



Public consultation on the Report from the High Level Group on the " Extension of the major trans-European transport axes to the neighbouring countries and regions" .

## Position of the European Transport Safety Council (ETSC)

### General comment

The European Transport Safety Council welcomes the High Level Group's Report on the " Extension of the major trans-European transport axes to the neighbouring countries and regions" .

A safe, sustainable and efficient transport system connecting the EU and the neighbouring countries is essential for the European continent and its economic and social development.

ETSC agrees with the Group's conclusion on the need for further studies and analyses, particularly concerning the economic viability, technical specification, environmental impact and financing mechanisms, before the projects can be considered for implementation. ETSC would like to stress, however, that safety considerations should also play a role in these decisions.

This ETSC response will focus prominently on the actions that need to be taken to improve transport safety in the process of extending the trans-European axes to the neighbouring countries.

### Maritime safety

Although marine transport has a relatively low death and injury rate, the consequences of a bad accident happening are very real and sometimes far reaching. The consequences of oil pollution on local flora and fauna, a holiday beach, or on a local fishing community, can be severe. And if there is ever a large loss of life in a passenger carrying vessel, the repercussions can reverberate for many years and take their toll on businesses, small economies and even governments.



ETSC warmly welcomes the Report's intention to launch and develop new shipping routes with the aim to shift freight from road to sea while, at the same time, improving the level of maritime safety in the different regions affected by the extension of the major trans-European transport axes.

ETSC believes that maritime safety in the area should be uniform and harmonised at the highest level of performance. ETSC can share the Report's conclusion that a particularly important role should be played by maritime accident and incident investigation, given that there are currently no consistent procedures and practices for accident investigations in the EU and the neighbouring countries.

Shipping, especially along the motorways of the sea, is international with ownership, management, manning, chartering and voyaging embracing interests from many different nations. Flag states around the world can be very protective and one of the driving forces that underpins the entire sector is the need to make a profit. There are too many ships afloat today where safety standards have been sacrificed for economic reasons. This manifests itself in the physical condition of some ships, the competence of some crews, the manning levels and the working conditions of those on board. Very often these factors ensure the ships involved have much lower operating costs than their more conscientious counterparts and ensure they can undercut the better run vessel. This in turn is a disincentive to invest in quality ships and well-trained crews. When such a sub standard vessel becomes involved in an accident, the effective accident investigator can expose all these flaws in a way that no one else can. It is therefore essential that all serious accidents and incidents are thoroughly investigated.

Unlike other modes of transport, the marine sector is extremely reluctant to embrace the tools necessary for effective accident investigation, often on economic grounds. Few ships are equipped with voyage data recorders and these rarely record more than a few parameters, such as the course steered. ETSC recommends that the EU takes the lead in requiring the mandatory fitting of voyage data recorders in all vessels. There is also a strong case for the EU to require all Member States to establish arrangements for independent marine accident investigation (based on IMO rules) and to report the results. Neighbouring countries should be actively encouraged to follow similar procedures. Finally, accident investigations should not be carried out with the scope of apportioning blame or liability but should rather be aimed at learning lessons and preventing new casualties from occurring.



## Railway safety

Railway systems have, in general, a very good safety record but, since accidents do occur from time to time, it is important that the extension of the trans-European transport axes to the neighbouring countries takes potential safety problems into account.

To date, rail operations on conventional lines have been largely national. Across borders, the operational rules differ very much from country to country. The signal systems as well as the automatic train protection systems are also different from one country to the next. This might seem odd since "international" rail traffic has existed for a long time. This is managed by changing engineers and locomotives at the borders. With this in mind, the European Commission has lately taken steps to harmonise the rules in Member States by developing specifications aimed at overcoming technical and organisational obstacles and at ensuring interoperable rail systems.

ETSC agrees with the High Level Group that effective and efficient rail freight traffic between the EU and the neighbouring countries is of great importance to sustainable economic development and integration. ETSC also recognises the importance of guaranteeing technical and organisational interoperability on the main transnational axes identified by the Group. ETSC, however, believes that railway safety in the area should be uniform and harmonised at the highest level of performance. Interoperability should guarantee that safety levels along the axes are at least as good as the ones currently achieved in the European Union.

## Inland waterway safety

ETSC welcomes the Report's intention to promote the development of inland waterways as this mode of transport is energy efficient and can also ensure a high degree of safety.

Inland waterway transport should be particularly considered when transporting dangerous goods. However, its role in decongesting the overloaded road network, thus ensuring higher levels of safety on the roads, should not be neglected.

Finally, ETSC believes that safety standards in all the EU and neighbouring countries should be harmonised to the highest level and that ensuring



interoperability between the EU River Information Services (RIS) and the traffic information systems of the neighbouring countries represents a step in the right direction.

