

# Position paper on the training and testing of motorcyclists



The National Motorcyclists Council (NMC) is the UK coalition of motorcycling representative organisations, which works together on commonly held positions about issues where motorcyclists seek to inform the debate and change or influence government policy. It also researches issues to both inform campaigning and support the individual work of its members. The NMC's mission is 'Working together to help assure a positive and sustainable future for motorcycling'.

Until February 2021, motorcycle rider licencing was subject to regulations set by EU directives, with various iterations of the directive having been in place over the time of the UK's membership of the EU. The current directive is known as '3DLD'. It ceased to apply in the UK on January 31<sup>st</sup> 2021. Although UK licensing law remains aligned to European law, there is now an opportunity to review and revise the regulations to better suit UK circumstances under the framework set by the 1968 Vienna Convention on Road Traffic.

The NMC's position on licensing is based on the following principle: To make the licensing regime easier to understand and access, while maintaining appropriate road safety standards in training. The NMC does not propose a dilution of testing and training standards, but it does propose a decrease in the amount of arbitrary 'box-ticking' bureaucratic steps that faces novice motorcyclists and create a system which is simpler to understand and access, while maintaining the UK's high standards.

Training and testing regulations need to fulfil a basic mission – to make motorcycling safer. The NMC has studied the casualty data over the period since 1991. This reveals that both 2 and 3DLD have failed to make motorcycling safer in a majority of seven headline statistical measures in the areas of casualty numbers and casualty rates per mile travelled.

The NMC proposes for the UK system to more closely align with the international norms as set out in the Vienna Convention on Road Traffic, which are recognised world-wide – including by the EU.

The NMC position can be summarised as follows:

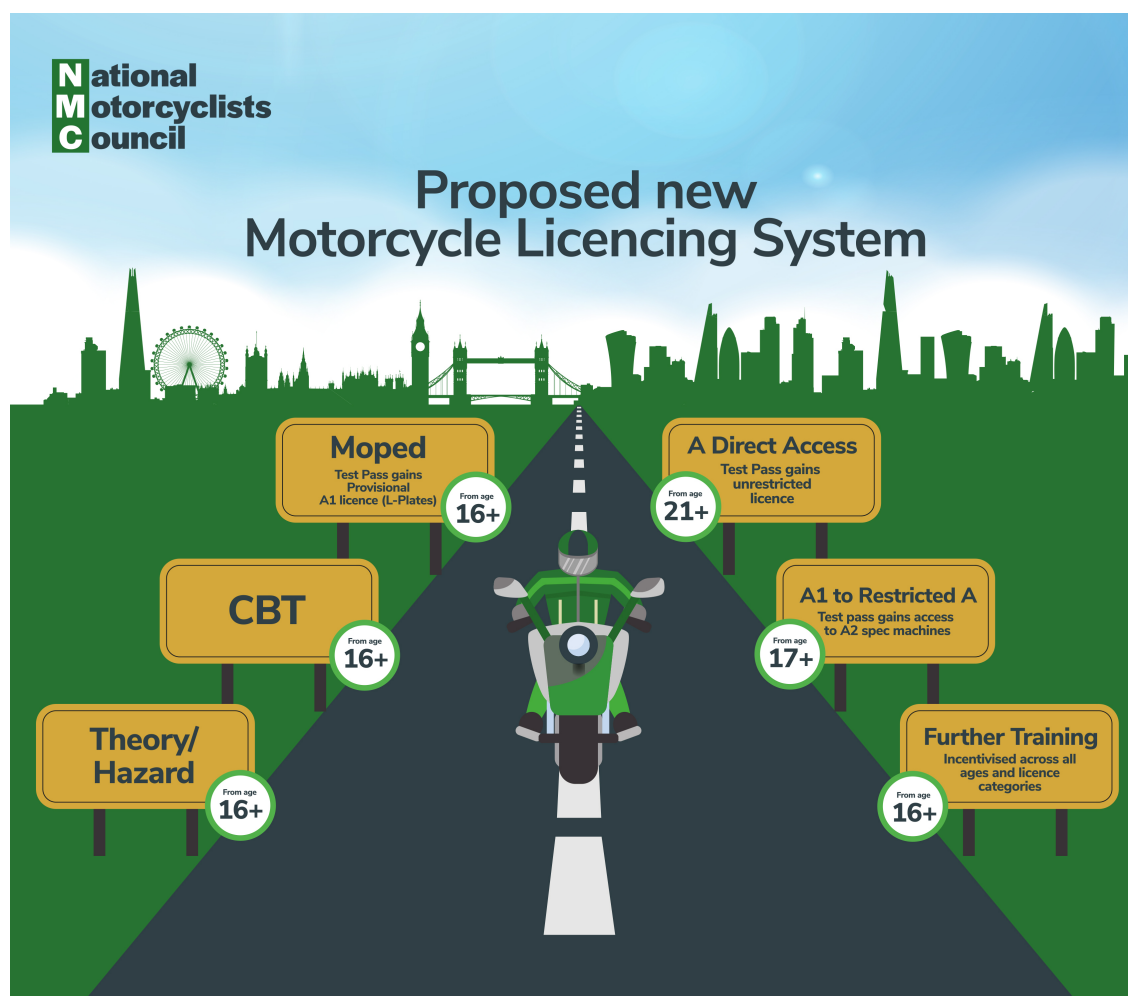
1. Improved CBT syllabus. Theory & Hazard Perception test to be taken and passed before CBT.
2. Licensing needs incentivisation; via training upgrades from a lower to a higher category rather than repeat testing to move between licence categories on the progressive licencing route.
3. Each licensing step should also allow access to machines up to the minimum test vehicle specification for the next category of licence (to be ridden on L-plates). This should also apply to those who gain full moped licences aged 16.
4. A return to a single event test, rather than the current two-part format.
5. Abolition of A2 licence. Passing the motorcycle test for A1 to grant access to an A licence. However, as per the 1<sup>st</sup> stage of 2DLD, this licence will be restricted, gaining access to the

