

## **Response of MAG Ireland to National Motorcycle Safety Action Plan consultation document**

### **Primary Actions:**

Action No:

1. While we laud the idea, we believe more research is needed to establish the causes of accidents before remedial action can be undertaken.

### **Engineering, Traffic Management and Planning:**

2. The EU already has standards for highway maintenance management. If these standards became the norm throughout Ireland then this would significantly upgrade the whole road system, and mean that all the local authorities would be working to the same standards.
3. Agreed – No. 2 above.
4. The Road Safety Auditing team should include a technically competent active motorcyclist. We can suggest a number of suitable individuals in this regard.
5. We wholeheartedly endorse this approach.
6. Whilst we agree with this, we feel that there is a great need for training of other road users to look out for motorcyclists.
7. Enforcement of existing road traffic laws by all Gardai would go a long way towards reducing the level of accidents in these areas.
8. While traffic calming is desirable, we believe that reducing the speed limits to 30 KPH is unenforcable. Whilst it is accepted that inappropriate speed kills, realistic upper and lower speed limits need to be researched.
9. Agreed.
10. Agreed.
11. Agreed but more detail needed.

### **Road Maintenance:**

12. This is a great idea if responsibility is taken for responding and actioning to the information received. MAG Ireland has been offering a similar resource to motorcyclists for many years on our website. Sadly, road engineers throughout the country have failed to respond to our letters and complaints.
13. MAG Ireland would prefer if the standard was the same as the UK Highway Agency standard which was agreed with a working group including motorcyclists and is highly effective.
14. Whilst we agree, we feel that this is a minor matter in this context.

### **Safety Barriers, Motorcycles in Bus Lanes and Motorcycles in Advanced Stop Boxes:**

15. EN1371 is currently under review at EU level. MAG Ireland is represented by FEMA (The Federation of European Motorcyclists' Associations) at an EU level.
16. MAG Ireland firmly believe that the report from the UK Transport Research Laboratory is seriously flawed for use in Ireland as the report was based purely on UK driving standards where training is the norm and no research has been undertaken in any country where training is not the norm. We firmly believe that at the very least a trial period needs to be implemented in the near future so a report can be based on Irish road experience. The UK has a different Rules of the Road, enforcement is at a much greater level than in this country and this was not reflected in the TRL report.
17. This has already been implemented in the Netherlands with positive results.

### **Vehicle Design and Testing:**

18. This is already under way at an EU level and we fully support this proposal.
19. As according to your figures, less than 1% of motorcycle road accidents are caused by vehicle failure, we cannot understand the reasoning behind this action item. Indeed the EU looked at this issue some years ago and decided there was no need to implement any requirement for Europewide NCT. In Germany, they have recently lowered the standards for motorcycles as

they found that motorcyclists are so aware of their vulnerability that they maintain their vehicles to a higher standard. As motorcycles are kept in road use for longer than cars on average, one of the problems encountered by the EU was the emissions standard that would need to be applied. There are few machines available for a lot of the tests used in the NCT. In Germany and the UK, these examinations are always carried out by a qualified mechanic for this reason.

20. Agreed.
21. Agreed – we are aware that thicker posts have lead to a larger blind spot and concern has already been expressed at an EU level. This needs to be linked to driver training to make them more aware of blind spots.

### **Protective Clothing:**

22. In a recent Garda Survey, 97% of motorcyclists already wear helmets. While we can understand your concern, we feel that motorcyclists are fully aware of their vulnerability.
23. MAG Ireland has been campaigning on this issue for many years both at State and EU level and would welcome your support.
24. Agreed.
25. The EU standard EC2205 already exists and is totally appropriate. Under EU legislation, Ireland cannot independently set a new standard.
26. We believe that the correct way to implement this proposal would be at EU level so all states can avail of the resultant findings. Please not that the “SHARP” system is under severe criticism in the UK therefore it’s credibility at present is questionable.
27. Agreed.
28. We would further extend the removal of VAT to body armour such as chest protectors, back protectors et cetera.
29. Whilst we feel that this is a very noble sentiment, it is a gross invasion of civil liberties. MAG Ireland has always promoted the use of protective clothing and will continue to do so into the future but at what stage does the individual rider’s right to decide become subservient to unwarranted interference by the State?

30. We have found no research that proves that the wearing of hi-visibility jackets has a measurable effect on the observational skills of other road users. This is an issue we would fight hard against on our member's behalf. Travelling round Dublin city and other urban centres in particular, one can see a sea of hi-visibility jackets on all classes of people, for example building workers, delivery drivers, schoolchildren, cyclists, Gardai and motorcyclists.

### **Visibility/Daylight Running Lights:**

31. In contrast, our road safety officer (Linda O'Loideoin) has stopped using a yellow hi-viz jacket in favour of a reflective purple "H" belt as the visual impact of this is much greater purely because it is different from the standard yellow. We believe that hi-viz colours need to be assigned to different classes of road users e.g. builders – orange, emergency services – green et cetera so that other road users will associate the various colours with the type of hazard that could be connected with them.
32. Whilst we agree with the importance of not obscuring hi-visibility clothing, given the high percentage of collisions from the side and front, we fail to see the point of this, apart from "luggage is safest carried on the bike – not the rider".
33. We would welcome the opportunity to meet with you on this issue as many motorcyclists already use their headlight as an aid to conspicuity. Our only concern is the use of headlights by other roadusers.
34. Agreed.

