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| ***International Federation*** ***of Motor-home Clubs     aisbl****EU Transparency Registry Id:*  *281777435616-61*[***https://www.ficm-aisbl.eu***](https://www.ficm-aisbl.eu)***France Dept. / Reg. Nb:***62/W354002273***Brussels Office:  +32 470 70 43 70******clooster-ficm@proximus.be*** |

Brussels, 17 May 2022

The IFMC board welcomes the EC invitation to contribute in this last public consultation on the Revision of DLD 2006/126.

We are grateful to EC Officials for having heard our specific and long standing demand for improving the regulatory fate of B licensees making use of motor-homes (a.o.).

Over the course of various technical and non-technical surveys and workshops, we could understand that other communities had problems similar to ours: a need to increase max GVWR of B licence in order to improve their workload while reducing the cost and admin burdens of C1 licence.

C1 licence creation was a practical idea to allow mid-size vans driving up to 7.5T.
However, this new category proved to be too heterogeneous, mixing professional and private drive in addition to specific vehicle types like emergency, craftmanship’s or agri-vehicles altogether.

By nature, private and professional driving are different worlds in terms of knowledge and practical requirements. Mixing their regulatory regimes reduce any chance to reach the best regulatory regime for each of them.

By working together with other user communities and a handful of governmental agencies, the IFMC devised a way forward in-line with some innovative solutions developed elsewhere in Germany, France and Austria.

We developed our principle gradually through several publications whose references can be found in a special Memorandum we addressed in May 2021 to Commissioner for Mobility and Transport, Her Excellency Adina-Ioana Vàlean.

The purpose of this document was to bring a comprehensive background analysis of B licence GVWR restriction at 3500 Kg as a way forward to comply with new complexities emerging from energy transition, technology push and new heavier vehicles like SUV, e-Vehicles and leisure ones, such as motor-homes (100% Diesel based, 20 year lifetime on average!).

On the other side of the landscape, urban mobility and micro-mobility should be properly articulated with road and rural traffic through renewed public transport policies. A total shake-up is expected for European citizens in view of the 2050 target..., while uncertainty factors gain momentum due to global evolutions.

To summarize, our opinion at IFMC is that both citizens and legislators ask for clear rules to be devised in order to make them easily applicable and enforceable. Clarity, flexibility and applicability are key points for people minimal acceptance.

Meanwhile, it is normal that specific demands and derogations take place within negotiations, although they usually tend to add complexity and reduce the scope of interoperability (not only between Member States but also with respect to non-EU countries, a need this UNECE document[[1]](#footnote-2) proves to be crucial). This remark remains conform to the EU principle of subsidiarity.

Therefore, our proposal aims to take all M1 vehicles (private cars up to 3.5T and motor-homes with maximum 8 passengers) under B licence regime, whatever their weight (we mean “technical weight limit”, according to *adhoc* type-approval document). N1 vehicles would remain under C1 regime.

Within this new B-type licence, vehicle **weight** and **length** could be used as a double key to allow gradual access to driving rights, by sub-typing B-licence just as we did at A-licence level for motorcyclists.

This new regulation should be subject to adjustment in the next 15 years or so, depending on progress in terms of energy transition, infrastructure and technological advance (including autonomous cars and minibuses having max 9 seats).

At IFMC, we see this proposal as a way to combine immediate action and long-term view.

**Scaling access to B licence could be seen as summarized below:**

**B1 sub-type:**  Small MH up to 4.5T are based on small Van powertrain
(70% of MH are limited to 3.5T or less, on FIAT Ducato;
4.5T powertrains offer Mercedes or IVECO with propulsion instead of traction)
remember that the external dimensions of 3.5T and 4.5T MH are identical

B1 should be designed so as to allow retro-fitting of the existing fleet by add-on equipment or HVO-type energy.

**B2 sub-type:**  Mid-size MH up to 7.5T are based on mid-size Van powertrains (Mercedes, IVECO, MAN, Renault)
B2 should allow add-ons like batteries and Hybrid Diesel with e-mode.

**B3 sub-type:**  Larger MH beyond 7.5T rely on small truck powertrains
B3 should allow early hydrogen based e-power on the high-end market segment

**Training and Testing**

Training and testing could be eased using on-line applications before going to test centers, for certification.

Going beyond 3.5T could be subject to specific tutorial (workload repartition, kinetic aspects, stability).

In case GVWR is higher 4.5T or vehicle length is higher than 7 meters, practical test on parking would be highly recommended. Such tests should be conducted using own vehicle. Initial failure should open second and third chance to pass over a limited period of time.

Final score should be mentioned on license proof, limiting the effective right to drive, with mutual recognition between Member States.

While awareness on ADAS[[2]](#footnote-3) and navigation technologies makes sense for anyone, lifelong learning should not become another obsession to invade people life: the more we go towards autonomous vehicles, the less training should be required, leaving technology as a “magic” help instead of a boring constraint. A simple ADAS token, after proper simulation session, should be enough at certification level to go on year after year, unless specific voluntary decision of the licensee himself. Insurance companies could help the process.

Likely generation gaps would be filled smoothly thanks to new ways to live and to consume high-tech.
Youth will lead the way.

ADAS embedded electronics should also gain relevance through self-learning adjustment capabilities, fault tolerance and anthropomorphic design. An objective industry is actively pursuing.

 **Medical Checks**

Finally, medical checks should be in charge of General Practitioners, instead of Road / Health or Labor Administrations, removing current hurdles, obstacles and burdens (as promised by the Sept. 2019 ex-post Roadmap Consultation on DLD 2006/126).

The IFMC Memorandum on the Revision of Directive 2006/126/EU on Drive Licence Regulations was sent in May 2021 to Her Excellency Dame Adina-Ioana Vàlean, Commissioner for Transport and Mobility, under embargo.

We have the pleasure to release it today, for transparent and public audience.

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| Claude GUETIFMC President |  |

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| ***International Federation*** ***of Motor-home Clubs     aisbl****EU Transparency Registry Id:*  *281777435616-61*[***https://www.ficm-aisbl.eu***](https://www.ficm-aisbl.eu)***France Dept. / Reg. Nb:***62/W354002273***Brussels Office:  +32 470 70 43 70******clooster-ficm@proximus.be*** | European Commission Attention of Her Excellency, Madam Adina-Ioana VáleanCommissioner for TRANSPORT & MOBILITYRue de la Loi, 2001049  Brussels |

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| Brussels, 25 May 2021, |  |

Concern:     Revision of Directive 2006/126/EU/ dated 20 December 2003 on Drive Licence 2021 Q2

                    Memorandum on the issue of GVWR\* under the B licence regime

                                                                                                              \* Gross Vehicle Weight Restriction

Her Excellency, Madam Commissioner,

I write to you on behalf of the International Federation of Motor-home Clubs of which I am the President.

I wish to draw your attention on the document in attachment which could perhaps be relevant for future decision making in the domain of B licence regulation.

The attached document is a **memorandum of real actuality** since the latest public consultation organized by your Services, just closed on May 21st.

As you are probably aware, over 2200 contributions were received, with a majority coming from citizens (over 93% of them).

Compared to the Ex-post Roadmap consultation for the Evaluation of Directive 2006/126/EU (closed in September 2019), this makes a significant difference.

Only ONE citizen had contributed in 2019 out of 23 contributors, of which 3 made recommendations to raise the Gross Vehicle Weight Restriction of the B licence from 3500 kg to 4250 kg:

* + the German ADAC (ref. [F473270](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11930-Driving-licence-legislation-ex-post-evaluation/F473270))
	+ the Austrian ÖAMTC (ref. and [F473292](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11930-Driving-licence-legislation-ex-post-evaluation/F473292))
	+ the ECF (European Caravan and autocaravan Federation), which unite manufacturers (ref. [F473227](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11930-Driving-licence-legislation-ex-post-evaluation/F473227) )

Our Federation was admitted in the Transparent Register in August 2019, and we tried to understand the case of PVWR increase for the B licence.

We started to tackle the problem from **a technological standpoint** and we submitted our view to DG Grow by June 2020, with a contribution to their consultation on future Euro 7 norms (réf. [F521860](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12313-Normes-europeennes-en-matiere-d%E2%80%99emissions-des-vehicules-Euro-7-pour-les-voitures-les-camionnettes-les-camions-et-les-autobus/F521860_fr)).

On the DG Move side, we took part in interviews, questionnaires, and public consultations, where we could express our views.

However, we decided not to contribute to the latest consultation that closed last Friday 21 May 2021.

We noticed a vast majority of citizens requiring the upgrade of GVWR.
We realized very quickly that they were saying **WHY** they wanted the upgrade.

We are of the opinion at IFMC that **WHY** is more important than **WHAT**.

Many user-driven organizations followed on the same tone, some of them being very important.

Our Federation like many other actors in the motor-home community is working very hard since many years to have the GVWR rule changed.

