

## FEMA Response

### Public Consultation on Driver Training and Traffic Safety Education

#### A. Training education questionnaire

**1. Do you think that driver training systems should be harmonised in the EU? If so, what advantages would it have for traffic safety, and what problems do you expect?**

Riding a motorcycle with an acceptable level of safety requires skills, knowledge, a focused attitude and a conscious behaviour. Thus, no one should start riding a motorcycle without having undertaken structured, relevant and cost-effective basic training.

Initial rider training programmes vary enormously from Member State to Member State - from virtually non-existent to extensive, compulsory and very expensive. It is not necessarily true that very advanced and expensive training gives the greatest road safety benefits. In addition, if initial rider training becomes too comprehensive, and therefore very expensive, A-licence candidates will probably try to avoid all non-compulsory parts.

Most initial rider training schemes are influenced by the existing licence test. Thus, the quality of training inevitably reflects the quality of the licence test. Some rider training programmes may be criticised for just "teaching the skills needed to pass the licence test", instead of teaching the essential skills and knowledge needed to survive on the road.

Thus, it is vital to identify the key factors in basic training that effectively make the novice rider capable of safely operating a motorcycle in normal traffic situations on public roads. The motorcycling community can provide essential input in developing and implementing training programmes, but unfortunately, consultation of riders by responsible authorities is often insufficient.

Another impediment to a cost-effective Pan-European initial rider training scheme is lack of consensus: various private companies and organisations offering rider training throughout Europe seem unable to agree on the basic guidelines, strongly defending their own particular approach, involving themselves in rather meaningless disagreements on minor, insignificant details.

It was therefore essential to start a process, find a common definition of concepts, develop an effective common methodology, define realistic and helpful training exercises and develop a harmonized and precise textbook in order to achieve a truly quality assuring European licence test. FEMA, together with ACEM, FIM and other organisations, set up the *Initial Rider Training Project* (IRT), a European Commission co-funded project that addressed the serious shortcoming in European initial rider training.

The *Initial Rider Training* project defined the essential elements of, and the means by which a comprehensive, affordable and relevant European model for pre- licence rider training can be developed.

The European Commission should use the IRT model as a basis for assessing the quality of existing national rider pre-licence training arrangements. Differing social and economic initial rider training arrangements and circumstances should be more clearly acknowledged within Europe's training policies and strategies, as well as cultural, geographic and climate-related specificities. The European Commission should include the IRT model training programme as a basis for improving pre-licence rider training within the 3<sup>rd</sup> Driving Licence Directive framework.

As for category B licencing systems, the same guidelines should apply, with an emphasis on vulnerable road users awareness. Driving tests for all categories should put the emphasis on life-saving skills and situational awareness. In particular, motorcycle awareness training should be compulsory in all categories of vehicle training.

## **2. Should traffic education at school be mandatory?**

Yes. Traffic interaction has become an everyday element of the environment for the vast majority of children in Europe. As the population becomes more urban and more mobile, traffic education provides not only life-saving skills, but the basic knowledge and experience required to be an active member of society. Considering that traffic-related accidents are one of the main causes of premature death for children and young adults, it is only natural to train and educate children in road safety.

In addition, if traffic education starts early and remains part of the curriculum throughout the education process, it will have a positive influence on young adults who start their driver and rider training, as they better understand the need for cooperation and mutual respect between road users.

### **3. Should driving instructors undergo continuing professional development?**

Yes. Instructor training varies enormously throughout Europe - from virtually non-existent to the official requirement of a two-year course at college level. The quality and effectiveness of training is highly dependent upon the instructor's competence. No one should be allowed to offer training without having participated in a recognised instructors training programme.

FEMA firmly believes that European motorcycle safety would benefit enormously from basic guidelines for the education of motorcycle instructors.

There is however a risk of making the training activity non-viable in parts of some member states where population density, and therefore demand, are low.

### **4. Should coaching be emphasised more as a teaching method for driving instructors?**

Yes. Coaching is becoming highly popular in many training and education systems, and implementing it for rider and driver training could result in a higher level of involvement for trainers and instructors who have experience of coaching in other fields. However, some caution should be exercised and coaching should not be considered a miracle solution to the problems and shortcomings of some training programmes. In addition, coaching should prove its effectiveness before it is implemented; through research and quantitative analysis of licencing statistics.

