AISCAT position on:

EC-DG TREN questionnaire about the IV European Road Safety Action Programme

Rome, November 2009
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1. FOREWORD

This document represents the position of AISCAT - the Italian Association of Tolled Motorways and Tunnels Operators – with respect to the questionnaire published by the European Commission – DG TREN services – about the IV European Road Safety Action Programme due to be launched by the European Commission on the 2\textsuperscript{nd} of December 2009 in Brussels.

The public consultation with the on-line questionnaire ended last 20\textsuperscript{th} November. AISCAT answered on-line to the EC questions (\textit{file reference number: 594708117211532409 of 20.11.2009}) as many stakeholders of the road sector and wishes to thank the European Commission for giving this opportunity. However, considering that Road Safety is a crucial issue and that it is difficult – and somehow restrictive - to express its own views on the matter only through a questionnaire, AISCAT decided to summarise its answers to the on-line questionnaire in a more structured and comprehensive way, by drafting the present document.

With this paper, AISCAT aims therefore to bring to the Commission’s attention, the position and the experience of those stretches of the Italian Tolled Motorway network that are in concession, with respect to a subject of absolute relevance and complexity such as Road Safety.

In sharing the objectives pursued by the Commission and supporting the efforts made by the Commission in order to launch a new Community Action Programme for Road Safety, covering the period 2011-2020, AISCAT wishes to confirm its full support in contributing (with respect to its areas of competence) in a concrete way to all open discussions, both on this occasion as well as in future occasions.

Moreover, AISCAT, taking also into account its relevant experience in the sector, and more specifically in Road Safety, expresses its interest for an active participation in future seminars and debates and further meetings that may be held on the subject in the European context.
2. AISCAT, ITS MEMBERS AND THE TOLLED MOTORWAY CONCESSIONS IN ITALY

2.1 AISCAT and its members

AISCAT – the Italian Association of Tolled Motorways and Tunnels Operators – was established in 1966. Its objective is the collection and comparison of the experiences and common needs of its members, dealing with all the issues related to the planning, construction and operating of toll motorways and tunnels.

AISCAT attention has always focused on two key areas:

- The harmonisation of members’ procedures and behaviour with respect to service operations, relationship with end users and relationship with Public Bodies: all in accordance with the nature of each independent decision making body.
- The promotion of shared positions with respect to the interests and needs of the sector and the subsequent presentation of these to all responsible bodies, both national and International.

The Association’s members are companies, entities and consortia that own a concession for the construction and/or management of Italian toll motorways or tunnels; there are currently 24 members, representing approximately 5,700 kilometres of Motorway network.
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3. **THE ERSAP (EUROPEAN ROAD SAFETY ACTION PROGRAMME) CONSULTATION**

3.1 **PERSONAL PERCEPTION OF THE SITUATION ON THE ROADS IN YOUR COUNTRY**

Do you think that, in general, traffic in your country has become safer or less safe than 10 years ago?

**AISCAT:** Safer, mainly along Motorways.

**Why?**

**AISCAT:** Although the number of both accidents and deaths is still high, the main indicators and parameters have shown, during the latest years, an improvement of road safety, due mainly to the new legislative instruments applied in Italy to regulate the matter (i.e. the legislation about the so-called “*patente a punti*”, points driving licence). For sure there is still a lot to be done, in terms of infrastructure, education, communication, mainly vis-à-vis of those categories of users (young drivers, motorists, cyclists, pedestrians) especially in the urban areas. To this extent, we underline that Italian Tolled Motorway network has achieved excellent road safety results, with a reduction, during the period 2002-2008, of deaths of – 42.7% and a reduction of fatality rate of – 48.2%, thus being the only road network in Italy in line with the European objective of halving the number of deaths by 2010. These results confirm as well the remarkable engagement of AISCAT (which is also signatory of the European Road Safety Charter since 2004) and of all its members in favour of road safety, both in terms of invested resources and of daily management and network operation.

3.2 **THE SCOPE OF THE NEXT EUROPEAN ROAD SAFETY ACTION PROGRAMME (ERSAP)**

Citizens and businesses expect safe, sustainable mobility across the European Union. Improvements in road safety are an essential element in
public policy to produce improvement in the health and well-being of citizens and reductions in the high socio-economic costs of road traffic injuries. What are the main problems and issues at stake in Road Safety (taking into account Road safety performance and societal costs involved)?

