

FEDERATION OF EUROPEAN MOTORCYCLISTS' ASSOCIATIONS

3rd EUROPEAN ROAD SAFETY ACTION PROGRAMME

Halving the number of road accident victims in the European Union by 2010

A shared responsibility

(COM/2003/311 final)

The Federation of European Motorcyclists' Associations is the representative federation of powered two-wheeler users across Europe. FEMA represents the interests of 22 citizens' national associations by the European Union and the Transport Division of the United Nations Economic Commission for Europe. FEMA is playing an active role in the road safety debate in these arenas.

This position paper responds to the European Commission's 3rd European Road Safety Action Programme (3RSAP) in view of its further consideration by the Council of Ministers and by the European Parliament and of its implementation at EU level, in the Member States and in the accession countries.

In 2001 FEMA made a detailed response to a consultative document on road safety ("A Partnership for Safety") issued by the Directorate-General for Transport and Energy of the European Commission. In spite of the delay of the proposal, FEMA welcomes the ambitious road safety target set by the Commission to reduce road deaths by 50% by 2010 and the higher awareness about the safety needs of vulnerable road users. FEMA accepts that such goal can only be reached through "shared responsibility", with the active involvement of the institutions and of all interested stakeholders at European and National levels within their respective competences.

Within this spirit, FEMA supports the approach of addressing the areas of road user behaviour, safer vehicles and improved road infrastructure and in particular the proposed exchange of best practices. Within these three areas, FEMA wishes to make the following points and suggestions regarding the needs and interests of the riders of powered two-wheelers specifically identified by the European Commission in the 3rd Road Safety Action Programme.

I. Road user behaviour

• Motorcycle Helmets

FEMA recognises that in some EU Member States, there is a degree of deliberate non-compliance with the national helmet laws. This situation is more prevalent in southern countries, and may be partly due to the high temperatures, particularly in the summertime.

The effect of wearing motorcycle helmets is two-fold. Firstly, there is the significant contribution helmets make to the reduction of head injuries sustained by riders in road traffic accidents ("overall the risk of fatal injuries more than halves when a helmet is worn. Head injuries are reduced, if the helmet is correctly latched in order not to lose it in the event of an accident"¹). Secondly, there are some significant negative effects, which need to be addressed:

¹ "Integration of needs of moped and motorcycle riders into safety measures", review and statistical analysis in the framework of the European research project PROMISING, Work-package 3, 2001.

- (a) Noise, which has a detrimental and sometimes permanent effect on the riders hearing. This often manifests itself in the form of tinnitus.
- (b) Weight, which in an accident, can contribute to neck and spinal injury (“of all casualties who suffered a head impact, 55% sustained a head injury and 20% a neck injury”²).
- (c) Heat, which under some conditions, especially in Mediterranean countries, can impair the rider’s ability to concentrate.
- (d) A reduction in the field of peripheral vision experienced with some designs.
- (e) The vision limitations due to misting, scratching, and ingress of dirt into the visor.

FEMA also recognises that there is widespread ignorance of the criteria which determines a crash helmet’s effectiveness. Modern helmets act by absorbing shock. Once subjected to a shock, it should be discarded. Many people are unaware of this and continue to wear a helmet, which will afford them little, if any, protection. Others will continue to wear the same helmet unable to afford the price of a new unit. This gives the appearance of compliance with the law, while making the law impotent.

FEMA supports the proposed promotion of crash helmet usage through awareness campaigns and the use of fiscal incentives such as reduced VAT rates designed to make helmets more affordable and thereby encouraging greater use. FEMA recommends the EC should fund research with a view to cost-effectively improve from a user’s perspective current regulation ECE R22.05 on motorcycle helmets.

- Rider Training

In the past FEMA supported the European Commission, within the Second European Driving Licence Directive, in defining and developing the skills and knowledge needed to obtain a licence. FEMA also had EC support for funding a project which examined and made recommendations on initial (pre-licence) rider training in Europe. The project concluded that there were serious shortcomings and even when there were developed training arrangements, they frequently concentrated on machine control skills without considering fundamental issues such as hazard awareness and avoidance and rider attitude and behaviour.

