

## **Annex C – Response form**

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Please note:

The Department will prepare and publish a summary of all the responses to this consultation letter. Copies of individual responses may also be made available to anyone that requests them.

I am content for a copy of my response to be made available if requested. Please note that if you ask for your response to be kept confidential this will only be possible if it is consistent with our obligations under the Freedom of Information Act 2000

\*please delete as appropriate

Your comments on the following, together with supporting information if available, will help us to refine our impact assessment and provide evidence to inform ongoing negotiations on the proposal.

## **i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

### **Simplification**

The simplification of the legal framework is welcomed in order to reduce its complexity.

As mentioned in the Department for Transport's (DfT) impact assessment, the EC has identified - in line with recommendations from CARS21 – that the existing system for L-category vehicles is too complex and that there is scope for simplification and international harmonisation. The logic of simplification is explained in item 2.1 of the DfT's impact assessment.

However, we would like the DfT to consider the CARS21 final report (page 17), the following comments are noted:

“In the context of the general principles of better regulation already agreed at EU level, the CARS 21 High Level Group has focused on the key areas which it considers to be of specific importance to the automotive regulatory framework. These concern mainly the quality of regulations, the need to simplify legislation, the use of impact assessments, the recourse to stakeholder consultation, the lead-time provided in new regulations and the choice of the most appropriate instrument”.

Thus, within the first recommendation of the CARS21 High Level Group,

“i) Principles concerning the quality of legislation”, the fourth bullet point is fundamental to the proposals and accordingly, it would appear that the Commission and the Rapporteur for the IMCO Committee have gone well beyond their remit in proposing regulations in relation specifically to safety but also in relation to technological issues such as On Board Diagnostics.

Bullet point four states:

- *“All automotive legislation should be performance-oriented, technology-neutral, and overprescriptive regulations should be avoided.”*
  - *The principle that regulations should only fix objectives in terms of measurable performances, not solutions, should be strictly respected. If there are exceptions, the criteria to accept them should be given”.*

On page 20 of the CARS21 final report, the following item and bullet points within the first recommendation are noted:

### **“vi) Principles concerning the choice of instruments:**

- *“Alternatives to regulations should be considered, including market-driven solutions and voluntary agreements. After fully assessing their effectiveness (performed at the same time as impact assessments), the full range of instruments (e.g. agreements, labelling, incentives, mandatory standards etc) that could be used to*

## **i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

*achieve the required objectives should be considered. A better balance should be struck between traditional 'regulatory push' policies (by which the Community forces higher standards by means of legislation imposed on industry) and new 'demand pull' policies (by which Member States stimulate consumer willingness to pay for new technologies), while ensuring the integrity of the internal market. Choosing the right instrument should include considering whether to regulate at all.*

- *Well-designed voluntary agreements, particularly those that encourage changes in consumer behaviour, can in some cases deliver public interest objectives in a quick and effective way”.*

We have singled out these recommendations from the CARS21 final report because this is what the EC had signed up to and had agreed to as the basis for the proposed regulations on The Approval And Market Surveillance Of Two- Or Three-Wheel Vehicles And Quadricycles.

Accordingly, we will base our responses on these principles.

### **Advanced braking**

In the DfT's impact assessment the data in relation to EU fatalities are reported as follows: "In 2008, 5,520 riders of powered two-wheelers (PTW) died in European road accidents". The DfT's impact assessment also mentions million kilometres travelled, however, as the authors of this document will be aware, this calculation (million kilometres travelled) is not an exact science when measuring motorcycles. In the event, the fatality statistics which forms the basis of the EU Commission's proposals on safety have been taken from a European Transport Safety Council (ETSC) (2008) document.

However a document, "Towards a European road safety area: Policy orientations on road safety 2011-2020" from the European Motorcycle Industry (ACEM)<sup>1</sup> appears to contradict these figures which are referenced from the ETSC (2007).

The data based on ETSC figures also appear in the Commission Staff Working Document –  
"Accompanying document to the Proposal for a Regulation Of The European Parliament And Of The Council On The Approval And Market Surveillance Of Two- Or Three-Wheel Vehicles And Quadricycles" from October 2010<sup>2</sup>.

Whereas the ACEM document was published in February 2011 and it indicates that: "In recent years, there has been a dramatic growth in the use of PTWs, with increases of up to 400% in cities such as Rome and Barcelona."

