



Brussels, 20 November 2009

**AGE response to European Commission consultation
relating to the preparation of a
EUROPEAN ROAD SAFETY ACTION PROGRAMME 2011-2020**

AGE welcomes the opportunity to respond to this consultation and would like to contribute the following reflections to the questions posed by the European Commission on a European Road Safety Action Programme 2011-2020.

Our response was developed in consultation with our members and transport experts. As a general comment, we appreciate that older people are included among the category of road users, as well as the fact that our ageing society is mentioned as an issue that must be taken into account.

Nevertheless we highlight that the involvement of older road users both in the design process of safety measures and in their institutional, legislative and monitoring aspects is missing, in antithesis with the broad range of stakeholders that this Open Public Consultations aims at involving.

In addition AGE is concerned about the lack of reference to the Public Transport System and Services in this Consultation: public transports are consistently relevant for any further discussion about road safety and their role and responsibility should be further investigate and underlined in the Action Programme 2011-2020.

Personal perception of the situation on the road in your country

Do you think that, in general, traffic in your country has become safer or less safe than 10 years ago?

The perception:

Older people are in general of the opinion that pedestrians are less safe today and they agree in finding both urban and rural road less safe for older road users, even if they believe that those roads have become safer for other groups compared to the road safety they experienced in their youth.

Older people regret that older drivers are often perceived as a threat for road safety because they are considered to need longer time to react, to suffer from vision and hearing impairments and to have driving abilities which are no longer adapted to today's traffic conditions. Whilst some older people share this negative opinion about older drivers, most just feel that it is the traffic that has become more congested, but the problem is not the slower reaction time of older drivers. Usually older people agree that road signals for cars, pedestrians, cyclists and other riders improve road safety but also complain

that the complexity of road signaling and the numerous interference with other types of signaling (such as advertising material) creates confusion in some situations. Older people also feel that the increasing lack of respect of traffic regulation and respect for other road users leads to higher road unsecurity.

... but what is the reality?

Each year, nearly 1.3 million people die and between 20 million and 50 million more are injured as a result of road crashes¹. What about older people? « Elderly drivers are not really a threat for the other road users. The increased number of road accidents with serious injuries and fatalities for elderly people is due to their increased frailty, as well as to their reduced driving ability attributed to limited driving and physical impairment (NTUA, 2009). We could say that elderly drivers have a higher risk for road accidents, which is though balanced by the reduced exposure (driving) and the lower speeds² ».

As pedestrians however, older people run a higher risk: more than one third of elderly fatalities are pedestrians and also elderly people are proportionately more likely than middle-aged people to be killed in an accident in an urban road.

Older people are not so often involved in single vehicle accidents, but they are overrepresented in multi-vehicle crashes. Accidents involving older drivers typically occur at intersections, with the dominant accident type described as turning against oncoming traffic that has right-of-way on a main road³. This can be caused by personal difficulties in driving, confusion in reading too many road signs at intersections or the lack of respect of traffic regulation by other road users. One thing is sure: road safety has a particular relevance for older people, as the coming answers will highlight⁴. The vulnerability of older users varies a lot between Member States. This is influenced by the driving “culture” (attitude toward other road users), safety features of the road infrastructure and vehicles with the result that older road users are safer in countries such as the UK and less safe in others such as Romania.

What are the main problems and issues at stake in road safety?

Older road users have on average a 16% higher risk of being killed in a road accident compared to younger road users (Road Safety Performance Index 2008). In our view, one of the main concerns that needs to be addressed is the impact of demographic ageing on road safety as we can logically expect an increasing number of death and serious injuries among the elderly. The rapid ageing of the European society requires that swift action is taken to take better account of the specific needs of all categories of older road users. This

¹ <http://www.un.org/en/roadsafety/>

² Breker et al, 2003

³ Ragnhild Dadidse, *Assisting the older driver; intersection design and in-car devices to improve the safety of older driver*, 2007.

⁴ The Road Safety Performance Index elaborated by the European Transport and Safety Council (ETSC)-states that: “at least 8.260 people 65 years old and over were killed in the EU 27 in 2006. While older people account for one sixth of the European population, every fifth person killed in road traffic is aged 65 or over”.

is necessary to avoid human suffering but also to counter the significant socio-economic consequences of road users' death and injuries.

In both urban and rural contexts all over Europe, mobility is an issue for older road users: the public transport network is not so often suited to the needs of certain groups, such as older people and people with reduced mobility. These services do not have the necessary geographical coverage to meet the needs of older people living in rural or isolated areas. Often in these areas, road safety is even more an issue and it includes some relevant aspects related to seamless, reliable and affordable mobility for all. This is why we welcome the question related to the category of users which takes in account the wide range of users and not just car drivers. Older pedestrians are a particularly vulnerable group of road users.

