Write To Ride – Right To Ride

Response to - Public Consultation on Driver Training and Traffic Safety Education

European Commission – DG TREN - Road safety unit

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Write To Ride – Right To Ride is an NGO (Non Government Organisation) based in Northern Ireland.

The main aim is to represent motorcycle users at all levels.

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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?**

With regards to PTWs, the 3rd EU Driving licence directive has already established the categories for stepped access to motorcycling, which are varied by age throughout Europe, yet has not defined the type of training to support this directive.

There is no similar system of stepped access for car drivers, therefore there has to be a separation of the type of training system for vehicles, until such time as car drivers are treated the same as motorcyclists – i.e. until such time as car drivers are subjected to the same rigours and categorisation.

Furthermore, the type of training for both car drivers and motorcyclists may vary by age and quality throughout Europe.

Harmonising training would need to consider variables which are related to the conditions of the country - geography, demographics, climate and other factors.

For example training a car driver in the mountains of Sicily would require a completely different method of training than teaching a car driver in an urban area of the Netherlands.

2. Should traffic education at school be mandatory?

As part of social skills in junior schools, traffic education should be part of the curriculum, while in secondary schools there should be encouragement for young people to learn road education.

Using the example of Northern Ireland, there are 29 new mopeds purchased with the backing of the Department of Finance to update the fleet across Northern Ireland schools.

Motor Vehicle and Road Users GCSE is part of the curriculum in Northern Ireland Secondary Schools and has proved a popular choice for students at Key Stage 4.

The Department for the Environment's Road Safety Education Officers in Northern Ireland actively promote the timetabling of GCSE Motor Vehicle and Road User Studies in all post-primary schools and provides all of the teaching resources including a moped for the practical skill training element.

This GCSE was designed to prepare students in Northern Ireland to become better and more informed users. It has the added benefit of providing a qualification accepted by employers and universities.

The subject content of GCSE Motor Vehicle and Road User Studies covers:

- vehicle control and road user behaviour;
- legal requirements;
- road transport and its effects on society;
- motoring mathematics;
- accident procedures; and
- motor vehicle technology

3. Should driving instructors undergo continuing professional development?

Yes, however, the regulation of instructors varies considerably throughout Europe.

Professional development is important, but more important is the regulation of trainers for both car drivers and motorcyclists to determine and establish a minimum criteria for standards.

With regards to motorcycle trainers, in Europe, 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 just teach the skills needed to pass the licence test, instead of teaching the essential skills and knowledge needed to survive on the road.

At present, many initial rider training arrangements in the U.K. only address machine control skills.

They usually focus on the exercises of the national licence test rather than the rider's needs to control a motorcycle on the road.

Rarely do national initial rider training arrangements address the crucial areas of hazard awareness and avoidance or rider attitudes and behaviour.

It is important to identify the key factors in basic training that effectively make the novice rider capable of safely operating a motorcycle in normal traffic conditions on public roads.

a. Learning and understanding the intentions of laws and regulations aiming to promote and maintain road safety.

b. Learning basic rider traffic strategies, such as rider attitude and behaviour, interaction with other road users, speed choice, lane positioning, visual directional control, active hazard search, perception and anticipation.

c. Learning precise and effective machine control skills, based on the laws of physics, enabling the rider to be in control of the motorcycle when accelerating, cornering and braking.

From a road safety and consumer perspective, if basic rider training is comprised of a specific syllabus and methodology as well as competent instructors, the community at large would benefit from a better trained, safer rider and the rider would get a better deal having received quality instruction.

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

The method of developing a driving instructor for cars and motorcycles must be based on best practice.

Therefore if there is evidence to support coaching as a means of developing a competent and successful instructor, then it makes sense to promote this form of teaching, if not, then no.

However there needs to be an analysis of best practices in Europe before choosing this or any other method.

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

If "post-test practical experience models" means advanced training, then yes, this should be encouraged.

