



## **PUBLIC CONSULTATION ON AN EU STRATEGY TO REDUCE INJURIES RESULTING FROM ROAD TRAFFIC ACCIDENTS**

### **1. MAIN CONCLUSIONS**

The consultation attracted 154 responses. The participants are mainly citizens as well as road safety experts, research bodies, universities and road users or victim associations that are interested in road safety.

The findings of the public consultation clearly indicate that road safety is regarded as a priority on the political agenda. Moreover the EU added value of an initiative that addresses injuries due to traffic has been acknowledged. Target setting and support of exchange of best practises are seen as the two areas with the highest EU added value, while research and project funding, legislation and data analysis are following slightly behind.

Despite the fact that an overwhelming majority of respondents are broadly in favour of a target to reduce the number of injured due to road traffic accidents, a clear "feature" of how this target should be shaped does not emerge. Several contributors have suggested that specific targets should be set for cyclists, motorcyclists and urban areas, at European or at national level, and – where possible – combined with a general target.

As regards the statistics and the evaluation of injuries, the majority of respondents felt that a common EU definition of serious injuries was needed. Any definition of a serious/slight injury should be based on the medical severity score of the injury rather than on other methodologies. This approach would lead to a systematic improvement in the current statistics and provide systematic in-depth analysis across the EU. In order to resolve the problem of underreporting and misreporting, respondents stated that their preferred solution was to complete the link between police and hospital records, following each individual accident, which could have a significant spill-over effect on the industry.

Those who participated in the consultation have clearly stated that the data collected should be made available to all stakeholders, in particular the car manufacturing industry and the infrastructure managers, in order to develop new devices, procedures and solutions, and to take any necessary steps to prevent accidents and to mitigate the consequences.

## **2. BACKGROUND**

The public consultation was launched as part of an initiative to reduce the number and the severity of road traffic injuries. This is one of the strategic objectives outlined in the Policy Orientations on Road Safety 2011-2020, and a priority for EU action. Accordingly, the Commission is developing a comprehensive strategy of action concerning road traffic injuries, with the help of relevant actors.

The purpose of the consultation is to provide input into the drafting of a strategy to reduce the severity of injuries resulting from road traffic accidents. The questionnaire addressed both general issues related to road safety and more specific issues on how to improve the data available on victims of accidents and the collection of such data at EU level, as well as how to target some specific groups of road users. Its aim was to arrive at a common understanding of definitions and concepts relating to casualties (in particular, the definition of serious and slight injuries), to improve the collection of data and to identify courses of action to improve prevention and intervention, including their socio-economic impact.

The consultation lasted ten weeks, from 17 April 2012 to 22 July 2012.

## **3. ANALYSIS**

### **3.1. Identity and geographical coverage**

The European Commission received 154 contributions, 131 of which were submitted electronically and 23 via e-mail or ordinary mail. In addition, 12 participants provided comments, without specifically answering the questionnaire.

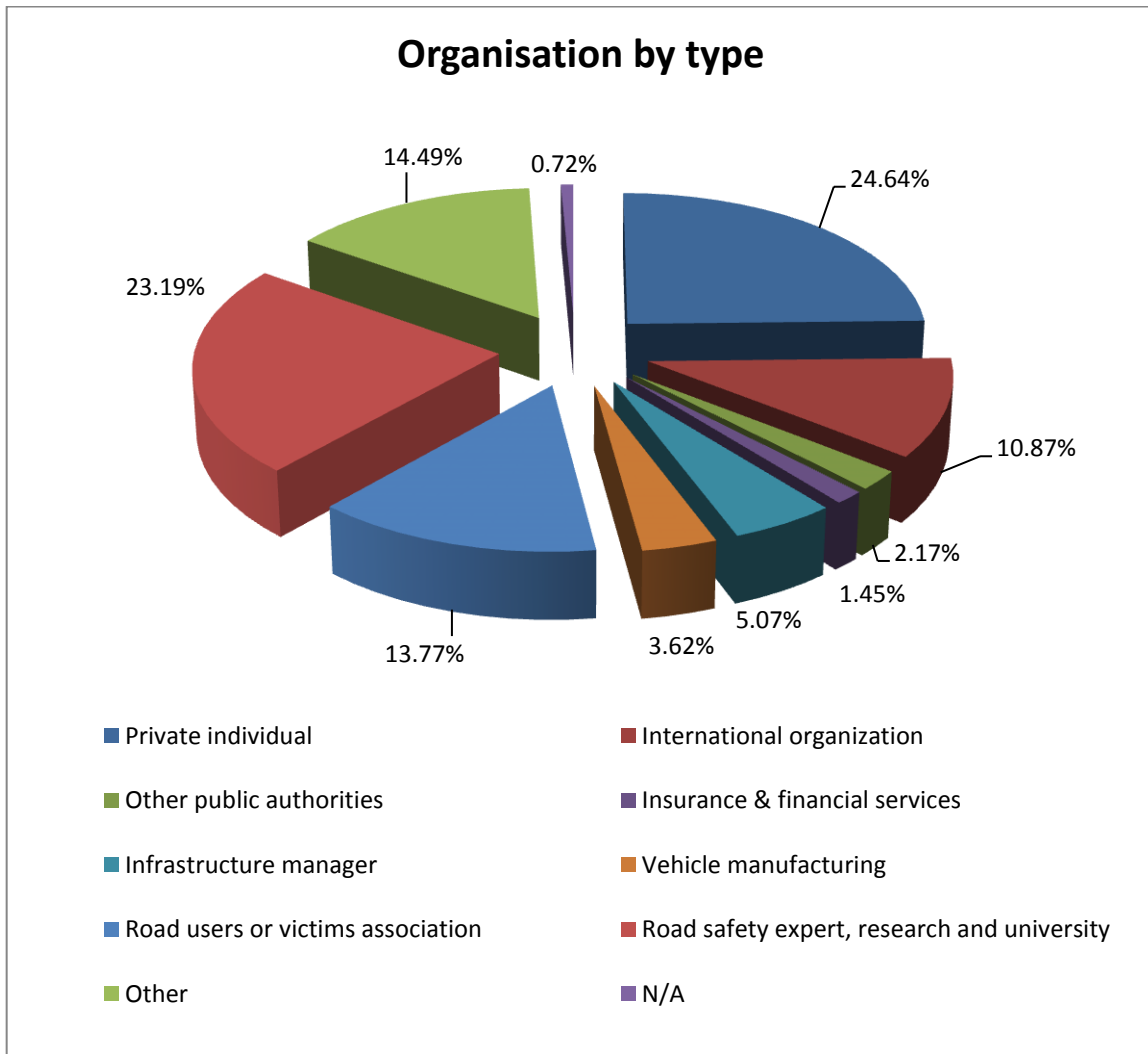
The respondents tend to be citizens and stakeholders in the field road of safety. Representatives of the police and enforcement bodies, the health, rehabilitation and emergency service sector, and providers of road transport services did not respond. However, three associations representing enforcement bodies, freight transport and logistics sector and the health sectors participated in another quality or provided a contribution outside the formal stakeholder consultation. Most of the respondents were private citizens (34 answers), road safety experts, research and university organizations.

Among the stakeholders who took part in the consultation, the following should be highlighted:

- Thirty-two road safety experts, research organizations or universities provided an answer.
- Nineteen road victim associations, including nation-wide associations contributed.
- Sixteen public authorities active in the field of road safety, including the Transport Ministries of four Member States, and the road administrations of two EEA countries. Some regional or local authorities contribute to the public consultation.
- Five vehicle manufacturers responded to the questionnaire either directly or through a joint research centre on traumatology and accidentology.

