

Targeted stakeholder consultation questionnaire

Response by Rijkswaterstaat, on behalf of the ministry for Infrastructure and Environment of the Netherlands.

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1.1 Introduction

Dear Sir/Madam

The European Commission has commissioned a consortium comprising COWI and SWOV to carry out an impact assessment support study for the revision of the Directive 2008/96/EC on road infrastructure safety management (*RISM Directive*) and Directive 2004/54/EC on minimum safety requirement for road tunnels in the trans-European network (*Tunnel Directive*).

We would like your support to establish any potential problems under the current legislation, information on the current practices and status in the country you know best, formulating policy options to address any issues and your expert view on the resulting impacts – through sharing of experience and practice by providing examples of successful and innovative practices.

1.2 General introduction to the study

Recent studies^{1,2} commissioned by the European Commission states that the current regulatory framework for road infrastructure safety management and the regulation of road tunnels are not sufficient or effective enough in improving the level of safety in tunnels and on roads.

*Remarks by the respondent (member state The Netherlands):
The studies mentioned above do not exactly support the claim that the regulation is not sufficient or effective:*

- The evaluation of the implementation of the road tunnel safety directive doesn't really demonstrate that the directive is not effective, it merely shows that the implementation is not finished yet by a certain amount of member states. That is the reason why the goals of the directive are not yet fully reached. Moreover, on page 80 of the report it is stated that: "Although the full effects of the Directive are yet to be realised the evaluation has found evidence of positive outcomes and impacts." This actually confirms that the directive itself is indeed effective.*
- The evaluation of the implementation of the RISM-directive also indicates that the directive is effective, see page 97 of the report: "The evaluators would like to point out that while it has been in force for only five years since its adoption, Directive 2008/96/EC appears to be a substantially successful directive and represents an important step in the direction of a more systematic discipline on infrastructure safety". On the same page, it is mentioned as a weak point that the scope limits itself to the TEN-T road network. However, we strongly support the position that the European regulation should limit itself to the TEN-T road network, since the national road network (including the road tunnels) outside the TEN-T is the responsibility of the individual member states.*

However, according to the ex-post evaluation the RISM directive has most probably had a positive influence on road safety and certainly influence road safety in countries, which did not have these procedures in place before. The ex-post evaluation of the Tunnel directive concludes that the directive resulted in a positive effect on awareness of safety problems and has prompted investments in tunnel safety.

Both directives are aimed at the [Trans-European Transport Road Network](#) (henceforth TEN-T road network). Focus in the current study is on the road network and not on any of the other transport

¹ http://ec.europa.eu/transport/sites/transport/files/facts-fundings/evaluations/doc/tunnel_final_report.pdf

² <http://www.tmleuven.be/project/roadinfrastructuresafetygmt/2014-12-ex-post-evaluation-study-road-infra-safety-mgmt.pdf>

modes. Parts of the study will also investigate potential extensions beyond the TEN-T road network. For an overview of the TEN-T road network in your country, please visit this [site](#) or go to the [interactive map version](#), which highlight the actual TEN-T (core and comprehensive) road network.

The two directives are not particularly overlapping in terms of scope. The Tunnel Directive sets minimum safety requirements for tunnels above 500 meters in length. The roads in these tunnels are not included in the framework for road safety management specified in the RISM Directive.

Remark by the respondent (member state The Netherlands):

This choice was made because road safety was already part of the scope of the road tunnel safety directive (2004-54-EC). Tunnels longer than 500m were rightfully excluded from the scope of the RISM-directive (2008-96-EC) to avoid overlap. Given the differences between the two directives, concerning approach, concept and content, as well as the organization and safety management procedures, it is our position that the avoidance of overlap was a very good choice.

However, the RISM Directive provides a framework for road safety management in tunnels below 500 meters in length.

Currently, EU legislation for infrastructure safety management is limited to roads falling within the TEN-T road network. For roads outside of the TEN-T network individual Member States set their own legislation relative to safety on roads and in tunnels.

1.2.1 RISM Directive 2008/96/EC

The RISM Directive sets the framework for infrastructure safety management to be applied by Member States on the TEN-T network.

The RISM Directive's objective is to ensure implementation of harmonised road safety management procedures on the TEN-T road network. This is done through provision of guidelines for all stages of infrastructure planning, development and management (without imposing specific standards or measures on Member States). The main management instruments foreseen by the Directive are road safety impact assessments (RSIAs), road safety audits (RSAs), road network safety management (NSMs) and road safety inspections (RSIs).

- > Road Safety Impact Assessments (RSIAs), covering new roads and applicable at the pre-design stage of the planning process. The road safety impact assessment is a strategic formal procedure for an independent assessment of the likely road safety effect of proposed infrastructure or traffic measures schemes, at the initial planning stage before the infrastructure project is approved.
- > Road Safety Audits (RSAs), covering new roads and applicable at the design, construction and early operational stages of planning process. A road safety audit is an independent detailed systematic and technical safety check relating to the design characteristics of a road infrastructure project and covering all stages from planning to early operation in order to identify, in a detailed way, unsafe features of a road infrastructure project.
- > Road Safety Inspections (RSIs), covering existing roads and applicable in the operational phase of a road. A road safety inspection is an ordinary intermittent verification of the characteristics and defects that require maintenance work for reasons of safety as a preventive tool. RSIs aim

to identify potential problems so countermeasures can be taken to remove or minimize the chance of an accident occurring.

- > Network Safety Management (NSM) targeting the management of the so-called accident “black spots”. The ranking of high accident concentration sections is a method to identify, analyse and rank sections of the existing road network based on number of crashes and traffic volumes. In addition, the network safety ranking is a method to identify, analyse and classify parts of the existing road network according to their potential for safety development and accident cost savings.

The RISM framework does not state any required minimum standard (specific technical standards or technical measures), and is therefore largely based on individual national guidelines applied in each EU member state. These national guidelines are developed on the basis of the RISM Directive.

The RISM directive only applies to roads falling within the TEN-T road network and explicitly excludes Tunnels longer than 500 meters in length.

1.2.2 Tunnel Directive 2004/54/EC

The Tunnel Directive describes safety measures and procedures for authorities in the Member States to ensure a minimum level of safety in all the tunnels longer than 500 meter.

The Tunnel Directive has two main objectives:

- > to ensure safety in tunnels by preventing the occurrence of critical events that may endanger human life, the environment or tunnel installations, and
- > to alleviate the consequences of such a critical events should it occur, through improved protection of road tunnel users in case of accidents

The directive does not cover tunnels shorter than 500 m and does not cover tunnels outside the TEN-T road network. The road safety instruments described in the RISM Directive that apply for roads and shorter tunnels do not apply for tunnels longer than 500 m.

1.3 General questions

This questionnaire contains questions marked with [Member States], which are primarily intended for representatives of Member States. The section also contains questions marked with [Experts], which are primarily intended for independent experts/institutions. You are welcome to provide an answer for each question whether you are an expert or representative of a Member State.

Please provide references to studies or documents that you think are relevant to support your claims and please provide links for online download where possible.