AISCAT: For sure the number of deaths and of serious injuries, as well as the level of socio-economic costs of road crash injuries for the society. Severe accidents have first of all a remarkable impact on the victims’ lives and on their families’ lives: it is not possible to quantify this impact. However, a series of elements related to the social costs of accidents has to be taken into account: waste of working hours, waste of working force, National health system costs, engagement of several resources (such as sanitary resources, police forces, etc.), road reconstruction and equipment, etc.

Road safety problems linked with category of road users: indicate your view on the issue

AISCAT: We think the weakest categories of road users, which are mostly in danger are young novice drivers and pedestrians. All the above mentioned users’ categories are involved in different ways and all of them have to contribute for the improvement of road safety levels. However, among those categories, young people for sure represent the “weakest” element, in relation to which it is necessary to take action in order to correct wrong driving behaviours, also through tailored information and educational campaigns. To this extent, we underline once again that the problems caused by the weakest road users mainly happen in urban areas.

The impact of societal changes: indicate your view on the issue

AISCAT: Ageing of society and lifestyle changes are the main societal elements affecting Road safety behaviours. In fact, Road safety cannot be treated apart from the remarkable increasing of car utilisation’s levels registered in the latest
decades. The traffic growth and the worldwide recognised right to mobility and free circulation have undoubtedly affected and somehow modified life styles (i.e.: increasing of alcohol use in the recent years in Italy), as well as the utilisation of certain technological tools such as the mobile phone. All these elements have deeply affected road safety conditions.

Which, in your view, are the most important countermeasures amongst infrastructure, road user (training, education, rehabilitation, enforcement) vehicle safety measures?

**Infrastructure**

**AISCAT:** Since the first planning phases till the construction, operation and maintenance, the infrastructure – and mainly the care of it - has to be considered as the first priority. Of course, when talking about roads, one cannot only refer to the carriageway, but, on the contrary, one has to refer to the different elements related to the carriageway (barriers, road signs, equipment, etc.). The respect of the technical regulations in force has to be always guaranteed. To that extent, tolled motorways, in Italy and in Europe, represent the most visible example of what we said: specific construction criteria, applied together with up-to-dated management and operational procedures, innovative technologies (i.e. remote-control systems for speed monitoring), represent all the main elements which contribute to guarantee the highest levels of road safety along the concessions’ road network.

**Road user measures: licensing, testing, training, information**

**AISCAT:** Human behaviour is widely recognised as the first cause of accidents. All the elements and instruments that can positively influence human behaviour, by correcting inappropriate and dangerous ways of driving, have to be applied and implemented in a proactive manner, through education, prevention, application of sanctions where needed (for instance in relation to high speed, abuse of alcohol, abuse of drugs, etc.). Certain policies, such as the so-called “patente a punti” - points driving licence or the worsening of sanctions or the
organisation of information and educational ad hoc campaigns, had positive results. For sure a greater coordination and harmonisation of the different actions and strategies about road safety is needed at European level.

Vehicle safety
AISCAT:  
- Need for improved safety quality of vehicle standards and equipment for cars (incl. electric cars).
- Need for improved safety quality of vehicle standards and equipment for heavy commercial vehicles (incl. electric vehicles)
- Need for improved safety quality of vehicle standards and equipment for powered two wheelers. Car industry has undoubtedly make important steps forward in terms of vehicle safety, but it is necessary to strengthen the actions related to the continuous improvement of vehicle safety devices.

Road safety is a shared responsibility at EU, national, regional and local levels with national authorities usually taking the lead. National action typically involves the development and implementation of multi-sectoral strategies and action programmes which address key problems and are focussed on achieving results. Programmes are coordinated across national government and with regional and local authorities, business and civil society. What do you see as the key problems or issues for institutional management of road safety?

