

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.

Swedish

* You are replying

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

*First name

Maria

*Last name

Nordqvist

*Email address

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

maria.nordqvist@svmc.se

* Country of residence

Sweden

* Name of your organisation

Sveriges MotorCyklister

*Postal address of your organisation

Gamla Tunavägen 30, 78460 Borlänge

* 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
- Reserach and academia
- Churches and religious communities
- Regional or local authority (public or mixed)
- International or national public authority
- 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.

331650823587-92

* Country of organisation's headquarters

Sweden

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.

Sweden

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 checked="" 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"/>

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

The choice of measures in Sweden are based entirely on persons travelling in cars. The choice of barriers is the most obvious example. While a Cable barrier save lives of persons in cars, they cause severe injuries and fatal accidents among riders every year. Motorcycle Protection System are used in other countries but not Sweden. Hooks and protruding parts are allowed on obstacles on the roads on highways in Sweden.

The choice of roadside measures are different. In Sweden a road side barrier is seen as safe for all road users and forgiving road sides are rarely used. Black spot management is used to improve road safety outside Sweden with good results. In Sweden this is not used.

Bleeding asphalt is a huge problem in Sweden. Gravel on paved roads is a major problem on smaller main roads.

The methods used to repair roads in Sweden causes serious and fatal motorcycle accidents every year. The lack of warning signs in road repairs is a major problem, on the smaller main roads

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

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 checked="" type="radio"/>	<input 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"/>

<p>*Visibility of road markings on the road surface</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*Visibility of road signs</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*Protection of vulnerable road users (pedestrians, cyclists and motorcyclists), e.g. by providing segregated bicycle paths</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*Availability of real-time traffic information services</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*Safety ranking of roads</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

3000 character(s) maximum

Inclusion of the safety of all road users in designing and Constructing the roads, also motorcyclists.

Review all existing regulations to include them in all EU-countries.

Include safety of all road users when deciding the choice of method to repair and maintain the roads.

Support all measures that doesn't impair on the safety of vulnerable road users.

Introduce a standard that demands safety for motorcyclists in choice of barriers EN1317-8, i e include motorcyclists in the test method.

The new standard must be used in the TENT-network and in black spots.

Introduce demand for non slippery road marking.

Introduce demands for friction tests on new asphalt, after road maintenance, especially on the TENT-roads.

Introduce a demand for a safety and/or recovery zone where no obstacles can be placed, like for example barriers.

Introduce a demand for using forgiving roadsides instead of barriers.

Introduce a demand to review the existing road Equipment and the impact the barrier had on the outcome of the accident when a fatal occurs and kills a road user. For example a barrier. 70 motorcyclists have been killed in collisions with barriers in Sweden. Not one meter have been changed or improved with MPS after the accidents.

Introduce a demand to Review a road and the existing road Equipment when several severe accidents occur. There is a short part on a TENT-road (E6) where 4 riders have been killed in less than a year + several severe barrier accidents. No investigation has started about how to improve the road, the road design etc.

Introduce training for people working with road design, Construction, maintenance, repair, which includes vulnerable road users and how their safety can be increased.

Include cooperation with the vulnerable road users, such as our organisation SMC.

*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

There is still not enough knowledge about how connected driving will impact on motorcyclists and other road users

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

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

I add some documents which includes proposals for safer roads for motorcyclists. One is still in Swedish but will be translated. They are too big to upload, here are the links:
Säkrare vägar och gator för motorcyklister - en självklar del av Nollvisionen: http://www.svmc.se/smc_filer/SMC%20centralt/Rapporter/2017/S%c3%a4krare%20v%c3%a4gar%20och%20gator%20f%c3%b6r%20MC.pdf
Definition of a safe barrier for motorcyclists: http://www.svmc.se/smc_filer/SMC%20centralt/Rapporter/2015/Safe_barriers%20Final%20report.pdf
Safer roadsides for motorcyclists: http://www.svmc.se/smc_filer/SMC%20centralt/Rapporter/2015/S%c3%a4krare%20sidomr%c3%a5de%20fr%c3%a5n%20ett%20MC%20perspektiv_Final.pdf

Useful links

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

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