ADS IWG Working Document
Change Proposal Form
One major comment per form
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Document Reference	ADS-17-20/Rev.1	Date	4 December 2025
Agenda item	5.1.	Outcome	Adopted

Proposed by (affiliation only—no personal information)

GRVA ADS Workshops

Summary of Change (25 words or less)

Deletion of statistics cited in the cost-benefit analysis.

Reason for Change (Justification)

The statistics do not cite the sources of the data to enable interpretation.

Location (e.g., paragraph, chapter, annex, appendix)

Original text

85. Empirical data from ADS demonstration zones and research institutions worldwide highlight the potential benefits and challenges of ADS technology across diverse traffic environments. Statistical analyses of passenger vehicles indicate that accident rates in ADS modes are consistently lower than in manual driving. According to the data shared by the GRVA experts, there is an average of 18.5 accidents per million kilometres in manual driving (10.2 at-fault accidents), compared to 7.1 accidents in automated driving (2.8 at-fault accidents). Notably, some leading technology providers have achieved zero at-fault accidents per million kilometres in automated mode.

86. However, according to the data shared by the GRVA experts, challenges to traffic efficiency persist, particularly during peak hours or in complex scenarios. Studies suggest automated vehicles may experience a 5-15 per cent reduction in average speed compared to human drivers, primarily due to conservative following distance decisions, suboptimal route planning, and delayed responses to dynamic environments. For example, pilot projects in multiple urban areas reported peak-hour automated vehicle speeds of 22–28 km/h, 10-18 per cent lower than manual driving, with travel times increasing by 8-12 per cent on average.

Revised text

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