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| **ECF Road Safety Recommendations for European Parliament Own Initiative Report** |
| European Cyclists’ Federation |
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Key Recommendations

Main principles

* EU citizens should have the right to active mobility. The public space is space for all, we need a better balance between modes of transport, including more space for Active Mobility like cycling and walking. There should be a right to cycle and walk for all people, and there should be a right for Active Mobility in public space. This human perspective should be a main principle of all transport planning and investments.
* Every EU citizen should have access to a safe cycle route network (safe route to school, work, culture); we can choose to not cycle, but we should not be prevented from cycling by unsafe roads.

Vehicles

* Intelligent Speed Assistance systems in EU vehicles should be a major policy tool of the EU to control speeding both in the short and long term.
* Make sure the Commission secondary legislation on ISA is as effective as possible.
* Parliament, as reviewing body, and Council Member States as contracting parties of UNECE to make sure blind spots are reduced “to the greatest possible extent” in UNECE regulations on truck Direct Vision.
* Ensure that a review of the General Safety Regulations is underway in 2025 (as foreseen in the regulation) and reflects the current advancement of safety technologies and measures.
* Make sure that EPACs and Cargo Bikes are not overregulated with regards to review changes to the 2- and 3-wheel vehicle Type Approval.

Infrastructure

* Complete quality requirements for cycling infrastructure (on primary road network) in the frame of Road Infrastructure Safety Management RISM2 directive (2021-2023). Complemented by similar document for urban roads, so together we have comprehensive EU-level quality requirements for cycling infrastructure.
* Integrate cycling in the Road Infrastructure Safety Management RISM network-wide road safety assessment.
* Integrate cycling and EuroVelo in the revision of the TEN-T guidelines.
* Funding for local and regional cycle networks, especially in the less developed regions of the EU.

People, behaviour, and Society

* The lowering of the age limit should not be allowed for any vehicles including smaller M1 cars.
* A graduated driving licence that requires young or novice drivers to have more experience before being allowed to operate more powerful vehicles and Advanced Driving Systems should also be part of the testing and training procedures.
* Encourage and recommend EU Member States to adopt as default maximum 30km/h in cities where people walk, cycle, work, and play and to improve speed limit signs to be working with vehicle speed assistance systems.
* Speed management should be at the centre of national road plans and strategies.
* The EU should not recommend the mandatory use of bicycle helmets. Helmet use should be a choice for the cyclist.

Other issues

* Improve data collection on cyclist numbers to assess risk. Single bicycle crash and other data are also important to understand.
* Propose an EU wide zero (or at least 0.2% BAC) alcohol tolerance for all drivers.

Status of Cycling Road Safety across the EU

In 2010 there were 2077 cyclist fatalities, and in 2018 there were 2,160 cyclist fatalities on European roads, this represents a negative progress in the safety of cyclists over the decade[[1]](#footnote-1). Of course cycling has increased since the start of the decade, however we do not know since nearly all Member States do not keep data on the number of cyclists. So unfortunately, due to the lack of data or information from the EU member states or from the European Union, we simply do not how much progress we have made in reducing risk for cyclists across the EU.

All the other modes have seen reductions in deaths on the roads, except for cyclists. The Eu and its member states need to understand this, whether it is due to more numbers of people cycling or the roads becoming more risky, and act appropriately.



Source; ETSC (2020), PIN Flash 38, How Safe is Walking and Cycling in Europe

Member States should be admonished for the terrible collection of data and recording of their cycling citizens deaths on the roads. We do not have clear knowledge concerning single bicycle crashes, we do not have a clear idea of serious injuries, nor do we have a clear idea of how much cycling has increased. We do not know how many or how often people are cycling and therefore we have no idea of the risk of cycling in each country. For example, we know how many cyclists are killed at night in the various EU countries but as we have no idea how many are cycling at night, we have no idea if this is a risky problem area for cyclists.

The paucity of data makes it very hard to make important policy decision and strategies to improve cycling safety. We know that HGVs and large vehicles are dangerous for cyclists, but is this a problem in urban areas or on long distance straight rural routes? What type of large vehicles are involved, articulated trucks or smaller rigid lorries? Construction trucks? The complete lack of data that member states collect is making it difficult to come up with clear transport safety policy.