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current A2 specification of machine. The restriction will be lifted once riders complete a compulsory skills training course – which will be available from one year after the test is passed.

6. Direct access minimum age to return to 21 years old.
7. Access to post-test training also needs further incentivisation
8. Minimum test vehicle specification for electric motorcycles needs to be redefined for each licensing category.
9. All changes to licensing to maintain alignment with the Vienna Convention and maintain high overall safety standards to ensure the continued exchangeability of licences for those moving away from the UK.

The NMC emphasises that as part of this ‘evolution’ of testing and training, there should be no dilution of standards, or removal of aspects that work towards safer motorcycling. But instead, best practices need to be applied more intelligently, so that riders are incentivised and encouraged to get a full licence.



National Motorcyclists Council. August 2021

## **The NMC Position in more detail**

### **Background to the legislation.**

With the UK having left the EU, there is an opportunity to reshape the motorcycle testing and training system to more closely align to the specific needs of UK motorcycling and the country's transport needs as it looks to support lower polluting and congesting transport.

Previously, the UK was subject to regulations imposed by the EU's various Driving Licence Directives (DLD). The first notable impact of these was via the Second Directive (2DLD) in 1997 which introduced 'stepped licensing' in a basic fashion. It replaced a previous system which allowed moped access at aged 16 and larger bike access from aged 17, with a test on a 125cc motorcycle gaining access to all motorcycles. The Compulsory Basic Training (CBT) regime was also in place (from 1991). Until 2001, failure to take and pass a motorcycle test within two years of receiving a provisional licence was rewarded by a one year ban from riding motorcycles. This was repealed after it was shown to be discriminatory.

#### The Second Driving Licence Directive

2DLD introduced the following steps in 1997. This was a partial implementation of the Directive.

