

Consultation response to Safety Authority (RSA) Motorcycle Safety Action Plan

Submitted – 23rd June 2009

This document is submitted by “Write To Ride – Right To Ride” in response to the Road Safety Authority (RSA) in respect of a which seeks to obtain the input and views of a broad range of stakeholders on the enhancement of motorcycle safety on Irish roads through the development of a fully integrated Motorcycle Safety Action Plan.

Write To Ride – Right To Ride is a Non Government Organisation (NGO), a not for profit company consulting with motorcyclists in Northern Ireland to identify what issues are important with regards to motorcycle safety and all other matters concerning motorcycling.

Although based in Northern Ireland there are issues contained in the Motorcycle Safety Action Plan that will undoubtedly affect motorcyclists in Northern Ireland. We initially contacted our colleagues in MAG Ireland (The Irish Motorcyclists' Action Group¹) with whom we have maintained links, through previous collaboration both in Ireland and in the European Union.

In motorcycling terms there has always been an “open” border between Northern and Southern Ireland with motorcyclists travelling between the “physical” boundaries, which are both part of the European Union.

Ireland can be seen as being unique with borders contained within the island of two European Union Member States and with sea links to England, Wales, Scotland and France.

Equally, the motorcycling citizen of Europe has access to Ireland and should expect the same level or better conditions for motorcycle safety that is in their own country.

We would surmise that this should include a similar harmonization of licence requirements, motorcycle regulation, both for the motorcycle and the rider, either as an owner or hiring a motorcycle.

Motorcyclists in Ireland as individuals and as a “community”, travel across North and South both for business (commuting) and leisure activities (motorcycle events such as road races – motorcycle meetings (rallies), charity runs and touring). These riders spend money on their visits which can be a substantial source of income to the business community.

We understand that the DOE Road Safety Branch in Northern Ireland is currently initiating a new road safety strategy. Motorcycle safety has been identified as one of the key issues in the problem profile and they will be seeking measures to address this. Thus some our replies would suggest what we would be looking for a similar motorcycle action plan for Northern Ireland.

We would suggest that both “agencies” should be in contact to establish the similarities or differences for motorcycle safety in Ireland as a whole, rather than rely on general information from the Europe Union which may have no significant meaning for Ireland.

The success of any road safety action programme is dependent on ‘Shared Responsibility’. Small contributions in many different areas can offer significant reductions to motorcycle crashes, injuries and deaths.

¹ The views expressed in this document are those of Write To Ride – Right To Ride and do not necessarily reflect those of MAG Ireland.

Any solution must involve riders, not just at the initial stage, nor at the end of the decision making process from agencies but throughout the whole process.

A global workshop initiated by the International Transport Forum (ITS) and the Organisation for Co-Operation and Development (OECD) www.internationaltransportforum.org on motorcycle safety in Norway in June 2008, encourages policy dialogue in order “to enable communication and build mutual confidence, meetings between motorcycle stakeholders and policy makers\road authorities (e.g. forums, councils,) should be established, in order to exchange views, discuss needs and secure the necessary financing\resources for safety counter-measures”.

The emphasis of our response is that there should be nothing in legislation nor legal requirements regarding motorcycles that would hinder the free movement of citizens throughout the Member States of the European Union.