Cycling Road Safety and Public Health

Given the large health benefits of cycling (health related life-years gained outweigh injury-related life years lost by significant amounts[[2]](#footnote-2)) a cycling safety plan should look at *promoting* cycling and walking by reducing the perception of risk. Increased cycling is a solution to many issues within our cities as well as promoting improved health. Shifting to cycling improves air quality, eases congestion, promotes liveable cities, and creates sustainable, democratic access to city amenities and services. Active commuting by bicycle is associated with a substantial decrease in the risk of death from all causes, including cancer and cardiovascular disease, compared with non-active commuting. Active transport use can boost self-esteem, mood, sleep quality and energy, as well as reducing the risk of stress, depression, dementia, and Alzheimer’s disease. ECF conservatively estimates the current economic benefits of cycling at around 150 billion euros[[3]](#footnote-3). The high levels of cycling in the Netherlands contributes to around 3-5% of Dutch GDP[[4]](#footnote-4). In comparison, a recent study by the European Commission estimated the negative externalities, i.e., the costs for the environment, health, and mobility, of motorised road transport at 800 billion euros per year[[5]](#footnote-5). The potential economic benefits of a shift to cycling is staggering.

This potential is increased when we consider that around 50% of motorised vehicle journeys are under 5km and 30% under 3 km[[6]](#footnote-6). This shows the huge potential of shifting from motorised transport to active modes of transport like cycling. However, a huge barrier to increasing cycling is the perception of safety risks[[7]](#footnote-7), so it is important that cycling, as well as being safe, also looks safe and is comfortable. The perception of risk and safety therefore is an important element of cycling road safety and advocacy. Promoting cycling can improve public health and road safety; while improved road safety promotes cycle use and can increase cycling. Good cycling road safety interventions also therefore promote the use of cycling by reducing the perception of risk, whilst the increase in cycling in turn improves safety and public health.

Crucially it is important to observe that cycling is not overly dangerous; cycling is as risky as walking per distance travelled[[8]](#footnote-8). Road safety interventions should not decrease the number of cyclists or act as a barrier to potential cyclists, as this intervention would almost always bring about a reduction in overall public health no matter how effective the specific road safety measure is. Rather road safety interventions should be seen as an opportunity to improve public health outcomes generally, through increasing the use of cycling as a sustainable, healthy transport mode.

Specific Road Safety Measures

Infrastructure

Cycling can be a major contributor to shifting mobility from polluting and passive modes of transport to cleaner, emissions free, active modes of transport. However, road safety is the number barrier to increasing cycling and getting more people to use their bikes, the design of safer more comfortable road infrastructures for cyclists now must be a top priority. ECF would recommend two first principles when considering cycling infrastructure provisions,

1. EU citizens should have the right to active mobility. The public space is space for all, we need a better balance between modes of transport, including more space for Active Mobility. There should be a right to cycle and walk for all people, and there should be a right for Active Mobility in public space. This human perspective should be a main principle of all transport planning and investments.
2. Every EU citizen should have access to a safe cycle route network (safe route to school, work, culture); we can choose to not cycle, but we should not be prevented from cycling by unsafe roads.

*Recommendations*

Short term:

* Complete quality requirements for cycling infrastructure (on primary road network) in the frame of Road Infrastructure Safety Management RISM2 directive (2021-2023). This should be complemented by similar document for urban roads, so together we have comprehensive EU-level quality requirements for cycling infrastructure.
* Integrate cycling in the network-wide road safety assessment (also RISM2, deadline 2025). This should address:
	+ The fact that motorways are usually assessed only along main carriageways.
	+ accidents in interchange areas (where the cyclists appear on a lower-class road) stay “under the radar”.
* Integrate cycling and EuroVelo in the revision of the TEN-T guidelines (2023).
* Set up EU-level standards on data about cycling infrastructures, start collecting and monitoring data, e.g., total length of cycle infrastructure by type (cycle tracks, cycle lanes, other), % of road network safe (in-line with quality requirements) for cyclists, % of population with access to cycle network. As for now, most of Member States do not have this information, and those who have some do not provide it in a consistent manner.
* Introduction of cycle audit. Planned investments should be systematically reviewed to identify opportunities for improving conditions for cycling.

