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## **Consultation Paper**

### **Respecting the Rules- Better Road Safety Enforcement in the European Union**

#### **1. Do you agree with the definition of the problem and the objectives of the intended EU actions?**

BMIVT agrees that road Safety and halving the number of road deaths by 2010 has to be a top priority in the European Union and the enforcement is an important key to reach this goal. An EU-wide system for cross border enforcement is important and helpful regarding road safety. In view of increasing mobility within the European Union it's important for road users' general acceptance of rules and their sense of responsibility that traffic rules are not limited to their country but also apply abroad. Vice versa it is important for the residents of a country that enforcement measures do also apply to non-resident traffic offenders.

#### **2. Should EU actions be limited to the Trans-European Road Network or cover all EU roads?**

EU action in the field of enforcement should not be limited to the Trans European Road Network, because this does not make sense from a road safety point of view. In most European countries more high risk sites and thus more accidents are on other roads than motorways.

#### **3. Should EU actions be limited to the three main traffic offences responsible for road accidents and deaths, namely speeding, drink-driving and non-use of seat belts, or should they cover all traffic offences?**

All traffic offences should be covered. Still - if necessary - to speed up the process and to have cross-border enforcement in place soon, which would be very desirable, EU action could be limited to the three main traffic offences in a first step and the system could be extended to other offences later on.

#### **4. Which one of the described policy option would have your preference? Do you have any specific comments related to implementation issues?**

As cross border enforcement is necessary and useful "Business as usual" is certainly no option. Generally, Option 5.3 is supported. This option needs the implementation of the framework decision for mutual recognition of financial penalties in all Member States. The other necessary supplementary rules (identification of owners of the vehicles through an information exchange system at EU level) could be included in a separate framework decision. A cost-effective and practicable solution is required for the exchange of owner data.

It has to be considered that all actions must comply with subsidiarity. There should be common topics, common aims, etc., but the question, how aims should be reached, must be a topic for national authorities.

**5. Are there policy options other than those described in this paper that you would like to suggest?**

No.

**6. Do you have specific comments on the costs and benefits of the different instruments / measures?**

It has to be considered that actions in the field of enforcement require a significant number of personnel. Even if the additional traffic surveillance is automatic, compiling the results needs employees for desk work, that are then no longer available for performing surveillance activities.

**7. Is there any other comment you wish to make?**

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