

KEY CHANGES IN THE DIRECTIVE ON ROAD INFRASTRUCTURE SAFETY MANAGEMENT

European Cyclists' Federation

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6 December 2019



ECF gratefully acknowledges financial support from the European Commission.

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The directive 2008/96/EC on Road Infrastructure Safety Management (RISM) defines procedures that were supposed to ensure the safety of the trans-European (TEN-T) road network. The procedures cover different stages and aspects of planning, design and operation of major roads but up until now has almost exclusively focused on the safety of car-occupants. The needs of other road users such as cyclists and pedestrians have often been overlooked in the process, resulting in detrimental infrastructure changes, for example an important cycle route cut off from the rest of the network by a motorway interchange.¹

In November 2019, a revision of the directive was published in the Official Journal of the European Union.² The amendments implemented through the directive (EU) 2019/1936 recognise the need to pay more attention to the safety of cyclists and pedestrians and include many important improvements that ECF has lobbied for in the past two years. The EU Member States now have two years to transpose the updates into national regulations. In this document we quote the main changes and discuss briefly their consequences.

¹ See e.g. "RISM Directive for Cyclists – Interview with ECF Advocacy Director Adam Bodor" and "[Will the EU continue to spend billions on projects that make it unsafe and difficult to cycle to work?](#)"

² Directive (EU) 2019/1936 of the European Parliament and of the Council of 23 October 2019 amending Directive 2008/96/EC on road infrastructure safety management: <https://eur-lex.europa.eu/eli/dir/2019/1936/oj>



The directive (EU) 2019/1936

Taking the needs of cyclists into account

New Article 6b "Protection of vulnerable road users" states that:

"Member States shall ensure that the needs of vulnerable road users are taken into account in the implementation of the procedures set out in Articles 3 to 6a."

This provision applies to all the procedures defined in the directive:

- Road safety impact assessment for infrastructure projects (planning stage),
- Road safety audits for infrastructure projects (4 stages):
 - draft design,
 - detailed design,
 - pre-opening,
 - early operation;
- Network-wide road safety assessment (roads in operation);
- Periodic road safety inspections (roads in operation);
- Follow-up of procedures for roads in operation.

'Vulnerable road users' are defined in article 2 point 10 as *"non-motorised road users, including, in particular, cyclists and pedestrians, as well as users of powered two-wheelers"*.

The provision is very generic but gives a clear indication that the needs of cyclists must also be considered when planning, designing, maintaining and evaluating major roads. The annexes to the directive, also updated, give examples on how to do it (see below), but they are only indicative, so a lot depends on how Member States transpose the directive to national laws.

Guidance on quality requirements regarding vulnerable road users

In Article 4 "Road safety audits for infrastructure projects" the following paragraph 6 is added:

"6. The Commission shall provide guidance for the design of "forgiving roadsides" and "self-explaining and self-enforcing roads" in the initial audit of the design phase, as well as guidance on quality requirements regarding vulnerable road users. Such guidance shall be developed in close cooperation with Member State experts."

While the guidance for the design of "forgiving roadsides" and "self-explaining and self-enforcing roads" are restricted to the initial audit of the design phase, no such restriction is added for quality requirements for vulnerable road users. Therefore, the quality requirements regarding vulnerable road users should be applicable in all audit phases as well as in other procedures listed above.

The guidance shall be developed in close cooperation with Member State experts. We consider it important to include both practitioners from champion cycling countries like the Netherlands or Denmark, that can provide best practice, and from beginner countries that provide a reality check on what can be implemented across the whole of Europe.



Training of road safety auditors

In Article 9 "Appointment and training of auditors", the following paragraph 1 a is inserted:

*"1a. For road safety auditors taking their training from 17 December 2024, **Member States shall ensure that the training curricula for road safety auditors includes aspects related to vulnerable road users and the infrastructure for such users.**"*

In many Member States the training curricula for road safety auditors currently do not include anything specific on pedestrians and cyclists. Therefore, the auditors were not taught to identify hazards relevant for those groups of users. The revision obliges to update the curricula, but with an additional lead time of three years.

Reporting the improvements in protection of vulnerable road users

Vulnerable road users are mentioned also in the new article 11 a "Reporting"

*"1. Member States shall provide a report to the Commission by 31 October 2025 on the safety classification of the entire network assessed in accordance with Article 5. Where possible, the report shall be based on a common methodology. If applicable, the report shall also cover the list of provisions of national updated guidelines, **including in particular the improvements** in terms of technological progress and **of protection of vulnerable road users**. From 31 October 2025, such reports shall be provided every five years."*

The results of network-wide road assessment should be reported to the Commission, together with relevant updates in national guidelines, including in particular improvements in term of protection of vulnerable road users (e.g. new cycling infrastructure standards). Member States are not required to update their national guidelines per se (it might not be necessary), but in case they are having problems with safety of cyclists or pedestrians, the obligation to report gives an additional push to look into the quality of infrastructural guidance regarding these groups of users.

Extension of scope

In Article 1, paragraph 2 and 3 are altered to extend the scope of the Directive from trans-European network exclusively to include also primary roads (connecting major cities and regions) and non-urban roads completed with EU funding:

"2. This Directive shall apply to roads which are part of the trans-European road network, to motorways and to other primary roads, whether they are at the design stage, under construction or in operation.