The report indicates that "Notwithstanding the significant increase of the PTW fleet and

<sup>1</sup> [http://www.acem.eu/media/d\\_Policyorientationsroadsafety\\_\\_ACEM\\_22973.pdf](http://www.acem.eu/media/d_Policyorientationsroadsafety__ACEM_22973.pdf)

<sup>2</sup> <http://www.europarl.europa.eu/document/activities/cont/201011/20101130ATT03848/20101130ATT03848EN.pdf>

## **i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

of the kilometres driven by PTWs, combined with their greater vulnerability, it is clear that a relative improvement in motorcycle safety has been made.”

While ACEM accepts that “compared to other modes of transport, PTWs have shown a slower rate of improvement with a reduction of 14% in all PTW fatalities in a context of a 17 % increase in the parc (the greatest boost of all vehicle parcs) over the period 2001-2008.<sup>3</sup>”

The authors of the ACEM report highlight that “Moped safety has improved. Between 2001 and 2008, there have been 41% less moped fatalities, an important reduction in quite stable circulating parc. Moped riders have made the greatest achievements in terms of safety in comparison to all road users.”

They also indicated that “Motorcycle rider fatalities have experienced a -1% decrease, however it must be highlighted that the MC fleet raised (increased) by +37% for the period 2001-2008.<sup>7</sup>” What this suggests is that in terms of exposure rates, motorcycle fatalities have decreased far more than the absolute numbers suggest.

The statements by the DfT, the rapporteur of the IMCO Committee and the Commission indicate that “In 2008, 5,520 PTW riders died in road accidents<sup>4</sup>”, and that, “In contrast to other vehicle types these figures for L-category vehicles have remained static or even slightly increased.”

However, this statement is contradicted by the same ETSC - “Countdown to 2010 - Only two more years to act! 2nd Road Safety PIN Report” which states the following:

“At least 6,200 Powered Two Wheeler (PTW) riders were killed in road crashes in 2006 in the EU 25.”

Thus, n.6,200 fatalities in 2006 less n.5,520 fatalities in 2008 is a decrease of 11% or n.680 fatalities over two years.

This reduction of fatalities over this period is not what the DfT, the IMCO rapporteur and Commission documents state, which is that fatalities have remained static or even slightly increased.

As there are no further figures available from 2010 to compare to in terms of European statistics for motorcycle fatalities, it is not possible to determine whether there has been a further reduction in fatalities throughout Europe. Using the DfT data for fatalities in 2010 in GB, it shows that there were 403 fatalities which was a reduction of 15% over the previous year (2009). However in the impact assessment, the DfT has only referred to the previously year’s reduction of 4% in fatalities (2009 compared to 2008).

<sup>3</sup> ACEM’s figures are drawn from the OECD Road Transport Research Programme [International Road Traffic and Accident Database \(IRTAD\)](#)

<sup>4</sup> [http://www.etsc.eu/documents/copy\\_of\\_copy\\_of\\_copy\\_of\\_2nd%20PIN%20Annual%20Report%202008.pdf](http://www.etsc.eu/documents/copy_of_copy_of_copy_of_2nd%20PIN%20Annual%20Report%202008.pdf)

## **i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

The industry (ACEM) has indicated that the increase in cost to motorcycles for the fitment of ABS would be 10% for larger models and 30% for the smaller PTWs.

Furthermore, ACEM had previously stated, that, "A legislative approach would be detrimental to the variety of systems currently being developed by industry, potentially freezing innovation in the area of "advanced braking systems" and "Mandatory antilock braking systems, applied on new vehicle architectures, would unnecessarily raise the vehicle market price to levels unaffordable for the potential market." (We understand that there has been a change in ACEM's position on ABS brakes in that the industry now supports mandatory ABS braking systems).

However, ACEM also states that they were already aiming for a large-scale deployment of all advanced systems (75% objective by 2015) on all PTWs (motorcycles). That is 75% fitment of ABS two years before the proposal's 2017 deadline giving a further two years to achieve the deployment of all advanced systems. This of course is offering the option of ABS (Advanced Braking Systems) fitted on the motorcycle that the consumer wishes to purchase.

On the basis of the ETSC fatality statistics which everybody appears to be citing, the IMCO rapporteur observed that: "High costs and the perception that ABS might reduce the "sporting" character of motorcycling have been a factor in consumer resistance". We believe that rapporteur's observations are unfounded and incorrect.

