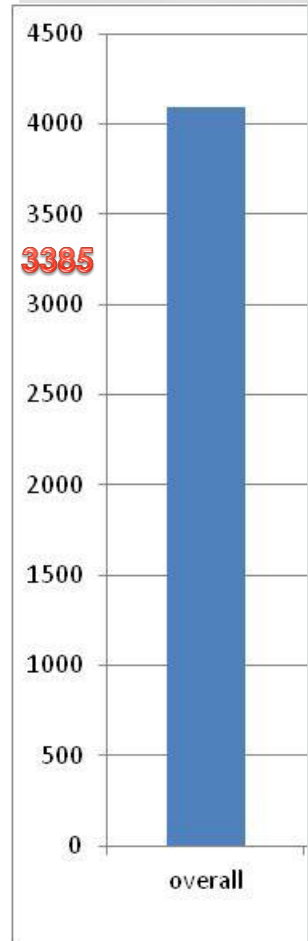




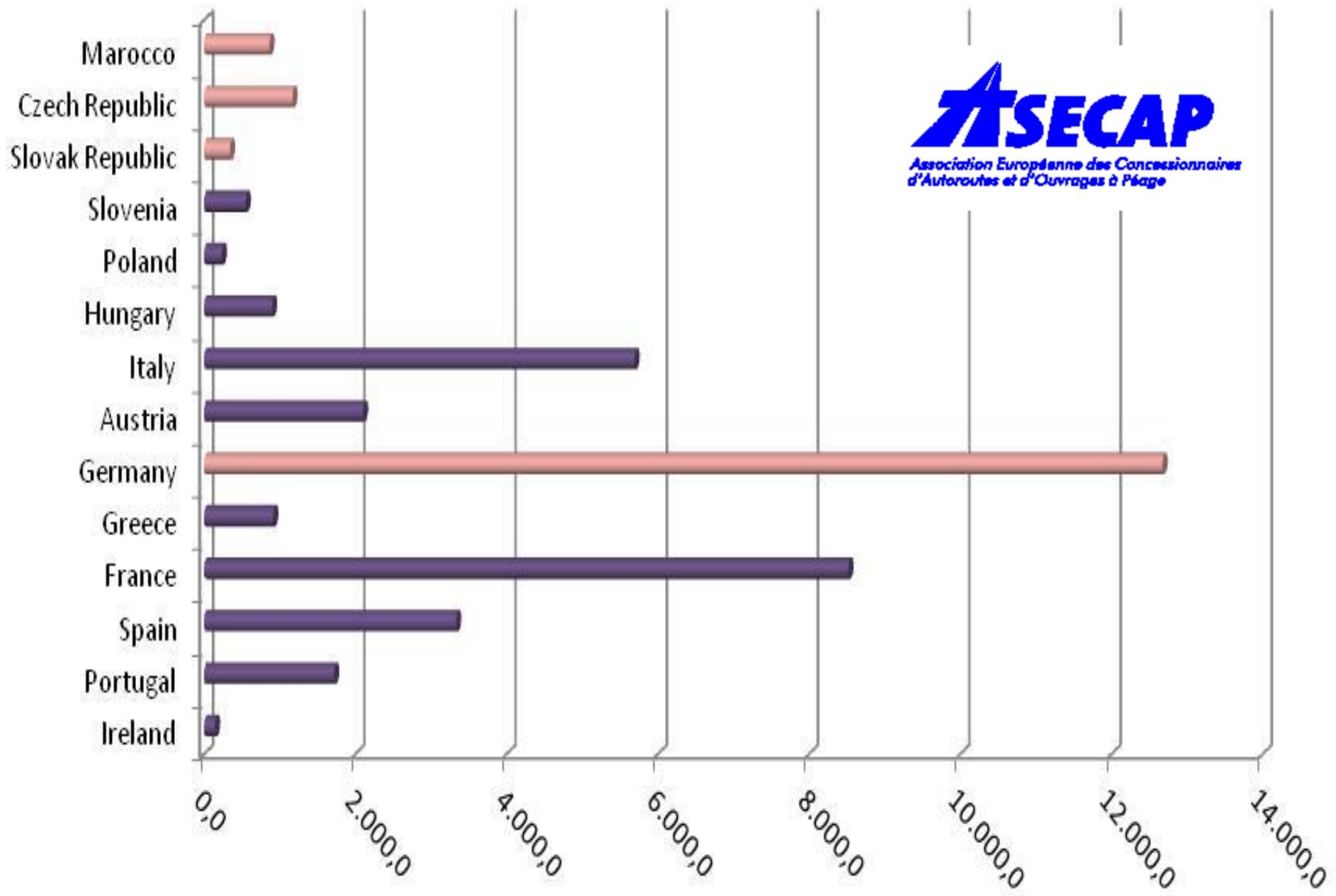
ALCUNE CONSIDERAZIONI SULLE DUE DIRETTIVE ALLA LUCE DELLA POSIZIONE ASECAP