However once again, this needs to depend on a number of factors such as type of advanced training for car drivers and motorcyclists taking into consideration cost, availability of training centres and type of training.

With regards to motorcycles, for example, in the UK the police have an advanced assessment course (Bikesafe) which is not training, it is an assessment of the rider's skills and enables the motorcyclist to learn how to progress on the road and read the road.

What needs to be established is whether there is a programme to train the trainers.

If such courses are to be effective, instructors must be competent and recognised through official registration schemes.

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 as a remedy.

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

Learner car drivers should always be accompanied until such time as they have passed the required driving test to obtain the driving licence.

In the case of Southern Ireland, there is another issue which compounds the debate regarding motorcycle safety and the pressure to increase training for motorcyclists.

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 (possibly due to the change in legislation).

In 2006, 59 motorcyclists were injured by unaccompanied learner drivers compared to 157 in 2002.

At the end of 2007, there were 427,724 drivers with provisional licences of which 65,523 are aged 40 years and over (9,054 are aged over 60 years).

The total number of provisional licence holders in the Republic of Ireland represents more than 20% of total licence holders.

In the case of motorcyclists, the opposite is the case, until such time as the motorcyclist has passed the basic test and obtained their A2 licence they should not be allowed to carry a passenger (pillion).

Indeed, in the case of mopeds, the vehicle itself is designed only for one person, so by implication, the moped rider cannot carry a passenger.

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

The purpose of having a lay instructor, which may be a relative or friend, is to enable the learner car driver to benefit from the lay instructor's experience, therefore providing that the learner car driver has passed the required driving test there is no reason not to benefit from another driver's experience.

Also the cost implication of training lay instructors would be prohibitive and could be counter-productive in terms of road safety.

In the case of motorcycles, see comment 6.

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

No - in the UK for example, the minimum age for solo driving is 17.

Accident analysis of road transport has demonstrated that experience is more relevant than age.

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

Computer based training systems should never substitute practical experience, however there are opportunities to use e-coaching to teach basic hazard awareness.

Furthermore these systems can be useful in learning the rules of the road in order to prepare for the theoretical test, however these systems are costly and there may be problems with trainers unable to buy this equipment, thus eliminating a valuable source of experienced instructors.

Manufacturers should not be privileged in providing training with these systems.

If computer based trainings systems become a required form of training, they should be funded by government.

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

See answer for question 9.

B. Comments on the recommendations listed in the report

The Goals for Driver Education (GDR) matrix

- The GDR matrix

In principle, it seems relevant and appropriate – however see response to the following points.

- Training focusing on higher goals

With regards to car drivers:

- 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;

With regards to motorcyclists:

Motorcycle manufacturers advertise irresponsible behaviour such as encouraging riders to use the public roads like a race track and promoting stunts.

The incitement to take risks can be due to the marketing strategies of the motorcycle industry.

With sales videos and websites that encourage riders to do stunts like 'knee down', ‘wheelies’ or ‘stoppies’ or sliding the bike - these are the sort of actions that risk takers tend to enjoy -all those things that create an image of risk.

Advertising is important for the whole motorcycle industry and their products require an emotional acceptance by consumers.

Twenty years ago, the car industry realised that selling speed and power was detrimental to the safety of car drivers and stopped using this type of marketing strategy.

Perhaps the time has now come for the motorcycle industry to “grow up” and realise that mobility for all, should not include advertising that promotes “Action Man” imagery i.e. stunts, speed and power.

The question to ask is: do people buy a type of motorcycle because the industry advertises them, or because there is a market for these motorcycles? There needs to be a debate that includes the industry, regulators and the motorcycle community.

Overwhelmingly, motorcycle magazines are an important commercial part of motorcycling and cover issues from classic motorcycles, racing, maintenance, owner groups and so forth.

However *some* motorcycle magazines can and do give messages that are overtly irresponsible: features relating to ‘doughnuts’ (spinning wheels), reckless riding on the back wheel, encouraging high speeds on public roads and a high risk mentality are not uncommon.

