



Transcript of statement provided at:

EP Workshop on Type-approval Requirements for Motor Vehicles as regards their general Safety and the Protection of Vehicle Occupants and Vulnerable Road Users

Dear Mrs Thun

On behalf of Volvo Group I thank you for the opportunity to provide you with the observations of Volvo Group on the “General Safety Regulation” proposal, taking into account the state of the art of safety technologies.

Volvo Group manufactures commercial vehicles so we will only provide comments to proposals relating to trucks and buses.

I would like to begin by saying that it is encouraging to witness the level of attention given to road safety issues on the European level today, as well as on the national level in most EU countries. Volvo Group not only recognizes the need for action we have also been a consistent and long-time advocate for greater focus on road safety in order to curb the negative trend of injuries in traffic.

As you may know, safety is a core value of Volvo, and we have a rigorous approach to vehicle and traffic safety. Key to our approach is the realization that road safety is an immensely complex matter. As a result, it is only through a system-wide approach, evidence-based prioritization of actions, and the shared effort of all stakeholders of the traffic system that progress can be made.

We are encouraged to see that EU today has set out a clear vision, ambitious targets for reducing fatalities as well as serious injuries, and adopted an evidence and system based approach towards road safety.

We applaud these efforts and we endorse much of what is proposed in the GSR. But you have invited me here today because you want the proposal to be challenged – so that the final result is as good as it can possibly be.

And to that end I would like to express concerns with some aspects of this proposal, some of which could seriously jeopardize progress in vehicle safety, or at the very least derail us from more beneficial paths.

In short, there are three areas of concern.

Firstly, looking at the list of proposed technical systems there is a tendency towards over-reliance on individual gadgets to solve complex problems, which disregards a more holistic understanding of these problems and of the true variability of use cases that exist. There is a rarely a single simple device that satisfactorily addresses a road safety concern.

Secondly, there are cases of considerable over-estimations of the potential benefits of certain technologies, perhaps as a result of misconceptions about their actual (present) capabilities.



The real issue here is that if we are serious about making progress (on road safety) we must be very careful about not shifting attention and resources away from the truly important steps. There are no low-hanging fruits anymore – everything comes as a result of a tremendous effort. And we must remember that if we overload the action plans or aim in the wrong direction, we are at risk of distracting regulators and technology developers for years on implementing technologies which are either unviable or unlikely to benefit road safety.

The concept of an advanced driver distraction system is a case of the former, and TPMS for trucks is an example of the latter.

The third concern pertains to implementation aspects of the proposal. Please be aware that we cannot design, develop, put in production and type approve anything in 12 months, as proposed by the Commission. Nor is it realistic to expect us to develop these technologies on chance – by which I mean, it is not possible to begin development before technical requirements are finalized.

Similarly, requirements on direct vision – an important area which rightfully should be addressed – significantly impact the structure of the vehicle and also major tools in the production system – this is a huge undertaking with significant lead times. This means they must – by default – be applicable to new cab types only. Such modifications cannot be made on the present fleet of vehicles. However, also within the present fleet of vehicles significant efforts can be made to improve visibility related concerns, as demonstrated by the vision standards developed by TfL (where Volvo Group has been a key partner).

This is also a major reason why we promote driver assistance systems to address vulnerable road user accidents, in combination with efforts to promote the appropriate truck (e.g. lower chassis) for the demanding urban environments. They deliver real benefits on a much shorter time frame, and complements the longer term prospect of new cab designs.

Now, there are ways to speed up implementation further. Namely, by working together to selectively prioritize the most important steps and help finalize the technical provisions of these without delay.

I don't think there is a need to go through each item of the GSR. As I said, we support the majority of what is proposed. Instead, I would ask you to please give serious consideration to the detailed comments provided by ACEA – which was based on both independent analyses as well as the result of decades of expertise in development of technology for automotive applications.

In conclusion, Volvo Group would like to express its general support for the GSR proposal, and even more so to the great efforts of European policy makers in addressing road safety in Europe. We have, however, identified some critical items which we cannot endorse at this time, particularly pertaining to selected technical systems, and more generally, about the time-frame for implementation and the non-applicability of major direct vision modifications on existing cabs.

Sincerely,

Peter Kronberg

Safety Director, Volvo Group

Brussels, Nov 29, 2018