

## **Response to Inception impact assessment, Revision of the Directive on driving licence**

SMC, Sveriges MotorCyklister (the Swedish Motorcyclists' Associations) represents 150 000 motorcyclists in Sweden which is 25 % of the motorcycle owners in Sweden.

The goals for SMC are to make it possible for users of powered two-wheelers to ride their motorcycle in an appropriate way with freedom of choice of how, when, where and which motorcycle to use today and in the future. It is very important to make motorcycling as safe as possible and affordable. Training, education, and testing are important matters when it comes to safety, affordability, and threshold to motorcycling. It must be possible for both women and men to get equal training and testing which is not the case today. Women fail the test more often after the third DLD. One reason is that a new test is demanded between A2 and A and that stricter demands on the test vehicles have been introduced which made a lot of low motorcycles with an effect of 40-50 kW impossible to use at the riding test.

People with some sort of disability should must also be included in the DLD. With a possibility for exemptions during the training and testing this must be made possible in the next directive.

The number of motorcyclists are increasing in Sweden while at the same time the number of fatal and severe accidents are going down. However, one third of the fatal and severely injured over the last ten years didn't have a valid license at the accident. The number and share is increasing since the third DLD was introduced 2013.

SMC agrees with the commission that the safety of riders must be highlighted. But, to make it more difficult and expensive to ride a motorcycle is not the solution. Instead it is obvious that the content of the education and training is most important to reach Vision Zero.

For SMC it is important to share our view in the published roadmap on the revision of the current Directive on driving licences.

### **The Commission has formulated five key problems:**

1. Excessive number of road crashes with fatalities and serious injuries where dangerous behaviour plays a role.
2. Excessive number of road crashes with fatalities and serious injuries in which insufficient skills, knowledge and/or medical fitness plays a role.
3. Lack of recognition of digital or virtual driving licences outside the territory of the issuing Member State.
4. Remaining barriers for the citizens to obtain a driving licence or to maintain their driving rights when exchanging/renewing driving licences.
5. Possible sub-optimal use of new technologies and mobility concepts for what concerns environmental performance.

### **The Commission has also formulated five objectives to solve these key problems:**

1. Increase safety on the Union's roads by reducing dangerous behaviour
2. Increase safety on the Union's roads by improving driving skills as well as by increasing risk awareness and knowledge on road safety
3. Increase safety on the Union's roads by ensuring that medically fitness of drivers is adequately assessed in a consistent manner in the entire Union.



4. Remove remaining barriers on free movement resulting from the scope of and the implementation of existing rules to issue, exchange and renew driving licences
5. Enable the recognition of digital driving licences among Member States of the European Union

### **SMC views on the five objectives**

**1. Dangerous behaviour.** This is a matter of enforcement and education. Young road users must be educated how to behave and what it means for them from early age. This has a low priority in the Swedish schools. Education and training is not a part of the Vision Zero-concept. The most dangerous drivers and riders are the ones without a valid drivers license. Their share of the fatal and serious motorcycle accidents is 30 % and increasing. This group can mainly be reached with enforcement. SMC have trained riders since 1976. One important part is attitudes. This must become a vital part of the driving licence education to become a responsible road user.

**2. Driving skills and risk awareness.** These are two different things, but the Commission takes them together. Driving skills are technical skills, which for motorcyclists are mainly trained and tested in a way and in an environment that has little to do with real driving situations. Present requirements on driving (riding) skills have only a limited impact on road safety. Annual statistics and several questionnaires shows that women train most, spend most money in traffic schools and uses most of their education and training to pass a complicated manouver test in low speed. In spite of these efforts women fail the tests more often than men and they fail in the manouver part. All stats show that women are safer road users. Most women who dies/are injured in motorcycle accidents are passengers, not riders. This is not what the stats show where women fail the tests more often than men.

A very important part in a rider education is risk awareness. This requires the skill to recognize, assess and anticipate on situations that could impose a risk to the rider. This can be traffic situations, road course, condition of the road and other expected or unexpected situations. To be prepared for this is in our view the major contribution to road safety that can be linked to the rider, and it is exactly this element that we miss in the present requirements for the driving licence. To develop these skills a good initial riding training and post-licence trainings are important.

At the same time, training and testing should not impose an unnecessary burden on the rider in terms of time, energy, and costs. The threshold to obtain a full motorcycle driving licence is already much higher than for a car driving licence as result of the staged entry with repeated test (and thus training) requirements. By making the right choices it is possible to have better trained riders, that show a safer and more responsible attitude and behaviour in traffic and lower the threshold in the same time. **There is one obvious and easy solution for this:** allow stepped access from A1 to A2 and then to A without tests, only the two year limit. This will give all riders, regardless of age and sex, to start with a smaller bike and move towards the bigger bikes. Meanwhile they get experince riding a smaller bike.

**3. Medical fitness.** A distinction is needed by physical disabilities, chonical diseases and use of medicines that can have a negative effect on driving capability. Physical disability can often be solved using adapted controls (even in the case of PTWs) and should in many cases not be cause of a too high threshold. The permission given by the authorities of one member state to drive/ride in such a way must be recognized in other member countries. In SMC we've had examples of riders with a disability that made it impossible to go to a traffic school and do the test.



Extra caution is necessary in the case of chronic diseases. A possibility to do a simple riding/driving test at a traffic school could be a solution to show that you can ride/drive a vehicle.

**4. Barriers on free movement.** Many riders in Sweden have a motorcycle where they can tow a trailer. The motorcycles are usually big touring bikes, like Honda Goldwing. The users are rather old and experienced since the trailers are used for touring around the continent. This is not regulated, which leads to the situation that riding with a trailer behind a motorcycle is permitted in some member states but not in all.

Another, more important issue, is the use of a light motorcycle (<125cc) with a B-licence. needs to be regulated on EU-level, including a minimum demands on training. SMC has been contacted by EU-citizens who have this license in their home countries. When they moved to Sweden they are no longer allowed this. The light motorcycles are mostly used in low-speed traffic by commuters who try to avoid traffic jams. By doing this they contribute to the reduction of urban congestion. SMC suggest the Commission to initiate a cost-benefit assessment to investigate this.

**5. Mutual recognition of digital driving licences.** SMC support the establishment of a framework for digital driving licences.

**SMC wants to add the following:**

The average age of a person who get an A-license in Sweden is 35 years. The age among women is higher (38) compared to men (34). Higher age, more training and experience seems to be negative when it comes to pass the riding test for motorcycles. This is something that should be looked into in the coming directive.

The cost for a riding test for motorcycle is SEK 1645-2145 (€170-215). On top of this the cost to rent a motorcycle from a traffic school is around €300. The places where you can do the riding test are limited due to the need for huge areas for the manouver tests. This means long distances to the tests.

The time frame where you can do a riding test in Sweden is short, April/May-October. Already now, in the beginning of May, there are very few possibilities to get a riding test this year. If you fail (which women does more often) it means that you might have to wait a year for the second test. This means additional costs for riding lessons on top of the test costs of about €500. The demand for three tests is not the right way to make it possible to get an A-license.

It is important to start looking at the driving license directive as soon as possible. The demands and restrictions for those who wants to ride a motorcycle is one reason for the high share of fatal and serious accidents among riders without a license in Sweden.

Regards from the motorcyclists in Sweden

Maria Nordqvist  
[maria.nordqvist@svmc.se](mailto:maria.nordqvist@svmc.se)  
+46 70 5383938

