-publications/esra-2015-thematic-report-no-3-distraction-and-fatigue/)

- The Commission should encourage member states to include as much as possible data on distraction in their reporting to the European Commission's CARE database of road collisions.

- The Commission should update the 2004 EC Recommendation on Enforcement in the field of Road Safety to include the latest best practice guidelines on enforcement and sanctions against illegal use of mobile phones and adopt a new EU Key Performance Indicator on the enforcement effort (e.g. number of violations detected and sanctioned) over time

4.4. The Commission must regulate safety technologies, assisted and automated driving systems, to ensure they operate in a completely safe manner, in particular in their interactions with people who walk, cycle and use light electric vehicles, micromobility devices and powered two-wheelers.

- The Commission should strengthen the rules for assisted driving systems to avoid that drivers overestimate their capabilities and tend to over-rely on them, treating them as if they are automated driving systems that do not require human supervision, creating new threats for other road users.[10]
- The speed difference between different vulnerable modes has grown over the last decade. Many new light electric vehicles are on the road, without being (properly) recognised in EU technical legislation and national traffic codes. This lack of recognition and ensuing adequate legislation, creates risks for the users of these vehicles. Without this recognition, the users of the vehicles cannot be properly protected on the road. Harmonised technical rules, road traffic rules and road safety statistics must be adapted to include these vehicles. The Commission must develop harmonized technical legislation and mandate related standards, specifically for these vehicles in close consultation with the light electric vehicle sector. The Commission must consult and cooperate with the Member States on streamlining traffic codes for light electric vehicles and on fully acknowledging light electric vehicles in road infrastructure.[11]
- The Commission should require a high level of performance of Intelligent Speed Assistance systems (ISA) to be fitted in all new motorised vehicles,[12] and not just speed warning technologies in the next iteration of the EU vehicle safety type approval legislation.

4.5. The Commission should propose regulation to limit the design, weight[13] and power of motor vehicles, similarly to what has been done to improve the safety of car fronts,[14] as a crucial way to decrease road deaths and serious injuries.

- The growth of the height, width and weight of motor vehicles creates a major risk of death and serious injury for all road users, particularly people who are walking and namely children, the elderly and other road users with reduced mobility and orientation.

[10] See: Commission Implementing Regulation (EU) 2022/1426 of 5 August 2022 laying down rules for the application of Regulation (EU) 2019/2144 of the European Parliament and of the Council as regards uniform procedures and technical specifications for the type-approval of the automated driving system (ADS) of fully automated vehicles (Text with EEA relevance) and the UNECE Informal Working Group on Functional Requirements for Automated Vehicles (FRAV) Progress Report to GRVA (2021) – (https://unece.org/sites/default/files/2021-02/GRVA-09-28e.pdf)

[11] See, among others: https://road-safety-charter.ec.europa.eu/content/etsc-and-pacts-set-out-safety-recommendations-e-scooters-and-their-riders and SHARED-MICROMOBILITY-REPORT.pdf (polisnetwork.eu)

[12] https://road-safety-charter.ec.europa.eu/resources-knowledge/media-and-press/intelligent-speed-assistance-isa-set-become-mandatory-across

[13] Bearing in mind that e-cars are the heaviest cars on the road, so potential conflict coming up.

[14] Safe car fronts are already extensively regulated, and the EU applies the most demanding legislation worldwide regarding the protection of vulnerable road users. Since the early 2000s, there have been binding type-approval-relevant regulations for designing a pedestrian-friendly car front in the EU. Starting with 2003/102/EC, the requirements have since been revised, tightened and adapted in several amendments. This has contributed to significant changes in vehicles and thus to greater protection for vulnerable road users. These kinds of requirements are currently set out in the ECE R127 version 02 and are mandatory for every new type approval within the EU. As part of the GSR2, the ECE R127 was recently transferred to version 03, which explicitly includes cyclists in its scope.

- As motor vehicles are already a form of road transport carrying the most risk of death and serious injury, allowing ever larger and heavier motor vehicles onto the EU's urban roads will severely backtrack the EU's progress on its road safety objectives and will endanger many more lives. The Commission must undertake all efforts to ensure that the size and weight of motor vehicles are regulated and work with the MS and cities on policies discouraging "growing" vehicles, for instance by differentiating parking fees according to the space occupied by parked cars, fees for low emissions zones, congesting charging, taxation, etc.

- The Commission should recommend, within the context of the next iteration of the motor vehicle General Safety Regulations, that motor vehicles should be fitted with speed limiters and not just speed assistance/warning systems. Technology exists to physically restrict the speed of motor vehicles to existing legal speed limits, a measure that would have a substantial impact on road safety.

