EUROPEAN TYRE & RUBBER manufacturers' association

EC consultation on 'Driver training and Traffic safety education'

European tyre industry contribution

Brussels, 23rd July 2009

The European tyre industry would like to thank the European Commission for consulting stakeholders on how to improve driver training and to increase traffic safety education.

Tyres play a crucial role in terms of safety, being the sole point of contact with the road. Based on this reality, our industry has intensively pursued its investments in technological innovation and has initiated dedicated wide safety campaigns towards consumers and authorities to raise awareness on tyre related actions with regards to road safety.

Our industry campaigns confirm that young people represent a 'priority group' to be targeted in an appropriate way so that to prevent driver behaviour posing risk to safety.

The tyre industry experience is shared in the following comments and suggestions:

Q1: Do you think that driver training systems should be harmonised in the EU ? If so, what advantages would it have for traffic safety, and what problems do you expect ?

In Europe, there are three categories of driving licensing systems, which provide diversified learning and develop various habits. As a result, young drivers do not acquire the same knowledge and experience on how best to maintain the vehicle in safety conditions and on the appropriate reflexes to be adopted to avoid putting at risk the safety of road users.

However rather than promoting a single system, the European tyre industry thinks that the most result-oriented approach in terms of increased road safety, would be to define a harmonized EU Highway Code and mandatory minimum requirements for safety education based on clear facts and figures to be part of the obligatory skills to be acquired by the learner. It would be then up to the Member States to decide, on the basis of their respective experiences, which system to be used to implement these requirements.

As a matter of example, the EU legislation could go further in its harmonization policy in clearly detailing key safety requirements and skills that would have to be known by the future driver.

ETRMA Aisbl
2/12 Avenue des Arts
1210 Brussels Belgium

Tel +32 2 218 49 40
Fax +32 2 218 61 62
www.etrma.org

EC Register : ID 6025320863-10

In particular, the 3rd Driving Licence Directive (2006/126/EC) of 20 December 2006, enforceable from 2013 onwards, will impose further harmonisation of the driving tests within Europe. It recognises the importance for drivers of being able to check the aspects of their tyres in including into the driving tests the following requirements:

- In Annex II: Minimum requirements for driving tests

In the Theory Test:
2.1.7 Mechanical aspects with a bearing on road safety; applicants must be able to detec the most common faults in particular in ..., **tyres**, ...

4.2.3 The principles of the construction, the fitting, correct use and care of tyres

In the Test of Skills and Behaviours:
Performing a random check on the condition of the **tyres** is requested concerning vehicle categories:
- A1, A2 and A (**6.1.2**),
- B, B1 and BE (**7.1.4**) and
- C, CE, C1, C1E, D, DE, D1 and D1E (**8.1.3**)

- In Annex IV : Minimum requirements for persons who conduct practical driving test

1.7 Knowledge about vehicle technique and physics such as **tyres**, …

The tyre industry believes that beyond the mention of 'tyres' as part of the minimum requirements, which we totally support, it would be more beneficial in terms of enhanced road safety if clear details of what specific controls should be carried out concerning tyres are formally stipulated into the Directive.

Indeed when teaching the importance of knowing 'the construction, fitting, correct use and care of tyres', at least the following elements should be made mandatory:

- Tyre pressure

Driving with tyres at the right pressure is the most important tyre parameter since only a properly inflated tyre holds the load, adheres to the road, consumes less fuel and produces less noise. Indeed an under inflated tyre can further put safety at risk as it may collapse and consequently cause an accident. Low tyre pressure has an extremely negative effect on tyre durability, due to excessive stress in the tyre shoulder and heat build-up from sidewall bending. Under-inflated tyres can increase fuel consumption by up to 4%, as they require extra energy to roll. Around 65% of European cars have permanent under-inflated tyres.

Recent industry studies performed across the European Union have demonstrated that two third of motorists are unaware that a tyre naturally loses pressure over time, just like a balloon does. About 10kPa can be lost each month in cool weather and even more in warmer weather, entailing a loss of handling control and a sharp increase in vehicle drift.

