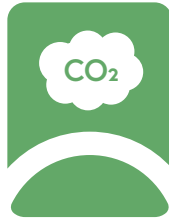




mcia
Today's Industry. Tomorrow's Journeys

A LICENCE TO NET ZERO



UNLEASHING OUR POTENTIAL, LICENCE REFORM ESSENTIAL

L-CATEGORY LICENSING REFORM PROPOSALS
October 2023

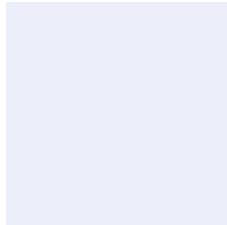


L0*

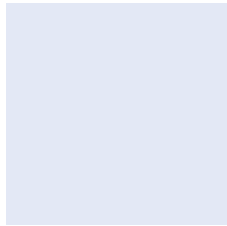
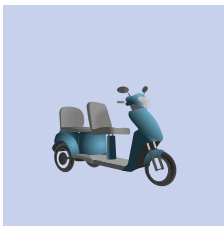


*The L0 category does not currently exist. Our proposal suggests the creation of this category to cater for new lightweight mobility solutions.

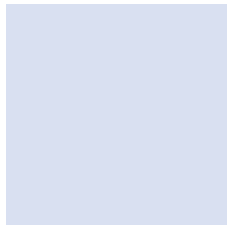
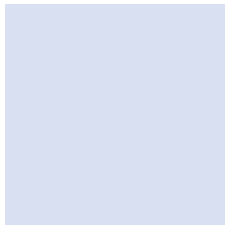
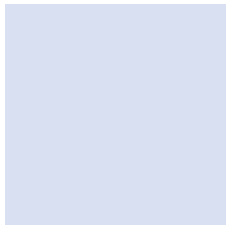
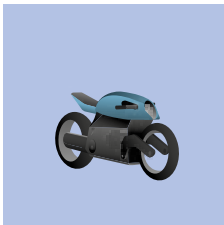
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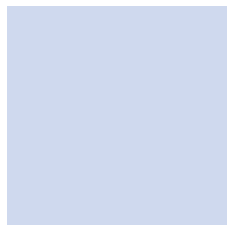
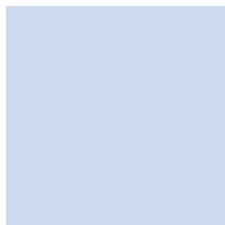
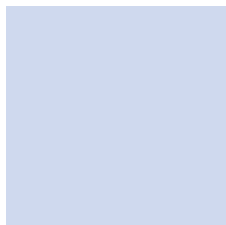
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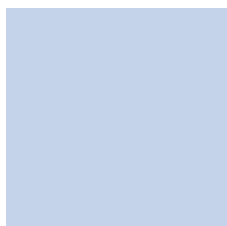
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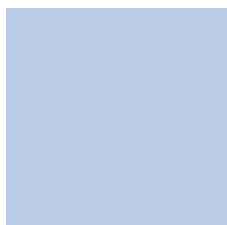
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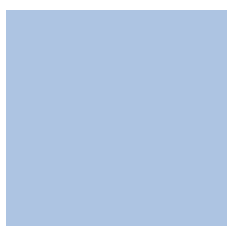
L5



L6



L7



Introduction

This document puts forward proposed changes to the existing [L-Category user licensing](#) regime.

L-Category vehicles include powered two, three and light four-wheeled vehicles e.g., mopeds, motorcycles, tricycles and quadricycles (micro cars). Collectively, as they are referred to in this document, they are also known as powered light vehicles (PLVs).

Though primarily focused on L1 (mopeds) and L3 (motorcycles) or Powered Two Wheelers (PTWs) as they are known, this document also includes proposed changes to L2 (three-wheeled moped), L5 (powered tricycle), L6 (light quadricycle) and L7-Category vehicles (heavy quadricycle).

Context

Now the UK has left the EU, we believe it is the right time to review the current training, testing, and licensing regime for PLVs (in line with EU requirements and the 1963 Vienna Convention, as care must be taken to ensure mutual recognition of licensing as far as possible).

Achieving net zero by 2050 is one of the biggest challenges facing the Government. Key to ensuring this is transitioning the UK's transport sector to low and zero emissions.

The Government's [Transport Decarbonisation Plan](#) recognised the role PLVs have to play in achieving net zero for the first time. However, to successfully realise its environmental and future of mobility ambitions, the Government must first ensure the right policy, financial, and regulatory incentives are in place for the sector's untapped potential to be fully unleashed.

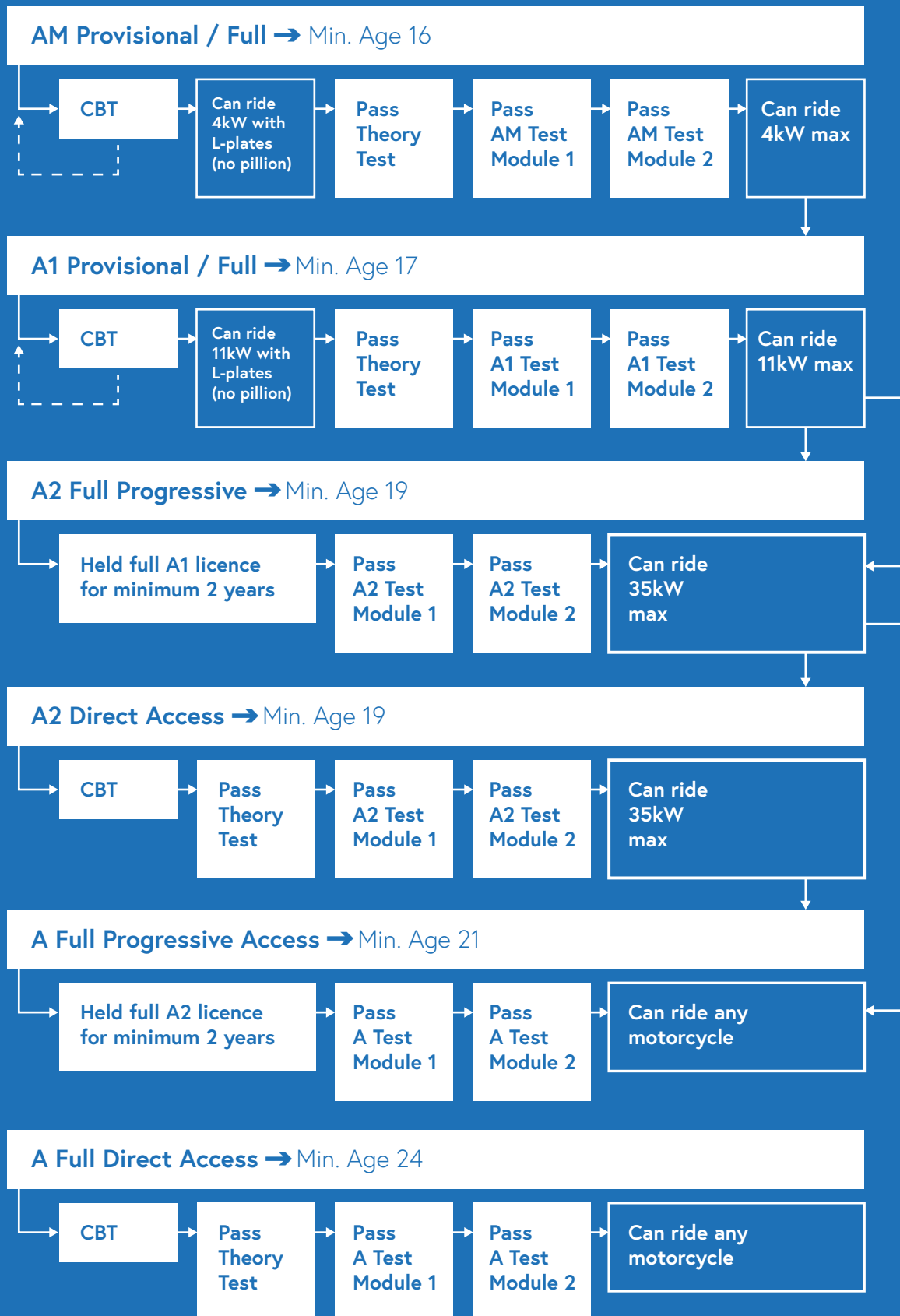


The National Motorcyclists Council (NMC) values the chance to contribute to the development of 'A Licence to Net Zero'. While there are some small disparities between the industry's and riders' perspectives, we share MCIA's belief in the need for significant reform via a comprehensive review of the current regime and the general principles upon which this document is based. Both our positions on the fundamentals of licensing reform align and we are pleased to add the NMC logo to 'A Licence to Net Zero' in recognition of our shared aspirations.