Motor-home adepts don't understand in general the reason why it seems to them they are not listened to.

The answer is that they need to express their concern first, along the right procedures and facilities offered by the Union.

Motor-homing is influencing the Drive Licence since many years already, very gradually and we all admit that progress is obvious.

It happens exactly the same way as for the small camping trailers in the Geneva Convention of 1949: they were recognized!

On our side, we tried to find facts, the origin of users and Legislator current concerns and point to what might be a simple misunderstanding.

Several governments helped us, because several of them challenged this EU measure rigorously, from the start.

Our memorandum takes into account the contributions made at the public consultation that closed by May 21/05/2021.

It provides a comprehensive approach to the tension between the demand of motor-home users and the legal framework.

By trying to highlight the respective constraints of each side of the game, its objective is to reconcile the points of view and help the EU Legislator to focus on the best compromise while explaining it.

However, after much discussion with the author, we decided it is too sensitive a document and too early to be made public.

I wish you a nice discovery.

In the meantime,

I remain,



Claude GUET

IFMC / FICM President

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| ***International Federation of Motorhome Clubs******F.I.C.M. aisbl - IFMC npmioReg. : n° W354002273 - Pas de Calais (F)******Siège social / Secrétariat Général :*** ***8, rue de la Croix de Grès*** ***62000 Arras*** [***https://www.ficm-aisbl.eu/en/***](https://www.ficm-aisbl.eu/en/)*EU Transparency Registry Id :* *281777435616-61****Brussels Officerue de Godeupont 28******B-1450 Chastre - Belgium******Mob: +32 470 70 43 70******e-mail: clooster.ficm@proximus.be******https://www.ficm-aisbl.eu*** |  |

**Consultation on the**

**Revision of Directive 2006/126/EU on Drive Licence - 2021 Q2**

***Memorandum to Her Excellency, Madam Adina-Ioana Válean,***

***Commissioner for Transport & Mobility***

***on the issue of GVWR[[3]](#footnote-4) under the B licence regime***

*This document takes into account the contributions made at the public consultation that closed by May 21/05/2021.*

*It provides a comprehensive approach to the tension between the demand of motor-home users and the legal framework.*

*A new perspective allows to understand the origin of concerns and to explain a misunderstanding.*

*By trying to highlight the respective constraints of each side of the game, its objective is to reconcile the points of view and help the EU Legislator to focus on the best compromise while explaining it.*

*Date of the document: 23/05/2021 Author: Marcel J. Ch. Vanden Clooster
 Brussels Office: +32 470 70 43 70*

# The IFMC, as the 45 year old motor-home user clubs umbrella association (including UK), welcomes the intention of the European Commission to improve once more our regulations on Drive Licences through a major revision.

# Introduction*The IFMC is here as a consumer association to represent over 50 regional motor-home clubs in Europe and our aim is to explain properly the requirements of their users. All of us are volunteers, having no overhead or commercial links. We took part in earlier discussions with the European Commission together with about 55 delegates from Government bodies.*

# *We explained our case and we are keeping in touch with several of them from which we receive strong support. We oppose some Member State’s decisions both locally and at EC level. Locally, we use to have strong and fair cooperation with municipalities.*

# The current consultation for evaluating Directive 2006/126/EU represents an important milestone for the European legislation on Drive Licences, which was inaugurated by Directive 1980/1269/EEC, at the time “Europe” was a pure European Economic Community, and not yet a Union.

# That Directive was directly drawn from the Vienna UNECE Convention of 1968, which was itself expanding the Geneva Convention of 1949. And we will go further.

# A brochure published by UNECE highlights the difficulty for foreign countries to recognize European Drive Licences: “[International Permit Categories](https://unece.org/DAM/trans/main/wp1/wp1doc/International_Driving_Permit_Categories.pdf)”. It recommends reconciliations of the differences between the International Driving Permit categories in the 1968 Convention on Road Traffic and the corresponding definition for the same symbol in the EU Driving Licence Directive (2006/126/EC of 20 December 2006).

# This document is presented as a pedagogical document to help national administrations in the recognition of new European residents’ rights in terms of drive licence. In reality, it just highlights the complexity of the task!

# We are here to help defining the content, the extent of change and new regulation to be included in the Revision Package to be proposed by mid-2021 to the Board of the Commissioners themselves.

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| This should normally lead us to **the 4th major upgrade of EU legislation** in this specific domain, by the end of 2022.This consultation which is just abou**t** to close shows over 2200 contributions **we will try to summarize under point C below.**It was designed to comply with the **Sustainable and Smart Mobility Strategy**, adopted on 9 December 2020, which confirms the full commitment of the Commission to deliver on the ambitious goals **on road safety** for the Union established in the policy framework of 2018. The revision of the Directive on driving licences is included in its action plan as one of the key actions in this area (Ref. Inception Impact Assessment). Before all, we give a short and quick review under point A of the successive reforms since 40 years.A. Remember the main DirectivesThe main Directives that were approved by the European Parliament and unanimously by the Member States at European Council level will help clarifying both ambitions and achievements of the European Union in this specific field.- [91/439/EEC](https://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=CELEX:31991L0439&from=FR) Known as 3th Directive on Drive Licence (REFORM)  approximately 200 million permits to be managed creation of subcategories A1, B1, B+E, C+E, C1, D+E, C1+E, D1+E[- 97/26/EC](https://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=CELEX:31997L0026&from=EN) introduction of harmonised European codes: 01 to 79, including 76 (C1+ trailer > 750kg, with combined mass <12000kg and trailer mass < towing vehicle) - 80/1263/EEC comes into force.- 2003/59/EU harmonisation of driving licence formats and validity periods while preserving vested rights: at that time, 120 different formats coexist in Europe. Professional driving, periodic testing and training.- [2006/126/EU](https://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=CELEX:31997L0026&from=EN) Know as 3rd Directive on Drive Licence (REFORM) Recast of the driving licence provisions from Directive 91/439/EC. The option of imposing national provisions on the duration of validity resulted in more than 110 different models, a situation that is unmanageable from the point of view of mutual recognition of licences; creation of two subcategories for mopeds and motorbikes ;gradual replacement of paper licences by the plastic card with a microprocessor. We find in art. 4, § 4, *alinea* 4b that the B licence is open:to car of which GVWR is not higher than 3500kg or to a car towing a trailer not heavier than 750kg, providing that the combined mass is not higher than 4250kg.- [2018/645/EU](https://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=CELEX:31997L0026&from=EN) approximately 300 million permits to be managed; access to the profession of examiner; and periodic examination of professional drivers; continuous training in new technologies; and especially recitals 18 and 19: dealing with suggestion to raise GVWR of B licence up to 4.25T, providing the extra weight be dedicated to equipment using alternate energies.Furthermore, an important milestone for motor-home users is offered by Directive 2001/116/EC defining vehicle types and special vehicles: motor-homes are appropriate vehicles to live in, with bedding, table and so on. Unfortunately, B licence is still limited at 3.5T, which is a strong impediment for families to travel.In total, 40 years of systematic build up created the basic conditions to safer roads, more secure vehicles and drivers more apt for driving. Commercial vehicles have received special treatment, professional drivers have received more care with limited period at the wheel and safer parking places to rest, night and day.**B. Preliminary remarks** Discussions on the B licence regime for motor-home users often derail on ontological concerns.A real confrontation comes at the intersection between three separate domains of knowledge:traffic security, road safety technological reliability.The binding concept for these three worlds is acronymised as GVWR[[4]](#footnote-5), which is fixed at 3500kg since over 60 years by the UNECE Convention from 1968, triggering a specific remark from the ÖAMTC contributor in Drive Licence Roadmap consultation of Sept. 2019([[5]](#footnote-6)). The reality is that it is even older than that: the XVIIth Century!Traffic Security requires road signs to be defined and respected, whatever vehicle category. Road Safety requires drivers being able to accomplish the various tasks involved by driving, including skill checks.Technological reliability leads to type-approval rules. Closer to their customers, insurance companies try to solve abnormal interactions between these different worlds.Keeping long-term coherence between each regulatory sphere is a real challenge of our time since complexity in each of them increased dramatically over the recent decades through pressure from change in traffic flows, technology and ways of life.Pioneer’s time is now over and motor-homing is not emerging a phenomenon anymore. They are 2 millions on our European roads and still unknown by official traffic statistics (except in Germany) and more comfortable than ever, entirely M1 typed and fit to park as an ordinary car while based on simple N1 city-vans. They became also heavier, at no surprise, and the GVWR issue has become for motor-home users the final intersection point between over-inflated regulations and reality, in total wording confusion.So, whatever happens and without any over-optimistic hope into the final result of this experience, we must be careful to warn people that, should they opt for a motor-home GVWR greater than 3500kg, they will have to keep anyway respecting C21 3.5T road signs and speed restrictions on the roads. This will prevent them from cracking a bridge here of being traced and pursued over there by law enforcement agents while going through a village. The same way, a higher GVWR for any motor-home will be anyway restricted to the technically approved limit by manufacturers and authorities.Having the issue properly in mind for the only question ordinary people ask, we are ready to start digging gradually into more complex reasoning and sophistication. |

# C. Overview of the consultation

# Compared to the 23 contributions we had in September 2019 to open the Roadmap exercise, it makes a significant progress. We had just one citizen at the time and we have now about 95% of citizens. Is it still a progress?

