



## Evaluation of Directive 2006/126/EC on driving licences

Motorcycling provides added value for individuals and society at large as a mobility and leisure tool. To ensure that society fully benefits from all the advantages offered by motorcycles<sup>1</sup>, the industry works on improving the safety record of riders across Europe (the industry safety strategy was launched on 1 October 2020 and is available at <https://roadsafetystategy.acem.eu/>).

Proper licensing and post-licensing systems are instrumental in achieving better safety performance for all road users, including motorcycle riders.

ACEM believes that the European legal framework regulating access to vehicles is crucial.

**ACEM sees no need to change the L-category part of Directive 2006/126/EC at this time.**

If the text has to be re-opened, we would propose the following improvements:

### **1. All future modifications of the legislative framework should be evidence-based, considering best practices and socio-economic parameters**

In view of any potential future revision/modification to the current Driving Licence Directive the motorcycle industry supports a fact-based approach, where lessons learned from a representative sample of European countries should feed into proposals that have the robust potential to enhance safety.

<sup>1</sup> The term "motorcycles" must be understood as reference to L-category vehicles (i.e. mopeds, motorcycles, tricycles, light and heavy quadricycles)

It is important that the DLD regime is evaluated for its effects on a wide range of parameters, such as social mobility, socio/economic, etc. and to ensure it is not prohibitive for access to motorcycles. Any changes must be data driven.

The industry calls on the European Commission to legislate for better collection and analysis of accident data.

## 2. Aligning the L-category type-approval framework and 3DL

The L-category type-approval framework has been considerably redesigned after the entry into force of Directive 2006/126. This complete overhaul of the homologation rules includes modifications in the classification of the various vehicle categories.

Against this background, the motorcycle industry stresses the imperative need to re-align the L-category type-approval framework and Directive 2006/126. Adapting Directive 2006/126 to the technical changes in the homologation framework will further improve the Directive's application and avoid potential confusions at national level.

## Further comments and aspects to be taken into consideration

### 1. Graduated access system for motorcycle licences

The motorcycle industry supports the general principle of a graduated approach. The graduated approach concept should allow a rider with a lower sub-category licence such as A1 (obtained after an initial test), who wishes to obtain an A2 licence, to concentrate on the additional aspects that were not covered in the A1 test or training programme.

Unfortunately, today in many countries, riders upgrading their licence are forced to repeat the same tests or undergo the same training curriculum, which has limited safety benefits and completely ignores the rider's previous experience. Graduated access already is a very complex and expensive system. Time and money should not be spent on unnecessary repetition.

The graduated approach must firstly ensure that existing skills are still present and reward the rider for the decision to gradually step up and progressively build riding and safety-orientated experience.

Mandatory application of both training and testing will further complicate the system, making it much less appealing for riders. The possible introduction of mandatory testing and training, risks jeopardizing the overall concept of progressive access, which is expected to bring substantial safety improvements.

Countries currently have the freedom to go beyond the minimum requirements in the Directive. Some countries demand testing and training for each step. This option should be limited and countries should be required to choose between these two options and not combine them.

## 2. Direct access for motorcycle riders (only possible from the age of 24)

Category A include a very wide range of motorcycle types, styles and segments used by European citizens and the motorcycle riding community for mobility and leisure purposes.

The Directive provides the opportunity and flexibility for countries to adapt the driving licence system for their specific national situation, taking into account their citizens' needs and interests. This also provides an opportunity to bring legislation closer to citizens. The direct access provision embedded in the Directive is one such feature that allows countries to adapt according to their national situation.

Direct access should be accompanied by proper testing and training. The possibility to directly access the type of motorcycle someone wants to ride at the age of 24 (previously 21 years of age), following the due training and testing, allows citizens to choose the transport mode that best suits their personal needs.

A rider directly accessing an A licence is taking advantage of the traffic experience gained during previous years as a driver and the new skills acquired with training on the motorcycle and demonstrated at the moment of testing.

There is no direct correlation between A-category vehicles use and an increase in accidents. According to In-depth investigation of motorcycle accidents (MAIDS)<sup>2</sup> other vehicle drivers are largely responsible for PTW crashes in 50 % of all MAIDS cases and in 61 % of multi-vehicle accidents. 72% of collision accidents caused by other vehicles were due to the perception failure of car drivers. Therefore, the industry proposes enhanced focus on driver attentiveness towards other road users in future driver training or testing curricula.