ROBERTO ARDITI – AISCAT/SINA (ASTM-SIAS GROUP)

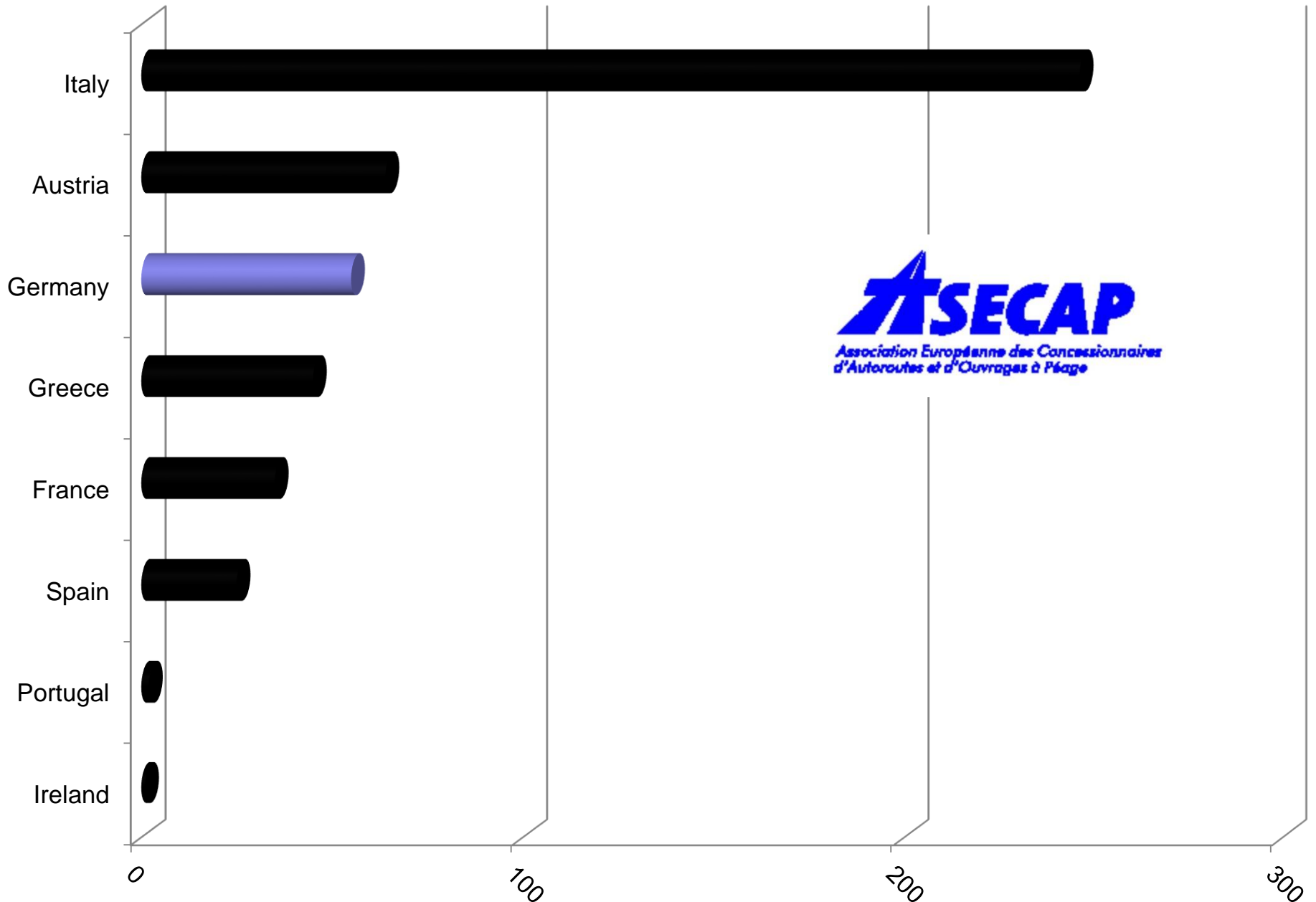
Tunnel safety: the range of magnitude through Road fatalities in Italy (2010)