The DVSA/DfT Motorcycle Strategic Group has the potential to affect change, but it lacks the authority to do so. Through ministerial empowerment the group can initiate a proper reform process, and the development of new regulations. NMC's own 'Position on the Testing and Training of Motorcyclists' will be reissued in late 2023, emphasising our collaborative approach with MCIA.

The NMC is a coalition of motorcycling representative organisations which work together on issues affecting motorcyclists.

Current Licensing Regime (PTWs)



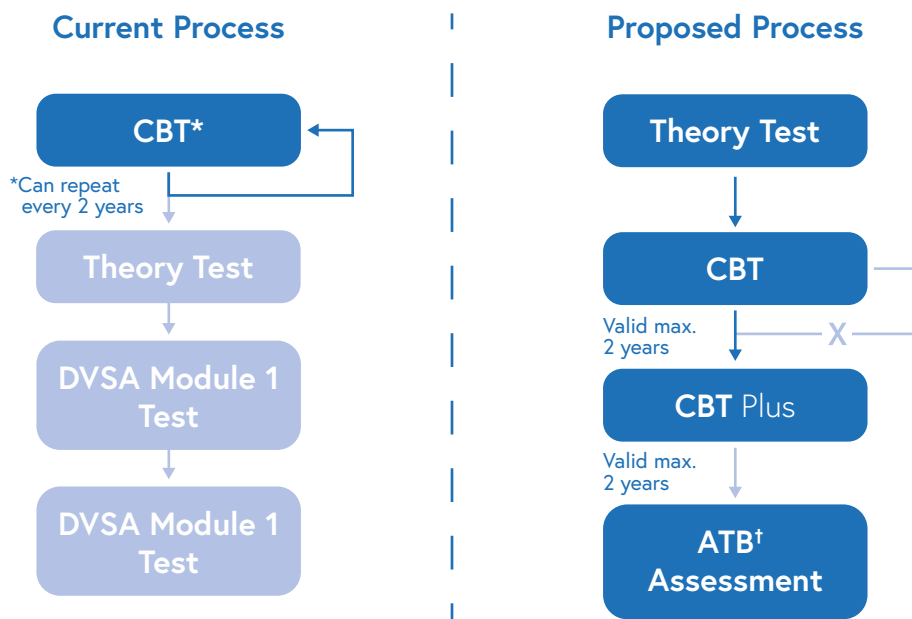
Net zero drives, licence reform guides



MCIAs joint Action Plan: [Realising the Full Potential of Zero Emission Powered Light Vehicles](#), tasked to us by the Government, explores these requirements in more detail, including the need to reform the existing PLV licensing regime as a key element of this transformation.

Obtaining a PLV licence is burdensome, repetitive and costly with intimidating testing requirements. Simplifying the licensing process would significantly lower barriers to entry, remove duplication and reduce costs. Safety can be improved rather than compromised in the pursuit of these objectives.

The EU's 3rd Driving Licence Directive (3DLD) introduced changes for mopeds and motorcycles, aiming to encourage progressive access. However, it unintentionally created incentives that favour the direct access route (available for individuals aged 24+ with no prior experience) over the progressive access route (gradual progression through licensing stages). For example, the introduction of re-taking the same two-part test at each licensing stage discouraged users from pursuing the progressive access route. Additionally, 3DLD resulted in learners perpetually riding with L-plates after Compulsory Basic Training (CBT), as it removed the incentive to take the A1 test (for 125cc motorcycles) and undergo full training and testing.

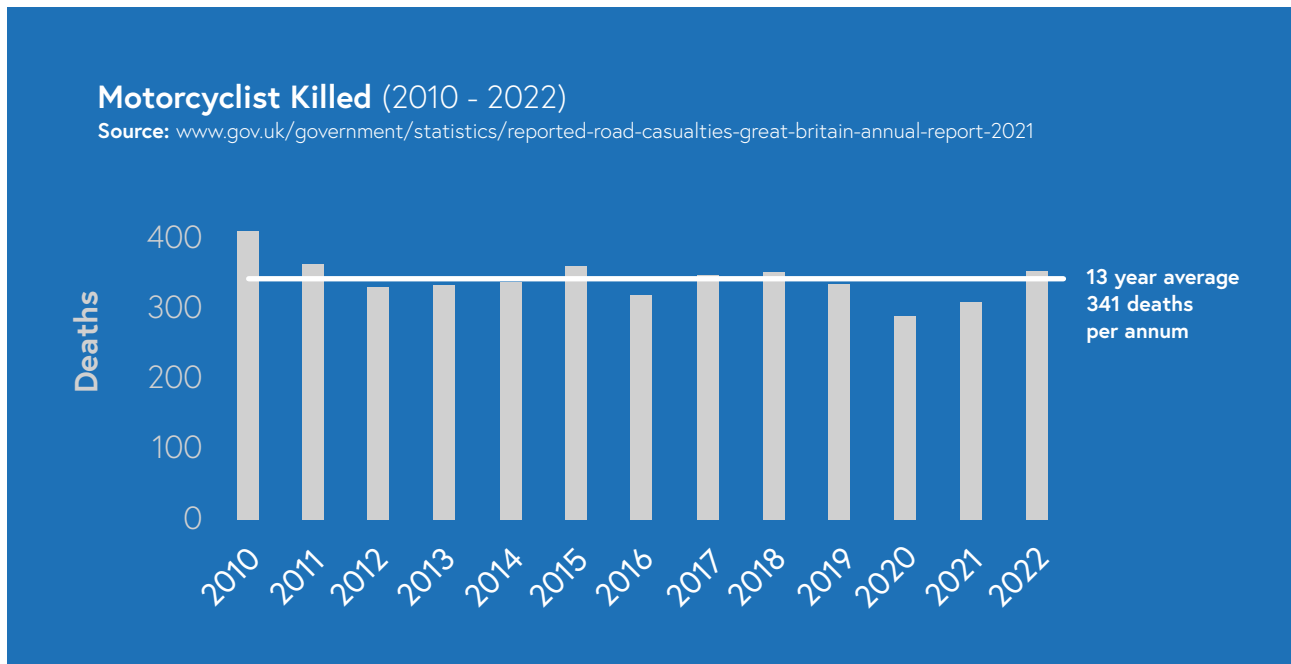


[†]ATB – Approved Training Body (DVSA approved motorcycle training provider)

Mopeds and motorcycle casualties have remained largely the same over the last decade, demonstrating 3DLD hasn't improved road safety in the way it intended. In 2017, the Driver and Vehicle Standards Agency (DVSA) published its response to the 'Improving Moped and Motorcycle Training' consultation. Despite resounding support for these proposals, they have not yet been implemented. We urge Government to act on these recommendations independently, whilst initiating a full-scale review of the existing L-Category licensing regime. If no further action is taken, safety improvements will be hindered and the role PLVs have to play in the decarbonisation of transport will be negatively impacted.

The UK needs a modern, forward thinking licensing regime, one that will help address existing user safety and cater for the needs of new vehicle types and new users entering this sector, with both safety and convenience in mind. PLV's represent just 1% of the overall traffic mix, yet they account for 20% of all fatalities. Despite this,

the Government has rightly recognised the immense potential of PLVs in accelerating the journey towards net zero emissions, and enhancing the quality of our urban and suburban areas, but it must double down on these ambitions if they are to become a reality.



Instead of basing policy decisions solely on historical safety concerns, the Government needs to adopt a forward-thinking approach, anticipating the future traffic mix and the necessary charging and road infrastructure. PLVs hold significant untapped potential and can offer solutions to many societal and transportation challenges. Not only are they lightweight and use less road space, but they also act as an affordable and efficient solution to personal and goods mobility.

Rather than being a reason to disregard them, their safety track record should serve as motivation to liberate and optimise their viability as a sustainable mode of mobility for the future.

