

## **FEMA Position Statement on Road Worthiness Tests**

### **Statement on the European Commissions Proposal for a Regulation on periodic roadworthiness testing for motor vehicles and their trailers ([2012/0184 \(COD\)](#)) and repealing Directive 2009/40/EC**

- **The harmonisation of testing frequencies lacks any justification**
- **The proposal works against the principle of subsidiarity**
- **The evidence presented is neither representative not sufficient to justify the onerous economic and regulatory burdens of the proposal**
- **The proposal is disproportionate to the size of the problem**

Until now only “motor vehicles having at least four wheels” (Directive 2009/40/EC) were covered by an EU Directive making provisions for periodic roadworthiness tests (RWT). Therein for cars the minimum testing frequency was set at four years and thereafter every two years.

The proposal of the European Commission, published on 13<sup>th</sup> July 2012, explicitly includes not only motorcycles but all powered two- or three wheelers, as well as trailers into periodical testing regimes. For new vehicles the Commission proposes the first inspection after 4 years, followed by a second inspection two years later and thereafter annually. Nine member states of the European Union (EU), as well as EEA member Norway, will have to comply by introducing roadworthiness testing for motorcycles for the first time and almost all member states will have to newly integrate mopeds, scooters and light trailers into testing regimes.

Only a minority of member states have inspection schemes with annual test intervals. All other EU (and EEA) members will therefore have to increase the testing frequency for vehicles older than 6 years from biennial to annual. For the users of powered two wheelers in Europe the proposal causes additional annual costs of €1.2 billion , calculated with an average inspection cost of €50 and based on the assumption that 70% of the 35 million powered two wheelers in circulation in Europe are older than 6 years.

Since the proposal also aims at harmonising test standards most inspection bodies in Europe will have to purchase new equipment and to invest in training measures for testers. As a result vehicle inspections are likely to become significantly more expensive which increases the annual financial burden for the users of powered two wheelers up to 2 billion euros per year.

The European Commission declares that “solid investigation results show that 8% of the accidents involving motorcycles are caused or linked to technical defects” (see recital 7). The only study available in Europe that has delivered such a result is a study performed by the German testing organization DEKRA (DEKRA 2010: Motorcycle Road Safety Report). As the business model of DEKRA is based on testing as many vehicles as often as possible the Commission can be blamed for having relied on data which is not based on objective scientific principles.

A similar study, which was performed by the Swedish Transport Administration only found that 3% of fatal accidents involving motorcycles are caused or linked to technical defects. An in-depth study on motorcycle accidents (MAIDS 2004) which was co-funded by the European Commission, indicates that only about 1% of the accidents involving motorcycles are caused or linked to technical defects.

However, the impact assessment of the Commission fails to demonstrate a causal link between increased inspection intervals and a reduction of dangerous technical defects or road deaths.

Many countries without mandatory RWT for motorcycles are some of the best performing in Europe regarding motorcycle accidents statistics, especially Denmark, Finland, the Netherlands and Norway. Apparently, there must be other, more effective measures to prevent accidents than introducing RWT with increased test frequencies throughout Europe. Due to a lack of technical defects Sweden has even decided to skip annual RWT for motorcycles in 2004 and re-introduced biennial testing intervals. So far, this decision has not had negative effects on Swedish motorcycle accident statistics.

The integration of light powered two wheelers into RWT will cause problems especially in remote areas of the European Union. Some users of mopeds and scooters, which have a designed speed limitation of 45 km/h, will be forced to ride over 100 kilometres just to reach the nearest inspection centre. The decision about vehicle categories to be tested as well as on test frequencies should therefore be left to the Member State.

FEMA criticises the Commission for leaving aside the objective that vehicles registered in one Member State could be tested in another (see Article 4 (1)) while proposing to include powered two wheelers into RWT along with increased testing frequencies for older vehicles without providing convincing evidence that the proposed measures significantly improve road safety.

The Commission's proposal does not affect people who can afford to buy a new vehicle every 3 or 5 years. But it strongly affects European citizens owning vehicles older than 6 years, which is especially the case for low income and middle class families as well as for motorcycle enthusiasts who tend to ride and maintain several older motorcycles.



Brussels, October 2012

In Brussels, Dublin, Helsinki and in many French cities on 22<sup>nd</sup> September 2012 tens of thousands of motorcyclists have protested against the proposal and expressed their disappointment with the European Commission, which in their views is trying to solve a non-existent problem and placing unnecessary additional financial burdens on them.

The European Union and especially the European Currency Union are facing threatening crisis and Europe's citizens are losing faith in the European institutions. Thus it is intolerable that the Commission proposes a regulation which will cause billions of additional costs while lacking solid scientific evidence that effective improvements in road safety can be achieved.

FEMA therefore calls the European Parliament and the Council to reject the proposal of the European Commission.

Note: EEA countries without mandatory RWT for motorcycles are Belgium, Denmark, Finland, France, Greece, Ireland, Malta, Netherlands, Norway, and Portugal.

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### **The Federation of European Motorcyclists' Associations**

The Federation of European Motorcyclists' Associations (FEMA) is the representative federation of motorcycle (comprising all powered two-wheeled vehicles) users throughout Europe. FEMA represents the interests of citizens' national organisations at the European Union and agencies of the United Nations. FEMA's primary objective is to pursue, promote and protect the interests of motorcyclists. FEMA recognises that motorcycles have different characteristics from other vehicles and emphasises the need for motorcyclists' specific requirements to be addressed.

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