

# THE NATIONAL MOTORCYCLE COUNCIL

## Proposals on changes to light transmission limits for visors

### **SAFETY BENEFITS**

The NMC considers that there will be net benefits and risk improvement to safer rider behaviour by legalising visors with a light transmittance of 18% for daytime use only.

Riders will be protected from the effects of sun glare but to be effective, a nominal light transmittance of 25% is necessary. Hence the NMC is unwilling to accept anything greater. A rider who is not suffering glare discomfort is more inclined to look longer and more carefully for potential hazards than one that is dazzled. This is perhaps difficult to express in scientific terms. In layman's terms however, it is the difference between taking a quick squint into bright sunlight and thereafter taking a chance on perceived hazards, compared to taking a longer and more careful look with the benefit of a dark visor.

Riders at present are using tinted visors not approved to a recognised standard and hence are of unknown quality in which impact resistance, optical qualities and colour filtering - which could adversely affect signal recognition etc, could be compromised.

Regulation to BSI with markings to indicate that a visor is approved to that standard would significantly reduce sale of these unapproved visors within the market place. This would be beneficial not only initially to the motorcycle accessory trade with increased sales but also to UK industry since manufacturers/distributors are currently restrained from marketing visors which do not comply with BS 4110 or UN ECE 22.05. These visors would satisfy demand in place of unapproved visor imports obtained through non-UK based sources or the Internet.

With visors indelibly marked with the appropriate standard and "DAYTIME USE ONLY" for those with less than 50% light transmittance, enforcement of both approved visors and tinted visors used within official lighting up times can then be readily achieved without the need for enforcement agencies to purchase equipment that measures light transmittance.

Visors with a minimum light transmittance of 80% will be mandated for nighttime use, compared with the current minimum of 50%, thus improving rider safety.

### **SAFETY RISK EVALUATION**

There are some concerns that riders would be caught out in bad weather conditions of failing light and be tempted to ride with a dark visor in these conditions or at night. Unlike unapproved dark sunglasses, a visor can readily

be "flipped" open if these circumstances are encountered. Alternatively, a "clear" replacement visor, if carried by the rider, can easily be fitted at the side of the road.

Motorcycles and scooters have various methods of storage, lockable space underneath seats or tail sections, top boxes soft luggage including panniers, tail packs and tank bags. In addition, purposely-designed visor pouches, similar to a "bum bag", are readily available.

Many helmets are fitted with quick release mechanisms. Other release mechanisms do not require sophisticated tools, for example, a few twists of a coin may be all that is required to replace a visor.

Another worry would be that of a rider "caught out" at night or in conditions of failing light without a clear visor. Riders are already well educated and aware of the dangers of the usage of unregulated dark visors and the advantage of carrying a spare clear visor. The members of the National Motorcycle Council will positively support additional educated campaigns on the subject (see member action pledges below).

### **ENFORCING THE CHANGE**

Enforcement by a non-endorsable fixed penalty ticket using the guidelines of official lighting up times would clarify any changes in legislation for police forces in the UK. Firstly, if a rider is wearing a non-regulated visor, secondly if a rider is wearing a regulated tinted visor within the official lighting up times and thirdly advice and warning would be given if a rider is using a non-regulated or regulated tinted visor during conditions of poor light.

### **SAFETY AWARENESS**

Suggestions that a change in the law will worsen motorcycle safety records are of a major concern.

As part of a legislative framework there would be a greater likelihood of riders complying by wearing approved visors and tinted visors during periods between lighting up times than in the current situation when visors with a deeper tint than 50% light transmittance are not legally available.

With a tint of 18%, the sheer practicalities of using such a visor at night would discourage riders from using them after lighting up time.

Without accurate data it is unknown how many motorcycle Road Traffic Collisions (RTCs) are attributed to the wearing of a dark visor at night or in conditions of poor light.

While the current legislation remains in force a concerted safety, education and awareness programme cannot be promoted to uneducated riders presently using dark visors at night or in conditions of poor light. Therefore legislation

accompanied by education and set guidelines, backed up by enforcement, could be an attributable factor in improving motorcycle safety.

## **PROMOTION – EDUCATION - AWARENESS - GUIDELINES**

A full education and safety awareness campaign publicising guidelines for tinted visor usage could be initiated jointly between the Department for Transport, Police forces, Manufacturers represented by the MCIA, Retailers represented by MRA, road safety officers represented by LARSOA, Training Schools represented by the MRTA and BMF Rider Training Scheme, Motorcycle Press and Riders' Groups, MAG and BMF. As part of this campaign the NMC recommend that a tinted visor awareness leaflet be produced through liaison within the Advisory Group on Motorcycling.

The Motorcycle Retailers Association (MRA), British Motorcyclists Federation (BMF), Motorcycle Action Group (MAG) Motor Cycle Industry (MCI) are represented on the British Standards Institute (BSI) Sub-Group PH/2/5. They would use their influence to include in the standard a requirement to mark tinted visors "Daytime Use Only". Instructions for use should also be printed on packaging, with particular reference to when it is appropriate and inappropriate to use them, care to prevent scratching, misting, etc. BSI may also wish to endorse or even join the publicity campaign when the revised standard is launched.

## **ACTION PLEDGES BY NMC MEMBERS AND INTERESTED PARTIES**

### **Enforcement Agencies**

- Police forces that operate the "BikeSafe" awareness scheme would have a role to play in the education of riders.
- Enforcement agencies would ensure that their officers have up-to-date information to give in response to enquiries from the public.
- Trading Standards Officers can continue to ensure that only visors subject to recognised standards are marketed.