# It’s really hard to say, because you have to compare with the question. What were we asked for? What do people ask for?

# Can we match both positions?

# In order to find ways to tackle the issue, we should start by a summary of the decision status (Section D).

# Secondly, we should set the current exercise into the broader perspective of the global context of the European Drive Licence legislation: what crucial steps have been achieved for what results? See Section A above.

# Finally, we should try identifying key articulation points that could be taken to combine direct action and long-term objectives. GVWR values like 3500kg, 750kg and 4250kg are repetitively confirmed in spite of complains we make since the 1980/1269/EU directive came into force, in 1997.

# When found critical, these articulation points should be investigated in order to relieve any fear and objection from the Legislator, at final stage. They should be taken within a kind of joint mental model[[6]](#footnote-7) by both DG Move and DG Grow on one side, the Parliament and the Council on the other side. This should not be a dream, but a reality. It’s good management practice for Reliance, Recovery and Re-Deployment in the current circumstances.

# We will explain our methodology, our findings and our proposal (Section G).

# The issue for increasing the B licence GVWR beyond 3.5T remains a challenge since 25 years, as it had to come into force.

# We will try to show how simple the problem is and how complex it has become to solve using the available expertise.

#  However, we are so close to a solution that it seems for the very first time we have a chance to overcome resistance and allow B GVWR to be raised. The IFMC requires GVWR to be raised at 4.5T, and we justify it by restrictions expressed by the Commission in its first attempt to break the barrier. It was in whereas (19) of Directive 2018/645/EU). Unfortunately, the Legislator did not follow. Why so? We shall try to understand.

# We should also decide on what is more important in the requests we have seen?

# What they ask?

# Or why they ask?

# Should we be interested in end user and citizen satisfaction, no doubt we should pay attention to their demand and put it in perspective with a rule of law that became slowly outdated regarding technological advance.

# This is the thematic we shall try to analyse step by step in the following sections.

# So, let’s come back first to the objectives of this consultation and to the latest signal we had from the Parliament.

# In order to make it clear for the reader, we present here the successive sections with their related objective.

#

# The IFMC Analysisa Global Approach

# Table of content

|  |  |
| --- | --- |
| Topics | Page number |
| D. Towards new regulations - Status in decision makingOur methodologyF. Extract from the IFMC ArchivesG. Final propositions by the IFMC on the 3.5T issueH. History speaks by itselfI. GVWR as a symbolConclusions | 10121320202223 |

# D. Towards new regulations - Status in decision making

# Remember Objectives, as defined on the Inception Impact Assessment Report (introductory document)

# fast move towards zero-emission mobility : \* EU’s goal of at least -55% greenhouse gas reduction target by 2030

# \* climate neutrality by 2050

# ZERO death by 2050, with mid-term target of 50% reduction in deaths and serious injuries by 2030

# Take advantage of new technologies for driver training and smart moving (help reduce dangerous behaviour)

# Take advantage of certain shortcomings as well as the need for evolutions in accordance with the societal and technological developments since 2006 and also in view of the Green transition.

# Remove excessive burdens (both administrative and financial)

# As viewed by the Parliament

# Over the last plenary session of 25 April, the Transport & Tourism Committee formerly chaired by MEP Benoît Lütgen, gave a 48 votes in favor and 1 against the proposal of the Commission related to a so-called Roadworthiness package.

# The idea of the Commission is namely to try improving Roadworthiness by setting all motor vehicule types on equal foot: every vehicle, whatever its type should be constrained at periodic technical inspection (PTI). However, it is interesting to note that Benoît Lütgen, who chaired this committee in the previous legislature, had made reservations about motorbikes and scooters under 125 cc. At present, the rapporteur-designate, the Romanian MEP Marian-Jean Marinescu, made some additional comment, requiring the Commission to hold further consultations in order to evaluate the cost/benefit ratio of such an extension.

# On the user’s side

# Professional Transport express concern for giving young people appropriate training and make the driving profession more attractive. In this respect, the Commission should consider the establishment of a European strategy and fund for vocational training in road transport. According to the Spanish federation, those measures will help to align the professional transport sector with the new socio-economic circumstances (employment, productivity and economic performance) while helping road transport companies to improve their competitiveness with well-trained professional drivers. We will come back on this. Others ask for the basic D licence to allow carrying up to 20 passengers instead of 16, and they mention the need to cover school shuttle requirements. 16 seats is indeed too short for a single class room to be moved to the swimming pool and return, and current small busses are more convenient and less expensive in town than a small coach. Licence duties are lower too, making it easier to find drivers.

# On private usage, we haven’t seen any specific request from ordinary car users, but established bodies into Road Security like ETSC play their traditional role, in very general terms. OTI, the Finnish Crash Data Institute, gives an interesting view on casualties resulting from dangerous behavior, living practices and recidivism that could be considered elsewhere. They FIA adds to its latest position paper (traditionally well inspired by technological change and their likely impact) the unusual mention to recommend not to adjust periodic test to ageing conditions, in order to protect eldest people mobility and their autonomy modern life requires (remote super-markets, remote family, sociability, a.o.). Finally, private users of ordinary cars don’t express any specific concern, but motor-cyclist come up-front. Motorcycle clubs and associations express their fury, arguing that motorcyclists are particularly concerned about the technical condition of their vehicles because their lives immediately depend on it. We also recognise in the received contributions the same demand from the Swedish Motorcycle Federation. The fate of motorbikes and scooters of less than 125cc would be definitely sealed by the end of 2022 as latest. On their side, motor-home users obviously don’t understand why it is not possible to drive a 4,25T motor-home with a B licence but it is possible to drive a 3,5T motor-home with a 0,75T trailer. What is the rationale of such a paradox?

# The IFMC general position: Focus on the need to succeed The IFMC considers as a general advice to focus on the need to succeed in this ambitious 2050 challenge! Moving from carbon-based propulsion to CO2-free energy will be a tremendously complex adventure with clean air for populations remaining an issue. Transition must be supported by reliable data and reporting. More must be done to capture available data on vehicles at Periodic Technical Inspection time, including non-exhaust emissions (tires, brakes, clutch) and as soon as possible OBM[[7]](#footnote-8) data over lifetime of vehicles. Interoperability of data exchange will be crucial between Member States, which will require further standardization of the procedures and management rules. Reporting should be made with a realistic balance between what are already available data and what should be available in the coming years, in order to bar in due time vehicles which fall out of the limits. Provision should be taken to conform to Private Data Protection Regulations. Additional global estimates from mobility should be shown up rapidly within the current evaluation exercise and taken individually on board as from 2030 with yearly collection and reporting at inspection time, giving time for industry to adjust their investment, the qualification of their workforce and for customers the right warning they need. This should be done with respect to a fundamental Green Deal assumption: not only just, but in inclusive a way. To quote Madam President Ursula von der Leyen in her Dec. 2019 statement: “No one should be left behind!” This statement is basically what we proposed to DG Grow over their June 2020 Consultation on the future of the new Euro 7 norms for cars, vans, lorries and busses ([F521860, 03 June 2020](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12313-Normes-europeennes-en-matiere-d%E2%80%99emissions-des-vehicules-Euro-7-pour-les-voitures-les-camionnettes-les-camions-et-les-autobus/F521860_fr)).

# As we said before, the IFMC requires as from September 2019 a GVWR for B licence to be raised up to 4.5T.Our proposal to address the 3.5T issue is presented under section G below.

# Back to regulations

# In its preparation of Directive 2018/645/EU, the Commission had suggested that *“Member States should be given the possibility to allow, in their territory, holders of a category B driving licence to drive certain types of alternatively fuelled vehicles of which the maximum authorised mass is greater than 3 500 kg but does not exceed 4 250 kg. That possibility to exceed 3 500 kg should be conditional upon the additional mass allowed being exclusively due to the excess of mass resulting from the alternative propulsion systems and should be subject to limitations and conditions intended to avoid negative effects on road safety.”*

# The IFMC cannot agree with this EC proposal. Motor-home fleet is nearly 100% Diesel propelled and there is no technological proposal today that could satisfy the motor-home industry. They buy unfinished vans from carmakers and they furbish them according to specific niche market definitions.They produce many different models in small quantities, very often less than 500 vehicles. Diesel was initially selected for the higher torque it allows, using a smaller engine. We need it to pass mountains with full load. There is little chance that hybrid solutions would emerge soon for Diesel, requiring extra technologies and equipment to be embarked. Retrofit actors could propose *adhoc* solutions, but the problem would come on how and when weight check would happen and what criteria would be retained to approve such individual equipments. It seems unlikely to be feasible, given that we should first define what is considered as alternate energy equipment. Are solar panels included? What about extra batteries? They help being autonomous. Furthermore, motor-home equipment evolves over its lifetime.