Question 1. In what capacity are you responding to this questionnaire? Please mark the relevant category with a "X" in the table below.

Category	Please selected the relevant category for you
Non-governmental organisation/association	
Public authority (policymaking in the field of road/tunnel safety)	X
Academia (e.g. road safety expert, research, university)	
Other (please specify):	

Question	Answer
<p>Question 2 Please provide the name of the capacity you are responding on behalf of. (<i>i.e. name of association/authority/university</i>).</p>	<p>This is the official response of the Ministry of Infrastructure and the Environment, as the representative of The Netherlands as a member state of the European Union.</p> <p>It is a coordinated response on behalf of all the contact persons you approached within our ministry, including Rijkswaterstaat.</p> <p>Rijkswaterstaat is responsible for managing the national road network, including the TEN-T road network in The Netherlands, and also including the road tunnels under the scope of directive 2004-54-EC.</p> <p>Note: please be aware of the possibility that other responses you might receive from contact persons you approached outside the ministry do not necessarily reflect our position and/or might not have the actual facts concerning the national road network (including the TEN-T road network) we manage.</p>
<p>Question 3. Please state your contact details (<i>name, telephone, email</i>).</p>	<p>Mr. drs. ing. A.J.F. Kapteijns Senior Policy Officer Sustainable Mobility Ministry of Infrastructure and The Environment The Netherlands</p>
<p>Question 4. Please answer all relevant questions in this questionnaire for the country you know best). On behalf of which country or to which country are your answers relevant? <i>Please state the country.</i></p>	<p>The Netherlands.</p>

1.4 Questions regarding potential issues with current legislation

In this section, we want you to state whether the outlined problems are relevant and adequate considering the country you know best. We would also like you to provide an assessment of the problems in terms of importance for your country. Feel free to provide examples or details of case studies to support your arguments.

The following section contains an overview of the main problems identified with the current EU regulatory framework for road infrastructure safety management. The problems were first identified in the ex-post evaluations of the directives and then further developed by the consortium.

The **main identified problem (Problem 1)** is the sub-optimal safety performance of the road and tunnel infrastructure network in EU.

This sub-optimal safety performance of road and tunnel infrastructure results in a higher number of crashes, fatalities and injuries compared to a more ideal situation with the same high safety performance of road infrastructure across EU.

*Remark by the respondent (member state The Netherlands):
It is not exactly clear what is meant here, because of multi interpretable wording. Our interpretation of the description of the above sentence is as follows:
"This sub-optimal safety performance of road and tunnel infrastructure results in a higher number of crashes, fatalities and injuries **as compared to a more ideal situation where the whole road infrastructure across the EU would have the same high safety performance**".*

Problem 2 relates to the unnecessary administrative burdens being levied upon the member states with two different yet complementary directives.

The Tunnel and RISM directives apply to different, but complementary parts of the TEN-T road network and there is thus a risk of unnecessary administrative burden. Roads and short tunnels are subject to the RISM directive; long tunnels are subject to the Tunnel directive. From an administrative point of view, this is not efficient. As there are two different directives it can be assessed that different staff has the responsibility which in turn increases the administrative burden.

Problem 3 relates to no internal market for road safety professionals

Road safety auditors and inspectors are trained to undertake inspections, audits and to make recommendations to increase road safety. There is no evidence that training is taking place in all countries, though. There is no internal market for road safety management resulting in less sharing of best-practice across Member States, limited competition and capacity limitations for carrying out necessary audits or inspections. The Directive does not impose the requirement that auditors are mutual recognized in other countries.

*Remark by the respondent (member state The Netherlands):
The wording above is again multi interpretable. When asked, it was explained by Mr. Kveiborg (COWI) during the final ECORoads workshop in Brussels (May 10th 2017) that the following is meant by "problem 3": "It is considered that it is difficult or even impossible for road safety auditors to work abroad i.e. to perform in other countries; this results in less sharing of best practices among member states."*

Question 1. In your view, to what extent do you think the three outlined problems are relevant considering the country you represent, on a scale of 1 (not at all relevant) to 5 (very relevant)? Moreover, how important do you think it is that this problem is dealt with through EU legislation in the area of road safety, on a scale of 1 (not at all important) to 5 (very important)? *Please fill in the table below.*

Problems	Rating on a scale of 1 (not at all relevant) to 5 (very relevant)	Rating on a scale of 1 (not at all important) to 5 (very important) in terms of EU action
1. Sub-optimal safety performance of road and tunnel infrastructure	1	1
2. Unnecessary administrative burden	1	1
3. No internal market for road infrastructure safety management	1	1

Notes by respondent (member state The Netherlands):

Problem 1: not relevant, because the safety performances of the road infrastructure in The Netherlands, including road tunnels, is high. For tunnels, we implemented stricter safety requirements than required by directive 2004-54-EC, to maintain the safety level we already acquired before the directive came into force. Given the enormous traffic density on the road network, this higher safety level is also important to assure the uninterrupted traffic flow, not hindered by the non-availability of the road in the tunnel because of incidents or calamities. Of course, we still aim for improvement of the safety performances, but this is well supported by the safety management principles of the directives. For RISM, we apply the Directive for all national roads and we have added the instrument Risks and Chances before the RIA stage.

We see no need to revise the Directives for these matters.

Problem 2: we don't recognize any unnecessary administrative burden because of two different directives. Road safety is integrated in tunnel safety and the tunnels are being designed, realized and managed in relation to the road network they are part of. The road safety experts and tunnel safety experts work together and coordinate. The safety officer of the tunnel monitors this, as this is his responsibility according to directive 2004-54-EC, since road safety is an integral part of tunnel safety, according to the scope of the directive. Therefore, the work load is not determined by the fact that there are 2 separate directives, it is determined by the work that has to be done to assure (road)safety.

Problem 3: we don't recognize this as a problem and certainly not as a problem related to the goals of the directives. It is not a goal of the directives to provide an international market for road safety auditors or inspectors. Moreover, best-practices are shared between member states through organizations like CEDR, PIARC and various other organized form of exchange of knowledge and experiences in the field of both road safety and road tunnel safety.

Question 2. Have you encountered other problems or issues with the current legislation than what is stated in the problems mentioned here? *Please describe these and rate these other problems in the text field below. Please ensure that you only enter one clearly defined issue per line.*

Problem	Directive (RISM / Tunnel)	Description	Rating on a scale of 1 (not at all relevant) to 5 (very relevant) – for your country	Rating on a scale of 1 (not at all important) to 5 (very important) in terms of EU action
Tunnel: no other issues.				
RISM: no other issues.				