Longer term:

* Systematic removal of barriers for active mobility created by the TEN-T networks (rectifying mistakes from badly designed projects in the past).
* Harmonisation of national regulations of cycle infrastructure (for example, common rules for cycle streets, signage of cycle lanes or contraflow cycling) – useful for international mobility.
* Implementation of the European Cycle Route Network.
* Funding for local and regional cycle networks, especially in the less developed regions of the EU.
* “Bicycling is the European way” –make EU know-how of cycle infrastructure an EU export product.

Vehicle regulation –

In the EU, 83% of cyclist deaths follow a collision with a motor vehicle (99% for pedestrians)[[9]](#footnote-9).

This underlines the importance of designing and regulating safer vehicles, not only for those inside the vehicle but for those outside the vehicle. Interesting developments have been underway in vehicle technology and the mandatory regulations that mandates vehicle manufacturers to put these improvements in their vehicles. The EU has a clear mandate here within the remit of the single market and must show global leadership through its type approval safety procedures and work on autonomous vehicles and ADAS systems.

General Safety Regulations

The primary legislation of the General Safety Regulations which mandates vehicle safety measures was finalised[[10]](#footnote-10) and approved[[11]](#footnote-11) at the end of 2019 and work got underway in the technical specifications for the secondary legislation, mainly at UNECE but also through the Commission. Two issues stand out here; measures to reduce excessive speed to avoid and mitigate the effects of a crash, and then also a measure to reduce the impact of HGV/truck crashes.

There was one disappointing factor and that was the implementing legislation on the Intelligent Speed Assistance. The text required that ISA should be a Speed Control Function (SCF) or another type of technology that is just as effective. Unfortunately, the Commission decided that a cascading auditory alarm system would suffice; ECF thought that this was inadequate[[12]](#footnote-12). It is possible within the remit of the regulation to review the measures (in 2025) and to update the regulation. We would recommend a review of this as soon as possible to understand the efficacy of Cascading Auditory Warnings (CAW), and to propose a better more effective system.

Secondly, as required by the 2019 primary legislation trucks must reduce “…to the greatest possible extent the blind spots in front of and to the side of the driver”[[13]](#footnote-13). This is being shrunk to its minimum by industry interests, the Parliament in its reviewing role and the Council Member States in their UNECE membership status, must stand form in improving the Direct Vision to the ‘greatest possible extent

*Recommendations* to the EU

Short term

* to require the fitment of a fully functioning Intelligent Speed Assistance system, which interacts with the driver through the pedal or Speed Control Function, rather than also allowing an Auditory Warning System.
* In the medium term the secondary legislation should be reviewed in 2025 and improved to take into account developments in the ISA technology to make sure that the best systems available are mandated for vehicles.

Long term,

* Eventually a non-overridable, always on ISA system should be mandated in all motor vehicles; there is no need to be speeding on the roads.
* Top speed limiters should be made mandatory on vans as they currently are on trucks and buses.
* Parliament, as reviewing body, and Council Member States as contracting parties of UNECE to make sure blind spots are reduced “to the greatest possible extent” in UNECE regulations on truck Direct Vision.
* Encourage Member State and local authorities to keep larger vehicles out of the city as much as possible. We should be looking to separate cyclists/pedestrians from large heavy goods vehicles, particularly construction vehicles unless it is absolutely not possible, larger vehicles should only make necessary journeys, or having specific routes that are away from routes that are used by lots of cyclists. Cargo bikes could be a good substitute for many freight trips in urban areas.

Advanced, Autonomous and Connected vehicles and systems

Currently autonomous vehicles do not yest exist, or at least certainly not as many that would have an impact on the vehicle fleet. However, it is an end point of many various interests within the transport field, and so it is important that it is confronted and that we can begin to understand what that impact may be and deal adequately with any possible regulatory needs. If we carry on with the private motor car ownership model, it will be even more difficult to move people onto sustainable modes, and ECF has many reservations about their use beyond road safety, such as; zero occupancy driving and increased congestion; kerb side politics of rob—taxis and driverless freight; modal shift away from public transport and active modes of transport; the impact on the value of travel time and the unintended consequences of more sprawling cities; to name a few.