# Therefore, we ask the Commission to remove the conditionality regarding alternate energies. It’s a 10 to 20 years time before we will have other solutions under 3.5T constraint.

# Were the Commission confirm the conditionality, then we would end up asking for only 250 kg of additional payload.

# This would not be to have heavier motor-homes on the road.

# The primary objective is to relieve 85% of motor-home adept citizens from the fear to be outlaws.

# Where is the problem? This is also what the ECF was suggesting in 2019: 4.5T since those vehicles are identical in size to the 3.5T models.

# Because of technological circumstances, the motor-home industry relies at motor-home level on short-term business.

# This is very bad for them because the world is changing everywhere at every level.

# The more Diesel they sale, the more difficult it will be to address the Green Deal objectives of the European Union.

# Giving more flexibility would allow them to innovate with new tech and new design. This is a crucial for this industry.

# Let’s remember that the US regulations on Drive Licence allow a basic licencee driving a 8 T Recreational Vehicle without any penalty. As a consequence, the US RV industry will continue to flourish and adjust their low-end models to hybrid and new energy propulsion. The US never ratified the Vienna Convention of 1968, and UK did it after much resistance on 28 March 2018 in order to anticipate the consequences of Brexit: the risk was that all their lorries could be banned from the European roads.

# It must now be pointed that increasing GVWR would allow manufacturers to implement more security like electric and energy recovery brakes with additional batteries, stronger chassis, ISOFIX child seat attachments and useful equipment like pneumatic suspension or telescopic stabilizers bringing important support to the physical and health condition of motor-home travelers: better nights bring better physical condition on the road. So, more safety for everybody! Motor-homes should be able to welcome larger families having 3 or 4 children of which the weight is lower than 75 kg, together with their luggage, bikes, all their clothes and games.

# Our methodology

As we mentioned in our introduction, we had discussions and contacts at a public conference with EC officials and governmental bodies.

With so many years in negotiation, the further we went into the matter, the clearer solutions were appearing to us. We started to devise ***an ad hoc typology*** of the motor-home landscape as below:

1. **Small motor-homes up to 4.5T**, since 3.5T and 4.5T have same format and technology:
They represent + 85% of registered vehicles. Power-trains are “small” city vans.
2. **Mid-size motor-homes up to 7.5T** (currently under C1 licence regime).
They represent 13-14% of registered vehicles. Power-trains are “heavy” city vans.
3. **Larger motor-home beyond 7.5T** (C level, but for private use). Power-trains are “small” trucks.

They are all M-type vehicles. We require B licencees being allowed to drive small motor-homes.

**Oversized burden on people**

* technically unjustified [road checks and penalties](https://www.promobil.de/tipp/ueberladung-gewicht-wohnmobil-strafen/) (click to see Member States rules!).
Such penalties are disproportionate for private and craftsman vans. Their weight changes over the day and overload is marginal (water and diesel tank consumption for the former, varying equipment and material for the latter). The situation of private and craftsman vans is NOT to be compared with haulage trucks' travelling one or several days across the country and borders.
* type-approval discrepancies between Member States, reducing Internal Market efficiency;
furthermore, approvals happen usually **before** any customer equipment is installed; equipment keep growing over time, as for a house.
* The cost of C1 licence is much too high (+ 2000 €) and unjustified periodic tests and medical check burdens every 5 year or less.

For motor-homes that travel so few kilometers / year for leisure, this is not acceptable.
As a consequence, very few people who know they drive overload do agree to take C1 licence.
About 85% of motor-homes risk overload and insurance problems, which is really insane a situation.

* C1 licence structure being too heterogeneous, mixing commercial and private vans, special vehicles and large city vans up to 7.5T.

Because of drive and medical checks with fuzzy exceptions, Member States don’t resist limiting the exceptions, requiring new B licence application when C1 or C licence comes to end.

After so harsh critics, restructuring B and C1private licences became more and more un-escapable a task.

The October confrontation with stakeholders in 2020 highlighted the fact that other users communities were demanding B licence GVWR to be upgraded:  firemen, craftsmanship and SME’s whose vehicle don’t weigh the same over a single working day, and also Parcel Delivery Services in suburban areas, where independent C1 drivers are hard to find and easy to lose.

But not everybody in the room agreed with our demand.
It was indeed vehemently rebuffed by a specific delegate from an important Member State[[8]](#footnote-9) who was by chance a Vice-President of UNECE Group I in Geneva, in charge of Road Security. “Member States did not agree”, did he say, adding immediately: “There will be no way back!” This was for us a confirmation that the GVWR problem needed to be presented and defended at UNECE level in due course, by the EU itself using its proactive Green Deal stance and 2050 target.

Perhaps could we ask institutions like the European Law Institute in Vienna (or similar) to investigate this question?

Anyway, we came to the conclusion that it would be worth finding a common approach to the 3.5T problem to make easier a common sort of solution. As soon as possible!

Key information came from the German legislation of June 2011 dealing with B licence for “**Small” and** “**Large” emergency vehicles** (click here: [*Vollzugshinweise zum sog. Feuerwehrfürrerschein », 19. Juli 2011 (GVB 2011, S.342) - Gebrauch gemacht*](https://www.stmi.bayern.de/assets/stmi/sus/feuerwehr/id1_12_03_02_vollzugshinweise_fahrberechtigung_20110906.pdf)).

The German legislation creates 2 B licence subtypes providing 4.75T or 7.5T GVWR for emergency vehicles. We checked the situation in Belgium and France and we found that efforts were made several times over the years to raise GVWR at national level, but each failed in turn. Their focus was **on volunteers and heavy ambulances for Emergency Services**. This specific usage was verified quite recently in London.

After a few weeks of hard thinking, we found that firefighters could be interested by the idea.
Our German colleague from Reisemobil Union had a souvenir of some legislation especially designed for German firefighters. We found it and we analysed their solution.
We then decided to call on firefighters and we submitted the idea to the **Fire Brigade Brussels.**

They found our proposal quite relevant because admin costs to manage C1 licences of their volunteers would be reduced.
We wrote a **Common Position Paper** on “common concerns for own reasons” and we decided to share it with firefighters from our 27 countries + 3 others. The Haulage industry received a copy for their Parcel Delivery branch.
The feedback we received were very interesting, also from governmental bodies, giving new ideas.
We learned a handful of countries have already a solution and we started comparing, modeling a new proposal.

**Something was puzzling: where do these magic weights like 3500kg, 750kg and 4250kg come from?**

And we started digging. The answer is to be found under section H.

**F. Extract from the IFMC Archives

“Common Position Paper of Firefighter Brigades in Europe and the IFMC”**

The two next documents come from our archives, next page.

This section Section G will present our the IFMC final proposition to proceed for changing B et C1 licence types.

Section H suggest some of the reasons that might explain the fact that both the Commission and the Legislator seem until now uncomfortable with such a change in the Drive Licence Regulations

**Document n°1**

THIS LIST CONTAINS FIRE BRIGADE ADDRESSES OF COUNTRIES + NORWAY + UK (LONDON and EDINBURGH)

**Improving flexibility of Drive Licence Directive for Volunteers and Cross-border emergency operations**

Dear colleagues,

This New Year message to inform you that a final consultation on the future of the Drive Licence Directive 2003/126/EC is running with **deadline Jan 20th, 2021**.

We have decided to propose a **Common Position Paper** in order to improve flexibility on B and C1 licences by raising the allowed GPWR of B licence from **3.5T** up to **4.75T** for emergency staff. We join a similar demand from the International Federation of Motor-home Clubs (IFMC/FICM) which opened this technical debate for similar concern with own reasons.

Raising our B licence up to 4.75T would align us on the German legislation (see ***Vollzugshinweise zum sog. „[Feuerwehrführerschein](https://www.stmi.bayern.de/assets/stmi/sus/feuerwehr/id1_12_03_02_vollzugshinweise_fahrberechtigung_20110906.pdf)“, Bundestag: National Strassenverkehrsordnung 23 June 2011***).

Please find in attachment the Common Position Paper we have prepared in order to convince the European Commission to move ahead on the issue.

Decision is expected by 2021 fall, or early in 2022 depending on legislative process load.

Don't hesitate to subscribe by returning this mail with mention of :

* your specific Emergency Group name and City/Country
* detailed contact person for follow-up (name, phone number, and e-mail address, website).

Any remark is welcome and will be considered at EC submission.

For practical reasons, we ask you to react by **Monday 18 Jan., 06:00 PM**.

No reminder will be sent to you.

We thank you for your attention.

