

Response from Brake, the road safety charity, May 2006

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Introduction

Brake is a national road safety charity. Our division, the Fleet Safety Forum, is concerned with safe operation of commercial vehicles and vehicle fleets by company managers. We have a long-standing concern about blind spots and the need for greater fitment of mirrors. To read more about our work, please visit www.brake.org.uk and click on the Fleet Safety Forum button on the home page.

Brake's response to the consultation

Brake welcomes this consultation to improve truck drivers 'blind spot' visibility, which would build on existing measures by requiring the existing population of trucks to be retrofitted with additional visibility aids.

As the consultation paper shows, fitment of such aids could prevent a substantial number of deaths and injuries on European roads from 2008-2020 and bring significant cost savings for a comparatively minimal cost to operators.

In fact, Brake believes that the potential cost benefits of retrofitting blind-spot visibility aids are likely to be even greater than those outlined in the Jacobs report, which only considers fatal crashes. The report does not look at the costs associated with serious or slight injury crashes, which are far greater in number and can have higher associated financial costs than fatal crashes, for example costs associated with hospital treatment. This type of cost to 'society' when death and injury occurs on the road (e.g. sickness and disability benefits, cost to health services of treating traumatised injured and bereaved victims) tend to be difficult to quantify and are typically not considered in cost-benefit analyses.

It is worth mentioning that there are also additional costs to operators when death or injury occurs, such as increases in insurance premiums and loss of business, so it is in businesses' interests to do all they can to minimise risk – fitment of extra blind-spot visibility aids is one simple way to do this.

For these reasons, and given the low costs of retrofitting trucks with blind spot mirrors (particularly in relation to the cost of buying a new truck), Brake urges the European Commission not to exclude older vehicles from the proposed regulations. If the EC were to allow all types of mirrors or visibility aids which meet the field of vision requirements for EC directive 2003/97/EC (including additional blind spot mirrors and nearside visibility camera systems), rather than simply requiring a replacement of class IV and V mirrors and housings, it would be technically feasible for all trucks to be able to retrofit suitable blind spot visibility aids. In fact, some additional blind spot mirrors and cameras have the advantage of covering a much wider field of vision than specified by these proposals.

Brake is concerned that the minimum field of vision provided by the retrofit mirrors stipulated in the consultation paper is smaller than the field of vision required for new trucks, as stipulated in EC directive 2003/97/EC. Brake urges the EC to base the proposed new directive on the minimum field of vision stipulated in EC directive 2003/97/EC – not on a reduced minimum field of vision, or on a particular type of mirror. This would allow fitment of additional blind spot mirrors (which the consultation paper itself identifies as having a possible advantage over the mirrors stipulated in the proposal) or of nearside visibility camera systems covering this field of vision. This approach would promote competition amongst manufacturers to provide cost-effective solutions. Increasing the required field of vision would also help to maximise potential road safety benefits.

Enforcement resources

It is vital that enforcement of the proposed directive is thorough. Brake has serious concerns about under-resourcing of VOSA, the government agency enforcing commercial vehicle safety in the UK, which is resulting in too few enforcement officers on our roads conducting spot checks of commercial vehicles, and high levels of breaches of mechanical and paperwork regulations among a significant minority of law-breaking operators. The EC should put pressure on member states to carry out minimum levels of enforcement of the proposed directive.

Education campaign:

We believe that the implementation of this proposal should be combined with two EC-led education campaigns:

1. an education campaign on the importance of using all visibility aids fitted to vehicles to look out for vulnerable road users aimed at truck drivers and fleet managers;
2. an education campaign aimed at the road users who are most vulnerable around large vehicles, including children, pedestrians, cyclists and motorcyclists.

Brake also recommends that the EC should stipulate additional requirements for member states to introduce in driving tests to ensure drivers understand how to use all of their mirrors and visibility aids.

Additional measures required to further increase the safety of vulnerable road users around large vehicles:

There is much more that needs to be done by EC member states to increase the safety of easy-to-miss vulnerable road users – pedestrians, cyclists, motorbikers – aside from increasing visibility in vehicles. In particular, the best way to ensure pedestrians and cyclists are safe is to provide adequate pavements, cycle paths and crossing places. In many areas these are not available and cyclists are forced to share narrow road space on fast roads, and people on foot in rural communities are forced to walk on roads without pavements. This reality adds weight to the need to do everything possible to increase the vision of drivers.

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