

Australian Motorcycle Council's submission on SA Department of Planning, Transport and Infrastructure's motorcycle licensing proposals

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The Australian Motorcycle Council (AMC) appreciates the opportunity to contribute to the discussion on motorcycle safety in South Australia initiated by the Minister for Road Safety, the Hon Jennifer Rankine MP, and the Department of Planning, Transport and Infrastructure (DPTI).

Constructive and effective regulations, bills and laws pertaining to motorcycling and motorcycle safety are necessarily dependent upon consultation with those who have a specific interest in, direct experience of or familiarity with motorcycling in order to reflect the best interests of those who ride.

Motorcyclists, from learners onward, quickly become very familiar with road infrastructure and traffic management issues which threaten their welfare. Hence, the facilitation of open-minded accessibility, consultation with motorcyclists and their representative bodies, the development and support of mechanisms which enable the implementation of effective and progressive initiatives, and a government-motorcyclist bipartisan approach to road safety has the greatest likelihood of achieving positive outcomes in the long term.

On the whole, motorcyclists take a keen interest in their own safety; It is therefore heartening that the South Australian Government is sending this very positive, inclusive message to the motorcycling community.

The following points reflect the AMC's position on the Government's proposals for the enhancement of motorcycle safety, and include additional recommendations for progressive action.

NB. For the sake of simplicity, the term 'motorcycle' may be considered to include 'scooter'.

1. Requiring a car licence to be held for at least 12 months before being eligible to apply for a motorcycle learner's permit.

The AMC does not support this proposal.

A similar requirement was introduced in Queensland in 2007 for the same reasons proffered by DTEI, but the forecast reduction in motorcycle casualties attributable to the measure has not occurred. This absence of impact is accompanied by a dearth of data or other evidence vindicating the change.

The argument for this proposal appears to be negated by that for Proposal 4, which argues that specific training be required for moped riders as the experience gained as a car driver, regardless of the number of years in that capacity, is inadequate for riding a motorcycle (or moped).

While some weight may be accorded the argument that motorcycling is a more complex task than car driving, one should be cautious about according it an unwarranted degree of weight, as the only substantive difference is the need to balance on two wheels while manipulating the same kind of controls (or controls of similar purpose).

The vast majority of would-be licensees have already learnt such balance on a bicycle, hence becoming familiar with a motorcycle's controls while staying upright is less of a challenge than posited.

It is difficult to accept DPTI's proposition that "learning to control a motorcycle, while learning to deal with traffic and other rider safety hazards, is a significant road safety problem" (p.9), given that the RiderSafe training course does not include an on-road component. All car driver training and testing is conducted in the active road environment. It seems illogical and not conducive to safety to only train motorcyclists off-road then send them into the traffic mix to survive by trial and error while arguing that such a process is unsafe.

We must also be careful of underestimating the learning capacity of those who choose a motorcycle as their first form of powered transport compared to that of car drivers. Being much smaller, lighter and more manoeuvrable than a car, the size and behavioural characteristics of a motorcycle can be quickly appreciated by most learners.

Indeed, largely due to their exposure to the elements, motorcyclists tend to be far more aware of how road, vehicle, traffic and weather conditions affect safety than the majority of car drivers, hence they also tend to be better – that is, more alert, considerate and courteous – drivers when in their cars, and certainly more aware of motorcyclists. (Anecdotal evidence suggests that more than 80% of motorcyclists own cars.)

A car, of course, offers better protection and does not fall over when mistakes are made, but this in itself may well induce an unrealistic sense of security in a learner-driver's mind such that potential lessons in safe practice may not be recognised, let alone learned.

The argument for this proposal only considers the learner-rider in relation to the learner-driver, rather than anyone else who could be hurt in a crash. The weight of a car is also many times that of a motorcycle, and the number of people it can carry greater, with a concomitant potential for causing far greater harm to other people, though the driver might remain unscathed.

The argument for this proposal also assumes that the novice rider is a young, immature and inexperienced road user, whereas the average age of the novice motorcyclist is in the vicinity of 30; in NSW, for example, the average age is 33, and it would be reasonable to assume that this is reflected in SA. Hence this requirement would disadvantage a preponderance of novices who would already be quite familiar with the road and traffic environment.