With regards to road safety there are concerns around the behaviour of these vehicles with other modes of transport; risk assumptions by those around the vehicle; reduced investment in already sustainable modes; how should regulatory authorities deal with regulating for these vehicles. Finally, there are of course the ethical “trolley bus” questions of how a vehicle should react when deciding between protecting its occupant or those outside the vehicle in the event of a critical situation.

There is also a more current problem and that is the safety concerns around Level1-4 of autonomy, the Advanced Driver Assistance Systems. Many of these can indeed bring a greater level of safety for those outside the vehicle, however they will certainly not be a magic bullet that will bring us ‘Vision Zero’. In fact, there is the possibility that they could even hinder the achievement of this target. Distraction within the can be a problem, but even more serious can be an over reliance of ADAS systems and bringing the driver back to the driving task in a problematic driving task.

*Recommendations*

* The EU should recommend that autonomous vehicles are only allowed in cities if they are shared or public transport.
* Bring autonomous vehicles into the European Type Approval system so that they can function perfectly well on European roads, complying to all the necessary road rules and regulations.
* Advanced Driver Systems (ADS) should be clearly regulated and understood for manufacturers, users, and public authorities.
* To make sure that the driver is not forgotten when regulating for AVs, and this is particularly important in semi-autonomous vehicles and all levels of autonomy up to and including stage 4. Distraction and handing back the driving task to the driver are essential components of providing safety regulations for AVs. This should also be linked to updates to the Driving licence Directive to make sure that drivers also understand their role and that of the vehicle.
* In the same way that roads should be self-explanatory, autonomous and semi-autonomous vehicles should also be self-explanatory with regards to the tasks to be performed by driving. For the driver to know when and where he/she understands his/her role, it is important that those roles are clear-cut and obvious.
* There is more to safety than safety! Even if a vehicle could driver at a faster speed and be safe within the defined parameters of the vehicles use, speed limits should always be respected. Likewise, autonomous vehicle “behaviours” should be regulated, a vehicle can conform to the law while also being very aggressive and a menace to cyclists and pedestrians.
* The EU should be working on the ethical issues of crash avoidance.
* A general framework of when and how to use Avs should be developed, this should include only allowing Avs into urban areas if they are shared, ‘taxi’ or public transport vehicles.

Electrically Power Assisted Cycles (EPACs) regulation

EPACs (Electrically Power Assisted Cycles) are electrically assisted bicycles that give a modest boost to assist riders up hills or winds. An EPAC’s electric motor assists the cyclist but will only work with pedalling, no pedal, no power. ECF sees these bikes as a vital addition to the cycling fleet of vehicles. It is an active mode of transport that contribute to health and the environmental goals of the EU, the power assist is designed to complement not replace the main propulsion, which is generated by human muscle power through manual pedalling. The maximum speed is 25 km/h before the motor cuts out, and a top maximum continuous rated power of 250 watts.

An estimated 5.1 million e-bikes were sold in the EU-27 in 2020, bringing total stock to about 20 million e-bikes in the EU.[[14]](#footnote-14) The European bicycle industry forecasts strong growing demand for e-bikes over the next decade and will reach annual sales of 17 million units in 2030.[[15]](#footnote-15) E-bikes also represent a growing share of annual bicycle sales. About 25 % of all bicycles sold in the EU in 2020 were e-bikes; in the Netherlands and in Belgium, the share is already as high as 50 %.[[16]](#footnote-16) In Germany, the largest market for bicycles in the EU, the e-bike share in 2020 was 38.7 %.[[17]](#footnote-17)

EPACs have a huge potential for substituting short, and middle distance, motor vehicle journeys[[18]](#footnote-18). It has been shown around the EU that around half of all car journeys are under 5 - 7 km[[19]](#footnote-19). These journeys are traditionally at the outer limit of bicycle/car substitution; however, it is very easily within range of electric assisted bicycles. ECF estimate that there is a potential of generating about 103 billion extra km cycled on EPACs by 2030 through an increase in EPAC sales which would represent a 77% growth over current figures (134 billion km). CONEBI (the Confederation of the European Bicycle Industry) think that around 12 million units will be sold in 2030 in the EU, we anticipate an EU EPAC stock of around 62 million bikes by 2030. Germany, The Netherlands, France and Belgium are leading the way in EPAC sales, with Germany the highest at 1 360 000 EPAC sales[[20]](#footnote-20). These are part of the future of cycling in the EU.

