

Free-trade agreements for vehicles the risks to the lives of UK road users



PACTS Briefing
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PACTS
PARLIAMENTARY
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Free-trade agreements for vehicles – the risks to the lives of UK road users

Overview

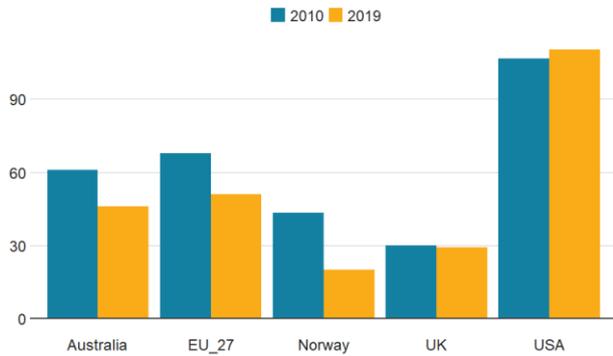
- The UK Government has opened discussions on free trade agreements (FTAs) with other countries, following the UK's withdrawal from the EU. The Government's current focus is on a UK/US FTA and a UK/Australia FTA on a wide range of products, including motor vehicles.^{1 2}
- FTAs inevitably involve negotiation on standards, including safety. The negotiations on food have already provoked public concerns over possible imports of "chlorinated chicken" and hormone-fed beef.
- US vehicle safety standards are significantly less safe than UK standards (which are based on EU standards), particularly front and side impact ("T bone") protection for car occupants. Furthermore, US and Australian standards do not include a requirement for safer car fronts or collision avoidance systems to protect pedestrians and cyclists in all new cars.
- Imports of larger, less safe cars, including SUVs and pick-up trucks, would present serious risks to the safety of UK road users, particularly pedestrians, cyclists, motorcyclists and occupants of smaller cars.
- In the UK/US FTA any trade benefits would largely favour the US. The UK automotive sector operates to UK/EU safety standards and will continue to do so for commercial reasons. Moreover, a federal UK/US FTA would not remove the requirement for UK exports to meet US State requirements for vehicle testing.
- The safety cost would be many lives and serious injuries and fewer people opting for healthy, active travel modes. The consequences would also be negative for carbon emissions and air quality. Road users' lives should not be traded off in the interest of removal of barriers to trade.
- **PACTS calls on the UK Government to ensure that:**
 - no vehicle is imported to the UK with lower than EU vehicle safety standards;
 - no vehicle is imported to the UK without recently agreed EU vehicle safety standards that will be mandated from 2022;
 - the mutual recognition process for car safety standards focuses directly on comparisons with prescribed crash protection standards which affect the structure of vehicles and injury mitigation in the event of a collision, as well as Advanced Driver Assistance Systems (ADAS) to prevent collisions.

¹ [Department for International Trade \(2019\). UK-US Free Trade Agreement](#)

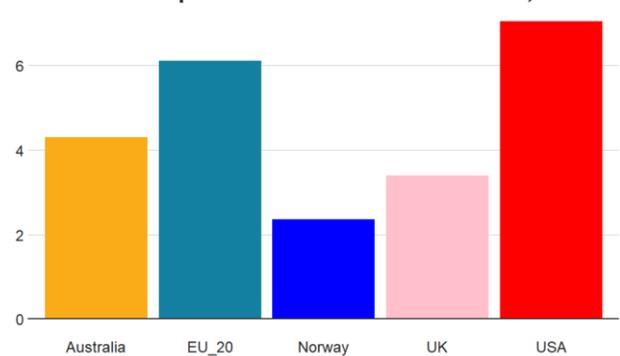
² [Department for International Trade \(20120\). UK-Australia Free Trade Agreement: the UK's strategic approach](#)

The USA and road safety – not a model to copy

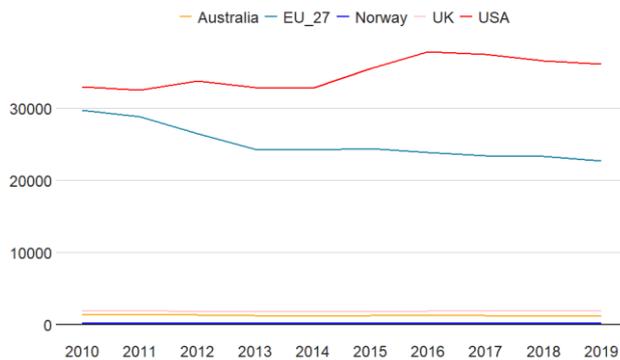
Road deaths per million population, 2010 and 2019



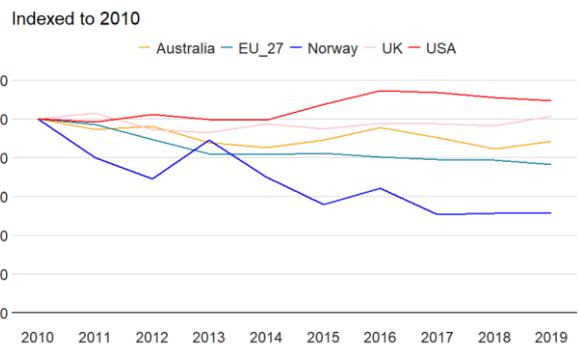
Road deaths per billion vehicle KM travelled, 2018



