



# MAG Ireland

*The Irish Motorcyclist's Action Group*

## **MAG Ireland response to RSA Request for Comment on Type Approval**

There is a great deal of anger amongst the motorcycling community in Ireland at present owing to a number of issues arising out of the EU's type-approval proposals.

As the sole representative organisation for Ireland's 30,000+ motorcyclists, scooter & moped riders, MAG Ireland has recently been dealing with a storm of protest surrounding these issues, not least over the weekend of 24th/25th September 2011 when thousands of bikers took to the streets to vent their frustration at the perceived hostility of the "powers that be" towards us as motorcyclists.

We have also had to combat a great deal of misinformation in the media, where numerous outlets broadcast inaccurate stories surrounding a non-existent proposal to ban motorcycles in excess of seven years old.

MAG Ireland is hereby responding to the RSA's request for comment via the RSA web site page at <http://www.rsa.ie/en/RSA/Vehicles-and-Legislation/Vehicle-Standards/Motorcycles> in order to set out our position and explore the issues properly. In particular, we need to examine the key proposals as set out in the EU Type Approval documents.

Our members tell us that the most contentious issues for them are;

- The proposal for mandatory ABS
- The proposal for "anti tampering"
- The proposal for Periodic Technical Inspection/Road Worthiness Testing
- On-Board Diagnostics (OBD/Repair and Maintenance Information)

MAG Ireland has a proven track record of working with government agencies including the RSA. Our aim is to ensure best practice in relation to issues surrounding the integration of motorcycles in transport planning. In this context we offer the following comments on the proposals.



# MAG Ireland

*The Irish Motorcyclist's Action Group*

## **Mandatory ABS.**

No one has any problem with ABS per se. The issue is a fear that it will be mandated to be always on. ABS is a superb system on well surfaced roads, however where you have a poor road surface or loose gravel/loose chippings ABS can cause more problems than it solves.

Loose chippings are often left as a surface dressing here in Ireland many bikers, have regularly turned a corner and found loose chippings as a road surface. In this situation even gentle braking activates the ABS – thus upsetting the stability of the machine potentially causing a loss of control. This is because, unlike a car, the dynamics of a motorcycle mean that stability, bank angle, braking (or acceleration) and trajectory are all inextricably linked. ABS is also unsuitable for many of our tertiary roads (or “boreens”) for similar reasons.

What is needed here is a system whereby the ABS can be turned off when the circumstances necessitate direct manual control of the braking capabilities. This type of ABS system is already in widespread use, most notably on BMW's best selling GS series motorcycles. The ABS system defaults to “on” when the ignition is switched on. Where conditions warrant disabling it, a rider has the option to disable it temporarily, and it again defaults to “on” when the ignition is next switched on.

The owners of dual purpose bikes such as the BMW GS series specifically bought their machines because they could go on and off road. In the Irish context, they are superbly suited to our secondary roads. Mandatory “always-on” ABS would make them entirely unsuitable for off road use. We are aware that Trials and Enduro competition bikes won't be subject to the requirement to have ABS fitted, however many riders purchased dual-purpose machines because they couldn't afford to have two bikes (and as noted above, for Irish conditions this class of machine is ideal for the natural ‘habitat’ of many riders – Regional country roads).

If riders are unable to use such machines off road then they will simply stop buying dual-purpose motorcycles. This could have serious implications for European bike manufacturers. All riders are asking for is the ability to disable ABS should the situation warrant it.



# MAG Ireland

*The Irish Motorcyclist's Action Group*

## **Anti-Tamper**

This is the most contentious issue of all. While we understand that part of the reasoning behind this is to prevent inexperienced riders attempting to increase the power of their bikes beyond specified legal requirements, we know from long experience that this is infrequent. Given the social nature of motorcycling, other riders would soon tell you if you were attempting something dangerous to health or wallet.

To quote the FEMA (The Federation of European Motorcycle Associations) position on this<sup>1</sup> :

Modifications must not mean that motorcyclists are breaking their licence conditions. As long as modifications do not lead to a change in driving licence conditions it must be seen as modification and not as tampering.

From a rational point of view modification (investment of time and financial resources) leads to improvement: to suit personal height, weight, driving style, and taste. Within the motorcyclists community there is a well established and long-lasting culture of modification and to conduct maintenance and servicing on one's own. FEMA aims at protecting this freedom.

In essence, riders merely want to retain the right to work on their own machines and have the same choice and options as a user of any consumer product would have.

Other concerns raised to MAG Ireland have been :

- Whether tyres will be considered as part of the power-train. Different tyres suit different bikes, different compounds work better in some countries than others.
- Will the regulations prevent a rider putting on a different/smaller/larger chain sprocket? There are valid reasons for wanting to do this, for example a bike primarily used in urban commuting situations benefits from a smaller front sprocket to lower the gearing slightly, whereas a bike used primarily for motorways/main roads benefits from a larger sprocket to increase the gearing slightly. The manufacturers choice, for obvious reasons, is a best compromise which is not ideally suited to either situation.

