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Your ref

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**Comments on the EU Initiatives on Road Safety – Fitting of Blind-Spot Mirrors on existing trucks and Road Infrastructure Safety Management on the Trans-European Networks**

Reference is made to your e-mail of 18 April 2006 regarding call for comments on EU Initiatives on Road Safety. Below you will find the Norwegian comments on the above mentioned initiatives.

**1) Comments on the Consultation paper TREN-E3 of 12 April concerning Fitting Blind-Spot Mirrors on Existing Trucks**

Norway supports the proposal of a retrofit of blind spot mirrors to existing vehicles above 3.5 tonnes. This legislation can clearly reduce the number of accidents caused by drivers of large vehicles who are not aware of other road users close to or beside their own vehicle. The approach of the Commission, as described in the Consultation paper of 12 April 2006, seems to be both sound and correct. The Norwegian road authorities also supports that it should remain with the technical inspection bodies of the Member States to decide whether alternative solutions may be applied due to the lack of technical solutions or technical changes which are not proportional to the expected benefit.

**2) Comments on the Consultation paper TREN-E3 of 12 April concerning Road Infrastructure Safety Management on the Trans-European Networks**

*1. Do you agree with the definition and assessment of the problem?*

It is of course correct to stress that road accidents constitute a big problem, and to underline the ambitious objective to reduce the number of killed by 50 % is relevant. It should, however, be born in mind that the 50 % target is related to all fatalities and

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the major part of the fatalities is the result of accidents outside the Trans-European Network. This limited network is probably the safest part of the European road network (at least as killed per million vehicle kilometre).

Reference to EURORAP, does not fit in the problem definition. If anything it could be seen as part of the solution, but certainly not the problem. On the other hand the Norwegian road authorities take on a somewhat different approach than the one chosen by EURORAP. In the future we will approach the problem in such a way that we take actions (introduce safety measures) where they have the greatest safety potentials, and not where the individual risk to road users is the highest, as suggested by EURORAP.

2. *Do you agree with the policy options defined, and assessed?*

Policy option 1 (no change) has in the past proven not to be sufficient in order to achieve the targeted reduction in the number of killed. The exchange of best practise is undoubtedly a valuable tool we need to explore further and improve. However, we do not believe that sharing of best practise alone is enough.

Furthermore, there are such big differences in road safety approaches between some of the old and well performing member states and some of the new member states that it will be nearly impossible to define a detailed Community legislation (policy option 3) that will fruitfully serve the two groups. Norway will therefore strongly support policy option 2, indicating that a directive should give indications as to "what to do", but not necessarily "how to do it". Hence indicating that one can chose slightly different approaches depending on the initial accident situation and safety performance in each country.

3. *What is your opinion on the measures/instruments described in point 4? What other measures could be taken?*

The paper describes four different safety procedures, impact assessment, safety audit, network management and safety inspection. Impact assessment, safety audit and safety inspection have proved to be important instruments, given that they are handled in a professional manner. The network management includes black spot treatment. Black spot treatment has proven to be a very efficient tool at an early stage of road safety work, and many of the old member states have successfully conducted black spot management for decades. This has been one important element in their success. Given that they have treated the most important black spots they are now embarking on a wider network management which is a more comprehensive network consideration. However, more elementary black spot management can be very fruitful in many of the countries with poor accident records.

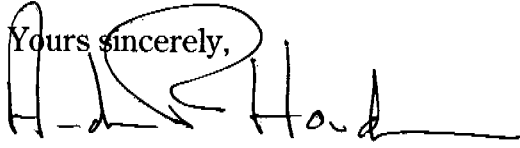
Currently the Conference of European Directors of Roads (CEDR) is preparing fact sheets with harmonized definitions for the infrastructure safety instruments which

are presented in the document, and it is hoped that these elaborated definitions can be adopted at the EU level.

4. *Do you have specific comments on the costs and benefits of the different instruments/measures?*

Available cost and benefit data for the different instruments will be presented in the above mentioned fact sheets from the CEDR.

Yours sincerely,

*for*   
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