



accidents don't have to happen

RoSPA
28 Calthorpe Road
Birmingham, B15 1RP
United Kingdom
T: +44 (0)121 248 2000
help@rospa.com
www.rospa.com

Patron: Her Majesty The Queen

Pauline Reeves
Road Safety Division
Department for Transport
33 Horseferry Road
London
SW1P 4DR

August 15, 2022

Dear Pauline,

Thank you for your letter dated July 28 2022, notifying The Royal Society for the Prevention of Accidents (RoSPA) of the intention to bring forward an amendment to The Motor Cycles (Protective Helmets) Regulations 1998, to recognise the revised version of UN Regulation 22. This response has been produced following consultation with RoSPA's National Road Safety Committee.

RoSPA supports the proposal to bring forward an amendment to the regulations and to recognise the revised version of UN Regulation 22. RoSPA's support is based on our understanding that the regulation 22.06 provides an equivalent or enhanced level of safety to that of regulation 22.05. In particular, we welcome the following changes:

- A new set of standards that apply specifically to modular helmets being introduced
- Helmet accessories such as integrated sun visors having standards applied that they must meet in order to pass testing.
- Testing procedures being overhauled, with the latest science being applied and impact tests now including higher energy and low speed impacts
- Visor penetration tests and;
- Helmets placed on the market with accessories being examined to check that the equipment has no adverse effect and that the helmet/visor still complies with standards.

For RoSPA, the visor tests are a particularly welcome addition. In a typical year, more than 10,000 motorcyclists are admitted to hospital in England as a result of an accidental injury. NHS clinicians have helped RoSPA estimate that motorcyclists with facial injuries account for approximately 300 of these hospital admissions every year.

We are also supportive of amending The Motor Cycles (Protective Helmets) Regulations 1998, to reference UN Regulation 22.06 but to also permit the previous version of Regulation 22 (UN Regulation 22.05).

RoSPA has no further comments to make on the consultation process, other than to thank the Department for the opportunity to comment. We have no objection to our response being reproduced or attributed.

Yours Sincerely,





accidents don't have to happen

A handwritten signature in black ink, appearing to read "Rebecca Guy".

Rebecca Guy
RoSPA Road Safety Manager, England

RoSPA
28 Calthorpe Road
Birmingham, B15 1RP
United Kingdom
T: +44 (0)121 248 2000
help@rospa.com
www.rospa.com

Patron: Her Majesty The Queen