- Moped licence from age 16 remained. (plus CBT for all licence classes)
- A1 (125cc) from age 17 A test pass allowed access to a medium power (33bhp) machine for two years, after which access to all motorcycles was automatically granted
- Direct Access option from age 21, with a test pass on a machine of more than 498cc and 46.5bhp, allowing immediate access to all motorcycles.
- An option to upgrade a licence via 'accelerated access'.
- The theory test was introduced in 2001 for all road users.

In 2009, the final elements of 2DLD were implemented. This was a far more complex set of rules which placed requirements on the form of the motorcycle test, requiring in the UK special off road areas for the observation of manoeuvres around cones which in some ways appeared similar to the 'part one' test which was a feature of UK testing during the 1980s until its replacement by Compulsory Basic Training.

Specific requirements of the test meant that after much discussion the test was split into two parts, Modules One and Two. This proved controversial and the then Driving Standards Agency decided to acquire large areas of land to conduct the test, part of which required a 'brake and swerve' manoeuvre at 50kph (31.06 mph) – partly due to this speed exceeding the 30mph urban speed limit. The original plan was for 77 module one test centres, but only 37 were ready when the new test was implemented. The new requirements had a significantly negative effect on the training industry, with this, plus difficulties in getting a motorcycle test, leading to reduced capacity for motorcycle training and licence acquisition.

A review of motorcycle testing between 2010 and 2013, called by the government after the 2010 general election did not result in any notable changes to the basic format of the tests.

#### The Third Driving Licence Directive

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3DLD was introduced in January 2013. The UK government did not support this Directive and abstained on the Council votes within the EU on 3DLD, given the predictable negative impacts on both motorcycling and the training and testing system. 3DLD further complicated access to motorcycling by formalising stepped licensing and introduced the following steps:

- Moped licence from age 16 remained. (plus CBT for all licence classes)
- From age 17, the A1 licence allowing a full licence up to 125cc and 11kw/15bhp.
- From age 19 a new A2 licence allowing a full licence up to 35kw/47bhp on any size motorcycle. The motorcycle test must be done on a machine of at least 395cc with a power output of between 20kw/27bhp and 35kw/47bhp.
- Direct Access to all motorcycles moved from age 21 to age 24. The motorcycle test must be done on a machine of at least 595cc with a power output of at least 40kw/54bhp.
- Progressive Access. This regime allows people to gain a full motorcycle licence at an earlier age by taking the same tests three times on progressively larger motorcycles - provided they wait a full 2 years between tests. Candidates only need to take the CBT and Theory Test once.
- An option to upgrade a licence via 'accelerated access'.

In January 2021, 3DLD was replaced by UK domestic law which currently mirrors the requirements of the Third Directive.

### What affect did 2 and 3 DLD have on safety?

The justification of the EU directives was to improve motorcycle safety. Opinion is divided on whether the desired affect was achieved, but the following table reveals the effect of the DLDs on the UK headline motorcycle casualty record.

2DLD				3DLD				2 versus 3 DLD
PTW Cas Numbers								
	1997	2012	% Change	2013	2019	% Change		
Deaths	509	328	-35.56	331	336	1.52	Limited statistical effect	
Serious	5983	5000	-16.43	4866	5862	20.47	3DLD Negative	
KSI	6446	5328	-17.34	5197	6198	19.26	3DLD Negative	
Slight	18046	13982	-22.52	13555	10026	-26.03	Limited statistical effect	
All	24492	19310	-21.16	18752	16224	-12.64	3DLD Slowed Progress	
PTW Cas Rates								
Deaths	109	108	-0.9	114	104.6	-8.25	3DLD Positive	
KSI	2620	2413	-7.9	2457	2002	-18.52	3DLD Positive	
All	9956	6380	-35.92	6464	5051	-21.86	3DLD Slowed Progress	

The table reveals that on the majority of measures, 3DLD did not improve motorcycle safety – indeed the number of people killed or seriously injured – the most important measures of safety - rose notably, reversing safety gains made during the 2DLD era.