The tyre industry therefore supports that explaining how regular the tyre pressure should be checked is part of the mandatory safety checking to be taught to new drivers. Additionally this will positively impact the fuel consumption and as such reduce CO2 emissions.

The EC consultation paper on "Driver training and Traffic safety education" provides an encouraging European Commission emphasis on the proper tyre maintenance. It recognizes under 4.3.8

'Environmental awareness and eco-driving' and in the Annex 1 'GDE matrix', the importance of inciting driver applicant and instructors to performing "regular checking of tyre pressure". Additionally, the tyre industry welcomes that further to our active promotion of the mandatory fitment of tyre pressure monitoring systems (TPMS) on passenger car -as a key safety tool to warn drivers when any tyre is operating at a dangerously low pressure level-, the EC proposed Regulation on general safety of motor vehicles (COM 2008/316), adopted by the Council end-June 09, has included this obligation as part of its requirement. This is the first step in recognising the benefits of the tyre pressure for road safety as well as energy efficiency of the vehicle.

- Tyre tread depth:

According to EC Directive 89/459 of July 1989, passenger car tyres must respect a tread depth of the tread surface of at least 1.6 mm. Driving with proper tread depth is indeed crucial to ensuring safety of the vehicle and its passengers especially with regards to the wet braking and aquaplaning performances.

However several ETRMA members have carried out tyre-checking operations, which have demonstrated that 1 in 3 drivers fail to check tyre tread depth, with potentially serious repercussions for vehicle and passenger safety. A recent study carried out by the UK tyre safety organisation, TyreSafe, in January 2009 on 60 000 cars has shown that 10% are driven with at least one illegal tyre ! Extrapolated at the country level, close to 4 million of UK drivers are not respecting the law.

It would therefore be essential include a mandatory element in drivers' training on regular checks of the tyre tread depth with respect to the 1.6 mm minimum requirement.

The industry welcomes the mentioning of the risk of driving with "worn-out tyres"in the EC consultation paper on "Driver training and Traffic safety education" (Annex 1 'GDE matrix) as an encouraging European Commission emphasis on the proper tyre maintenance.

- Proper use of adequate tyres in particular climatic conditions.

A road is always less predictable in winter than in hot weather. Under snowy, icy and wet conditions the surface always gives relatively less grip than in summer and that consequently inevitably affects road safety.

A winter tyre is therefore specifically designed for use in icy and snowy conditions, in far lower temperatures than general use of tyres (less than 7 degrees) and in vastly differing road conditions. It allows the driver to optimise adherence/grip on snow, reduces fuel consumption and provides excellent traction, thanks to a dedicated tread. Additionally, it reduces the risk of aquaplaning thanks to its specific form, which is designed to displace the water passing under the tyre. For these reasons, summer tyres with chains are NOT an alternative to winter tyres !

In some European countries such as Austria, Germany, Scandinavia and Switzerland the legislator has already introduced an obligation for drivers to shift to tyres more appropriate in the winter season, usually from October/November until April.

The tyre industry therefore supports that future drivers are alerted when learning driving on the importance under typical winter conditions of fitting his car with appropriate winter tyres, for safety benefits.

For each of these tyre safety items, ETRMA is ready to develop with the European Commission an appropriate set of 'best practices' to provide authorities with a clear detail of the information to be properly communicated.

Q2: Should traffic education at school be mandatory ?

Young drivers are novice drivers who represent a group most at risk in terms of road accidents as they have limited experience. Most of the time, they show a great interest and impatience to start learning driving as soon as possible. They consequently need an increased focus compared to other group of the population in order for them to acquire sufficient knowledge of the vehicle and of the Highway Code to driving in the safest way.

Such reality has been confirmed by the results of the e-safety quiz developed by ETRMA as a contribution to the 2nd European Road Safety Day organized in Paris in October 2008. The participation from young drivers being 25 years old as a maximum reached more than 20% of all the respondents. Their replies confirmed that they have limited knowledge of key safety behaviours notably regarding tyres:

- Where best should be installed a pair of new tyres ? 92% of wrong replies *versus* 50% for people between 26 and 49 years old;
- Why checking summer tyre tread depth ? 97% of wrong replies *versus* 25% for older people groups;
- Where to check the tyre pressure? 53% of young people ignore that a tyre pressure gauge is available at a petrol station or at any concessionaire.

