

Date: 20th November 2021

To
The Joint Secretary
MVL, Transport and Toll
Ministry of Road Transport and Highways (MoRTH)
Transport Bhawan, Parliament Street
New Delhi 110 001

Sub: Submission of suggestions to the draft rules MoRTH GSR 758 (E) on Safety Standards for Children on a Motorised Two Wheeler (MTW), notified by the Ministry of Road and Highways, dated 21st of October 2021

Dear Sir,

Road Safety Network (RSN) would like to congratulate the Ministry of Road Transport and Highways (MoRTH) for taking the initiative with regards to the safety of children and publishing the draft rules MoRTH GSR 758 (E) on Safety Standards for Children on a MTW.

This is a very crucial and sensitive topic which can have larger implications once implemented. We welcome the draft rules on Safety Standards for Children on a motorised two wheeler (MTW) that address the safety of child of the age group of 0 to 4 years. However, we feel that the rule-making process should not be done in a hasty manner as almost all aspects of the design of the safety equipment need research and methods of implementation need deliberation, given the role of motorized two-wheelers in the Indian context.

We also thank you for inviting objections and suggestions on the draft rules. We have carried out a consultative process of gathering inputs and suggestions from the experts, business communities, schools, parents, civil society organisations and NGOs.

We are submitting the inputs and suggestions gathered through this consultative process to the MoRTH. The inputs and suggestions to the draft rules are enclosed herewith for the consideration of the ministry.

Please acknowledge the receipt of this submission.

We will further like to support the ministry in carrying out such consultative processes. We will be glad to support the ministry through any other medium in order to improve road safety in India.

Yours sincerely,

Amarnath Karan

On Behalf of the Road Safety Network

Road Safety Network (RSN) is a group of civil society organizations coming together for improvement of road safety in India and advocating for evidence-based, data-driven participatory decision making and governance of the sector.

Enclosure: Suggestions on the Draft Rules for Safety Standards of Children on a MTW