It is for these reasons that motorcyclists believe that, rather than requiring learner-riders to hold a car licence for twelve months prior to learning to ride, the reverse should be applied: that is, that learner-drivers should be required to have twelve months' experience on a motorcycle before being able to drive. The benefit of such a requirement would be twofold, in that not only would all drivers be much more aware of

motorcyclists, and hence would not feature so significantly in the causal factors of many motorcyclists' crashes, but they would generally be better, and hence safer, road users.

2. A compulsory six-month period between the Basic and Advanced RiderSafe training courses.

The AMC does not support this proposal.

RiderSafe instructors already strongly recommend that Level 1 novices spend at least six months gaining experience before attempting Level 2, and given that it is not possible to determine how much experience one gains during that time, let alone how much any given individual might need, this proposal would amount to legislation purely for its own sake. Further, in order to pass Level 2, a novice must be demonstrably competent, and, by implication, have sufficient experience. The current system also caters for riders of varying ability, learning rates and opportunity by enabling them to determine when they are ready to attempt Level 2, whether that be three months, six months, or longer.

Of further consideration is the absence of data indicating any relationship between the amount of experience as a factor of time between novices doing the Level 1 and Level 2 courses and the likelihood of their crashing.

3. Require all licence holders endorsed with R-Date to have zero blood alcohol concentration (BAC) while riding a motorcycle.

The AMC does not oppose this proposal in principle.

However, given that the smallest amount of alcohol in one's blood, be it from medication or food, could cost a novice their licence, and that the accuracy of the initial testing devices would be a critical factor, this proposal warrants balanced evaluation.

Such evaluation should also take into consideration that a large proportion of novice riders have had their car licences for many years and are familiar with not only traffic management but the physical effects of alcohol.

4. Introduce specific licensing and training requirements for riders of mopeds.

The AMC supports this proposal.

The problem with the current system is that, given that riding a motorcycle involves specific skills, car drivers would not necessarily have acquired such skills and, hence, may be at risk, or put others at risk, of injury through crashing.

The value of rider training in mitigating such risk is recognised throughout the world, and this is recognised in the Government's RiderSafe program. It is eminently logical, therefore, given that mopeds (50cc scooters) are more akin to a motorcycle than to a bicycle, that a training and licensing course for scooters be established.

Such a program should be positively structured with regard to cost, content and duration in order that it does not provide a disincentive to those considering taking up scooter riding. The program should also contribute RPL (recognised prior learning) to the

standard RiderSafe motorcycle training course to enable those wishing to develop their riding skills further to avoid costly repetition of training.

NB. 'Millilitres' is an unusual and cumbersome term in place of the more common metric equivalent, 'cubic centimetres'. It seems to be used exclusively for small-capacity motorcycles, while the engines of all larger motorcycles continue to be defined by the latter term.

5. Riders with an R-Date licence endorsement (including riders of mopeds) to be banned from carrying a pillion passenger.

The AMC does not oppose this proposal in principle.

The argument for this proposal is, in essence, that a motorcycle is less-easily controlled with the added weight of a pillion passenger, together with the possibility that a novice passenger could easily upset the stability of the motorcycle, as the pillion rider has a high degree of control over the bike.

On the other hand, an experienced motorcyclist, including an experienced pillion passenger, on the back of a novice's bike could improve stability if needed, and could also advise the rider on safe practices en route, particularly regarding carrying passengers.

Given that "the numbers of killed or injured riders carrying pillion passengers were consistent across all ages" (p.15), the efficacy of the argument for this proposal is dubious, and there appears to be a lack of data justifying it on other grounds.

On the whole, however, as it would not be possible to ascertain a pillion rider's skill prior to riding with a novice, and that a pillion rider might not be able to prevent a given crash occurring, with a concomitant likelihood of two people being hurt rather than one, this proposal may enable a novice to learn through experience without risking others' lives.

6. Explore options for a Motorcycle Safety Fund dedicated to motorcycle safety initiatives to address high and disproportionate risks.

The AMC does not support this proposal.

This proposal argues that such a fund would be derived from a levy on motorcycle registrations or licences. Whilst a fund for dedicated motorcycle safety projects would be highly desirable, funding it through a levy would be highly discriminatory for the following reasons.

Motorcyclists already pay registration fees, insurance fees, petrol levies (state and federal, and taxes of various kinds which largely go into general revenue, to be returned as funding for transport and safety initiatives for all road users. To charge an impost on a particular road user group because it requires unique treatment of road surface and infrastructure in some circumstances is to remove the group from what is intended to be an equitably-funded system.

