

ECF European Cyclists' Federation

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Mr. Valentin Radev

Bulgarian Ministry of Interior Affairs,
XXXXXXXXXXXXXXXXXXXX

Brussels, 03 May 2018

Re: Bulgaria consideration of mandating the use of bicycle helmets and hi-visibility jackets

Dear Sir,

I contact you in order to register our support for with regards to their opinions on the current proposals regarding cycling and the update of the Bulgarian traffic code. In particular we are predominantly concerned with the possibility that the code will bring mandatory helmet and hi-vis jacket legislation to Bulgaria.

Please find here the official position of the European Cyclists' Federation on helmets and helmet laws.

"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 and other benefits."

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

- Increased cycling decreases CO2 levels within transport, the largest CO2 producing sector
- Increased cycling decreases air pollution levels
- Increased cycling bring huge benefits to public health, it has also been calculated that the health benefits of cycling outweigh the risks by 20:1
- An increase in cycling can decrease levels of congestion and make cities more liveable

Bicycle helmets do little to improve safety. The best way to improve cyclists' safety is to promote cycling. Countries that have introduced mandatory helmet laws (Australia, New Zealand, Canada) have failed to reduce head injury rates despite legislation (Cameron, Heiman and Neiger, 1992; Smith and Milthorpe, 1993; Scuffham and Langley, 1997). These countries have also commonly seen a reduction in cycling numbers of 20-60%.

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 (Denmark, Ferrara, Germany, Netherlands,

Sevilla, Padova amongst many others) 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).

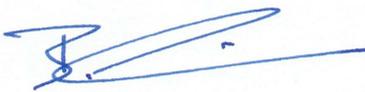
ECF and its members including the Bulgarian Cycling Association promotes cycling and road safety, we oppose any mandatory helmet law because:

- 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 2002).
- Injured cyclists are less likely to have head injuries than injured pedestrians or car occupants (ONISR 2005).
- 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 2012).
- 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 2003).

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 or other clothing legislation and restrictions.

Yours Sincerely,

Dr Bernhard Ensink



Secretary General
European Cyclists' Federation