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New Mirrors on Existing Trucks

In the consultation paper dated 12 April 2006, the European Commission has asked for comments to the problems concerning blind spot mirrors and retrofitting of old trucks.

Below DTL would like to offer its comments to the consultation paper. The comments mainly focus on the following three elements:

1. The technological development (camera, radar, etc) which is expected to provide improved conditions with regard to the field of vision from trucks.
2. Improved behaviour in connection with adjustment of mirrors as well as establishment of facilities which will help to achieve the correct adjustment of mirrors – mirror control facilities – and the correct control.
3. A report on the right-hand turn accidents which will be published in Denmark in the autumn of 2006. The conclusions of the report will help to define the measures required and best suited for improving the field of vision and avoiding accidents.

Do the benefits of retrofitting old truck outweigh the costs?

In Denmark, the rules on additional mirrors on existing trucks entered into force on 1 October 2004. Denmark has chosen to allow the “blind spot” (doblo) mirrors or cameras as a supplement to the indirect field of vision. The rules apply to all trucks regardless of their age. During the recent year, all newly registered trucks have been equipped with mirrors of class II, IV and V according to the existing rules.

Since the introduction of the “blind spot” mirrors and/or camera systems, there has been no indication of any significant reduction in the number of right-hand turn accidents. In 2004, the Danish transport sector invested an estimated amount of 10 million EUR in new mirrors, but until now, the investments have had no positive impact on the number of accidents.

If it should be required that all existing Danish trucks have to comply with Directive 2003/97/EC, the Danish hauliers will suffer heavily. Partly because of the investments already made, partly because of the large share of Volvo and Scania trucks in Denmark. According to the information available, the trucks can only be upgraded to Directive 2003/97/EC through replacements of the complete mirror housings on both the right and left sides. According to the proposal, the curvature on the Class II mirror must be the same on both sides of the truck.

We assume that class VI mirrors are not included in the considerations made by the Commission.

Is the approach the correct one or are there alternatives?

The costs involved in the retrofitting of mirrors will be very high. It should therefore be considered if any alternative approaches are available for trucks which cannot be equipped with the old mirror housings.

The roadside investigations made by the police show that the mirrors on many trucks are not adjusted correctly and therefore the present potential of the mirror is not fully used.

We would therefore recommend a very thorough investigation of the causability between mirrors, technical solutions, road design, and the behaviour shown by the driver and road user prior to the enforcement of the legislation for existing trucks.

The technical development progresses very quickly. Many committed researchers from large vehicle manufacturing companies, research institutes and inventors are working on solutions to the blind spot problem. It may be expected that within a few years, a number of technical solutions will, wholly or partly, take over the monitoring of the blind spots. The quality of a technical monitoring system will probably exceed the quality of the manual monitoring made by the driver today.

The technical solutions, such as radar, infra red light and camera surveillance, are feasible solutions for vehicles which cannot be retrofitted with new large mirrors without considerable costs.

Other comments

This spring, the Danish accident investigation board on road transports will publish the results of an in-depth study of 25 accidents involving right-hand turning trucks - the expected time of publication is week 41/2006. The study includes the different causes of this type of accidents, e.g. the behaviour of the driver at the time of the accident, the position and fitting of the mirror on the trucks causing the accidents and a number of other conditions which may influence the factors leading to the accident. With this analysis, we will have a better platform for proposing measures which could minimize the number of this type of accidents.

DTL will revert with the results of this analysis when it is available, but would already now like to invite the Commission to visit Denmark in the spring of 2006 for discussion of the results and the consequences for the future work.

During their investigations, the Danish police have found that the mirrors on every second truck are not adjusted correctly. It would therefore be advisable to concentrate the efforts on the correct adjustment of the mirrors rather than the retrofitting, as the contribution to improved road safety may be more significant when the mirrors are adjusted correctly.

In connection with the new legislation in this area, the rules should be defined in a way which will allow objective control. The position of the mirror is individual and adapted to each single driver. The main conditions are the driver's height and his position in the cabin. We would therefore recommend that a code of practice is introduced to control the correct position of the mirrors with respect to the individual requirements of each driver.

In DTL's opinion, the current mirrors provide the best possible view of the "blind spots". The development of technical solutions to new monitoring systems is progressing with great speed, and the mirrors will probably be outdated in a very short period of time.

Together with other relevant organisations, DTL participates in the work headed by the Danish Road Directorate with the purpose of designing facilities for mirror controls which can be used for practical training of the drivers. The first pilot project was in operation in May 2006, and after a trial period, the same type of facilities will be established all over the country in the autumn of 2006. Further information on the project will be distributed when the pilot project is finished.

In the short run, the largest gains with respect to road safety will be obtained through education of the driver in the correct adjustment of the mirrors, a code of practice outlining the control measures defined by the authorities and information campaigns which involve other types of traffic. In the long run, the different technical solutions will help the driver to avoid "blind spot" accidents.

If the Commission will visit Denmark later this year, we hope that we will have the opportunity to present the facilities to the Commission.

Yours sincerely