EPACs technical regulations come through the bicycle working group TC333 in the standardisation bodies CEN, not through type approval[[21]](#footnote-21). This means that they are also covered by the EU Machinery Directive for its electronic components. All Member States[[22]](#footnote-22) treat EPACs as bicycles with regards to use on the roads, they can use cycle infrastructure, they do not require mandatory helmet use (unless the bicycle requires it), they do not require license, compulsory insurance, or number plate.

EPACs safety characteristics are very similar to that of a bicycle[[23]](#footnote-23), with similar risks, except with an increased risk to elderly riders, often through mounting and dismounting issues. With regards to EPACs third party crash data (EPACS crashing with other road users), there is data from Germany on the impacts of EPAC and motor vehicle crashes on pedestrian injuries and fatalities. The table below[[24]](#footnote-24) shows the EPAC and motor vehicle crash fatality figures with pedestrians in Germany for 2016. It also gives an approximation of exposure by estimating the number of vehicles in use since km/time travelled is not available[[25]](#footnote-25). In conclusion, EPACs are not a dangerous mode of transport, rather, just like bicycles they can be a road safety tool by shifting people from 1,5 ton, 200 horsepower vehicles to cycling or eBiking.

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| Accidents involving two parties in Germany in 2016, of which: |
| **Principal party** | **Other party** | **Pedestrian Killed** | **Pedestrian Seriously Injured** | **Estimated vehicle population** | **Pedestrian risk per vehicle** |
| EPAC | Pedestrian | 0 | 11 | 3.000.000 | 1/272.727 |
| Motor car | Pedestrian | 483 | 7.163 | 44.000.000 | 1/5.754 |

*Recommendations*

* To make sure that EPACs ≤ 250 watts and ≤ 25 kph EPACs are excluded from upcoming European Type Approval changes (including smaller cargo bicycles), and that they remain in the orbit of CEN TC333.
* To improve the testing and regulatory environment for Speed Pedelecs and larger power assisted cargo bikes, so that they are not overly impeded by burdensome regulation that is not relevant for their safety.
* Encourage education of retailers and users that EPACs with step through frames may be safer for use with elderly riders.
* The trend of EPAC manufacture is towards mid drive motors and away from wheel drive. This leads to a lower centre of gravity and less wheel skidding when accelerating. Batteries and motors are also becoming lighter. We would encourage the continuation of this trend.
* Not to increase the allowance of higher power limits/speeds for exclusion from type approval.
* The EU should provide funding to subsidise the purchase or EPACs[[26]](#footnote-26).

People, Behaviour and Society

Driving Licence

As with the current licence Directive, Electric Power Assisted Cycles (EPACs) should be explicitly excluded from the Driving License Directive. They are treated as bicycles within national regulations and also in European Type Approval, the Motor Insurance Directive and in the current driving licence Directive.

We support the Commission in opposing the attempted reduction in age limits for some smaller M1 cars last year, and we strongly support our Finnish members Pyöräliitto ry in opposing any reduction in the age limit for any M and N category vehicles. The driving licence directive should not allow any reduction in ages nor derogation at the national level. In the United States, the risk of crashes among car drivers between the ages of 16 and 17 is about twice as high as that of 18- to 19-year-olds. In Finland 17-year-olds accounted for about 8 percent of all road infractions, although only about 0.3 percent of driving license holders. Allowing younger drivers of fully sized vehicles is the wrong direction that we should be taking for safer roads across the EU. In fact, we would support a graduated scheme similar to the L category type of vehicles. Novice drivers should not be allowed to drive more powerful, larger vehicles nor taking part in more risky driving such as at night or with other passengers until having completed a further validation and testing requirement. Driving training should be a lifelong learning, vehicles, road rules, and traffic makeup change over time as do the drivers themselves. Re-assessment should be a part of this lifelong learning and training should be incorporated after the initial training and testing to retain the licence.

