01-MP-06

# Stakeholders consultation

## Road Infrastructure Safety Management on The Trans European Networks.

## Comments and Response from the European Motorcycle Industry (ACEM)

### Introduction

ACEM is the trade association for the European motorcycle industry. The motorcycle industry business in Europe is worth Euro 10billion to the European economy and employs 200,000 people covering all members states. In 2005, 2.5million powered two wheelers (PTWs) of all kinds were sold, and it can be noted from statistics that the sales and use of PTWs has seen a steady increase in recent years.

ACEM acknowledges the communication of the Commission on its consultation on Road Infrastructure Safety Management on the Trans European Networks and is pleased to provide a response to the call for comments, particularly as the proposals relate to the relationship between roads infrastructure and vulnerable modes such as Powered Two Wheelers.

This response is in two parts.

1. General commentary on the industry's involvement in transport infrastructure safety and the European Commission's policy options
2. A response to the specific questions asked by the European Commission on page six of the consultation document

### 1. Background, General Comments and the Policy Options

ACEM believes that a safer road environment is fundamental to powered two wheeler (PTW) safety in the Community. Poor standards of road maintenance, a lack of highways engineering standards, a lack of infrastructure audits and inspections, very little black spot management, poorly designed roads, poorly designed and placed road furniture contributes to a hazardous and vulnerable road environment for two wheeled vehicles such as PTWs and bicycles and for pedestrians.

**Association des Constructeurs Européens de Motocycles**
Internet : www.acembike.org – e-mail : acembike@acembike.org
1 avenue de la Joyeuse Entrée – B 1040 Bruxelles
Tél. +32 2 23 97 32 – Fax +32 2 230 16 83
R.G.E.I.E. Bruxelles : 139

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The MAIDS[1] study, which was conducted by ACEM in partnership with the European Commission and motorcycling organisations identified the road environment and infrastructure as the primary causation factor in nearly 8% of cases which were studied. The road environment was found to be a contributing factor in a large percentage of motorcycle collisions. This is clearly an area which can no longer be neglected.

As a result of the MAIDS finding, ACEM has established a 'safety structure' and of its eight task groups, one was given the specific responsibility to consider appropriate interventions on the issue of road infrastructure.

It should be noted that road infrastructure and the road environment has been an area of specific interest for the motorcycle industry for some years. A number of national guidelines have been published by industry associations in partnership with manufacturers and users. Of particular note are infrastructure guidelines which have been produced in France, The Netherlands, Norway, Spain and the United Kingdom.

In the UK, the issue is of sufficient importance for the UK Government to publish Europe's first National Motorcycle Strategy. This strategy contains a number of actions aimed towards improving the road infrastructure for PTW users and aligning highways management considerations more towards considering PTWs as a vulnerable mode of transport like cycling and walking, a mode of transport which shares many common traffic policy and infrastructure safety management issues.

ACEM has drawn together expertise on the issue of PTWs and Road Infrastructure under its core structure and a permanent Committee, Committee Five, dedicated to encouraging best practice in transport policy and traffic infrastructure management as it relates to PTWs.

Since the publication of the MAIDS study, Committee Five members have devoted themselves exclusively to the Road Infrastructure task group of ACEM's safety strategy, with this work culminating in the publication in April 2006 of Guidelines for PTW Safer Road Design in Europe. ACEM is pleased to attach a copy of this significant set of European guidelines as part of this consultation response.

In addition, many infrastructure aspects are outlined in ACEM's 2004 update of 'Smart Wheels for City Streets' a policy document which considers the role of PTWs in urban transport and the road infrastructure changes required to reduce vulnerability for PTW users. This is also attached.

Road infrastructure safety for PTWs can be defined in the following broad areas;

[1] MAIDS: Motorcycle Accident In-Depth Study of more than 900 motorcycle and moped accidents during the period 1999-2003 in five sampling areas located in France, Germany, The Netherlands, Spain and Italy. To provide comparative information, more than 900 control cases have also been analyzed in the same sample areas. The data collected in the MAIDS study represents currently the most comprehensive database of PTW accidents available today.

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**Road design and traffic engineering**: PTW safer design of bends, corners, junctions, roundabouts and obstacles on or near the road side;

**Road Maintenance**: the need to ensure that maintenance schedules and road repair standards reduce, or at least not increase vulnerability for PTW users;

**Traffic Management**: design of road signs, rider/driver information, road markings and access to priority measures as a way of reducing rider vulnerability;

**Parking issues**: PTW parking behaviour and requirements, parking resources and design, security.

All the areas above are considered in more depth in the attached ACEM guidelines.

