

A Fresh Approach to The Motorcycle Licence

Creating a training and testing regime fit for the 21st Century

National
Motorcyclists
Council



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National **M**otorcyclists **C**ouncil

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A Need for Change

The core purpose of motorcycle testing and training for novice riders is to improve safety. Successive licensing regimes from the 1980s to 2000s did exactly that, but since 2013 progress has slowed on safety and, in the case of motorcycle deaths, these have started to rise again.

Between 2009 and 2013, the testing and training regime saw significant changes as the European Driving Licence Directive evolved to change requirements for licence categories and the test itself. Complex and bureaucratic stepped licensing requirements were introduced, including multiple repeats of the same test. Since then, there is clear evidence that the planned gains in motorcycle safety have not materialised.

This paper outlines a series of proposals which draw on previous good practice and on what has been learned from the third Driving Licence Directive in terms of what does and doesn't work.

The NMC's position on licensing is based on the following principle: To make the licensing regime easier to understand and access, while maintaining appropriate road safety standards in training. The NMC does not propose a dilution of standards, but it does propose the creation of a system which is simpler to understand and access, with less cost, bureaucracy and repetition, while maintaining the UK's high training standards.

The Government is urged to start the process of reform and Ministers are called upon to empower this work through the DVSA/DfT Strategic Motorcycle Group, so that progress can be made and a new regime introduced which can deliver improved safety for motorcyclists - among the most vulnerable of road user groups.

This position updates the NMC licensing position which was first published in 2022. It takes account of developments in the issue and work across the motorcycling sector since then. Several aspects of this position are commonly held with the industry and it is designed to be read alongside the MCIA's 'Licence to Net Zero'.



Summary of Proposals

Conduct a full scale review of the motorcycle and other L-Category licensing regime.

What's Needed:-

1. Finally implement the changes to the Compulsory Basic Training (CBT) syllabus that the Government announced in 2017 and require theory and hazard perception testing for novice riders prior to taking CBT.
2. Digitise the administration of the CBT system to reduce the current burden of manual administration.
3. Enhance the CBT. The first CBT to remain valid for two years. After two years, users should take a new 'CBT Plus', also valid for two years, to improve their road and riding skills rather than just maintain their current level. After 2 years, riders on CBT Plus to take a final assessment carried out at their Approved Motorcycle Training Body (ATB) to gain a full licence for the Moped or A1 categories or, in the case of those riding A1 on CBT who want to progress to larger bikes, take a DVSA Examiner test to gain a 'Restricted A' licence - see below.
4. Licence upgrades from Moped to A1 machines to be carried out by a DVSA certified motorcycle instructor. The instructor must be working within an ATB and will undertake additional training to become a DVSA certified assessor. Under the current system a rider might take the identical DVSA Examiner test 3 times, which represents a barrier rather than an educational step. This will ensure additional training to help improve riding standards.
5. Combine the current 2 test modules (Module 1 and Module 2) into a single test event, reducing the complexity, expense and bureaucracy inherent in the current system.
6. Remove the A2 licence category which is not recognised under the Vienna Convention. A DVSA Examiner test on the progressive route will grant access to an 'A-Restricted' licence - available from age 18 - allowing access to 35kw machines. The restriction can be lifted once a compulsory ATB-delivered assessment is completed – which will be available from two years after the test is passed.
7. Allow younger moped riders access to A1 machines once an ATB assessment has been passed. This provides an incentive for 16 year old moped riders to get trained and be assessed.
8. Return the minimum age for Direct Access to age 21.
9. Redefine the Minimum Test Vehicle specifications for electric motorcycles in each licence category. The current criteria do not recognise that electric motorcycles deliver power differently and it is not currently possible to obtain a full 'A' licence using an electric powered machine.
10. Incentivise access to post-test training. Once a rider gains a full licence in any category, he or she should be encouraged to continue skills improvement via post-test rider training. This needs to be properly incentivised, so it becomes normal for riders to undertake additional training after passing their test to further enhance their riding skills.

Changes must be in line with the Vienna Convention, which sets out minimum international licensing regulations and maintain training and safety standards - to ensure the continued exchangeability of licences for those moving away from the UK.