Question 3. To what extent does the current legislative framework address these problems (To a large extent / To a fairly good extent / To some extent only / Not at all / Don't know)? *Please enter and rate any additional issues. Please ensure that you only enter one clearly defined issue per line.*

Problem	Directive (RISM / Tunnel)	To a large extent / To a fairly good extent / To some extent only / Not at all / Don't know
1. Sub-optimal safety performance of road infrastructure	RISM	To a large extent. By this we mean that the implementation of the directive enhances the safety performance and improvement effectively.
1. Sub-optimal safety performance of tunnel infrastructure	Tunnel	To a large extent. By this we mean that the implementation of the directive enhances the safety performance and improvement effectively.
2. Unnecessary administrative burden	RISM/Tunnel	To a large extent. By this we mean that the implementation of the directives does not lead to unnecessary administrative burden.
3. No internal market for road infrastructure safety management	RISM	This problem shouldn't be addressed in the RISM-directive (see answer to question 1).
OTHER: Please specify		

Question 4a. What are the main barriers (e.g. Drivers preventing) to ensure *an optimal safety performance of road infrastructure*? Please enter and rate any additional issues. Please ensure that you only enter one clearly defined issue per line.

Problems	Importance Rating on a scale of 1 (not at all important) to 5 (very important)	How much of the problem can be contributed to the driver in percentage (%)
Barrier/Driver A: Ineffective application of EU road infrastructure safety management legislation	1 (barrier A is not recognized; application of legislation is effective in The Netherlands)	0%
- Sub-driver: RISM and Tunnel directives are not fully applied in national legislation	1 (sub-driver is not recognized; directives are fully applied in the national legislation)	0%
- Sub-driver: National legislation too complex for practical use	1 (sub-driver is not recognized; after revision in 2013, the legislation on tunnel safety isn't complex anymore; the previous complexity was based on own choices and not introduced by directive 2004-54-EC. Legislation on road safety wasn't complex to begin with)	0%
Barrier/Driver B: Gaps and lack of clear requirements in in the legislation	1 (barrier B is not recognized; requirements in the legislation prove to be clear enough)	0%
- Sub-driver: Gaps in legislation (e.g. road authorities do not have to implement recommendations given in RISM procedures)	1 (sub-driver is not recognized; legislation works well)	0%
- Sub-driver: Lack of clear requirements in the legislation (e.g. very general definitions of procedures, and no minimum safety level required)	1 (sub-driver is not recognized; requirements in the legislation prove to be clear enough)	0%
-Sub-driver: RISM directive does not support the deployment infrastructure changes to support new road safety technologies	1 (sub-driver is not recognized; RISM-directive does not prevent or block the implementing of new road safety technologies; in The	0%

Problems	Importance Rating on a scale of 1 (not at all important) to 5 (very important)	How much of the problem can be contributed to the driver in percentage (%)
	Netherlands we regularly make use of new technologies)	
Barrier/Driver C: Non-TEN-T have too low safety standards	1 (Barrier C is not recognized; safety standards are not too low and the RISM-Directive is applied to all national roads)	0%
OTHER: Please specify		

Note by respondent (member state The Netherlands): as stated in the answer to question 1, we don't recognize the problem of suboptimal safety performance. Therefore we also don't recognize the barriers/drivers as factors leading to problems in the field of safety performance

Question 4b: Please support any assessment given above with specific cases or examples from your country or experience:

Not applicable.

Question 5a. What are the main barriers to ensure *no unnecessary burdens from the EU legislation on road safety? Please enter and rate any additional problem drivers / barriers. Please ensure that you only enter one clearly defined issue per line.*

Problems	Importance Rating on a scale of 1 (not at all important) to 5 (very important)	How much of the problem can be contributed to the driver in percentage (%)
Barrier/Driver A: The Directives require too much reporting and/administrative procedure	1 (Barrier A is not recognized; the directives don't require too much reporting because we use existing reports)	0%
Barrier/Driver B: The existence of two separate, but complementary directives require too much reporting	1 (Barrier B is not recognized; the existence of two separate directives don't require too much reporting)	0%
Other, please specify		

Question 5b: Please support any assessment given above with specific cases or examples from your country or experience:

Not applicable.

Question 6a. What are the main barriers to ensure an internal market for road safety audits in EU? *Please enter and rate any additional problem drivers / barriers. Please ensure that you only enter one clearly defined issue per line.*

Problems	Importance Rating on a scale of 1 (not at all important) to 5 (very important)	How much of the problem can be contributed to the driver in percentage (%)
Barrier/Driver A: A lack of common rules on recognition of auditor certificates between Member States	1 (Barrier A is not recognized; if this barrier exists, this is certainly not a problem to be solved by revision of the directive, since it has nothing to do with the goals of the directive)	0%
Barrier/Driver B: Road design is subjected to many national specific regulations and safety management procedures	1 (Barrier B is not recognized; the safety management procedures are standardized for the TEN-T road network; road design of the TEN-T road network is standardized to a certain degree through the European Agreement on Main International Traffic Arteries. The non-TEN-T road network should not be subject to European regulations. Differences in regulation don't necessarily result in unsafety. Moreover, national regulations are more capable of dealing with local circumstances.	0%
Exchange of knowledge	1 (We organized some specific trainings, seminars and workshops to learn from each other)	0%

Note: see answer to question 1

Question 6b: Please support any assessment given above with specific cases or examples from your country or experience:

There are no problems because we (CEDR, PIARC and bilateral) already organize regular meetings, workshops and seminars (e.g. 2015 Dublin) for exchanging knowledge between countries.

Question 7. Which elements/obligations of the current legislation are the most burdensome or complex and why? *Please ensure that you only enter one clearly defined issue per line.*

Directive (RISM / Tunnel)	Obligation	Why?
Not applicable. There are no obligations that are considered "burdensome".		

1.5 Baseline – no EU policy change

These questions regard the current situation, and expected development without revising the current legislation. Please provide references to studies or documents that you think are relevant to support your claims and provide links for online download where possible. Please answer these questions **country-specific**.

Table 1: Questions related to baseline and expected development without a revision of the current legislative framework

Questions	Answer			
Question 1. What approach to 'black spot' identification and/or management do you use in the country you represent? [Member States]	Network safety management consisting of a risk approach in combination with a reactive approach based on accidents. Nearly all Black Spots have been mitigated.			
Question 2. Reception of mobile devices in tunnels. Seen across all tunnels above 500 m, what is the level of coverage in the country you represent? [Member States]	No coverage		Limited coverage (e.g. only at entrances)	Good coverage throughout tunnel
				X (see notes below table)
Question 3. Other connectivity than mobile coverage in tunnels. Seen across all tunnels above 500 m, what is the level of coverage in the country you represent? [Member States]	Other means for connectivity	No coverage	Limited coverage (e.g. only at entrances)	Good coverage throughout tunnel
				X (see note below table)
Question 4a. How many times have the procedures RSI, RSIA, RSA and NSM been applied in the country you represent on TEN T roads in 2016? <i>Please indicate the year with latest available data in brackets if data are not available for 2016, if specific information is not available, please provide your best estimate.</i> [Member States]	Number of times each procedure has been applied on the TEN-T road network in 2016			
	Road Safety Inspections (RSIs)	Road Safety Impact Assessments (RSIAs)	Road Safety Audits (RSAs)	Network Safety Management (NSM)
	About 40	About 15	About 60	1
Question 4b. How many certified road safety auditors and inspectors are there in the country you represent? [Member States]	RSA: 13 RSI: 4			
Question 5. To what extent do you experience problems with recommendations from RSI, RSIA, RSA and NSM are being followed up in the country you represent? <i>Please provide your best estimate if accurate figures are not available</i> [Member States] (there are no problems)	Share of recommendations that are followed up			
	Road Safety Inspections (RSIs)	Road Safety Impact Assessments (RSIAs)	Road Safety Audits (RSAs)	Network Safety Management (NSM)
	80%	90%	90%	90%
Question 6. Are there any plans for increasing activity regarding RSI, RSIA, RSA and NSM in in the country you represent? <i>Please elaborate and provide links, case studies or other material to support your argument.</i> [Member States]	No.			