However, there is one important category missing: the users of buses and trams, as well as other public transports' users. Safety is a main issue for those users, too. The lack of information, advice and support also have an important role in assuring safety; the older one gets the more vulnerable one feels: one of the biggest deterrents for older people's inclusion is the lack of reassurance about their safety. Safety is therefore linked also to the way streets are lighted, the design of sidewalks; the presence of police on the streets. All such measures are considered important to improve the feeling of safety, besides its professional role for the society and the respect of road and civil rules.

Which, in your view, are the most important countermeasures amongst infrastructure, road user (training, education, rehabilitation, enforcement) vehicle safety measures?

Infrastructure

As far as the planning, design and maintenance of the road network are concerned, attention should be paid to remedial actions at high-risk crash sites, to traffic easing and speed control.

Infrastructure design standards should include:

- Traffic light management i.e. appropriate traffic gaps for safe crossing including for the elderly, as well as conflict-free crossing at traffic lights;
- Reducing risk for pedestrians at crossings, where design must ensure that vehicle users behave as expected and the crossings are kept clear of obstacles;
- Ensuring local continuity of walking route and reduced physical effort with limited gaps between pavement and road way;
- Enhancing mutual visibility of pedestrians and drivers;
- Constructing safe crossing along roads with particular specifications (commercial streets, leisure or residential areas, areas near senior homes);
- through reduced width of roadway to cross or reduced speed of vehicles;
- Introducing new technologies, such as automatic systems that may also contribute to the improvement of pedestrians' safety at junctions, such as detection of waiting pedestrians, automatic extension of pedestrian crossing times, accent illumination of pedestrian crossings, infrared

detector for crossing pedestrians and electronic sender for disabled pedestrians⁵.

Besides this concrete advice, AGE underlines that, in order to achieve safe mobility for older people, effective transportation alternatives to cars should be offered to older people well before they reach the age at which they are no longer able to drive. Governments are called upon to devote considerable effort to making it possible for people to choose their modes when they have problems driving and for all their needs.

Road users measures

The issue on driving licence is of particular concern to AGE. Our organization supports the promotion of the harmonization of issues related to the release, maintenance and eventual renewal of driving licences in Europe, as well as their time extension. We regret however that in some countries, older people face age limits when seeking the renewal of their driver's licence. AGE members do not agree with the vision that reaching retirement age automatically results in the ability to drive and should as result to the loss of one's right to drive. In our view ageing does not imply that impairing physical and mental impairments arise all of a sudden. The Council Directive on driving licence⁶ should be improved to take this principle. AGE calls therefore for the deletion of age limits to the renewal of the driver's licence and for an equal and reasonable application of restriction to the right to drive based on medical check-ups and driving tests, but not merely on the ground of age.

The use of age limits is particularly relevant in relation to the use of public transports. In some Countries, people aged 65+ have the right to use free public transports. Such initiative aim at encouraging older people to shift to public transport. However, everyone should be encouraged to use public transports, not only older people and awareness action should be put in place for all ages. The sooner citizens learn to use public transport, the better. It is indeed better not to wait until one loses their visual, hearing and motor abilities to shift to public transport as they will feel more at ease using it once they grown old.

With regard to training, attention should be paid to community-wide health promotion campaigns and education programs, training programs for pedestrians, motorcyclists and cyclists. Within a special focus on older people's needs. Education should include visibility-enhancement measures, such as headlight devices and color of helmet, clothing, and vehicle⁷. The media could play a big role in raising awareness of the efficiency of such measures to enhance road safety for all.

AGE supports the practical measures presented in several studies and paper works and lists the following actions:

⁵ http://www.euroipn.org/eunese/Documents/FS%20EN/FS_RTI.pdf

⁶ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31991L0439:EN:HTML>

⁷ Fact Sheet EURO/03/04, Road traffic injuries in the WHO European Region: the population groups and countries most affected, World Health Organization, Europe, Copenhagen, Rome, 2004

- Increased length of the pedestrian green phase in signalized crossings, and the use of systems that can detect pedestrians in the crossing and prolong the green phase if needed.
- More pedestrian crossings & particularly signalized crossings.
- Extended use of traffic islands, reducing the demand on pedestrians to observe traffic in both directions simultaneously.
- Extension of the sidewalk at pedestrian crossings, so that pedestrians standing at the curb are in line with the roadway side of parked cars, achieving in this shorter crossing distance and improved mutual visibility between pedestrians and motorists.
- Better pavements maintenance in crossing areas, reducing the need of pedestrians to watch out for potholes and other irregularities.
- More pedestrian areas and improvement of the walking surface⁸.

