Mandating vehicle safety technologies in GB type approval

Your information

Q1. What is your name?
Arthur Gribbin

Q2. What is your email address?
agribbin@logistics.org.uk

Q3. Are you responding on behalf of an organisation?
Yes

Organisation details

Q4. What is the name of your organisation?
Logistics UK

Q5. How many people work for your organisation?
250 to 449 employees

Q6. How would you describe your organisation?
Road safety and advocacy group

Vehicle safety technologies

Q7. Do you support or oppose mandating these vehicle safety technologies in GB type approval?

	Support	Oppose	Neither support nor oppose	Don't know
Advanced distraction warning	X			
Blind spot information systems	X			
Drowsiness and attention warning	X			
Direct vision	X			
Emergency braking for cyclists	X			
Emergency braking for pedestrians	X			
Emergency braking for vehicles	X			
Event data recorder	X			
Emergency lane keeping system	X			
Emergency stop signal	X			
Frontal full-width impact	X			
Frontal off-set impact	X			
Intelligent speed assistance	X			
Moving off information system	X			
Pole side impact	X			
Pedestrian windscreen impact	X			
Reversing motion awareness	X			
Tyre pressure monitoring system	X			

Why?
Logistics UK supports mandating the eighteen listed technologies, which address key collision factors such as speed, distraction, fatigue, blind spots, and loss of control. Many members already utilise these systems voluntarily due to contractual obligations, insurer requirements or safety schemes such as Direct Vision Standard in London and through scheme such as CLOCS (Construction Logistics and Community Safety) and FORS (Fleet Operator Recognition Scheme.)
Systems must perform reliably in GB specific conditions, including narrow rural roads, poor road markings, adverse weather and in turn must be trusted by drivers, supported by clear guidance and supplemented through training.
Some members note that aftermarket systems may offer higher performance or more rapid upgrade cycles than factory fit alternatives. Logistics UK therefore encourage government to ensure compliance pathways remain open to both OEM and certified aftermarket solutions where they meet the required technical standards.

Alcohol interlock installation facilitation

Q8. Do you agree or disagree with our proposal not to mandate AIIF technology at this time?

Agree

Suggested approach

Q10. Do you agree or disagree with mandating these technologies at this time solely for mass-produced vehicles under GB type approval?

Agree

Technical requirements

Q14. Do you support or oppose the proposed technical requirement for:

	Support	Oppose	Neither support nor oppose	Don't know
advanced distraction warning	X			
blind spot information systems	X			
drowsiness and attention warning	X			
direct vision	X			
emergency braking for cyclists	X			
emergency braking for pedestrians	X			
emergency braking for vehicles	X			
event data recorder	X			
emergency lane keeping system	X			
emergency stop signal	X			
frontal full-width impact	X			
frontal off-set impact	X			
intelligent speed assistance	X			
moving off information system	X			
pole side impact	X			
pedestrian windscreen impact	X			
reversing motion awareness	X			
tyre pressure monitoring system	X			

Why?
Logistics UK support the proposed technical requirements, particularly alignment with UNECE regulations and EU GSR2. This avoids GB specific variants, reduces costs and ensures operators retain access to the full range of compliant models.
Some members have raised concerns that factory fitted systems aligned with UNECE/GSR may not fully address GB operational contexts or may show detection limitations that aftermarket systems have already resolved. To avoid constraining innovation, the technical framework should permit the use of aftermarket systems that demonstrably meet or exceed mandated performance standards.
Robust testing must ensure systems reliably distinguish genuine hazards from roadside features. False positives (e.g. AEB activation for overhead structures or ISA misreading temporary signage) undermine safety and driver confidence. Human factors validation is vital to reduce nuisance alerts and alarm fatigue.
Clear guidance is needed for bodybuilders to ensure systems remain functional after conversion, and operators must have straightforward access to safety critical data for incident investigation.

Vehicles built in multiple stage

Q15. Do you agree or disagree with retaining existing provisions for multi-stage builds?

Agree

Special purpose vehicles

Q17. Do you agree or disagree with retaining the current technical requirements for special purpose vehicles?
Agree

Effect of vehicle safety technologies on casualty reduction

Q19. If the safety technologies were mandated for GB type approval what effect, if any, do you believe each technology would have on casualty reduction?

	Very positive	Positive	Neither positive nor negative	Negative	Very negative	Don't know
Advanced distraction warning	X					
Blind spot information systems	X					
Drowsiness and attention warning	X					
Direct vision	X					
Emergency braking for cyclists	X					
Emergency braking for pedestrians	X					
Emergency braking for vehicles	X					
Event data recorder	X					
Emergency lane keeping system	X					
Emergency stop signal	X					
Frontal full-width impact	X					
Frontal off-set impact	X					
Intelligent speed assistance	X					
Moving off information system	X					
Pole side impact	X					
Pedestrian windscreen impact	X					
Reversing motion awareness	X					
Tyre pressure monitoring system	X					

Explain why?
Logistics UK expect mandatory implementation to have a significant positive impact on casualty reduction, although the scale of benefit will vary by technology. AEB offers the greatest potential, with compelling evidence of reductions in rear end collisions and pedestrian fatalities. ISA is also likely to deliver substantial benefits by reducing speed related collisions and improving compliance with speed limits. Driver monitoring systems can help address fatigue and distraction, particularly in HGV and coach operations. Lane keeping systems are expected to reduce run off road and drift related incidents, while vulnerable road user detection systems will be especially valuable in urban environments where HGV blind spot collisions remain a major concern. Other technologies, such as event data recorders and tyre pressure monitoring, offer more indirect or modest casualty benefits but contribute to improved risk management and vehicle maintenance. The combined effect of these technologies operating together is likely to exceed the impact of any single measure.