<p>Question 8. To what extent are the procedures RSI, RSIA, RSA and NSM implemented in the country you represent on <u>non-TEN-T</u> roads? <i>If you are unable to give a share, please use the following scale: "Fully", "Partly" or "Not at all".</i> [Member States]</p>	<p>Implemented beyond TEN-T road network (share of non-TEN-T roads that are covered)</p>			
	<p>Road Safety Inspections (RSIs)</p>	<p>Road Safety Impact Assessments (RSIAs)</p>	<p>Road Safety Audits (RSAs)</p>	<p>Network Safety Management (NSM)</p>
	<p>Fully</p>	<p>Fully</p>	<p>Fully</p>	<p>Fully</p>
<p>Question 9 Are there any current plans for extending the road safety Directive beyond TEN-T in the country you represent? [Member States]</p>	<p>Has already been done. The RISM-directive is applied to all National roads in The Netherlands.</p>			
<p>Question 9A If yes, how large a share of the non-TEN-T roads will be covered in the country you represent in 2030? [Member States]</p>	<p>Implemented beyond TEN-T road network (share of non-TEN-T roads that are covered) in 2030</p>			
	<p>Road Safety Inspections (RSIs)</p>	<p>Road Safety Inspections (RSIs)</p>	<p>Road Safety Inspections (RSIs)</p>	<p>Road Safety Inspections (RSIs)</p>
	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>Question 10. Are you aware of any specific barriers for use of road safety auditors from other MS in the country you represent? <i>Please elaborate and provide links, examples or other material to support your argument.</i> [Member States]</p>	<p>No, we don't see any problem. There are regular seminars, workshops, bilateral meetings to exchange knowledge between countries. If this will be regular, we will set conditions like specific knowledge about our guidelines.</p>			
<p>Question 10A. Has the country you represent provided any initiatives to ensure free cross-border mobility of road safety auditors or are there any plans for this? <i>Please elaborate and provide links, case studies or other material to support your argument.</i> [Member States]</p>	<p>No, it is the responsibility of the market to take action.</p>			
<p>Question 11. Does the country you represent communicate information of safety performance of roads to road users?</p>	<p>Share of TEN-T road network with information of safety performance of roads</p>		<p>Share of non-TEN-T road network with information of safety performance of roads</p>	
	<p>100%</p>		<p>100% of national non-TEN-T roads</p>	
<p>If so how? [Member States]</p>	<p>By means of the yearly report "Safe over National roads" (in Dutch: "Veilig over Rijkswegen").</p>			
<p>Question 11A Have you any experience with how information of safety performance of roads to road users effect road safety? <i>Please elaborate and provide links, case studies or other material to support your argument.</i> [Experts]</p>	<p>No, we use this public report for our programming of cost-effective measures. The Newspapers will publish about the road safety of the national roads. We don't evaluate the safety effect of providing performance information to the road users directly.</p>			
<p>Question 12. How do you ensure and improve safety for vulnerable road users in the country you represent on the TEN-T road network? <i>Please provide examples and suggestion for further research.</i></p>	<p>It is forbidden for pedestrians, bicyclists and moped riders to use the TEN-T roads. For the motorcyclists we improve the guardrails in curves with motor friendly guardrails.</p>			

[Member States]	
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Notes by respondent (member state The Netherlands) to question 2:

- Reception for mobile phones of the road/tunnel users is not considered necessary for tunnel safety reasons. For starters, using mobile phones while driving is not safe, not even in case of a hands free usage. Further more, in case of emergency, the added value of mobile phones is limited or even counterproductive, taking into account that directive 2004-54-EC already requires emergency phones to be available in the tunnel. The advantage of an emergency phone is, that one is able to get contact with the tunnel operator directly. Hence, the tunnel operator knows where the person is and takes a direct focused action, if necessary. A call by a mobile phone does not reach the tunnel operator directly, hence, time is lost. Moreover, the person involved often can't describe his location in a clear way, he often doesn't know where he is exactly (which tunnel tube, what location in the tube, etc.). However, if a provider wishes coverage in the tunnel for his mobile phone network, we support him to take the measures necessary to provide the coverage. Hence, in practice, a full coverage is available in all our tunnels (a few exceptions might exist). In all cases, the providers finance and maintain their own systems in coordination with the tunnel manager, but the tunnel manager is not responsible for the systems.
- As part of the standard safety measures, and as required by directive , we do provide a full coverage in the tunnel for the communication system "C2000", that is used by the emergency response services. The system allows the use of Portable phones, using designated channels.

Note by respondent (member state The Netherlands) to question 3: we are not sure what is meant by "other connectivity than mobile coverage", but, as mentioned, there are emergency phones available in the tunnels, as required by the directive. The emergency phones are located in the emergency station cabinets, usually available every 50m or so, on both sides of the road.

1.6 Formulation of options

In order to address the problems identified in Section 1.4, the European Commission is considering a number of possible policy options as part of the Impact Assessment study.

The following box list the tentative policy options.

Option 1: Legislative change to the Directives with a view to clarifying the definitions of procedures, reporting obligations and requirements for mutual acceptance of road auditor certificates, updating the minimum safety requirements for the road tunnels including a request for mobile communication coverage in all TEN-T tunnels. No extension of scope beyond the TEN-T.

Question by respondent (member state The Netherlands): does "all TEN-T tunnels" also include tunnels shorter than 500m? This would imply an enlargement of the current scope of directive 2004-54-EC. We strongly oppose to this.

Option 2: In addition to **Option 1**, a more substantial legal revision of the existing legislation compared to Option 1. Measures aimed at increasing the protection of vulnerable road users (pedestrians, bicyclists, moped riders and motorcyclists), the promotion of innovative techniques and standards for road construction, road equipment and road markings, the measurement of the quality and consistency of road signings and road markings and the measurement of the safety performance of roads, and more information exchange between professionals. Furthermore, this option includes establishing standards for certain road infrastructure elements or making their use mandatory. No extension of scope beyond the TEN-T.

Option 3: In addition to **Option 2** extending the scope of EU intervention by setting minimum safety performance requirements for the roads that are part of the TEN-T road network, to include tunnels longer than 500 m in the RISM directive and to make the recommendations of the RSI, RSA, RSIA and NSM mandatory on TEN-T roads. No extension of scope beyond the TEN-T.

Option 4a: In addition to **Option 2** extending the scope of EU intervention by including in the scope of the road infrastructure safety management Directive also national roads that are not part of the TEN-T while respecting the principle of subsidiarity.

