Dear colleagues,

It was not possible for me to reply to this request within 48 hours as set in the email, because I was traveling during this time. Nonetheless, I hope that the comments below would benefit to the drafters of the targets in revising the initial proposal.

Some General comments:

1. The approach of 10% reduction per year does not always suit the defined targets. In fact, as statistical rules teach us, the tendency towards zero occurrence of a phenomenon may be sharp when occurrence of this phenomenon is far from zero until reaching a plateau somewhat above zero. For instance, the number of road traffic fatalities in France, for example, seems to have reached a plateau just slightly under 4000 per year; and it appears very difficult to lower this figure, despite all the efforts and countermeasures taken by the relevant authorities, including to control speed and drink driving which are depending on personality variables and not amenable to full control by the authorities. The most flagrant example of statistical inadequacy of this approach is the target set for the reduction of the time from the occurrence of serious injury to the availability of emergency care provider. In fact, it can’t be reduced indefinitely by 10% annually to ultimately become zero. Instead, it should be thought of and defined in terms of minutes. Thus, all the targets defined in this manner need to be revisited and each one should be reassessed with a future vision of what it really implies with reference to the criteria set in the document as to the necessity of the targets to “be quantifiable and as specific and realistic as possible”.

2. It appears that too much focus is put on legislation while implementation and enforcement are more problematic.

3. It is absolutely necessary that data collection related to the indicators be developed by technical experts in order to assist countries in collecting and reporting data in a standardised manner. Developing countries also need assistance to establish “the baseline against which progress is measured”.

4. Why there are no end-result targets, such as reduction of fatalities and serious injuries, which is the aim of all road traffic safety policies and countermeasures?

5. Why there are no targets concerning child restraint, or distraction and the use of telephone while driving, or road traffic safety education, driver education and the delivery of driving licenses, etc.?

Some Specific Comments:

1. Why there are no targets concerning old vehicles? Such as 100% of vehicles using public roads are fit for circulation according to national standards.

2. The second target concerning infrastructure, i.e. >75% of travel on existing roads are 3 star or better for all road users, is difficult to implement in developing countries, for the lack of information about the baseline and the heavy cost of enhancing the existing road networks to reach 3 star category. Here the reduction by 10% annually approach may be more appropriate.

3. The same could be said concerning reducing speeding: lack of baseline information; difficulty of implementation; the tendency towards zero and the plateau effect.
4. The indicators for lead agency are correct, while the target does not cover both indicators.

Best regards.