



INTERNATIONAL
FEDERATION OF
PEDESTRIANS

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Subject: Vehicle safety – technical rules & test procedures for intelligent speed assistance

We applaud the EU taking a leading position in reducing Road Danger by the implementation of the Global Safety Regulation, and especially the inclusion of the Intelligent Speed Assistance in that package.

However, the REGULATION (EU) 2019/2144 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 stipulates that the “driver to be made aware through the accelerator control, or through dedicated, appropriate and effective feedback”.

The draft delegated regulation totally fails to comply with this requirement voted by our democratic representatives, by accommodating systems that are known to be all but effective. The cascading acoustic or vibrating warning options are so irritating that drivers will simply switch the systems off, which is allowed by the regulation. Switched-off ISA systems are obviously not effective.

By not requiring ISA systems to detect region nor sub-signs for time or vehicle category, the technical commission further deteriorates the value of an ISA system in a vehicle. There are no justifiable technical nor financial reasons for this. Not having region nor sub-sign information deflates the reliability and customer value of an ISA system, nudging drivers to switch the system off. As mentioned, switched-off ISA systems are obviously not effective. This shortcoming in the draft delegated regulation makes it non-compliant to the 2019/2144 regulation.

We regret that the technical commission has yielded to heavy lobby work from vehicle manufacturers, neglecting the commitments made by the EU and the UN regarding Road Safety and halving the fatality rate on our roads by 2030. There should be no competitive advantage given to sloppy safety systems on our roads. Features known to strongly reduce driver acceptance such as the cascading acoustic or vibrating warning and the severe shortcomings in sub-sign recognition should be removed from the technical regulation, especially given the imposed requirement that the driver can switch off the system. An important fraction of the victims are NOT the people purchasing or using the vehicle, but other road users including other car users, cyclists and pedestrians.

We also fully support the comments and suggestions given by ETSC and ECF.