AISCAT: In Europe and in the single countries like Italy, Road Safety is one of the first priorities for government’s actions. However, in most cases, we are talking about specific strategies and/or actions undertaken by the single stakeholders and by some Institutional bodies interested in road safety matters, without a real and effective overall coordination between the different involved actors. Lack of appropriate funds to be invested is one of the main problems related to the implementation of measures in favour of road safety, especially in
relation to public Institutions (at all the territorial levels). In this framework, however, there are several non Institutional actors, such as Italian Motorway concessionaires companies, that every year invest relevant resources in order to improve road safety, affecting both the infrastructure itself and the technological equipments along the Motorway network. Unfortunately it has to be noted that, at European level, there is no harmonisation not unanimity of definitions and methodologies in road safety domain. Moreover, a reliable data-base – including traffic data and travelled kilometres – is not available at present in the European Union. To that extent, AISCAT and its members have always highlighted the need of common definitions and of exhaustive traffic data, as basic elements for any in-depth and accurate analysis about road safety.

3.3 THE ROLE OF THE EU

Besides considering Road Safety as an integral element of European transport policy, the EU also contributes to improving road safety by integrating road safety concerns into other EU policies, and by removing obstacles to effective road safety policies that might exist at the EU level. Is in your view the integration of road safety into other areas of EU policy effective?

AISCAT: We think it is partial

If not, in which sectors of policy should this integration be improved according to you?

AISCAT: Research policy, Information and communications technology policy, Education policy should be all improved. Moreover, in order to apply and implement efficient actions about Road Safety, it is necessary first of all to intervene, on education and training towards road users, considering that human behaviour is the most affecting factor for Road Safety; then, it would be advisable to develop new, up-dated and more efficient technological solutions.
Do existing European policies/legislation create obstacles to prevent effective road safety policies at national, regional and local levels?

**AISCAT:** In general terms no, but sometimes EU legislation does not seem to duly take into account the proper cost/benefit relationship (as it happened for instance with the Directive on Tunnels’ Safety in 2004). In fact, in order to optimise the available financial resources, EU legislation should define clear and effective priorities of intervention in the Road Safety domain, avoiding actions or interventions to be undertaken, which can be too much expensive and not efficient.

The EU carries out a range of activity to improve road safety in support of activity carried out nationally, regionally and locally. What should be the priority areas for action in the next programme 2011-2020?

**AISCAT:** We welcome the proposal, from the European Commission, of a European Road Safety objective to 2020 and we would like to underline that so far, EU policies have focused their attention on specific infrastructures such as Motorways, that are already well engaged in guaranteeing to the users high levels and standards of safety and that already implement and apply, along their networks, the most up-dated best practices in terms of construction and operation and the most innovative technologies. Considering the statistics related to the urban areas and to the “weakest” road users (pedestrians, cyclists, etc.) it would be very useful and appropriate to strengthen and improve specific European actions in this sense.

New technologies, innovative and intelligent transport solutions can improve safety, increase efficiency, protect the environment and offer new customer-oriented services to citizens. Is there a need for EU action to increase the market acceptance of new technologies, innovative and intelligent transport solutions?

**AISCAT:** Yes there is a need for that.
List possible fields of EU action on new safety technologies.

**AISCAT:** Possible fields of action could be, by promoting or requiring proven safety-related technologies, the following:

- Intelligent speed adaptation / speed adjust / speed alert / speed limiters
- Alco locks, initially in commercial and public transport vehicles
- Intersection signal control
- Dynamic traffic management
- Local danger warming
- Advanced braking and handling systems in all motor vehicles (like ESC / ESP)
- Lane keeping device systems
- Collision avoidance systems
- e-Call (112 the European emergency number)
- Event data recorder (black box)
- Seat belt reminders
- ISOFIX child restraint system in all cars
- Pedestrian protected car fronts
- Energy absorbing front under run protection in heavy commercial vehicles
- Supporting the mapping of speed limits across the EU

As a general comment on the issue, as it happens for specific Community programmes such as EasyWay - the programme on ITS (Intelligent Transportation Systems), launched in 2007 and aimed at defining and promoting the newest technologies applied to road transportation - we think that the leading role, also in terms of governing and co-financing, played by the EU Institutions is fundamental, provided that the role and the experience of road operators, and of those that on a daily basis are engaged in guaranteeing safety mobility conditions, are safeguarded and maintained.