### **Fuel Spillages:**

35. We are very pleased to see this included in the Plan as diesel spillage especially can be lethal to motorcyclists and again we call for greater enforcement of current legislation in this regard.

### **Speed Issues:**

36. Agreed.
37. Whilst we agree with the use of speed surveys, how is it known that speed was a major factor in these accidents? Referring to

our opening statement, research is the key to establishing the causes rather than treating symptoms. Vehicle activated speed signs are visually very effective such as the ones commonly used in France to focus the rider's attention to his/her speed.

38. In the UK where local authorities no longer collect the revenue from cameras, their use is falling as it was discovered that they often created accident blackspots as drivers often braked sharply to avoid the camera.
39. Ditto.

**Alcohol/Drugs Impairment:**

40. We fully support this action providing it is equally applied to all road users.
41. This should already be done at accidents for all vehicles/drivers.
42. Agreed.
43. Agreed provided this is for all road users, not just motorcyclists, as implemented by Noel Gibbons, Road Safety Officer of Mayo County Council.

**Licensing Issues, Vehicle Excise Duty Evasion and other Driving Offences:**

44. This is already illegal and enforcement is all that is needed at this point.
45. How does the payment of Motor Tax improve the safety of motorcyclists?
46. All road users should be made fully aware of the consequences of breaking the law in this regard.
47. MAG Ireland can fully understand the use of ANPR system as is in use in the UK to keep road users who blatantly break the law off our roads. In this regard, however, the database must be kept fully up to date.
48. Agreed.
49. Agreed provided it is for all roadusers.

### **Rider Testing and Training:**

50. Agreed.
51. Funding and resources would be required to implement this, e.g. off road sites.
52. We fully support this measure. Currently most riders avail of the RoSPA or IAM standard.
53. This is obviously required before such courses can be held.
54. Please define "relevant bodies". We fully support this issue and have for many years encouraged riders to take post test training.
55. AXA Insurance and Quinn Insurance have already implemented such a scheme very successfully.
56. Agreed.
57. Agreed.
58. MAG Ireland is aware that there is great interest in such courses and would welcome their establishment nationwide.
59. MAG Ireland has been calling for this for many years.

### **Education:**

60. MAG Ireland fully supports your call in this matter as for many years we have said that teaching young roadusers awareness would be a great aid to road safety.
61. Agreed.

### **Publicity, Promotion and Dissemination of Information:**

62. Whilst we agree in principle with this action, our concern would be that other road users would automatically blame motorcyclists in the case of a collision.
63. We would fully support the implementation of any such programme.
64. Agreed.
65. See our replies to action numbers 31 and 32 above.

66. Agreed.
67. ELearning, the use of the internet and PC games has proven to be very effective – see Initial Rider Training Project [www.initialridertraining.eu](http://www.initialridertraining.eu)
68. Agreed – also in driver compulsory basic training.
69. Liasing with embassies and consulates to target these groups would be the most effective way to educate these road users.

#### **Road Users Attitudes:**

70. Whilst we fully support the aim of this action, we feel that stronger enforcement of existing legislation by all Gardai (and not just the Traffic Corps) would have a positive effect on people's attitudes.

#### **Communication:**

71. We would welcome a national forum for road safety officers providing it includes NGOs such as MAG Ireland in such a forum
72. MAG Ireland always welcomes such enquiries as motorcyclists regularly discuss such issues with us.
73. MAG Ireland believes that such research is required for improving road safety.
74. Agreed – see also action item 45.
75. Compulsory Basic Training should generate a report to yourselves. Whilst we can understand why you would want to know how many riders have taken post test training, this surely could be done in conjunction with ADI and insurance companies.
76. MAG Ireland would welcome such a database and would also welcome access to same.
77. Perhaps the bad summer weather in 2006 may have been a contributing factor in lowering motorcyclists' annual mileage and thereby reducing accident statistics in that year. There is a group of riders who prefer to only ride in good weather and would have stayed off the roads during the inclement summer weather. There has been a noticeable increase in the amount of

riders taking post test training and encouraging others to do so in recent years and this would have had a positive effect.

78. We believe that any targets set must be realistic and not wishful. We would all love to see a zero accident rate but if such is never achieved, then people may give up trying to attain an impossible goal.

Mag Ireland fully supports this consultation document and look forward to helping you implement sensible strategies to reduce motorcyclists' deaths and injuries. One of our prime concerns would be the funding issues that many of these action items would require. We know through experience that quite often lack of funding is cited by local authorities as the reason for lack of action.

23 June 2009

**Gearóid O Byrne**  
**Chairman**  
**MAG Ireland**

MAG Ireland was set up in 1985 and represents the interests of Ireland's 40,000 motorcyclists, scooterists and moped users. Areas tackled by MAG Ireland include road safety, training, road conditions, technical harmonisation, tax issues and consumer issues affecting riders, licensing and insurance.