MCIA calls to action

We are calling on the Government to conduct a full-scale review of the existing L-Category licensing regime.

1	Earlier access to L-Category vehicles, including creating two new vehicle categories - the electric light moped and the e-step scooter.
2	Incentives for moped and A1-Category (125cc) vehicle users to gain a full licence, and lower access ages for A2 and Full A licences.
3	All licence upgrades and access to L-Category vehicles up to 22kW to be carried out by a DVSA certified motorcycle instructor. The instructor must be working within an Approved Motorcycle Training Body (ATB) and will undertake additional training to become a DVSA certified assessor.
4	CBT to be taken once, and valid for two years. After two years, users should take a new 'CBT Plus', valid for two years, to improve their skills rather than maintain their current level. After 2 years, users on CBT Plus will go on to take a final assessment carried out at their ATB to gain a full licence.
5	Returning to a single event test, instead of the current module 1 and module 2 tests.
6	A review of minimum test vehicle and licence entitlements for all electric L-Category vehicles.
7	A review of tricycle and quadricycle licensing & testing (L2, L5, L6 & L7) that retains current regulation entitlements, but allows for additional access under provisional licence restrictions. Age 16 for L2 and L6, and the introduction of direct access to L5 and L7 at 18 years of age.

Proposals in detail

1

Proposal 1: Earlier access to L-Category vehicles, including creating two new vehicle categories - the electric light moped and the e-step scooter.

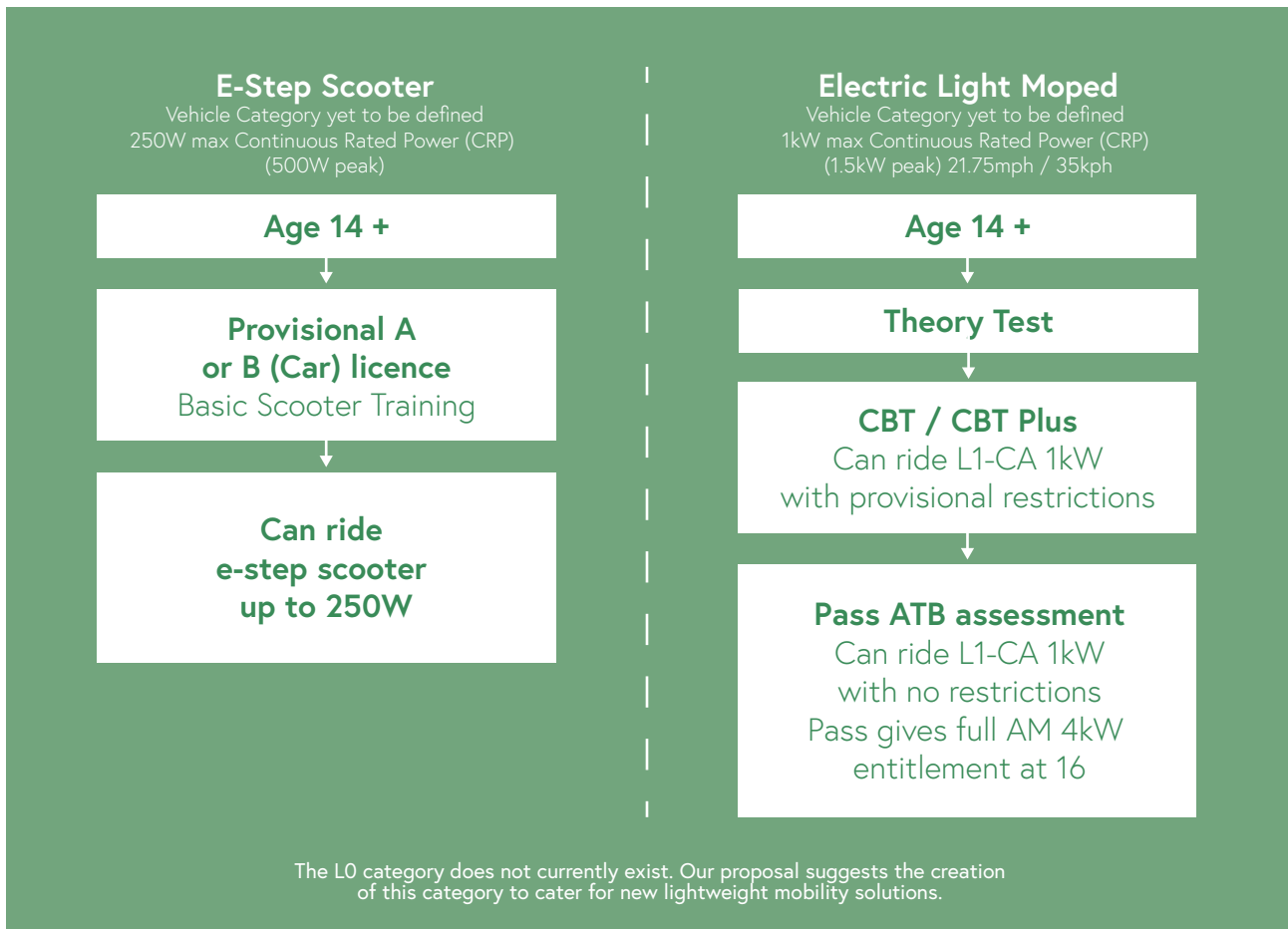


E-step scooter: The creation of a new 'L0' Category for e-step scooters and other micromobility devices will ensure quality and safety improvements. These should be registered and adhere to a maximum continuous power of 250W and a maximum peak power of 500W. Users should hold a licence, insurance, basic scooter training and mandatory use of a cycle helmet.

Electric light moped: The creation of a new 'L1-CA' Category for a new light electric moped that will provide a viable transport alternative for young people currently reliant on less environmentally friendly forms of transport (older cars being driven by parents and/or affordable older cars etc). These should be registered and adhere to a maximum continuous power of 1kW and a maximum peak power of 1.5kW, speed limited to 21.75mph/35kph. Users should hold a licence, insurance, theory test, CBT, and mandatory use of a motorcycle helmet.

The age of access for a new electric light moped should be brought into line with e-bikes, which can be accessed by those aged 14 and over. A new electric light moped will provide a cleaner, more affordable, and accessible form of transport for young people or those on low incomes, helping to discourage reliance on parents or other family and friends, ensuring young people do not become socially isolated. This will also help to ensure new road users learn about the rules and safety of the road at an earlier age, whilst restricted to lower speeds.







MCIA also propose reducing the age of access to A2 PTWs to 18 and lowering the age of direct access to a full A Category licence at 21 years of age.