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The NMC therefore contends that compared to 2DLD, the Third Driving Licence Directive, as applied to motorcycles has not met its core purpose 'to improve safety' and is therefore not fit for purpose in the UK.

It is instructive to look at safety progress in the immediate pre DLD era from the period after CBT was introduced. Significant reductions in casualty on all measures were recorded, though small rises in rates per mile were recorded. This illustrates that the correct measures, applied at a purely national level can have a positive, indeed significant effect on casualty numbers. This is not to criticise the motivation behind the EU's efforts in this area – the Union has an understandable and commendable desire to improve motorcycle safety. But the experience of 3DLD in particular reveals the difficulties of a 'one size fits all' approach to diverse national situations and roads environments.

The UK now has the opportunity to 'reset' motorcycle training and testing to fit the UK roads and traffic environment via national regulation.

Pre 2DLD - from CBT Introduction			
PTW Cas Numbers			
	1991	1996	% Change
Deaths	548	440	-19.71
Serious	7954	5768	-27.48
KSI	8502	6208	-26.97
Slight	22249	16925	-23.93
All	30751	23133	-24.77
PTW Cas Rates			
Deaths			
KSI	2538	2653	4.53
All	9179	9886	7.48

### Test Numbers and Motorcycle Use

Prior to the implementation of the second stage of 2DLD, there were an average of 80,852 tests conducted per year between 1998/9 and 2007/08. After the new test was introduced under 2DLD, this average fell to 47,783 (2009/10 versus 2017/18). This comparison is made between the pre 2009 test and Module 2, given that both tests were/are the final test before gaining a full licence. (Module 1 data tends to follow Module 2 fairly closely.)

An average of 49,807 Module 1 tests have been conducted since its introduction in 2009.

Motorcycle PARC data reveals that since the first stage of 2DLD was introduced in 1997, the number of motorcycles on UK roads rose by 41.1% over the 1998/9 to 2017 period. Since the introduction of the new motorcycle test, this has risen by 1%. Over the same periods, the new motorcycle market has fallen by 12.4% and 12.1% respectively, though it should be noted that the new motorcycle market was only 0.3% lower in 2019 compared to 1997. (Sources DfT/MCIA)

Further analysis reveals that the 2008 and after financial crisis combined with lack of motorcycle test availability to hit new motorcycle sales, with these falling by 14% in 2010/11. Since then, new motorcycle sales have risen by approximately 10%. (MCIA)

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The data reveals that the new motorcycle test has significantly hit full licence test availability, while in the meantime, the PARC data has remained stable and new motorcycle sales have made some recovery from the impact of the new test and other external factors. It is also known that the sale of second hand motorcycles has remained strong since 2009/10. This analysis does not include Covid-19 pandemic effects, though these are known to be profound on all measures.

We therefore have a picture of lower numbers of full licences gained due to reduced test provision against a backdrop of sustained and slightly increased overall interest in motorcycle use, particularly since 2012. In other words more motorcycling, fewer tests taken.

This, combined with notable market increases in 125cc and lower machines, suggests that many riders are simply renewing CBT and not taking the next steps to acquiring a full licence. The safety impact of this is clear to see.

### Other Factors

The implementation of the two part test under the latter stages of 2DLD, plus 3DLD changes, turned UK testing and training on its head which had a profoundly negative effect on the training industry. There was significantly reduced access to training and as illustrated above, a much reduced testing capacity. The logjams caused in the early days of Module One testing via multi purpose test centres, which struggled to meet demand, has never been fully resolved and long waiting lists are the norm for motorcycle tests, with training schools sometimes having to partake in daily negotiations with the DVSA to secure tests.

Although the DVSA is much criticised on this point, the NMC does appreciate that the situation is partly as a result of changes forced by the implementation of EU directives, 'colliding' with other changes of DVSA business. Some would argue this was self-imposed given the form in which the Government chose to implement the test elements of 2DLD and 3DLD – certainly the Parliamentary Transport Select Committee was highly critical in its 6<sup>th</sup> Report of Session 2009-10.

