



ACEA

## **Road Infrastructure Safety Management**

### **Commission's Proposal for a Directive<sup>1</sup>**

#### **ACEA's Position**

**December 2006**

#### **1. Introduction**

ACEA (European Automobile Manufacturers Association) represents the interests and views of the thirteen major European car, truck and bus manufacturers. All ACEA member companies are key global players and have integrated operations in the European Union. They produce nearly twenty one million units with a turnover of over €450 billion. They employ over two million people directly and around twelve million people rely for their livelihood on the automotive sector in Europe.

European Vehicle Manufacturers welcomes this proposal for a Directive on road infrastructure safety management. Road safety is important for all Europe's citizens and the automobile industry has achieved a great deal over the last several decades to reduce the fatalities and injuries on Europe's roads. As a result fatalities have halved while traffic has trebled. Nevertheless, the number of fatalities still remains too high.

It is clear that vehicle safety can still deliver some improvements. But it is becoming increasingly clear too that returns are diminishing and that a new approach is needed. Vehicle makers know from their research that the full potential of casualty reduction would only be possible if a more integrated approach is taken addressing vehicles but also driver behaviour and infrastructure design, construction and maintenance. While a great deal of improvements has been made to vehicles and some action has been taken on drivers' behaviour, little has been done on road infrastructure safety. Analysis by EuroRAP<sup>2</sup> shows that road infrastructure improvements are expected to deliver the greatest savings, around half of the total, compared to improvements to vehicles and road user behaviour.

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<sup>1</sup> Proposal for a Directive of the European Parliament and of the Council on road infrastructure safety management, Brussels, 5.10.2006, COM(2006) 569 final

<sup>2</sup> EuroRAP, European Road Assessment Programme, [www.eurorap.org](http://www.eurorap.org)

ACEA, therefore, agrees with the Commission assessment that “besides action on the driver and the vehicle, infrastructure should be the third pillar of any comprehensive road safety programme based on the principle of the integrated approach”.

## 2. Road Infrastructure Safety Management and CARS 21

This was exactly the approach that was taken in CARS21<sup>3</sup> and measures were identified in all three lines of action. Infrastructure is one of them. It is no longer acceptable to assume that the infrastructure is merely the neutral context in which drivers have accidents. Developing and maintaining safe infrastructure deserves the utmost effort from Member States’ authorities. There are clearly cost-effective measures that can be taken to improve the safety of the infrastructure and help deliver the ambitious fifty per cent reduction target, which we are all working towards.

The CARS21 report identifies how this can be done and Recommendation no. 12 states:

Infrastructure measures.

- *The conduct of road safety audits, impact assessments and inspections (including safety mapping, prioritisation and communication of high risk routes and locations)*
- *The implementation of corrective measures*
- *The stricter conditioning of Community financing in the road sector on support to projects which follow road safety best practice*

As the Commission’s Impact Assessment says, much credit should be given to EuroRAP for pioneering the role that infrastructure safety plays in the overall picture and ACEA is pleased to be able to support EuroRAP in its work. We must now build on what EuroRAP is teaching us about affordable, well-designed engineering measures applied in the right places to reduce the number and mitigate the effects and consequences of crashes. EuroRAP findings should serve as a basis for any future actions in the field of road infrastructure safety management.

## 3. Harmonised legislation vs. Guidelines

In view of the clear role that road safety audits, assessments and inspections play in identifying and implementing cost-effective corrective measures, the Commission’s proposal for a Directive on road infrastructure safety management is very much welcomed. There are indeed clear benefits that can be achieved in casualty reduction. Vehicle manufacturers are however convinced that proper harmonised infrastructure safety management standards in the Member State would have been the optimum solution for achieving such casualty reduction.

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<sup>3</sup> The CARS 21 High Level Group launched by Commissioner G. Verheugen in 2005 has examined the major policy areas which impact the competitiveness of the European automotive industry and has agreed on a number of recommendations which aim to enhance the industry’s global competitiveness and employment while sustaining further progress in safety and environmental performance at a price affordable to the consumer.

Vehicles have had this for many years so the same benchmark solutions should have been applied to infrastructure. This may have caused problems for Member States but they must take their share of the responsibility for the casualty reduction targets that they themselves have signed up to.

It is true that some corrective measures could involve large investments but this is not universally the case. There are many quite inexpensive measures that could be undertaken as a first step that would save many lives. Many of these are proposed by EuroRAP and include: anti-skid surfaces, road markings, signing, lighting, median separation, roundabouts, sheltered turning lanes, guard rails, refuges and so on. Many of these could be done during normal maintenance and repair schedules. However, these measures should not replace investments needed for ensuring road safety (i.e. signing instead of modifying dangerous roads). Europe's citizens expect these improvements to take place. EU Member State governments collect €360 billion from road users. It is unacceptable that only a small fraction of this sum is reinvested in the improvement and maintenance of the road network.

#### **4. The proposed instruments**

ACEA agrees with the measures proposed in the Directive. Impact assessments, safety audits, safety management and inspections all have an important role in identifying what needs to be done. It must be clear that the emphasis must be on carrying out the corrective measures to improve the safety characteristics of the road network and to actually save lives.

One area, which is now being identified as in need of more careful analysis, is signage and the setting of speed limits. Whether or not speed limits exist and what those speed limits should be is a Member State issue, which should be subject to the subsidiarity principle. It is increasingly clear though that the signals and potential speed limits should be coherent, appropriate, credible and understandable to road users. This should be done using an appropriate methodology and specification, which takes into account the dynamics of the vehicle and the road environment and not based on some arbitrary or fixed system.

#### **5. TERNs or the entire road network?**

The Trans-European road network is almost entirely made up of motorway or similar grade roads. These are the safest roads that Europe has built. These roads are not where the majority of fatalities occur. Most of the casualties occur on single carriageway roads outside urban areas. It is clear that the measures proposed should not apply only to the Trans-European road network. Member States should carry out the assessments, audits, inspections and most importantly, the corrective measures on those parts of their road network where fatality reductions can justify it, irrespective of whether or not they are part of the Trans-European Network. To limit the applicability of the requirements to the roads which are already the safest would pass up a major opportunity to save lives.