Besides training, licensing and testing, a greater involvement of older road users should be sought to develop a vast mapping of the traffic environment from an elderly perspective, as this means strengthening the feeling of belonging to the community and provides fresh and updated information to local authorities⁹.

Road users measures enforcement

AGE believes that sharing best practice and establishing recommendations and regulations based on successful measures would help cities and towns meet their road safety and personal security challenges in urban transport, as well as transfer and adapt experiences and solutions to local contexts.

Information should not be restricted to public transport authorities and public authorities, but should reach all citizens and should be provided by professional bodies allied to media briefings, in a clear and concise way.

The Consultation stresses on law enforcement. Regulatory and other actions that address those risk factors have led to dramatic decreases in road crashes in many countries. AGE welcomes this approach, but highlights the importance of a revision of the Council Directive on driving licence¹⁰.

Vehicle safety

A number of factors have been identified as increasing the risk of traffic-related injuries, including inappropriate and excess speed, non-use of seat belts and child restraints, drinking and driving, non-use of helmets by riders of motorized two-wheelers, poorly designed or insufficiently maintained road infrastructure and vehicles that are old and not crash protective, not well maintained or that lack safety features.

Sometimes the vehicular design must be more efficiently involved in the discussion, as well in the solutions proposed to consumers: particular designed air bags, alcohol ignition interlock systems or accessible swivel

⁸ Petridou E, Dikaloti S, Dessypris N et al. The Evolution of Unintentional Injury Mortality among Elderly in Europe. Journal of Aging and Health. In press

⁹ Such an experiment has been made through the Senior-OLA project in Sweden (http://www.vv.se/templates/page3___19602.aspx)

¹⁰ See also page 4

seats are affordable technologies, but their market penetration is not sufficient yet, to the detriment of road safety.

With particular regard to the car built environment, some measures to mitigate injuries to elderly car occupants refer to the introduction of smart seat belt load limiter and electrically powered lift-up and swivel seats¹¹.

What do you see as the key problems or issues for institutional management of road safety?

Institutional leadership and coordination

- need to further strengthen international cooperation and knowledge-sharing in road safety and increase related financial support

Legislation, funding and resource allocation, promotion

- The fact that the cost of failed transport solutions fall upon the wider community should be also mentioned.
- Road traffic injuries threaten to hinder achievements in economic and human development. It has been estimated that global losses due to road traffic injuries cost Governments between 1 and 3 per cent of their gross national product. In some low- and middle-income countries, the loss is more than the total amount of development assistance they receive. Road traffic injuries place a heavy burden on a country's economy as a result of their direct impact on health-care and rehabilitation services, as well as through indirect costs. They also can put considerable financial stress on affected families, who often must absorb medical and rehabilitation costs, funeral costs and such other costs as the lost earnings of the victim, in addition to extensive emotional strain.
- Experience from around the world has identified that the creation of an adequately funded lead agency on road safety and an accurate assessment of a country's road safety situation are important steps that need to be taken to effectively tackle road traffic injuries

Some aspects in legislation/regulation/enforcement: minimum legal drinking age laws; alcohol sobriety checkpoints; lower blood alcohol concentration; limit laws; mandatory bicycle and motorcycle helmet laws; enhanced enforcement programs for safety belt laws; administrative per license suspension laws; licensure suspension laws; night-time visibility-enforcement measures; daytime running lights; speed enforcement detection devices.

Monitoring and evaluation, knowledge transfer, research

Is the integration of road safety into other areas of EU policy effective?

Yes – No – Partially?

If not, in which sectors should this integration be improved?

¹¹ Toyota Mobility Programme has already designed and implemented those kinds of technological solutions for less able people, complying with all EC directive for both design and development and meeting the European Safety requirements
(<http://www.toyota-europe.com/cars/conversion/mobility/index.aspx>)

What should be the priority areas for action in the next programme 2011-2020?

AGE calls on the support from the European Union to a greater harmonization in road safety issues, to be achieved through the proper allocation of funding for both technical and societal research as well as for practical on-site improvements at local level through the Structural Funds and other relevant EU funding instruments.

The European Commission should use the proposal for a European Year for Intergenerational Solidarity in 2012 to propose action to make the urban and rural mobility better adapted to the needs of all, where the efforts for road safety take into account the road users of all ages.

Such initiative could gather the main stakeholders of road safety around the table (public authorities, transport authorities, road users) to reconcile the needs of the working population with the needs of retired people, children and their families.