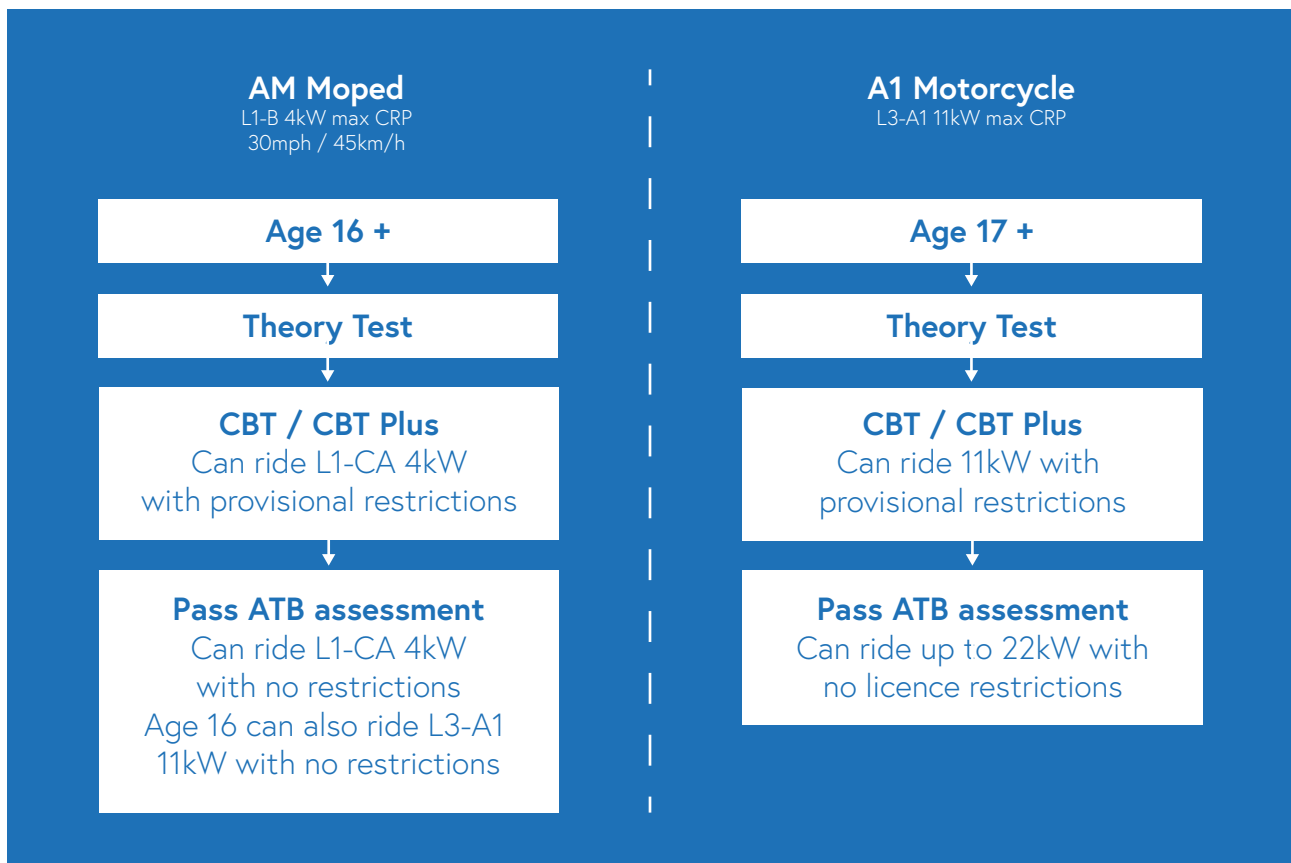


2

Proposal 2: Incentives for moped and A1-Category (125cc) vehicle users to gain a full licence and lower access ages for A2 and Full A licences. We propose access to 11kW motorcycles once a full AM (moped) licence is obtained and enable access to 22kW vehicles (previously only accessible via a full A2 licence) when a full A1 licence is acquired. We are not proposing the creation of a new L-Category vehicle, merely allowing access to slightly more powerful vehicles which will add an incentive to take the A1 test. This approach aims to reduce the number of permanent learners and promote the progressive licensing system, ultimately improving overall rider safety. **Specifically, we propose access to:**

▼ Age ▼ Proposed access

14		Low power, electric, light mobility vehicles at age 14 New vehicle and licence categories required
16		A1 (11kW) vehicles at age 16 with a full AM (Moped) licence
17		22kW vehicles at age 17 with a full A1 licence
18		A2 (35kW) vehicles at age 18 with a full A2 licence
20		A (unlimited) vehicles at 20 after having held a full A2 licence for 2 years and passing the ATB assessment to obtain a full A licence
21		A (unlimited) vehicles at 21 via Direct Access.



3

Proposal 3: All licence upgrades and access to L-Category vehicles up to 22kW to be carried out by a DVSA certified assessor. The instructor will be working within an Approved Motorcycle Training Body (ATB) and will undertake additional training to become a DVSA certified assessor.

To discourage perpetual learners and simplify the licensing process, a less burdensome route to a full AM or A1 licence through ATBs can be developed. Some users, especially those who may have special educational needs or English as a second language, currently have valid reasons for not taking a test. CBT is a less daunting option that can be easily obtained locally, without the associated costs and complexity of a test. MCIAs proposals aim to create a more accessible experience for these users which, in turn, results in more skilful users and improves road safety.

However, addressing the issue of perpetual learners within the current testing regime, would require a substantial increase in test capacity. Currently, there are approximately 57,000 Module 1 tests and 45,000 Module 2 tests conducted, while around 180,000 CBTs are issued annually. Less than 1,000 users take an A1 test each year. DVSA would need significant investment to accommodate the increased number of tests if users were mandated to take an A1 test after completing CBT. Limited availability of local DVSA multipurpose test centres also makes it inconvenient and costly for candidates and ATBs, who often must travel long distances. Motorcycle testing demand, especially during the summer months, surpasses the available capacity, resulting in extended waiting lists.

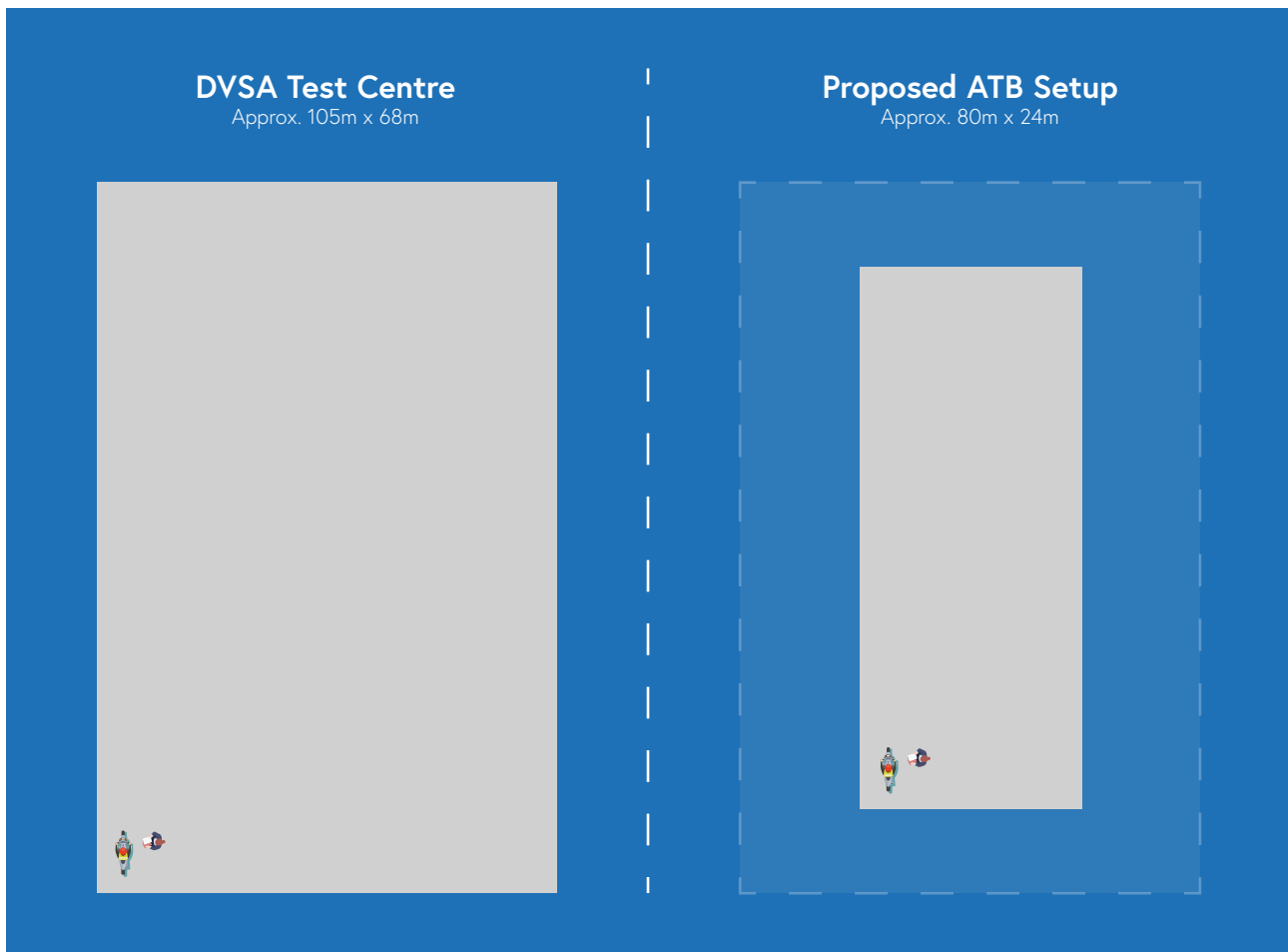
There are approximately 57,000 Module 1 tests and 45,000 Module 2 tests conducted, while around 180,000 CBT Certificates are issued annually

Requiring two separate tests exacerbates the problem, the large land area needed for Module 1 testing incurs disproportionate costs for DVSA. It is possible to complete some off-road testing manoeuvres, currently included in Module 1, before the on-road part of the test using smaller areas, similar to those used for CBT training. A single-event test would alleviate administrative burden on DVSA, reduce waiting lists, and lower costs to DVSA.