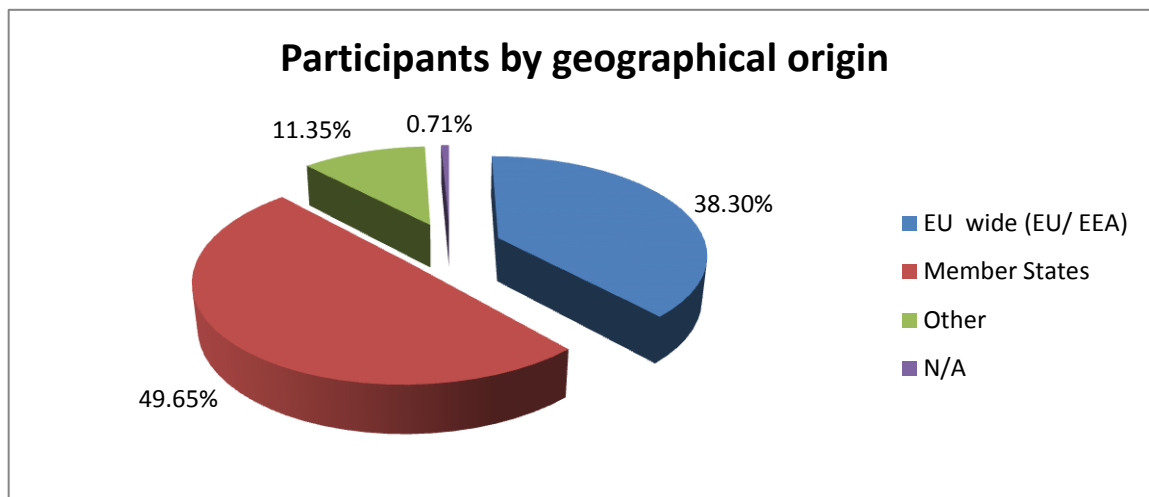
- Two manufacturers’ associations played a full part in the public consultation, and one submitted a written contribution.
- Two respondents from the insurance and financial services industry.
- Fifteen international organizations, including NGOs gave their views.
- Other organizations included a wide variety of respondents: trade union organizations representing interests at EU or at national level, and manufacturing companies.

**Graph 1 Participants by organization**



The majority of respondents are located in EU Member States, whereas 35% of respondents represent an EU-wide organization (mainly interest representation, companies and NGOs). Few respondents are from EEA countries (Norway, Iceland), and two contributions were received from a third country (Nigeria). Due to way in which the questionnaire is structured, it is not possible to collect data on the number of contributions by each individual Member State.

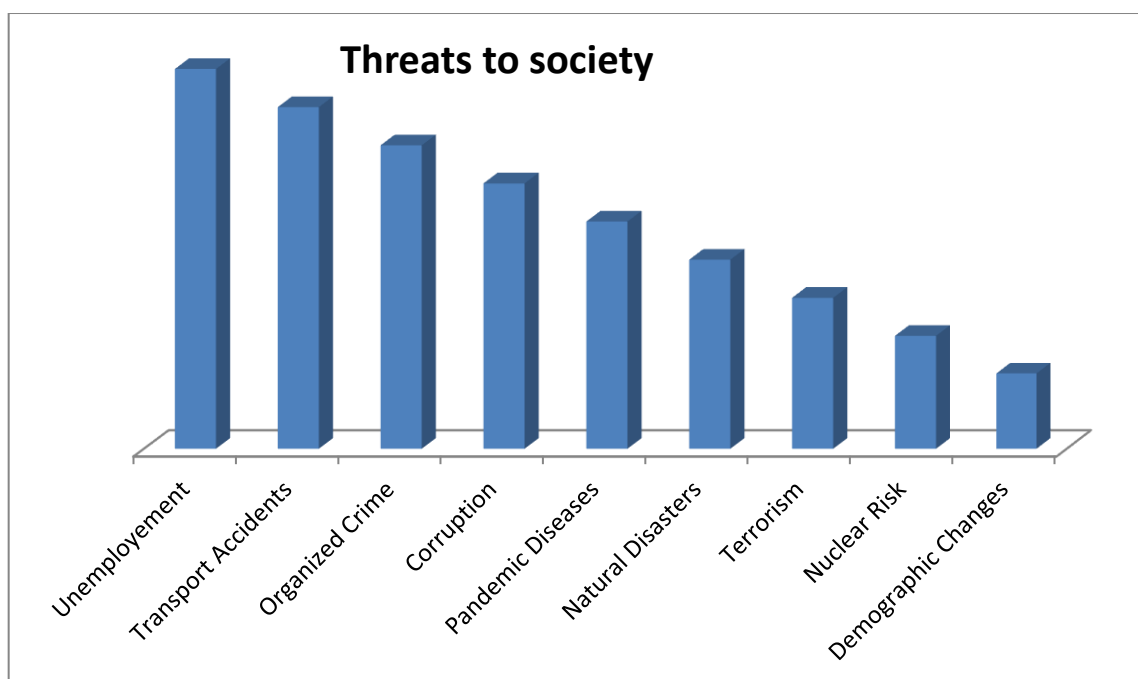
**Graph 2 Participants by geographical origin**



### 3.2. Threats to society

The aim under this heading is to gain knowledge about how the most serious threats to society are perceived. Participants were asked to provide a ranking within a group of threats, either natural or man-made. Transport accidents, including road traffic accidents, are regarded as one of the most serious threats to society, in the current economic situation, second only to unemployment.

**Graph 3 Threats to society**



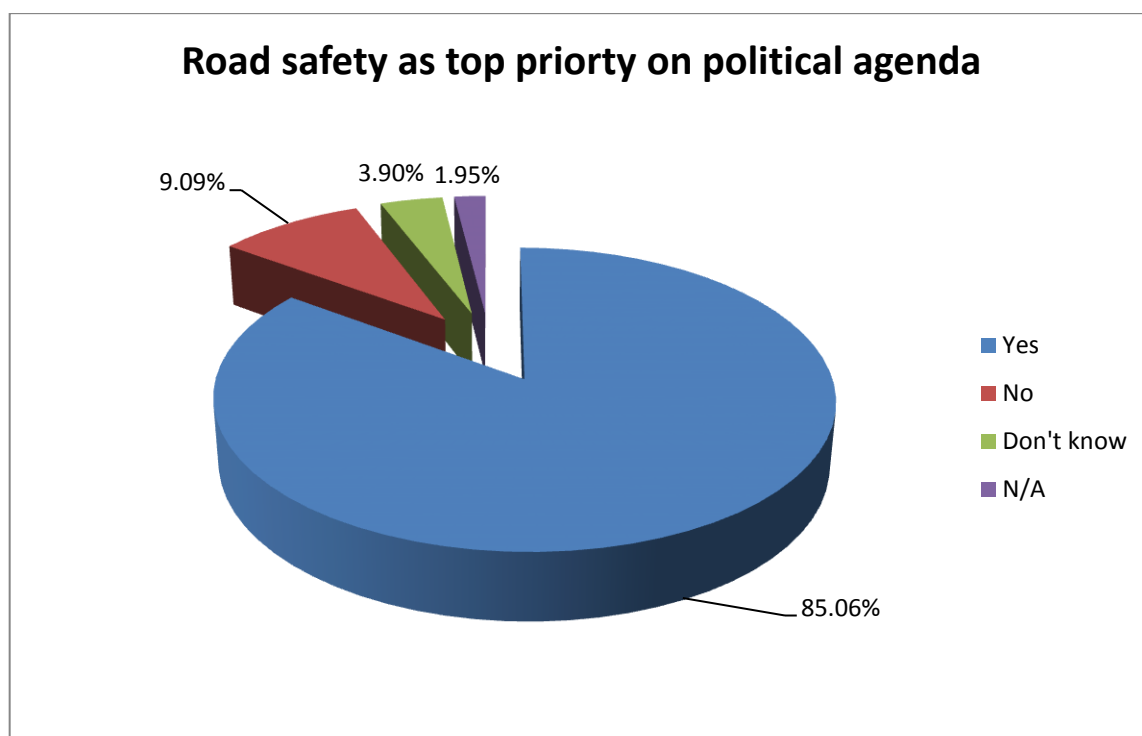
Few respondents remarked critically that the threats cannot be ranked, as they are not inter-comparable, or that the question is not appropriate considering the purpose of the questionnaire.