## Road safety

ETSC warmly welcomes the Report's emphasis on the importance for the EU cooperation programmes to give special attention to road safety concerns in the national transport plans of the neighbouring countries.

The support value of best practice exchange with the neighbouring countries in the framework of the annual Verona Conference on road safety should also be stressed.

Finally, ETSC believes that it is of the utmost importance that the European Union achieves its Transport White Paper objective of moving road transport to safer modes. In the meantime, however, the EU should ensure that European roads become safer by addressing the three main pillars of infrastructure, behaviour and vehicle safety.

### Infrastructure

ETSC strongly supports the Report's intent to systematically address the importance of infrastructure safety.

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.

The extension of the major trans-European transport axes to the neighbouring countries and regions provides an opportunity for the EU to promote road safety audits and road safety impact assessment. 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 Third Road Safety Action Programme, has also committed to propose a framework Directive on



road infrastructure safety. This would introduce, inter alia, compulsory road safety audits for roads on the trans-European road network.

ETSC believes it is high time for the EU to come forward with an infrastructure safety Directive that really deserves its name. The infrastructure safety Directive should require Member States to carry out safety audits and safety impact assessments on all EU-funded infrastructure. There is sufficient evidence to warrant measures leading to routine application of safety audits to the trans-European transport axes. 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.

The infrastructure Directive should also include guidelines in the fields of low cost measures for the treatment of high risk sites and of periodic road safety inspections. Member states and neighbouring countries should be actively encouraged to make use of these best practices guidelines.

### Behaviour

ETSC welcomes the Report's call for countries to give attention to the enforcement of existing legislation as well as to the education and training of drivers.

If properly implemented at national level, police enforcement could help to avoid 14,000 fatalities until 2010 in the EU alone. There is, however, increasing evidence from different Member States that non-resident drivers flout traffic laws when travelling abroad as they do not fear punishment. The implications are twofold: firstly, their dangerous behaviour can lead to road accidents, and secondly this raises criticism in the country they are travelling as Police are not always able to fairly apply the sanctions.

In an increasingly mobile, integrated and enlarged Europe, non-resident drivers make up more of the traffic flow. This is particularly so in transit countries and on the new trans-European transport axes. Legislation proposing a workable EU wide approach (coupled with efficient co-operation agreements with the neighbouring countries) is needed in order to ensure that drivers respect traffic law in whichever country they are driving. This should enable Member States to follow up offences including both financial penalties and driving restrictions such as bans. There is a clear value added case for EU action. Moreover, key transit Members States, as



well as enforcement authorities, would welcome European wide action in this area.

Initial and continuous training of commercial drivers is also important for guaranteeing a high level of safety on the new axes. What is at stake is crucial since it is a question of reversing the current situation: at present in the EU no more than 10% of commercial drivers have received training beyond what is required for obtaining their driving licences. Improving the quantity and quality of training in the EU and the neighbouring countries would help to raise the level of road safety, stationary safety and the quality of service, help drivers taking up the occupation and remedy distortions of competition in this area.

### Vehicle

ETSC welcomes the Report's call for vehicle controls both through periodic roadworthiness tests and, for commercial vehicles, technical roadside inspections.

ETSC believes, however, that the EU should be bolder in its action and further develop and introduce technologies with high life-saving potential such as alcohol interlocks, seat-belt reminders and Intelligent Speed Adaptation (ISA). These Intelligent Transport Systems (ITS) have an important role to play in securing compliance with key traffic rules and could make a strong contribution to encouraging safer behaviour on the road.

In the shorter term, the EU should also come forward with legislation on Daytime Running Lights (DRL). A meta-analysis of the effects of daytime running lights in cars (ETSC, 2003) has shown that this measure could significantly improve safety on European roads. The Commission should give early consideration to a mandatory fitment requirement of daytime running lights to all motorised road vehicles and encourage the neighbouring countries to mandate their use on all the trans-European transport axes.

### Air safety

Europe is involved in one third of worldwide activity but accounts for one tenth of the casualties. However, global accident trends and traffic forecasts indicate that there is no room for complacency and concerted action is now necessary if current safety levels are, at least, to be maintained.



The increasing exposure to the risk of accident and injury in air travel and the prospect of larger numbers of passengers being lost in increasingly larger aircrafts can only lead to the lowering of current public confidence in air safety unless concerted action is taken now.

ETSC welcomes the Report's recognition that efforts should be made to develop future air traffic management systems which ensure the highest levels of safety, particularly in a context of rapid traffic growth. The recommendation to associate neighbouring countries in the development of the Single European Sky is also an important step forward. Finally, ETSC believes that the EU should continue to support research and development in a new generation of air traffic management systems through the SESAR project aiming to replace the different national systems with a harmonised "European system".