The latest model of BMW's S1000RR is claimed to be the German company's first venture into modern superbikes or motorcycle with "sporting" character. This motorcycle can be fitted with optional electronic rider assistance systems.

It is possible to buy as optional extras, electronic rider assistance systems: Race ABS (Antilock Braking System) £870.00 and DTC (Dynamic Traction Control) which is only available with Race ABS (Antilock Braking System) (£1325.00), DTC adjusts engine torque to the current level of grip. Also available is Gear Shift Assist (£325.00) which allows the gearbox to change up gears without any discernable interruption to the power delivery.

The total cost of a sports package with Gear Shift Assist, DTC traction control and Race ABS (Antilock Braking System) is £1360.009 therefore according to the manufacturer, the cost of taking the "full package" is greatly reduced.

The BMW S1000RR also comes with launch mode, power mode with 4 performance settings. The ABS (Antilock Braking System) functionality changes with the power mode selected, coming in sooner in Rain mode, then intervening nearer the tyres' limits with each mode change towards Slick. One of the modes, "Slick" mode automatically allows the turning off the rear brake ABS (Antilock Braking System) while maintaining any benefits of the front wheel ABS (Antilock Braking System).

The Honda CBR1000RR which is classified by Honda as a Super Sports, is fitted as standard with an electronically controlled Combined ABS10. According to Honda this is

## **i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

a revolutionary innovation for a bike in this class and is the first Combined ABS to be designed specifically for a super sports motorcycle.

It is worthwhile noting that the ABS system fitted to the BMW S1000RR is called a "Race ABS" therefore enhancing performance for riders and marketed to show that ABS (Antilock Braking System) is not the preserve for touring or non sporting motorcycles.

Therefore it would seem that these motorcycle manufacturers have moved away from marketing ABS (Advanced Braking Systems) as a safety option to an option that enhances the "sporting" character of motorcycling or added assurance.

In fact we would assume that BMW, Honda (as well as KTM and Kawasaki which also offer these systems) have carefully done their market research so that this type of sports bike or bike with sporting ability, will be bought by the market segment it is targeting.

These motorcycles technological "enhancements" appear to be developed and marketed thus and not under the "banner" of technological restrictions. However as identified above, the additional cost of ABS is substantial and as mentioned, the increase of between 10% and 30%, will impact on the final price to the consumer.

The fact is that whether the fitment of ABS refers to equipped or optional is not really relevant in the sense that there is another important issue which many seem not to have picked up on and that is the issue of the switch, which has entered into the discussion. As ACEM pointed out "Today the on/off button for ABS is permitted by the EU legislation. In the present text of the new proposal there is no mention of prohibiting it. The Commission has no intention to prohibit it, on the contrary.

Thus, even if ABS (Advanced Braking Systems) are made mandatory, manufacturers could continue to offer "on road" motorcycles. For example, the BMW S1000RR which are already fitted with a mechanism to allow certain aspects of the fitted ABS (Antilock Braking System) to be switched off, depending on the settings selected by the rider or manually switched off e.g. the KTM 990SMT ABS or the BMW GS Enduro range. In any case, the proposal also includes amendments to exempt Trail and Enduro bikes from the fitment of ABS.

Having a switch would imply that the rider could at any time, deactivate the ABS which would be a sensible thing to do in conditions such as off road or where the road may be covered in gravel, mud etc. In other words, the switch would enable the motorcyclist to make his/her own judgement in relation to safety conditions.

Therefore, it is our opinion that Advanced Braking systems should be left to the industry to develop on a voluntary basis as highlighted in the recommendations of CARS21 specifically : *Well-designed voluntary agreements, particularly those that encourage changes in consumer behaviour, can in some cases deliver public interest objectives in a quick and effective way.*

**i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

**Tailpipe emissions**

We agree with the DfT's impact assessment.

**Evaporative emissions**

We agree with the DfT's impact assessment.

**Durability requirements**

We agree with the DfT's impact assessment.