Some respondents, especially those from public administrations, opted not to answer this question, probably in order to avoid the impression that their answer had some kind of official status among the threats mentioned above.

### 3.3. Road safety as a top priority on the political agenda

The purpose of this question is to ascertain whether respondents consider road safety as one of the most important issues to be tackled at the political level.

**Graph 4 Road safety as one of top priorities on the political agenda**



The above graph clearly shows that road safety should be considered as a top priority on the political agenda. Several reasons were given, based mainly on the social and economic burden on society as a result of road accidents and on the value of human life.

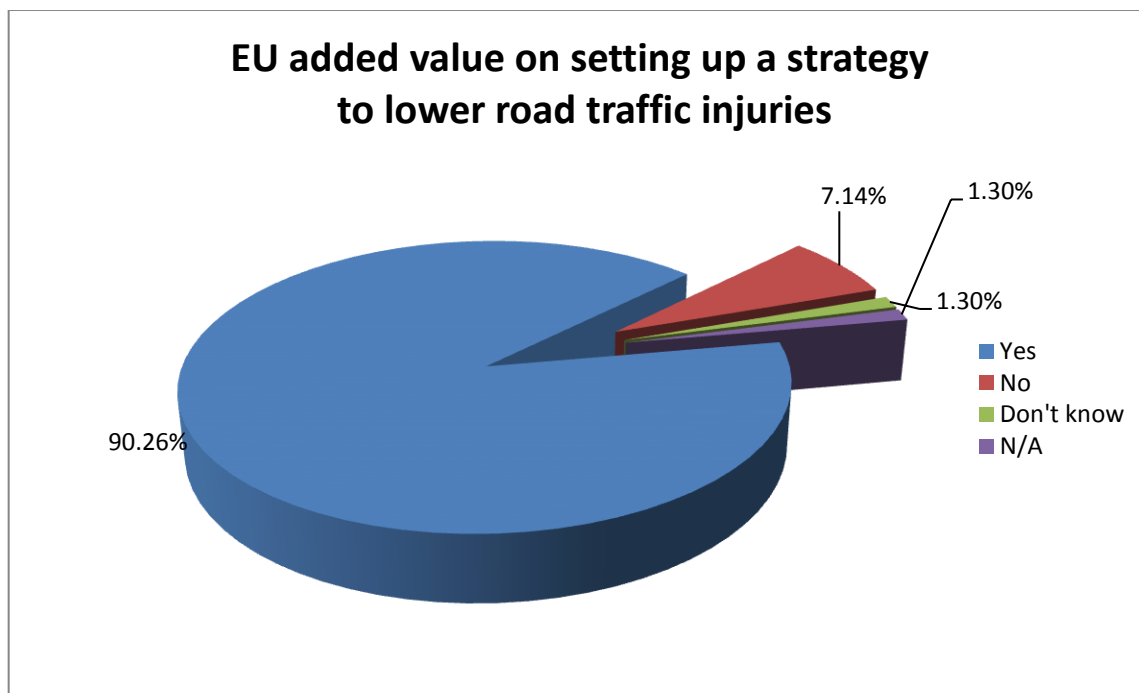
Some respondents called for a higher political commitment at all levels, as a first step towards improving road safety. Building a political commitment around this issue is seen as an increasingly difficult task, with some respondents therefore of the opinion that the EU should take the lead in the political process. A number of contributors highlighted the fact that certain specific groups (such as vulnerable road users) or certain specific actions in the area of road safety (such as enforcement on secondary roads) should receive stronger political support.

A small minority of respondents do not consider road safety as the top priority policy agenda. Nevertheless, some respondents agreed that, although road safety is a priority for transport policy, it is not a general political priority, because other issues such as unemployment are seen as far more important.

#### 4. EU ADDED VALUE IN INTRODUCING A STRATEGY TO REDUCE INJURIES DUE TO ROAD TRAFFIC ACCIDENTS

The purpose of this question is to compile information on how the EU added value of introducing a strategy to reduce serious injuries due to road traffic accidents is perceived, and on the actions that might be taken, building on the positive results achieved by the third Road Safety Action Plan 2003-2010.

**Graph 5 EU added value of setting up a strategy to lower road traffic injuries**



An overwhelming majority of respondents acknowledge the EU added value of introducing a strategy to reduce the number of injuries. Some commentators pointed out that the added value is due to the success achieved in reducing fatalities in the third action plan. This success depends on the role of the EU, which will assume the political leadership of the strategy, by putting positive pressure on Member States to take appropriate measures.

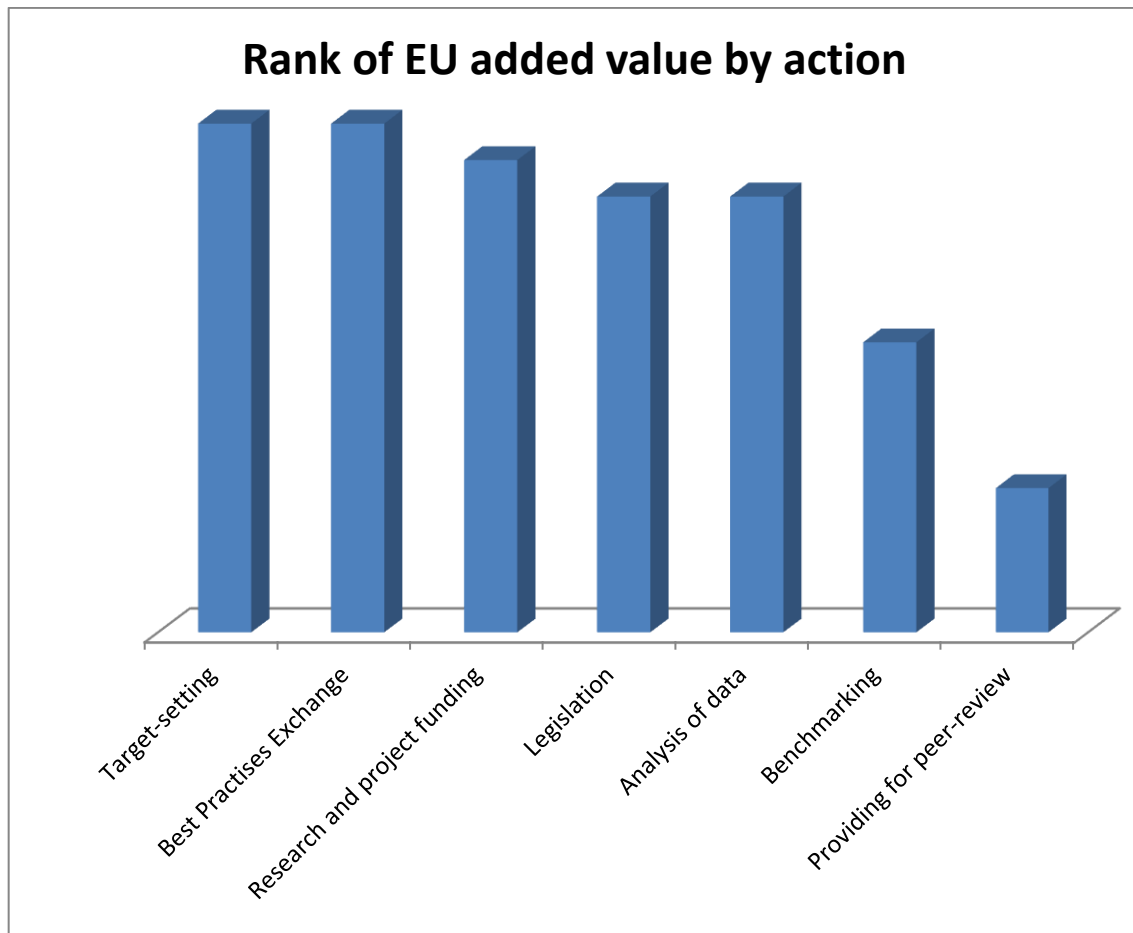
Other comments considered that the EU can make a major contribution to the provision of more reliable data and adequate legislation, to the dissemination of best practices and to the development of further technical standards (road design, vehicle construction). The need for a broader safety policy across all transport modes was also expressed.

