

Public consultation on road infrastructure and tunnel safety

Fields marked with * are mandatory.

Introduction

The EU regulatory framework for road infrastructure safety management is composed of two Directives: Directive 2008/96/EC on road infrastructure safety management (the Road Infrastructure Directive) and Directive 2004/54/EC on minimum safety requirements for tunnels in the trans-European road network (the Tunnel directive).

The current EU legislation covers roads and tunnels within the Trans-European Transport Network (TEN-T), which is a network of main European roads (primarily motorways and national/main roads). ([Map of the TEN-T network](#))

The effects of the implementation of the two Directives were assessed in two separate ex-post evaluations that were completed in 2015. The evaluation studies also indicated that there were areas for potential improvements in the field of road infrastructure safety.

The European Commission has launched an impact assessment process with a view to the possible revision of the EU road infrastructure safety management and road tunnel safety legislation. This on-line public consultation is organised to allow interested stakeholders and citizens to express their views on this as part of the impact assessment process.

Please note that in addition to answering the survey questions respondents also have the option of uploading relevant documents.

About you

* You are welcome to answer the questionnaire in any of the [24 official languages](#) of the EU. Please let us know in which language you are replying.

English

* You are replying

- ☐ as an individual in your personal capacity
- ☒ in your professional capacity or on behalf of an organisation

* First name

Karl

* Last name

Downey

* Email address

If you do not have an email address, please write "Not available".

K.DOWNEY@eupave.com

* Country of residence

Belgium

* Name of your organisation

EUPAVE - European Concrete Paving Association

* Postal address of your organisation

68, Vorstlaan/Boulevard du Souverain, 1170 Brussels (Belgium)

* Type of your organisation

- ☐ Private enterprise
- ☐ Professional consultancy firm, law firm, self-employed consultant
- ☒ Trade, business or professional association
- ☐ Non-governmental organisation, platform or network
- ☐ Research and academia
- ☐ Churches and religious communities
- ☐ Regional or local authority (public or mixed)
- ☐ International or national public authority
- ☐ Other

* Please specify the type of organisation.

- ☐ Chamber of commerce
- ☒ Business organisation
- ☐ Trade union
- ☐ Representative of professions or crafts
- ☐ Other

* Is your organisation included in the Transparency Register?

If your organisation is not registered, we invite you to register [here](#), although it is not compulsory to be registered to reply to this consultation. [Why a transparency register?](#)

- ☒ Yes
- ☐

- No
☐ Not applicable

* If so, please indicate the Register ID number.

76295483387-66

* Country of organisation's headquarters

Belgium

Your contribution,

Note that, whatever option chosen, your answers may be subject to a request for public access to documents under [Regulation \(EC\) N° 1049/2001](#)

- ☒ **can be published with your organisation's information** (I consent the publication of all information in my contribution in whole or in part including the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication)
- ☐ **can be published provided that your organisation remains anonymous** (I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent the publication.

Main issues

The purpose of the questions in this section is to verify the relevant issues identified by the Commission, to assess the relative importance of these issues and to identify any possible additional questions that have not been considered yet.

Recent studies carried out for the European Commission indicate that the current EU regulatory framework for road infrastructure safety management could be further improved to meet the objectives of the legislation.

The studies indicate that the actual implementation of safety management procedures differs between Member States resulting in diverging levels of road infrastructure safety performance.

Furthermore, the current legislation only covers roads and tunnels that are part of the Trans-European Transport Network (TEN-T) whereas about 90% of road fatalities occur on other, non-TEN-T roads including busy national and regional roads carrying significant amounts of international traffic.

The evaluation of the tunnel safety Directive has been included in the Commission's Regulatory Fitness and Performance action programme (REFIT).

1. Please select one country from the list below (the country that you know best). This selection of country will also apply to other questions later on in the questionnaire.

Belgium

2. How do you rate the safety of the road infrastructure in the **EU in general**?

	Very high	High	Medium	Low	Very low	Don't know / No view
Motorways	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National/main roads	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional/local/ urban roads	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. How do you rate the safety of the road infrastructure in the country you selected under question 1?

	Very high	High	Medium	Low	Very low	Don't know / No view
Motorways	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National/main roads	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Regional/local/urban roads	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

4. Have you experienced any variation in road infrastructure safety on the TEN-T network between countries?

[A complete map over the TEN-T network](#)

- ☐ Yes, significant differences
- ☒ Yes, some differences
- ☐ No, there are no differences
- ☐ I do not know / no opinion

4.a. Please elaborate and explain your answer if you wish.

1000 character(s) maximum

EU Member States committed themselves to develop a TENT-T road network with the best safety standards but there are differences among them. The safest roads are in Sweden and for instance, Slovenia is improving safety with its newly engineered network. Nevertheless, other countries such as Poland or Slovakia have major challenges and need to improve.