But the NMC contends that we are where we are and we now need to look forward given that the UK now has the opportunity to create positive change to the testing and training regime. The DVSA has indicated that it is open to new ideas, which is very welcome.

This opportunity must not be squandered.

## Evolution, not Revolution

The NMC does not advocate ripping up the entire system and starting again. Whatever the UK does, it will need to meet the requirements of the Vienna Convention as a contracting party and much has been learned in recent years from the experience of both 2 and 3DLD, not all of it negative.

The experience of implementing and managing the testing regime under the EU DLDs has taught us much about what works and what does not. Considerable change to UK licensing, including how testing and training is done was imposed from 2009 onwards. Much of this appeared to make some sense, but in others, the way the UK implemented the Directives gave rise to significant problems in testing provision and application, not least the need for new estate to conduct part one of the two part test. Availability of tests and backlogs have been an ongoing issue, enhanced by the Covid-19 pandemic. The statistical analysis above speaks for itself.

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That said, the UK enjoys high standards in testing and training and it is essential this continues for reasons of road safety. Though it is now possible for the UK to introduce changes which make testing and training more accessible, easier to understand and with requirements that appear less onerous – while maintaining and improving in many cases improving standards and engagement.

## International Law.

Licence requirements are set by international convention, via the 1968 Vienna Convention. For motorcycles, there are two categories noted; category A Motorcycles and category A1, Motorcycles with a cubic capacity not exceeding 125cc and a power not exceeding 11kw (Light Motorcycles). The Convention does not prevent jurisdictions from creating further categories or requirements, but these may only be valid in the territory where they are applied, for example, the EU and UK licence Category A2 is not recognised in the Convention. The NMC has received reports about people who have found their A2 licence to be invalid when trying to hire or use a motorcycle in some countries outside the EU.

Vienna allows a lot of flexibility for training and ‘verification’ of skills. Indeed, it only specifies that this should take place, with very limited specific detail about how it is done:

### Article 41 – Driving Permits

1. (a) Every driver of a motor vehicle must hold a driving permit;
- (b) Contracting Parties undertake to ensure that driving permits are issued only after verification by the competent authorities that the driver possesses the required knowledge and skills; the persons authorized to check if drivers have the necessary knowledge and skills must have appropriate qualifications; the contents and procedure of both theoretical and practical exams are regulated by national legislation;
- (c) Domestic legislation must lay down requirements for obtaining a driving permit. In particular, it shall specify the minimum ages for holding a permit, the medical conditions to be fulfilled and the conditions for passing the theoretical and practical exams;
- (d) Nothing in this Convention shall be construed as preventing Contracting Parties or subdivisions thereof from requiring driving permits for other power-driven vehicles and mopeds.

### Validity in other countries which are ‘Contracting Parties’.

Article 41 goes on to state:

2. (a) Contracting Parties shall recognize:
  - (i) Any domestic permit conforming to the provisions of Annex 6 to this Convention; (*style of the driving permit*)
  - (ii) Any international permit conforming to the provisions of Annex 7 to this Convention, on condition that it is presented with the corresponding domestic driving permit (*style of international driving permits*,

as valid for driving in their territories a vehicle coming within the categories covered by the permits, provided that the permits are still valid and that they were issued by another



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Contracting Party or subdivision thereof or by an association duly empowered thereto by such other Contracting Party or one of its subdivisions;

(b) Driving permits issued by a Contracting Party shall be recognized in the territory of another Contracting Party until this territory becomes the place of normal residence of their holder;

### Exclusions

Vienna does not apply to learner driver permits and in the case of motorcycle licences, Contracting Parties may refuse to recognise the validity of a licence issued to someone under the age of 18.