Harmonization across the EU is, by its very nature, a controversial issue. Some stakeholders and citizens are calling for greater harmonization in some specific areas, mainly through legislation, while others have expressed the opinion that Member States should be given more freedom because of their widely differing practices and behaviours

Several respondents stressed that any EU action should be based on the principle of shared responsibility, in order not to lose national and local expertise and solutions.

According to the answers given, the following areas are with an almost equally high EU added value: target setting, support for best practices, research and project funding, legislation and data analysis at EU level ranks somewhat lower. Conversely benchmarking and peer review have a relatively low EU added value.

**Graph 6 Rank of EU added value by action**

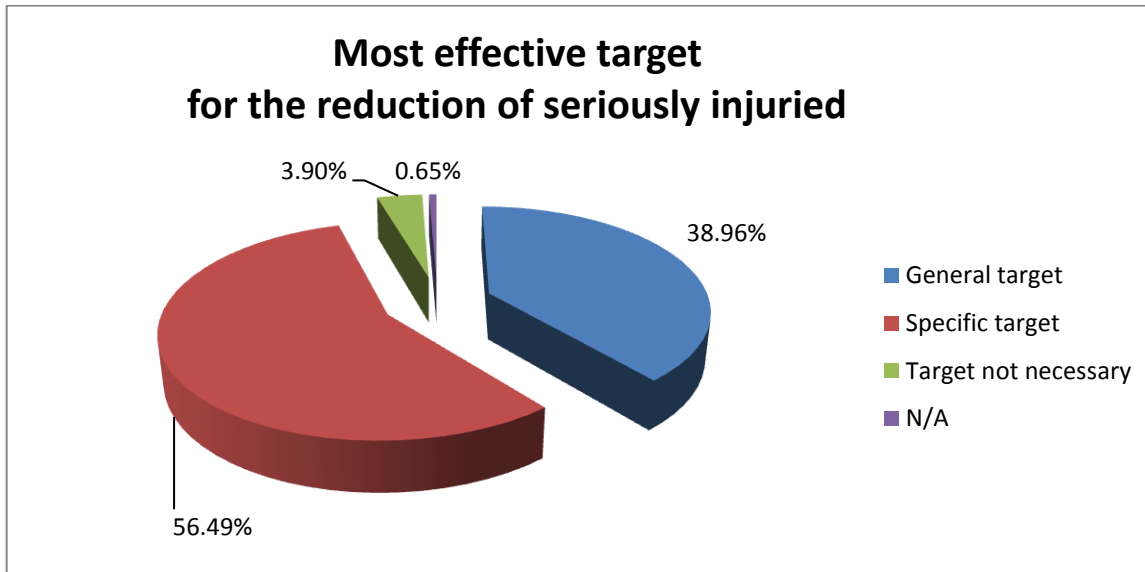


Among other measures with EU added value, respondents suggested that cooperation between public authorities should be enhanced.

## 5. TOWARDS A STRATEGY TO REDUCE INJURIES DUE TO ROAD TRAFFIC ACCIDENTS

A number of questions were asked about setting a target for reducing injuries due to road traffic accidents, what features such a target should include, and at what level it should be set. The main purpose of this section is to investigate whether the positive experience of reducing the number of fatalities under the 3<sup>rd</sup> Road Safety Action Plan could be replicated for the seriously injured.

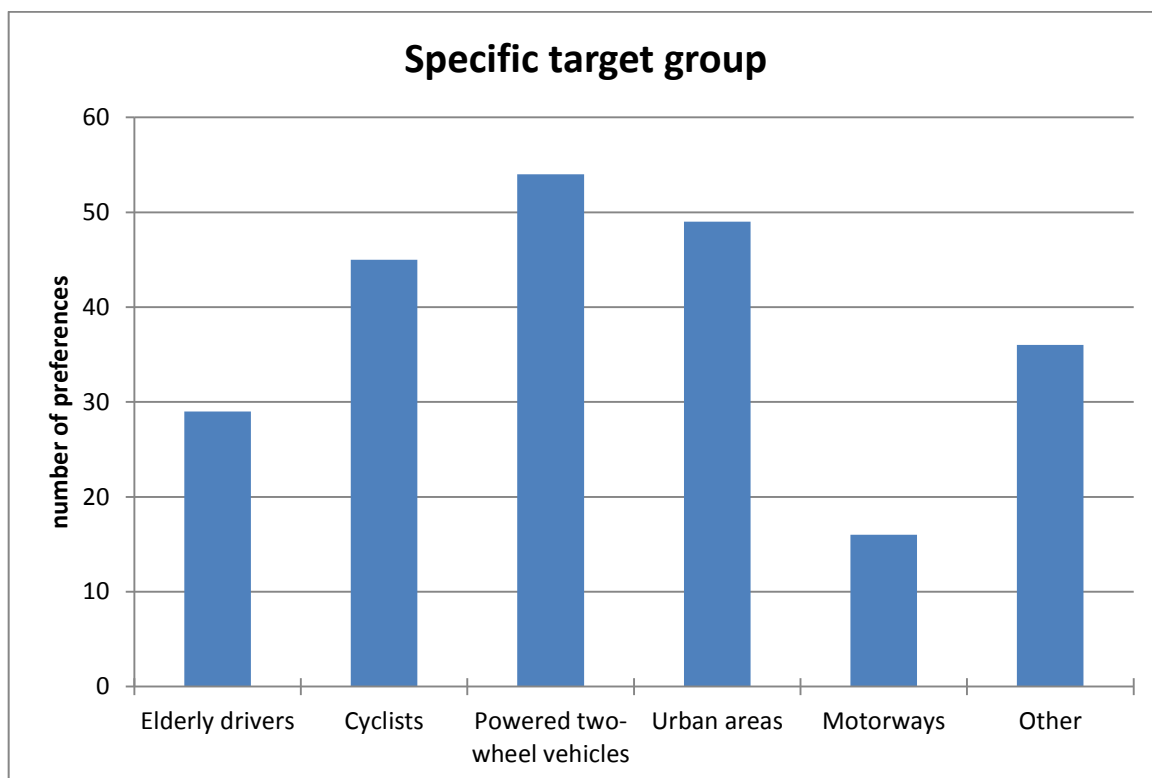
**Graph 7 Most effective target for reducing the number of serious injuries**



The introduction of a target to lower the number of injuries due to road accidents enjoys the clear support of a broad majority of respondents, as this is a precondition for achieving any kind of concrete result. Greater preference was given to specific targets which should be applied to some specific user groups or locations where accidents occur, rather than to an overarching target similar to that adopted for fatalities.



