



Conférence Européenne
des Directeurs des Routes
Conference of European
Directors of Roads

Position paper on Road Infrastructure Safety Management and Tunnel Safety

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Disclaimer

CEDR's communication is based on the clear understanding that the Member States' respective governments, and not CEDR itself, are the official channel for dealing with the EU. However, the purpose of CEDR is to allow the National Road Authorities to exchange ideas and cooperate at European level.

This document expresses the current position of CEDR. It does not necessarily represent the views of individual member countries and should not be considered the official position of member countries"

1. Introduction and context

Road Safety is a key priority for CEDR members. National Road Authorities (NRA's) continue to cooperate on approaches to reduce the number of fatalities, injuries and the effects of incidents/accidents. In 2016, CEDR published its position paper '**Main Road Safety Challenges for European Road Directors**¹'. This listed the four main challenges as (1) improve safety of the existing road infrastructure (2) speeds in harmony with road infrastructure (3) improve safety of vulnerable road users, and (4) evaluation and deployment of intelligent transport systems. CEDR's Working Group on Road Safety comprises active members from more than 20 countries addressing these challenges and providing recommendations to the national road directors.

This Position Paper has been prepared to inform National Ministries of the views of CEDR members in the revision of two Directives directly related to road infrastructure safety and share CEDR's Action Plan activities for improving road safety performance on Europe's roads.

Through the Regulatory Fitness and Performance Programme (REFIT) and Commission Work Programme 2017², DG MOVE has initiated an evaluation of **Directive 2004/54/EC** of the European Parliament and of the Council of 29 April 2004 on **minimum safety requirements for tunnels in the Trans-European Road Network**. DG MOVE has reported plans to 'retire' the Tunnel Safety Directive under the REFIT process of removing 'unnecessary' legislation on the basis that the core text of the Directive has been implemented in Member State law. However, DG MOVE still wants to retain the technical annex(es) of the Directive and proposed that the best way is to integrate them into other legislation such as **Directive 2008/96/EC** of the European Parliament and of the Council of 19 November 2008 on **Road Infrastructure Safety Management (RISM)**. As part of the review and in the general interests of road safety, Directive 2008/96/EC is also being evaluated.

At this moment, the RISM Directive (2008/96/EC) considers:

- Road Safety Impact Assessments
- Road Safety Audits
- Network Safety Ranking
- Road Safety Inspections
- Knowledge exchange
- Adaptation to technical progress
- Collision Data Collection

¹ http://www.cedr.eu/download/Publications/2016/Main_Road_Safety_Challenges_for_European_Road_Directors_Oct2016.pdf

² http://ec.europa.eu/atwork/pdf/201621025_refit_scoreboard_2016_en.pdf

2. Evaluation of the Directives

The evaluation of the RISM and Tunnel Safety Directives gave a number of possible changes/improvements which will be discussed all over Europe during the next months.

Inclusion of Technical Specifications in the RISM

Perhaps the most important proposed change by the European Commission is the proposal to integrate the Technical Annexes from the Tunnel Directive into the RISM Directive. The question that needs to be asked is, if it is appropriate to place technical specifications into the RISM Directive.

The Annexes of the Tunnel Directive are very specific to tunnels:

- Annex 1 deals with the physical characteristics of the tunnels including geometry, escape routes, drainage, lighting, ventilation, emergency stations, as well as tunnel operations like works in the tunnel and tunnel closures.
- Annex 2 deals with the design, commissioning and periodic inspections of the tunnels.
- Annex 3 deals with signing specifically for tunnels.

It is very difficult to see what relevance these annexes would have outside of the tunnel environment. In fact, including these annexes in the RISM Directive could lead to some unforeseen problems. It is difficult to see how the requirement for detailed reporting on fires in tunnels would transfer very easily to the TEN-T network. A fire in a tunnel can be a very serious incident, whereas a vehicle fire on the road network could very easily go unnoticed/unreported to the road authority.

The objectives of REFIT are not addressed by this approach, because no legislation would be repealed (the number of pages of legislation will remain unchanged) and it would not provide any benefit for the relevant authorities.

More importantly the Tunnel Directive has a different philosophy which would open the way for further technical specifications to be included in the RISM Directive. This could lead to EC technical specifications for not only tunnels and safety barriers (minimum requirements), but also for road markings, signage, gantries etc.. **Infrastructure standards are defined at a national (or regional) level on the basis that local conditions dominate the technical requirements.** Additionally, **prescriptive technical requirements in a Directive will restrict technical developments rather than enable them.** For example, the progressive implementation of Cooperative and Automated Driving will require new approaches which the legislative process may not be able to follow.

Under single market legislation such as Construction Products Regulations, CEDR members already face challenges to adopt European wide standards for road safety applications. **It would not assist road authorities to improve road safety to add greater requirements in this field.**

CEDR members will continue to work together on sharing experiences and best practices with respect for local conditions and applying the results of on-going research in the field.