Motorcycle Licences - Earliest Access Ages and Requirements

	16	17	18	19	20	21		
Moped staying on CBT only	CBT 1 / Provisional Moped licence		CBT Plus		Full Moped (4kw) only after ATB Assessment		CBT Only Pathways - an end to permanent learners	
A1 staying on CBT only		CBT 1 / Provisional A1 licence		CBT Plus		Full A1 (11kw) after ATB Assessment		
Moped to A1- Progression at age 16"	CBT / Provisional Moped licence	Access to A1 (11kw) machines after ATB Assessment						Reward for Passing the Moped Test at 16
A1 Full licence Option - A1 at 17		CBT / Provisional A1 licence	Full A1 (11kw) machines after ATB Assessment					Options From Age 17
A1 to A - Restricted A from 18, Unrestricted A from 20		CBT / Provisional A1 licence	Restricted Full A (35kw) from age 18 after DVSA Examined Test		Unrestricted Full A licence from two years later but after ATB Assessment completed			
Direct Access to Unrestricted A - Available from 21						CBT / Provisional A1 licence	Unrestricted A after DVSA Examined Test	

Utilises to best effect the ATB network to get riders assessed, have them progress their riding and relieve pressure on DVSA test centres

Simplified progression: Moped - A1 - A. The A2 licence abolished for new riders, flexibility on entitlements for full A1 riders and assessments built into Full A on the progressive route

System designed around a single event DVSA Examined test to ride the most powerful bikes, but option to remain on low power bikes via ATB Assessment

Moped or A1 riders can take an ATB Assessment for Full Moped or A1 at any time during the four years maximum granted on provisional licences.

Failure of Assessment after four years on the CBT only route would require the rider to immediately book further training and assessment to keep on riding.

Progression from A1 to A will require a DVSA Examined test, with a further ATB Assessment if the 'Restricted A' pathway is chosen.

16 year olds passing full Moped ATB Assessment would gain an A1 licence with 11kw restriction

Riders with a 'Restricted A' would have no time limit to take an ATB Assessment after the 2 year wait - they could choose to remain on this licence after passing a DVSA Examined test

The NMC's specific Proposals in Detail

1. Finally implement the changes to CBT syllabus that the Government announced in 2017 and require theory and hazard perception testing prior to taking CBT.

2. Digitise the administration of the CBT system to reduce the current burden of manual administration.

The Government announced changes to improve the syllabus for Compulsory Basic Training in 2017. These were welcomed by the motorcycle sector, yet over six years on they have yet to be implemented, despite several proposals being dependent only on secondary legislation in Parliament. The NMC, along with its partners across a range of public and private sector organisations, calls for no further delay in the implementation of the 2017 changes. They should be implemented now.

The NMC supports the provision of online training and testing for the driving theory test and also hazard and risk perception. We recommend that theory testing and hazard perception testing is completed prior to the CBT course.

The CBT certificate issuing system is still largely manual. Implementation of a fully automated system comparable to that currently utilised for MoT certification is essential. Also, it became evident during the Covid19 pandemic that the inability to extend the life of CBT certificates caused significant hardship to those motorcyclists unable to refresh their CBTs. Therefore, the ability to enable CBT certificate extension during a period of national emergency, or other extraordinary events, will require legislative amendment.

3. First CBT to remain valid for two years. After two years, users should take a new 'CBT Plus' (also valid for two years) to improve their skills rather than simply maintain their current level. After 2 years, riders on CBT Plus to take a final assessment carried out at their ATB to gain a full licence for the Moped or A1 categories or, in the case of those riding A1 on CBT who want to progress to larger bikes, take a DVSA Examiner test to gain a 'Restricted A' licence - see below.

Repeating the CBT syllabus every two years without any test requirement fails to enhance skills or motivate users to take a test. Currently, approximately 180,000 CBTs are issued annually, but only around 45,000 mod2 test passes are recorded. It is estimated that there are currently estimated to be around 220,000 riders perpetually languishing as "learners" on CBT certificates with no incentive or desire to obtain a full licence or to further enhance their riding skills.

The NMC supports a different approach. Riders should first take their Theory and Hazard Perceptions Tests followed by an initial CBT course, which would remain valid for two years. If they have not achieved full licence status by this point, CBT would be renewed via a new 'CBT Plus course' - also valid for two years. On expiry of the CBT Plus, this should then be followed by an Assessment carried out at a local DVSA Approved Training Body. Successful completion will grant the user a full AM or A1 licence, as applicable.

A new syllabus should be developed for CBT Plus, adding additional skills to build upon the foundation skills gained during CBT training, plus what they have learned after two years on the road. The CBT Plus will move the user closer to full licence standard and will help prepare them for the assessment they must take before their CBT Plus certificate expires.

Should users fail the ATB assessment, the NMC does not support a riding prohibition. A mechanism can be devised for users to take further training and then return for an Assessment focussed on previous areas of weakness. Timeframes for this after the expiry of CBT Plus and the syllabus for CBT Plus itself will need to be built into legislation.