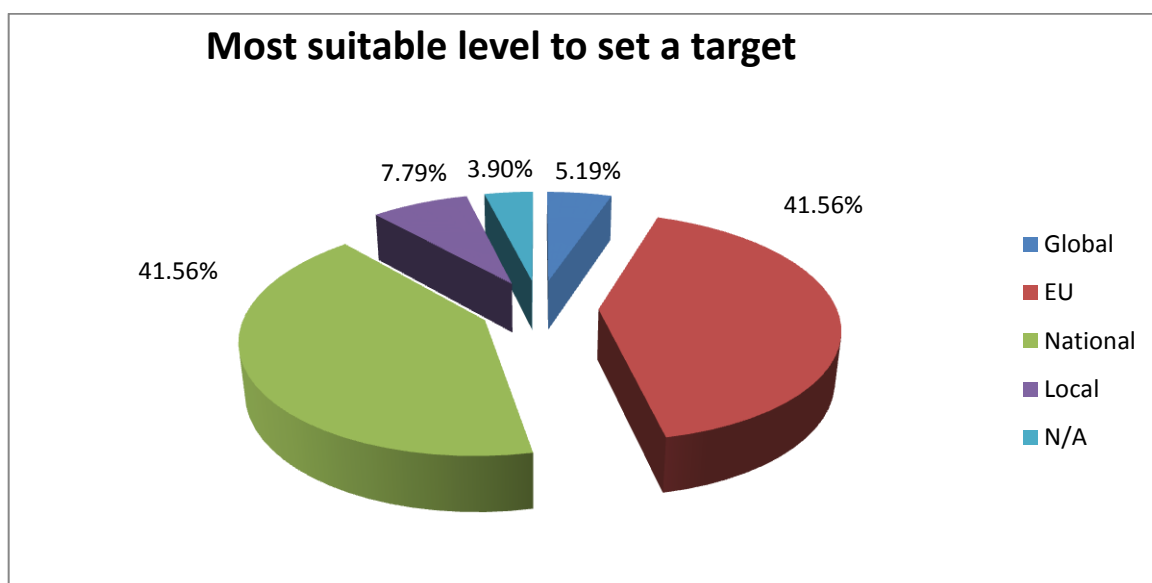
**Graph 8 Specific target groups**



The answers showed that the particular target population should be: those people seriously injured as a result of road traffic accidents on powered two-wheel vehicles, on bicycles, and in urban areas. Among other groups, respondents suggested targeting children and the elderly, as well as younger drivers.

As regards the most suitable level at which the target should be set, the results appear to be mixed between EU-wide a national target, as the graph below shows.

**Graph 9 Most suitable level to set a target**

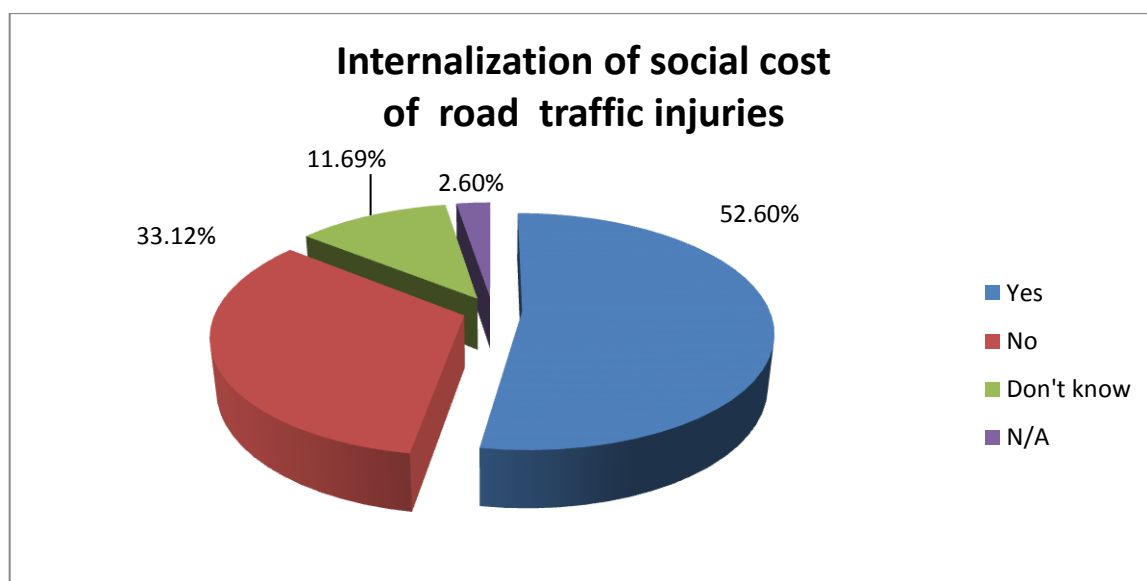


The geographical scope of the target to reduce the number of the seriously injured is clearly polarized at the "intermediate" levels: *i.e.* European and national. The same number of preferences was obtained, whereas global and local targets appear to be less suited than the others. This polarization is partly due to the fact that the question was structured in an electronic format which did not allow multiple choices. Indeed, as some contributors pointed out, a combination of targets set at different levels is likely to be far more effective in reducing road traffic injuries.

### 5.1. Internalization of external costs

The aim of the question was to invite feedback on the policy approach to the internalization of the social costs of road traffic accidents, as one of the possible measures for reducing the burden on society, and giving drivers more responsibility.

**Graph 10 Internalization of social costs of road traffic accidents**



The internalization of the social costs of road traffic accidents, for instance via insurance schemes, is a controversial issue. Despite the fact that most respondents say that they are in favour of such a policy approach, a consistent minority is against this solution, and more than one tenth are unable to express an opinion.

On the one hand, several respondents pointed out that internationalization of external social costs leads to some benefit, because it increases the responsibility on the driver and acts as a deterrent to dangerous behaviour, thereby reducing the burden on taxpayers. Some respondents pointed out that current insurance schemes in several EU Member States are already based on this approach.

On the other hand, criticisms of the proposal can be grouped into four main arguments on social equity grounds (given that it might affect the right of mobility for those on low incomes), the difficulties in clearly establishing liability, the ineffectiveness of such a measure compared to other solutions in terms of preventing accidents, and the current working practices of insurance companies.

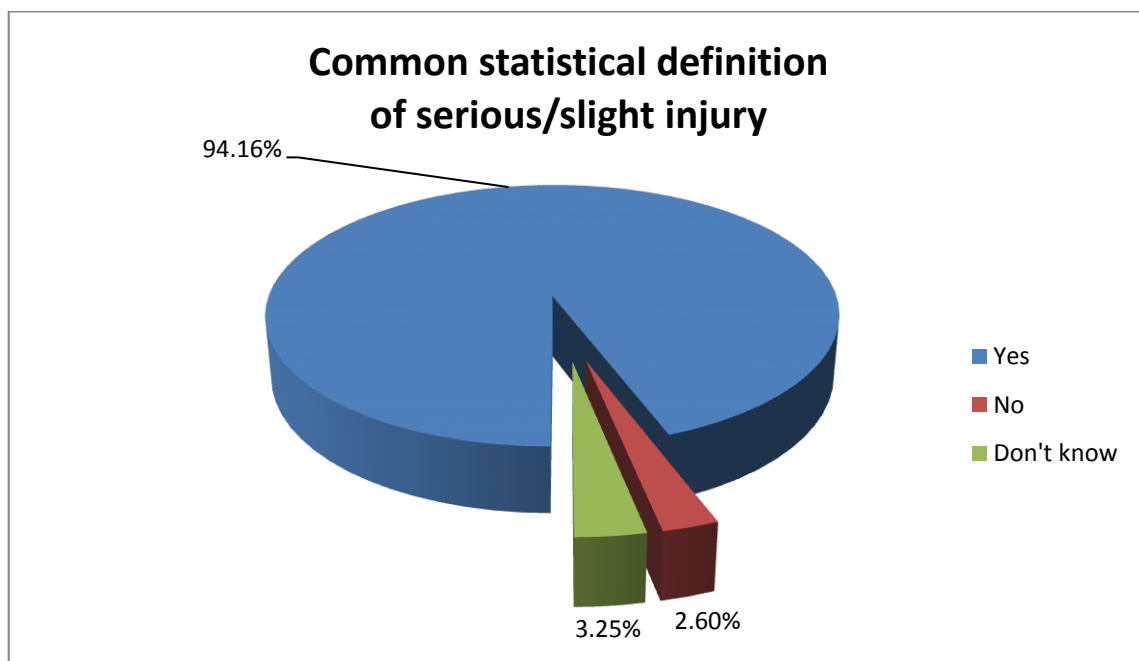
Some respondents pointed out that the internalization of external cost should not prevent public authorities from investing in road safety in any event.