Option 4b: In addition to **Option 3** extending the scope of EU intervention by including in the scope of the road infrastructure safety management Directive also national roads that are not part of the TEN-T while respecting the principle of subsidiarity.

Sub-option: Merging of the two Directives to achieve a comprehensive approach to the management of road infrastructure safety.

The questions in this section aim to gain your views on:

- > potential additional measures included or excluded from the options
- > the appropriateness of these option

Please provide references to studies or documents that you think are relevant to support your claims and provide links for online download where possible.

Please answer these questions **country**-specific.

Table 2: Questions related to the formulation of options, and suggestions for further measures to be included in the options.

Questions	Answer		Tunnel directive	
		RISM directive		
<p>Question 1. Are any of the proposed options redundant/inadequate, when considering the country you represent – due to e.g. national legislation? <i>Please elaborate on why these should be excluded from the project and support your claim.</i> [Member States]</p>	Option 1	<p>No added value and/or redundant/inadequate (see previous answers). Definitions in the directive are clear enough and represent a good balance between standardization and flexibility, that is, room needed for member states to tailor the requirements to the national situation and regulation. Making the requirements more detailed is most probably counter-productive and would probably lead to more administrative burdens, while one of the goals of a possible revision of the directive would be to lower the administrative burden. Moreover, we don't see any need to update the minimum requirements. We've already implemented more than required by the directive (all national roads + Instrument Risks and chances).</p>	Option 1	<p>No added value and/or redundant/inadequate (see previous answers). Definitions in the directive are clear enough and represent a good balance between standardization and flexibility, that is, room needed for member states to tailor the requirements to the national situation and regulation. Making the requirements more detailed is most probably counter-productive and would probably lead to more administrative burdens, while one of the goals of a possible revision of the directive would be to lower the administrative burden. Moreover, we don't see any need to update the minimum requirements. We've chosen stricter requirements for some provisions, for reasons explained before, but it is our firm conviction that this choice should be up to the member states. The directive already invites member states to consider to do more than the minimum requirements. This is sufficient (also since many member states already have problems complying to the present requirements). Finally, as stated before, we believe the added value of requiring mobile communication coverage for road users in TEN-T road tunnels is limited.</p>
	Option 2	<p>No added value and/or redundant/inadequate, see answer to question 1. Additional comments: there are nearly no pedestrians, cyclists and moped riders on the TEN-T road network. The suggested promotion of innovative techniques is already a habit in The Netherlands. The measurement of the quality of road signings and road markings is already part of the monitoring. The road safety performance of the roads is part of our safety system and we started to evaluate the risks. The exchange of knowledge is part of our European collaboration. We don't want to establish standards for certain road elements.</p>	Option 2	<p>No added value and/or redundant/inadequate, see answer to question 1. Additional comments: the suggested promotion of innovative techniques is already implemented in the current directive 2004-54-EC, see article 14. However, the required procedure to actually implement alternative or innovative solutions might be considered as "heavy", thus preventing such solutions in practice. In our practice, we haven't encountered situations in which we would have wanted to implement alternative measures instead of the required measures by the directive. This is another indication that the directive is quite fitting as it is.</p>
	Option 3	<p>No added value and/or redundant/inadequate, see answers to questions 1 and 2. Additional comments: Since, in The Netherlands, the official advise of the safety officer plays an important role</p>	Option 3	<p>No added value and/or redundant/inadequate, see answers to questions 1 and 2. Additional comments: including tunnels longer than 500m in the RISM-directive is counter-productive and will raise the administrative burden, while the</p>

		<p>in the acquisition of the building permit and the opening permit for a tunnel, it is best to keep tunnels longer than 500m outside the scope of the RISM-directive and to keep the Safety officer in the position to give an integral advice to the tunnel manager. Of course, it is possible to use the instruments like RSIAs, RSAs, etc. to advice on road safety within the context/frame of the road tunnel safety directive. If there is a need to assure this, it is our firm believe that this should be done by "soft regulations", for instance, to point out the possible use of the "PIARC-recommendation regarding the approach to take into account Directive 2008/96/EC in the context of road tunnels", dated 6/11/2013.</p> <p>The process to be described (again, as soft regulation, preferably in both directives) should be that the road safety auditor or inspector reports his findings about the audit/inspection of the tunnel (including the transition areas) to the safety officer of the tunnel. The task of the auditor/inspector ends there. The safety officer will make recommendations about the actions to be done to solve the problems and reports these recommendations to the tunnel manager. The tunnel manager decides.</p>	<p>goal of a possible revision of the directives should be to lower the administrative burden.</p> <p>When the RISM-directive was introduced, tunnels longer than 500m in the TEN-T road network were rightfully excluded from the scope, because road safety was already included in the scope of the tunnel safety directive 2004-54-EC, because road safety is an integral part of tunnel safety. According to the directive, it is the responsibility of the safety officer to give the tunnel manager integrated safety recommendations, that is, tunnel safety including road safety (see, for example, point 1.1.1 in Annex 1). Therefore, the coordination between tunnel safety and road safety is already assured. It would be counterproductive to have dual safety management systems (directives) in action concerning the same aspect. Moreover, this would make the regulations far more complex than they are now, with higher administrative burdens and, moreover the risk of contradicting advises on road safety in and near the tunnel. Since, in The Netherlands, the official advise of the safety officer plays an important role in the acquisition of the building permit and the opening permit for a tunnel, such contradicting advises would result in unnecessary discussions and delays, thus resulting in unnecessary societal costs. Therefore, it is best to keep tunnels longer than 500m outside the scope of the RISM-directive and to keep the Safety officer in the position to give an integral advice to the tunnel manager. Of course, it is possible to use the instruments like RSIAs, RSAs, etc. to advice on road safety within the context / frame of the road tunnel safety directive. If there is a need to assure this, it is our firm believe that this should be done by "soft regulations", for instance, to point out the possible use of the "PIARC-recommendation regarding the approach to take into account Directive 2008/96/EC in the context of road tunnels", dated 6/11/2013. The process to be described (again, as soft regulation, preferably in both directives) should be that the road safety auditor or inspector reports his findings about the audit/inspection of the tunnel (including the transition areas) to the safety officer of the tunnel. The task of the auditor/inspector ends there. The safety officer will make recommendations about the actions</p>
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				to be done to solve the problems and reports these recommendations to the tunnel manager. The tunnel manager decides.
	Option 4a	See answer to option 2. Additional comments: The National roads outside the TEN-T are already included and implemented within our RISM.	Option 4a	Is the same as option 2, as far as directive 2004-54-EC is concerned; see previous comments.
	Option 4b	See answer to option 3. Additional comments: The National roads outside the TEN-T are already included within our RISM.	Option 4b	Is the same as option 3, as far as directive 2004-54-EC is concerned; see previous comments.
Question 2. Do you have any further suggestions for improving the provisions within the current legislation – based on national legislation in your country? <i>Please elaborate and provide links, case studies or other material to support your argument</i> [Member States]	Option 1	No.	Option 1	No.
	Option 2	No.	Option 2	No.
	Option 3	No.	Option 3	No.
	Option 4a	No.	Option 4a	No.
	Option 4b	No.	Option 4b	No.
Question 3. Are any of the options or measures presented in the above box covered by your national legislation? And to how large an extent? <i>Please elaborate and answer per relevant option.</i> [Member States]	Option 1	When applicable / necessary, the definitions of procedures and reporting obligations are described in more detail in our national legislation.	Option 1	When applicable / necessary, the definitions of procedures and reporting obligations are described in more detail in our national legislation. Furthermore, some of the safety requirements are stricter than the minimum requirements in the directive. In our legislation, there is no distinction between TEN-T road tunnels and non-TEN-T road tunnels: the same general requirements apply to all road tunnels longer than 250m. For new to be built state owned road tunnels (including TEN-T tunnels) longer than 250m, even more detailed requirements apply, including performance requirements for every mandatory safety measure. In other words, we have a legally standardized tunnel equipment for new state owned road tunnels and a vast design standard (in Dutch: "Landelijke Tunnelstandaard") to deploy the legal requirements in a design that meets the policy of Rijkswaterstaat to assure a safe and continuous traffic flow (*). For reasons explained earlier, a coverage in a