To provide flexibility, users can choose to take the AM or A1 assessment at their preferred ATB at any time after completing their first CBT.

This proposal addresses the issue of 'permanent learners' while setting in place measures which will engage novice riders in continuous skills improvement. The key safeguard is that although remaining on a provisional licence for more than four years will not automatically be permitted, riders will still have a pathway to full AM or A1 if they wish to continue riding.

4. Licence upgrades from Moped to A1 machines to be carried out by a DVSA certified motorcycle instructor. The instructor must be working within an Approved Motorcycle Training Body (ATB) and will undertake additional training to become a DVSA certified assessor. Under the current system a rider might take the identical DVSA Examiner test 3 times, which represents a barrier rather than an educational step. This will ensure additional training is undertaken to help improve riding standards.

5. Combine the current 2 test modules into a single test event, reducing the complexity, expense and bureaucracy in the current system.

Addressing the issue of perpetual learners within the current testing regime, will require a substantial increase in test capacity. Currently, there are approximately 57,000 Module 1 tests and 45,000 Module 2 tests conducted, while around 180,000 CBTs are issued annually. Less than 1,000 users take an A1 test each year. DVSA would need significant investment to accommodate the increased number of tests if users were required to take an A1 test after

completing CBT. Limited availability of local DVSA multipurpose test centres also makes it inconvenient and costly for candidates and ATBs, who often must travel long distances. Motorcycle testing demand, especially during the summer months, surpasses the available capacity, resulting in extended waiting lists.

Currently the test is divided into 2 parts; Module 1 off-road for basic bike handling skills and Module 2 for on-road competency. Requiring two separate tests exacerbates the problem and the large land area needed for Module 1 testing incurs disproportionate costs for DVSA. The process can be repeated several times on the progressive licensing route. Repeating identical Module 1 and 2 tests for progressive licence access does not raise riding standards or improve skills; it merely confirms that candidates meet the same required standard.

The NMC supports a reversion to the single test module that was in place prior to implementation of the second stage of 2DL. This would simplify administration of riding tests, remove the requirement for off-road areas, and keep costs down.

A barrier to this has been the speed requirement for the so-called "brake and swerve" element of the Module One. This exercise should be revised while maintaining the training principle that lies behind it - but requiring smaller estate for an initial off-road element of a single event test.

ATB instructors currently assess those with no prior motorcycle or road experience and certify them as competent to ride unaccompanied on a moped or motorcycle up to 11kW for two years, upon completion of a CBT assessment. These instructors should undergo additional training to become DVSA certified assessors, approved to carry out all licence acquisition for vehicles up to 11kw. These instructors currently train users to the required test standard, so will have no difficulty in identifying the appropriate competence level to grant the user a full AM or A1 licence.

The benefits of this approach include reduced administrative and financial burdens on the DVSA, easier access to tests, greater availability of tests, plus reduced costs, travel distances and waiting times for candidates. There is also the added benefit that DVSA Examiners can focus on test provision for the larger capacity A licence classes.

Alongside DVSA accreditation requirements for the assessors, NMC also supports recommendations that ATBs offering licence acquisition assessment are subject to more stringent standards checks, and are monitored closely by DVSA to ensure the required standards are being maintained.

Restricted and Unrestricted 'A' category tests (see below) should continue to be conducted by DVSA examiners by way of a single event test. The exception to this would be for those who have successfully passed a DVSA Examined 'Restricted A' test. The NMC proposes that the Assessment which can 'upgrade' a Restricted A licence to an Unrestricted A licence (if successfully completed) would be conducted by DVSA certified assessors from an approved ATB.

6. Remove the A2 licence category. This licence category is not recognised under the Vienna Convention. A DVSA Examiner test on the progressive route will grant access to an 'A-Restricted' licence - available from age 18 - allowing access to 35kw machines. The restriction can be lifted once a compulsory ATB delivered assessment is completed – which will be available from two years after the test is passed.

The A2 licence is not recognised under international conventions to which the UK and EU are Parties and is a peculiarity of the EU system. Its introduction has not led to improvements in motorcycle safety, but it has added to the perceived and actual complications of the 'stepped' route to a full A licence.

The NMC proposes that this licence class is abolished and replaced with the system outlined in 4 & 5 above. where riders wishing to progress from A1 to A under the age of 21 will be required to take a single event DVSA Examined test which, if passed, will result in the award of a 'Restricted A' licence. This would grant access to 33kw machines, the current A2 specification, which is well catered for in the motorcycle market.