### In Summary

The UK is free to evolve the motorcycle testing regime any way it chooses, provided this meets the requirements of the Vienna Convention of which the UK is a Contracting Party, if it wants licences to be recognised internationally. The EU, as a Contracting Party cannot refuse to recognise changes to UK licence requirements, as long as they comply with Vienna Convention requirements.

However different countries within the EU can take a view on licence exchanges. Therefore, high quality testing and training must remain and continue to be enhanced - but within a less complicated framework of licensing.

Therefore, the NMC urges the Government to evolve training in testing along the lines of what the UK requires, not what the EU currently does, or is planning to do. The higher rules for both the UK and EU when it comes to riding licences is equally dictated via international convention and there is no legal or practical reason to maintain alignment with the EU DLDs, except perhaps for maintaining recognition of the A2 category of licence for visiting riders from EU member states, given the EU's proximity to the UK.

## More Detail on the NMCs specific Proposals

### Improved CBT syllabus. Theory & Hazard Perception test to be taken and passed before CBT.

The NMC supports the provision of online training and testing for the driving theory test and also hazard and risk perception. The Driver and Vehicle Standards Agency (DVSA) has already consulted on proposals to improve the syllabus for Compulsory Basic Training and implementation is only dependent on secondary legislation in parliament. The NMC approves of the proposed changes.

We recommend that theory testing and hazard perception testing is completed prior to the CBT course.

The CBT system is still largely manual. Full implementation of a system comparable to MoT certification is essential. Also, it became obvious in the pandemic that the inability to extend the life of CBT certificates caused hardship to those unable to repeat CBT. Changing this will require legislative adjustment.

With regard to the Covid-19 pandemic, there are 'learnings' from this. Systems need to be more flexible. The NMC does not agree that extending the life of a CBT certificate is necessarily a road safety issue. Those disadvantaged in the pandemic were those who ride regularly for work and therefore 'in practice'. Enforced breaks in riding are more likely to create higher risk on return to the road.



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### Licensing needs incentivisation, via training upgrades, not repeat testing to move between licence categories on the progressive licencing route.

Licensing upgrades should be done via a training package instead of requiring candidates to repeat the same test as often as three times. Nothing new is learned by repeating the same test again and again. This acts as a disincentive to progression.

The DVSA has been making welcome improvements to enforcing training quality which make this a feasible option. Not only would this remove test repetition but it provides an excellent opportunity to reinforce basic training at minimum and at best to provide more advanced training.

### Each licensing step should also allow access to machines up to the minimum test vehicle specification for the next category of licence (to be ridden on L-plates). This should also apply to those who gain full moped licences aged 16.

The NMC supports a change in the licensing scheme such that passing the Moped test will gain access to A1 machines (with L Plates). Similarly for the proposed 'Restricted A' category, successful A1 test candidates should be able to ride machines of A2 specification on a full licence before undertaking further training to gain access to all motorcycle types. This would provide incentive for riders to take a test.

Implementation of the graduated licensing scheme resulted in disincentives to riders to progress through the staged licence categories. The first of these is that passing the A1 or A2 test only means that a rider can use the same category machine that the test was taken on. This is particularly obvious with respect to the A1 licence; there is a proportion of riders who, rather than taking a test for a full licence, which gains them little in practical terms, simply retake CBT every two years. The benefits of taking the full test are only removal of L-plates and the possibility of taking a passenger. Normally it makes no difference to the rider's insurance premium, indeed that can go up. With respect to licence upgrades few discern much benefit from repeating exactly the same test, just on a bigger machine, with the result that many wait until they can take the Direct Access route.

### A return to a single event test, rather than the current two-part format.

Currently the test is divided into 2 parts; Module 1 off road for basic bike handling skills and Module 2 for on-road competency.

The NMC supports a reversion to the single test module that was in place prior to implementation of the second stage of 2DLD. This would simplify administration of riding tests, remove the requirement for off-road areas, and keep costs down.

A barrier to this has been the speed requirement for the so-called brake and swerve element of the Module One. This exercise should be revised while maintaining the training principle that lies behind it - but requiring smaller estate for an initial off road element of a single event test.