				tunnel for mobile phone communication by road users is not mandatory.
	Option 2	No.	Option 2	Not applicable.
	Option 3	No.	Option 3	Not applicable.
	Option 4a	The RISM is applied on all national roads and is covered by national legislation.	Option 4a	Not applicable.
	Option 4b	The RISM is applied on all national roads and is covered by national legislation.	Option 4b	Not applicable.

(*) The "Landelijke Tunnelstandaard" can be downloaded here (in Dutch):
<https://www.rijkswaterstaat.nl/zakelijk/werken-aan-infrastructuur/bouwrichtlijnen-infrastructuur/aanleg-tunnels/landelijke-tunnelstandaard/index.aspx>

1.7 Effects and impacts of policy options

We will ask you to reflect on the effects and impacts from the policy options on traffic safety, economic cost of implementing the option and finally the administrative burden of implementing and governing the new legislation.

Please provide case studies and information for the individual measures to support your claim (which measures will contribute with which effect).

Please answer these questions **country**-specific.

Question 1. To what extent do you think the specific policy option will have an impact in your country, on a scale of 1 (no impact at all) to 10 (very high impact)? *Please provide a rating for each policy option and target variable.* [Member States] and [Experts]

	Safety level on roads		Safety level in tunnels		Level of competition / mobility in the Road Auditor sector
	(no. of accidents)	(severity. of accidents)	(no. of accidents)	(severity. of accidents)	
Option 1	1	1	1	1	1
Option 2	1	1	1	1	1
Option 3	1	1	1	1	1
Option 4A	2	2	1	1	1
Option 4B	1	1	1	1	1

Option 1: Legislative change to the Directives with a view to clarifying the definitions of procedures, reporting obligations and requirements for mutual acceptance of road auditor certificates, updating the minimum safety requirements for the road tunnels including a request for mobile communication coverage in all TEN-T tunnels. No extension of scope beyond the TEN-T.

This includes the following specific measures:

- > The definitions of procedures and the reporting obligations should be clarified and updated in the RISM directive
- > The minimum safety requirements for the road tunnels in the TEN-T network should be updated in tunnel directive
- > To ensure better communication in tunnels by legislative changes in tunnel Directive requiring mobile coverage in all TEN-T tunnels.
- > Examples on best practice for road safety management practices to be included in both directives (e.g. as an appendix); e.g. using proposed RSI methodologies)
- > Obligation for MS to report and publish the recommendations that are not followed up on
- > Highlighting the real benefits for road safety in the Directives / through a campaign

Table 3: Questions related to effects and impacts from the policy option 1

Questions	Answer
Question 1A. In your view, what are the largest barriers (e.g. financial, policy or measure related, operational) to implement Option 1 in your country? <i>Please provide links, case studies or other material to</i>	The largest barrier would be the enormous administrative burdens connected by the revision of the legislation without any substantial added value to compensate for this.

Questions	Answer																		
<p>support your argument. [Member States] and [Experts]</p>																			
<p>Question 1B. In your view, what would be the impacts of Option 1 on traffic safety (number or %-change in terms of accident rate and accident severity) of implementing Option 1 in your country? <i>Feel free to elaborate on which of the included measures that provides which effect on e.g. accident rate. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	<p>No relevant impact on safety. It is difficult to answer and to judge because the 6 items differ a lot.</p>																		
<p>Question 1C-1. In your view, what would be the economic costs of implementing Option 1 in your country? <i>Please insert additional lines if relevant.</i> [Member States] and [Experts]</p>	Economic cost																		
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #f4a460;">Economic cost category (e.g. in terms of infrastructure investment cost)</th> <th style="background-color: #f4a460;">Total investment cost, EUR</th> <th style="background-color: #f4a460;">Annual cost after investment (e.g. annual running/maintenance cost), EUR</th> </tr> </thead> <tbody> <tr> <td>Administrative burdens connected by the revision of the legislation</td> <td>Very high costs, difficult to estimate in this stage</td> <td>Depending on extra administrative burdens as compared to current situation, resulting from proposed "clarifications".</td> </tr> <tr> <td>Infrastructure investments</td> <td>No investments expected, given the current high safety performance of the road network and the fact that national legislation on tunnel safety is much stricter than required by the directive.</td> <td>Not applicable.</td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR	Administrative burdens connected by the revision of the legislation	Very high costs, difficult to estimate in this stage	Depending on extra administrative burdens as compared to current situation, resulting from proposed "clarifications".	Infrastructure investments	No investments expected, given the current high safety performance of the road network and the fact that national legislation on tunnel safety is much stricter than required by the directive.	Not applicable.									
	Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR																
	Administrative burdens connected by the revision of the legislation	Very high costs, difficult to estimate in this stage	Depending on extra administrative burdens as compared to current situation, resulting from proposed "clarifications".																
	Infrastructure investments	No investments expected, given the current high safety performance of the road network and the fact that national legislation on tunnel safety is much stricter than required by the directive.	Not applicable.																
<p>Question 1C-2. Please elaborate on your above answer regarding the economic cost of implementing option 1. <i>Feel free to describe each cost category and divide the economic cost on the individual measures. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	<p>See above.</p>																		

Questions	Answer		
<p>Question 1D-1. In your view, what would be the additional administrative and regulatory cost compared to the baseline if Option 1 was implemented in your country? <i>Please insert additional lines if relevant. If no specific amount exists, please answer using % of e.g. constructions costs or other approaches used to assess the magnitude of the costs [Member States] and [Experts]</i></p>	Additional administrative and regulatory cost		
	Administrative and regulatory cost category (e.g. in terms of hours implementing/ the new directive)	Total implementation cost, EUR/hours	Annual cost after implementation, EUR/hours
	See question 1C-1	See question 1C-1	See question 1C-1
<p>Question 1D-2. Please elaborate on your above answer regarding the additional administrative and regulatory cost when implementing option 1. <i>Feel free to describe each cost category, elaborate on which measures that provides which administrative costs and what the size of these are. Please provide links, case studies or other material to support your argument. [Member States] and [Experts]</i></p>	See above.		