Trevor Baird
Dr Elaine Hardy

info@writetoride.co.uk

Write To Ride - Right To Ride

Table 9.1: Action Plan : Primary Actions

<p>1. (1)</p>	<p>This Action Plan seeks to reduce the proportion, number and severity of motorcyclist casualties occurring on Ireland’s Roads by 2012 through co-ordinated and multi-disciplinary programmes relating to Engineering, Equipment, Enforcement, Education and Evaluation as follows:</p> <ul style="list-style-type: none"> ▪ To reduce the number of motorcyclist fatalities by 57% or better, from a base of the 2004-2006 average of 46 to 20 by 2012 ▪ To reduce the proportion of motorcyclist fatalities from the 2004-2006 base of 12%, to 7% or better by 2012 <p>To reduce the number of motorcyclist injuries by 25% or better by the year 2012, from a base of the 2004-2006 average of 558 motorcyclist injuries per annum to 419.</p>	<p>We commend the approach of a multi multi-disciplinary programmes relating to Engineering, Equipment, Enforcement, Education and Evaluation.</p> <p>This approach is a sensible model to follow especially the inclusion of education but the focus must not only be on motorcyclists.</p> <p>Although the action plan is regarding motorcycling, the term multi-disciplinary should mean other vehicle drivers, this is a long term approach which should be sustainable over many years and receive the appropriate amount of funding.</p> <p>While the objective to reduce road casualties is honourable and important, the measures and solutions that are put on the table are not necessarily the right ones.</p> <p>The focus is on the machine, not on the rider, but, human behaviour is recognised as the greatest cause of road casualties.</p> <p>Motorcycling is complex, there are many aspects of this mode of transport that are not understood, not only by decision makers and legislators, but even within the motorcycle community. There is a constant debate on issues such as survival skills and protective clothing, age of access and risk.</p> <p>The debate about motorcycling as a mode of personal transport needs to be based on evidence and facts for the benefit of the people of Ireland.</p> <p>A further “E” word to add is “engagement” that is engagement with the motorcycle community, individual riders, clubs, groups and associations to either solve issue, improve or promote safety measures so that motorcycling needs are considered as fully as any other transport mode, in the development of transport policy.</p>
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Table 9.2: Action Plan : Engineering, Traffic Management and Planning

Roads Planning and Design / Road Safety Engineering

2.	Review and update Irish Road Design Standards, Traffic Management Guidelines, and Codes of Practice for Highway Maintenance Management so that they reflect the most current and considered thinking and advice on motorcycle safety.	<p>Actions: 2,3,4,5,6</p> <p>These are all viable points however our experience of road engineers, from Ireland, would suggest that they are seeking technical solutions and providing these solutions for the majority of road users. Therefore they are perhaps not looking closer at the concerns of motorcyclists which may be due to lack of knowledge and/or lack of funding.</p> <p>Therefore we are pleased by the comment in point 4 that there is inclusion of a motorcyclist or a member who has particular knowledge of motorcycle safety issues, ideally this person should be able to ride a motorcycle in order to provide practical experience. This can also be reflected in the road infrastructure which does not lend itself to a motorcycle safety solution.</p>
3.	Liaise and work with professional institutes (such as Engineers Ireland) and universities to ensure that roads and traffic engineering courses reflect best international practice / current thinking on safe designs and policies for motorcyclists.	<p>There are a number of excellent documents on best practice to consult:</p> <p>The European Motorcycle Industry has prepared “Guidance for Powered two-wheeler Safe Road Design”:</p> <p>http://www.acem.eu/cms/det_publications.php?det=1045</p> <p>IHIE Guidelines:</p> <p>http://www.motorcycleguidelines.org.uk/home.htm</p> <p><u>Safety of Powered Two-Wheelers: time to act now The European Union Road Federation (ERF) - 2009</u></p>
4.	Continue to ensure, through the Road Safety Auditing processes, that issues concerning motorcyclist safety are considered and incorporated into the design of safety and road improvement schemes. Consider the proposal that for larger schemes or those likely to attract significant numbers of motorcyclists, the audit team includes a member who is either a motorcyclist or has particular knowledge of motorcyclist safety issues.	<p>http://www.writetoride.co.uk/PTW_20Discusssion_20Paper_Final_IF.pdf</p> <p>Vision Zero Roads For Motorcycles - Norway - 2008</p> <p>http://www.writetoride.co.uk/NPRA_Vision_Zero_Motorcycle_Road_2008.pdf</p> <p>MC Safety - Design and Operation of Roads and Traffic Systems - Norway - 2004</p> <p>http://www.writetoride.co.uk/norwayhandbook245e.pdf</p>