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### Abolition of A2 licence and replace with compulsory skills training course by two years after A licence acquisition.

The A2 licence is not recognised under international law and is a peculiarity of the EU system. Its introduction has not led to improvements in motorcycle safety, but it has added to the perceived and actual complications of the 'stepped' route to a full A licence.

The NMC proposes that this licence class is abolished and replaced with a system where riders wishing to progress from A1 to A will be required to undertake a specific training course, which would become available from one year after passing their A1 test (which would gain a full but restricted A category licence). This course should be deliverable by both ATBs and the providers of advanced motorcycle training. Completion of this course would derestrict the A licence.

Although deregulatory, this change would be an improvement on the pre 2009 arrangement where the restricted A licence was automatically derestricted two years after passing the A1 test, with no further requirement for training. Requiring a training element would also preserve the principle of licence 'graduation', while removing the bureaucratic and psychological barrier of repeating the same test.

### Direct access minimum age to return to 21 years old.

It is not easy to draw a definitive conclusion from analysing the safety effects of the change from 21 to 24 years old for Direct Access. Although on the face of it, the statistics do show a reduction in casualties in the 21-23 age group, the figures are not granular enough to determine if this is as a direct effect of the 3DLD age change, or if casualties are among a notable cohort with full licences, or whether the effect is through denial of the direct access opportunity from the 21-23 year age group – or other factors.

Safety policy should not be formed on the basis of banning people from using vehicles. Indeed, this is one reason why the pre DLD era 'one year ban' for those who failed to pass a motorcycle test within two years of gaining a provisional licence was repealed

Therefore despite some positive figures (on the face of it) to point to, there is little direct evidence that raising the age of Direct Access to 24 has led to improvements in motorcycle safety overall by itself. But the age change has denied direct access to the A category licence for people in the 21–23-year age group, which is both unique and discriminatory when the age of access to other classes of vehicle licence are considered. For example, a car test pass gains legal access to the most powerful machines from age 17. HGV C and C+ can be accessed from age 21.

The Direct Access minimum age should therefore be returned to 21 years old.

### Access to post-test training needs further incentivisation

Research from IAM RoadSmart shows that advanced motorcycling training is very highly rated by those who have undertaken it. Comparing non IAM riders with IAM riders also shows better safety attitudes and more confidence in their motorcycling. However, access to advanced training from organisations such as IAM RoadSmart and RoSPA, is often limited by volunteer capacity. Advanced riding courses usually require several months of training and a final 90-minute test. These providers are DVSA accredited and new even higher grades of advanced training are now also available.

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Many road safety partnerships have identified motorcycling as a priority road safety area and local schemes have been developed to introduce riders to the concepts of advanced riding. These include Bike Safe, Rider Refinement North (in Scotland) and a variety of local initiatives delivered in a partnership way. The MCIA are also working to promote post test schemes. Most of these schemes are short one or half day courses with a police officer or approved trainer without a final test.

Short course offerings have suffered in the past from a lack of consistent funding and support from police forces across the whole of the UK. The DVSA does offer a 'national' scheme called ERS (Enhanced Rider Scheme) as an introduction to further training. Most courses tend to target those returning to motorcycling and using larger bikes in rural areas. Outside London few projects have been set up to help the youngest riders on scooters and mopeds. The NMC would support a more consistent approach and urges all police forces across the UK to support Bikesafe and deliver it within their area. The NMC would also like to see consistent high profile support and signposting to post test and advanced rider training options by government agencies such as DVSA and the DVLA. This could best be achieved by allowing providers to promote their services via the DVLA licence database.

Many of the main advanced rider training providers offer specially negotiated insurance discounts but the NMC would urge all insurance providers to incentivise take up by offering discounted insurance quotes to those undertaking advanced training.