Over two years ago, in conjunction with Fédération Internationale de Motocyclisme and the Association des Constructeurs Européens de Motocycles, FEMA made an application to the EC for a project on the development of a European model for initial rider training. Despite very close consultations with Commission officials an initial proposal was rejected under the Commission’s then new procedural rules. Following its resubmission it was not considered until the following financial year when a new set of rules had been introduced. The Commission demanded that the application be resubmitted again in a form that complied with the new rules. FEMA was finally advised on the 24th September 2003, some two-and-a-half years after submitting the original application, that despite it fulfilling the quality criteria the application had not been selected and had been put on a reserve list.

FEMA wishes the European Commission supported the efforts of the motorcycling community to improve the quality and effectiveness of initial rider training, which would help to meet the road safety target set by the 3rd European Road Safety Action Programme.

II. Safer vehicles

- Anti-lock Braking Systems (ABS)

Current motorcycles have greater stability, more responsive steering, more effective controls, improved ergonomics for better control and improved reliability compared to those of even a decade ago. Brakes are significantly more powerful but braking on a motorcycle remains an action which requires proper training and experience, in particular in slippery road conditions. The progressive introduction of ABS systems as optional equipment on top of the range motorcycles has been welcome by the riding community as an aid in braking, and manufacturers are progressively optionally fitting these systems also on mid-range models as an answer to

² “Unfall und Verletzungssituation bei Motorrollern”, Otte, 1998.

the market's demand. Nevertheless, ABS systems are still expensive compared to the total price of low-range vehicles and require special training in order to make full use of their potential.

FEMA recommends advanced braking systems such as ABS to become progressively available as optional equipment on all PTWs at affordable prices through voluntary commitments with the motorcycle industry and in parallel with an appropriate revision of the rider training schemes.

III. Improved road infrastructure

- Directive on Black-spot management

FEMA supports the proposed directive aiming at the harmonisation of the criteria for identifying “black spots”, and the means of making their presence known to users. As a note, FEMA believes that identification should be the first step towards dealing with particularly dangerous road infrastructure situations, and not an excuse for not dealing with them. To this end, the Commission proposes the adoption of harmonised Community signs and motorist information.

FEMA recommends the Commission to define with the users a dedicated harmonised sign for identifying specific traffic situations that whilst do not potentially create a problem to dual-track vehicles can be a particular danger for motorcycles (already in use in some Member States).

- Crash barriers

FEMA welcomes the inclusion in the 3RSAP of a commitment to pursue the development of a new harmonised European standard on the basis of the existing EN 1317 on road restraint systems (crash barriers or guardrails) which would take into account the need of motorcyclists. FEMA wishes the recommendations it made in 1999 within an EC project on improved crash barriers design to be implemented by the Member States³.

FEMA supports that road furniture and infrastructure were designed from the beginning and subsequently maintained respecting proper international standards and taking into account the needs of all users, including motorcyclists.

The European Parliament widely supported “improved mobility for (...) motorcyclists through institutional investment, subsidies and legislation reflecting this preference” (White Paper on Transport Policy 2002-2010). In June 2003, the Council of Ministers underlined “the urgent need to give special attention to the needs of vulnerable road users – such as pedestrians, motorcycle riders, moped riders, and cyclists, as well as young and elderly persons and people with disabilities- which should be duly reflected in Member States road safety policies”. FEMA wishes these points to be included in the EU 3^d Road Safety Action Programme strategy and promoted at EU and National levels. FEMA also supports the possibility for stakeholders to sign up the European Road Safety Charter and demands this possibility to be open also to organisations representing users in order to further contribute to the development and circulation of best practices in the European Union.

Version: 19th November 2003

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³ “Final report of the motorcyclists and crash barriers report”, FEMA, 1999