Are these publishers giving the motorcycle public what they want or are they giving them what they think will sell their magazines?

Additional controlled practice - More practice on roads

With regards to motorcycles - The retrospective amendments to the 2nd EC Driving Licence Directive require braking and swerving exercises to be included in motorcycle licence test.

In real life, effective emergency collision-avoidance manoeuvres are amongst the most demanding tasks a motorcyclist can perform, especially in wet conditions, which requires considerable practice and experience.

Therefore collision avoidance techniques should be encouraged.

Evaluation of crash avoidance skills training should include the following elements:

- Braking effectiveness in real-world traffic situations with the various existing and future braking systems.
- Cornering skills and strategies on the road.
- Swerving effectiveness on the road.
- Development of essential mental strategies for safe riding judgement, including visual directional control and an active hazard search, and anticipation.

However, experienced based knowledge shows that such manoeuvres are extremely difficult to carry out in real-life situations, particularly for inexperienced, novice riders.

It requires skills and experience to be able to apply the correct braking force to the two systems. It is also one of the most critical operations, especially in panic situations.

A typical error in a panic situation is generally the incorrect use of the brakes, causing the wheels to lock and the tyres to lose grip.

Riders often fail to avoid collisions through insufficient use of braking force because of the fear of over-braking and losing control.

In an accident scenario the rider is confronted to a fundamental surprise, where the instinctive reaction is to try to stop rather than to take avoiding action.

Because the rider is looking at the car, the result of this reaction is to collide with the car.

One of the co existing conditions during fundamental surprise situations is most often that of fear.

In a fundamental surprise situation only those actions that are instinctive or which can be performed without command will be used (in an emergency, you will only do what you know), any strategies that need any conscious thought processes will immediately be abandoned.

Hence, just knowing about a strategy will not be sufficient for that strategy to be implemented in an emergency.

- The recommendation not to teach pure skills training "to avoid overconfidence"

See above -

Reducing high risk exposure- Lower speed limits

With regards to motorcycles, 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.

The table below considers the 'type of vehicle/object hit' by all accidents where the precipitating factor was attributable to a motorcycle: most motorcycle accidents occurred at a posted speed limit of 30 mph.

Posted speed in motorcycle accidents

Posted Speed	Frequency
<30 mph (excluded from model)	2
30 mph	109
40-50 mph	37
60 mph	39
70 mph	15
Missing (excluded from model)	4

Source: OTS Study 2008, Department for Transport

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 Europe.

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.

Crashes can and do occur at low speeds as highlighted in the OTS study, thus reducing speed limits may not be appropriate in many situations whereby the cause of the crash could be due to *inappropriate* speed for that particular circumstance.

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.

Ironically, no government, authority or safety organization has addressed the issue of motorcycle manufacturers advertising speed and prompting riders to race on the roads like their heroes.

- Night-time driving ban:

What purpose would there be in banning learner drivers at night-time? How could they learn how to drive at night-time if they banned?

Also, geographical conditions would severely restrict learner drivers (and learner motorcyclists) for example in Northern European countries – night time could be 24 hours of the day in winter.

- Passenger bans

In the case of lay instructors – how could the police differentiate between a lay instructor and a passenger? Not only, by banning passengers (in cars) the learner would not benefit from the knowledge of a more experienced driver – who may be the passenger.

This is impractical and unrealistic.

In the case of motorcyclists, see answer to question 6.

- Zero blood alcohol limit for young drivers

While there must be enforcement to discourage drivers with excessive limits of alcohol, zero blood alcohol limits is unrealistic.

What if for example, the driver has eaten a meal containing a small amount of alcohol?

This would show up on a breathalyser even though the level of alcohol may not have the slightest effect on the driver.

There should be an established minimum of alcohol content for ALL drivers, because older experienced drivers are just as much a problem.

Equally, there should be an established minimum criteria for drugs when driving.