5.	Review the existing standards of retro-reflectivity and skid resistance of road markings, with particular consideration for motorcyclists. Refer to best international practice and revise as necessary.	See comments above.
6.	Identify locations with high frequencies of motorcyclist collisions and implement improvement measures to improve motorcyclist safety.	See comments above.
7	Review the operation and layout of signal controlled, crossroads and complex junction layouts with a known motorcyclist collision record.	We support this action.
8.	Work with Local Authorities to identify locations within built-up areas suitable for implementation of 30kph speed limits.	<p>The 'On The Spot' (OTS) study on accident causation, carried out in Great Britain for the Department for Transport, reports that the majority of motorcycle accidents (52.9%) occurred at posted speeds of 30 m.p.h.</p> <p>External speed warning systems such as speed signs already exist and they are there to warn or advise road users of the appropriate speed limits; electronic speed detection systems (cameras) are becoming used more widely throughout the country.</p> <p>They should be an effective deterrent due to the consequences of fines and penalties including bans from driving. Even so, road users continue to ignore signs and cameras and risk having their licences revoked.</p> <p>Crashes can and do occur at low speeds as highlighted in the OTS study, thus ITS speed limiters may not be appropriate in many situations whereby the cause of the crash could be due to <i>inappropriate</i> speed for that particular circumstance.</p> <p>Most motorcyclists respect speed limits and ride sensibly, but evidence suggests that the correlation between "inappropriate" speed and single vehicle casualties is overwhelmingly due to a minority of riders, while collisions with other vehicles are mainly the responsibility of the driver of the other vehicle (see MAIDS report 2004).</p> <p>Ironically, no government, authority or safety organization has addressed</p>

		the issue of motorcycle manufacturers advertising speed and prompting riders to race on the roads like their heroes.
9.	Design and implement street lighting improvement schemes in identified locations (or locations with similar characteristics to those) at which collisions involving motorcyclists have occurred.	We support this action.
10. (52)	Implement 80 safety remedial schemes per annum on national roads with priority given to schemes which maximise collision saving potential for motorcyclists (in addition to those for other vulnerable road users, such as pedestrians).	We support this action.
11. (53)	Put in place remedial schemes at identified motorcyclist collision locations on non-national roads – the number of schemes per annum dependent on the size of the local authority.	We support this action.

Road Maintenance

12.	Coordinate the establishment of a reporting system in all local authorities whereby motorcyclists (and other road users) can alert the appropriate authority to the presence of safety issues such as potholes. This could be through promoting an “1800 number” and / or an email address through the motorcycling community.	We support this action.
13.	Work with the relevant authorities to ensure that all man-hole covers provided on public roads have at least the minimum “polished skid resistance value”.	We support this action.
14.	Work with the relevant authorities to ensure that the appropriate structures, procedures and funds are in place to carry out regular and proactive street inspections in order to provide a rapid response to rectify blocked gullies giving rise to ponding and to repair street lighting	We support this action.

