



The Federation of European
Motorcyclists' Associations

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The Commission has also formulated five objectives to solve these key problems. The specific objectives are to:

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

About:

1. 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 in a way that is understandable for them. FEMA members have experience with educational programs directed at children in the age group 12-16 years and have evidence that this had a positive effect on the number of accidents. Also, during the training for the driving licence education to be a responsible road user is important and goes much further than education of traffic rules.
2. Driving skills and risk awareness. These are two different things, but somehow 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. Risk awareness is much more important and 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. FEMA has already showed how to do this in the [Initial Rider Training project](#) and the resulting [project report](#) and [manual \(The IRT Model\)](#)

3. Medical fitness. We recognize the importance of medical fitness. Distinction must be made by physical disabilities, chronic diseases and use of medicines that can have a negative effect on driving capability. The consequences of a physical disability can often be overcome by using adapted controls (even in the case of PTWs); physical disabilities should not necessarily form an obstacle to obtain a driving licence. This also means, that it must be possible to follow trainings and tests with a vehicle with adapted controls. The permission given by the authorities of one member state to drive/ride in such a way must be recognized in other member countries. Extra caution is necessary in the case of chronic diseases, including bad eyesight, and /or the use of drugs that can impair the driving ability.
4. Barriers on free movement. Here we ask for attention for the use of trailers behind motorcycles. This is still 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. More information about this [here](#). Also, the use of a light motorcycle (<125cc) with a B-licence needs to be regulated on EU-level, including minimum demands on training. Now several member states have their own [regulations and demands](#), but this works only on their own territory and not cross border. These 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. We suggest the Commission to initiate a cost-benefit assessment to investigate this.
5. Mutual recognition of digital driving licences. We support the establishment of a framework for digital driving licences.

In general, FEMA asks for a change of direction from the present focus on technical skills at low speeds to higher skills that leads to better risk awareness and preparation to handle unexpected situations. This can be done without raising the threshold to obtain a full A-licence by making different choices and to make it easier to go through the stages from A1 to A. We also draw attention to the present structure of the Directive regarding training- and test motorcycles which makes that that women and smaller men are still unnecessarily excluded. A change on the demands on trainings- and test motorcycles could change that. Finally, we ask for a further harmonization with respect of trailers and the possibility to ride a light motorcycle with a B-licence in all member states.