

## Further information

**Related to question 3 (Step 6)** - In the matter of the implementation of 3DLD the motorcycle industry calls on DSA to adopt the progressive training option as an opportunity to improve long term rider safety with embedded progressive training processes, delivered to a common standard, quality controlled and wisely governed.

However industry recognises recent events, not least the implementation of 2DLD and the current economic circumstances, must be considered.

These events cause the motorcycle training providers, as the delivery agents to be:

- Sceptical about DSA's ability to introduce such a progressive training scheme, and
- Concerned for their commercial viability if such a scheme were introduced at DSA's indicative cost levels.

It is therefore with regret, and irrespective of the improved rider safety benefits available, that the training industry must reluctantly favour the 3DLD testing route in the short term as the only option available that provides a known, if less than perfect, stable environment that may offer a semblance of commercial survival for trainers, without barring access to motorcycling as a transport mode due to excessive cost of entry.

Industry calls for a standard to be introduced over time to ensure that all riders taking training prior to test presentation are trained to an equivalent level thus building the foundation of a national rider standard.

Industry will in the medium term, continue to press for the progressive training option recognising the opportunity to improve long term rider safety with embedded progressive training processes, delivered to a common standard, quality controlled and wisely governed, and would not want to see this option excluded from legislation merely because it must act in the face of a short term expedient position.

**Related to question 6 (Steps 8/9)** - Industry also strongly rejects the idea of familiarisation training for progressive access. This amounts to 'gold plating of the directive as it requires mandatory training AND testing, when only one of these is required to comply with EU regulations. The idea of allowing progressive access riders who have taken this familiarisation training on the roads unaccompanied whilst using L plates on unlimited machines will not improve rider safety in the long term and will encourage perpetual learners on A2 and A category machines. We strongly urge the DSA to reconsider this proposal.

# Consultation Paper: Implementing the New European Union Requirements (3DLD)

## MCITA Guidance Notes

These guidance notes are formed from the opinion of the MCITA Committee members, all of whom understand the day to day issues faced by ATB's and the novice riders that they train. It is not our intention to tell you how to reply, but to give you the views of our Committee to consider, alongside your own knowledge and expertise. If you do not agree with our views these Guidelines still contain useful information on completing the Consultation online.



## The Consultation Paper

Within the consultation there are 7 **motorcycle related** questions:

- Question 1 relates to moped licensing
- Question 2 relates to moped riders with a physical disability
- Questions 3 - 5 relate to a training upgrade and the progressive access route
- Question 6 relates to provisional licensing
- Question 7 relates to motorcycle riders with a physical disability

There are 12 specific questions in this consultation, followed by a number of questions asking for general comments and about the impact assessments. If you only have an interest in the motorcycle specific elements of this consultation, you only need answer the first 7 questions.

### Deadlines:

- Your views must be received by DSA by 5th February 2010.

### Response Method:

- Electronically** - On-line (the DSA's preferred option) at [www.dft.gov.uk/consultations/open/thirddirective](http://www.dft.gov.uk/consultations/open/thirddirective) (see diagram to left)
- Post** - you can download an answer form from the web and post this to the *Christopher Curzon, Zone 2/09, Department for Transport, Great Minster House, 76 Marsham Street, London, SW1P 4DR*

## Completing the On-line Consultation Response (recommended method)

Below you can find step by step instructions for electronic completion and also the course of action recommended by the MCITA. The MCITA response follows extensive examination of the Consultation Paper and represents the collective views of the MCITA Committee (see MCITA website/About Us for Committee details).

**1. Introduction**  
The introduction provides you with information concerning

- Where to find the Consultation Paper
- How to navigate the site
- Where to get help (you can also contact MCITA)

Click NEXT to continue.

We hope that you have found this document useful but if we can provide further assistance please do not hesitate to contact us: email [enquiries@mcita.co.uk](mailto:enquiries@mcita.co.uk), or telephone 02476 408032  
To find out more about the MCITA - visit [www.mcita.co.uk](http://www.mcita.co.uk)

**STEP 2. Your Details**  
Please complete all the details as instructed. The system will not allow you to move on without registering the compulsory information on this page.  
**Note: anonymous answers will not be counted. You can opt for your response to remain confidential should you wish.**

**STEP 3. Confidentiality & Freedom of Information**  
Read the information and tick the box indicated if you do not wish your reply to be made publically available.

**STEP 4. Moped Licensing (Question 1)**  
**Suggested response: Totally Disagree**  
**Suggested comments:** This would give 16 year olds access to small trikes and light quads for the first time. Any accidents would be counted as motorcycle accidents. Currently these machines can not be ridden in the UK due to our licensing regimes. There is a fear from the ATV industry that the only machines which would be suitable for this category are of a lower quality. These vehicles are unstable and have no rear wheel steer or differential.

**STEP 5. Moped Riders with physical disability (Question 2)**  
**Suggested response: Totally Agree**  
**Suggested comments:** The Committee have no issue with these proposals.

**STEP 6. Training Route (Question 3)**  
**Suggested response: Totally Disagree**  
**Suggested Comments:** The MCITA position on this is provided on the back page of this brochure in its entirety. If you agree with us, please paste this in to the comments box on the consultation response form. We have put this text on our website and can be found at: <http://www.mcita.co.uk/CmsPages/3DLD.1037798.2133991.cms>  
It is vital that the DSA/DfT are aware of our request that when legal changes are made, the option to include a training upgrade at a later date remains available.

**STEP 7. Agreement with DSA Training Proposals (Question 4)**  
**Suggested response: Totally Disagree**  
**Suggested comments:** The DSA proposals are extremely expensive and many trainers feel that this has been created to ensure that testing is the favoured option.

**STEP 8. Familiarisation Training (Question 5)**  
**Suggested response: Totally Disagree**  
**Suggested comments:** This is gold plating and is not required under the Directive. There is a call for mandatory training or testing, not both! When the UK abstained from the vote about 3DLD, they assured us that it would be implemented with the lightest touch possible. This is certainly going against that position.

**STEP 9. Provisional Licensing (Question 6)**  
**Suggested response: Totally Disagree**  
**Suggested comments:** The consultation proposes that riders will have access to category A2 and A motorcycles on a provisional licence basis, riding unaccompanied on L plates. The Committee and the vast majority of motorcycle stakeholders feel that this could have a detrimental impact on motorcycle safety and could create perpetual learners on larger bikes. We are urging our members to vote against this.

**STEP 10. Disabled Motorcycle Provisions (Question 7)**  
**Suggested response: Totally Agree**  
**Suggested comments:** We have no issues with this.

The remaining questions on the consultation are not motorcycle specific. We advise that you continue through without selecting any answers, unless of course you have an interest in these areas. We have asked external stakeholders not to comment on the motorcycle related questions without a clear understanding of the impacts.

If, like us, you feel that this consultation is confusing to read, there is a place to note these concerns in the general comments section.

**When you have finished, click SUBMIT to send your response to the DSA. It may be helpful for you to print off a copy of your response for your own records.**

**If you have any suggestions, queries or need help, please contact:**  
**The DfT:** email [3rdDirectiveConsultation@dft.gsi.gov.uk](mailto:3rdDirectiveConsultation@dft.gsi.gov.uk), or call **0207 944 6650**  
**The MCITA:** email [enquiries@mcita.co.uk](mailto:enquiries@mcita.co.uk), or call **02476 408032**