**On-board diagnostics**

In reference to the LAT study that the Commission carried out with regards to On Board Diagnostics: Study on possible new measures concerning motorcycle emissions. Final Report – Revised Version Report No: 08.RE.0019.V4 Thessaloniki, September 2009. Page 111 (and also page 14)

**“3.3.4.6 Conclusions**

Using the 2020 as a time horizon compared to the 2012, used in the previous study improves the cost-effectiveness of the OBD introduction. The reason is that the probability of severe malfunctions increases with age and, therefore, the emission benefit of a system that could diagnose these malfunctions increases.

However, there are significant uncertainties of this calculation as it largely depends on a scenario of emission malfunction probability and not solid experimental data on the behaviour of actual motorcycles. There also continues to be a difficulty in the technical implementation of catalyst efficiency monitoring in motorcycles because the technology from passenger cars is not directly transferable to motorcycles (operation range, transient performance, thermal gradients, etc.).

Furthermore, the LAT report continues “Motorcycles have a wider engine speed range, the catalyst thermal gradients are larger due to both the operation of the engine and the position of the catalyst, while the WMTC driving cycle does not include steady-speed modes that would enable the same OBD monitoring strategy with passenger cars. This does not mean that OBD monitoring is technically impossible but extensive calibration will be required to introduce OBD for motorcycles at this stage.

The recommendation from the current study is, again, that other measures have a higher priority than the introduction of OBD. This means that durability regulations and roadworthiness procedures need to be first established. These will provide better information on the actual degradation and malfunction probability of motorcycles. After such information becomes available, one would be in better position to reassess the

## **i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

introduction of OBD for motorcycles.

As this country (UK) already has MoT along with many other European countries, the recommendations of the LAT report appear to be relevant and appropriate (and applicable)".

Therefore, we believe that On Board Diagnostics should be left to the industry to develop on a voluntary basis as per the recommendations of CARS21, specifically: *Well-designed voluntary agreements, particularly those that encourage changes in consumer behaviour, can in some cases deliver public interest objectives in a quick and effective way.*

### **Access to repair information**

We agree in principle that independent repairers should have access to information however the car industry (specifically the RMIF) in the UK has differentiated between level one information and level two information which may contain security codes and which may allow a thief or unscrupulous mechanic to use that information in order to steal the vehicle or damage the system. We would suggest that a similar system such as that set up by the RMIF in the UK for a registration of users be implemented for the motorcycle sector.

### **Anti-tampering requirements**

We agree with the DfT's assessment of the cost benefit analysis for anti-tampering, however further to this analysis, we have been in correspondence with the Commission (DG Enterprise and Industry), specifically with Mr Gielen and Mr Jean on anti-tampering measures as well as on various aspects of the proposals. The correspondence between ourselves and these gentlemen in relation to the anti-tampering requirements took place over 2010 and we established firstly that there was no evidence of a widespread problem which the Commission (Mr Jean) acknowledged and in the case of tampering of mopeds and small motorcycles, we pointed out that these were already subject to anti-tampering measures.

In September 2011, we reported on the failure of the Transport Research Laboratory to identify "harmful tampering" which we offer as further evidence that the so-called problem does not justify the anti-tampering measures that the Commission aims to introduce<sup>5</sup>. Further to this, we would like to highlight the fact that the Commission has yet to define the anti-tampering measures and subsequently the identification of positive modifications which are allowed.

<sup>5</sup> <http://www.righttoride.eu/regulationdocuments/MovingtheGoalPosts190911.pdf>



**i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

**Approval of components which affect functional safety or environmental emissions**

We agree with the DfT's impact assessment.

**In-service conformity checking**

The most appropriate method of checking conformity has been discussed and identified in the LAT report is periodical technical inspection or road worthiness test – (MoT). Final Report – Revised Version Report No: 08.RE.0019.V4 Thessaloniki, September 2009, specifically, please refer to pages 12 and 13 of the report.

The recommendations of the LAT report “The current analysis confirms the decision reached in the Moto\_105 proposal<sup>6</sup> not to introduce an IUC procedure for power two wheelers. The reason is the limited effect this is expected to have, compared to the difficulty in locating representative vehicles.

We agree with the LAT report's assessment that the more appropriate method of check conformity should be carried out through regular road worthiness test or MoT.

**CO2 and fuel consumption**

We agree with the DfT's impact assessment.

In additions, we would expect this information will be considered by the DVLA when applying tariffs for road tax, i.e. that L category vehicle owners should benefit from reduced CO2 emissions and fuel consumption.