To remove the restricted status and gain a full 'Unrestricted A' licence, candidates would undertake an Assessment which would be conducted by a DVSA certified assessor from an approved ATB

Although deregulatory, this change would be an improvement on the pre 2009 arrangement where the restricted A licence was automatically derestricted two years after passing the A1 test, with no further requirement for training. Requiring a training element would also preserve the principle of licence 'graduation', while removing the bureaucratic and psychological barrier of repeating the same test.

7. Allow Moped riders access to A1 machines once an ATB assessment has been passed. This would provide an incentive for 16 year old moped riders to get trained and be assessed.

The NMC supports a change in the licensing scheme so that passing the ATB assessment on a moped will gain access to A1 machines. This will reward those aged 16 who choose to move beyond CBT and decide to train and be assessed. (those aged 17+ will normally train and test on an A1 bike unless undertaking direct access.) The basis of this access at age 16 in licensing regulatory terms will need to be determined.

This follows the basic principle proposed for the 'Restricted A' category i.e. successful A1 test candidates would, from age 18, be able to ride machines up to 33kw before undertaking a further ATB Assessment to gain access to all

motorcycle types. This would provide an incentive for riders to undertake further training and take a test.

Implementation of the graduated licensing scheme resulted in disincentives to riders to progress through the staged licence categories. The first of these is that passing the A1 or A2 test only means that a rider can use the same category machine that the test was taken on. This is particularly obvious with respect to the A1 licence; there is a proportion of riders who, rather than taking a test for a full licence, which gains them little in practical terms, simply retake CBT every two years. The benefits of taking the full test are only removal of L-plates and the possibility of taking a passenger. Normally it makes no difference to the rider's insurance premium, indeed that can go up. With respect to licence upgrades few discern much benefit from repeating exactly the same test, just on a bigger machine, with the result that many wait until they can take the Direct Access route.

8. Return the minimum age for Direct Access to age 21.

It is not easy to draw a definitive conclusion from analysing the safety effects of the change from 21 to 24 years old for Direct Access. Although on the face of it, the statistics do show a reduction in casualties in the 21-23 age group, the figures are not granular enough to determine if this is as a direct effect of the 3DLD age change, or if casualties are among a notable cohort with full licences, or whether the effect is through denial of the direct access route to the 21-23 year age group – or other factors, such as riders moving across to car driving because of the current barriers to obtaining a full motorcycling licence.

Safety policy should not be formed on the basis of banning people from using vehicles. Indeed, this is one reason why the pre DLD era 'one year ban' for those who failed to pass a motorcycle test within two years of gaining a provisional licence was repealed.

Therefore, despite some positive figures (on the face of it) to point to, there is little direct evidence that raising the age of Direct Access to 24 has led to improvements in motorcycle safety overall by itself. But the age change has denied direct access to the A category licence for people in the 21–23-year age group, which is both unique and discriminatory when the age of access to other classes of vehicle licence are considered. For example, a car test pass gains legal access to the most powerful machines from age 17. HGV C and C+ can be accessed from age 21.

The Direct Access minimum age should therefore be returned to 21 years old.

9. Redefine the Minimum Test Vehicle specifications for electric motorcycles in each licence category. The current criteria do not recognise that electric motorcycles deliver power differently and it is not currently possible to obtain a full 'A' licence using an electrically powered machine.

The NMC welcomed the redefined criteria of ICE powered Minimum Test Vehicles (MTV) for the A2 test. The current criteria for electric MTVs however is unsatisfactory. The inclusion of the 'continuous power rating' criteria, in particular for the A category MTV, makes it impossible to take the test for a full A licence on an electric motorcycle because there are no machines on the market which fit the defined criteria for a minimum test motorcycle.

The NMC understands that, fulfilling the current criteria is likely to produce a machine with undesirably fast acceleration. Given that more is now known about the performance of electric motorcycles, the criteria for electric motorcycle test machines needs to be redefined.

10 Incentivise access to post-test training. Once a rider gains a full licence in any category, he or she should be encouraged to continue skills improvement via post-test rider training. This needs to be properly incentivised so that it becomes normal to undertake additional training

Research from IAM RoadSmart shows that advanced motorcycling training is very highly rated by those who have undertaken it. Comparing non IAM riders with IAM riders also shows better safety attitudes and more confidence in their motorcycling. However, access to advanced training from organisations such as IAM RoadSmart and RoSPA is often limited by volunteer capacity. Advanced riding courses usually require several months of training and a final 90-minute test. These providers are DVSA accredited with new higher grades of advanced training now also available.

