



Public consultation on " Road infrastructure safety management on the trans-European networks" .

Position of the European Transport Safety Council (ETSC)

GENERAL COMMENT

The European Transport Safety Council welcomes the consultation on " Road infrastructure safety management on the trans-European networks" . A safe, sustainable and efficient transport system is essential for the European Union and its economic and social development.

When the European Commission adopted its 3rd Road Safety Action Programme in 2003 (2003-2010) to halve the number of road accident victims in the European Union by 2010, it also committed to carry out a Mid-term Review in 2005 and to propose legislation if there was no drop in the number of deaths. However this Review was delayed and has not included any legislative proposal to the disappointment of road safety stakeholders, including ETSC.

Given the short time available until 2010, ETSC would urge the European Commission to swiftly adopt the proposed legislation on infrastructure safety.

Facts and figures of road safety in Europe

The 3rd Road Safety Action Programme promises to reduce by half the number of road deaths by 2010. This means a reduction of 25,000 at least of total deaths in the EU25 out of the 50,000 lives taken every year in road accidents.

Road transport remains the main cause of death among all EU citizens under the age of 45. It kills around 115 persons every day, the equivalent of a medium-sized plane accident with no survivors. The costs of road accidents are estimated to be euros 180 billion.

Despite some laudable isolated national achievements, EU road safety policy is far from a success story and the gap between the best- and the worst-



performing Member States is widening. The Commission estimates that, in 2005, approximately 41,600 people were killed on European roads, which means a reduction of only 17.5% since 2001, some way off the 25% needed for the EU to be on course to achieve the target of halving road deaths by 2010.

The risk of death on EU roads is substantially higher for vulnerable road users (8-9 times higher for pedestrians and cyclists). The statistics for motorcyclists are also particularly worrying. If the actual trend continues, in 2010 one out of three road deaths might be a motorcyclist instead of one out of six today.

The average death risk in the Southern, Central and Eastern European countries (the "SEC Belt countries") is about three times higher than the EU average. Deaths continue to rise in certain Member States already at the bottom end of the table, such as Poland, Lithuania, Portugal, Estonia and Hungary.

The Mid-term Review, monitors national targets and measures implemented, and will only deliver its results if the analysis is also followed by action, including legislative if necessary. But there was no legislation proposal accompanying the Mid-term Review. The 3rd Road Safety Action Programme also failed to introduce a timescale for actions and a clear indication of which actions will deliver what kind of results. The Commission has now only four years to translate good intentions on paper into successful interventions on the road.

SPECIFIC COMMENTS ON THE CONSULTATION ON "ROAD INFRASTRUCTURE SAFETY MANAGEMENT ON THE TRANS-EUROPEAN NETWORKS"

Besides the vehicle and the driver, infrastructure is the third pillar of any comprehensive road safety work. ETSC believes that road infrastructure improvements can make a significant contribution towards reducing the frequency and seriousness of road traffic accidents. Configuration of the road is thought to play a role in as many as one in three accidents.

In July 1996, a decision by the Council of Ministers and the European Parliament authorised the European Commission to propose guidelines such that the trans-European road network (TERN) should "guarantee users a high, uniform and continuous level of services, comfort and safety". This



legal obligation, together with the considerable growth in international transport in recent years, makes it necessary to improve the safety of the trans-European road network. The European Commission, in its 3rd Road Safety Action Programme, has also committed to propose a framework Directive on road infrastructure safety.

ETSC believes it is high time for the EU to come forward with an infrastructure safety Directive that really deserves its name. Safety must be considered in its own right in the context of work on road infrastructure, independent from economic and environmental analysis.

1. Analysis of the proposed infrastructure measures

ETSC welcomes the proposal for a Directive on road infrastructure safety management, with its stated aim of helping providers of road infrastructure to avoid unnecessary risks in the road network. ETSC also agrees with the European Commission on the four measures/instruments proposed in order to improve road safety on the trans-European network: road safety impact assessment, road safety audit, network safety management and safety inspections.

Road safety impact assessment

Road safety impact assessment (conducted before the alignment is decided) designates a comparative scenario analysis of the impact that different variants of alignment or interconnection points of new roads or a substantial modification to the existing network will have on the safety performance of the adjacent road network.