Safety Barriers, Motorcycles in Bus Lanes, Motorcycles in Advanced Stop Boxes

15.	<p>Continue to monitor emerging research on crash barriers and motorcyclist safety. Review existing design guidance and consider issuing interim guidance on crash barrier design (as suggested in Eurorap report of 200858).</p>	<p>A study was carried out by Dekra Germany and Monash Australia regarding crash barriers. (MOTORCYCLE IMPACTS INTO ROADSIDE BARRIERS – REAL-WORLD ACCIDENT STUDIES, CRASH TESTS AND SIMULATIONS CARRIED OUT IN GERMANY AND AUSTRALIA)</p> <p>http://www-nrd.nhtsa.dot.gov/pdf/esv/esv19/05-0095-O.pdf</p> <p>With regards to wire rope barriers, they found that in all simulations the motorcycle slides along the wires until it hits a post, squeezing and trapping the rider's leg against the wires as it does so.</p> <p>One of the motorcycling community's key concerns with wire rope barriers was the possibility of the rider's limb(s) becoming caught in the barrier during a collision. The simulations seem to indicate that this snagging effect occurs for both the rider's leg nearest the barrier. However of greater concern is the snagging of the motorcycle's front wheel on the barrier's posts.</p> <p>This study appears to refute the findings of the Eurorap report that "research does not warrant the inference that they (wire rope barriers) are more or less dangerous than other types of barrier on the market".</p> <p>http://www.eurorap.org/library/pdfs/20081202_Bikers.PDF</p>
16.	<p>Continue to monitor the results of ongoing and future studies (in Ireland and internationally) into the benefits and costs of motorcyclists using bus lanes. Revise, if appropriate, the current policy position.</p>	<p>Since 1995, several authorities in the UK have made permanent a number of experimental Traffic Regulation Orders allowing motorcyclists to use bus lanes. Various monitoring and research projects have been carried out to determine the effects of these schemes on both motorcyclists and other road users.</p> <p>An experimental scheme, allowing motorcycles to use the majority of bus lanes in Northern Ireland, came into effect on 1 June 2004.</p> <p>In London, after years of debate and trials, as from the 5th January 2009, motorcyclists are allowed to ride in the majority of 'with flow' red route bus lanes in London. Guidance to London motorcyclists to minimise the impact of sharing the road space with other vulnerable road users is offered as follows:</p> <ul style="list-style-type: none"> • 'Motorcycles In Bus Lanes' only refers to those bus lanes clearly marked with a motorcycle picture on the signs marking out the bus lane and does not apply to ALL bus lanes. In particular, motorcycles are not allowed into contra flow bus lanes. • Motorcyclists are not permitted to stop or park in bus lanes during its period of operation unless in a designated parking space or in case of an emergency or breakdown.
17.	<p>Review future trials and the results of studies into the shared use (with bicycles) of advanced stop lines by motorcycles.</p>	<p>We support this action.</p>

Vehicle Design and Testing

18.	Monitor and support EU initiatives to improve motorcycle design and braking systems.	<p>To compensate for the tendency of riders to over-brake the motorcycle in a panic-situation, several motorcycle producers have developed anti-lock braking systems (ABS) or linked front and rear applications (Combined Braking Systems).</p> <p>Although the progressive introduction of affordable advanced braking systems (anti-lock braking systems and/or combined braking systems) on all new motorcycles and scooters may help to reduce certain types of crashes, there still needs to be more research to understand the consequences of braking with ABS or Combined systems, whether these brakes may effectively create different dynamics when braking suddenly.</p>
19.	Introduce an NCT equivalent for Motorcycles	<p>According to the Federation of European Motorcyclists Associations (FEMA) position statement “Periodical Inspection of Motorcycles:</p> <p>There is no link between the technical condition of vehicles and accidents: technical failure is the primary cause of motorcycle accidents in only 0.7% of all cases.</p> <p>Periodical inspections would not produce additional safety benefits It is in the interests of the motorcyclist to reduce any possible risk of accident and to maintain his/her vehicle</p> <p>Motorcycles travel less kilometres in their life cycle than cars or Heavy Good Vehicles (HGVs), and mainly in weather conditions that are much less damaging to the technical condition of the motorcycle</p> <p>The limited amount of emissions produced by motorcycles compared to other motorised road users does not justify the inclusion of Powered Two-Wheelers (PTWs) in the Roadworthiness Directive.</p> <p>Methods to control emissions and fight against pollution already exist: Motorcycles have been subject to EU emissions limits since 1999 and now comply with Euro 3 standards.</p> <p>http://www.fema.ridersrights.org/docs/FEMA_RWTPaper_2008.pdf</p>
20.	Monitor and review existing and emerging research into the impact of the use of larger vehicles (such as Sports Utility Vehicles) on motorcyclist safety – and the safety of other vulnerable road users prior to formulating a policy on this aspect of car design.	We support this action
21	Monitor and review existing and emerging research into the impact of thicker windscreen pillars, the use of tinted windows and possible hazards of rear light clustering arrangements in car design on motorcyclist	We support this action.