Many users with only a provisional licence are employed in the last mile delivery industry. To ensure safety, these users should, at minimum, complete a CBT and CBT Plus. Incentives could be explored to encourage them to obtain a full A1 licence with a DVSA certified assessor if they are riding for work in the delivery sector.

ATB instructors currently assess those with no prior motorcycle or road experience, and certify them as competent to ride unaccompanied on a moped or motorcycle up to 11kW for two years, on completion of a CBT assessment. These instructors should undergo additional training to become DVSA certified assessors, approved to carry out all licence acquisition for vehicles up to 22kW. These instructors currently train users to the required test standard, so will have no difficulty in identifying the appropriate competence level to grant the user a full AM or A1 licence. This would alleviate the burden on DVSA and provide easier access to licence acquisition with reduced cost, travel distances and waiting times. Alongside DVSA accreditation requirements for the assessors, MCIAs also recommends that ATBs offering licence acquisition assessment are subject to more stringent standards checks, and are monitored closely by DVSA to ensure the required standards are being maintained.

MCIAs proposes that direct access A2 or A category tests continue to be conducted by DVSA examiners by way of a single event test. However, when transitioning progressively from a full A2 to a full A licence, DVSA certified assessors from an approved ATB can safely facilitate the upgrade process and certify the user competent to receive a full A licence. Repeating identical Module 1 and 2 tests for progressive access does not raise riding standards or improve skills; it merely confirms that candidates meet the same required standard. Training and assessment by a DVSA certified assessor will enhance skill levels.



4 Proposal 4: CBT to be taken once, and valid for two years. After two years, users should take a new 'CBT Plus', valid for two years, to improve their skills rather than maintain their current level. After two years, users on CBT Plus will go on to take a final assessment carried out at their ATB to acquire a full licence.



Repeating the CBT syllabus every two years without any test requirement fails to enhance skills or motivate users to take a test. Currently, approximately 180,000 CBTs are issued annually, but only around 45,000 test passes are recorded.

MCIA proposes a more effective approach: Users should first take a Theory Test, then a one-time CBT course valid for two years, followed by a new CBT Plus course also valid for two years. On expiry of the CBT Plus, this should then be followed by an assessment carried out at a local DVSA Approved Training Body. Successful completion will grant the user a full AM or A1 licence as applicable.

A new syllabus should be developed for CBT Plus, adding additional skills to build upon the foundation skills gained during CBT training. The CBT Plus will move the user closer to full licence standard and will help prepare them for the assessment they must take before their CBT Plus certificate expires. Successful completion of the ATB assessment will grant the user a full AM or A1 licence.

Should users fail the ATB assessment, MCIA does not propose they be prohibited from riding. A mechanism for users to take training and return for assessment on previous areas of weakness only, can be developed, and timeframes to complete this built into legislation. To provide flexibility, users can choose to take the AM or A1 assessment at their preferred ATB at any time after completing their first CBT. For direct access to A2 or full A licences, a DVSA examined single part test is required.

For those who do not progress to take the AM or A1 assessment, they can re-enter the process from the point they left, but remaining on a provisional licence for more than four years will not be permitted, and after this point users must continue training until the licence standard is achieved.

5

Proposal 5: Returning to a single event test, instead of the current module 1 and module 2 tests

Current legislation mandates that candidates must pass two tests: Module 1 involves off-road manoeuvres on a large surface, taking about 10 minutes, while Module 2 consists of a 40-50 minute on-road ride. This format creates inconvenience and expense for candidates and ATBs, as they often must travel long distances to find available DVSA test centres. During summer months, the demand for PTW tests is high, resulting in longer waiting lists compared to car testing.

Requiring two separate tests worsens the problem and imposes disproportionate costs on DVSA for the off-road element of Module 1. However, if similar off-road manoeuvres were completed before the on-road portion of the test, using smaller areas like those used for CBT training, it would reduce the administrative burden on DVSA, shorten waiting lists, and optimise land usage.

Addressing the issue of perpetual learners under the current testing regime would necessitate a significant increase in test capacity. Currently, 180,000 CBTs are conducted annually, however, less than 1,000 users take the A1 test each year. The DVSA would require substantial investment to accommodate the increased number of tests if users were mandated to take an A1 test after completing CBT. Returning to a single test will also reduce this burden.

6

Proposal 6: A review of minimum test vehicle (MTV) and licence entitlements for all electric L-Category vehicles

MCIA is concerned about the suitability of MTV specifications and licence categories for electric L-Category vehicles. The current 11kW rating for A1 and 35kW rating for A2-Category vehicles allow for PTWs with faster acceleration and higher top speeds than their internal combustion engine (ICE) counterparts. However, there are currently no e-PTWs on the market that meet the test standards for the A category (above 50kW), which may deter users seeking a full A licence from choosing electric PTWs.

Furthermore, other electric three and four-wheeled L-Category vehicles cannot be used for training and testing purposes. As the market for small light electric vehicles grows, this situation poses risks to road safety and hinders the achievement of the Department for Transport's (DfT's) ambitious decarbonisation targets for transport. MCIA is willing to engage in further discussions and provide suggestions for more practical, and safer specifications to address this issue.

7

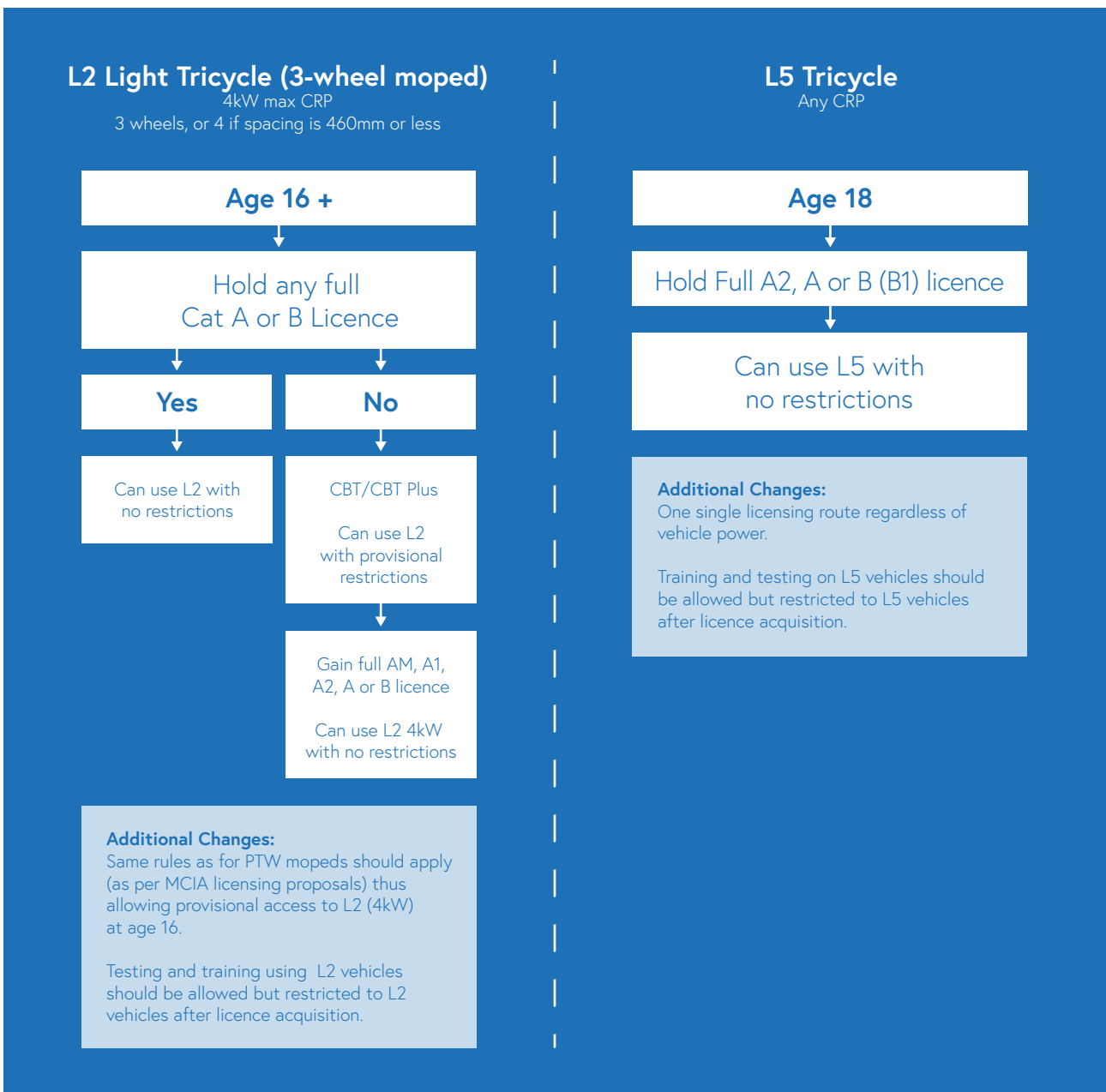
Proposal 7: A review of tricycle and quadricycle licensing & testing (L2, L5, L6 & L7) that retains current regulation entitlements, but allows for additional access under provisional licence restrictions. Age 16 for L2 and L6, and the introduction of direct access to L5 and L7 at 18 years of age.

