27th of December 2005

Stakeholders consultation

Transport Policy White Paper Mid-Term Review

ACEM response

ACEM/Association des Constructeurs Européens de Motocycles G.E.I.E. was founded in 1994 and represents all major motorcycle manufacturers in the European Union (European or producing in Europe), as well as 12 motorcycle industry associations in the member states. Their products range from 50cc. mopeds to the biggest cruiser and touring bikes.

Powered Two-Wheelers (PTW's) are divided into different segments such as mopeds, scooters, super-sport, touring, commuter, custom, traditional and off-road bikes. This large range of products explains why we refer to them simply as Powered Two Wheelers.

The PTW sector[1] employs over 100,000 people and represents a turn-over of 10 bn EURO in EU, of which ACEM members are responsible for 90% of the total production and up to 95% of the total market in Europe. This represented over 1.8 million vehicles in 2004.

ACEM will answer the questions posed by the Commission via this document.

Overall comments

With the White Paper on Transport Policy, the Commission proposed an Action Plan aimed at bringing about substantial improvements in the quality and efficiency of transport in Europe. ACEM believes that the white paper has not only failed to recognize that personal mobility is a basic right which should be at the heart of the EU Common Transport Policy, but also underestimated the vital role played by road transport in modern economies, as 90% of people in the EU travel by road.

So far, all attempts to reduce road traffic by developing artificially alternative means of transport have failed. As evidenced by the statistical data available, promoting narrow

[1] EU 15

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concepts, such as "modal shift", "marginal cost pricing" or "decoupling" should now be considered as policy choices that have simply been proven wrong.

Therefore, ACEM believes that the focus should be on policy measures that are fully compatible with the real demand-oriented needs of European citizens and businesses. Action is needed to re-orient the EU Common Transport Policy within the framework of a more systematic approach, without favouring arbitrarily one or the other transport mode, whilst at the same time applying realistic and economically viable principles, such as:

- **Fair and equal competition** between and within transport modes,
- **Freedom of choice** by users/citizens and accordingly the respect of rights and choice of users to select the most appropriate transport mode for their mobility needs;
- **Transport efficiency** (encouraging the most suitable and effective mode of transport according to the circumstances) to be considered as highly important;
- **Integration**, in particular in urban areas, of **Powered Two-Wheelers** (PTW's) in transport policy.

It would be a mistake if urban transport policies focused only on public transport neglecting other valuable alternatives such as PTW's. ACEM observes that this is currently the case in the White Paper on Transport Policy. The European Parliament in its Resolution on the White Paper (2002) supported "*improved mobility for motorcyclists through institutional investment, subsidies and legislation reflecting this preference (…)*"

In summary, EU transport policy should focus on providing mobility and transport free choice for the individual journeys of citizens, instead of continuing the failed approach of attempting to socially engineer the citizen's transport choices towards the very narrow and personally constrained routes that are offered by non private powered modes.

ACEM believes that the on-going mid term review is finally the opportunity to **integrate PTW's** and recognize their role in modern society.

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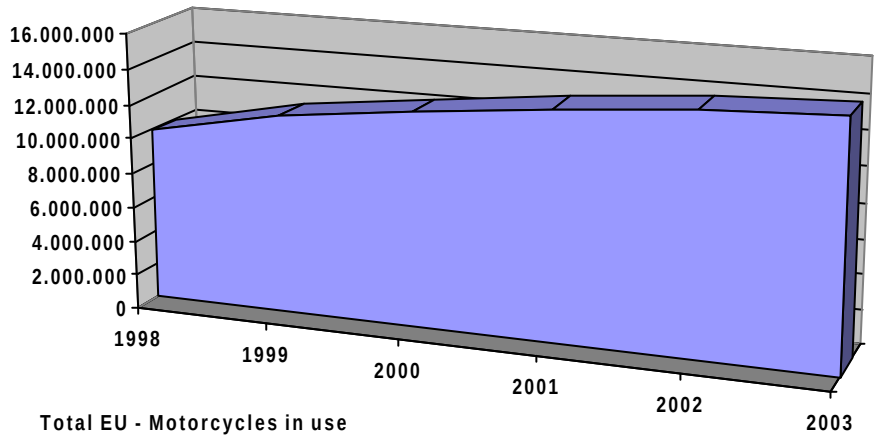
The White paper and PTW's

Since the need for mobility is normally satisfied by cars (without a coherent development of infrastructures), more mobility also means more traffic congestion. Every year transport congestion costs Europe 2% of its GDP. That is euro 200 billion per year or 440 euro per year per person.