## **Type Approval**

MAG Ireland has no fundamental objection to the type approval proposals, and are strongly in favour of expanding the durability requirements to cover all parts, not solely the emissions control systems.

---

<sup>1</sup>[http://www.fema-online.eu/uploads/documents/vehicle%20aspects/20100304\\_frameworkreg\\_position.pdf](http://www.fema-online.eu/uploads/documents/vehicle%20aspects/20100304_frameworkreg_position.pdf)  
The Irish Motorcyclists Action Group. 94 Merrion Square West, Dublin 2. Tel: 01 602 0695 Fax 01 602 0696  
Website: <http://www.magireland.org> email: [office@magireland.org](mailto:office@magireland.org)



# MAG Ireland

*The Irish Motorcyclist's Action Group*

## Periodic Technical Inspection (PTI)

**MAG Ireland** opposes the imposition of Periodic Technical Inspections for the following reasons;

- There is no evidence that mechanical failure of the motorcycle is in any way a statistically significant factor in motorcycle accidents.
- Experience in countries which have PTI for motorcycles shows fewer than 5% fail mechanical inspections.
- In an Irish context, with 46 NCT centres, and approximately 46,000 registered motorcycles - assuming even distribution, that would require a dedicated motorcycle inspector to cover a mere 2 - 3 motorcycles per day, rendering such testing financially non-viable.
- There have been expressed concerns that PTI may adversely affect customised & one-off motorcycles.

Motorcyclists are acutely aware of their vulnerability; what would be a relatively minor, and potentially undetected, fault on most other road-going vehicles becomes immediately obvious to a motorcyclist. This is partly down to the close interaction between rider and machine, and a reason few motorcycles fail technical inspections.

Motorcyclists typically perform P.O.W.D.E.R checks<sup>2</sup> before setting out. This habit is reinforced by initial (IBT) and advanced (post-test) training. Recent surveys by MAG Ireland suggest that just over 50% of motorcyclists had taken additional training, either pre- or post-test including training to the RoSPA advanced riding standard. Most pre-test training was above the RSA test standard. All training reinforces the P.O.W.D.E.R. concept.

---

<sup>2</sup>P.O.W.D.E.R: Petrol, Oil, Water, Damage, Electrics, Rubber <http://www.rsa.ie/Documents/Road%20Safety/Motorcycles/>



# MAG Ireland

*The Irish Motorcyclist's Action Group*

## **On-Board Diagnostics (OBD)**

MAG Ireland supports the FEMA stance on both OBD and RMI (copied below)

### **On-Board Diagnostics (OBD)**

FEMA supports the voluntary introduction of On-board Diagnostic systems (OBD) under the condition that whatever information provided or recorded by an OBD device is freely accessible (see RMI).

### **Repair and Maintenance Information (RMI)**

FEMA is strongly in favour of the free availability of RMI since it allows parties other than motorcycle manufacturers to maintain and repair motorcycles. Without RMI the consumer had to face a manufacturers' monopoly resulting in high costs. Access to RMI has to be granted in order to preserve a long-lasting motorcycle culture of modifying / maintaining / improving bikes.

FEMA is not sharing concerns of unprofessional repairs or easy access to vehicle-theft caused by access to RMI, since there are no statistical numbers available indicating that such dangers do exist nor motorcyclists expressing their concerns about these issues.

Concerns have been raised to MAG relating to a potential for function/feature creep on any OBD systems, including long-term monitoring of vehicle speeds etc. While MAG understands that no such objectives currently exist, we will feel obliged to raise an objection should such proposals arise.



# MAG Ireland

*The Irish Motorcyclist's Action Group*

## **In summary**

Please understand that MAG recognises the vulnerability of motorcyclists, has long held the view that rider safety is important and has worked hard to promote legitimate and proven methods to reduce the risks. Examples of our road-safety initiatives include:

- The founding of the Irish Rider Training Association – the only national network of highly qualified motorcycle instructors, long before the compulsion to take training became law.
- We co-wrote the publication of “This is Your Bike” with the RSA.
- Consultation on the content of the New “Rules of the Road”.
- Involved in the EU funded “Initial Rider Training Project”<sup>3</sup>. The training manual of which is now the template for learner level rider training in many parts of the world. It is viewed by many organisations and road safety experts (including here in Ireland) as best practise – and is recommended by the RSA’s ADI unit.

We are motivated by the fact that it is better to have Riders educating Riders.

© MAG Ireland - October 2011

---

<sup>3</sup>[www.initialridertraining.eu](http://www.initialridertraining.eu)  
The Irish Motorcyclists Action Group. 94 Merrion Square West, Dublin 2. Tel: 01 602 0695 Fax 01 602 0696  
Website: <http://www.magireland.org> email: [office@magireland.org](mailto:office@magireland.org)