As noted above, current regulations exclude training and testing on L2, L5, L6 and L7 vehicles. Not all users of these vehicles will wish to drive or ride a car or motorcycle so should not be mandated to use them to take a test. From a safety perspective there should be an option for users to train and test using their chosen mode of transport. This will become more important as the popularity of these vehicles increases in line with government's decarbonisation ambitions. MCIA recommends aligning the training, testing, and licensing regulations for L2 and

L6-Category vehicles with the L1 requirements (mopeds and speed pedelecs i.e., a higher powered electric bicycle). This would enable provisional access to these vehicles from the age of 16, following the same route as described for CBT, taken on the vehicle they wish to use.

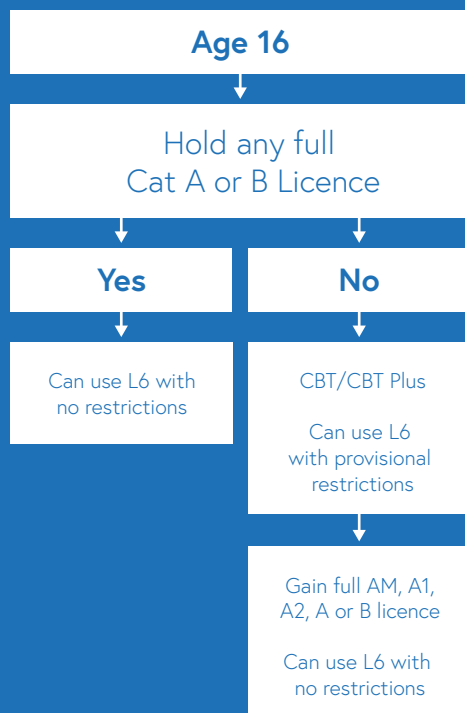


Regarding L5 and L7-Category vehicles, MCIA suggests allowing access from the age of 18, in line with our proposal for L3-A2 access. Furthermore, we advocate for a single licensing route regardless of vehicle power. Training and testing on L2, L5, L6 and L7-Category vehicles should be permitted with the licence holder restricted to vehicles within the relevant category after successfully acquiring a full licence.



L6 Light Quadricycle (4-wheel moped)

L6-A 4kW max CRP / L6-B 6kW max CRP



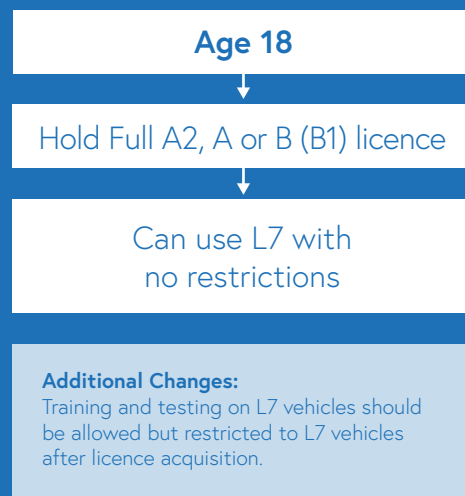
Additional Changes:

Same rules as for PTW mopeds should apply (as per MCIA licensing proposals) thus allowing provisional access to L6 (4kW) at age 16.

Testing and training using L6 vehicles should be allowed but restricted to L6 vehicles after licence acquisition.

L7 Quadricycle

15kW max CRP



Additional Changes:

Training and testing on L7 vehicles should be allowed but restricted to L7 vehicles after licence acquisition.

These proposals are subject to change, depending on the outcome of any new vehicle framework proposals during the transition to electric vehicles.

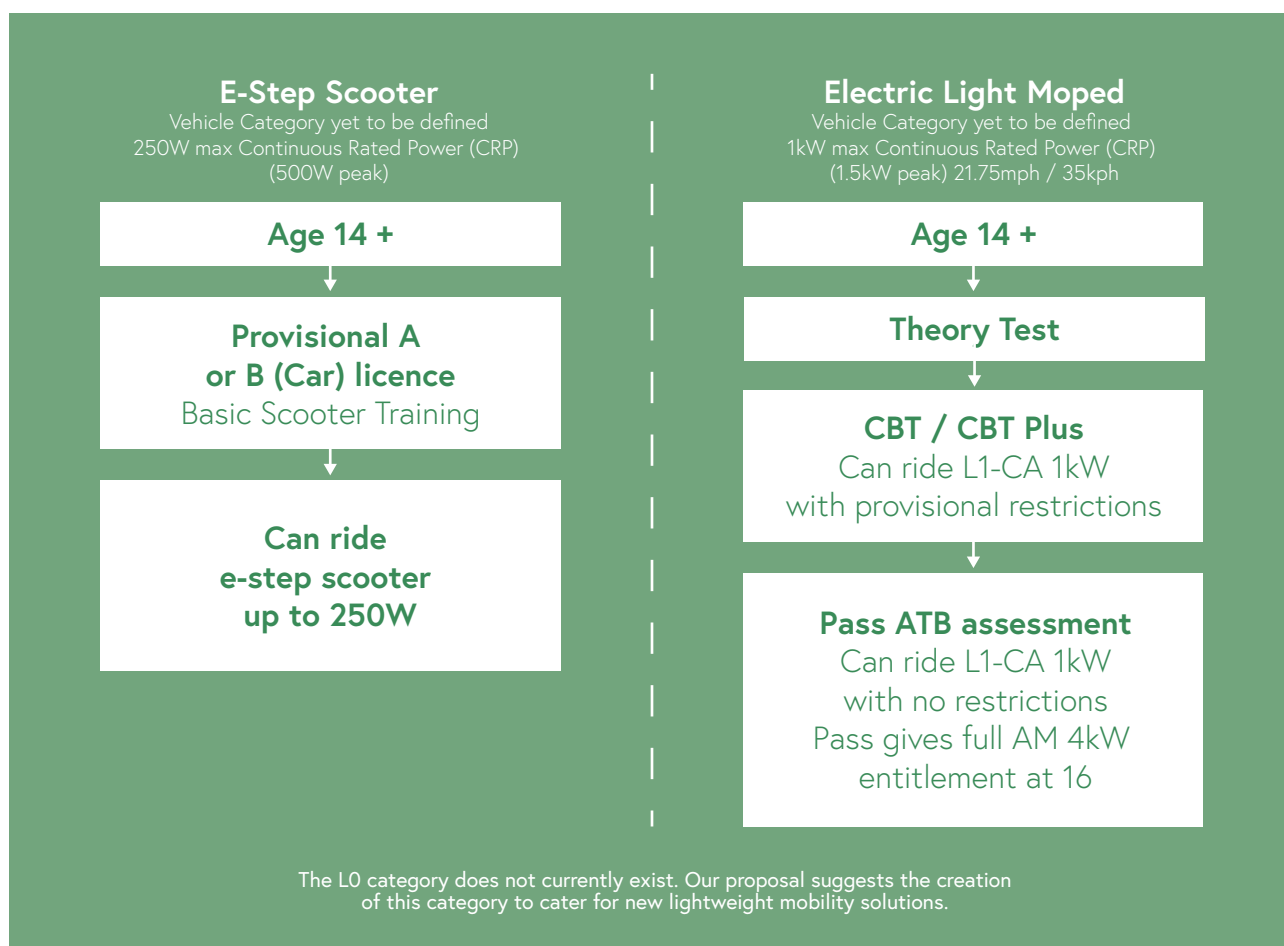
Proposed licence flow can be seen in Appendix One (PTWs) and Appendix Two (Tricycles and Quadricycles).

