



Department for Transport

James Bennett
Area Coroner
Coroner's Court
50 Newton Street
Birmingham
B4 6NE

Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR
Tel: 0300 330 3000

Web Site: www.gov.uk/dft

Our Ref: [REDACTED]

15 January 2021

[REDACTED]

Dear Mr Bennett,

Thank you for your report dated 30 September, under paragraph 7, Schedule 5, of the Coroners and Justice Act 2009 and Regulations 28 and 29 of the Coroners (Investigations) Regulations 2013. The report was sent to the Department for Transport (DfT) and to the Driver and Vehicle Standards Agency (DVSA) following the conclusion of your inquest into the death of Mollie Matilda Gifford. I am replying on behalf of the both DVSA and DfT as Head of International Vehicle Standards, which is the lead division on vehicle construction standards.

During the inquest you heard evidence that drivers of large goods vehicles are not afforded an adequate view of pedestrians in close proximity to their vehicle when viewed in the Class V and Class VI mirrors. A forensic collision investigator explained that the use of a camera system could provide a clearer view of pedestrians.

All new vehicle types need to be approved prior to their registration and use on GB roads to demonstrate that they comply with a range of technical construction standards. The requirements for indirect vision are set out in the United Nations Economic Commission for Europe (UNECE) Regulation 46 which permits mirrors or camera-monitor systems (CMS) to be fitted to the vehicle.

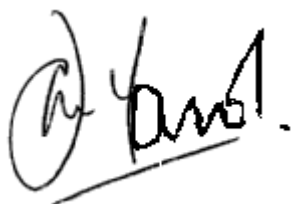
Once a vehicle enters service the relevant regulations are the Road Vehicles (Construction and Use) Regulations 1986 (C & U) which governs the ongoing requirements for the indirect vision devices. C & U includes the option of UNECE Regulation 46 thereby allowing CMS as an alternative to Class V and Class VI mirrors.

The CMS and mirrors permitted under C & U each has benefits in different circumstances. The selection of which system to use is one for the operator to consider, taking account of the nature of their operating environment.

You will be interested to know that the DfT is working at international level to develop appropriate requirements to improve vision for drivers around large goods vehicles. This work includes improved direct vision for the driver through vehicle windows and the windscreen, a moving-off information system to provide a warning to the driver if a vulnerable road user is in front of a vehicle, a blind spot information system to detect cyclists alongside vehicles and provide a warning to the driver, and reversing detection using cameras or sensors.

The requirements for the majority of these improvements should be agreed by global technical experts at the UNECE in April this year, and we anticipate their adoption into international law later in the year. This should ensure that drivers of future designs of vehicles will be better able to identify people in close proximity to their vehicle.

I hope you find this information helpful and are reassured that the Department already permits the use of CMS, as well as being engaged in the development of additional vehicle requirements to improve protection for vulnerable road users.

A handwritten signature in black ink, appearing to read 'A. Y. ...', with a horizontal line underneath.

Head of International Vehicle Standards