



The Road Haulage Association Ltd

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17th May 2006

European Commission
Directorate General for Energy and Transport
Road Safety Unit - "Blind Spot"
Rue de la Loi 200
1049 Brussels
Belgium

Dear Sir/Madam

**FITTING BLIND-SPOT MIRRORS ON EXISTING TRUCKS - A CONSULTATION PAPER
PRESENTED BY THE INLAND TRANSPORT SERVICES OF THE DIRECTORATE
GENERAL FOR ENERGY AND TRANSPORT**

Please find below the response to the above consultation from the UK Road Haulage Association.

The Road Haulage Association (RHA) is the primary trade association representing the hire-or-reward sector of the UK road freight transport industry. The association comprises 10,000 member companies, operating between them 90,000+ commercial vehicles and employing some 250,000 staff. Members range from single vehicle owner-drivers right through to multi-national fleet operators.

As well as lobbying on behalf of the membership, a major part of the associations remit is to ensure that the road freight sector has the knowledge and ability to operate in a safe, legal, efficient and environmentally aware manner.

The comments attached are intended to assist in the decisions arrived at with regard to the Commission's intention to introduce a directive on the retrofitting of "blind-spot" mirrors to heavy goods vehicles.

Yours sincerely

**Steve Biddle
Head of Technical Services**

Fitting of Blind Spot Mirrors on Existing Trucks

General Comments

The RHA welcomes and supports the use of technology to aid in road safety. However the effectiveness of any such device or equipment must be weighed against the overall cost of fitment and continued maintenance.

1. Do the benefits of retrofitting existing trucks built in or after 1998 outweigh the cost?

We believe that it would be premature to impose mandatory retrofitting on existing trucks without the necessary study evidence that would support the unqualified assumption of reduced incidents. The cost to retrofit up to 4 million heavy goods vehicles would be considerable, especially as many of the vehicles will not be able to complete a simple retro-fitment. It is known that some current mirror housings will not be able to be fitted with a wider view mirror, so a complete change of mirror and housing would be required.

2. Is the approach, including the discussion of alternative solutions, the correct one?

It is too early to decide what the correct approach should be. This cannot be agreed until verifiable research has been completed that shows what actually causes the incidents that are reported. An investment in educating the general motorist would help all road users to better understand that there are blind spots on all heavy goods vehicles, which should be avoided. It should not be the sole responsibility of the HGV driver and his/her employer to shoulder all the responsibility of reducing incidents and deaths.

3. Do you have any other comments or questions?

Road safety is a major concern to the transport industry, but this sector alone should not be expected to finance a reduction in blind spot incidents. New vehicles are now being manufactured with the new class IV and V mirrors fitted, which will lead to a reduction in older vehicles that are presently supplied without these mirrors. Surely a package of incentives to persuade operators to accelerate their purchase of newer vehicles would benefit road safety as well as assisting all member states to reduce the number of older vehicles on the roads, thereby improving the environment and bringing us closer to the reduced levels of pollution required for compliance with the European Air Quality Directives.

Conclusion

Although we acknowledge that it is a responsibility of the Commission to improve safety on our roads, we cannot support the introduction of a directive that would undoubtedly bring commercial difficulty to a large percentage of the European Road Haulage Sector.