Many road safety partnerships have identified motorcycling as a priority road safety area and local schemes have been developed to introduce riders to the concepts of advanced riding. These include Bike Safe, Rider Refinement North (in Scotland) and a variety of local initiatives delivered through local partnerships. The British Motorcyclists Federation (BMF) has developed its own in-house "Blue Ribband" advanced motorcycle skills course and the MCIA is also working to promote post-test schemes. Most of these schemes are short one or half day courses with a police officer or approved trainer carrying out an assessment of competence but without a final test.

Short course offerings have suffered in the past from a lack of consistent funding and support from police forces across the whole of the UK. The DVSA does offer a 'national' scheme called ERS (Enhanced Rider Scheme) as an introduction to further training. Most courses tend to target those returning to motorcycling and using larger bikes in rural areas. Outside London few projects have been set up to help the youngest riders on scooters and mopeds. The NMC would support a more consistent approach and urges all police forces across the UK to support Bikesafe and

deliver it within their area. The NMC would also like to see consistent high profile support and signposting to post test and advanced rider training options by government agencies such as DVSA and the DVLA. This could best be achieved by allowing providers to promote their services via the DVLA licence database.

Many of the main advanced rider training providers offer specially negotiated insurance discounts but the NMC would urge all insurance providers to incentivise take up by offering discounted insurance quotes to those riders undertaking advanced training.

Attendance at a speed awareness course has been shown to reduce repeat offending among car and van drivers, but no tailor-made course is available for police to offer motorcyclists who may have come to their attention in respect of low-end speeding offences detected by automatic camera devices or police officers. The NMC would support the development of specific 'alternative to prosecution' courses for motorcyclists to provide advice to change on-road behaviour and reduce re-offending. These courses should be made readily available across the UK, including in the devolved nations.

Action Points - Post test training

- **NMC endorses the safety benefits of post-test training and advanced motorcycling**
- **NMC urges all police forces across the UK to sign up to the delivery of the BikeSafe scheme in their area**
- **NMC urges all insurance companies to offer incentives to those who take post-test training**
- **NMC would like to see consistent long-term funding from the government to support the Bikesafe scheme**
- **NMC urges DVLA and other government agencies to endorse post-test training, allowing providers to access their rider licence databases**
- **NMC supports the work of the Motor Cycle Industry Association (MCIA) in bringing together post-test training providers and promoting consistent standards**
- **NMC notes that more schemes are required to assist moped and scooter riders in large urban settings**
- **NMC supports the development and nationwide delivery of specific alternative to prosecution courses for motorcyclists**

All changes to licensing must conform with the Vienna Convention and maintain high overall safety standards to ensure the continued exchangeability of licences for those moving away from the UK.

The reasons for maintaining the UK's position as Contracting Party to Vienna are set out above. But in addition, the ability for UK citizens to be able to exchange licences when moving abroad needs to be maintained. Rules for this differ internationally and the EU itself does not have a common position, with rules on licence exchange differing between Member States. But all countries internationally will need to be confident that any changes to the UK's licensing system work towards greater safety.

Indeed, this area in itself offers justification for adopting the proposals in this document, given, as illustrated above, overall motorcycle safety progress under the 3DLD regime has, if anything, moved backwards.

Furthermore, the UK currently enjoys one of the best road safety records on a global level. We urge the Government to make more of the successes the UK has achieved when, for example, discussions take place in the international road safety arena. In many areas of road safety, within and beyond licensing, there are UK best practices which should be advocated far more strongly internationally, particularly at UN, OECD and WHO level. CBT is a good example of this.

In Summary

The NMC again emphasises that as part of this 'evolution' of testing and training, there should be no dilution of standards, or removal of any aspects that work towards safer motorcycling. But instead, best practices need to be applied more intelligently, so that riders are incentivised and encouraged to gain a full licence at the level they desire. Changes to the Driving Licence Directives since 2009, as they apply to motorcycles, have demonstrably not worked to improve safety. They have also proved to be a barrier to motorcycling. It is time to think again and develop a training and licensing regime that works for both motorcyclists and broader road safety policy.

The Case for Change In detail

Background to the current legislation.

Following the UK's departure from the EU, there is now an opportunity to reshape the UK's motorcycle testing and training system to more closely align to the specific needs of UK motorcycling. Moreover, there is also an opportunity to deliver on the UK's transport needs; with motorcycles providing a space efficient and environmentally friendly means of accessible and sustainable transport that contributes positively to reducing pollution levels and traffic congestion in towns and cities.

Previously, the UK was subject to regulations imposed by the EU's various Driving Licence Directives (DLD). The first notable impact of these was via the Second Directive (2DLD) in 1997 which introduced 'stepped licensing' in a basic fashion. It replaced a previous system which allowed moped access at aged 16 and larger bike access from aged 17, with a test on a 125cc motorcycle gaining access to all motorcycles. The Compulsory Basic Training (CBT) regime was also in place (from 1991). Until 2001, failure to take and pass a motorcycle test within two years of receiving a provisional licence resulted in a one year ban from riding motorcycles. This was later repealed after it was shown to be discriminatory.