	safety, prior to formulating a policy on this aspect of car design.	
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Protective Clothing

22	Continue to support the enforcement of helmet wearing among all motorcyclists. (See also the sections below on enforcement and education)	The Department for Transport (GB) has issued guidelines for helmets. The scheme is called SHARP and is the Safety Helmet Assessment and Rating Programme for motorcyclists. SHARP enables riders to more easily select a helmet which matches their needs. It provides consumers with an independent assessment of the safety performance of helmets sold in the UK. The SHARP RATING reflects the performance of each helmet model following a series of advanced laboratory tests and rates helmets from 1-5 stars. SHARP now offers a single, easy to understand rating for helmet models available within the UK.
23	Support the reduction / removal of VAT on motorcycle helmets so as to further encourage motorcyclists to wear them.	We support this action.
24	Support collaborative initiatives by user groups, trainers and motorcycle (equipment) retailers promoting the correct fitting of helmets.	We support this action.
25	Monitor future research on safety helmet design and introduce, as appropriate, new technical standards for helmets which would protect motorcyclists better.	See comment to action 22.
26	Consider the introduction of a Safety Helmet Assessment and Rating Programme that reflects the performance of each helmet model following a series of advanced laboratory tests and rates helmets from 1-5 stars 59.	See comment to action 22.
27	Re-examine current and emerging research on safety visors with a view to formulating legislation which would prohibit the use of visors that transmit less than	The objective of this action appears to prove that 'dark' visors are a cause of casualties to formulate legislation, is a foregone conclusion. But the examination of current and emerging research suggests that this action has no foundation.

	50% of visible light ⁶⁰ .	
28	Support the reduction / removal of VAT on approved high visibility clothing, upper and lower body protective clothing and boots and gloves so as to further encourage motorcyclists to wear them.	<p>Too much focus on brightly coloured clothing removes attention away from far more important factors that can prevent collisions between cars and motorcycles, namely:</p> <ul style="list-style-type: none"> • Better awareness: theoretical and practical hazard perception tests must identify motorcycle awareness as a fundamental part of the testing regime of car drivers; • Better training: extend the testing and training of car drivers to look for vulnerable road users, including motorcyclists; training and awareness techniques for motorcycle riders; • Improvement of data collection: preventative information, casualty and accident statistics, accurate data and realistic definitions;
29	Amend Road Traffic Legislation to allow Gardaí to prosecute riders who are not appropriately dressed (e.g. in shorts and sandals).	<p>In terms of mitigating factors for injuries, the On The Spot (OTS) study carried out in Great Britain on behalf of the Department for Transport, (Feb. 2008) reports that protective clothing including helmets had no effect on the severity of the injuries incurred by riders. There were no significant effects of countermeasure on the accident severity rating.</p> <p><i>Source On The Spot study, DfT 2008, page 52 Table 4.39; (ISI: Injury severity index)</i></p> <p>The motorcycling community is safety conscious and riders have purchased protective clothing worth hundreds of thousands of pounds, therefore the use of personal protective equipment should not be made compulsory.</p> <p>Furthermore, the response to a questionnaire by BikeSafe Northern Ireland, demonstrates that the overwhelming majority of motorcyclists use correct protective clothing (between 80.5% to 96%) depending on the type of clothing.</p>
30	Introduce regulations for the mandatory wearing of sleeved high visibility upper body clothing for rider and pillion passenger.	<p>What evidence is there that Hi Visibility jackets will reduce casualties?</p> <p>In November 2004, the DfT published a report called Behavioural Research in Road Safety. The report covers a variety of studies which focus on specific causes to road accidents. One of these studies is called 'An in-depth case study of motorcycle accidents using police road accident files' by the authors DD Clarke, P Ward, W Truman and C Bartle.</p> <p>The most significant finding of this study with regards to right of way violation (ROWV) accidents, suggests that in particular, there is a marked problem with other road users observing motorcyclists. This is the phenomenon whereby drivers overlook a motorcyclist in the immediate foreground seems to be in agreement with the work of Mack and Rock (op. cit.), whose theory of 'inattentive blindness' showed that subjects may be <i>less</i> likely to perceive an object if they are looking at it directly than if it falls outside the centre of the visual field. 'Inattentive blindness' is suggested by research to be affected by four main factors: conspicuity, expectation, mental workload, and capacity</p>