Road deaths since 2010

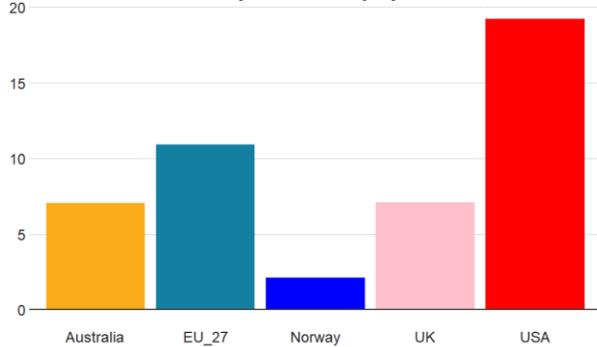


Road deaths since 2010



Particularly bad for pedestrians

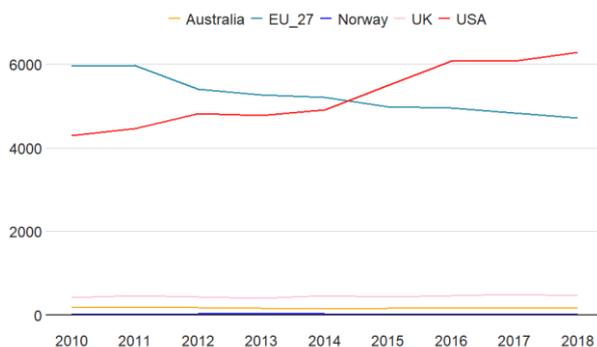
Pedestrian deaths per million population, 2018



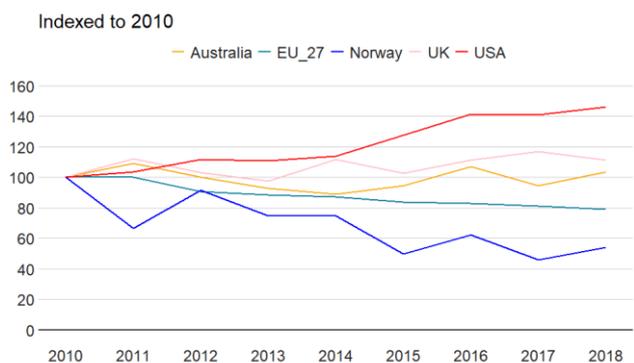
The UK's road safety record may have been disappointing over the past decade but the USA is far worse. Its road death rate by population is *four times* the UK's and getting worse.

US pedestrians are worst affected, with 50% more killed in the past decade.

Pedestrian deaths since 2010



Pedestrian deaths since 2010



The risks to UK road users

- Whether by legislative standards or new car assessment programmes – the key drivers of vehicle safety improvements – UK and US regimes differ. To some extent, these reflect the different types of road network, vehicle fleet and collision in North America and Europe.
- There are also safety concerns for the UK due to the different traffic mix. The number and percentage of SUVs and pick-up trucks is substantially larger in the US than in Europe. The highest-selling vehicle overall in the US since 1981 is the Ford F-Series pick-up truck, currently the F150.³ An expansion of volume in this type of vehicle offers potential risks to drivers and passengers of the smaller car population in the UK. These larger vehicles are also more threatening to cyclists, pedestrians and motorcycle riders.
- Substantial improvements in the safety of new vehicles in the UK and in Europe have resulted from a combination of mandatory EU and UNECE safety requirements for new vehicles, by Euro NCAP (the European New Car Assessment Programme) safety ratings, and by manufacturer initiatives. The experience with pedestrian protection is that consumer information alone is insufficient and also requires a legislative framework.
- Key safety measures introduced in UK/EU legislation affect the structural design of cars for front and side impact protection and pedestrian protection. These are continuously updated in line with technical progress within the EU Whole Vehicle Type Approval Scheme (EUWVTA) which forms the basis of UK whole vehicle type approval.
- Research by UK, Swedish, French and US research organisations show that a typical EU/UK car is 33% safer than a typical US model when it comes to the risk of serious injury in front and side impacts.⁴ The introduction of US vehicles which are allowed to be designed without a regulated safer car front requirement increases risk still further at a time when the UK is actively encouraging walking and cycling. Front bumper testing in the US concerns not safety, but mitigation of repair costs; designs may be detrimental to pedestrian safety.⁵
- As part of the 2016 Transatlantic Trade Investment Partnership (TTIP), the European Commission, supported by TRL, undertook a regulation comparison between the EU and the US.⁶ The analysis highlighted that *“straightforward broad equivalence between EU compliant and US compliant cars cannot be justified in regulatory terms. Crucial safety adaptations to cars will still be necessary to overcome the differences in safety performances that are essential for the EU and US situations on specific aspects.”* It stated that *“A passenger car coming into the EU from the US, complying with all US rules, would for instance always have to be supplemented with at least the EU specific pedestrian safety provisions that would remain to be required.”*⁴

³ https://en.wikipedia.org/wiki/Ford_F-Series

⁴ *Comparing motor-vehicle crash risk of EU and US vehicles (2015)* University of Michigan Transportation Research Institute, Ann Arbor, Michigan; Safer Vehicle and Traffic Safety Centre at Chalmers, Gothenburg, Sweden Centre Europeen d'Études de Sécurité et d'analyse des Risques, Nanterre, France, TRL (Transport Research Laboratory), UK.