ETSC believes that being able to estimate explicitly the impact on road safety that results from building new roads or making substantial modifications to the existing road infrastructure that alter the capacity of the road network in a certain geographic area is of crucial importance if road safety is not to suffer unintentionally from such changes. The same applies to other schemes and developments that have substantial effects on the pattern of road traffic. The results of safety impact assessment should be considered in the planning process alongside other information relevant to decision-making about which schemes should be implemented, and thus improve the quality of such decision-making.

Road safety audit



Road safety audit is a formal procedure for independent assessment of the accident potential and likely safety performance of a specific design for a road or traffic scheme - whether new construction or an alteration to an existing road.

ETSC would like to stress that there is sufficient evidence to warrant the EU and Member States taking measures leading to routine application of safety audits to schemes for new road construction and modification of existing roads. Regarding the costs of such audits, experience has shown that the saving of only one injury accident will more than repay these costs, even if both the audit and any subsequent redesign are taken into account.

Network safety management

Network safety management is intended to reduce further accidents and deaths on the road network in operation by targeting remedial treatment to sections of the road network where accident cost reduction potential is highest.

ETSC believes that effective network safety management requires a shift of emphasis from treatment of symptoms, driven primarily by information about the occurrence of accidents, towards treatment of sources of risk within the road infrastructure by defining, applying and monitoring standards of design, construction and operation.

However, in Member States where death and injury rates are the highest, often because the road authorities have hitherto had the least opportunity and resources to manage the safety of their networks systematically, the most effective and cost-effective way of adapting the road infrastructure to reduce death and injury in the short run is through the management of high risk sites – like road junctions or short sections of road where accidents persistently cluster, or sections of route or neighbourhoods where the local density of accidents is persistently and markedly higher than average. Persistence of high accident occurrence at a site largely eliminates the possibility that this is happening by chance, and provides strong *prima facie* evidence of local shortcomings in the infrastructure. Examination of any such site and basic information about accidents occurring there often readily reveals infrastructure problems that can be corrected quickly and at affordable cost. Death and injury can then also be reduced quickly and affordably.



A prerequisite for effective management of high risk sites – and indeed for network safety management – is basic information about accidents: for each injury accident, just where it happened, and a limited set of information (information that it is realistic to expect to be recorded reliably) relevant to the possible role of local road infrastructure features as contributory factors. The Directive should seek to achieve this on a reasonably consistent basis across the EU.

Safety inspections

Safety inspections designate a periodical review of a road network in operation by trained experts from a safety point of view. Road safety inspections allow the implementation of remedial measures before accidents occur.

At present, a host of different methods on how to conduct road safety inspections exist throughout Europe. ETSC urges the Commission to harmonise these approaches and to find a common definition of how road safety inspections should be established at the European level.

2. Policy options

The European Commission proposes three different policy options in the field of infrastructure safety management. The first one is the simple exchange of best practice; the second one is legislation requiring the adoption of guidelines on infrastructure safety management, leaving the details of their implementation to Member States; the third one is stringent Community legislation aimed at introducing defined and harmonised common infrastructure safety management standards in the Member states.

ETSC strongly agrees with the European Commission on the clear disadvantages of the first option: the exchange of best practice is not enough to guarantee appreciable results towards the objective of higher road infrastructure safety.

However, ETSC does not agree with the Commission stance on the advantages of the second option. ETSC believes that this option could be valuable and have clear returns in countries that already have good levels of road safety and that have already made important steps forward in terms of road infrastructure improvements. The adoption of this second option



would, in the opinion of ETSC, be more problematic in countries with lower levels of road infrastructure safety.

These countries would very much benefit from the third option, i.e. the adoption of stringent legislation on harmonised common infrastructure safety management standards in the Member states. At the same time, the third option would not be problematic for the countries with higher levels of road safety.

Adopting the second option would have limited effectiveness in accelerating progress on road infrastructure safety beyond what national governments are already committed to, or likely to commit themselves to without any EU level initiative.

More than sharing responsibility, Member States and the European Commission should "take" their responsibilities in infrastructure safety. The development of guidelines on implementing best practice by Member States should not replace the need for stringent EU legislation on the matter, but should instead represent a step towards concise legislation at EU level.

3. Additional measures

The Commission intends to table legislation on road infrastructure safety management on the trans-European network.

ETSC believes, however, that the Commission should also consider safety impact assessment, safety audits, network safety management and safety inspections to be a condition for all EU-funded infrastructure and not just apply to the trans-European networks which are limited in extension and already relatively safe.

Finally, ETSC would like to encourage the Commission to develop best practice guidelines in the fields of urban safety management and speed reduction techniques.