3. This Directive shall also apply to roads and to road infrastructure projects not covered by paragraph 2 which are situated outside urban areas, which do not serve properties bordering on them and which are completed using Union funding, [...]"

There is some flexibility in the definition of primary roads and in the fine print of other paragraphs. But each Member State shall notify to the Commission, by 17 December 2021, the list of motorways and primary roads on its territory and the Commission shall publish the list.



Annexes to the Directive

ANNEX I. INDICATIVE ELEMENTS OF ROAD SAFETY IMPACT ASSESSMENTS

In section 2, the point (e) is amended as follows:

"(e) traffic (e.g. traffic volume, traffic categorisation by type), including estimated pedestrian and bicycle flows determined from adjacent land-use attributes;"

The road safety impact assessment shall be carried out at the initial planning stage before the infrastructure project is approved (e.g. when examining different variants of the route). The assessment should include estimating the potential of pedestrian and cycling flows from the adjacent land use attributes. This can help to identify problems such as new road creating a barrier for non-motorised traffic (e.g. when located between a settlement and significant workplace) and determine necessary elements of pedestrian and cycling infrastructure to include in the further stages (e.g. best locations for tunnels under the planned motorway).

ANNEX II. INDICATIVE ELEMENTS OF ROAD SAFETY AUDITS

In section 1, the following point (n) is added:

"(n) [...]"

ii) provisions for cyclists, including the existence of alternative routes or separations from high speed motor traffic

[...]"

iv) density and location of crossings for pedestrians and cyclists,

v) provisions for pedestrians and cyclists on affected roads in the area,

vi) separation of pedestrians and cyclists from high speed motor traffic or the existence of direct alternative routes on lower class roads;"

Section 1 describes the criteria to consider at the draft design stage. Previously cyclists were not mentioned at all at this stage. Point ii) is redundant, as iv) – vi) cover all the important aspects:

- The movement of cyclists **ALONG** the (re)constructed road – sometimes it means a segregated cycle and/or pedestrian path along the road, but in many cases alternative routes on lower class roads can be identified and if necessary adapted to safely share between low-volume, low-speed motorised traffic and cyclists.
- The movement of cyclists **ACROSS** the (re)constructed road – sufficient density of safe and comfortable crossings is necessary for the road to not become a barrier for active mobility.
- Other affected roads (e.g. a regional road that will face increased traffic because of a connection to constructed interchange).



ANNEX IIa. INDICATIVE ELEMENTS OF TARGETED ROAD SAFETY INSPECTIONS

The findings of network-wide road safety assessments (see below) should be followed up by targeted road safety inspections (or direct remedial actions). The new annex includes several elements explicitly mentioning vulnerable road users:

"2. Intersections and interchanges:

[...]

(g) existence of pedestrian and cycling crossings.

3. Provision for vulnerable road users:

(a) provision for pedestrians;

(b) provision for cyclists;

[...]

6. Objects, clear zones and road restraint systems:

[...]

(b) roadside hazards and distance from carriageway or cycle path edge;

(c) user-friendly adaptation of road restraint systems (central reservations and crash barriers to prevent hazards to vulnerable road users);"

But, in line with article 6b of the directive, the needs of pedestrians and cyclists should also be considered when analysing other elements (e.g. visibility and sight distances, readability of road signs and markings, lighting, pavement defects etc.)

Annex III. INDICATIVE ELEMENTS OF NETWORK-WIDE ROAD SAFETY ASSESSMENTS

The new procedure of network-wide road safety assessment focuses on collecting data about existing roads to provide input for evidence-based policies. The indicative list of elements includes both cycling traffic and cycling infrastructure:

"2. Traffic volumes:

(d) observed bicycle volumes on both sides, noting "along" or "crossing";

[...]

(g) estimated bicycle flows determined from adjacent land use attributes."

Bicycles can often bidirectionally cycle on both sides of a highway, e.g. on bidirectional cycle paths or service roads, and the measurement methods sometimes need to be adapted to take that into account. Moreover, to correctly assess main roads it is important to quantify not only cycle traffic along the road, but also crossing it. In cases of e.g. bypasses number of cyclists moving across the assessed road might be much higher than along.

"5. Geometric characteristics:

(a) cross section characteristics (number, type and width of lanes, central median shoulders layout and material, cycle tracks, foot paths, etc.), including their variability; [...]"

"10. Vulnerable road users' facilities:

(a) pedestrian and cycling crossings (surface crossings and grade separation);



(b) cycling crossings (surface crossings and grade separation);

[...]

(e) bicycle facilities and their type (cycle paths, cycle lanes, other);

[...]

(g) pedestrian and cycling crossing facilities on entry arm of minor road joining network;

(h) existence of alternative routes for pedestrians and cyclists where there are no separated facilities.”

Point 10(b) is redundant (cycling crossings are already covered by (a)), a result of multiple amendments with the same intention voted at once. But the indicative list of facilities to assess on existing roads contains key elements for cyclists:

- facilities along the assessed road,
- crossings across the assessed road,
- crossings on entry arms of minor roads.

The assessment should include the type of the facility as well, as for example cycle paths have different range of applicability than cycle lanes. In case there are no facilities for pedestrians and/or cyclists along the assessed road, the annex indicates that it is important to identify whether these groups of users have an alternative route e.g. on parallel lower-class roads.