Congestion affects mainly urban areas, and one of the White Paper's main aims is indeed to relieve congestion and also to reduce casualties. However the White Paper has overlooked the role that PTW's can play in urban environment.

The EU 15 totals more than 27 million Powered Two-Wheelers registered for road use, representing a very large variety of vehicles ranging from small 50cc town vehicles up to big motorcycles and cruisers of 1000cc and more. Looking specifically at motorcycles over the last 5 years, one sees a significant increase - +41% - of the motorcycle circulating parc. It seems clear that **people are turning to motorcycles to beat congestion**.



Source: ACEM – Yearbook 2005

For example in Belgium the circulating parc increased by more than 110% between 1990 and 2001. This development corresponds to an **increase of 194% in terms of kilometres travelled.**

When comparing the use of motorcycles with other modes of transport, the example from the United Kingdom shows that the **kilometres travelled with Powered Two Wheelers**

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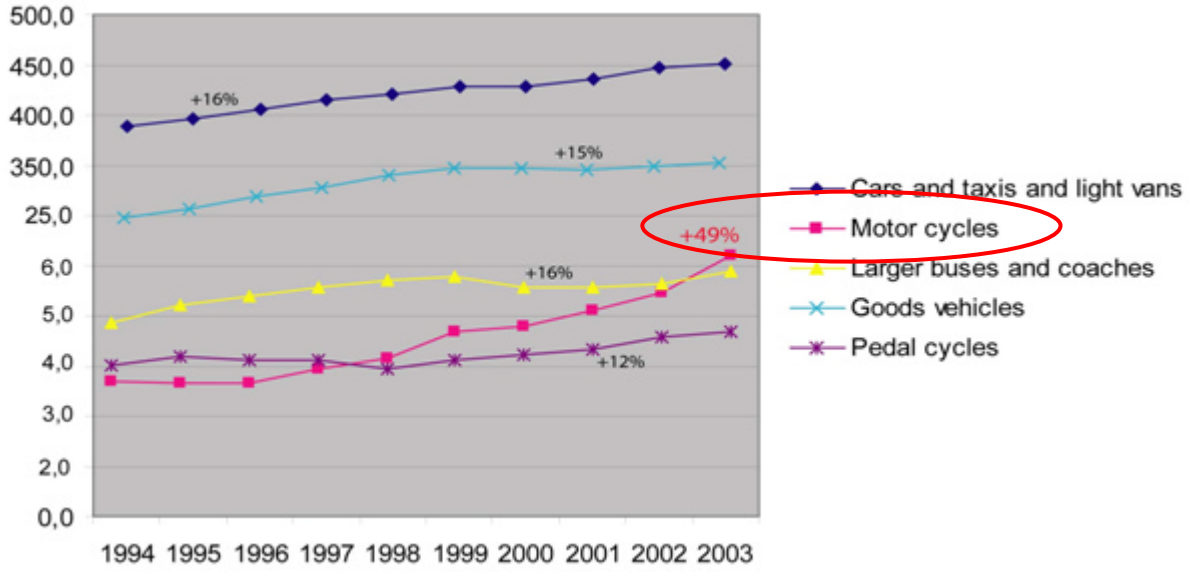
have increased by +49% over the last decade when other means of transport have increased only by 15%. Powered Two Wheelers play an increasing role in the transport mix.

UK Road Traffic: by type of vehicle



Source: UK Department for Transport

In recent years London has experienced a strong economy and growth. This is expected to continue and the forecast is for a net increase by 2016 of over 800,000 additional people and 600,000 new jobs. Against this background motorcycling has grown dramatically from about 62,000 motorcycles owned by Londoners in 1995 to over 100,000 today.

Looking at the most efficient transport modes

The current highways infrastructure in the proximity of many conurbations is increasingly unable to cope with the demands placed upon it by heavy and constant traffic flows, whilst on overstretched local roads maintenance budgets cannot keep up with the level of repairs needed.

The picture for public transport is very mixed. While in some countries highly developed networks exist, in others, public transport has been subject to decline. A number of rural areas are practically cut off from access to public transport. Many people who live in urban

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areas have to walk long distances before they can take advantage of a public transport system which many see as simply too inconvenient and sometimes expensive to use. This has led to an increased reliance on the car as a means of transport, leading to further declines in public transport and further traffic congestion.

The Powered Two-Wheeler offers a viable alternative to a reliance on the car and, as part of an integrated transport policy.