## 3. Lifelong learning should be encouraged and recommended to all road users

The human factor has repeatedly been shown to be the most critical factor in accidents involving riders. For this reason, the motorcycle industry encourages continued outreach to new and existing motorcycle riders, on the importance of lifelong training.

Riders should be encouraged to undergo voluntary post-licence training and Member States and insurance companies could contribute by providing special offers and incentives. The lifelong learning approach should focus on building a safety culture to benefit all road users. Lifelong learning should be recommended to all road users, not just motorcycle riders.

## 4. High quality training could play a significant role in safety improvements

There is a need to considerably improve the quality of training, introducing European/national guidelines on licensing and post-licensing training that outlines basic minimum criteria for:

- Riding instructors' certification
- Content of training schemes: curriculum integrating safety elements, hazard perception and safety awareness and incorporating aspects related to new technologies (cooperative and automated).

<sup>2</sup> MAIDS: <http://www.maids-study.eu/>

# Evaluation of Directive 2006/126/EC on driving licences

ACEM joined forces with the German Road Safety Council (DVR) and the International Motorcycling Federation (FIM) and established the European Motorcycle Training Quality Label. In order to obtain the Label, programmes must be safety-orientated; trainers' qualifications and training methodology are some of the most important criteria for being positively evaluated.

Over a period of three years, 31 post-licence training programmes, from multiple European countries, have been certified. The [European Motorcycle Training Quality Label](#) also received the European Road Safety Award in 2019.



In 2019, The European Commissioner for Transport acknowledged the key role played by The European Motorcycle Training Quality Label in training motorcyclists and improving their safety across Europe.

## 5. Riders making use of equivalence options between various license categories

The equivalences granted to B licence holders, consisting of B/AM, B/A1 and B-tricycle, are a valid option in many Members States today. This option is available for citizens who fulfil certain well-defined conditions, such as a minimum of 2 years holding a B licence, obligatory training or testing, etc.

The in-depth motorcycle study, MAIDS, shows that equivalence riders also become safer car drivers because they learn to pay more attention to vulnerable road users in traffic.

The motorcycle industry confirms its support for these entitlements, especially as they safeguard a minimum level of mobility for citizens in Europe, as well as affordable commuter vehicle accessibility.

## 6. Riding/driving an equivalence vehicle on a B licence across borders in Europe

Citizens riding/driving such equivalence vehicles on a B licence granted under 3DLD (more specifically B-AM; B-A1; B-tricycle), regularly face legal uncertainty and mobility constraints in transborder traffic when travelling across Europe, as this equivalence is recognized only within the territory of the Member State granting the equivalence itself.

This is true for tricycles, which are reportedly used for long-distance riding among EU Member States. It also applies to light motorcycles and mopeds, often rented to explore holiday destinations or to commute during a business trip. Moreover, the B-AM and B-A1 are also affordable commuter tools for citizens accessing education or employment opportunities in neighbouring border regions.

For the sake of seamless mobility in the European Union and to eliminate barriers to citizens' mobility in border regions of the Union, as well as supporting police enforcement, the motorcycle industry proposes that once an equivalence is granted in one country, such entitlement to the rider would be recognized in all countries where the same equivalence is granted. To that purpose, B/AM, B/A1 and B/ tricycle equivalence should be clearly stated on the driving licence.

**The European Association of Motorcycle Manufacturers sees no need to change the L-category part of Directive 2006/126/EC at this time.**

## About ACEM

The European Association of Motorcycle Manufacturers (ACEM) represents manufacturers of mopeds, motorcycles, three-wheelers and quadricycles (L-category vehicles) in Europe.

ACEM members include 18 manufacturing companies: BMW Motorrad, Bombardier Recreational Products (BRP), Ducati Motor holding, Harley-Davidson, Honda, Kawasaki, KTM, KYMCO, MV Agusta, Peugeot Scooters, Piaggio, Polaris Industries, Qooder, Royal Enfield, Suzuki, Triumph Motorcycles, Yamaha and Zero Motorcycles.

ACEM also represents 20 motorcycle industry associations in 17 different European countries. About 300,000 jobs depend on the L-category industry in Europe. There are more than 39 million motorcycles and scooters on Europe's roads (2019 estimate).

To find out more about ACEM please visit [www.acem.eu](http://www.acem.eu)