

Draft Government proposal to Parliament on an Act amending the Vehicles Act and certain related acts

Impact assessment of the new Section 6b to be added to the Vehicles Act

Impact on road safety

The proposals have an impact on road safety in particular and aim to prevent possible adverse effects on the good level of road safety as a result of technological developments.

Studies have indicated that driver assistance systems commonly in use to date have had a positive impact on road safety. Automatic driving systems are also expected to have positive effects, and this has been confirmed through modelling. However, driver assistance systems—which are set to be rolled out on a large scale in the near future and will transform the driving experience—are an area in which practical experience has so far been limited. These issues give rise to concerns stemming, in particular, from the human tendency to place too much trust in the technical systems in use. The more sophisticated the system, the more likely it is that the driver will be able to trust that the system will always operate correctly. However, driver assistance systems may make errors, which could lead to dangerous situations unless the driver is ready to take control of the vehicle.

Driver assistance systems also provide increased driving comfort. With the expansion of DCAS systems, the driver's perception of driving comfort will continue to increase, as driving no longer requires physical measures. In favourable conditions, the driver's vigilance may wane and their reaction times may slow down. In more demanding conditions, such as precipitation or winter conditions, excessive confidence in system capabilities may increase the risk of accidents. The risk is particularly high in situations where conditions are unclear, such as when certain areas of the road gradually freeze over whilst driving.

Driver assistance systems monitor the driver's focus on the driving task, ensuring, for instance, that their hands are on the steering wheel or within reach, or that their eyes are on the road, or both, and alert the driver if they detect a loss of concentration. Although the driver monitoring system detects physical signs of a lack of engagement, it is unable to assess the driver's cognitive disengagement from the driving task. It is therefore important that drivers continue to focus on their tasks related to driving the vehicle and not, for instance, on using their mobile devices.

Impact on the activities of public authorities

The obligation to be added to the Vehicles Act, which requires that economic operators and dealers promote vehicle users' understanding of the driver's role and the associated duties and responsibilities, represents a new task for the Finnish Transport and Communications Agency's market surveillance activities. It is, however, likely that the need to intervene in the activities of economic operators and retailers under the proposed Section 6b of the Vehicles Act will arise relatively rarely. It is estimated that the additional workload will amount to less than 0.5 person-years. The task also does not require any changes to the information system. The task can be carried out within the framework of existing resources.

Economic impact

The proposals do not entail an increase in the financial or administrative burden on businesses, as they do not, for example, require the production of specific types of materials, but rather that businesses accurately describe the nature and capabilities of the systems installed in vehicles in the materials they produce. In the case of highly sophisticated driver assistance systems, an understanding

of the role of the driver and the related obligations and responsibilities is also in the interest of economic operators and retailers. The proposal aims to provide the authorities with the means to address undesirable practices, which will also promote fair competition in the market.

Impact assessment of the proposed amendment to Section 180(2) of the Vehicles Act

Impact on road safety

Taking into account the electric power train of car brakes would bring national regulation on the repair and modification of ETBS brakes permitted under the EU Regulation and on the coupling of vehicles to each other in line with equivalent regulation for cars fitted with compressed air brakes. In particular, taking ETBS brakes into account in regulation supports the maintenance of road safety in line with technological developments. The amendment ensures that new braking systems are properly regulated and monitored. This will contribute to safety, especially in heavy traffic, as it will be possible to improve the operation of the driver assistance and automatic restraint systems of a vehicle equipped with ETBS brakes beyond the minimum requirements set by the technical level of vehicles equipped with compressed-air brakes.

Impact on the activities of public authorities

The requirement for a licence for ETBS brakes would entail additional work for the Finnish Transport and Communications Agency in processing the applications for authorisation and in administering the authorisations, and in monitoring the repair shops subject to authorisation. However, the additional workload is expected to be minimal, and the resulting extra costs are expected to be covered by the fees charged for the licences.

The safe operation of the brakes is checked during the periodic inspection. New testing equipment is not necessarily required for ETBS brake inspections, but it can help streamline the process, and mandatory regulations in this regard may be introduced under EU legislation in the future.

When new heavy goods vehicles are approved for use on the road, their braking systems must comply with the requirements of ECE Regulation No 13. The requirements for ETBS brakes are set out in the aforementioned E-Regulation. Finland has both designated testing laboratories, as referred to in Section 2(31) of the Vehicles Act, and approved experts, as referred to in Section 69 of the Vehicles Act, who are authorised to issue reports on the conformity of brakes with the requirements of E-Regulation. Technical services and approved experts shall be responsible for their areas of competence, but the competence regarding ETBS brakes shall be taken into account, for instance, in the supervision of technical services.

Economic impact

Including ETBS brakes on heavy goods vehicles in the regulations governing licensed repair shops would not significantly increase the number of licensed repair shops in the near future, as, particularly in the coming years, repair work would mainly be carried out by those workshops that currently repair compressed-air braking systems. At present, workshop licence holders are only required to pay an annual fee, which is EUR 140 in 2026. A separate annual fee would be charged for the ETBS licence, in the same way as, for example, for a licence authorising the calibration of tachographs. Repair shops should not incur any new equipment costs directly related to their repair

shop licence. However, in practice, repair and maintenance operations require tools tailored to the car brand in question, for example, for the analysis of electrical faults. Workshop staff must be trained in the repair of ETBS brakes in general and, in many cases, in the repair of the specific vehicle models handled by the workshop. This proposal would not introduce any new qualification requirements for repair shops.