Social and economic value

Thanks to their permanent flexibility and availability, **Powered Two Wheelers provide social integration** by supplementing private and public transport, ensuring independence and mobility to all. The very wide offer made available by the manufacturers, allow a large variety of choice in terms of PTW's characteristics and budget. PTW's contribute to a widening of access to education and employment opportunities. They actually increase the time available for both work and leisure time which leads to a better quality of life. Furthermore, particular attention must be paid to the economic and social function that the smaller vehicles can play in society. Given their moderate costs (initial and maintenance), PTW's are affordable means of transport (some of them cost less than 1000 €) playing a social function and giving young generations and low income citizens more opportunities both from an educational and professional point of view.

PTW's play a vital role in modern economies. SME's, organizations and individuals active in urban areas place PTW's at the heart of their business. Courier companies, delivery of small goods, delivery of food, health care services etc, take advantage of the incomparable cost/efficiency ratio offered by PTW's.

PTW's represent an efficient and effective answer to the need for more mobility, both in case of Labour Mobility, as well as in case of Social Mobility with beneficial impacts, for instance on GDP. According to a study carried out in Milan[2], if 15% of the employees that usually go to work by bus and by car were to decide to go to work by PTW the GDP of the Lombardy capital could increase by 600 million euro (+0,5%GDP).

[2] Professor Beretta Zanoni (Partner, Ambrosetti – The European House - Professor of Business Economics and Strategic Management, Milan Bicocca University)

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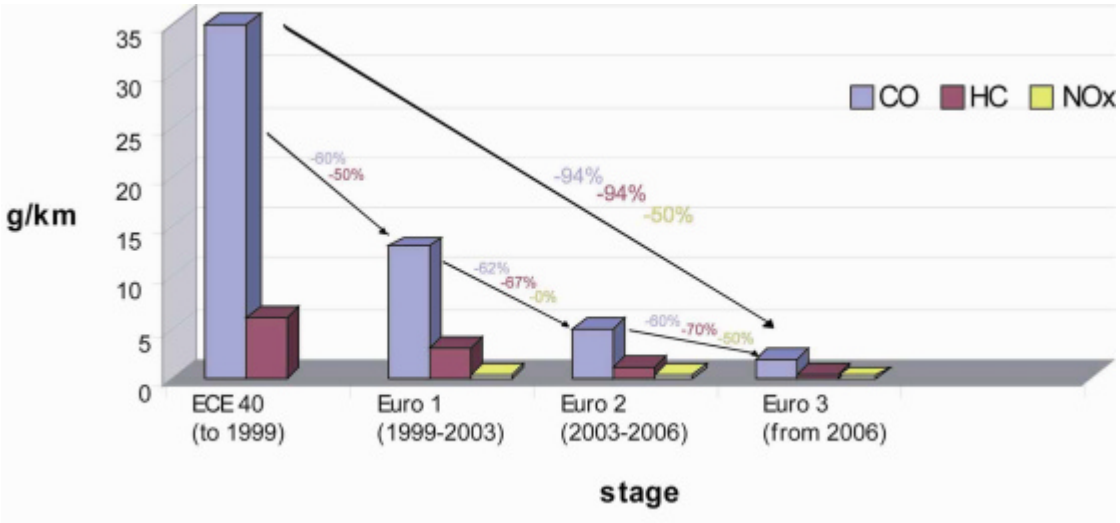
Environmental value

The motorcycle manufacturers have already achieved **enormous progress** in 7 years: a reduction of 94 % in carbon monoxide and hydrocarbon emissions, and a reduction of 50 % in nitrogen emissions. In addition, this drastic reduction in emissions has been achieved under more severe test conditions. In other words, the real percentage of reduction is much higher if calculated by the same test method.



In addition, PTW's have **major advantages** compared to any other motorised road transport mean with regards to **climate change**, with less emission of greenhouse gas, and on **fuel consumption**, with lower figures.

According to an independent expert chosen by the European Commission – the Laboratory of Applied Thermodynamics from the Aristotle University of Thessaloniky- **PTW exhaust emissions show a good, and very often better, trend** compared to the overall emissions of all road transport. This trend is not only valid as regards the three main pollutants, but also to CO2 and particles emissions. By 2012, the share of these two pollutants will be under 0,5% of the overall road transport CO2 and PM emissions.

In recognition of the growing number of European citizens using PTW's and their positive contribution to society, ACEM calls the European Institutions and the Member States of the EU to:

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- **Acknowledge the congestion relief potential of motorcycles and scooters** and efficiency in door-to-door journeys especially in congested urban areas or in rural areas due to the lack of other available means of transport (i.e. public transport).