## 6. TOWARDS A COMMON DEFINITION OF SERIOUS/SLIGHT INJURIES IN EU STATISTICS

The purpose of the last set of questions is to ascertain whether there is a need for a common EU definition on serious /slight injury, and on which criteria it should be based, how statistics should be collected and whether the further use of data should be authorized.

The public consultation showed clear support for the common EU definition of serious/slight injury.

**Graph 11 Common statistical definition of serious/slight injury**



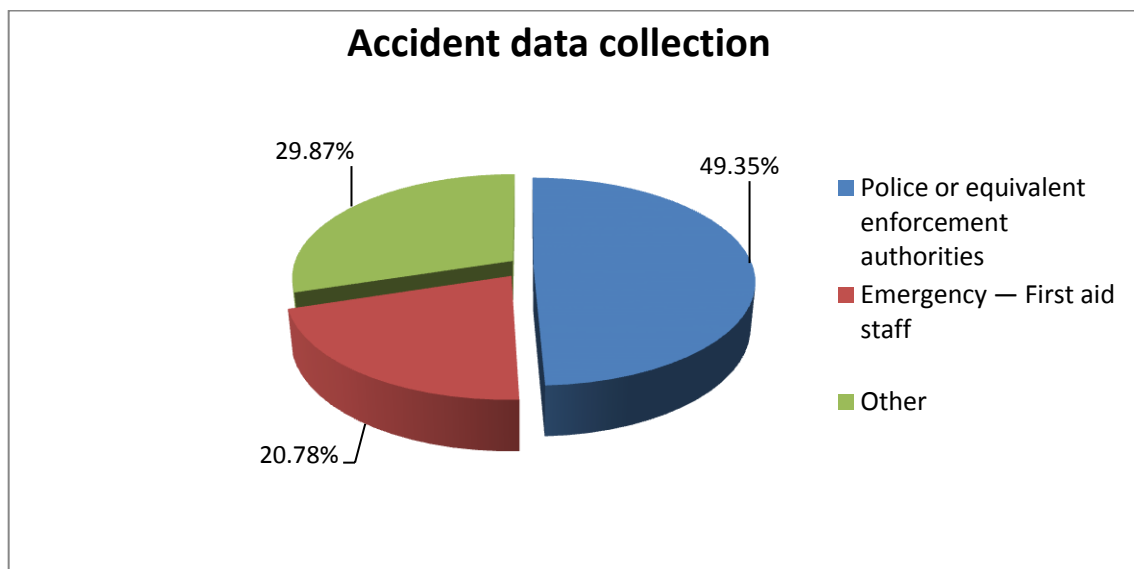
Several respondents (across all groups of stakeholders) stated that a common definition was the first step in taking any measures to reduce the number of injured, and was the basic tool for all decision makers. Some respondents suggested that a more stringent statistical definition should be adopted in order to collect data which enable a particular group to be highlighted (such as motorcyclists), while others pointed out that the difference between Member States lies in the data collection process, and a common EU definition to provide comparable data would be preferable.

Few respondents were against an EU common definition, stressing that more attention should be paid to the practices of exchanging data collections, rather than statistical definitions.

## 6.1. Accident data collection

Currently, the police collect accident data in several Member States, which in respect to injuries leads to misreporting and underreporting, as the police are not always able to evaluate the severity of injury or are not bound to intervene. The European Commission asked whether the current status should be maintained or whether the responsibility for data collection should be changed.

Graph 12 Accident data collection



Half of the respondents suggested that the police (or equivalent enforcement bodies) should be responsible for data collection, as they are the first people who intervene after an accident, even if it was acknowledged that the evaluation of the seriousness of an injury made by police staff might not be correct from a medical point of view. In order to improve the quality of the data, it was proposed that a uniform accident reporting system should be implemented by police staff. A contributor pointed to the need for the report to clearly identify whether the restraint devices had been used correctly in an accident. First aid and emergency staff received fewer preferences.

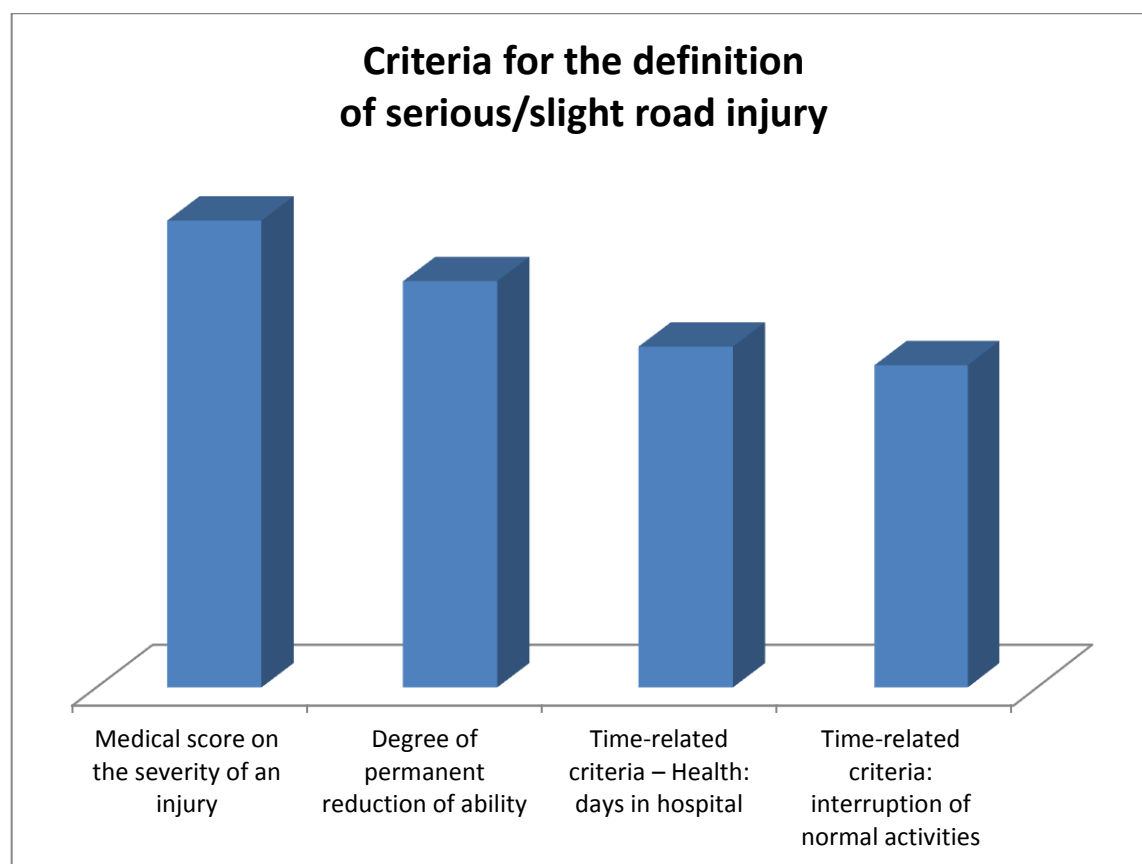
Among the respondents who stated that "other" bodies should be responsible for data collection, several of them pointed out that both the police force and the first aid and hospital staff should be equally responsible for data collection, as this would improve the quality of the data. To this aim, according to some answers police and health/first aid staff should be trained in data collection. Some respondents proposed that a specialized statistical service, in charge of collecting accident data, or an ad hoc accident investigation body could be created (by analogy with other means of transport). Lastly, some respondent took the view that insurance companies were also to be made responsible for collecting accident data.