Regarding the envisaged objectives of Community action, ACEM feels that the European Commission is considering a key area for PTW safety and vulnerability reduction. ACEM notes the policy options and legislative tools which have been put forward for consideration and is minded to recommend that the European Commission proceed with Option Two; to provide for Community legislation requiring the adoption of guidelines on infrastructure safety management, leaving details of implementation to member states in cooperation with the riders and industry organisations.

It should be noted that under option two a balance will need to be reached as it can be argued that leaving Member States too much freedom to adopt their own legislation on infrastructure safety management could have some negative impacts, such as lack of harmonisation throughout Europe in such an important field and, moreover, some Member States could be prompt to opt for less expensive and also less effective measures. ACEM would be prepared to discuss full harmonisation on limited but very specific areas where very clear casualty reduction improvements can be immediately made, such as motorcycle safer crash barriers etc.

However, in many broad areas, it seems clear to the European motorcycle industry that although common strands can be pursued on the issue of road infrastructure safety, European member states are not in a 'one size fits all' situation. History, geography, urbanisation, population density advocate national approaches. Best practices will also vary in application according to specific national requirements. However, European guidelines will help advise and 'steer' member states regarding the basic principles of road infrastructure safety. Regular reporting on inspection and audit activities, on the selected priorities and achieved progress will provide the Commission with follow-up tools.

ACEM, which has already extensively developed the guidelines 'approach' through its work on PTW infrastructure safety, would welcome the opportunity to work with the European Commission on developing aspects of any proposed Directive as they relate to PTWs.

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## 2. Response to the Call For Comments

ACEM is pleased to provide the European Motorcycle Industry view on the European Commission's call for comments on specific questions.

1. Do you agree with the definition and assessment of the problem?

In broad terms ACEM agrees with the definition of the problem. It should be noted that as Europe moves towards the attainment of its road fatality reduction targets, road safety policy will need to consider aspects beyond driver/rider training and the machine itself if progress is to be continued in a positive direction. Road infrastructure is one such area where great improvements can be made which can contribute towards an environment where vehicle users become less vulnerable.

2. Do you agree with the policy options defined and assessed.

In broad terms ACEM agrees with the definition of the three policy options. ACEM provides its view on which option should be pursued in the first section of this response.

3. What is your opinion on the measures/instruments described in Point 4? What other measures could be taken?

The three broad areas of impact assessment, audits and safety management are fundamental to the infrastructure design process. However, ACEM would urge the Commission to ensure that each area is measured according to impacts on different modes of travel, particularly with regard to vulnerable modes such as walking, cycling and motorcycling.

4. Do you have any specific comments on the costs and benefits of the different instruments/measures

Although sometimes difficult to perform cost/benefit analysis fed by thorough risk analysis can support decision making process for road safety engineering and maintenance measures. Ranking sites using cost benefit criteria should become common practice.
A cost/benefit analysis covering all transport modes including the most vulnerable ones such as motorcycling is a fair way to integrate without any discrimination the cost of motorcycle accidents. At this point, it is worthwhile to mention that in many cases the infrastructure and road furniture are causes of serious injury aggravations for motorcyclists.

5. Are there any other comments that you would wish to make?

ACEM feels that the European Commission is tackling the issue of road infrastructure at an appropriate point in the evolution of transport safety policy and considers that the foreseen

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directive should cover the widest range of road categories. The impact of road infrastructure/environment is often overlooked when it comes to vulnerable modes of transport such as walkers, cyclists and motorcyclists. This can lead to a climate where such modes are considered dangerous to use, with their users at risk, when in many cases, proper consideration of road design and maintenance can address many of the safety concerns which are raised.

Significant improvements in safety, particularly as it relates to the road infrastructure, can only be achieved if vulnerable modes such as PTWs are 'mainstreamed' in transport policy, with their benefits of use (particularly in traffic-congested urban environments) included as part of the wider transport policy. This allows PTW (and cycle) safer road design, a less threatening environment and fewer casualties through avoidable collisions where the road itself has played a major or primary part.

ACEM is encouraged by the content of the consultation document on Road Infrastructure Safety Management on the Trans European Networks and looks forward to working with the European Commission on developing policy themes.

ACEM
May 2006.

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