**Repeal of 74 kW power limit**

We agree with the DfT's impact assessment

**Daytime running lamps**

There is a voluntary industry agreement regarding AHO that has been in place since 2002.

The reasoning behind this mandatory introduction appears to be that motorcycle manufacturers who are not part of motorcycle industry in Europe (ACEM) do not have to equip their motorcycles with AHO, even though they are obliged to conform to whole type vehicle approval. So the logic behind this proposal seems to aim to reduce competition from extra-EU manufacturers.

Irrespective of this, ACEM manufacturers have the largest share of sales in Europe. Therefore if the majority of (ACEM) motorcycles have been fitted with AHO since 2002,

<sup>6</sup> [http://ec.europa.eu/enterprise/automotive/mveg\\_meetings/motos/meeting8/moto\\_105.doc](http://ec.europa.eu/enterprise/automotive/mveg_meetings/motos/meeting8/moto_105.doc)

### **i. The technology assumptions and cost estimates in the Impact Assessment (IA);**

this infers that the majority of motorcyclists ride with their headlights on during daylight. It follows therefore that not seeing a motorcycle would not be the common cause of collisions with motorcycles. By using the Commission's same logic, AHO on motorcycles has little or no effect.

All new car models will be fitted (DRL on cars and light vans has already come into effect since February 2011. By summer 2012 buses and large/heavy vehicles will also have to be so fitted with 'daytime running lights' (DRL), but these are actually Dedicated Running Lights – DRL – powered by diode type lights which although within the regulations effectively make the vehicle without headlights on even less visible in relative terms, the reason for this is that diode lights glare and obfuscate vision.

It appears that the European Commission is suggesting that the legislation on DRL for cars and vans etc will make motorcycles less visible, therefore AHO or rather Dedicated Running Lights, need to be made mandatory for motorcycles as well.

As we understand it, the purpose of DRL is so that vulnerable road users can see vehicles (not vice versa). But if this holds true, then one of the most important elements – pedestrians (and to a lesser degree, cyclists) – has been excluded, because the DRL legislation does not consider that car drivers (and if this proposal goes through), motorcyclists, will not have the onus to see pedestrians.

What seems to be implied is that there is a shift towards the more vulnerable being responsible to "see" the vehicle which moves liability away from the vehicle driver. In other words, the thrust of this legislation appears to be driven by cost (to insurers) rather than for reasons of safety, furthermore, even the Commission's own report has been unable to provide sufficient evidence that DRL will reduce fatalities (Elvik)<sup>7</sup>.

Therefore, we believe that Automatic Headlights On should be left to the industry to develop on a voluntary basis as per the recommendations of CARS21, specifically: *Well-designed voluntary agreements, particularly those that encourage changes in consumer behaviour, can in some cases deliver public interest objectives in a quick and effective way.* An alternative may be found through WP29 at the UNECE in Geneva which could consider a world wide solution for these technical regulations, which is implied in the Commission's proposal anyway.

### **ii. Whether the proposed vehicle categories are appropriate;**

There is no reason to include L4e within the categories as a sidecar is a separate technical unit and not a motorcycle (which is already covered within the proposals). We corresponded with the Commission on this issue and they accepted that a sidecar is not a vehicle, but a separate technical unit.<sup>8</sup> Thus this category should be excluded from the proposals. The French Zeus model is effectively a Tricycle and not an L4e category vehicle.

<sup>7</sup> [http://ec.europa.eu/transport/roadsafety/publications/doc/IR2\\_report3\\_ver\\_oct\\_2004.pdf](http://ec.europa.eu/transport/roadsafety/publications/doc/IR2_report3_ver_oct_2004.pdf)

<sup>8</sup> <http://www.righttoride.eu/?p=6682>

### **iii. Whether you foresee any unintended consequences of adopting this Regulation.**

We believe that the cost implications of these proposals will have a significant impact on production costs and these costs will inevitably be passed onto the consumer. We refer to the LAT report which was carried out on behalf of the Commission – and which the Commission has since appeared to ignore.

