

Position Statement

European Road Safety Observatory publication on Powered Two Wheelers

FEMA position statement

On August 1st, 2008, the European Road Safety Observatory (ERSO) published its last report, under the title "Powered Two Wheelers"¹. The ERSO, part of the SafetyNet project funded by the European Commission, offers access to road safety knowledge and data for professionals.

FEMA expresses its concerns over the contents of this report for several reasons:

- **FEMA has not been consulted by ERSO or its members** at any stage of the production of the report,
- **Relevant existing research and data related to motorcycle safety do not seem to have been taken into account** in the report,
- The content and conclusions of the report show what FEMA perceives as a **bias towards motorcyclists, with a certain number of approximations or subjective statements** not based on evidence.

As the main representative of motorcycle users in Europe, FEMA is willing to provide its expertise and knowledge to all road safety stakeholders. **FEMA is therefore concerned that a major road safety initiative like the ERSO would overlook its input**, and emits serious reservations about the results of the report.

FEMA calls for the Directorate General Energy & Transport of the European Commission to make sure that it should be consulted during future research and knowledge-building projects.

ERSO: objectives and input

The ERSO website was set up by the SafetyNet project, in order to build a primary focus for road safety data and knowledge, as specified in the Road Safety Action Plan 2003. The observatory supports "all aspects of road and vehicle safety policy development at European and national levels". It makes proposals for common European approaches in several areas including exposure data, safety performance indicators, and develops new in-depth accident causation databases and statistical methods to analyse accident data.

The SafetyNet project was completed in January 2009. The last document included in

¹ http://www.erso.eu/knowledge/Fixed/45_PoweredTwoWheelers/powered%20two%20wheelers.pdf

ERSO was a report on the safety Powered Two Wheelers (PTWs). The 44-page long document covers the issues of PTW use, PTW safety, accident characteristics and injury mechanisms, contributory factors in accidents, accident prevention and injury protection, licensing requirements, violations by PTW riders, and road design.

In this context, it should be pointed out that:

- FEMA has already produced a comprehensive report on motorcycle safety: the European Agenda for Motorcycle Safety² (EAMS)
- The OECD has produced a key report on motorcycle safety³, identifying the problems of motorcycle safety and discussing practical solutions

Therefore, FEMA regrets that ERSO members did not seek to use these readily available sources of information. FEMA was not consulted and is not referenced as a source, despite its unique position as the only representative PTW user organization at European level.

Content and statements

The ERSO website, on the subject of its documents, states that *"The information is scientifically founded, easy to read and ready to use. For each subject the information consists of an overview of the magnitude of the problem, prevalence and countermeasures."*

However, FEMA has noticed along the document certain statements, approaches and conclusions that are not consistent with the ERSO's objectives of unbiased, fair and evidence-based research.

- *«Riding a PTW gives a special sensation which is attractive to some groups of riders.» (p.2)*
 - ➔ People from all over Europe use PTWs for a wide variety of reasons based on practical, economic and personal choices. Rider sociology cannot be reduced to a single and unspecified reason.
- *« Safety, or rather the lack of safety of PTW's is first of all expressed in numbers of accidents and casualties » (p. 9)*
 - ➔ FEMA is concerned that the report places a general and absolute judgment on all PTWs and all riders, contrary to the purpose of statistical analysis.
- *« At first sight the engine power seems to be the most important of all PTW properties in relation to safety. There are several studies on this subject with mixed results. The idea is that a heavy and powerful PTW is difficult to control even at low speeds and may invite riders to test the potential acceleration and/or top speed, which brings them in situations which are difficult to control. » (p. 27)*
- *« The accident rate (corrected for estimated kilometres) shows a strong relation*

² <http://www.fema.ridersrights.org/docs/EAMS2007.pdf>

³ <http://www.internationaltransportforum.org/jtrc/safety/Lillehammer2008/Lillehammer08FinalReport.pdf>

with power to weight ratio, with four times higher rates for the most powerful motorcycles compared to the least powerful. (...) After correction for age of the rider and traffic conditions, the fatality rate for the 50cc PTW was lowest and highest for PTW's with engines of more than 250cc, with the fatality rate for 125cc in between (GB study 1984-1988)» (p. 28)