Option 2: In addition to **Option 1**, a more substantial legal revision of the existing legislation compared to Option 1. Measures aimed at increasing the protection of vulnerable road users (pedestrians, bicyclists, moped riders and motorcyclists), the promotion of innovative techniques and standards for road construction, road equipment and road markings, the measurement of the quality and consistency of road signings and road markings and the measurement of the safety performance of roads, and more information exchange between professionals. Furthermore, this option includes establishing standards for certain road infrastructure elements or making their use mandatory. No extension of scope beyond the TEN-T.

This includes the following specific measures (**in addition** to the measures shown under option 1):

- > Establishing a practice through the directives in which technical standards for design, construction and maintenance are developed to meet the needs of VRU in general
- > To include in Directive measures to adopt roads to meet technological changes and innovations in vehicle technology including promotion of innovative techniques and standards for road construction, road equipment and road markings, the measurement of the quality and consistency of road signings and road markings.
- > Include in the Directive requirements regarding harmonisation of the quality of road infrastructure across the TEN-T road network (self-explaining roads) including a clear actual road safety level of the roads.
- > Secure free movement of road auditors and inspectors between member states in the RISM Directive.
- > To supplement the existing RISM directive with more information exchange between professionals.

Table 4: Questions related to effects and impacts from the policy option 2

Questions	Answer
<p>Question 2A. In your view, what are the largest barriers (e.g. financial, policy or measure related, operational) to implement Option 2 in your country? Please provide links, case studies or other material to support your argument. [Member States] and [Experts]</p>	<p>The largest barrier would be the policy and extra administrative burdens connected by the revision of the legislation without any substantial added value to compensate for this. Also the principle of subsidiarity is important.</p>
<p>Question 2B. In your view, what would be the impacts of Option 2 on traffic safety (no. or %-change in terms of accident rate and accident severity) of implementing Option 2 in your country? Feel free to elaborate on which of the included measures that provides which effect on e.g. accident rate. Please provide links, case studies or other material to support your argument. [Member States] and [Experts]</p>	<p>Taking into account only the possible/acceptable measures: no impact.</p>
<p>Question 2C-1. In your view, what would</p>	<p>Economic cost</p>

Questions	Answer		
<p>be the economic costs of implementing Option 2 in your country? <i>Please insert additional lines if relevant.</i> [Member States] and [Experts]</p>	Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR
	See 2B: low	See 2B: low	See 2B: low
<p>Question 2C-2. Please elaborate on your above answer regarding the economic cost of implementing option 2. <i>Feel free to describe each cost category and divide the economic cost on the individual measures. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	Nothing more		
<p>Question 2D-1. In your view, what would be the additional administrative and regulatory cost compared to the baseline if Option 1 was implemented in your country? <i>Please insert additional lines if relevant. If no specific amount exists, please answer using % of e.g. constructions costs or other approaches used to assess the magnitude of the costs</i> [Member States] and [Experts]</p>	Additional administrative and regulatory cost		
	Administrative and regulatory cost category (e.g. in terms of hours implementing/ the new directive)	Total implementation cost, EUR/hours	Annual cost after implementation, EUR/hours
	Difficult to guess	Difficult to guess	Difficult to guess
<p>Question 2D-2. Please elaborate on your above answer regarding the additional administrative and regulatory cost when implementing option 2. <i>Feel free to describe each cost category, elaborate on which measures that provides which administrative costs and what the size of these are. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	Difficult to guess		

Option 3: In addition to **Option 2** extending the scope of EU intervention by setting minimum safety performance requirements for the roads that are part of the TEN-T road network, to include tunnels longer than 500 m in the RISM directive and to make the recommendations of the RISM directive mandatory on TEN-T roads. No extension of scope beyond the TEN-T.

This includes the following specific measures (**in addition** to the measures shown under option 2):

- > To supplement the existing RISM directive with minimum safety performance requirements for the roads that are part of the TEN-T road network.
- > Extend RISM directive to cover road safety issues in tunnels longer than 500 m
- > The recommendations in the RISM directive to be mandatory on TEN-T roads
- > Include specification of preferred standards/ methodology in Directive 2008/98/EC.

Table 5: Questions related to effects and impacts from the policy option 3

Questions	Answer									
<p>Question 3A. In your view, what are the largest barriers (e.g. financial, policy or measure related, operational) to implement Option 3 in your country? Please provide links, case studies or other material to support your argument. [Member States] and [Experts]</p>	<p>Again, the largest barrier would be the enormous administrative burdens connected by the revision of the legislation without any substantial added value to compensate for this.</p> <p>Even worse than with option 1 and 2, the inclusion of tunnels longer than 500m in the RISM-directive would lead to a complex situation with two parallel safety management systems, that are likely to be counterproductive, including the risk of contradicting safety advises, hindering the legal decision making process surrounding the acquisition of the building permit and the opening permit for the tunnel.</p> <p>Our policy doesn't accept several measures, like minimum road safety performance requirements.</p>									
<p>Question 3B. In your view, what would be the impacts of Option 3 on traffic safety (no. or %-change in terms of accident rate and accident severity) of implementing Option 3 in your country? Feel free to elaborate on which of the included measures that provides which effect on e.g. accident rate. Please provide links, case studies or other material to support your argument. [Member States] and [Experts]</p>	<p>No relevant impact on safety.</p>									
<p>Question 3C-1. In your view, what would be the additional administrative and regulatory cost compared to the baseline if Option 3 was implemented in your country? Please insert additional lines if relevant. If no specific amount exists, please answer using % of e.g. constructions costs or other approaches used to assess the magnitude of the costs [Member States] and [Experts]</p>	<p>Economic cost</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #f4a460;"> <th style="text-align: left;">Economic cost category (e.g. in terms of infrastructure investment cost)</th> <th style="text-align: center;">Total investment cost, EUR</th> <th style="text-align: center;">Annual cost after investment (e.g. annual running/maintenance cost), EUR</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;">Administrative burdens connected by the revision of the legislation</td> <td style="vertical-align: top;">Very high costs, difficult to estimate in this stage</td> <td style="vertical-align: top;">Risk of continuous high societal costs, because of the risk mentioned in the answer to question 3A, resulting in project delays.</td> </tr> <tr> <td style="vertical-align: top;">Infrastructure investments</td> <td style="vertical-align: top;">No investments expected, given the</td> <td style="vertical-align: top;">Not applicable.</td> </tr> </tbody> </table>	Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR	Administrative burdens connected by the revision of the legislation	Very high costs, difficult to estimate in this stage	Risk of continuous high societal costs, because of the risk mentioned in the answer to question 3A, resulting in project delays.	Infrastructure investments	No investments expected, given the	Not applicable.
Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR								
Administrative burdens connected by the revision of the legislation	Very high costs, difficult to estimate in this stage	Risk of continuous high societal costs, because of the risk mentioned in the answer to question 3A, resulting in project delays.								
Infrastructure investments	No investments expected, given the	Not applicable.								