Any special treatment for motorcyclists' requirements for a safer road system would almost invariably benefit all other road user groups, some of which (heavy vehicles) pay a tax for potential road damage, some of which (motorised bicycles) pay nothing, and the

rest of which pay a rate based on power or weight. No such group pays a levy for any special requirements, nor would they contribute to a motorcycle fund that also benefited those other groups.

Generally, to date all road user groups with the exception of motorcyclists have been provided with the most up-to-date infrastructure to improve their safety (with the exception of current trials of road safety barrier systems in SA and Victoria). For example, the installation of the innovative (and infamous) Wire Rope Safety Fence (WRSF) commenced about sixteen years ago on the grounds that it vastly improved the outcome of crashes involving cars and heavy vehicles, notwithstanding that it also vastly increased the perceived death and injury risk for motorcyclists, yet no specialised levy has been imposed upon those road user groups.

Motorcycles are an integral part of the transport system and, from an ecological perspective, compare very favourably with other vehicles due to their small environmental footprint (relatively low manufacturing costs, high fuel efficiency, low emissions) and contribution to a reduction in congestion (travelling and parking). The proposed levy will penalise those who favour motorcycles and discourage this participation.

The argument supporting a levy refers to the benefits produced by the Victorian system (introduced in June 2002, and the only one in Australia) and cites the AMC's acknowledgement (in its submission to the National Road Safety Strategy 2011-2020 draft proposal) that the levy had given Victoria "an edge in addressing motorcycle safety issues" (p.16).

The edge seems to exist. To date in Victoria, 148 motorcycle blackspots have been treated, and an analysis of 85 blackspots has shown a 24% reduction in motorcycle injury crashes at those locations¹. Between 2005 and 2010 there has been an average annual reduction in fatalities of 1.6%². The reduced crash rate in Victoria is claimed to be due to improvements to road infrastructure, road delineation, blackspots, engineering design, rider training and other areas brought about by levy money expenditure in line with recommendations of the Motorcycle Advisory Group.

However, more should not be read into the statement than the AMC intended, for this edge is not be as large as the argument implies. For example, scooter sales in Australia between 2004 and 2008 increased by over 400%³, and scooter and motorcycle registrations between 2001 and 2010 increased by 82%, yet in the latter period the number of fatalities only increased by 17%⁴. This suggests that motorcycle safety is improving nationally, not just in Victoria.

Further, a sizable proportion of the levy garnered from Victorian riders has been spent on administration and research projects, around 80% has been spent on road improvements which benefit all road users, not just motorcyclists, and none to date has been allocated to off-road safety issues despite off-road riders contributing their share of the levy through registrations.

It is clear that employing the Victorian levy as an endorsement for a South Australian one should be treated with some caution.

This is not to say there is no merit in a dedicated fund for motorcycle safety initiatives. Motorcyclists have particular safety requirements with regard to roads and infrastructure which would benefit from a focussed approach, driven in turn by the need to apportion such a fund efficiently and effectively. Given that the wider community would benefit

from measures which improve motorcyclists' safety, it would seem appropriate to provide such funding through the normal annual budgeting process.

Additional points for consideration

Driver Training in Relation to Motorcycle Safety

Motorcycle and scooter riding require specific skills which are not acquired through driving, with the associated potential to compromise one's safety if one has had little or no training or experience. On the other hand, the more familiar all road users are with the functional and behavioural characteristics of motorcycles, the safer riders of such machines will be. A balance between the two is highly desirable. This can be achieved through a training and licensing system which includes at least motorcycle-specific information and, ideally, a practical component.

In short, the more drivers there are who ride, or have some experience on a motorcycle or scooter, the more they will be aware of riders when they drive. In practical terms, not all people would be capable of riding a motorcycle for a multitude of reasons, but it is eminently reasonable to expect all vehicle licensees to have an understanding of motorcycle safety from a theoretical perspective.

Novice Rider Training

The state government's motorcycle rider training scheme, RiderSafe, was introduced in March 1987, after developmental consultation with the MRASA. As it was made compulsory, and full-cost recovery would not have been received well by the motorcycling community, the government subsidised the scheme to make it affordable. In subsequent years the government's policy was reversed and the RiderSafe scheme, at over \$700 (including L and P licences), is now one of the most expensive in Australia. A full driving licence, on the other hand, can be obtained through a number of cost- and skill-related options for as little as \$200.