Length of the network (km) - source ASECAP



Number of tunnels > 500m in 2010 (source EC 2001)





ASECAP Position on

The current revision process of the
Directive 2004/54/EC on "Minimum safety requirements for tunnels in the
Trans-European Road Networks"



BACKGROUND

At the time of the drafting of the Directive, ASECAP and its members underlined clearly some key concerns related to the new regime:

A European Directive on tunnel safety can and must set the safety strategic lines and targets that Member States must commit to. Once the intended safety targets have been identified, Member States and Operators should be entitled to opt for the best and most sound technical and technological choices to be pursued at national level;

The scope of the directive and its proposed measures and timing imply a great amount of road-works which are likely to disrupt traffic and even endanger safety of those networks that present a higher tunnel density.



This has proved to be the case in several Member States managing a high amount of road tunnels falling under the scope of the Directive. This is further demonstrated when considering the current situation: in 2014 the deadline for most Member States expired. Some Member States were not able to meet the deadline even if having a limited number of tunnels when compared with those Members States having the deadline set in 2010.

The tunnel safety issue is part of the overall road safety: investing for tunnel safety is right as long as the global results are optimized. The provisions of the Directives imply high costs. A serious and ad hoc cost-benefit analysis taking into consideration each specific case needs to ensure in order to avoid unnecessary expenditures.



The issue related to the costs for the implementation of this Directive is of utmost importance considering the lack of financial means and resources of many Member States. Moreover new technologies have proven their potential to tackle in a more cost-efficient way safety related issues.

STATE OF THE PLAY

Road Toll Operators underline, once again, their commitment towards the implementation of Directive 2004/54/EC and the great amount of resources and efforts already put in place to comply with the Directive provisions.

Nevertheless some key issues remain open and they should be adequately taken into considerations by the European representatives in the current revision phase.

RECOMMENDATIONS



Regulation (EU) No 1315/2013 of the European Parliament and of the Council of 11 December 2013 on Union guidelines for the development of the trans-European transport network and repealing Decision No 661/2010/EU Text with EEA relevance changed the network



New tunnels within the scope of the 2004/54/CE Directive

The new TEN-T regulation has significantly increased the number of tunnel falling under the scope of the Directive. Therefore the deadlines previously foreseen by the Directive should be changed accordingly, especially for those Member States which own the highest percentage of road tunnels in Europe. The existing time limits should be postponed from 2019 to 2024 or maybe 2028.

RECOMMENDATIONS




The time limits of the Directive do not adequately considered the administrative and legal requirements foreseen at national level necessary to undertake the refurbishment operations of a tunnel infrastructure. Consistency between European and national regulations are seriously needed in order to minimize the administrative burden and ensure that all road tunnels identified meet the safety requirements envisaged by the Directive.

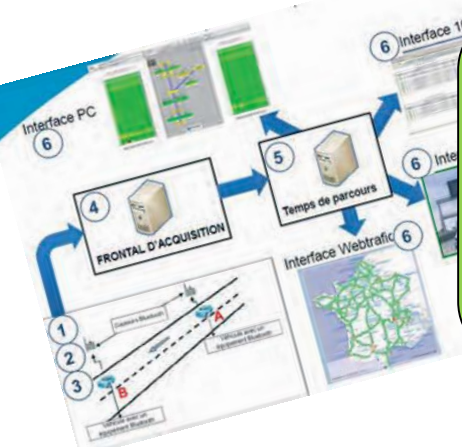


Adequate European and national financial resources sometimes not included into concession contracts should be earmarked for the refurbishment of tunnel infrastructure given the huge costs involved and the stringent time constraints

RECOMMENDATIONS



Reporting activities should be simplified and harmonized in order to simplify the work for road operators and administrative authorities for road tunnels. Furthermore more straightforward reporting procedures would assure a more reliable and concrete picture concerning the implementation of the Directive at European level.



A better use of existing and forecast technologies could lead to solutions less costly and with an equivalent level of safety in tunnels.



THANKS FOR
YOUR KIND ATTENTION