5. How do you rate the safety level in road tunnels with respect to infrastructure **in the EU in general**?

- ☐ Very high
- ☐ High
- ☒ Medium
- ☐ Low
- ☐ Very low
- ☐ I do not know / no view

5.a. Please elaborate and explain your answer if you wish.

1000 character(s) maximum

Choice of materials & design helps minimise risk to the public. For fire safety in tunnels, there are benefits that concrete pavements offer. Concrete pavements: i) reduce emissions of toxic fumes; ii) do not increase the fire load; iii) are not flammable so do not contribute to the spread of fire and; iv) remain intact to high temperatures, allowing evacuation of people and access to firefighters.

Some European regulations require the use of concrete pavements in tunnels of length over 500 or 1.000 meters (e.g. in Spain, Real Decreto 635/2006). A study by Spanish firefighters showed that the amount of fumes & heat released by burning asphalt surfaces is comparable to that produced by the combustion of a truck.

EUPAVE proposes that Directive 2004/54/EC could apply to non-TEN-T tunnels longer than 500m and to specify concrete pavements in all new tunnel construction, for which it is necessary that pavement requirements be included within the scope of Directive 2004/54/EC

6. How do you rate the safety level in road tunnels with respect to infrastructure in the country you selected under question 1?











- ☐ Very high
- ☐ High
- ☐ Medium
- ☐ Low
- ☐ Very low
- ☐ I do not know / no view

6.a. Please elaborate and explain your answer if you wish.

1000 character(s) maximum

7. In your opinion which elements of road infrastructure should be addressed to increase road safety?

	Significant improvements are necessary	Some improvements are necessary	No improvements needed	No consequence on traffic safety	I do not know / no opinion
* Design and construction of new roads	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Maintenance and repair of existing roads	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Upgrading the safety features of existing roads	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Quality of road equipment (e.g. crash barriers)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Visibility of road markings on the road surface	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Visibility of road signs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Protection of vulnerable road users (pedestrians, cyclists and	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

motorcyclists), e. g. by providing segregated bicycle paths					
* Availability of real-time traffic information services					
* Safety ranking of roads					

8. Which particular measures would you propose to address these issues? Please elaborate and explain if you wish.

3000 character(s) maximum

EUPAVE considers that many of the problems that road users face today are linked with the degradation of existing roads. For this reason, durable pavements should be preferred in order to improve safety.

Furthermore, road safety can be enhanced with concrete safety barriers. In particular, a concrete safety barrier in the median reserve of motorways offers a high containment and thus reduces the risk of crossover accidents, and is designed to redirect errant vehicles without unacceptable risks for both vehicle occupants and other road users and third parties. In addition, maintenance costs are practically non-existent.

*9. In your opinion how ready is the existing road infrastructure for the deployment of automated or connected driving?

- ☐ Ready
- ☐ Somewhat ready
- ☒ Not ready
- ☐ No view / I do not know

9.a. Please elaborate on your answer if you wish.

3000 character(s) maximum

EUPAVE considers that automated driving has potential to increase road safety significantly – as human error is involved in more than 90% of all traffic accidents on European roads – and connected vehicles can also help raise fuel efficiency. Physical infrastructure will play a crucial role in the development of connected, automated and electric driving solutions. Infrastructure requirements will need to be established in order to guarantee that these systems can safely operate. Thus, it will be necessary to determine which infrastructure elements will be suitable for the different automation levels and who should be responsible for providing and maintaining the physical infrastructure.

In this sense, durable and predictable infrastructure – as offered by concrete pavements – is a prerequisite to fully exploit the advantages of connectivity.

10. Do you see other problems related to road infrastructure safety that may need to be addressed? Please describe the problems below and if relevant please provide possible measures to tackle the problems.

3000 character(s) maximum

The role of the EU

- * 11. In your opinion, what should be the scope of EU legislation in the area of road infrastructure safety management?
- ☐ All roads
 - ☒ All main or national roads
 - ☐ Road infrastructure of European importance (TEN-T roads, motorways and national roads carrying significant traffic)
 - ☐ The TEN-T road network (current legislation)
 - ☐ The scope should be reduced (please explain below if you wish)
 - ☐ The EU should not set any rules in this respect
 - ☐ No opinion / I do not know
- * 12. In your opinion, what should be in the scope for EU legislation in the area of **road tunnel safety**?
- ☐ All tunnels
 - ☒ All road tunnels longer than 500 metres
 - ☐ All road tunnels in the road infrastructure of European importance (TEN-T roads, motorways and national roads carrying significant traffic)
 - ☐ All road tunnels above 500 m on the TEN-T road network (current legislation)
 - ☐ The scope should be reduced (please explain below if you wish)
 - ☐ The EU should not set any rules in this respect
 - ☐ No opinion / I do not know

13. Do you have any other comments related to the role of the EU in relation to these issues?

3000 character(s) maximum

EUPAVE proposes to:

Ensure that both Directives' impact extends beyond the TEN-T road network: Directive 2008/96/EC could apply to all motorways and Directive 2004/54/EC could also apply to non-TEN-T tunnels longer than 500 m.