There was a consensus among the comments that a better, more systematic and more uniform collection of in-depth data was needed across the EU, regardless of which body was responsible for collection.

## 6.2. Criteria for the common statistical definition of road traffic injuries

Two questions concerned the most suitable criteria for the common definition of road traffic injury.

**Graph 13 Most suitable criteria for the definition of serious/slight road injury**



An overwhelming majority of respondents from different stakeholder groups pointed out that the common EU statistical definition for a serious/slight injury should preferably be based on the medical score on the severity of an injury.

Respondents also pointed to the need for a complete and accurate database on injuries in order to further develop technological devices, improve active and passive safety and apply different solutions to vehicles and infrastructure. Some contributors, in particular, pointed out that there was a clear link between the results of accident investigations, injury risk curves and injury assessment reference values on which refers homologations tests. Other respondents emphasized that the ultimate aim of the strategy should be to put in place a policy which will mitigate the consequences of road traffic accidents, and therefore the common statistical definition of serious/slight injury should be shaped accordingly. A number of stakeholders and citizens felt that the most suitable scale for evaluating injury should be the AIS, and not the MAIS. Respondents from the Netherlands and Germany indicated that there is an ongoing discussion on using different versions of the MAIS such as MAIS 2 or MAIS 3 for very seriously injured.

As far as the time related criteria were concerned, several respondents commented that these criteria were not a sound basis for a statistical definition of road traffic injury. The time spent in hospital varies from country to country, given that it depends on other "exogenous factors" which are not linked to the accident, such as the medical practices of

the particular country. Interruption of normal activity (such as school or working days) was criticised for the same reasons.

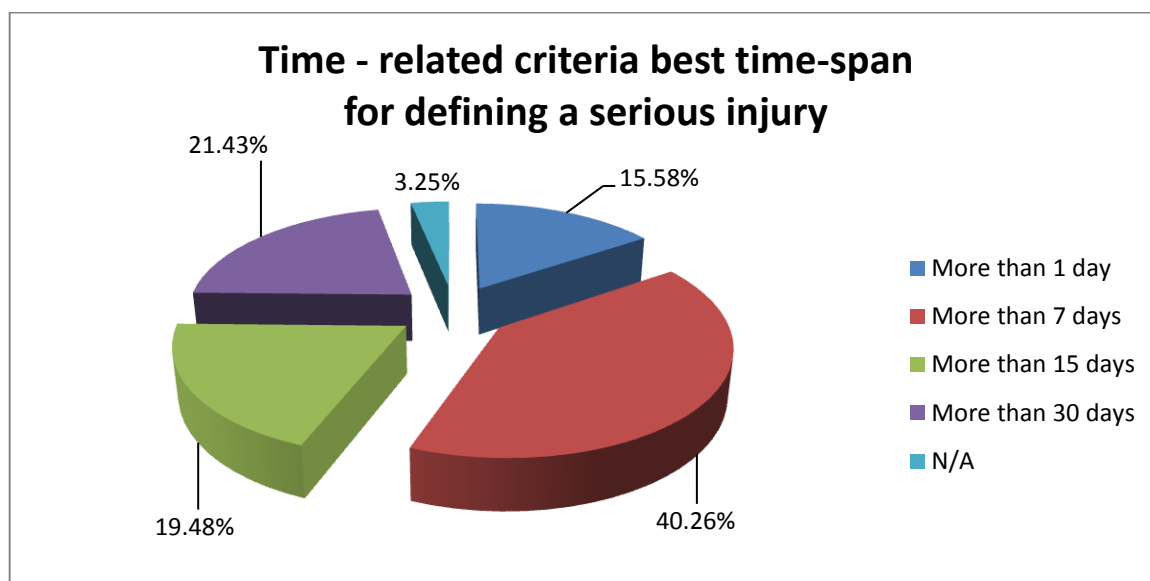
However, some respondents pointed out that other methods, which are not based on a time related criterion, impose a higher administrative burden, while one contributor pointed out that the evaluation based on MAIS is not totally objective, given that the decision on the severity of an illness and might not fully reflect the permanent effect on the person’s ability. It was suggested that a possible solution for some cases would be to combine the MAIS score and the permanent reduction of ability.

Some stakeholders suggested that ad hoc parameters should be identified and put in place to carry out in-depth studies of some specific road users, in order to gain more knowledge about the effect of accidents, such as those involving powered two-wheel vehicles.

### 6.3. Best time span for time related criteria

As it stands, the international definition of “seriously” is based on a time-related criterion – i.e. hospitalization lasting longer than 24 hours – the European Commission asked the respondents what they considered to be the most suitable time span. These criteria can be applied to the Member State with the least administrative changes to start implementing the data collection.

**Graph 14 Time related criteria, best time span for defining a serious injury**

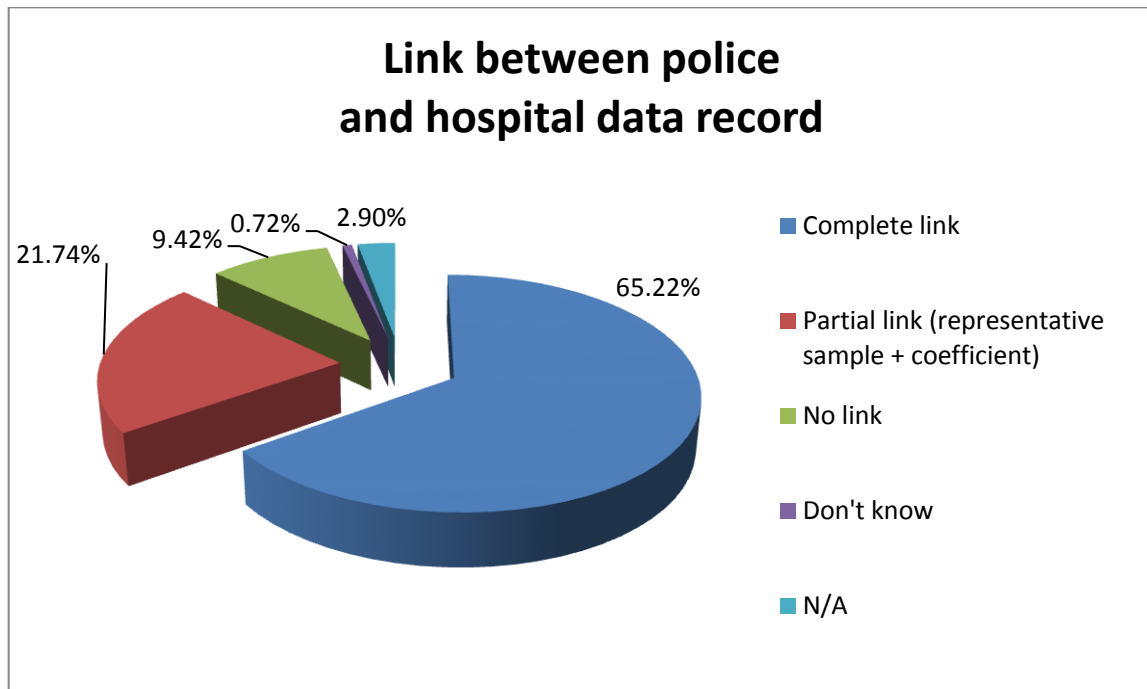


By far the largest number of respondents stated that the most suitable time span for defining a serious injury is more than 7 days of hospitalization, whereas the current system (more than 24 hours of hospitalization) is not sufficient. There was less of a preference for longer hospitalization periods (of between 15 and 30 days).