		<p>(page 8).</p> <p>‘Some results would seem to permit the discussion of conspicuity and expectation. The fact that many motorcyclists in our sample appear to be trying to make themselves more conspicuous but are not seen nevertheless lends credence to the idea that there is something amiss in the cognitive processes of the other involved driver. The ‘expectation’ factor, in particular, raises the possibility that some road users have a poor perceptual ‘schema’¹² for motorcycles in the traffic scene, and therefore do not process the information fast enough when motorcyclists are observed’ (page 14).</p>
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Visibility / Daylight running lights

31	Provide high visibility vests to motorcyclists through promotional efforts with a special focus on regional towns.	See comment to action 30
32	Promote the importance of not obscuring high visibility clothing. Encourage the use of rear-racks or panniers or other means in order to ensure high visibility, especially when viewed from the rear.	See comment to action 30
33	Monitor ongoing and future research into the safety benefits of daylight running lights for motorcyclists, and liaise with user group representatives and other bodies who are for and against the introduction of such practices in Ireland.	<p>According to the Irish National Road Authority (NRA), the most important factor contributing to a large extent to road fatalities in this country (92%) is the behaviour of the road user and the behaviour of drivers contributes to 76.9% of road fatalities. The NRA document highlights two principle causes as excessive and inappropriate speed and driving while intoxicated, whether through drugs or alcohol. Indeed such is the concern of the Irish government that a series of initiatives have been announced by the Minister for Transport:</p> <p>In relation to the justification of mandatory DRL to reduce casualties in Ireland, how effective could DRL be to a person who is intoxicated? If drink driving is a major factor in fatalities in Ireland, how would the introduction of DRL make a difference?</p> <p>An intoxicated driver would not improve their ability to drive carefully, because this type of driver would not be in full control of the vehicle.</p> <p>There is another issue which compounds the debate regarding motorcycle safety. Until recent changes in legislation, car drivers with provisional licences did not even have to be accompanied, which according to the Road Safety Authority, was a cause of numerous motorcycle casualties (14% of all motorcycle casualties) Analysis revealed that the trend in the number of motorcyclists injured each year in collisions involving unaccompanied learner drivers of other vehicles is decreasing</p>

		(possibly due to the change in legislation). In 2006, 59 motorcyclists were injured by unaccompanied learner drivers compared to 157 in 2002. There needs to be more focus on human behaviour rather than relying on passive safety to reduce casualties.
34	Monitor ongoing and future research into the safety (dis-) benefits of the use of coloured headlamps on motorcycles.	See comment on action 33.

Fuel Spillages

35	Work with the relevant bodies, including the media, to publicise the safety implications of fuel spillages with special attention for motorcyclists.	We support this action.
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Speed Issues

36	Research best practice in order to identify viable survey methods to record and report motorcycle speeds and hence quantify and assess the level of non-compliance.	See comment to action 8
37	Support the undertaking of speed surveys at known motorcyclist collision sites where speed was known to be a contributory factor, and support the implementation of measures to address these – such as a programme of installing vehicle activated speed signs to reduce vehicle speeds at these sites and other sites with high motorcyclist activity.	See comment to action 8
38 (26)	Implement a Safety Camera Network which will achieve enforcement, to include the monitoring of motorcycles, in the region of 6,000 hours per month.	See comment to action 8
39 (34)	Prepare and publish technical/engineering guidance for setting local	See comment to action 8

	speed limits paying particular attention to motorcyclist safety issues.	
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Alcohol/Drugs Impairment

