

MAYOR OF LONDON

Commissioner Bienkowska

Commissioner for Internal Market, Industry,
Entrepreneurship and SMEs
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

Date: 31 AUG 2018

Dear Commissioner Bienkowska,

Re: Direct Vision for Heavy Goods Vehicles and the General Safety Regulation

I was very pleased to see the inclusion of direct vision requirements for Heavy Goods Vehicles (HGVs) in the General Safety Regulation (GSR) revision proposals outlined in the European Commission's Third Mobility Package on 17 May 2018. This is a positive step, but we need to move quicker.

HGVs are disproportionately involved in fatal collisions involving cyclists and pedestrians. In 2016, 23 per cent of pedestrian and 50 per cent of cyclist deaths in London involved a HGV, despite HGVs making up only four per cent of road miles in London. We must take action now to minimise road danger and create streets where everyone feels safe walking and cycling.

In September 2016, I pledged to restrict the most dangerous HGVs, those with the poorest levels of direct vision, from entering Greater London from 2020. This was prompted by the unacceptable number of collisions caused by vehicle blind-spots on our roads. Our work to introduce a London HGV Safety Permit Scheme is on track, with permits for the scheme to be issued in 2019. The Scheme involves the introduction of a new "technical regulation or other requirement" for HGVs over 12 tonnes which is covered by the notification requirements of Directive 2015/ 1535. The UK Government has recently submitted a notification on our behalf and I would welcome the Commission's timely support during this process.

Transport for London (TfL) has undertaken detailed research into the design of HGV cabs and the benefits of direct vision, which I know has fed into the GSR revision proposals and impact assessment. While there is a role for cameras and sensor technology in busy urban areas, the evidence shows that improvements to direct vision is the most effective way to prevent road casualties.

Whilst the issue is particularly critical in London, it is clear that a unified and consistent approach across Europe will result in many more lives being saved. I fully support the inclusion of direct vision requirements in the GSR review. However, the proposal as it stands would mean that improvements in vision would not be implemented until 2026 for new vehicle types and 2029 for all new vehicles. Even this would depend on the new Regulation being agreed in 2019.

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I also note that the setting of the precise standards is left to UNECE, which of course works to its own timetable. Given that some manufacturers have already introduced models with high-vision cabs, I believe we can and should be more ambitious: we should aim for new vehicle types to comply by 2024 and all new vehicles by 2026; and if UNECE do not produce a standard in time to facilitate this timetable, the European Commission should finalise that work itself.

I am aware TfL has committed to sharing their direct vision methodology and resources with the Commission. I would like to continue this knowledge sharing and propose London act as a trial from which we could share best practice for direct vision in the GSR. I would of course be delighted to provide any further details of our work in this area. You would also be most welcome to visit London to see for yourself what progress we are making. If you or your staff would like further information, my office in Brussels would be happy to assist. Please contact Ian Catlow by email at: ian.catlow@london.gov.uk or on: +322 650 0803.

Yours sincerely,



Sadiq Khan
Mayor of London

Cc: Commissioner Bulc, Commissioner for Transport
Vice-President Katainen, Vice-President for Jobs, Growth, Investment and Competitiveness
Vice-President Šeřčovič, Vice-President for Energy Union