Make possible the use of Directive 2008/96/EC for EU funding in infrastructure projects.

Specify concrete pavements in all new tunnel construction for fire safety reasons, for which it is necessary that pavement requirements be included within the minimum safety scope established by Directive 2004/54/EC.

Overall approach to addressing the problems

A number of possible approaches could be taken to address the challenges identified above. Please rate the different policy principles according to your preference.

14. Do you agree that there should be common EU minimum performance requirements for road equipment (e.g. crash barriers) in order to improve road safety?

- ☐ Fully agree
- ☒ Rather agree
- ☐ Rather disagree
- ☐ Fully disagree
- ☐ No view / I do not know

15. Do you agree that there should be common EU minimum performance requirements concerning the visibility of road markings on the road surface?

- ☐ Fully agree
- ☐ Rather agree
- ☐ Rather disagree
- ☐ Fully disagree
- ☒ No view / I do not know

16. Do you agree that there should be common EU minimum performance requirements for the visibility of road signs?

- ☐ Fully agree
- ☐ Rather agree
- ☐ Rather disagree
- ☐ Fully disagree
- ☒ No view / I do not know

17. Do you agree that rather than aiming for common EU minimum performance requirements, the exchange of best practices regarding road infrastructure safety management should be promoted at the EU level?

- ☒ Fully agree
- ☐ Rather agree

- ☐ Rather disagree
- ☐ Fully disagree
- ☐ No view / I do not know

18. Do you agree that the safety of road infrastructure should be measured across the EU using comparable methodologies in order to give more standardised information to road users on the actual safety of the roads they use?

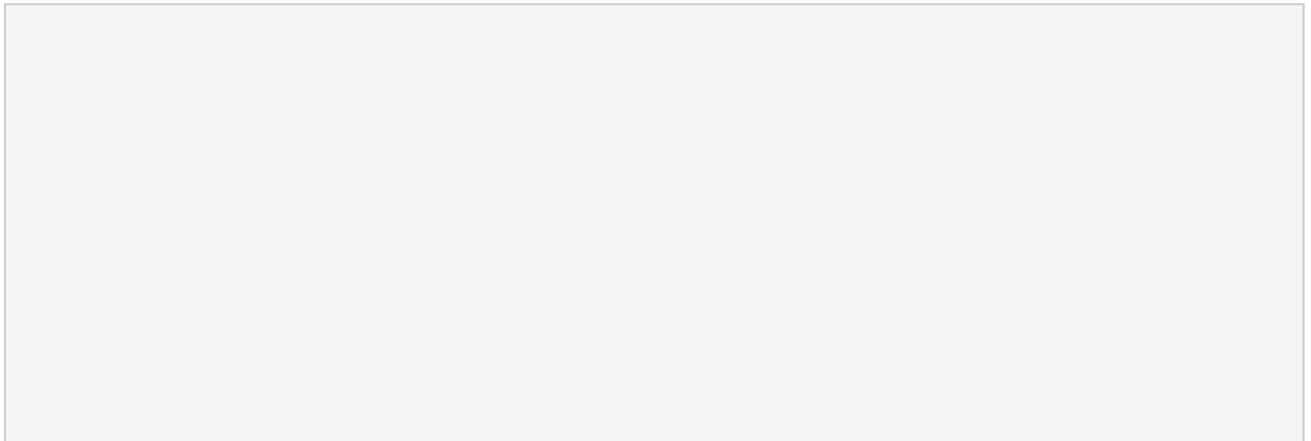
- ☒ Fully agree
- ☐ Rather agree
- ☐ Rather disagree
- ☐ Fully disagree
- ☐ No view / I do not know

19. Do you agree that minimum road infrastructure safety requirements should be established for roads that are part of the trans-European transport network guaranteeing road users a certain minimum level of safety on these roads?

- ☒ Fully agree
- ☐ Rather agree
- ☐ Rather disagree
- ☐ Fully disagree
- ☐ No view / I do not know

20. Would you like to make any other comment or suggestion?

3000 character(s) maximum



Document upload and final comments

21. Please feel free to upload a concise document, such as a position paper. The maximal file size is 1MB.

Please note that the uploaded document will be published alongside your response to the questionnaire which is the essential input to this open public consultation. The document is an optional complement and serves as additional background reading to better understand your position.

22. If you wish to add further information - within the scope of this questionnaire - please feel free to do so here.

3000 character(s) maximum

Sources for statements on fire safety in tunnels above (question 5a):
http://www.ieca.es/show_doc.asp?id_doc=511
<http://www.eupave.eu/documents/technical-information/eupave-publications/eupave-safety-of-tunnels-in-case-of-fire.pdf>

Useful links

Europa consultation page (https://ec.europa.eu/transport/modes/road/consultations/2017-road-infrastructure-safety_en)

Contact

MOVE-Road-Infrastructure-Safety@ec.europa.eu