The Second Driving Licence Directive

2DLD introduced the following steps in 1997. This was a partial implementation of the Directive.

- **Moped licence from age 16 remained. (plus CBT for all licence classes)**
- **A1 (125cc) from age 17 A test pass allowed access to a medium power (33bhp) machine for two years, after which access to all motorcycles was automatically granted**
- **Direct Access option from age 21, with a test pass on a machine of more than 498cc and 46.5bhp, allowing immediate access to all motorcycles.**
- **An option to upgrade a licence via 'accelerated access'.**
- **The theory test was introduced in 2001 for all road users.**

In 2009, the final elements of 2DLD were implemented. This was a far more complex set of rules which placed requirements on the form of the motorcycle test, requiring in the UK special off road areas for the observation of manoeuvres around cones which in some ways appeared similar to the 'part one' test which was a feature of UK testing during the 1980s until its replacement by Compulsory Basic Training.

Specific requirements of the test meant that after much discussion the test was split into two parts, Modules One and

Two. This proved controversial and the then Driving Standards Agency decided to acquire large areas of land to conduct the test - part of which required a 'brake and swerve' manoeuvre at 50kph (31.06 mph) - partly due to this speed exceeding the 30mph urban speed limit. The original plan was for 77 module one test centres, but only 37 were ready when the new test was implemented. The new requirements had a significantly negative effect on the training industry, with the implemented changes to, plus difficulties in getting a motorcycle test, leading to reduced capacity for motorcycle training and licence acquisition.

The Third Driving Licence Directive

3DLD was introduced in January 2013. The UK government did not support this Directive and abstained on the Council votes within the EU on 3DLD, given the predictable negative impacts on both motorcycling and the training and testing system. 3DLD further complicated access to motorcycling by formalising stepped licensing and introduced the following steps:

- **Moped licence from age 16 remained. (plus CBT for all licence classes)**
- **From age 17, the A1 licence allowing a full licence up to 125cc and 11kw/15bhp.**
- **From age 19 a new A2 licence allowing a full licence up to 35kw/47bhp on any size motorcycle. The motorcycle test must be done on a machine of at least 395cc with a power output of between 20kw/27bhp and 35kw/47bhp.**
- **Direct Access to all motorcycles moved from age 21 to age 24. The motorcycle test must be done on a machine of at least 595cc with a power output of at least 40kw/54bhp.**
- **Progressive Access. This regime allows people to gain a full motorcycle licence at an earlier age by taking the same tests three times on progressively larger motorcycles - provided they wait a full 2 years between tests. Candidates only need to take the CBT and Theory Test once.**
- **An option to upgrade a licence via 'accelerated access'.**

In January 2021, 3DLD was integrated into UK domestic law, which currently mirrors the requirements of the Third Directive.

How have the Directives Impacted on Motorcycle Safety?

The following table reveals the effect of the DLDs on the UK headline motorcycle casualty record. This compares the safety effects of 3DLD compared to the previous 2DLD regime.

2DLD				3DLD			2 versus 3 DLD
PTW Cas Numbers							
	1997	2012	% Change	2013	2022	% Change	
Deaths	509	328	-35.56	331	350	5.74	3DLD Negative
Serious	5983	6733	12.54	6552	5618	-14.26	3DLD Positive
KSI	6492	7061	8.76	6883	5968	-13.29	3DLD Positive
Slight	18046	12249	-32.12	11869	10975	-7.53	3DLD Slowed Progress
All	24492	19310	-21.16	18752	16943	-9.65	3DLD Slowed Progress
PTW Cas Rates (per mile travelled)							
Deaths	109	112	2.75	119	123	3.36	3DLD Negative
KSI	2620	2413	-7.9	2457	2103	-14.41	3DLD Positive
All	9956	6613	-33.58	6721	5971	-11.16	3DLD Slowed Progress

The table reveals that on the majority of measures results have been mixed, with progress in less than half of the measures compared to the 2DLD period. Worryingly, the number of people killed – the most important measure of safety – rose notably, reversing some safety gains made during the 2DLD era.

The figures also worryingly call into question how fit for purpose 3DLD is against the core purpose of delivering testing and training 'to improve safety'. There are strong indications that it is not.

