

Centre for Connected and Autonomous Vehicles
Great Minster House
33 Horseferry Rd
London
SW1P 4DR
United Kingdom



13 October 2022

By email: consultation@ccav.gov.uk

Dear sir/madam,

Connected and automated mobility 2025: realising the benefits of self-driving vehicles

APIL is grateful for the opportunity to respond to the Centre for Connected and Autonomous Vehicles' consultation on the new safety framework for self-driving vehicles. APIL is a not-for-profit organisation representing injured people's rights. One of our aims is to promote better safety standards. As such, our paper is in response to question 2 of the consultation.

We support the need for the law to adapt to technological advancements so that self-driving vehicles are safely used on UK roads. APIL supports the use of new vehicles as long as there are safeguards to ensure that they will reduce death and injury. We believe that automation has the potential to improve road safety in the long term, as driver error is one of the most common causes of road collisions in the UK. We are concerned, however, that the government intends to implement the equivalent standard of behaviour to that expected of human drivers (competent and careful) for autonomous vehicles.

We have submitted in a previous response that the standard of safety for self-driving vehicles should be "overall, safer than the average human driver".¹ We reiterate that this is the most appropriate standard to assess the safety of automated vehicles. We believe that the main objective of the use of self-driving vehicles should be to improve the standard of safety that currently applies to human drivers. If the standard remains the same, there are no guarantees that autonomous vehicles can have a beneficial impact on road safety.

The consultation paper states that the proposed standard would support public trust and acceptance of self-driving vehicles. We believe that setting a higher standard for self-driving vehicles (i.e., safer than the average human driver) would be helpful in demonstrating to the public, who will initially be cautious of the safety of automation, how beneficial automation will be in improving safety for road users. We are concerned that a standard of behaviour equivalent to that expected of human drivers could fail to reduce collisions caused by human error.

¹ Automated Vehicles: Consultation Paper 3 – A response by the Association of Personal Injury Lawyers <https://www.apil.org.uk/files/pdf/ConsultationDocuments/3953.pdf>

We hope that our comments prove useful. If you have any queries about our response, please contact Ana Ramos, Legal Affairs Assistant, at the contact information below, in the first instance.

Yours sincerely,

A handwritten signature in black ink that reads "Ana Ramos". The signature is written in a cursive style with a large initial 'A'.

Ana Ramos

Legal Affairs Assistant

APIL

Ana.ramos@apil.org.uk

0115 943 5401