#### 6.4. Link between police data and hospital data

With a view to improving the quality of current accident data, the European Commission enquired whether a comprehensive link between police and hospital records should be established, even if this solution might entail a higher administrative cost. Other possible options include a partial link between hospital and police reports for a representative sample, multiplied by a coefficient to estimate the amount, or no link at all between the two records.

**Graph 15 Link between police and hospital data**

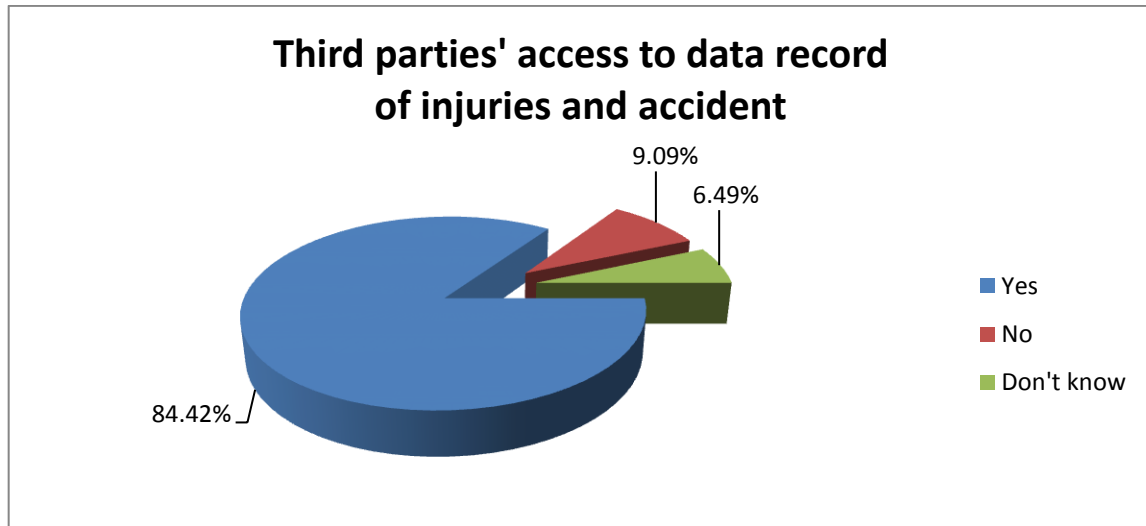


A sizeable majority of respondents felt that data concerning serious injuries should be collected by establishing a comprehensive link between police and hospital records. This is in line with the answers to question Number 9, in which several stakeholders commented that both the police (and other enforcement bodies) and hospital or first aid staff should be responsible for data collection.

## 6.5. Access by third parties to data on injuries and accidents

The final part of the questionnaire is dedicated to access by third parties, namely stakeholders, to the injuries data record in order to gain substantial knowledge and to improve the overall safety of the system.

**Graph 16 Third parties' access to data record of injuries and accident**



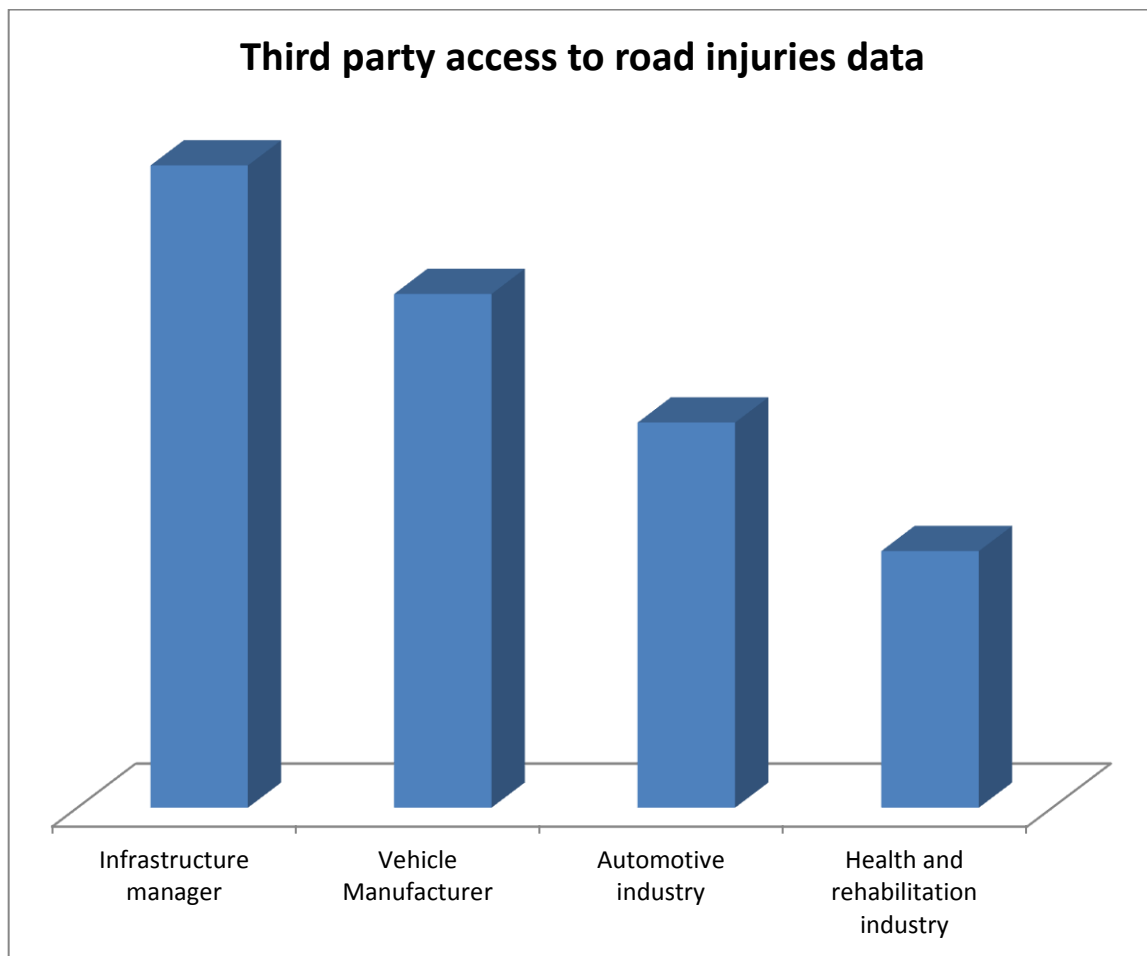
Most of the answers favour giving third parties access to the record of accidents and injuries data. As several contributors have pointed out, access by third parties is necessary in order to improve active and passive safety, and to find solutions to mitigate the consequences of the accidents. In depth data should be comparable, complete and accurate, if it is to be representative and used successfully by the industry.

Roughly one tenth of the answers do not agree with the hypothesis of third party access to the accident and injury data record. The main criticisms are based on the fact that the information is incomplete (data could be misleading) and on the administrative burden of collecting and providing such information.

However, privacy and confidentiality of sensitive information is a common concern for a number of respondents, both in favour of and against third party access to the data record of accidents and injuries. In order to overcome this issue, some stakeholders have proposed authorizing independent third-party organisations to collect data, rather than stockholders with vested interests.



**Graph 17 Access by third parties to the data records of road injuries and accidents, by organization**



The answers clearly reveal a preference for granting infrastructure managers and vehicle manufacturers access to the data records concerning road injuries and accidents. Consistent with the *safe system approach* to road safety, several respondents took the view that other stakeholders – such as public authorities/governments (at any level), insurance companies, associations of road victims and NGOs – should also have access to the data records.