*Recommendations*

* The lowering of the age limit should not be allowed for any vehicles including smaller M1 cars.
* A graduated driving licence that requires young or novice drivers to have more experience before being allowed to operate more powerful vehicles.
* Align driving education, training, and testing across European countries. A review of the Driving Licence Directive could strengthen formal driver training with a set of harmonised standards. That could also include interaction with cyclists and pedestrians.
* Advanced Driving Systems should also be part of the testing and training procedures. The risks associated with semi-autonomous driving will also have to be built in eventually to the driving licence attainment. However, Drivers should be trained to be able to drive cars without advanced driving systems and vehicles with driving systems. Both can be very different to drive but can have an impact on safety outcomes.
* Electric Power Assisted Cycles (EPACs) should be explicitly excluded from the scope of the Directive. They are treated as bicycles within national regulations and excluded from European Type Approval, the Motor Insurance Directive, and in the current Driving Licence Directive.
* Re-assessment should be a part of this lifelong learning and training should be incorporated after the initial training and testing to retain the licence.

Speed Management

Speed is an important part of the Safe System approach. In around 30% of fatal crashes, speed is an essential contributory factor and exceeding speed limits is very common. Typically, 40 to 50% of drivers travel faster than the speed limit, and between 10 to 20% exceed the speed limit by more than 10 km/h[[27]](#footnote-27). ETSC[[28]](#footnote-28) claim that 2,100 lives could be saved each year if the average speed dropped by only 1 km/h on all roads across the EU. The EU should look at speed management also through the lens of health, the environment, and modal shift. Reducing speed, particularly in urban areas, also has an impact on improving the quality of air, reduce CO2 emissions. This should also be seen through the lens of modal shift, in other words lower speeds will mean more welcoming roads for cyclists and pedestrians with all the modal shift and attendant health/environmental benefits.

*Recommendations*

* Encourage and recommend EU Member States to adopt as default maximum 30km/h in cities where people walk, cycle, work, and play.
* Bind EU funding for transport projects in and around urban areas to SUMPs and decrease in speed.
* To encourage “Speed” to be at the centre of national road plans and strategies.
* Keep an inventory of all cities that have implemented a default 30 kph limit along with a ‘How To’ file. Used as a way for cities to point to other cities that are doing the same so citizens fell part of a movement, and to enable cities a ready-made box of tools or communication tools.
* Encourage Member States to improve speed limit signs to be working with vehicle speed assistance systems. Also to improve speed limit mapping data that can work with in vehicle camera technologies.
* Improve the Intelligent Speed Assistance mandatory requirements in vehicle Type Approval (See Vehicle GSR).

Helmets

It is essential that road safety is incorporated into improving environmental, social, and health benefits to society. There is good evidence that shows a link between mandatory helmet laws and a reduction in the number of cyclists[[29]](#footnote-29). ECF therefore does not support a mandatory law banning cycling on condition of helmet use. The use of a helmet should be a choice for the individual cyclist. Cycling is not such an overly dangerous activity that is requires a generalised law that would ban cycling without the required use of a helmet. This runs also to the European Commission’s Road Safety Strategy and KPI on measuring helmet use. Given the ineffectiveness of helmet use, this does not measure safety, rather it measures the fear that a cycling population feels when sharing the road. We are also concerned that when the KPIs are set to outcome targets based on the indicators, and when Member States are to be assessed on these measures, it will be a simple question of imposing a helmet law to improve a countries safety ‘score’ while in fact reducing cycling numbers. There are a number of ways to improve cycling safety and banning cycling unless riding with a helmet should not be a consideration.

ECF believe that what a cyclist wears should be his/her own choice. We think that wearing a helmet should not be mandatory and imposed by public authorities. Cyclists typically live longer and healthier lives; serious head injuries are rare and the evidence in favour of helmet wearing and helmet laws is weak. The main effect of helmet laws has not been to improve cyclists’ safety but to discouragecycling, undermining the health and other benefits.