40	Support tougher penalties for motorcyclists (and all drivers) involved in collisions whilst under the influence.	We support this action.
41	Seek to improve the recording and monitoring of motorcyclist collisions resulting from excess alcohol or drug intoxication.	<p>In principle we support this action, however, the 'On The Spot' Study (OTS) carried out for the Department for Transport in Great Britain compares the alcohol abuse of motorcyclists in relation to accidents with other road users. As highlighted in the following table, the percentage of motorcyclists involved in accidents was lower (with the exception of goods vehicle drivers) than other road users (2.5% compared to 5.8% for car drivers).</p> <p>However, what is also true is that the severity of the injuries was far greater than other road users, (with the exception of pedestrians).</p> <p>Though alcoholic beverages are frequently available and promoted at events targeted at motorcyclists, the effects of alcohol on judgement and vehicle operation skills are well known among motorcyclists and the vast majority of motorcyclists are cautious about drinking alcohol before riding, which is why most motorcycle events (or rallies) include camping facilities so that riders have the opportunity to stay overnight to 'sleep it off'.</p>
42	Examine the locations of where motorcyclist deaths and injuries have occurred with a view to increasing the frequency at which random breath testing occurs	See comment on action 41.
43	Design and implement programmes of compulsory re-training for motorcyclists convicted of speed or alcohol-impaired offences.	We support this action.

Licensing Issues, Vehicle Excise Duty Evasion and Other Driving Offences

44	Require the enforcement of new legislation which makes it illegal for learner riders to carry passengers.	No comment.
45	Commission a study to quantify the level of motor tax evasion, and review this prior to formulating further actions with regard to improving safety for motorcyclists.	We support this action.
46	Provide or support the provision of publicity aimed at young male riders and other categories of riders (such as those returning to motorcycling) to increase awareness of the consequences of riding whilst uninsured.	<p>The practices of motor insurers in Northern Ireland have made motor insurance inaccessible for those most in need of cheap and efficient transport. Reasonably priced third party insurance for mopeds, scooters and motorcycles could address issues of youth employment and even resolve problems of anti-social behaviour by allowing young people the opportunity of movement and social inclusion.</p> <p>In the Netherlands for example, the calculation of third party motor insurance rates the vehicle only, which means that any person with the appropriate licence and permission of the owner can drive/ride the vehicle.</p> <p>The Netherlands has the lowest third party insurance of all the European countries, whereas Ireland has the highest.</p> <p>Therefore addressing the oligopolistic practices of insurers could be considered to reduce uninsured motorcyclists.</p>
47	Work closely with the insurance industry to ensure an efficient exchange of information on uninsured vehicles.	See comment on action 46.
48	Encourage enforcement which specifically addresses those drivers who persistently offend.	We support this action.
49	Establish a post-conviction training programme for persistent offenders and motorcyclists convicted of drunk riding.	We support this action.

Rider Testing and Training

50	Work with the relevant bodies to maintain a level of 100% participation in a programme of compulsory basic training by motorcyclists.	We support this action.
51	Promote the participation of the voluntary sector in the provision of high quality rider training.	We support this action.
52	Establish a Nationally recognised post-test or advanced riding standard, to be developed in consultation with key stakeholders including training organisations.	We support this action.
53	Establish FETAC accreditation for both motorcycle training courses and motorcycle instructor training courses.	We support this action.
54	Work with the relevant bodies to develop a comprehensive programme of post-test rider improvement training courses, and particularly those geared towards returning-motorcyclists.	We support this action.
55	Liaise with insurance companies and other relevant bodies to promote the provision of discounted insurance for riders undertaking post-test training.	This could be a two-edged sword. The insurance industry may use this to increase premiums for those who do not undertake post-test training.
56	Address the needs of older riders through, for example, (i) the promotion of voluntary participation in refresher courses and (ii) compulsory refresher courses for licensed riders who are unable to demonstrate that they have ridden regularly within the preceding 5 year period.	We support action 56 (i) We do not support action 56 (ii) because this discriminates against motorcyclists. What evidence is there to support the case that motorcyclists are more at risk than car drivers who have not driven for 5 years? The onus or burden of proof for the suggestion of compulsory refresher course if implemented should be on the relevant authorities. The insurance industry increases premiums considerably for those who return to motorcycling to discourage them riding high performance motorcycles.