A European Year for Intergenerational Solidarity could boost a great participation both from grass root level and political decision-makers, as well as a greater involvement of the media.

Thanks to a European Year for Intergenerational Solidarity, the topics of public transports' accessibility and affordability could also acquire visibility in the political agenda, thus tackling road safety issues from a wider and longer lasting perspective.

New technologies, innovative and intelligent transport solutions can improve safety, increase efficiency, protect the environment and offer new customer-oriented services to citizens.

New research activities should be addressed to boost the development of safer public and private vehicles, taking into account the needs of less able people.

Industry plays an important role and shares responsibility for road safety by designing and selling safer vehicles adequately equipped. Non-governmental organizations can reinforce governmental strategies, act supportively by informing about the problem of road traffic injury, identifying effective solutions, challenging ineffective policies and forming coalitions to lobby for improved road safety. Mass Media contribute significantly to awareness raising campaigns about road traffic injuries among elderly and inform the public at large and elderly themselves about the problem and the necessary measures.

AGE would like to recommend to the Commission not only to focus on new technologies and research, but also to take advantage of recent research outcomes to be implemented. As a matter of fact, it has been shown¹² that the mix of motorized and non-motorized traffic, together with frequent poor lighting, lack of access to retro-reflective equipment, absence of bicycle lamp

¹² World report on road traffic injury prevention, Risk factors, chapter 3, 2004: http://www.who.int/violence_injury_prevention/publications/road_traffic/world_report/chapter3.pdf

fitment and use of darkly colored bicycle helmets exacerbate already unsafe conditions. A review of European in-depth research found that one third of pedestrian casualties had difficulty in seeing the striking vehicle. Similarly, two fifths of drivers had difficulty in seeing the pedestrian. The more conspicuous a particular motor vehicle is to all other road users, and the more visible the other road users are to the particular driver, then the greater the opportunity of avoiding a collision¹³.

Concluding remarks

AGE welcomes this initiative aiming at engaging the European citizens and stakeholders in governments at national, regional and local levels on the improvement of Road Safety. To respond adequately to the challenges of reducing death and injuries and their societal impacts, as well as their socio-economic costs, a range of concerted EU actions are needed. These include:

- awareness raising;
- improving the mechanisms to monitor the level of road safety between and within Member States;
- supporting national actions to tackle the issues linked to road safety, in particular in terms of prevention through encouraging greater policy coordination, exchange of best practice and the provision of financial support such as the Structural Funds and other relevant EU funding sources.

AGE is well placed to contribute to these continuing discussions and to put forward the expertise of its members and transport experts to ascertain how improvements can be made in achieving greater safety on European roads. We would be happy to continue to work with the European Commission and other stakeholders on this issue to help improve road safety in the context of a rapidly ageing population. .

Recommendation no. 1

That each member state in the EU and in the EEA should establish national action plans for prevention of injuries in elderly people. Targets should be defined in a way that it is possible to measure if the targets are met. Prevention measures should be taken, and annual reports should be available. An interministerial taskforce lead by the Ministry in charge may further facilitate co-ordinated action in the countries.

Recommendation no. 2

That each member state in the EU and EEA establish health based injury registration systems enabling sound and valid injury statistics to be produced. The European Commission should ensure that such systems are working. With such systems it will be possible to compare the statistics across the countries in Europe, in order to monitor the injury situation, and to find the factors involved in the injuries in order to design preventative measures.

Recommendation no. 3

That each member state in the EU and EEA report the fatalities in elderly people according to common coding rules, ensuring that it is possible to compare mortality statistics across Europe. That World Health Organisation should increase their efforts to create a common understanding of the coding system and to control the quality of the statistics.

¹³ More than 30% of bicycle crashes in the Netherlands occurring at night or in twilight could have been avoided, it is estimated, if bicycle lighting had been used.

Recommendation no. 4

That each member state in the EU and EEA, together with the European Parliament and European Council establish a European Day for Road Safety. Such a common day across Europe might raise awareness on prevention of injuries in vulnerable groups such as elderly people.

Recommendation no. 5

That each member state in the EU and EEA build capacity for conducting research on injuries in elderly people: to understand their causes; to develop preventative measures; to plan and implement interventions; and to evaluate interventions for cost effectiveness.

Recommendation no. 6

That each member state in the EU and EEA develop networks at central and local levels to promote implementation of evidence- based best practices to reduce road injuries in elderly people.¹⁴

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¹⁴ Lund J and the EUNESE WG4 members: Priorities for Elderly Safety in Europe-Agenda for Action, EUNESE, 2006