Appendix One

Proposed licensing flows – 2-wheeled vehicles (PTWs)

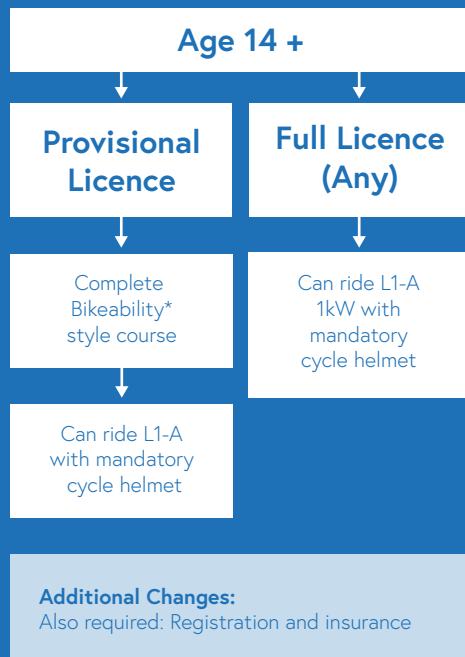
Whilst ICE vehicles are governed by a net power rating (maximum power that can be produced), EVs are currently only type approved against their continuous rated power (CRP). They also have a power rating termed as Peak power, which is not currently identified in legislation. Both the peak and CRP affect the potential performance of an EV, both during normal use and under harsher conditions (such as going up an incline). It is entirely possible for a low-CRP vehicle to operate at a peak power which is way in excess of that indicated by the CRP, albeit the duration of that peak power would be time limited (the EV system design governs the peak power value and the time duration of operation over the CRP value).

However, the peak power of EVs has not yet been fully discussed regarding the introduction into regulations which will support the full and proper integration of EVs into legislation and type approval processes. It is important that power ratings are properly defined in future legislation to ensure the safe use of EVs.



L1-A Pedelec Plus

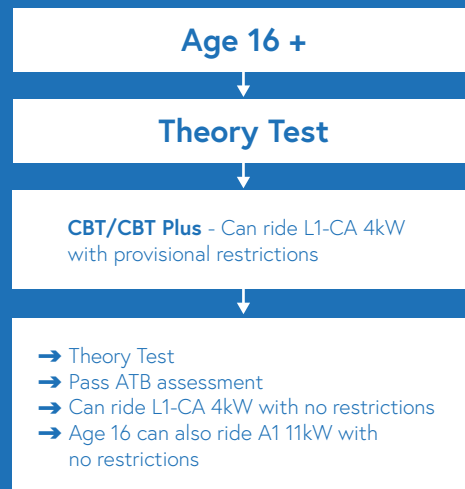
1kW max CRP



*Bikeability is the government's national cycle training programme, to help users learn practical skills and understand how to cycle on today's roads.