This acts as a disincentive to many young people of licensing age who would like to purchase a motorcycle as a first vehicle for economic, enjoyment, ease of parking or other reasons. It is also likely that the training cost may be a contributing factor to the number of unlicensed riders (that is, those without an appropriate motorcycle licence) on the road, particularly as this group has an above-average rate of fatal crashes.

It would therefore be reasonable for the State Government to consider either reinstating the RiderSafe training subsidy or allowing private organisations to provide motorcycle training, with the associated prospect of a reduction in fees through commercial competition.

Refresher Rider Training

Some motorcyclists suspend their riding activities after they marry, usually for economic or family transportation reasons, then return to riding after the children have become independent. Many such riders believe 'refresher' training courses to be an invaluable aid to refamiliarising themselves with the skills they had acquired during their earlier experience.

After some experience subsequent to acquiring a full motorcycle licence, many riders seek to enhance their roadcraft skills by participating in training courses that are more advanced than those required to obtain their licence.

The underlying objective of riders taking refresher and advanced training courses is to improve their safety on the road. The benefit for riders as a group is a reduction in risk leading to fewer and less harmful crashes than there might otherwise have been; the benefit to the community is the reduced demand on the public purse for medical treatment.

A government subsidy on refresher and advanced training courses would encourage, and enable, more motorcyclists to expeditiously acquire or reacquire the skills which would otherwise be obtained through more extended experience and which anecdotal and statistical examination indicates would lead to safer participation in the road environment.

Off-Road Motorcycling

At present, all motorcycles which operate on public land in South Australia are required to be registered for on-road use, regardless of whether or not they are to be used exclusively off-road. As such, they are also required to fully comply with the relevant Australian Design Rules. This means that those motorcycles which are used exclusively off-road have components which can either be easily damaged in a fall, such as indicators and mirrors, or can cause harm in a fall, such as headlights and standard-sized numberplates.

Further, the cost of on-road registration and third party insurance is not considered to be directly correlated to the risks associated with off-road riding, particularly as few off-road motorcyclists tend to carry pillion passengers or have crashes with other vehicles.

Currently, there are limited areas in the Adelaide region and further afield the public may go to enjoy off-road motorcycling, or where off-road training may be facilitated, hence these riders are often limited to normal vehicular sealed and unsealed carriageways with their associated traffic-related risks, limited range of terrain appropriate for off-road motorcycles, and limited motorcycle-specific facilities.

From a safety perspective, given the sport's popularity, it would be a progressive step to have places where riders can learn, formally and informally, to handle the diverse conditions. If these riders also have a road bike, or subsequently obtain one, such knowledge would enhance their skill and safety on the bitumen.

Dedicated riding areas, together with a dedicated registration system, are therefore deemed by the riding community to be viable solutions. This has occurred with considerable success in other Australian states.

Improved Data Collection

Often recommendations are made without substantive data. Addressing this void to some degree could be achieved through a motorcycle in-depth crash study with associated data collection and analysis. In 1999-2000 the Association of European Motorcycle Manufacturers (ACEM) initiated a 'Motorcycle Accident In-Depth Study' (MAIDS)⁶ involving 921 motorcyclists in five countries, which identified crash causation

and consequences. MAIDS resulted in significant improvements to motorcycle safety and the initiation of R&D programs for safer road infrastructure.

Motorcycle Road Safety Audit

A safety audit of all roads from a motorcyclist's perspective with the aim of removing or improving all motorcycle-unfriendly road infrastructure would quickly return its cost many times over. Road building and remodelling involves road safety auditors who are trained to identify hazards, potential or existing, at any given location, with the safety of all road users in mind. However, motorcycle safety, if considered, may not be given a high priority when costs and efficiencies are factored into the safety of other groups. An experienced motorcyclist's eye in the auditing process would be of significant benefit.

References

1. *VicRoads motorcycle levy data sheet Jan 2012*
2. *Victoria's Road Safety and Transport Strategic Action Plan for Powered Two Wheelers 2009-2013*
3. *Federal Chamber of Automotive Industries sales data sheet 2009*
4. *National Road Safety Strategy 2011–2020*
5. *SAPOL Expiation Section 2012*
6. *Motorcycle Accident In-depth Study, ACEM, Brussels, 2004*