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 **Document n°2**

**This document follows the confrontation of stakeholder’s viewpoints**

**at EC DG MOVE-C2 Webinar of October 16, 2020.**

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**Common Position Paper**

**Objectives**

Removing unjustified burdens on driving licenses B and C1 according to principles set out by EC Roadmap.
Focus on users or citizens of specific vehicle categories like leisure and emergency vehicles.
Concern is to keep more flexibility in their operations, being private or professional.

Any change should cope with increasing demand for alternate energy equipment as outlined in above mentioned Roadmap, including related policy areas such as the internal market legislation on the type-approval of motor vehicles, under the responsibility of DG GROW (Roadmap’s Purpose and Scope Section).

Both sides are demanding less pointless burden and fresh water tanks as needed. Going to electric propulsion yield to new implications.

The vehicles concerned are "small" or "large" vans with a variety of formulas depending on the missions for which they are intended. Both categories require B-type GVWR to be substantially raised for reasons explained below.

**Worth to remember**

The EC Evaluation Roadmap points Directive 80/1980/EEC to remind us the start point defining the fate of Category B licence used for ***motor vehicles of maximum GVWR of 3.5T used to carry passengers, with maximum eight seats in addition to the driver's seat***”. This legislation is 40 years old!

We try in the next pages to summarise the current situation of specific types of vehicles and users before explaining what type of reform we require.
We are aware that other stakeholders at the Webinar had similar preoccupations, namely in parcel delivery market, where hiring C1 or C drivers is difficult.

1. **Emergency vehicles**
	1. **Current situation**
	 ***Emergency vehicles are used by Fire Brigades, Emergency Services from several types of organisations like hospitals, Red Cross, Civil Volunteer Action, large companies and plants like Seveso Plants.***

Fire Brigades in large cities are professionally trained with stable staff.
But there are in each Member State networks of hundreds or thousands of smaller inter-related brigades in mid-size cities or villages using volunteers. This represents a significant problem on human resource and management issues. Being able to keep skills up-to-date requires constant attention and care to staff. Recruiting volunteers isn’t so easy. The need to deal constantly with the **drive license burden** is a real problem due to the unavoidable turnover, passing unduly before security checks and technical or physical training.

Organisations like hospitals, Red Cross, Civil Volunteer Action, any approved establishment or company run smaller teams, and frequently use volunteers as well.

Although the current Covid-19 pandemic is exceptionally serious, the emergency community lives hard time where every minute counts more than ever. Brigades must be able to rely on their sisters and the network endures maximum stress, even in cross-border mode.

In Germany, the pandemic peak they live lead to ultimate decisions we should better avoid elsewhere.

However did the German authority all they could to cope in advance with emergency situations for what concerns the administrative management of their drive licencees. German Legislator changed the law by defining two new categories of vehicles in order to allow more flexibility into operations.

A new law was adopted by the Bundestag on 23 June 2011:

1. Creation of new B types for emergency vehicles so-called “small” up to 4.75T and “large” up to 7.5T for “large” vehicles.
2. Allowing approved emergency organisations to set up specific training programs for volunteers using their own resource (well trained staff or instructor), cooperative structures or existing *Land* based training structures.
3. to open the “large” licence with 6 training units of 45’, as a minimum.

Those measures where endorsed as from 19 July 2011 by the Bayerisch Government and followed by the remaining 15 Ländern.

* 1. **Our request**

The emergency community asks the European Union to raise the B licence restriction for European emergency staff and volunteers by allowing:

1. *the creation two B subtypes allowing* ***4.75T*** *for* ***“small”*** *vehicles and* ***7.5T*** *for* ***“large”*** *vehicles****;***
2. *approved emergency bodies to manage directly training sessions for their staff and volunteers using their own resource (well trained staff or instructor), cooperative structures or existing official based training structures;*
3. *“****large****” licence with 6 training units of 45’, as a minimum.*

**Leisure Vehicles**

* 1. **Current situation**
	2. Leisure vehicles designed as motor-homes are based on van power-trains currently type-approved for 85% at 3.5T **because** **of the Driving License restriction for B-license at 3.5T**. “Small” motor-homes don’t exceed 4.5T and are exactly the same size as 3.5T ones.
	Mid-size are up to 7.5T.
	3. Most motor-home industries target their cars to B-licencees, which are a majority.
	4. Motor-homes are generally approved by vendor staff **before** any option are installed.
	5. Increasing demand in security features and EU policy actions for energy saving have cost heavier technologies being implemented resulting in less payload available.
	6. The need for industry to compete with additional electronic equipment and comfortable rooms and interiors lead to unsustainable situations where motor-home users are now faced with massive GVWR infringements and on-the-road sanctions about which future owners are misinformed by vendors. Either they comply with a C1 licence or they reject the idea and take the risk. Most of them take the risk, because they contest the need for C1, which to all seems to be pointless and technically unjustified legal burden. Europe is generally blamed therefore. Police regrets to inflict disproportionate penalties to families.
	7. By letting motor-homes be approved in Luxemburg, vendors might even bypass obstacles to sales by delivering motor-homes with as less as 20 L of fresh water in tank instead of 100 or 120 L and 4 seats on road instead of 3 elsewhere. Such vehicles are systematically downgraded at next periodical control from 4 to 3 seats.
	8. The motor-home industry delivers identical vehicles either under 3.5T or 4.5T on customer choice, with identical size and technology. Most customers chose 3.5T for they want to avoid C1 license costs (about 2000 €) and the burden of periodic renewal under medical check condition.
	9. We agree with the motor-home industry when
		1. they claim “there is no significant difference between driving 3.5T or 4.5T motor-homes” (ECF[[9]](#footnote-10) statement in Sept. 2019 contribution on DLD 2006/126/EU).
		2. they confess there is a (qualitative) limit to efforts in lighter and composite material they compete through (ECF contribution in Euro 7 consultation 2020 held by DG Grow).

To give examples, they can’t install electric brakes on 3.5T power-trains, neither automatic gear nor ISOFIX safety belts, resulting in families running with a baby in their arms (!) as we noticed for occasional renting travelers. While they would improve load distribution, rear-wheel drive and dual wheels are almost absent due to their greater weight.

* 1. Looking at the European motor-home landscape, we must understand a fleet of over 2 million vehicles are on our roads at least part time and that they are M1 class leisure cars
		1. allowing up to 9 seats including the driver’s one;
		2. allowing the same traffic and parking rights as ordinary cars, **without discriminations**;
		3. they are 100% Diesel with longer lifetime than ordinary cars and can’t expect any alternate energy equipment being available very soon for most of them, so they need alternate facilities to visit cities with mobility (bikes, e-bikes or scooter);
		4. The growth of this market is there to stay and the current Covid-19 situation highlights the benefit motor-home users enjoy from being able to travel while properly confined.
	2. Recent surge in motor-home demand originates in **rental companies** and new users not familiar with overload penalty risks and passenger limits, namely with 2 or more children whose weight remain lower than 75 kg, the weight norm used to compute the number of allowed passengers.

1. **Our request**

The motor-home community of users asks the European Union to raise the B licence restriction for motor-home users by:

* 1. **Creating a specific sub-type allowing B licensees to drive motor-homes with maximum GVWR <= 4.5 T.**
	2. taking into account
		1. that hybrid Diesel options will probably take place gradually and reduce further the available payload for family leisure regarding the current limit of 3.5T.
		2. that motor-home users require a minimum of 500 kg payload after vehicle approval in order to accommodate options coming over time, **fuel and water** needs for family trips.
		3. Currently, very few motor-homes take more than 4 passengers, while more space is available both for road and night.
		This means that families with 3 or 4 children cannot leave together, which is non-sense.
		Interesting to point that children are for long much lighter that adults, while approval is computed for 75kg per person.
		4. It might seem paradoxical that simple SUV can carry up to 8 passengers and reach 3.5T while motor-homes keep restricted at 4.
	3. taking consideration that, should PVWR be upgraded up to 4.25T providing that the charge beyond 3.5T is restricted to alternate energy equipments (as suggested in DLD EU 2018/645, whereas), then **the increase we ask up to 4.5T is finally reduced to 250 kg.**

Peanuts! The measure would kill nobody and would change nothing in the landscape since 3.5T and 4.5T motor-homes have the same format.

1. Keeping in mind that **4.5T B licence** remains constrained to respect C21 road signs.
2. **Alternative:**
The EC restores its 2018/645/EU suggestion (B licence conditionally set at 4.25T ).

In this case, we demand 250 kg bonus for motor-homes.

1. **The long fight of the motor-home community**

There is a long way for B-licence owners since the first European Directive the EC Roadmap reminds us. B-licence was then restricted at 3.5T.

The growth of registered motor-homes (over 2 million on European roads) is such that it is time for this phenomenon to be followed by adhoc Eurostat figures.

The issue is to plan adhoc night and public service infrastructure at affordable price, allowing motor-home tourism to keep environment friendly.

