

ANEC Response:**Public consultation on outline proposals for a Regulation of the European Parliament and of the Council on Advanced Safety Features and Tyres**

ANEC welcomes the opportunity to contribute to this public consultation regarding a new regulation on advanced safety features and tyres. In the past, we have expressed disappointment at the lack of transparency and restricted consultation for Commission activity in the area of transport and traffic safety. This public consultation exercise is thus welcomed.

In principle we support legislation on safety measures and requirements that will contribute to road casualty reductions and reductions in CO₂ emissions. This is in the interest of all consumers.

Simplification of regulatory regime is also a good goal, with potential benefits for manufacturers and consumers alike. By shifting all rule making to Geneva (UNECE level), processes are simplified. However, by the time a common European position reaches discussion in Geneva, it is often too late for European consumers to have any input or influence on the block European view or vote. This makes it even more important that consumers are involved in the pre-Geneva consensus process in Brussels (EU level).

We agree in principle that tyre improvements to reduce CO₂ emissions suggested in the consultation document should not compromise on minimum safety requirements.

In terms of the specific safety measures discussed in the consultation document, ANEC strongly supports making Electronic Stability Control (ESC) mandatory for light and heavy commercial vehicles. The safety benefits of ESC have been proven in accident studies all over the world. We moreover believe that there is relatively little extra effort required for manufacturers to equip their vehicle fleet with this technology. Thus, we support the mandatory installation of ESC for all categories of M and N class vehicles without any exemptions.

From the consumer point of view, implementation of ESC technology is already taking a long time. Given that equipping new car fleets with this technology is relatively straightforward, and that the Global Technical Regulation (GTR) on ESC

will be adopted in 2008, 2011 as a target for new car models to be fitted with ESC is definitely achievable. In fact, ANEC would prefer the deadline to be earlier, more in line with the timeframe of the Commission co-sponsored GTR.

The consultation document also describes other advanced safety systems, such as automatic emergency braking and lane departure warning systems. The assumption is made that there is a favourable cost-benefit analysis for both systems. ANEC is reluctant to propose a time scale for the mandatory introduction on such systems. These are two different technologies, and not comparable to ESC, thus without any underlying cost-benefit information or accident data, supporting these proposed long term measures is not prudent.

In summary, ANEC is supportive of the Commission's proposal for a Regulation on advanced safety features and tyres, with the goal of increasing safety and improving environmental efficiency.