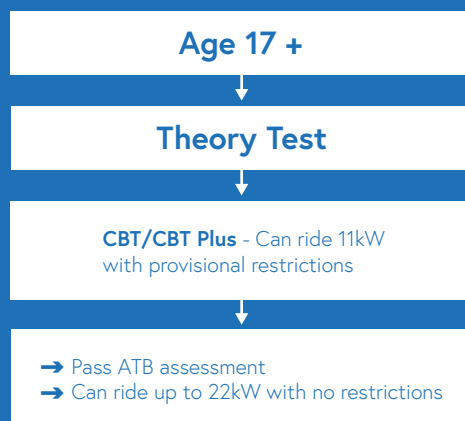
AM Moped

L1-B 4kW max CRP
30mph / 45km/h



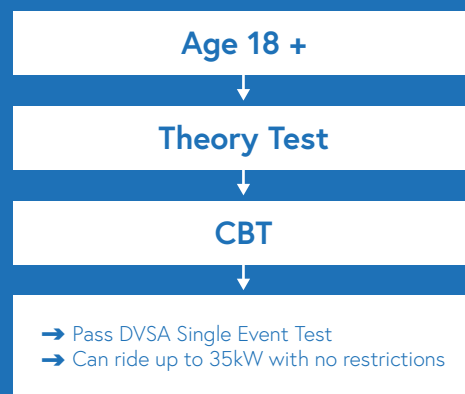
A1 Motorcycle

L3-A1 11kW max CRP



A2 Motorcycle

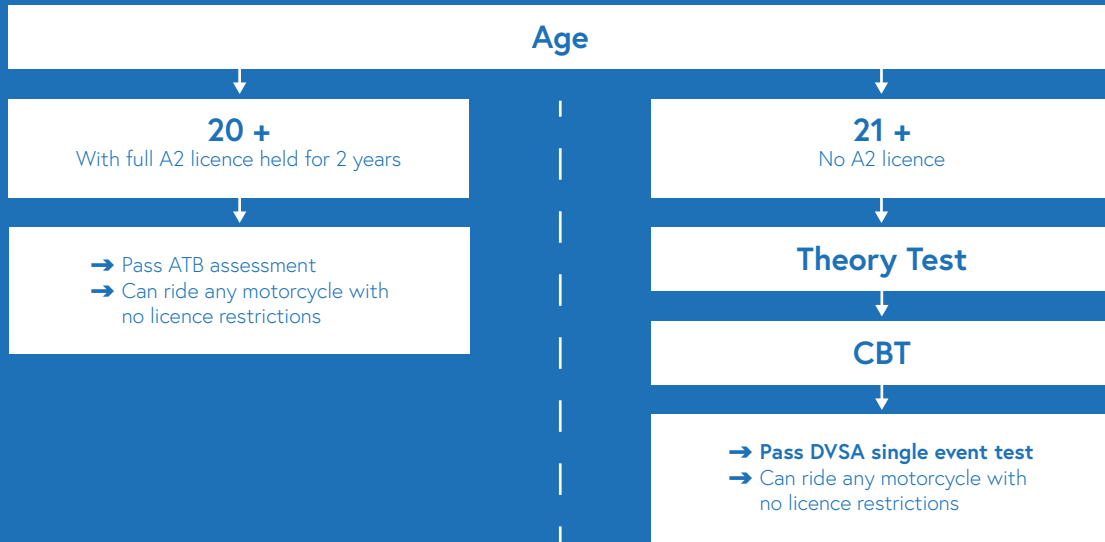
L3-A2 35kW max CRP



Full A Motorcycle

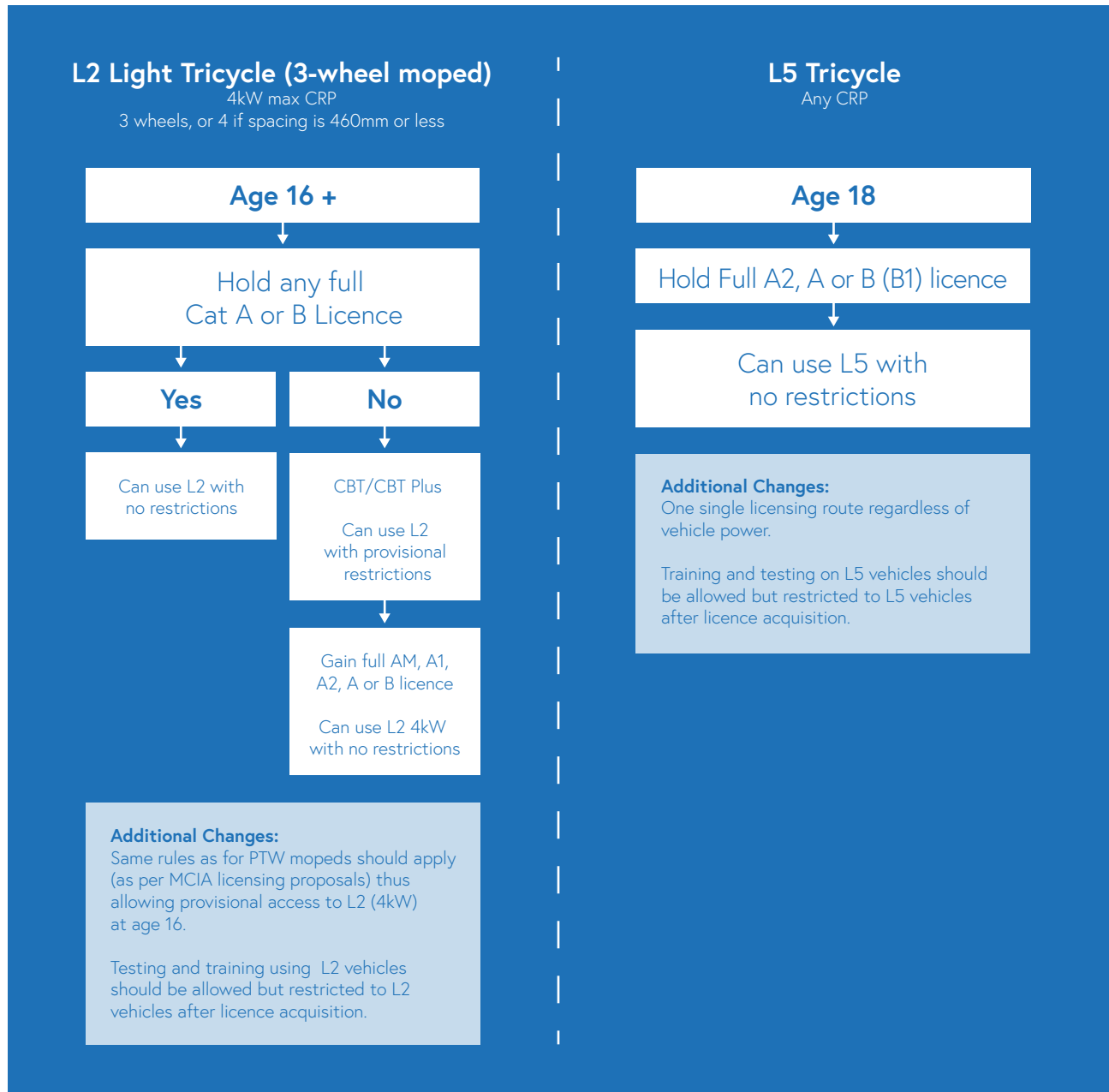
L3-A3 any CRP

Age



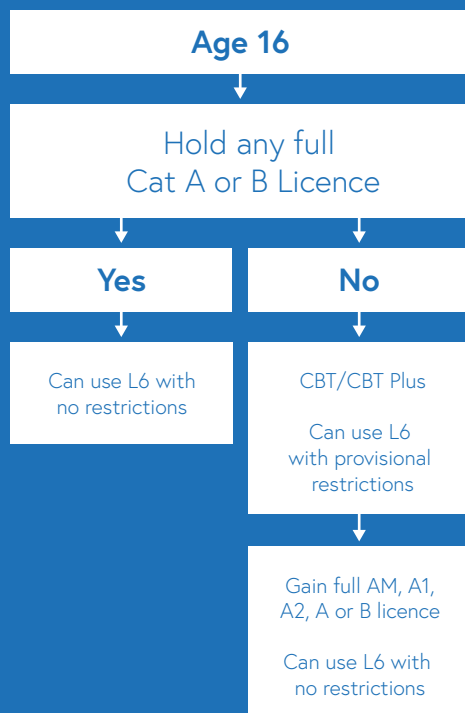
Appendix Two

Proposed licensing flows - tricycles and quadricycles



L6 Light Quadricycle (4-wheel moped)

L6-A 4kW max CRP / L6-B 6kW max CRP



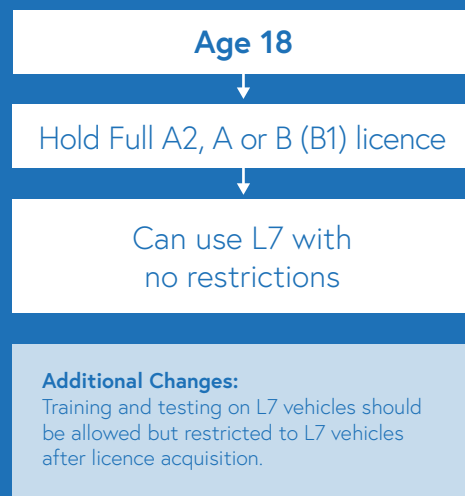
Additional Changes:

Same rules as for PTW mopeds should apply (as per MCIA licensing proposals) thus allowing provisional access to L6 (4kW) at age 16.

Testing and training using L6 vehicles should be allowed but restricted to L6 vehicles after licence acquisition.

L7 Quadricycle

15kW max CRP



Additional Changes:

Training and testing on L7 vehicles should be allowed but restricted to L7 vehicles after licence acquisition.

Glossary

A1 Licence - allows holder to ride PTW up to 11kW power (light motorcycle).

A2 Licence - allows holder to ride PTW up to 35kW power (medium power motorcycle).

A (Full) Licence - allows holder to ride PTW with any power (any size motorcycle).

AM Licence - allows holder to ride PTW up to 4kW power (moped).

ATB, Approved Training Body - Business approved by DVSA to carry out pre-test motorcycle training.

B(B1) Licence - Types of car licences

CBT, Compulsory Basic Training - is a course users must complete before taking a test or before using a moped (up to 4kw/50cc) or motorcycle (up to 11kw/125cc) unaccompanied on the road. Users only holding a CBT certificate, may not carry passengers and must display L plates. The CBT certificate is valid for 2 years.

CBT Plus, Compulsory Basic Training Plus - MCIA propose the creation of CBT Plus for those that have already completed CBT once. CBT Plus will give users additional skills that build upon the foundation skills gained during CBT training. This certificate would also be valid for two years.

CRP, Maximum Continuous Rated Power – a continuous power which refers to the maximum thirty minutes power at the output shaft of an electric engine (set out in UNECE regulation No 85).

Direct Access - Taking a motorcycle test without previously holding a licence for a lower powered motorcycle.

EV - Electric Vehicle, these are vehicles that are either partially or fully powered on electric power.

ICE - Internal Combustion Engine for example petrol and diesel cars.

L-Category - Light Motor vehicles with two, three or four wheels (as per UN Consolidated Resolution on the Construction of Vehicles (R.E.3)) including mopeds, scooters, motorcycles, tricycles and quadricycles.

Module 1 - The module 1 test takes place on a large off-road motorcycle manoeuvring area. The test normally takes about 15 minutes and includes: wheeling the moped or motorcycle and using the stand, riding a slalom, a figure of 8 and a slow ride.

Module 2 - The module 2 part of the test, takes place on the road. The DVSA examiner follows the rider on a variety of roads. This test lasts about 40 minutes.

MPTC, Multi-Purpose Test Centre - Large DVSA operated test centres where a variety of tests can be conducted. It has an area large enough to allow Module 1 testing for mopeds and motorcycles.

MTV, Minimum Test Vehicle - Any vehicle used to take a test must comply with the MTV specification for power and/ or weight.

Peak Power - The peak power is the maximum amount of power the electric motor can consume for a short period of time.

Perpetual learners - Users that repeat CBT every two years and remain on a provisional licence.

PLV Powered Light Vehicle - A collective term including mopeds, scooters and motorcycles, as well as all segments that are covered within the EU L-Category regulations.

Progressive Access - A process that allows a user to obtain earlier access to a higher powered PTW if they already have at least two years' experience on a lower-category motorcycle.

PTW Powered Two-Wheeler - A collective term for mopeds, scooters, and motorcycles.

Single event test - A licence acquisition test where both on road and off-road manoeuvres can be tested during one single test.

Two-part test - The current PTW testing regime includes two tests which must be booked and taken separately - Module 1 and Module 2 (see above).



For further information, please contact:

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