Other regulations

Q20. What, if any, other domestic regulations, beyond those already specified, do you believe will require amendment to align with these proposals?

Several domestic regulations may require amendment to ensure consistency with the proposed changes. Construction and Use Regulations may need updating to reflect new system functionality and driver warning requirements. Roadworthiness and MOT regulations will need to evolve to incorporate checks on ADAS functionality as systems mature and testing capacity increases. The Highway Code will require updates to explain system capabilities, limitations, and driver responsibilities. The Road Traffic Act may need clarification regarding driver duties when systems intervene, particularly for lane keeping and speed assistance. Data protection frameworks will need to address access to event data recorder information, balancing safety, liability, and privacy considerations. Insurance regulations may also require adjustment to ensure fair and consistent treatment of ADAS related claims.

Implementation timing

Q21. Do you agree or disagree with the proposed timings for implementing these safety technologies?

Agree

Sale of remaining non-compliant vehicle stocks

Q23. Should, in your view, manufacturers be allowed to sell their remaining stocks of non-compliant vehicles for a specified period after introduction of these proposals?

Yes

Maintaining standards

Q25. After implementation if evidence showed that these vehicle safety technologies are not consistently maintained, should we make it mandatory for operators to maintain these technologies?

Yes

Maintaining vehicle safety technologies reasoning

Q26. Why?

Yes, but only with the necessary supporting infrastructure (technical data access, calibration tools, technician training, proportionate enforcement). A review should be commissioned within three years of implementation.

Other considerations

Q27. What, if any, other further measures exist that you wish to highlight regarding these proposals?

Several complementary measures would support the successful implementation of these proposals. A national data access framework is needed to govern the use of event data recorder and ADAS data, balancing safety, liability, and privacy considerations. Driver training and public awareness campaigns will be essential to ensure that drivers understand the capabilities and limitations of new systems. Support for SMEs should be considered, as smaller operators may face disproportionate cost and downtime impacts. Retrofit solutions should be encouraged where feasible, particularly for technologies such as blind spot detection and tyre pressure monitoring. Finally, alignment with Northern Ireland and EU standards should remain a priority to support dual marking and maintain consistency across the UK internal market. Government should ensure a level playing field between OEM and aftermarket safety technologies by permitting compliance through any system factory fit or retrofit that meets the required technical performance specification. This avoids locking in older technologies and supports domestic innovation.

Final comments

Q28. Any other comments?

Logistics UK welcomes the ambition behind these proposals and supports the direction of travel. However, three overarching reflections are important. First, safety requires reliability. Systems must work consistently in GB conditions to maintain public trust and deliver the intended benefits. Second, cost matters. If new vehicles become significantly more expensive, operators may retain older, less safe vehicles for longer, undermining safety objectives. Third, maintenance is critical. A safety system that is fitted but not functioning provides no benefit. A parallel strategy addressing repair capacity, calibration access, and consumer awareness is therefore essential. We welcome continued engagement with the Department for Transport and stand ready to support implementation on behalf of our members.

Logistics UK welcomes the opportunity to respond to the government’s proposals to mandate new vehicle safety technologies in GB Type Approval. We fully support the principle of introducing proven systems that reduce deaths and serious injuries; however, implementation must be practical for operators and affordable for industry.
Our response highlights the need for realistic implementation timelines, technologies that are mature and reliable in real world use, safeguards to keep new vehicles affordable, and clear rules for maintaining these systems throughout their service life. We also emphasise the importance of aligning with EU GSR2 standards to avoid market disruption and ensure operators retain access to the widest choice of compliant vehicles.
While alignment with EU GSR2 remains important for avoiding GB specific variants and maintaining model availability, some members have highlighted the need for flexibility in how safety technologies are integrated into vehicles placed on the GB market. Aftermarket and multistage builders often deliver innovative safety systems that can outperform legacy OEM designs and can be updated more rapidly as technology evolves. The implementation framework should therefore ensure that both OEM integrated and approved aftermarket solutions can play a role where they meet or exceed performance requirements.
Summary:
• Mandating proven safety technologies can deliver meaningful casualty reduction, and Logistics UK supports their adoption where compelling evidence demonstrates real world reductions in collisions, deaths, and serious injuries.
• Implementation must be practical for operators. Technologies should be mature, supply chains prepared, and maintenance and calibration infrastructure ready. Clear and realistic timelines are essential.
• Affordability is critical. Safety improvements must not push new vehicle prices to levels that delay fleet replacement, as extended life cycles undermine safety objectives.
• Alignment with EU GSR2 remains important. Consistency avoids GB specific vehicle variants, maintains model availability, reduces compliance complexity, and supports cross border operations.
• Flexibility in technology pathways is essential. Some members highlight that aftermarket systems and multistage builders may offer more rapid innovation cycles or enhanced performance versus factory fit alternatives. The regulatory framework should therefore enable compliance through OEM or approved aftermarket solutions, provided performance requirements are met.
• Clear rules for maintenance, calibration and data access are required. Safety systems must function reliably throughout the vehicle life cycle, with operators able to access the information and tools needed to maintain them.