*Recommendations*

* Do not promote bicycle helmet mandatory laws.
* Focus on well-established measures to promote cycling and cyclists' well-being.
* Recognise that the benefits of cycling far outweigh the risks.
* Refrain from promoting or enforcing helmet wearing without sound evidence that this would be beneficial and cost-effective compared to other safety initiatives.
* Remove bicycle helmet from the Commission Road Strategy KPIs measurement.

Other issues

Key Performance indicators and data **-** ECF has a list of KPIs that we think would be useful for improving cycling safety in the annex for cycling and walking. ECF would also recommend excluding bicycle helmet use measurement amongst the KPIs, and certainly not to be included in the targets or goals that could be forthcoming from the EU Road Safety Strategy[[30]](#footnote-30). Given the low numbers of 3rd party crashes by pedestrians and cyclists, we would recommend cycling and pedestrian modal shift numbers to also be considered as safety indicators.

We do not have clear ideas concerning single bicycle crashes, we do not have a clear idea of serious injuries. We do not know how many or how often people are cycling and therefore we have no idea of the risk of cycling in each country. We know how many cyclists are killed at night in the various EU countries but as we have no idea how many are cycling at night we have no idea if this is a risky problem area for cyclists.

The paucity of data makes it very hard to make important policy decision and strategies to improve cycling safety. We know that HGVs and large vehicles are dangerous for cyclists, but is this a problem in urban areas or on long distance straight rural routes? What type of large vehicles are involved, articulated trucks or smaller rigid lorries? Construction trucks? The complete lack of data that member states collect is making it difficult to come up with clear transport safety policy.

*Recommendations*

* It is crucial that Member States know the extent of cycling in their countries. Not only to understand risk of cycling in various environments but also to plan for cycling investments. Exposure data is crucial here. Member States should collect data on kms or time travelled on various modes to track modal shift, transport risks and other key metrics.
* A priority ordering should be made of the current list of EU KPIs, with speed at the top of the list, bicycle helmet use is not necessarily measuring a safety indicator and should be dropped.
* Adoption of specific targets to reduce deaths and serious injuries of vulnerable road users.

Drugs and alcohol – around 25% of road fatalities are linked to drink-driving[[31]](#footnote-31), and around 15% are linked to drug-driving[[32]](#footnote-32), it is important that this behaviour is curtailed for all road users but especially for those with large, powerful vehicles.

*Recommendations*

* Propose an EU wide zero (or at least 0.2% BAC) tolerance for all drivers.
* Mandate the use of alcolock devices for all recidivist drivers, and professional drivers.
* Put in place a standard for roadside checks and enforcement, including all for all illicit psychoactive drugs.

Professional transport- Trucks, vans and buses will be increasing on our roads given the current direction of the economy and transport policy. Cyclists as well will be increasing given the health and environmental situations that Governments are being faced with. These vehicles will then be coming more and more in contact. The drivers of these vehicles should that often face long hours on the road before entering urban areas should be as rested and the least stressed as possible.

*Recommendations*

* The EU should work towards consistent levels of enforcement of working time across the EU.
* The EU should support efforts to counter fraudulent use of tachographs.
* Revise the Driving Licence Directive 2006/126 to mandate provisions set out for Group 2 drivers to apply to drivers of Category B vehicles using their driving licence for professional purposes.
* Van drivers should be subject to professional driving training.
* All vans should be fitted with top speed limiters.

ANNEX

1. ECF can recommend these following road safety Key Performance Indicators (KPIs) specifically for cycling.

|  |  |  |
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| ***Safety Performance Indicator*** | ***Justification*** | ***How to measure*** |
| Road user distance or time travelled (for all modes) | Exposure data (as mentioned in the data/statistics section) to help track down and focus on areas of risk and help us understand where and how safety interventions are working | Survey of random sample on travel behaviour or counting methods |
| Road user target fatality rate for member states | Road user target fatality rate (to be used with exposure) to inspire individual Member States to reduce risk within the transport system | Member State fatality figures along with exposure data measured above |
| % of cyclists and pedestrians with a ‘feeling of safety’ or ‘feeling of danger’ while using the roads | A ‘road satisfaction’ indicator, as a way of making sure that road safety measures are not simply moving road users from cycling to more protected modes. A road safety intervention can make cycling safer by reducing cycling numbers, but this should not be the intention. The perception of risk is also a good indicator for the success of road safety interventions | Survey of random sample from whole population not just cyclist as it will be important to include those thinking of cycling. Can be done on the road or junction (as is carried out in Copenhagen[[33]](#footnote-33)) |
| % of road network safe for cycling | Basic indicator on whether the road network is safe for cyclists | Consider adapting a common framework for several indicators referring to safe network, safe routes etc. Simplest version would be to define a street section as safe for cycling, if it meets one of the following criteria:* speed limit 30 km/h
* equipped with cycle lanes (separation from motorised traffic by horizontal markings only)
* equipped with cycle paths (separation from motorised traffic by construction)