- The Commission should also develop guidance on improving the passive safety of motorised vehicles within the context of the next iteration of the motor vehicle General Safety Regulations. The high front ends of most EU motor vehicles are significantly worse performing than smaller vehicles in crashes with people walking; this needs to be explored and the EU and UN regulations on pedestrian protection appropriately updated.

4.6. TEN-T infrastructure should prioritise road safety and the ability of people to safely walk, cycle and use light electric vehicles and micromobility devices. Thus, the Commission should ensure that professionals who inspect and audit TEN-T roadways receive specific training on road safety considerations for vulnerable road users.

- There are thousands of places around the EU where vulnerable road users are exposed to, and share the roads with, motorised users of the TEN-T network. Many TEN-T infrastructure sections are not planned and built in a way that can safely accommodate people who choose to walk and cycle, even if many TEN-T roadways can improve mobility for domestic users and not just users who are driving long distances or cross-border.
- For example, many TEN-T roadways cut-off major and well-established cycle routes and function as a nearly impenetrable barrier. Training auditors and inspectors to identify the concerns and needs of vulnerable road users can improve future planning of TEN-T roadways and improve existing infrastructure, which in turn can make these roadways safer for more users. The action to ensure that auditors are also trained in pedestrian and cyclist safety could also occur within the context of the Forum of Auditors due to be set up by the EC as included in their Road Safety Strategy.[15]

[15] 'EC will facilitate exchange of experience on Safe System methodologies between practitioners (e.g. in a Forum of European road safety auditors)' in European Commission (2019) EU Road Safety Policy Framework 2021-2030- Next Steps towards "Vision Zero". https://bit.ly/2XXX8Xh

5. Annex I

Diverging views:

5.1 ACEA

ACEA has participated in the discussions but does not endorse the final recommendations.

5.2 ALICE

ALICE, the Alliance for Logistics Innovation through Collaboration in Europe, being part of EGUM, ***does not fully endorse*** ***recommendation 4.5: Commission should propose regulation to limit the design, weight and power of motor vehicles...,*** *and particularly these paragraphs when the scope is commercial vehicles:*

- *The growth of the height, width and weight of motor vehicles creates a major risk of death and serious injury for all road users, particularly people who are walking and namely children, the elderly and other road users with reduced mobility and orientation.*
- *As motor vehicles are already a form of road transport carrying the most risk of death and serious injury, allowing ever larger and heavier motor vehicles onto the EU's urban roads will severely backtrack the EU's progress on its road safety objectives and will endanger many more lives. The Commission must undertake all efforts to ensure that the size and weight of motor vehicles are regulated and work with the MS and cities on policies discouraging "growing" vehicles, for instance by differentiating parking fees according to the space occupied by parked cars, fees for low emissions zones, congesting charging, taxation, etc.*

Although the focus of this recommendation is on passengers cars, as discussed within the stakeholders in this subgroup, the current scope is general for vehicles and therefore, not excluding commercial vehicles.

Safety is of key importance for ALICE and its members. Most of our members apply strong policies and procedures to ensure safety of employees, etc. and are particularly concerned of safety of employees and road users in relation with transport operations. Improving safety and reducing risk is key, very important and not negotiable. We do agree that further regulation to improve safety e.g. vehicles fronts is important. However, being prescriptive on regulations limiting design, weight and power is not properly justified.

Weight and power of commercial vehicles cannot be seen in isolation in regards the vehicle safety implications and requirements for their operations. Improving safety of vehicles could be regulated without being prescriptive of the solution (i.e. leaving it to the OEMs to decide on the design, weight and power). Prescribing less weight and power may hamper the logistic and commercial vehicles operation (e.g. trucks and buses) that are key to achieve efficiency in the urban transportation system. Prescribing the way to increase safety of commercial vehicles may create other externalities that have not been properly assessed. Particularly, electric commercial vehicles are heavier than conventional fuelled vehicles and reducing vehicle of weights overall will slow down the road freight transport electrification. We agree with speed limitation and increasing passive safety of vehicles. Additionally, we would recommend the authors and the EC to ensure inclusivity of large families when planning future regulations.

6. Full list of organisations participating to the “Active mobility and safety of vulnerable road users” subgroup

Subgroup leaders
European Transport Safety Council
European Cyclists’ Federation
Cities and Regions
Barcelona
Budapest
Helsinki City
Karditsa
The Hague
Toulouse Métropole
Vitoria-Gasteiz
Member States
Austria
Belgium
Czechia
Denmark
France
Italy
Latvia
Lithuania
Luxembourg
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ERTICO
Eurocities
LEVA-EU
MaaS Alliance
Micro-Mobility for Europe
POLIS
T4SM
Observers
Committee of the Regions
JRC