It is also time to put an end to the unnecessary distress and anger of those who are disproportionately penalised at roadside checks, a difficult situation for both sides.

**C. A better regulation for people**

Emergency and motor-home communities are very open and inclusive regarding public.

They want to serve and show solidarity.

They hope a new Drive Licence Directive will soon provide evidence this aim is recognized.

We thank you for your attention,

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| --- | --- |
| **Dirk DE PAUW****Kolonel - Operationeel - Departement logistiek - Verantwoordelijke wagenpark en materieelBrusselse Hoofdstedelijke Dienst voor Brandweer** **en Dringende Medische Hulp**Helihavenlaan 11-15, 1000 BrusselE: dirk.depauw@firebru.brussels  W: <http://be.brussels/dbdmh> | ***Marcel J. Ch. Vanden Clooster******IFMC Representative before the EU Institutions******International Federation of Motorhome Clubs******Mob: +32 470 70 43 70******e-mail: clooster.ficm@proximus.be******https://www.ficm-aisbl.eu*** |

**Feedback received by the IFMC on firefighters on B licence 3.5T limit**

Dear colleague,

On behalf of the *Fédération nationale des sapeurs-pompiers de France* (FNSPF, French firefighters’ Association), I reply to your enquiry related to EC consultation on the future of the Drive Licence Directive 2003/126/EC.

I can inform you that we approve you position paper in terms of content, although we intend to respond directly to the online consultation.

I also wish to inform you that the French road traffic regulations already enable Firefighters to drive an emergency vehicle up to 4,5 T holding a B type drive licence,  conditionally a simple local training session. <https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000039436165/>

Our Austrian colleagues have obtain even more favourable possibilities (5,5 T and 7,5 T derogations).[https://www.ris.bka.gv.at/GeltendeFassung/Bundesnormen/10012831/FSG-FRV%2c%20Fassung%20vom%2012.01.2021.pdf](https://www.ris.bka.gv.at/GeltendeFassung/Bundesnormen/10012831/FSG-FRV%2C%20Fassung%20vom%2012.01.2021.pdf)

I also believe that similar disposition exists in Poland and that Luxemburg has initiated a procedure.

Feel free to contact me as is necessary.

Kind regards

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| cid:image003.gif@01D57DAD.100E3B40 | *Lieutenant-colonel Christophe Marchal*Pompiers de France+33 (0)6 19 30 13 86  - c.marchal@pompiers.fr[www.pompiers.fr](http://www.pompiers.fr/) |

1. **Final propositions by the IFMC on the 3.5T issue**As already mentioned in our contribution to the last public Ex-Post Evaluation of Drive Licence 2006/126/EU, closed on 20th January 2021,

1. Since C1 licence type is mixed designed for commercial and private use, we suggest moving all M1 type vehicles to the B licence.

2. Within the B regime, create a sub-typing structure dedicated to some special type vehicles as defined by Directive 2001/116/EU, Annex II, paragr. 5.1, which stipulates motor-homes as vehicles specifically designed for living night and day, with bedding, removable table, and sanitary equipment.

3. Define sub-type categories as follows:

 3.1 Small motor-homes up to 4.5T

 3.2 Mid-size motor-home up to 7.5T; remove medical checks[[10]](#footnote-11)
 3.3 Large motor-homes above 7.5T; remove medical checks[[11]](#footnote-12)

4. Motor-cycles below 125 cc

 4.1 Allow B licencees to drive motorcycles or scooters of less than 125 cc instead of 50 cc as now.

 The reason is that many motor-home owners put a motorcycle or a scooter in the boot or install it at the back of the vehicle. It allows them to carry it anywhere in Europe in order to improve their mobility in towns and overturn motor-home or Diesel ban away.

 A specific effort should also be made to allow B licencees to use their less than 125 cc scooter anywhere in Europe, and this right being properly recognised by all Member States.

 4.2 Avoid imposing new Periodic Technical Inspection to motorcycles lower than 125 cc.
 We are of the opinion that new PTI for this range of vehicles could raise unreasonable burden on the average user income and living condition. The consequence could be to discourage this type of mobility in favor of cars or, still much more questionable vehicles like skateboards and mini-scooters, a traffic in towns which is still not sufficiently regulated and suffers a lack of *adhoc* infrastructure.

1. **History speaks by itself**

**1. About the law**Where do the magic weight mentions like 3500kg, 750kg and 4250kg come from?

They are all required by the very first EEC Directive on Drive Licence Regulation.

[FIRST COUNCIL DIRECTIVE of 4 December 1980 on the introduction of a Community driving licence](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31980L1263&from=EN)

See Annex 7 on International Driving Permit.

Which was inspired by the

[Convention sur la circulation routière (avec annexes, et Acte final de la Conférence des Nations Unies sur la circulation routière). Conclue à Vienne le 8 novembre 1968](https://treaties.un.org/doc/Publication/UNTS/Volume%201042/volume-1042-I-15705-French.pdf)

The Convention of 1968 was itself inspired by the

CONFERENCE DES NATIONS UNIES SUR LES TRANSPORTS ROUTIERS ET LES TRANSPORTS AUTOMOBILES Genève, 23 août — 19 septembre 1949 [Convention sur la Sécurité routière – Genève, 1949](https://treaties.un.org/doc/Treaties/1952/03/19520326%2003-36%20PM/Ch_XI_B_1_2_3.pdf)

which was in turn inspired by the

[Société des Nations](https://biblio-archive.unog.ch/Dateien/CouncilMSD/C-322-M-217-1937-VIII_FR.pdf)

[COMITÉ PERMANENT DE LA CIRCULATION ROUTIÈRE RAPPORT SUR LA ONZIÈME SESSION DU COMITÉ 1 Tenue à Genève du 5 au 8 juillet 1937](https://biblio-archive.unog.ch/Dateien/CouncilMSD/C-322-M-217-1937-VIII_FR.pdf)

and the initial

[Convention internationale relative à la circulation automobile](https://www.fedlex.admin.ch/eli/cc/46/720_741_752/fr) conclue à Paris le 24 avril 1926.

The main argument for restricted GVWR at 3.5T comes **from brake constraints**.

**However, this argument must be weighted in light of the current state of brake technologies.**

**There should be no doubt that brakes are far much better and reliable today than hundred years ago.**

**2. A historical perspective**

1. **XVIIth Century**
The first reference we found in terms of standards for GVWR for carts and carriages date from the period of Louis XIV, in France, around 1682-83. In order to complete the Glass Gallery and the Trianon Palace in Versailles, the King needed the most beautiful marble from the Campan Hills, in the Pyrenees[[12]](#footnote-13),.
Blocks of marble weighing up to 3 tons, were transported by 25 to 28 pairs of oxen to the Garonne and Gironde rivers in Bordeaux on heavy sledges, barges and boats along the Atlantic coast.[[13]](#footnote-14) Boats went up the Seine River and blocks were finally loaded onto 500 kg reinforced carts from the Seine to Versailles (weight norms were expressed in "Livres Parisis" units, as redefined by Sept. 1641 Edict of Louis XIII).
From 1686 to 1689, 774 blocks and 12 columns left for Versailles and the journey was long and perilous (over 60 days)[[14]](#footnote-15),[[15]](#footnote-16).

1. **Drive Permits in the USA**
The automotive era started in the US, early in the XXth Century.
New York was the first city to register automobiles in 1901, a decision endorsed by the State and rapidly followed by the other States of the Union. Drive licence appeared in 1918 and weight limit for non commercial drivers and vehicles (Class C Permits) was set at 26000 pounds (12000kg).
Such a weight was justified by the nature of US urban practice (wide and straight avenues and long interstate distances). Also, the rapid development of Far West economy required much flexibility for individual transport. Cars and small trucks were coupled within the same legislation.
2. **Drive Permits in Europe**

Development of the automobile sector started really in Europe after the First World War.
It was obvious after the War that efforts needed to be made in order to make international traffic play a crucial role for reconstruction and redeployment of the economy.

International traffic was seen in-line with the first reflection in modern physics on the role of complementarity (see Niels Bohr’s theory on complementarity).

Complementarity was seen as a major paradigm for Peace, in-line with President Wilson conviction that led to the “Société des Nations”. The surge of this movement created the strength needed to come up with the 2 SDN International Conventions of 1926 signed in Paris related to the Circulation of Automobiles.

**The last question is now: why 3500 kg, 750 kg and 4250 kg?**

The very reason for the SDN restriction at such a level might be bound to the structural nature of European citie’s and road infrastructures.

1. Europe is obviously holding on its centuries of slow development, as opposed to the rapid development of the New World.
2. After World War I, Europe was devastated and so many bridges needed to be rebuilt.
The same situation prevailed in over hundred countries where infrastructure was either destructed or still inexistent. The rapid ratification of the 2 SDN Conventions come to confirm the need felt by governments worldwide for sustainable recovery actions in international traffic management.
3. It is worth noting that the United States could not follow and never ratified those SDN Conventions.
On its side, Afghanistan declined very simply, arguing there was no such traffic problem in their country.