⁵ http://trade.ec.europa.eu/doclib/docs/2016/september/tradoc_154981.pdf

- Since this comparison, a range of new measures were recently approved at an EU level while the UK was still a Member of the EU under the revision of the General Safety Regulation and the Pedestrian Safety Regulation.⁷ TRL estimates that these have the potential to save 25,000 deaths and over 140,000 serious injuries in motor vehicle collisions across the EU in the following 16 years, many of these within the UK.⁸ The new regulations open up the gap further between the safety performance of US and EU vehicles, with EU vehicles offering significantly more crash prevention measures and providing further frontal crash protection for pedestrians and cyclists.
- Although Britain is no longer part of the EU, when the above rules came into effect in 2019, the UK Vehicle Certification Agency said that it would mirror these safety standards for vehicles in the UK. This needs to be reconfirmed by the new UK Government. The Society of Motor Manufacturers and Traders (SMMT) has stated that *“reduction of bilateral technical barriers to trade should not result in new obstacles to trade with other key trading partners, lower safety and environmental standards or UK specific technical standards and regulations.”*⁹

Who benefits?

- A UK/US FTA with lower safety standards would almost certainly prove more advantageous to the US automotive sector, enabling it to export its larger style of vehicles, with lower safety standards, to the UK.
- Regardless of a FTA, the US is unlikely to accept UK type-approval for vehicles exported to the US, particularly since the VW emissions scandal. A federal UK/US FTA would not remove the requirement for UK exports to meet US State requirements for vehicle testing.
- The UK automotive sector has aligned itself to high safety standards set by the EU and alignment with EU standards and markets remains a priority for SMMT. Companies such as JLR have been forced to abandon production of traditional models such as the Land Rover Defender as it did not offer modern collision protection standards for occupants or pedestrians. These companies would take a dim view if such vehicles were now to be imported.

⁷ <https://trl.co.uk/news/news/european-parliament-council-and-commission-gives-green-light-general-safety-regulations>

⁸ <https://op.europa.eu/en/web/eu-law-and-publications/publication-detail/-/publication/ed4aff17-49c5-11e8-be1d-01aa75ed71a1>

⁹ [SMMT Position Paper UK-U.S. Trade Negotiations May 2020](#)

Conclusions and recommendations

- A lowering of vehicle safety standards as a result of a UK/US FTA would result in serious and substantial road safety impacts in the UK, for car occupants and for vulnerable road users. In importance to human health, these would almost certainly outweigh some of the safety problems identified in other sectors, such as food and farming.
- There is consensus amongst UK vehicle safety experts that vehicle safety improvements have been the single most important means of preventing and mitigating serious injury in car crashes and the most efficient means of reducing deaths and serious injuries in road collisions. TRL estimated that between 2002 and 2020 the effectiveness of improvements in vehicle crash protection produced an 11% reduction in car driver deaths with a predicted cumulative saving of 1,632 fatalities in Britain.¹⁰ Vehicle safety requires a legislative approach.
- While the UK has made concerted and successful efforts over many years to reduce deaths and serious injuries, progress has stalled. Since 2010 there has been a “plateau” in the number of people killed on UK roads, in contrast to the previous long-term downwards trend. Once a world leader in road safety performance, the figures for 2019 indicate that the UK has fallen to 5th place among European countries in terms of the number of deaths per 100,000 population.¹¹
- **Against this background PACTS calls on the Government to ensure that:**
 - no vehicle is imported to the UK with lower than EU vehicle safety standards;
 - no vehicle is imported to the UK without recently agreed EU vehicle safety standards that will be mandated from 2022;
 - the mutual recognition process for car safety standards focuses directly on comparisons with prescribed crash protection standards which affect the structure of vehicles and injury mitigation in the event of a collision, as well as Advanced Driver Assistance Systems (ADAS) to prevent collisions.

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¹⁰ Cuerden, R, Lloyd L, Wallbank, C, Seidl M (2015). [The potential for vehicle safety standards to prevent road deaths and injuries in Brazil](#), PPR 766, Transport Research Laboratory, Crowthorne.

¹¹ [European Transport Safety Council, 14th Annual Road Safety Performance Index \(PIN\) Report \(June 2020\)](#). (UK figures for 2019 are provisional.)



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