

Kommerskollegium Enheten för Handel och Tekniska Regler Diarienummer 2022/01795

Kontaktpersoner Jasmin Saleh, Utredare jasmin.saleh@kommerskollegium.se

Stockholm, 20221130

Concerning the Republic of Slovakia proposal for autonomous distribution vehicles

Lastfordonsgruppen is Sweden's leading professional trailer and body builders' association, with more than 50 member firms, representing Swedish developers and manufacturers of a large variety of advanced bodies and trailers with unique requirement specifications – vehicles and products specially adapted to Swedish conditions.

The writings are very limited. The vehicles concerned by the legislation proposed are limited in volume to 1.7 m3. These overall dimensional limitations describe a very special vehicle. The vehicle is 0.6 m wide and 1.5 m long and brings to mind bicycles, mopeds and motorcycles although an autonomous vehicle may be assumed to have at least 3 wheels.

We feel that it is a large step to propose allow this kind of vehicle in general "road traffic". Such a vehicle will be a very odd and disturbing creature among ordinary vehicles. In addition, it can also be difficult to detect.

Given the size of the vehicle, it would have been expected more restricted introduction. Such a restriction could have been set up if there was a description of what problems the vehicle is supposed to solve.

Delivery vehicle is way too wide and diffuse description to enable a useful restriction to be set up. With a better knowledge of the purpose, it might be possible to limit the areas where the vehicle may be used.

A general opening for this type of special feels unjustified. It seems more relevant that a general opening for autonomous vehicles takes place in the order that has been under development for several years and continues. An important issue in this context is the question of responsibility. Who is responsible when an autonomous vehicle causes a traffic accident? An example of another issue that has to be resolved is which sensor systems must these vehicles have to be able to manoeuvre in "road traffic"? I.e., the issue of autonomous vehicles in general road traffic is complex. This complexity does not go away just that the vehicle is small.

These vehicles can be allowed in limited areas. These areas must be limited against the background of the purpose, the benefits and the risks of accidents.

David Cramér Branschansvarig, Lastfordonsgruppen & Teknikföretagens Branschgrupper David.cramer@tebab.com

LFG – Kansli hos TEBAB, Teknikföretagens Branschgrupper AB