Coming back to the post World War II situation, we understand that the dissolution of the League of Nations in 1946 justified such responsibility being overtaken by a new international institution still to be created: the United Nations.

# The two main sources that inspired 1949 Convention of Geneva on Road Security were the two conventions of Paris from 1926. Another document was also part of working documents for the preparation of the Conference: [1943 Inter-American Convention on Automotive Traffic](https://www.loc.gov/law/help/us-treaties/bevans/m-ust000003-0865.pdf) However , nothing changed in terms of GVWR since the bad condition of the infrastructure was just similar to the one that followed World War I.

# After the 1949 Convention, the 1968 Convention of Vienna gives considerable update on elements of great importance in order to deliver up-to-date international drive permit with measures to facilitate mutual recognition by national administrations (format and content). It provides also fundamental driving rules to be adopted by drivers on the road and basic technical characteristics for approving vehicles.

# I. GVWR as a symbol - Is it explained by history, tradition or rigidity?

# Let us remember that request to the EU to raise the GVWR limit for the B licence is not a new fact.

# Tension is looming as from the start in 1980. The issue of increasing the maximum authorised mass of vehicles that can be driven on a category B driving licence has been rigorously challenged by several governments since the second Driving Licence Directive confirmed the weight limits in 1996.

# 1. Motor-home users have been demanding ever since to raise it to gain in payload because most manufacturers were delivering their un-laden vehicles with too low a payload to support family luggage and equipment.Motor-home users need a minimum of 500 kg of payload under B licence regime.

# We must say they were listened to, motor-home being recognized as special vehicles by Directive 2001/116

# But the priority for the Commission was to recognize the specific nature of motor-home and motor-homing.

# Directive 2001/116/EU defined this new “special vehicle”, with its characteristics.

# In the meantime, vested rights for B licences acquired in the seventies or before created among motor-home users of several Member States a kind of discrimination they could hardly find justified. This generation is now ageing but the problem received increasing attention due to the evolution of technology, every vehicle becoming heavier as from the car industry, namely for security reasons.

# This topic was addressed by the IFMC in the contribution we delivered to DG Grow of the Commission in the context of consultation on the Future Euro 7 norms.

# Many vendors don’t inform enough their clients about the payload limit at 3500kg.

# Some advise them to drive with 20 liters of water in their 100 or 120 liter tank.

# Motor-homes are now often rented either via commercial dealers or by private people.

# Clear and grey water levels play an enormous role for being legal or not, and change along the day.It makes this market place quite troubling. As our FICM Vice-President Mario Mariani put it, repeating what people claim: [I can’t understand](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12978-Revision-de-la-directive-relative-au-permis-de-conduire/F2326883_fr)!

# Directive 2018/645/EU gave hopes for special vehicles to go beyond 3500 kg, unless the increase being dedicated to alternate energy equipment.

# Although this derogation to 4.25T for electric and hydrogen vehicles will no doubt be a success in convincing large vehicle fleet owners to migrate to clean energy, this remains short of satisfying motor-home users, since they are still bound to Diesel technology for a while.

# 2. On the side of the Legislator It is clear that there will be no question so far to raise GVWR under B licence regime beyond the limits admitted by the 1968 Convention. Several active participants in Working Party 1, the UNECE group which considers any changes to the Convention, informed us that this issue has not been raised in that body yet.

# This makes it uncomfortable for the Legislator to make any attempt beyond the magic figures of 3500 kg and 4250 kg. Bringing GVWR up to 4500 kg seems to be unreachable unless the Union makes a step towards the UNICE Working Party I. Would it decline, then we all risk to see more and more lighter furniture in our living, kitchen, bathroom and rooms. A thread manufacturers notified in due time to DG Grow in their June 2020 consultation on future Euro 7 norms.

# In spite of the fact that Members of the European Parliament, and more generally anyone who devotes time to politics, don’t have much opportunity to benefit from motor-homing, the current consultation did answer not only to WHAT people ask for, but above all to WHY they ask it.

# It is now time to draw some conclusions.

# Conclusions

# We will start again by some items we have identified in the consultation, and we will close with the final demand of the Motor-Home community of users and the IFMC.

# 1. Small M2 busses should be allowed to carry 21 passengers in addition to the driver, in order to allow school busses to move a standard class room of 20 pupils to the swimming pool and back to school with their teacher, using a smaller vehicle than a coach.

# 2. New measures should be taken in the domain of embedded electronics in order to improve reliability, usability and interoperability of equipments. Much more care should be devoted to ergonomics as recent publications highlight regarding namely dashboard screens [[16]](#footnote-17). Periodic retraining should be limited to voluntary and specific learning and testing tools. Life is changing in so many aspects that we have now to measure new obligations with more realism to protect people autonomy and freedom.

3. More must be done in terms of early prevention at school, with more consideration for the new sociological fabric technology brings for our comfort, but also to its impact on the entire European population which ought to be regarded as this Greek contribution demonstrates: urban and sub-urban life and mobility on one side, rural and remote conditions on the other side (The Panhellenic Association of Driving Instructors - ref. F2327162). Mini-scooters, skate-boards or mono-wheels present new challenges when they are confronted to unsuitable infrastructure, car traffic and pedestrians.

4. As a study requested by the TRAN Committtee shows[[17]](#footnote-18), rural and remote regions should not be left behind, giving way to demographic decrease. On the contrary, they should be seen by Europe as a chance and an opportunity to implement new ways of clean and sustainable field of development.
Any additional burden like Periodic Technical Inspection on motorcycles of less than 125 cc should be avoided, in order to preserve less favored populations (young and older generations) from being on the roads more than necessary.

At this level, the motor-home community can play a marginal, modest but however interesting role, allowing urban and suburban citizens of every generation to benefit from new local or rural provisions: local producer’s food, services, leisure, and tourism need decentralized logistic support and new qualifications, all essential to fix younger people of these areas.

Also, motor-homes can be seen as the ideal method for changing people view on Europe, since slow tourism allow people from any nation and culture to discover the richness of our continent, taking time to listen.
They just come and pass for other sites to visit. They talk with people which are listened to, and they are some of the best ambassadors of this borderless Europe they have the chance to live in.

What the motor-home community expects from the Union is to allow them amplifying what we call “Slow Tourism” and generating new ways to the younger generation to evade from crowded hot spots, according to a new way of living.

Camping in general but motor-homing in particular are among the most environment friendly ways of travelling and making holidays.

The ADAC insists on the need to include younger generations within this new way of camping: “For the ADAC, it is clear that motor-home tourism should be accessible to all generations and without hurdles.”

This also includes making it easier for the younger generation interested in camping to get started in motor-home tourism. Young motor-home drivers with B licences from 1999 onwards are only allowed to drive vehicles with a permissible total weight of up to 3.5 T. At the same time, motor-homes are receiving safety equipment and become heavier. The accident statistics do not justify the resulting restrictions for the young generation of campers: the number of accidents involving motor-homes is known to be extremely low across all weight categories.

Against this background, the ADAC is in favour of extending the B driving licence for motor-homes up to 4.25T, which would be valid throughout Europe. This requires an amendment of the regulations for a specific category of vehicles, special vehicles like motor-homes, within the framework of a revision of the EU Driving Licence Directive.

***5. Finally, the motor-home community and the IFMC repeat their essential request on the 3.5T issue to be resolved on fair and equitable basis:***

 ***5.1 They ask for a minimum of 500 kg of payload to help carrying family luggage, full clear water tank, bicycles and holiday equipment. Without that minimum, motor-homes are non-product! They can’t simply be used for the purpose they were bought for.***

 ***5.2 The extra allowed weight between 3500 kg and 4250 kg for alternate energy support should be reduced by 250 kg to help both parties: the EU Legislator on one side, the motor-home user on the other.
BE and BE + C licences should be aligned to the new schema of the basic B licence.***

 ***5.3 The motor-home community asks for motorcycles below 125 cc keep open to simple B licencees, in any Member State, in order to allow travelers to visit towns and tour around regions without any restriction.***

We hope this document will help the Services of the Commission and our Legislator in proposing a fair compromise on this very complex issue. We remain open to exchange with them for the better.

European motor-home adepts have the chance to live in one of the three most peaceful regions in the world, with one of the safest regulatory conditions in the world. There is no popular motor-home practice anywhere else outside the United States, Europe and Australia.

Motor-home tourists give a right image of peaceful European middle class population, happy to enjoy the life style of their choice.

This makes the task of convincing UNECE still more complex for our negotiators.