In addition, it is essential to consider that driver training is first and foremost a business. There is a complex relation between profitability and success rates at licencing tests; there is a financial interest in enrolling trainees into longer programmes and achieving high success rates for advertising purposes. Therefore, changes in training methodology, including the introduction of coaching, must result in better training and not in making tests or training more difficult – which would only encourage longer and more expensive training, possibly with less relevance to real world conditions.

There is evidence to suggest that trainees place as great an importance on information acquired from peer groups than on information from instructors, which supports the implementation of peer reviewing.

## **5. Should post-test practical experience models be encouraged?**

Yes. There is a variety of voluntary post-licence training courses available throughout Europe: From simple, almost cost free "refresher courses" organised by motorcycle clubs, to highly advanced, track based courses, costing up to 400 Euros or more per day.

Voluntary post-licence training is extremely useful for those attending, but at present the impact of these courses is insignificant, simply because only a minority of European motorcyclists take up these offers.

The need for voluntary post-licence training is closely connected to the quality of basic rider training: If basic rider training is insufficient, there may be a greater need for voluntary post-licence training, perceived as an alternative solution. If such courses are to be effective, there is a need for instructors to be shown to be competent through officially recognised registration schemes. However, attention should be paid not to create an additional layer of administrative complexity; nor to encourage the implementation of different rules in different members states, which would create inequality between citizens.

As long as there are major improvements to be made in initial rider training, FEMA can see no need for mandatory post-licence training. However, mandatory "remedial" training of traffic offenders through rider improvement courses could improve their attitude and hazard perception skills.

Motorcyclists who participate in road safety oriented, voluntary post-licence training should be rewarded with a discount on their insurance premium.

## **6. Should accompanied driving systems be encouraged? Should they be harmonised at EU level?**

Yes, accompanied driving systems should be encouraged, and no, they should not be harmonised at EU level. FEMA supports pre-licencing experience through unaccompanied or accompanied riding depending on the local laws of the Member States, and opposes a European harmonisation of accompanied driving/riding systems.

Provisional licencing systems, which exist in several Member States and include pre-licencing experience, have produced positive results and should not be dismantled in the name of harmonisation. Where the legislation allows it, motorcycle riders or car drivers who have already demonstrated a satisfactory level of competency should be allowed practice unaccompanied.

**7. Should accompanied driving systems with 'lay instructors' be encouraged? Should there be training requirements for lay instructors?**

Yes. Accompanied driving with lay instructors should be encouraged, as it can be of great value, especially where infrastructure or resources are poor and qualified instructors are in short supply. However, this must be supported by local government, in order to ensure the best outcome for the end user at minimum cost and complexity for all concerned.

In implementing large-scale accompanied driving schemes, attention should be paid not to create de facto discrimination against drivers coming from families without a car, or where a lay instructor is unavailable. In a context where access to category A or B licence is often a pre-requisite for professional integration, it is essential to make sure citizens remain equal when training for a licence.

No formal requirements should be placed on A-licencing accompanied driving, other than having held an A licence for at least five years, and being required to be on the same motorcycle as the learner rider.

**8. Do you agree that the minimum age of solo driving (with a category B licence) should be 18?**

No. A European harmonisation of the minimum age of solo driving is not desirable at the moment.

The Third Driving Licence Directive coming into effect in 2013 defines minimum ages for riding different categories of powered two-wheelers. It would ill-advised to enforce new regulations before the impact of this legislation has been assessed, as it would only add confusion and complexity. In any case, there is no data to support that a higher minimal age would reduce accident risk or casualties.

**9. Should more use be made of computer-based training systems? If so, in which areas?**

Yes. The conclusions of the Initial Rider Training (IRT) EU Research Project underlined the expected benefits of simulator-based and computer-based training systems. These benefits include better risk awareness, more experience of complex real-life situations, and equal access to training.

An e-Coaching programme running on users' personal computers would be an attractive solution for offering equal access to training in hazard perception and correct attitude and behaviour in traffic. This e-coaching programme would be a particularly attractive method for trainees from the ages of 15 to 40, who are more likely to be familiar with computer-based tools.