Attendance at a speed awareness course has been shown to reduce repeat offending among car and van drivers, but no tailor-made course is available for police to offer motorcyclists who may have come to their attention. The NMC would support the development of specific 'alternative to prosecution' courses for motorcyclists caught speeding or engaging in minor careless riding behaviour. These courses should be made readily available across the UK, including in the devolved nations.

### *Action Points - Post test training*

- NMC endorses the safety benefits of post test training and advanced motorcycling
- NMC urges all police forces across the UK to sign up to the delivery of the BikeSafe scheme in their area
- NMC urges all insurance companies to offer incentives to those who take post test training
- NMC would like to see consistent long-term funding from the government to support the Bikesafe scheme
- NMC urges DVLA and other government agencies to endorse post test training by allowing providers to access their rider license databases
- NMC supports the work of the Motor Cycle Industry Association (MCIA) in bringing together post test training providers and promoting consistent standards
- NMC notes that more schemes are required to assist moped and scooter riders in large urban settings
- NMC supports the development and nationwide delivery of specific alternative to prosecution courses for motorcyclists

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### Minimum Test Vehicle specification for electric motorcycles needs to be established for each licensing category.

The NMC welcomes the redefined criteria of ICE powered Minimum Test Vehicles (MTV) for the A2 test. The current criteria for electric MTVs however is unsatisfactory. The inclusion of the 'continuous power rating' criteria, in particular for the A category MTV, makes it impossible to take the test for a full A licence on an electric motorcycle because there are no machines on the market which fit the defined criteria for a minimum test motorcycle.

The NMC understand that fulfilling the current criteria is likely to produce a machine with undesirably fast acceleration. Given that more is now known about the performance of electric motorcycles, the criteria for electric motorcycle test machines needs to be redefined.

### All changes to licensing to maintain alignment with the Vienna Convention and maintain high overall safety standards to ensure the continued exchangeability of licences for those moving away from the UK.

The reasons for maintaining the UK's position as Contracting Party to Vienna are set out above. But in addition, the ability for UK citizens to be able to exchange licenses when moving abroad needs to be maintained. Rules for this differ internationally and the EU itself does not have a common position, with rules on licence exchange differing between Member States. But all countries internationally will need to be confident that changes to our licensing system work towards greater safety.

Indeed, this area in itself offers justification for adopting the proposals in this document, given, as illustrated above, overall motorcycle safety progress under the 3DL regime has if anything moved backwards.

Furthermore, the UK currently enjoys one of the best road safety records on a global level. We urge the Government to make more of the successes the UK has achieved when discussions take place in the international road safety arena. In many areas of road safety, within and beyond licensing, there are UK best practices which should be advocated far more strongly internationally, particularly at UN, OECD and WHO level. CBT is a good example of this.

## Finally

The NMC again emphasises that as part of this 'evolution' of testing and training, there should be no dilution of standards, or removal of aspects that work towards safer motorcycling. But instead, best practices need to be applied more intelligently, so that riders are incentivised and encouraged to gain a full licence at the level they desire.

Changes to the Driving Licence Directives since 2009 as they apply to motorcycles have demonstrably not worked to improve safety. But they have proved to be a barrier to motorcycling.

It is time to think again.

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### About The NMC

The National Motorcyclists Council (NMC) is the UK coalition of motorcycling representative organisations, which works together on commonly held positions about issues where motorcyclists seek to change or influence government policy. It also researches issues to both inform campaigning and support the individual work of its members.

### The NMC's mission:

*'Working together to help assure a positive and sustainable future for motorcycling'*

The NMC brings together a broad spectrum of representative national motorcyclists organisations. These range from riders campaign groups, to motorcycle sport representatives, off road and green roads interests and road safety experts.

### Members

The NMC's current members are the Auto Cycle Union, British Motorcyclists Federation, IAM RoadSmart, the Motorcycle Action Group and the Trail Riders Fellowship. These groups between them, including their affiliates, represent circa 100,000 individual motorcyclists.

**The National Motorcyclists Council August 2021**