 \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\* By IFMC/FICM - Claude GUET, President \*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

**TECHNICAL ANNEX I: GVWR IFMC guidelines for Motor-home customers
ANNEX II: Blind Spot Problem**

|  |  |
| --- | --- |
|  | **Calculez le poids total de votre camping-car**Art. R312-2 (France)Même en conduisant un poids-lourd, vous risquez un PV de classe 4 à 90€ / 500 kg.Votre véhicule peut être immobilisé dès que vous avez plus de 5% de surcharge.Tarif des pénalités en Europe:Technically unjustified [road checks and penalties](https://www.promobil.de/tipp/ueberladung-gewicht-wohnmobil-strafen/) in Europe (Source: www.promobil.de) |
| PVOM | Poids vide en ordre de marche +75Kg pour le conducteur |   |   |   |
|   |   |   |   |   |
| PTAC | Poids total autorisé en charge (F1) |   |   |   |
|   |   |   |   |   |
|   | Poids à vide carte grise (G1) |   |   |   |
|   |   |   |   |   |
| Charge utile  | la différence entre le PTAC et PVOM |   |   |   |
|   |   |   |   |   |
| Gaz oil |   |   | 100Kg |   |
| Motorisation plus puissante |   |   | 40Kg |   |
| Boite de vitesse robotisée |   |   | 33Kg |   |
| Bouteille de gaz supplémentaire  |   |   | 27KG |   |
| Antenne satellite  |   |   | 15Kg |   |
| Télévision |   |   | 5Kg |   |
| Climatisation |   |   | 25Kg |   |
| Auvent |   |   | 30Kg |   |
| Porte-vélos 2 velos |   |   | 30Kg |   |
| Roue de secours |   |   | 20Kg |   |
| Véhicule Homologué 20L |   |   | 120/200Kg |   |
| Pile à combustible |   |   | 17Kg |   |
| Groupe Elect. |   |   | 33Kg |   |
| Attelage |   |   | 50Kg |   |
|   |   |   |  |   |
| Panneau solaire |   |   | 15Kg |   |
| Stabilisateurs télescopiques |   |   | 50 à 80 kg |   |
| Suspension pneumatique auxiliaire (essieu arrière) : |  |  | 13 kg |  |
| Suspension pneumatique (essieu avant + arrière) :  |   |   | + 65 kg |   |
| Sièges « route » pour passagers AR |  |  | ? |  |
| Ancrages de sécurité pour sièges « enfants » **!!!!!!!** |  |  | ? |  |
| **Total accessoires** |  | 578 kg |  |
|  |  |  |  |
| Equipement de ménage et de literie |  |  |  |
| Vêtements, paires de chaussures |  |  |  |
| Equipement de loisir |  |  |  |
| Mobilité : vélos, vélos électriques ou scooter |  |  |  |
| Documentation de voyage |  |  |  |
| Passagers (poids réel ?) |  | N \* 75 |  |



Blind Spot Problem

Directive 2019/2144 on new general safety regulation updates EU vehicle safety requirements, including those that address the specific concerns of **vulnerable road users**, such as pedestrians and cyclists.
These new measures comply with UNECE / Group I recommendations on Road Security.

Buses and lorries, in addition to meeting general ADAS requirements and being equipped with existing systems (such as lane departure warning and advanced emergency braking systems), must also:

* be equipped with advanced systems capable of detecting pedestrians and cyclists in close proximity to the nearside of the vehicle, warning drivers of their presence and avoiding a collision with these vulnerable road users;
* be constructed in such a way that will help to reduce **blind spots** in front of and to the right side of the driver.

The reason why buses and lorries are subject to these new constraints come from the frequent situation of driver cabs being **above** the engine, in order to maximize usable payload length. In such configurations, the driver’s seat is **so high** that the driver might not be aware of any human presence (pedestrian, cyclist or motorcyclist) on the left or right side of the vehicle. The lengths of the vehicle and of its trailer are further arguments.

However, cars and vans are not included in these specific demands. They face explicitly other safety requests.

Recent Directive 2019/1944 comes to complement former EU/2018/858 Regulation on Vehicle Type-Approval.
A draft of its Annex II has been proposed (2022 Q1), providing Code B6 to identify the information system on Blind Spot Warning.

However, some advanced legislation was issued earlier in France (ref. Décret n°2020-1396 of 17/11/2020) to tackle the Blind Spot problem, that came into force on Jan. 1st, 2021.

A specific Blind Spot information system was indeed inaugurated using “normalised” stickers to be appended on both sides and on the back of any vehicle having GVWR higher than 3.5T, including cars and vans.
Furthermore, the measure was imposed to any vehicle over 3.5T whatever its foreign registration.
Finally, Blind Spot Stickers are identified by a black French mention as “ANGLES MORTS”.

May we point here:

1. The original criteria as “BLIND SPOT” warning is the height of the driver’s cab, not the weight of the Bus or Lorry.
2. Using French text to carry the message is theoretically of no use abroad, where foreign buses and lorries return.
3. Foreign pedestrians or cyclists might be surprised to read abroad and decode unfamiliar text while being so close to the vehicle and the danger. Stickers might become counter-productive.
4. Should the 26 other Member States follow the same course, then we would for sure be all confused: drivers, vulnerable road users and ... the EC itself.

At IFMC, we are strongly committed to repeat that both citizens and legislators ask for clear rules to be devised in order to make them easily applicable and enforceable.

Clarity, flexibility and applicability are key points for people minimal acceptance.

There is no need to look at a draft of advanced European legislation to innovate with tricks and tinkering, going beyond collectively approved objectives and making sure new conflicting legislations are in the pipeline.

This is no European vision at all and that problem should be tackled before it is too late.

1. https://unece.org/DAM/trans/main/wp1/wp1doc/International\_Driving\_Permit\_Categories.pdf [↑](#footnote-ref-2)
2. ADAS: Advanced Driving Assistance Systems [↑](#footnote-ref-3)
3. GVWR : Gross Vehicle Weight Restriction [↑](#footnote-ref-4)
4. GVWR: Gross Vehicle Weight Restriction [↑](#footnote-ref-5)
5. a https://ec.europa.eu/info/law/better-regulation/.e-your-say/initiatives/11930-Driving-licence-legislation-ex-post-evaluation/F473292 - Author: Ursula Zelenka, Österreichischer Automobil-Club [↑](#footnote-ref-6)
6. **“Basics for Corporate Learning: on the role of a Corporate Forecaster in Strategic Planning”**, [Arie de Geus](https://hbr.org/1988/03/planning-as-learning), ex-Vice-President and Corporate Forecaster at Shell, Conference on Strategic Planning, Harvard, 1987, and Professor at the London School of Economics. [↑](#footnote-ref-7)
7. OBM : On Board Monitoring systems [↑](#footnote-ref-8)
8. Formerly Senior Officer at Ministry since 1979, at EC-MOVE from 2004 till 2009 [↑](#footnote-ref-9)
9. ECF : European Caravan Federation - https://www.e-c-f.com [↑](#footnote-ref-10)
10. Specific medical checks others than imposed by general practitioners are not required; they would constitute an excessive burden for the yearly mileage average drivers really fare. Eldest drivers of motor-home don’t travel so much, and remain in peaceful places to rest. [↑](#footnote-ref-11)
11. Large motor-homes beyond 7.5T represent les than 5% of the fleet ; most of their owners are entrepreneurs or former professional drivers. They usually have their C licence since many years or are ready to pay for it. [↑](#footnote-ref-12)
12. « Les Défis du Roy Soleil », Science  Grand Format, 89’, 16/05/2021, FR5 [↑](#footnote-ref-13)
13. [“The marbles of the Languedoc and Pyrenees: from mountain to ornament”, Suzanne Raynaud and René Fabre, April 2016](https://journals.openedition.org/pds/1000?lang=es) (§32, fig. 12a, 12b, 12c) [↑](#footnote-ref-14)
14. [7-Ton marble columns from Campan erected in Versailles](https://www.google.com/search?client=opera&q=marbre+de+campan+versailles+colonne&sourceid=opera&ie=UTF-8&oe=UTF-8) : sound transportation norms made it possible in the XVIIth Century! [↑](#footnote-ref-15)
15. https://sites.google.com/view/carriere-marbre-campan-payolle [↑](#footnote-ref-16)
16. <https://www.autoexpress.co.uk/news/352729/distracting-car-infotainment-screens-investigated-uk-accident-rates-plateau>

[https://www.autocar.co.uk/car-news/motor-shows-geneva-motor-show/honda-bucks-industry-trend-removing-touchscreen-control <https://www.autocar.co.uk/car-news/industry-news/analysis-car-makers-face-screen-test-judge-safety>s](https://www.autocar.co.uk/car-news/motor-shows-geneva-motor-show/honda-bucks-industry-trend-removing-touchscreen-controls) [↑](#footnote-ref-17)
17. “Transport infrastructure in low-density and depopulating areas”, Policy Department for Structural and Cohesion Policies

Directorate-General for Internal Policies PE 652.227 - February 2021 [↑](#footnote-ref-18)