57	Develop and support the development of Work Related Vehicle Safety practices to promote safer riding by commercial riders.	We support this action.
58	Support the further development of and participation in motorcycle maintenance courses.	We support this action.
59	Increase the hazard perception element in learner permit driver training programmes, to specifically include motorcyclist awareness.	We support this action.

Education

60	Work in collaboration with the Department of Education and Science (DoE&S) and the National Council for Curriculum and Assessment (NCAA) to ensure that the development and implementation of a road safety programme for schools as part of Transition Year contains a significant motorcyclist safety element.	We support this action.
61	Work in partnership with sporting organisations and community groups to implement community-based road safety programmes which include an element of motorcyclist safety.	We support this action.

Publicity, Promotion and Dissemination of Information

62	Implement an annual programme of co-ordinated nationwide (multi-) media/ publicity campaigns aimed at motorcyclists which directly target the main motorcyclist factors of motorcyclist collisions, and the most vulnerable groups.	We support this action.
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63	Implement an annual programme of co-ordinated nationwide (multi-) media/publicity campaigns for drivers which indirectly address the main causal factors in motorcyclist collisions, such as alcohol impairment, speeding and unsafe behaviour <i>towards motorcyclists</i> .	Evidence suggests that in the case of collisions with other vehicles, the car driver fails to see the motorcyclists due to lack of awareness of motorcyclists. This should be included.
64	Develop and support nationwide and multi-media campaigns which match the profile of known casualty groups and seasonal trends.	We support this action.
65	Continue to participate in national campaigns to provide high visibility wear to motorcyclists, supported by media campaigns to increase wearing rates.	We do not support this action, see comments to action 30
66	Undertake a review of the effectiveness of the participation in national campaigns.	We support this action.
67	Ensure that safety materials are available in formats and locations which are accessible to target groups of motorcyclists such as young people.	We support this action.
68	Ensure awareness of the effects of speed on the likelihood and severity of collisions through inclusion in Driver Theory Tests.	We support this action.
69	Undertake a review of road collisions involving motorcyclists and including ethnic groups in such collisions.	Would it not be more appropriate to consider nationalities rather than ethnic groups? This comment implies discrimination.

Road User Attitudes

70	Seek to identify means by which driver attitudes and behaviour towards motorcyclists can be modified to increase consideration, and compliance with traffic laws, particularly with regard to speeding and yielding appropriate priority to motorcyclists at junctions.	We support this action.
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Communication

71	Set up a national forum for Road Safety Officers through which information and experience may be shared on the subject of motorcyclist safety.	We support this action.
72	Engage road users through consultation in order to identify the key safety concerns and problems experienced by motorcyclists.	We support this action.
73	Ensure that the development of a research capability within the RSA includes a specific focus on the causes of motorcyclist collisions, and the effectiveness of measures in reducing such collisions.	We support this action.
74	Support the Road Safety Strategy in working with An Garda Síochána and local authorities in improving the detail, accuracy and reliability of motorcyclist and casualty data. This could include information on the engine size of motorcycles involved in collisions and information on uninsured riding and vehicle excise duty evasion. This will allow for a more comprehensive analysis of the causes and circumstances of motorcyclist collisions to be met.	We support this action.

75	Establish a system to obtain information on the number of riders who complete Compulsory Basic Training and other training / testing.	We support this action.
76	Set up a national database to enable monitoring of the effectiveness of schemes that were implemented for the primary purpose of improving motorcyclist safety, and make this available to local authorities and other roads authorities.	We support this action.
77	Identify which factor(s) contributed to the dramatic decrease in motorcyclist fatalities on two-way single carriage roads in 2006.	We support this action. However, see comments from action...
78	Assist Local Authorities in the setting of local targets for motorcyclist casualty reduction through their Road Safety Plans, and monitor progress towards targets through analysis of the national collision database.	We support this action.