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Consolidated Resolution on Road Traffic (R.E.1)
Amendment proposals on Vulnerable Road Users (VRU)

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Submitted by IMMA

This document, submitted by the International Motorcycle Manufacturers’ Association, provides comments on ECE/TRANS/WP.1/2018/6 concerning policies for powered two wheelers.
REF: IMMA comments on ECE/TRANS/WP.1/2018/6 by the Institute of Road Traffic Engineering (IRTE) and University of Birmingham

IMMA took note of Formal document ECE/TRANS/WP.1/2018/6 on policies for Powered Two Wheelers (PTW) by the experts from IRTE and the University of Birmingham to be tabled at the 77th session of WP.1 (September 2018). As clarified in Informal document No. 4 for 74th WP.1 session the 2018/6 consolidates:

- ECE/TRANS/WP.1/2017/3 introduced at 74/WP.1 (March 2017) addressing PTW safety policies and recommendations for South-East Asian countries and other low and middle income countries.
- Informal document no. 4 introduced at 76/WP.1 (March 2018), addressing issues applicable for other Vulnerable Road Users.

Please find below IMMAs comments on ECE/TRANS/WP.1/2018/6 for consideration by WP.1:

1. The 2018/6 strongly underlines the importance of infrastructure for PTWs but there is a lack of examples of infrastructure solutions. During the PTW round tables in Delhi a number of interesting contributions and practices have been presented which could be included in the document or in an annex, to allow better understanding and provide guidance.

2. With regards to vehicle standards and regulations, the importance of harmonization should be emphasized with reference and promotion of the World Forum for Vehicle Harmonisation WP.29 and its legal Instruments.

3. The 2018/6 recognizes the need for collection of data to use to drive policy. Even though the 2018/6 is considered a policy paper, providing references to data (e.g. in an annex) will support acceptance of the recommendations.

4. The paragraphs on accident data collection and investigation do not refer to globally recognized common methodologies and networks such as those specified by OECD and IRTAD and the need to collect exposure data to detect causation factors. Suggestion to also include references to PTW in-depth crash investigation projects in Europe (MAIDS) and USA (FHWA Crash Study) following these methodologies as a basis.

IMMA greatly appreciated the initiative of WP.1 to address PTW safety through a series of PTW safety roundtables as hosted by IRTE. A network of experts has been established in the region. General issues have been laid out, emphasizing among others, the importance of adequate road infrastructure design and conditions. However, the expansion of scope to include other vulnerable road users in the scope 2018/6 has led to the elaboration of set of relatively high level policy recommendations.

The roundtables have paved a path of opportunity towards further collaborative research and evaluation of best practices of PTW friendly infrastructures in the region. Such guidance material is required for policymakers to improve safety of PTW-users especially in those countries where the fleet of PTW is already high or continues to increase significantly.