- *« Mopeds with their small engine and restricted top speed can be expected to have a lower accident rate than motorcycles. But this is not evident from the actual figures. They have accidents with less severe injuries than motorcycles, which results in lower fatality rates. » (p. 29)*
 - ➔ The report seems to start from the assumption that more powerful engines mean higher accident rates. Numerous studies have investigated the link between engine power and accident rates but so far nothing proves the existence of a link between these two elements. The 1997 TNO study⁴ clearly identified that **“there is no scientific evidence that engine size is a major factor in motorcycle accidents; engine size does not emerge as a separate risk factor”**. However, in-depth studies have shown the existence of a link between a higher accident rate and ownership of certain types of motorcycles with an “aggressive” image relayed by marketing and media – without relation to engine size, which can be as low as 125cm².
- *« Research studies show that the use of daytime running lights by cars has no adverse effect on the benefits of headlight use by PTWs in most situations. » (p.37)*
 - ➔ FEMA published a position paper on the subject⁵ in response to a consultation from the European Commission. It quotes research that shows that the use of daytime running lights leads to lower visibility and conspicuity for motorcyclists and other vulnerable road users. This evidence seems to have been overlooked by the ERSO.
- *« A license system needs enforcement to prevent the use of PTW's by unlicensed riders. Haworth & Smith [20] found a group of Australian riders without valid license with a relatively high accident rate. Other subjects that may need enforcement are speed limits, drinking, tampering of the engine and helmet wearing. » (p. 39)*
 - ➔ FEMA is of the opinion that these observations have little value unless significant differences are shown when the figures are compared to the figures for car users.
- *« (...)Such a system of graduated licensing is expected to reduce the number of motorcycle accidents because (...) Some potential riders are discouraged to obtain a motorcycle license » (p. 34)*
 - ➔ FEMA is extremely worried that a serious publication would advocate legal and administrative measures aimed at deterring citizens from adopting the mode of

⁴ Motorcycle power 74kW study Phase B Report prepared by TNO for European Commission DG 11, Industry. Report No.97.OR.VD.056.1//PR

⁵ http://www.fema.ridersrights.org/docs/positionpaper_drl_consultation_nov2006.pdf

transportation of their choice. Licensing systems are in place to ensure satisfactory rider and driver training, not to adjust the number of vehicles on the road.

FEMA believes that this course will have negative effects on road safety, and instead supports an approach to PTW safety based on driver and rider training, increased driver awareness, and the development of rider-friendly infrastructure.

Conclusion

With the scheduled closure of the SafetyNet programme early this year, the entire ERSO website is to be transferred to the website of the DG Energy & Transport of the European Commission. All its contents, data and knowledge will be made available to professionals, researchers and policy makers interested in the issues of road safety.

FEMA believes that, for the reasons stated above, the report contains an unsatisfactory number of inaccuracies and generalizations. The writers start addressing most points with a stereotypical statement about motorcyclists, presented as irresponsible and dangerous risk-takers, and then proceed to either confirm or debunk that view. FEMA does not believe that this approach is efficient when applied to the field of research, especially when the results are supposed to be publicized in a comprehensive road safety database.

In addition, the publication of the PTW report as the last addition to the ERSO data leads FEMA to think the topic of PTWs was considered less important than others in the prioritization of the work.

The recognition of the work of the ERSO as part of the European Commission's knowledge database underlines its importance. Its data will be regarded as a key reference in future research, debate and road safety policies. As such, FEMA is worried that some controversial elements in the PTW report will be taken for granted by future policy-makers, overlooking more comprehensive research. FEMA renews its call for the use of fair and evidence-based PTW research.

Therefore, FEMA recommends that the European Commission seeks its input for upcoming research and knowledge-building projects regarding motorcyclist behaviour and safety. This will ensure that the point of view of European PTWs users is represented and taken into account when building the tools for tomorrow's policies and research.



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.