It is instructive to look at safety progress in the immediate pre-DLD era from the period after CBT was introduced (table below). Significant reductions in casualty on all measures were recorded, though minor rises in casualty rates per mile were recorded. This illustrates that the correct measures, when applied at a purely national level, can have a positive, indeed significant effect on casualty numbers. This is not to criticise the motivation behind the EU's efforts in this area – the European Commission has an understandable and commendable desire to improve motorcycle

safety. But the experience of 3DLD in particular reveals the difficulties of a 'one size fits all' approach to diverse national situations and roads environments.

Pre 2DLD - from CBT Introduction			
PTW Cas Numbers			
	1991	1996	% Change
Deaths	548	440	-19.71
Serious	7954	5768	-27.48
KSI	8502	6208	-26.97
Slight	22249	16925	-23.93
All	30751	23133	-24.77
PTW Cas Rates			
KSI	2538	2653	4.53
All	9179	9886	7.48

How Have Test Numbers and Availability Been Affected?

Prior to the implementation of the second stage of 2DLD, there were an average of 80,852 tests conducted per year between 1998/9 and 2007/08. After the new test was introduced under 2DLD, this average fell to 47,783 (2009/10 versus 2017/18). This comparison is made between the pre 2009 test and Module 2, given that both tests were/are the final test before gaining a full licence. (Module 1 data tends to follow Module 2 fairly closely.)

Currently, there are approximately 57,000 Module 1 tests and 45,000 Module 2 tests conducted, while around 180,000 CBTs are issued annually. Less than 1,000 users take an A1 test each year.

The implementation of the two part test under the latter stages of 2DLD, plus 3DLD changes, turned UK testing and training on its head which had a profoundly negative effect on the training industry. There was significantly reduced access to training and as illustrated above, a much reduced testing capacity. The logjams caused in the early days of Module One testing via multi-purpose test centres, which struggled to meet demand, has never been fully resolved and long waiting lists remain the norm for motorcycle tests, with training schools sometimes having to partake in daily negotiations with the DVSA to secure tests.

Although the DVSA is much criticised on this point, the NMC does appreciate that the situation is partly as a result of demands from other aspects of DVSA business. In effect, we are where we are and we now need to look forward given that the UK now has the opportunity to create positive change to the testing and training regime. The DVSA has indicated that it is open to new ideas, which is very welcome.

What effects have there been on motorcycle use and the new bike market?

Motorcycle PARC data reveals that after the first stage of 2DLD was introduced in 1997, the number of motorcycles in use on UK roads rose by 55.5% to 2009 - with notable road safety improvements during the period. Since the introduction of the new motorcycle test (to 2021), this fell by 9.84%. Over the same periods, the new motorcycle market fell by 7.4% and then rose by 2.6% respectively, though it should be noted that the new motorcycle market rose by 8% between the whole period between 1997 and 2021. (Sources DfT/MCIA)

Further analysis reveals that the 2008 financial crisis and its aftermath, combined with a lack of motorcycle test availability, contributed to a significant fall in new motorcycle sales, with these falling by 17.6% between 2009 and 2013. Since then (to 2021), new motorcycle sales have risen by 24.4%. (MCIA)

The data reveals that the new motorcycle test has significantly hit full licence test availability while, in the meantime, the PARC data has remained stable and new motorcycle sales have made some recovery from the impact of the new test and other external factors. It is also known that the sale of second hand motorcycles has remained strong since 2009/10. This analysis does not include Covid-19 pandemic effects, though these are known to be profound on all measures.

We therefore have a picture of lower numbers of full licences gained due to reduced test provision against a backdrop of sustained and slightly increased overall interest in motorcycle use, particularly since 2012. In other words, more motorcycling but fewer tests taken.

This, combined with notable market increases in 125cc and lower machines, suggests that many riders are simply renewing CBT and not taking the next steps to acquiring a full licence. The safety impact of this is clear to see. Transport For London (TFL) estimate that around 60% of Powered Two Wheeler (P2W) riders killed or seriously injured on London roads were riding a 125cc or lower machine on a CBT licence.

Getting it Right Evolution, not Revolution

The NMC does not advocate ripping up the entire system and starting again. Whatever the UK does, it will need to meet the requirements of the Vienna Convention as a contracting party and much has been learned in recent years from the experience of both 2 and 3DLD, not all of it negative.

The experience of implementing and managing the testing regime under the EU DLDs has taught us much about what works and what does not. Considerable change to UK licensing, including how testing and training is done was imposed from 2009 onwards. Much of this appeared to make some sense, but the way the UK implemented the Directives did give rise to significant problems in testing provision and application, not least the need for new estate to conduct part one of the two part test. Availability of tests and backlogs have been an ongoing issue, enhanced by the Covid-19 pandemic. The statistical analysis above speaks for itself.