The definition might also include some quality requirements (e.g., paved surface, minimum width). It can also reference the cycling infrastructure guidance as described in section …The same definition should be applied consistently to indicators on % of network, % of population with access to safe cycling routes, % of children with safe route to school |
| % of population with access to safe cycling network | As above, but with more importance given to roads in densely populated areas |
| % of population in age range 8-18 with a safe cycling route between home and school | Safe cycling is particularly important amongst children and younger people as a way of building independence. Roads should be safe to cater for everyone. Safety for young people and children on the road acts as a proxy for the safety (and perception of safety) of the road infrastructure for cyclists |
| % of road network with speed limit 30 km/h or lower | Alternative (for % of road network safe for cycling) set of more detailed indicators. Can be also used in connection with as sub-indicators | See Above |
| % of road network equipped with cycle lanes |
| % of road network equipped with cycle paths |
| % of national roads (including motorways, expressways etc.) with alternative long-distance routes for cycling | See section on changes to the Road Infrastructure Safety Management Directive. There are many areas along longer distance routes that are (or could be) popular with cyclists. There are many serious cyclist crashes outside of urban areas (around 40% of fatalities outside urban areas). | % of national (primary, strategic etc.) roads with signed alternative routes for cycling |
| Total length of certified EuroVelo routes [km] | EuroVelo is a network of European long-distance cycle routes with well-defined and widely accepted certification criteria. This allows to measure not only the quantity but also the quality of cycle infrastructure on European level. | ECF is maintaining a database of EuroVelo routes, including information on certification status. The information is available down to a scale of 1 km |
| Member states with long term road safety programs including cycling action plan. | For good governance and continued focus on road safety improvements public authorities should have goals and outline how to achieve their goals | Counting of national action plans |
| % of third-party crashes by mode | Understanding crash opponents would be useful data to understand. Risk for third party crash opponents. | Number of crash opponents between and within modes of transport  |

1. Benefits of cycling

ECF has produced a document highlighting the Benefits of Cycling[[34]](#footnote-34). At current levels, cycling already produces benefits for the EU in excess of 150 billion euros per year. More than 90 billion euros of this comes from positive externalities for the environment, public health and the mobility system. Benefits include:

* Cycling reducing CO2(e) emissions by more than 16 million tons per year.
* The overall value of reduced air pollution though cycling equalling around 435 million euros.
* The overall value of reduced noise pollution through cycling equalling around 300 million euros.
* The current levels of cycling in the EU correspond to motor vehicle fuel savings of more than 3 billion litres per year (fuel savings of almost 4 billion euros).
* Cycling preventing 18,110 premature deaths per year in the EU-28. This corresponds to an economic value of 52 billion euros per year.
* The value of the bicycle market in Europe was estimated at 13.2 billion euros in 2016.
* There is an estimated 2.3 billion cycle tourism trips per year in the EU, with a total economic value of 44 billion euros.
* The value of congestion easing through cycling for the EU equals around 6.8 billion euros per year.
* The annual costs for the construction and maintenance of infrastructure for motorised transport that are saved through cycling in the EU amount to 2.9 billion euros per year.

This list of benefits highlights the need to link cycling safety with cycling promotion and for safety to be a key tool to increase the numbers of cyclists.

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11. <https://ecf.com/news-and-events/news/eu-mandatory-vehicle-regulations-pave-way-great-leap-cycling-safety> [↑](#footnote-ref-11)
12. <https://ecf.com/sites/ecf.com/files/ECF_Position_ISA_Implementation_Final.pdf> [↑](#footnote-ref-12)
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