

drivers. Concerning the possible revision of the present European driving licence directive, we are of the opinion that the Commission should use the opportunity to abolish the stepped entry to the A-licence or at least set it up in such a way that it does not form an additional threshold for new motorcyclists and, as written above, the focus must be on higher level skills.

Concerning the key performance indicators, the Commission has drafted several KPIs concerning safe road use.

- The KPI for speed: *Percentage of vehicles travelling within the speed limit*. Speed limits have several functions and road safety is one of them. Other reasons to introduce a speed limit can be noise annoyance, air pollution, traffic flow, etcetera. Furthermore, different member states have very different speed limits on comparable roads. Finally, there is a difference between speed limits and safe speeds. The latter can be much lower, depending on the local situation, traffic situation, weather, vehicle. To connect speed limit to safe speed and base a KPI on that is not logical for us.
- The KPI for sober driving: *Percentage of drivers driving within the legal limit for blood alcohol content (BAC)*. Although this seems a logical KPI, again legal limits differ per member state and per category of driver.
- The KPI for driver distraction: *Percentage of drivers not using a handheld mobile device*. Mobile devices are used for many purposes in cars. They can be used for navigation purposes, to call, to write text messages and even to play games. This can all be done, and is done, hands-free. The KPI does not give a good view of distraction by mobile devices.
- The KPI for the use of safety belts and child restraint systems: *Percentage of vehicle occupants using the safety belt or child restraint system correctly*. The correct use of safety belts and child restraint systems is essential to avoid fatalities and severe injuries after an accident, but do not contribute to the avoidance of an accident. In the 'Vision Zero' approach this KPI may be logical, for us it is less obvious, because the correct use of safety belts and child restraint systems does not avoid any accidents.
- The KPI for protective equipment: *Percentage of riders of powered two-wheelers and of cyclists wearing a protective helmet*. We are of the opinion that the latter may not be the most logical KPI. Especially the combination of the (in most cases) mandatory crash helmet usage for riders of powered two-wheelers and the (in most cases) voluntary use of helmets for cyclists will give a distorted picture. we have no objections to them.

6. Emergency response

