

European Cyclists' Federation,
28 Rue Franklin, Brussels,
1000, Belgium

Re: Public consultations <http://strategy.bg/PublicConsultations/View.aspx?lang=bg-BG&Id=4768> for consideration of mandating the use of bicycle helmets

Dear Ms Kroumova, and Mr Ranovski, Mr Lazarov, Mr Hubchev

I contact you in order to register our support for the Bulgarian cycling organisation "VeloLobby Bulgaria" with regards to their opinions on the current proposals regarding cycling and the update of the Bulgarian traffic code. We welcome the wish to make cyclists safer on Bulgarian roads and appreciate Bulgaria's road authorities attention to make cycling safer, however we are concerned with the possibility that Bulgarian authorities are considering bringing mandatory bicycle helmet legislation to Bulgaria.

Cyclists typically live longer and healthier lives; serious head injuries are rare and the evidence in favour of helmet wearing and helmet laws is weak. The main effect of helmet laws has not been to improve cyclists' safety but to discourage cycling, undermining its health, environmental, and social benefits.

Every effort should be made to promote and encourage cycling for many reasons including

- Increased cycling brings huge benefits to public health, the health benefits of cycling greatly outweigh the risks¹.
- Increased cycling decreases CO₂ levels within road transport, the largest CO₂ producing sector².
- Increased cycling decreases air pollution levels³.
- An increase in cycling can decrease levels of congestion and make cities more liveable⁴

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC2920084/>

² <https://thepep.unece.org/sites/default/files/2017-06/Potential%20of%20Cycling%20to%20Reduce%20Emissions%20in%20Road%20Transport%20-%20Umweltbundesamt.pdf> and http://www.mobile2020.eu/fileadmin/mainpage/downloads/co2tool/CO2_mobile2020.pdf

³ https://ecf.com/files/150119-Cycling-and-Urban-Air-Quality-A-study-of-European-Experiences_web.pdf

⁴ <http://h2020-flow.eu/>



Cycling contributes greatly to the EU economy with an estimated 150 billion⁵. In the Netherlands, the health benefits of cycling amount to a contribution of around 3% of Dutch GDP⁶

Bicycle Helmet Legislation

Europe is often seen as leading the world in cycling and has very few enforced helmet legislation regimes; we believe that this is not a coincidence. Those countries and cities that have managed to achieve good levels of cycling have done it without resorting to helmets. In fact, we believe that it is *because of* the lack of mandatory legislation within these cities that has allowed cycling, and the associated benefits, to grow. All of these examples have also seen an increase in cycling road safety as their cycling numbers have grown (the safety in numbers principle).

ECF works to actively promote cycling and road safety, we oppose any mandatory helmet law because:

- Mandatory helmet laws discourage cycling by portraying it as abnormally dangerous, although evidence shows that you are less likely to be killed in a mile of cycling than in a mile of walking (Wardlaw 2002⁷).
- Bicycle helmets are only designed to withstand minor knocks and bumps, not being hit by motor vehicles, this is acknowledged by manufacturers.
- It has been shown that a tiny reduction in cycling numbers of just 1-2% can have a large public health disbenefit with regards to the loss of the health benefits of cycling compared to any preventative measures that helmets could offer (de Jong 2012⁸).
- Studies show that countries that promote cycling and that have many cycling commuters, experience "safety in numbers" (the larger the number of cyclists – the safer it is for each individual cyclist). Reduced cycling through mandatory helmet legislation can thus increase the risk of injury to remaining cyclists (Jacobsen 2003⁹).
- Countries that have introduced mandatory helmet laws (Australia, New Zealand, Canada) have had at best minimal success rates in reducing head injury rates despite legislation (Robinson 1996;¹⁰ Dennis et al (2013),¹¹ Cameron, Heiman and Neiger, 1992¹²; Smith and Milthorpe, 1993¹³;). These countries have also commonly seen a reduction in cycling numbers of 20-60%¹⁴.

We would urge you not to confuse electric scooters and bicycles, they are different vehicles with different needs. Bicycles are an active mode of transport that have huge possibilities for improving public health, they are not overly dangerous and will bring a health benefit to the

⁵ <https://ecf.com/what-we-do/cycling-economy/economic-benefits>

⁶ https://www.researchgate.net/publication/280316427_Dutch_Cycling_Quantifying_the_Health_and_Related_Economic_Benefits

⁷ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC117837/>

⁸ <https://www.ncbi.nlm.nih.gov/pubmed/22462680>

⁹ <https://injuryprevention.bmj.com/content/9/3/205>

¹⁰ <https://www.sciencedirect.com/science/article/abs/pii/S0001457596000164>

¹¹ <https://www.bmj.com/content/346/bmj.f2674>

¹² <https://www.monash.edu/muarc/archive/our-publications/reports/muarc032>

¹³ <https://www.ncbi.nlm.nih.gov/pubmed/8870773>

¹⁴ <http://www.cycle-helmets.com/cycling-1985-2011.html>



user. EScooters are currently an unknown mode of transport with regards to their safety, the crash risks are unknown and the benefits are unknown, we would urge you to make sure there is a clear separation when analysing the benefits and costs of these two modes of transport and not to conflate the crash risks of one onto the other.

Better safety measures

We call upon Bulgarian road authorities to focus on well-established measures to promote cycling and cyclists' well-being, for example;

- Reducing speed – this is one of the best ways of reducing cycling (and other road user) casualties. Excessive speed is a *direct* factor in about a fifth of all collisions and is a major contributory factor in a third of all road deaths. It has been estimated that a 10% reduction in the mean speed of traffic will result in a *37.8% reduction of the number of fatalities* (Elvik, R et al (2004)¹⁵. To put this in perspective it was estimated that a 10% reduction in “Exposure to darkness” and “Drink-driving” gives a reduction in fatalities of 1.7% and 1.0% respectively.
- Separate infrastructure – Where speed or volume of traffic cannot be reduced cyclists should be physically separated from motorised traffic. There are many good examples of infrastructure design from around the world, from countries such as the Netherlands, Denmark, and Germany amongst others¹⁶.

We therefore call upon the Bulgarian Ministry of Interior Affairs Administration, to increase cycling and to provide a safer environment for them without resorting to counterproductive activities such as helmet legislation and restrictions. We would be very happy to send to you or confirm any of the research mentioned here or elsewhere, do not hesitate to contact ECF at c.woolsgrove@ecf.com if you require any more information.

ECF factsheet on bicycle helmets legislation https://ecf.com/sites/ecf.com/files/Helmet-factsheet-17042015_Final.pdf



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¹⁵ <https://www.toi.no/getfile.php?mmfileid=13206>

¹⁶ PRESTO [https://www.cyclemanual.ie/glossary/Cycling guides](https://www.cyclemanual.ie/glossary/Cycling%20guides): <https://www.crow.nl/publicaties/design-manual-for-bicycle-traffic> and <https://cyclingsolutions.info/> and, <https://cyclehighways.eu/> and https://bicycleinfrastructuremanuals.com/manuals/1/Collection-of-Cycle-Concepts-2012_Denmark.pdf and <https://ec.europa.eu/energy/intelligent/projects/en/projects/presto>