For these reasons, the European tyre industry believes that it would be recommended that key elements of a road safety education are mandatory taught at school like the respect of speed limits especially in town centres, wet braking, safety behaviours towards the other road users, proper vehicle maintenance (easy and frequent actions), mandatory use of safety belt, knowledge of road signs and respective attitudes, ... Generally on proper use of tyres, drivers should be aware from the very beginning of their driving experience of the serious impact on vehicle safety from tyre misuse (e.g. sidewall damages after running for considerable time at improper tyre pressure or after hitting a curb/ pot-holes, etc.).

This would allow sensitising children on proper safety behaviours to be adopted when they are on the road and consequently prepare them to undertake appropriate actions when learning driving. Additionally, the safety messages would certainly go beyond schools and be delivered to the children relatives, giving a broader audience.

Q3: Should driving instructors undergo continuing professional development ?

Yes, it is of upmost importance that driving instructors are continuously updated and trained on the new developments regarding potential changes to the Highway Codes and innovative technologies able to assist the driver in raising his awareness on key safety aspects.

To this end, the driving instructors should undergo on a regular basis, e.g. every 5 years, a mandatory Road Safety Training to personally test 1) the consequences of driving with a vehicle under wrong/non appropriate conditions and 2) the effects of existing new technology to assist the drivers.
This would allow transmitting to novice drivers, convenient reflex and behaviours to be adopted to ensure safe driving.

ETRMA is ready to explore with the European Commission the conditions for developing appropriate training modules related to tyres.

Q4:Should coaching be emphasised more as teaching method for driving instructors ?

The analysis provided in the EC consultation paper on "Driver training and traffic safety education" proves some benefits from coaching, namely a better awareness of the driving learners of the safety aspects on the road acquired through self-experience. A balance between the two methods is necessary, and it would be a good approach if driving classes integrate a coaching element.

Q5: Should post-test practical experience models be encouraged ?

Post-test practical models are certainly guarantors for more road safety. At present, Luxembourg is the only EU country with a compulsory practical test to be taken within two years after the driving training test. At the same time, Luxembourg is amongst the EU champions in reducing road deaths (June 2009 statistics from the European Transport Safety Council). Other countries where such a test is optional, e.g. Austria, Switzerland, have also reached good results in the fight against road traffic fatalities. It can be argued therefore that there is a certain correlation between post-training testing of novice drivers and their safe driving, and such practices should be more widely promoted.

Q6: Should accompanied driving systems be encouraged? Should they be harmonised at EU level?
Q7: Should accompanied driving systems with 'lay instructors' be encouraged ? Should there be training requirements for lay instructors ?

The European tyre industry has no estimate on the rate of driving licences successfully obtained through accompanied driving systems.

The sector is of the opinion that to ensure the relevant safety criteria are well taught, specific and stringent requirements should be set for the accompanying person as he/she is not a professional even if this person has his/her driving licence for a certain number of years. Indeed, the lay instructor might not be correctly updated on potential latest change in the Highway Code. Additionally, he/she will not have followed the specific training dedicated to driving instructors and may not consequently offer the same level of teaching as a professional would do.

Q8: Do you agree that the minimum age of solo driving (with a category B licence) should be 18 ?

The European tyre industry thinks the minimum age of solo driving should allow sufficient maturity for adopting the appropriate safety behaviour in all times. As the 'majority age' is fixed in many countries at 18 years old, the same age can be maintained as the minimum age of solo driving a car.

Q9: Should more use be made of computer-based training systems ? If so, in which areas ?
Q10: Should more use be made of e-learning ? If so, in which areas ?

As young people represent a group to be addressed in priority, it could be appropriate to focus some key safety education activities using the computer and/or e-learning devices. Indeed using such kind of materials could more easily attract the attention of driver applicants. In addition, they could experience through specific programmes the consequences of driving with unsafe conditions because of alcohol, tiredness, under inflated tyre, ...

For further contact:
Mrs Fazilet Cinaralp, Secretary General
+32 2 218 49 40, f.cinaralp@etrma.org