### **Manufacturers**

MCI would explore with the NMC the possibility of producing a leaflet explaining the legislation regarding dark visors. If manufacturers and dealers agree, this could be included with each visor and possibly each helmet sold, even if not supplied with a dark visor at point of sale. However, manufacturers would wish to explore the possibility of DfT joint badging for such a leaflet, with production costs shared between Government and NMC member groups.

- MCI would explore the possibility of the addition of a removable sticker on each dark visor explaining its legal usage.
- MCI feels that an awareness campaign by Government via the trade press, or VED renewal mailings is another means of increasing

awareness by end users. MCI would raise awareness in the trade and general motorcycle media with an appropriate press release campaign.

### **Point of Sale**

- Retailers, dealers and accessory mail order firms would point out the requirements of using a dark visor by leaflets, posters, etc.
- Retailers would usefully advertise the campaign in-store at the point of sale.

### **Motorcycle Press**

- A high profile campaign through advertising and editorial comment in the motorcycle press could be undertaken.
- Product evaluations on portage options and simple competitions with carry pouches as prizes could be published.

### **Riders Groups - British Motorcyclists Federation**

- BMF would publish prominent features in its house magazine *Motorcycle Rider* to inform members of tinted visor issues with particular emphasis on, "You've been accorded a privilege; don't abuse it."
- Feature the issue in the BMF Website, *Riderspace* for members and visitors to the site.
- Use the BMF publicity machine to issue press releases aimed at producing stories in the motorcycle press which promote the above message.
- Raise awareness about responsible tinted visor use would be promoted at BMF Shows and other motorcycle shows where the BMF has stands.
- The BMF has two set piece campaigns each year. A new tactic for 2003 has been adopted that keeps one campaign open but sets aside funding for a second. Raising awareness about dark visors could be the campaign that fills the bill.
- Assist BSI to implement a publicity campaign on usage of tinted visors should a revised standard be issued.

### **Riders Groups - Motorcycle Action Group**

- MAG would highlight the safety issues surrounding tinted visors in the members magazine *Streetbiker*, also in *Network*, the activists newsletter thereby informing and encouraging members and affiliated clubs who are promoting the awareness campaign.
- Raise the awareness through the Internet including MAG websites and electronic mailing systems to the motorcycle and mainstream press.
- Promote awareness at MAG Shows and MAG stands at major exhibitions.
- Include the issue and raise awareness through inclusions in ongoing campaigns and promotional literature.
- Assist BSI to implement a publicity campaign on usage of tinted visors should a revised standard be issued.

### **MRA and MRTA**

- Provide support for a Government awareness campaign, for example give feedback on design or content of literature, also assistance with distribution to retail and rider training members, etc.
- Participate in an integrated campaign alongside other NMC members to ensure consistency and effective delivery of message to target audiences
- Use (MRA) representation in the BSI Sub-Group PH/2/5 to include in the standard a requirement to mark tinted visors "Daytime Use Only" and include instructions for use with particular reference to when it is appropriate and inappropriate to use them, care to prevent scratching, misting, etc in the packaging
- Assist BSI to implement a publicity campaign on usage of tinted visors should a revised standard be issued
- Include prominent features in own member publications to inform members of visor issues and any legislative changes
- Use the RMI Press Office to issue press releases to promote awareness to the necessary audiences in a variety of media particularly the trade press
- Encourage MRA members (and the wider retail trade) to display and promote point of sale awareness information
- Encourage MRTA members and the wider training community to promote appropriate information and advice regarding visor usage to training customers including new riders

### **LARSOA**

- Provide endorsement and support for a Government led awareness campaign.
- Participate in an integrated campaign alongside other NMC members to ensure consistency and effective delivery of message to target audiences
- Include features in own member publications to inform members of visor issues and any legislative changes.
- To include relevant features on the LARSOA website.
- Encourage LARSOA members to promote and distribute awareness information.

### **Despatch Association**

- Provide support and endorsement for a Government awareness campaign.
- Participate in an integrated campaign alongside other NMC members to ensure consistency and effective delivery of the message to target audiences.
- Include features in own member publications to inform of visor issues and any legislative changes.
- Encourage DA members to promote and distribute awareness information via its Association Magazine.

### **Motoring organisations**

- Feature information and a summary of legislation changes regarding tinted visors on their websites.
- Include information on visor issues, where suitable, in their in-house and member magazines.

### **GUIDELINES**

Guidelines could be formulated through the AGM's sub group on Vehicle Security and Safety Taskforce.

### **TIMESCALES**

To maximise publicity to all interested parties The International Motor Cycle & Scooter Show at the NEC Birmingham starts on the 14th November and would be seen as an ideal launch vehicle for an announcement to the change in the usage of dark visors given the high profile the show enjoys with the motorcycling public, press and mainstream media.

### **SUMMARY**

Members of the NMC, representing the wider motorcycle community, recognise both the risks and benefits associated with a possible change to visor regulations. In addressing the risks, the community believes that an integrated awareness campaign and other associated activities would minimise the likelihood of illegal use of dark visors at night to an acceptable degree. Equally, the safety benefits for riders in having adequate protection against sun glare (and visor quality) are extremely important. Given that any regulation change will also allow the opportunity to reduce the allowable level of tint for nighttime use (from 50% to 80% transmittance), the NMC strongly supports the case for permitting visors with an 18% light transmittance for daytime use only.