Measurement of safety performance

Another European Commission proposal is for the measurement of safety performance of roads and the possibility of linking a certification to this process, as this would make it easier for the European Commission to benchmark countries and might give an incentive to policy makers to improve their performance (possibly based on the EuroRAP approach). In contrast to this CEDR's view is to directly link the measurement of the network to the use of the results. This requires the integration of measurement methods into the management and processes of the national authorities. **With the existing RISM legislation, CEDR members have experienced considerable success with the Network Safety Ranking. CEDR's WG Road Safety will continue to develop the approach based on appropriate measures for national conditions closely linked to effective national network management.** The EuroRAP 'black box' approach could be seen very much as a backward

step by many NRA's, when compared with Network Safety Ranking. CEDR does not see an advantage in using a third parties approach and therefore CEDR does not want NRA's to be forced in a Directive to use EuroRAP for safety performance ranking.

Scope of application of the Directive

Many NRA's have successfully applied the principles of the RISM to the national road network rather than limiting to the TEN-T. The focus ought to be the most important roads. The importance could be determined by traffic volume and role/function in the network.

Many CEDR members have already extended the scope of the RISM to both national roads and tunnels. There are no detrimental effects from this approach reported.

Learning from our peers

CEDR agrees that greater knowledge exchange is needed. The recent slowing of progress on road safety performance across Europe is the result of many factors, which need cooperation to be effectively dealt with. Therefore, CEDR is concerned about the reduction in international exchange that has resulted from budget restrictions. **CEDR encourages all Ministries to give more priority to the exchange of peer-to-peer knowledge and experience between national authorities.** The CEDR members have already cooperated in road safety research for many years. The main goal is to get results that add value and which are easy to implement. The implementation is an important part of the results of the research.

CEDR will formalise regular road authority seminars on RISM related issues with CEDR WG road safety members. The first of these seminars was held in April 2016 in Dublin and proved to be a great success with fruitful exchange of experiences and networking. This will be continued in the near future.

Adaptation to technical progress

Under the current practise for the Member States' Road Safety Committee, 'where appropriate, relevant non-governmental organisations, active in the field of safety and management of road infrastructures, may be consulted on matters related to technical safety aspects.' CEDR welcomes the inclusion of a wide range of stakeholders in the shared challenges of road safety. Industrial input to the process could be useful, however competitiveness issues should not be allowed to cloud road safety discussions and/or limit innovation especially from disruptive technologies.

Shared objectives, local solutions

The benchmarking of performance and exchange of best practice is a cornerstone of CEDR activities. CEDR members are best able to evaluate their performance and learn from the experience of their peers. In many cases, Key Performance Indicators (KPIs) have provided strong incentives for NRA's to develop more effective solutions. **NRA's have proved to be very able to respond effectively to KPIs when given sufficient freedom to find their own approaches which are more close to their own national conditions and fit within their own processes.**

3. Next steps

The formal way of dealing with these issues is through the EC Member States Road Safety and Tunnel Safety Committees. This normally includes the Perm Reps and well as some national experts. The next meetings are expected to take place in November 2017 and will include presentations on EU-funded projects looking at combining RISM and tunnel issues. The meeting documents of the last meeting on 10th November 2016 are attached.

There will be an impact assessment support study starting in March and on-line public consultation on the EU legislative framework for Road Infrastructure Safety Management, conducted by a

consultant commissioned by DG MOVE. The consultation is expected to close in May 2017. This consultation will be taken into account in the formulation of future strategies.

On March 29th, the EU Ministers of Transport will meet in Malta to agree a declaration on road safety³. CEDR will host a follow up meeting between key stakeholders to determine the next steps.

4. COMMON CEDR STATEMENTS

The Governing Board of CEDR agrees that:

Merging the Tunnel and RISM Directives would not provide any benefit for the relevant authorities.

Infrastructure safety standards need to be defined at a national (or regional) level on the basis that local conditions dominate the technical requirements.

Member state organisations have different structures and therefore need tailor made solutions. Prescriptive detailed requirements in the RISM Directive will restrict developments rather than enable them. It would not assist road authorities to improve road safety to add greater requirements in this field.

With the existing legislation, CEDR members have experienced considerable success with the different methods of Network Safety Ranking. CEDR's WG Road Safety will continue to support development of approaches based on appropriate measures for national conditions closely linked to effective national network management.

Many CEDR members have already extended the scope of the RISM to both national roads and tunnels. There are no detrimental effects from this approach reported. A wider application should be encouraged on voluntary basis with an emphasis on the most important roads and the importance could be determined by traffic volume and role/function in the network.

CEDR encourages all Ministries to give more priority to the exchange of knowledge and experience between national authorities. CEDR members give more priority to the exchange of knowledge and experience and where useful coordinated and cooperative applied research. Traffic safety innovations have to be encouraged.

CEDR will organise regular road authority seminars for peer-to-peer exchange. The emphasis on the biggest traffic safety problems is needed which can be solved by cost-effective measures. Tools for comparison and benchmarking need to be considered.

NRA's have proved to be very able to respond effectively to KPIs when given sufficient freedom to find their own approaches which are more close to their own national conditions.

CEDR invites the Member States and European Commission to discuss its approach to road safety improvements through increased cooperation between the NRA's.

³ https://ec.europa.eu/transport/road_safety/events-archive/save-date-%E2%80%93-high-level-conference-road-safety-malta-28-29-march-2017_en