It is ideal for training hazard perception and avoidance and correct attitude and behaviour in traffic. With such a programme the trainee could be exposed to hazardous situations without real danger to the trainee or other road users. Situations that would rarely occur in real life could be easily produced and replayed until the trainee can handle the situation safely. Observing the performance of the trainee and giving feedback would be easier and more illustrative within an IRT e-Coaching programme than it would be in real life.

Computer-based hazard perception training could also be offered for category B licence trainees. It would be especially beneficial when focusing on vulnerable road users perception training.

#### **10. Should more use be made of e-learning? If so, in which areas?**

Yes. In addition to the elements mentioned in (9), e-learning could include training on rules and regulations, hazard perception, and laws of physics, leading to a better understanding of efficient riding techniques. E-learning has a huge potential for theoretical and practical training, but requires more research and development to assess its effectiveness and clarify its best use.

The conclusions of the IRT project give a good and comprehensive overview of the possibilities of e-learning for driver and rider training.

### **B. Comments on the recommendations listed in the report**

#### **The Goals for Driver Education (GDR) matrix**

- **The GDR matrix** shows great potential if combined with the recommendations and content of the Initial Rider Training (IRT) project. In particular, the modular approach of IRT could be easily and efficiently integrated to the GDR matrix.

- **Training focusing on higher goals** has to acknowledge the variety of social, cultural and economic factors that determine driver and rider decisions. For this approach to be successful, or even meaningful at all, it is

essential to take into account the representations and perceptions of the road environment promoted by the variety of economic actors.

Advertising by vehicle manufacturers and spare parts producers plays a key role in shaping the emotional relationship between users and the road environment; often promoting reckless behaviour and race track-style driving. Likewise, car- and motorcycle-focused media, in print or TV format, often sends mixed messages by supporting road safety messages, while featuring dangerous stunts and glorifying racing skills. These factors are deep-reaching in today's society, and carry enormous economic interests and impact. Therefore, a training programme focused on drivers and riders' perception and motivations should take these elements into account, preferably through far-reaching policies aimed at promoting positive behaviour in advertising and in the press.

### **Additional controlled practice**

- **More practice on roads** and better practice are desirable, but more is not the same as better. The cost of motorcycle training is already crippling in some countries, and the new Third Driving Licence Directive for motorcycles can cause redundant training in stepping up to another license. Therefore, a modular approach (IRT) should be privileged, with a focus on life-saving skills.

- **The recommendation not to teach pure skills training "to avoid overconfidence"** must be clearly identified as a measure affecting car drivers only. Maneuvering skills (braking, turning, swerving, etc.) are usually the first and foremost safety measure for most riders; especially against the largest cause of car/PTW accidents: error or attention failure on the part of another driver.

### **Reducing high risk exposure**

- **Lower speed limits** can put at risk the driver or rider who cannot follow the traffic flow. It would prove especially dangerous for motorcyclists, who would be put even more at risk by being passive and forcing other drivers to overtake them. Moreover, young motorcyclists are already discriminated against by being limited in engine power: adding speed limits would be redundant and entirely unnecessary.

- **Night-time driving ban:** FEMA is wary of a measure that amounts to a curfew for young citizens, and wonders how it could be presented as not being discriminatory. The measure would be a simple ban on driving and riding for a month every year in Northern Europe. Many young and novice drivers need a vehicle to work, study or even achieve basic mobility: with less than eight hours of sunlight per day in winter in most of the EU, a night-time driving ban would make it impossible for many to lead a normal life.

- **Passenger bans** have not been shown to have a positive effect on road safety. FEMA believes enforcing passenger bans on novice riders would be unjustified and inefficient.

- **Zero blood alcohol limit for young drivers** overlooks the fact that after one or two years under this policy, the referential will be forgotten by novice drivers, who will perceive it as an official message saying that “experienced drivers can handle alcohol”. Such a blatant inequality cannot be perceived as anything but discriminatory. If the objective is not understood by the population, it will not be followed. In improving young driver safety, tougher legislation cannot be a substitute to training and education.

In addition, such a measure with doubtful efficiency should not be implemented at the expense of other initiatives which have demonstrated their potential, such as better training and improvement of infrastructure.