- **Promote "improved mobility for PTW's users** through institutional investment, subsidies and legislation"[3] (i.e. Safe and secure parking spaces for PTW's at railway, subway and bus stations, schools and workplaces, expanded secure parking facilities for PTW's in town and city centres; PTW dedicated lanes and give PTW's access to bus lanes, high occupancy lanes and other reserved lanes; double stop lines at traffic lights with the advanced line reserved for PTW's; give low emission PTW's access to city centres closed to individual motorized traffic).

- **Encourage Member States through the adoption and exchange of best practices to exempt PTW's from congestion charges** that may be applied to motorised vehicles accessing city centres due to the role that PTW's can play in relieving congestion in urban areas and at the same time using less fuel hence reducing emissions.

- **Promote a better and a fairer road pricing for PTW's** that access toll roads according to the road surface used and to the services available to the PTW users. Indeed when devising and setting road taxes, the impact of PTWs on infrastructure must be taken into account, given that PTW's use less road surface and are lighter than other vehicles on the road, thus less causing less damage and deterioration; these facts are not currently acknowledged by authorities or toll road managements when calculating the price that a PTW must pay to use a toll road. Furthermore the services available on those roads are more aimed at cars and other heavy vehicles.

- **Encourage the Member states to give higher priority to fighting theft** of vehicles.

- **Promote fiscal incentives in favour of newer, more environmentally friendly PTW's** to accelerate the renewal of the old PTW fleet.

[3] European Parliament resolution on the White Paper on Transport Policy, 2003

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Road safety

The White Paper states "the highest casualties are among pedestrians, cyclists and motorcyclists". ". We must, however, emphasise that studies and researches[4] highlight that cars are the principal cause of road traffic deaths of pedestrians, cyclists and motorcyclists. Hence we call on the Commission to **support effective measures towards car drivers, such as PTW awareness campaigns**. Moreover we think that, in addition, all vulnerable road users should be made aware of the risks and of ways to reduce them through appropriate awareness campaigns.

London's example

This approach was followed in London as part of the Transport Strategy and Road Safety Plan adopted in 2000. One of the key objectives was to reduce the number of motorcycle crashes and casualties. Analysis of the data showed that many of the accidents involved cars and lorries crossing the path of the motorcyclist. Changing the behaviour of car drivers is as important as educating motorcyclists how to avoid crashes. Transport for London (TfL) has commissioned an innovative series of advertisements showing simulated crashes as a way of bringing drivers attention to the problem of "not seeing" the motorcyclist. The BikeSafe initiative funded by TfL involves motorcyclists going out for a voluntary ride accompanied by a qualified police rider who assesses the motorcyclist and advises on safe riding, highlighting any training needs. Over 5,000 motorcyclists have chosen to be assessed to date.

As a result of the safety measures introduced by TfL and the London boroughs together with initiatives from national government, the industry and others, the number of killed and seriously injured motorcyclists in London fell from 1286 in 2001 to 895 in 2004 representing a 30% reduction, despite a significant increase of the PTW circulating fleet. Progress is being made in other areas. There are currently experiments with motorcycles sharing some bus lanes and advanced stop lines that have been introduced for cyclists.

As highlighted by the London example, the **full integration of PTWs into every transport policy is necessary to reduce vulnerability and improve their safety**. Only an integrated

[4] See section **Accident Analysis & preventing motorcycle accidents** and MAIDS project (Motorcycle Accident In-Depth Study), which provides qualitative and representative data on accidents involving PTWs. The full report can be downloaded on the MAIDS web-site (http://maids.acembike.org). See also The ETSC report 2003 acknowledges (page 12-13) that "However, cars mainly cause the road traffic death of other car occupants, motorised two-wheelers, cyclists and pedestrians."

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system approach addressing all pillars of road safety –the driver, his vehicle and the infrastructure- can lead to significant and lasting results.

The support of the European Parliament

The European Parliament supports that *"Infrastructure in particular, must be thought and developed considering the needs of all road users including the more vulnerable ones, namely motorcyclists, cyclists and pedestrians. Roads should be upgraded to accommodate the current traffic levels. Even the most modern infrastructure must be built according to the limitations of the driver. Driver errors can be avoided and their consequences mitigated by means of a systematic inclusion of road safety issues at any stage of the design, construction and operation of roads"*[5].