From page 16 of the LAT report: Social Impact and consequences to SMEs<sup>9</sup>

“In general, and by repeating conclusions from the 2004 report, each policy option that will be adopted by the Commission to formulate a new legislation, contributes uniquely to a "common purpose", which is the reduction of pollutant emissions from PTWs. All policies related to pollutant emission reduction are associated with "General Social Impacts", which can be described by the following "chain reaction":

Any regulation/implementation of a policy option most probably leads to an upward pressure on the PTWs' direct costs (i.e. purchase price) or associated costs (i.e. maintenance, periodically scheduled checks, etc.). This cost increase may cause a decline in new PTWs sales and especially in these categories that are popular to youngsters or low income consumers in general. Therefore, a stringent emissions policy may result to environmental benefits from new motorcycles, but on the other hand it may shift the market towards cheaper second-hand vehicles and/or increase in the lifetime of all vehicles, which may result even to an increase in pollution and congestion.

Furthermore, a stringent emission policy may lead small vehicle fleets to their extinction, introducing an economic burden to small companies and SMEs.

It is difficult to estimate in absolute terms what will be the effect of each policy on SMEs' employment and on the market structure. Most of the data available are empirical and originate from one source only (industrial associations) so it is not easy to draw solid conclusions.

However, it seems that the PTW market is much more volatile than the passenger cars one, as revealed by the current economic turmoil. The Q1/2009 sales of motorcycles dropped by 35% over Q1/2008 compared to 17% of passenger cars over the same periods. This may be due to a larger share of motorcycles used for recreation rather than basic transportation, compared to passenger cars. Recreation use is much more elastic to cost increases than transportation needs.

It is not known whether the reaction of the market to individual cost increases of motorcycles and mopeds, due to emission control measures, will be similar to what was observed during the turmoil. In any case, emission control

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<sup>9</sup> Study on possible new measures concerning motorcycle emissions Final Report – Revised Version Report No: 08.RE.0019.V4, Thessaloniki, September 2009

**iii. Whether you foresee any unintended consequences of adopting this Regulation.**

measures add relatively more to the motorcycle price than passenger cars, and this should be taken into account when developing the regulations”.

**iv. Other comments or information**

In the accompanying document to the consultation “Impact Assessment - The potential cost and benefits to the United Kingdom of the measures outlined in the proposal for a Regulation of the European Parliament and of the Council on the approval and market surveillance of two or three wheel vehicles and quadricycles - Version 2”, is set out in greater depth regarding simplifying and improving the type approval process.

This concerns the simplification to be achieved by repealing the current framework Directive, 2002/24/EC, its 13 associated technical Directives and their amendments, and replacing them with a new Regulation containing the type approval requirements, adopting harmonised international standards in their place.

The process for adopting harmonised international standards appears to use harmonised international standards adopted by the UNECE (United Nations Economic Commission for Europe) to ensure technical requirements are still met. A small number of delegated acts will be created containing technical measures not covered by UNECE Regulations. There are expected to be three delegated acts covering:

- Environmental and propulsion performance
- Functional safety
- Vehicle construction

There will also be one implementing measure covering the administrative procedures for type approval.

The Regulation gives the Commission powers to lay down detailed technical requirements through delegated acts to ensure a high level of functional safety.

We welcome that the Government is seeking the inclusion of an obligation on the Commission to fully evaluate the impact on industry and consumers for any future technical measures (under delegated acts) on new functional safety items and follow adequate scrutiny processes.

However the Regulation is due to enter into force from January 2013 with the process of drafting and adopting the implementing measures and delegated acts, the UK Government has stated that it is likely to leave insufficient time

#### **iv. Other comments or information**

for the Government or industry to be ready.

The UK Government has also stated that “we will press the Commission for adequate lead times”.

The adoption of a new Framework would still require regular amendments to be made to reflect technical progress.

We are generally in favour of the principle of simplification.

However, we have major concerns due to where the proposal sits at present within the legislative process. It is our understanding that the proposal is scheduled to be voted on before the regulations, delegated acts and the adoption of harmonised international standards, have been agreed on.

Therefore in our opinion, all these issues need to be formulated before any agreement or alignment within the Council of Ministers and before any vote within the EU parliament takes place regarding the Commission’s proposal and subsequent amendments put forward by the IMCO committee.

Failure to do so would create an impossible situation whereby the motorcycle industry, consumers and member state governments are not able to have a clear understanding of what the simplification of this regulation actually entails.

This seems to be a common sense approach as it seems absurd that a proposal for a regulation should be agreed upon without a clear understanding of the outcome.

Please return this form as soon as possible but no later than 28 October to:

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