That said, the UK enjoys high standards in testing and training and it is essential this continues for reasons of road safety. It is now possible for the UK to introduce changes which will make testing and training more accessible, easier to understand and with requirements that are less onerous for riders - while maintaining, and in many cases improving, standards and engagement.

What about the Impact of International Law?

Licence requirements are set by international convention, via the 1968 Vienna Convention on Road Traffic. For motorcycles, there are two categories noted; category A Motorcycles and category A1, Motorcycles with a cubic capacity not exceeding 125cc and a power not exceeding 11kw (Light Motorcycles) (Annex 6.8 & 6.9). The Convention does not prevent jurisdictions from creating further categories or requirements, but these may only be valid in the territory where they are applied, for example, the EU and UK licence Category A2 is not recognised in the Convention. The NMC has received reports about people who have found their A2 licence to be invalid when trying to hire or use a motorcycle in some countries outside the EU.

Vienna allows a lot of flexibility for training and 'verification' of skills. Indeed, it only specifies that this should take place, with very limited specific detail about how it is done:

Article 41 – Driving Permits

1. (a) Every driver of a motor vehicle must hold a driving permit;

(b) Contracting Parties undertake to ensure that driving permits are issued only after verification by the competent authorities that the driver possesses the required knowledge and skills; the persons authorised to check if drivers have the necessary knowledge and skills must have appropriate qualifications; the contents and procedure of both theoretical and practical exams are regulated by national legislation;

(c) Domestic legislation must lay down requirements for obtaining a driving permit. In particular, it shall specify the minimum ages for holding a permit, the medical conditions to be fulfilled and the conditions for passing the theoretical and practical exams;

(d) Nothing in this Convention shall be construed as preventing Contracting Parties or subdivisions thereof from requiring driving permits for other power-driven vehicles and mopeds.

Validity in other countries which are 'Contracting Parties'

Article 41 goes on to state:

2. (a) Contracting Parties shall recognize:

(i) Any domestic permit conforming to the provisions of Annex 6 to this Convention; (style of the driving permit)

(ii) Any international permit conforming to the provisions of Annex 7 to this Convention, on condition that it is presented with the corresponding domestic driving permit (style of international driving permits,

as valid for driving in their territories a vehicle coming within the categories covered by the permits, provided that the permits are still valid and that they were issued by another Contracting Party or subdivision thereof or by an association duly empowered thereto by such other Contracting Party or one of its subdivisions;

(b) Driving permits issued by a Contracting Party shall be recognized in the territory of another Contracting Party until this territory becomes the place of normal residence of their holder;

Exclusions

Vienna does not apply learner driver permits and in the case of motorcycle licences, Contracting Parties may refuse to recognise the validity of a licence issued to someone under the age of 18. This does allow some national flexibility, for example the NMC proposals contain a provision for a Restricted A: The industry also proposes some flexibility in their own position.

Finally ...

The UK is free to evolve the motorcycle testing regime any way it chooses, provided this meets the requirements of the Vienna Convention of which the UK is a Contracting Party, if it wants licences to be recognised internationally. The EU, as a Contracting Party, cannot refuse to recognise changes to UK licence requirements, as long as they comply with Vienna Convention requirements.

However, different countries within the EU can take a view on licence exchanges. Therefore, high quality testing and training must remain and continue to be enhanced - but within a less complicated framework of licensing.

Therefore, the NMC urges the Government to evolve training in testing along the lines of what the UK requires, not what the EU currently does, or is planning to do under the recently proposed 4DL. The higher rules for both the UK and EU when it comes to riding licences is equally dictated via international convention and there is no legal or practical reason to maintain alignment with the EU DLDs. Indeed, even within the EU, testing and training specifics are not fully harmonised across member states. As per international rules, the UK will continue to recognise the licences held by visiting riders from EU member states and other countries. In effect, there are no legal barriers to change.

Further Reading

[Vienna Convention on Road Traffic \(1968\)](#)

[MCIA 'A Licence to Net Zero](#)

[NMC Resources](#)



About The NMC

The National Motorcyclists Council (NMC) is the UK coalition of motorcycling representative organisations, which works together on commonly held positions about issues where motorcyclists seek to change or influence government policy. It also researches issues to both inform campaigning and support the individual work of its members.

The NMC's mission:

'Working together to help assure a positive and sustainable future for motorcycling'

Members and Partners

The NMC's current members comprise almost all UK motorcycling representative organisation, plus the sport and road safety interests. NMC members have a combined membership of around 200,000 individual riders. The NMC also has wider partnerships with industry and riders groups internationally.

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