Questions	Answer		
		current high safety performance of the road network and the fact that national legislation on tunnel safety is much stricter than required by the directive.	
<p>Question 3C-2. Please elaborate on your above answer regarding the economic cost of implementing option 3. <i>Feel free to describe each cost category and divide the economic cost on the individual measures. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	See above.		
<p>Question 3D-1. In your view, what would be the additional administrative and regulatory cost compared to the baseline if Option 3 was implemented in your country? <i>Please insert additional lines if relevant. If no specific amount exists, please answer using % of e.g. constructions costs or other approaches used to assess the magnitude of the costs</i> [Member States] and [Experts]</p>	Additional administrative and regulatory cost		
	Administrative and regulatory cost category (e.g. in terms of hours implementing/ the new directive)	Total implementation cost, EUR/hours	Annual cost after implementation, EUR/hours
	See question 3C-1	See question 3C-1	See question 3C-1
<p>Question 3D-2. Please elaborate on your above answer regarding the additional administrative and regulatory cost when implementing option 3. <i>Feel free to describe each cost category, elaborate on which measures that provides which administrative costs and what the size of these are. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	See above.		

Option 4a and 4b: In addition to **Option 2** and **Option 3** extending the scope of EU intervention by including in the scope of the road infrastructure safety management Directive also national roads that are not part of the TEN-T.

This includes the following specific measures (**in addition** to the measures shown under option 2 and option 3):

- > Directives to be compulsory on non-TEN-T national roads.

Table 6: Questions related to effects and impacts from the policy option 4a and 4b

Questions	Answer																					
<p>Question 4A. In your view, what are the largest barriers (e.g. financial, policy or measure related, operational) to implement Option 4a and 4b in your country? <i>Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	<p>European regulations should not include non-TEN-T national roads, since these are a national matter (subsidiarity) .</p> <p>In The Netherlands the non-TEN-T national roads are already included.</p>																					
<p>Question 4B. In your view, what would be the impacts of Option 4a and 4b on traffic safety (no. or %-change in terms of accident rate and accident severity) of implementing these options in your country? <i>Feel free to elaborate on which of the included measures that provides which effect on e.g. accident rate. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	<p>No relevant impact on safety.</p>																					
<p>Question 4C-1. In your view, what would be the additional administrative and regulatory cost compared to the baseline if Options 4a and 4b were implemented in your country? <i>Please insert additional lines if relevant. If no specific amount exists, please answer using % of e.g. constructions costs or other approaches used to assess the magnitude of the costs</i> [Member States] and [Experts]</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #f4a460;"> <th colspan="3" style="text-align: center;">OPTION 4a - Economic cost</th> </tr> <tr> <th style="width: 33%;">Economic cost category (e.g. in terms of infrastructure investment cost)</th> <th style="width: 33%;">Total investment cost, EUR</th> <th style="width: 33%;">Annual cost after investment (e.g. annual running/maintenance cost), EUR</th> </tr> </thead> <tbody> <tr> <td>See option 2 for option 4a; see option 3 for option 4b.</td> <td>See option 2 for option 4a; see option 3 for option 4b.</td> <td>See option 2 for option 4a; see option 3 for option 4b.</td> </tr> <tr> <td> </td> <td> </td> <td> </td> </tr> <tr style="background-color: #f4a460;"> <th colspan="3" style="text-align: center;">OPTION 4b - Economic cost</th> </tr> <tr> <th style="width: 33%;">Economic cost category (e.g. in terms of infrastructure investment cost)</th> <th style="width: 33%;">Total investment cost, EUR</th> <th style="width: 33%;">Annual cost after investment (e.g. annual running/maintenance cost), EUR</th> </tr> <tr> <td>See option 2 for option 4a; see option 3 for option 4b.</td> <td>See option 2 for option 4a; see option 3 for option 4b.</td> <td>See option 2 for option 4a; see option 3 for option 4b.</td> </tr> </tbody> </table>	OPTION 4a - Economic cost			Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.				OPTION 4b - Economic cost			Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.
OPTION 4a - Economic cost																						
Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR																				
See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.																				
OPTION 4b - Economic cost																						
Economic cost category (e.g. in terms of infrastructure investment cost)	Total investment cost, EUR	Annual cost after investment (e.g. annual running/maintenance cost), EUR																				
See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.																				

Questions	Answer		
<p>Question 4C-2. Please elaborate on your above answer regarding the economic cost of implementing option 4a and 4b. <i>Feel free to describe each cost category and divide the economic cost on the individual measures. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	See above.		
<p>Question 4D-1. In your view, what would be the additional administrative and regulatory cost compared to the baseline if Options 4a and 4b were implemented in your country? <i>Please insert additional lines if relevant. If no specific amount exists, please answer using % of e.g. constructions costs or other approaches used to assess the magnitude of the costs</i> [Member States] and [Experts]</p>	Option 4a - Additional administrative and regulatory cost		
	Administrative and regulatory cost category (e.g. in terms of hours implementing/ the new directive)	Total implementation cost, EUR/hours	Annual cost after implementation, EUR/hours
	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.
	Option 4b - Additional administrative and regulatory cost		
	Administrative and regulatory cost category (e.g. in terms of hours implementing/ the new directive)	Total implementation cost, EUR/hours	Annual cost after implementation, EUR/hours
	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.	See option 2 for option 4a; see option 3 for option 4b.
<p>Question 4D-2. Please elaborate on your above answer regarding the additional administrative and regulatory cost when implementing option 4a and 4b. <i>Feel free to describe each cost category, elaborate on which measures that provides which administrative costs and what the size of these are. Please provide links, case studies or other material to support your argument.</i> [Member States] and [Experts]</p>	See above.		

Sub-option: Merging of the two Directives.

Table 7: Questions related to effects and impacts from merging the two Directives

Questions	Yes/no/don't know	Please elaborate
<p>Question 6. Do you foresee any impact in terms of administrative and regulatory costs (positive or negative) of merging the two Directives into a single piece of legislation creating a single regulatory framework for the TEN-T road network including tunnels when considering the country you know best? Please elaborate. [Member States]</p>	Yes.	See answers to questions relating to option 3.
<p>Question 7. Do you believe that the directives should be merged into a single piece of legislation? And why? [Member States]</p>	No.	Same disadvantages / risks as with option 3. Moreover, the merging would be "window dressing", since this would neither reduce the number of regulations, nor the administrative burdens (most probably this would result in higher administrative burdens).

1.8 Closure

Table 8: Closing questions

Questions	Answer
<p>Question 1. Please provide a link or information on any successful initiatives at regional, national or international level related to road safety measures that could support the impact assessment. [Member States] and [Experts]</p>	<p>Framework Road safety 2017 More than 200 Audit reports</p>
<p>Question 2. If there is any additional issue, you wish to raise in this context, please provide us with a general case assessment. [Member States] and [Experts]</p>	Not applicable.

If you have any questions please contact: Troels Nybro Hansen or Ole Kveiborg

Please return the questionnaire to the contact person as soon as possible and not later than 26 May, 2017.