



Federation of European
Motorcyclists' Associations

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To the Members of the Transport
Committee of the European Parliament

Brussels, 27/01/2021

Subject: **mandatory technical inspection for motorcycles**

Dear Member of the Transport Committee of the European Parliament,

The Federation of European Motorcyclists' Associations represents the European motorcyclists. As a motorcyclists' advocate organization we are deeply involved in road safety matters and to fight for more motorcycle road safety is one of our core activities. To enhance road safety for motorcyclists we look at the riders themselves and the way they are trained, the motorcycles and the infrastructure.

The Transport Committee is now discussing the draft implementation report on the road safety aspects of the Roadworthiness Package. We noticed that among the Members of the Transport Committee there is a call to include powered two-wheelers in the Periodic Roadworthiness Tests Directive (2014/45/EU).

The periodic technical inspection (PTI) of motorcycles is subject to a very old discussion in which various parties always have argued that this would benefit road safety. However, not only is there no evidence that the technical state of motorcycles plays a significant role in accidents, available reports on motorcycle accidents all point in the opposite direction: the technical state of motorcycles plays only a very marginal role in accidents¹. Training of road users, behavioural aspects, infrastructure and enforcement of existing traffic rules play a much higher role in road safety than periodical technical inspections ever will. It is for this reason that in 2013 the present compromise as is formulated in Directive (2014/45/EU) was reached in the discussions between the European Parliament and the Council.

We have read the study commissioned by the Commission's Directorate-General for Mobility and Transport (DG MOVE) and published in February 2019 on the inclusion of light trailers and two- or three-wheel vehicles in the scope of the periodic roadworthiness testing to which references are made in the draft "Implementation report on the road safety aspects of the Roadworthiness Package (2019/2205(INI))" that you are discussing now. The recommendation in this study to include powered two-wheelers in the periodic technical inspection is solely based on statistics concerning 50cc mopeds in one member state (Spain). These statistics are without further grounds extrapolated to all kinds of

¹ Dekra Motorcycle road safety report (Germany, 2010); MAIDS In-depth investigations of accidents involving powered two wheelers. Final report 2.0 (Belgium, 2005); Jarosiński W. Periodic technical inspections of vehicles and road traffic safety with the number of road accidents involving fatalities. Eksploatacja i Niezawodność – Maintenance and Reliability; 16 (1): 105–111 (Poland, 2014); Technical failures with an effect on the accident in fatal motorcycle accidents in Sweden 2005-2011 (341), Trafikverket (Sweden, 2012); SAFERWHEELS Study on Powered Two-Wheeler and Bicycle Accidents in the EU, Final Report, Brussels (2018)

powered two- and three-wheelers in whole Europe. In our view, this can never serve as an argument to mandate a PTI for all powered two- and three-wheelers, especially when there is no other evidence at all to substantiate this. In general, the study does not meet the qualifications for a good report. The research methods are not defined in a clear manner with sufficient detail; are not planned and executed objectively; not in a systematic and logical way; limitations and assumptions are not clearly highlighted; no sufficient, reliable and valid data used; limitations of the data are not understood; conclusions are not justified by the data².

Several studies³ show that motorcycles are in general very well maintained and have very few technical defects. The technical defects that do exist are mainly due to normal wear in tyres and lighting that can easily happen between technical inspections and must be taken care of by the rider before every trip, as all riders learn with their training and which knowledge is also part of the driving licence test. In our view, to mandate a periodic technical inspection for motorcycles is not only unnecessary from a road safety point of view, it also puts an extra and unnecessary burden in time and money on the motorcyclist. In some low populated areas and countries in Europe, technical inspection stations can be as far as 200 kilometres away from your residence. Motorcycle- and moped owners will in some occasions be forced to ride literally hundreds of kilometres to the nearest technical inspection station and spend so much time on this that they lose several days to have their motorcycles technically inspected.

To conclude, we not only see no reason to change the existing situation, we also think that the negative aspects of mandatory periodic technical inspections for motorcycles surpass the possible (and unproven) benefits of these inspections. At the presentation in the Transport Committee on the 25th of January, 2021 of the draft "Implementation report on the road safety aspects of the Roadworthiness Package (2019/2205(INI))" by rapporteur Benoît Lutgen, the rapporteur himself expressed his doubts if a mandatory periodic technical inspection would be the best way to enhance motorcycle road safety. We do not have these doubts, we are certain that other measures like road-side enforcement, better training, safer infrastructure and technical developments like V2X communication will play by far a bigger role in more road safety for motorcyclists.

Please do not hesitate to contact me by email (dolfwilligers@femamotorcycling.eu) or telephone (+31613269211) if you need more information or if you want to discuss this with us.

Yours sincerely,



Dolf Willigers,
General Secretary.

² Evaluation of study by the European Commission, Directorate-General for Mobility and Transport, Directorate DG - MOVE, Unit C2 - Road Safety, Jari Kielinen, SMOTO (Finland, 2020)

³ Motorcykelulykker, Havarikommissionen for Vejtrafikulykker (Denmark, 2009); <https://www.pressebox.de/pressemitteilung/tuev-sued-ag/Sieben-von-zehn-Motorraedern-ohne-Maengel/boxid/238278> (Germany, 2009) ; <http://auto-presse.de/autonews.php?newsid=227099> (Germany, 2012); Periodic technical inspection – from a Swedish perspective, SMC (Sweden, 2021).