The European Parliament says also that "*Roads should be built according to standards which take into account the needs of all road users, including the more vulnerable ones, such as motorcyclists, cyclists and pedestrians. We call on the Commission to promote best practices for road construction and maintenance and to encourage the use of motorcycle friendly crash barriers and promote the regular updating of CEN standards*"[6].

Accident Analysis & preventing motorcycle accidents

ACEM, with the support of the European Commission DG TREN and other partners, conducted an extensive in-depth study of more than 900 motorcycle and moped accidents during the period 1999-2003 in five sampling areas located in France, Germany, Netherlands, Spain and Italy. The data collected in the MAIDS[7] study represents currently the most comprehensive database of PTW accidents available today.

An important outcome of the MAIDS study was that in 50 % of all the MAIDS cases (61% of the multi-vehicles accident cases) the opposing vehicle driver was the primary cause of the accidents. In 70% of these cases (37 % of all accidents), the most frequent primary causation factor was a car driver's perception failure.

Another common primary contributing factor from MAIDS was a perception failure on the part of the PTW rider (12% of all cases). Additionally, MAIDS shows that in 32% of the PTW

[5] See European Parliament own initiative Report on Road Safety - 2005.
[6] See European Parliament own initiative Report on Road Safety - 2005.
[7] See MAIDS project (Motorcycle Accident In-Depth Study), which provides qualitative and representative data on accidents involving PTWs. The full report can be downloaded on the MAIDS web-site (http://maids.acembike.org).

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accidents (21% for the opposing vehicle), the collision avoidance manoeuvre failed due to inadequate time available to complete the collision avoidance action.

For the sake of timely perception, anticipation and collision avoiding behaviour of both the rider and the other vehicle driver, **Intelligent Transport Systems** (in particular Cooperative Rider Assistance Systems, **CORAS**) and motorcycle **enhanced front lighting**, (conspicuity) should be given high priority to address this important area of safety for motorcyclists.

Therefore ACEM calls the European Institutions and the Member States of the EU to reinforce and add the following actions

Reinforcement of actions:

- **Adopt a more realistic, balanced and comprehensive approach to road safety** taking into account the needs of all users.
- **Adopt the long awaited directive** aimed at the harmonisation of the criteria for identifying "black spots", and the means of making their presence known to users. To this end, the Commission should promote the adoption of harmonised Community signs and motorist information taking into account the need of all vulnerable road users.
- **Provide adequate funding** for extending in new Member States further in-depth accident investigation for PTW's following OECD methodology.

New actions:

- **Upgrade, maintain, develop and install road infrastructure and furniture with PTW's in mind**.
- **Design, promote and run awareness campaigns** targeting car drivers and PTW users;
- **Up-date regularly the CEN standards on road infrastructure** taking into account the needs of vulnerable road users such as PTW users.
- **Support research activities** dedicated to PTW safety within FP7.

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- **Support policies and research in the area of preventive safety and motorcycle eSafety.** They allow the other vehicle driver to see the motorcyclist better and earlier and allow more time for emergency manoeuvres to avoid a crash. Particular technologies providing such benefits are enhanced motorcycle front lighting (motorcycle conspicuity) and Cooperative Rider Assistance Systems (CORAS) that communicate with car integrated vehicle safety systems and intelligent infrastructures.

ACEM call upon the Commission, also in the light of the Mid-term review of the 3rd Road Safety Action Programme, to take a balanced approach recognising the specific attributes of PTWs.

Conclusion: PTW's integration in transport policy

PTW's as an affordable alternative to cars, offer the necessary freedom of choice among individual and public transport modes by ensuring independence and mobility to all. They constitute a positive response to the evolution of the constant increase in mobility needs observed throughout Europe.

As major progress has been achieved in a short period of time, the environmental impact of PTW's is and will be further minimised thanks to a drastic reduction in emissions. Independent experts confirmed that the PTW contribution to the overall transport pollution is very low and will continue to decrease during the decade.

Despite the attributes and growth observed during the last years, Powered Two Wheelers are still not properly considered by the institutions. The White Paper confirms this.

PTW's have a role to play in the transport needs of modern society. The challenge for policy makers is to promote them through appropriate strategies. This includes the necessary acceptance by public authorities at all levels that positive PTW policies not only assists PTW accessibility, but also can help to reduce rider vulnerability to accidents and injury.

This will result in increased and safer personal mobility, with all the advantages this affords to the quality of life from both a social and economic viewpoint, without the, otherwise inevitable, unsustainable increase in urban pollution and congestion.

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