

Revision of the Directives of the Roadworthiness Package– from a Swedish perspective, reply from Sveriges MotorCyklister, SMC

The reason for the revision is that the Commission wants to increase safety and reduce emissions from vehicles.

Exhaust missions

Emissions have never been tested on motorcycles in Sweden. The reason is simple, there is no method to measure exhaust emissions from motorcycles. This fact makes an introduction of compulsory Periodic Technical Inspektion, PTI, for motorcycles and mopeds irrelevant and unnecessary.

PTI for motorcycles in Scandinavia

Sweden has had PTI for motorcycles since 1965 when it was made compulsory for all motor vehicles. Mopeds have always been excluded from PTI. Sweden is the only country in Scandinavia with PTI for motorcycles. Sweden is a country where the road safety figures are among the best in the world. However, this doesn't mean that the motorcycles are safer in Sweden. It doesn't show in the fatality figures. It is actually safer to ride a motorcycle in Finland, Denmark compared to Sweden in spite of the fact that we have had PTI for motorcycles since 65.

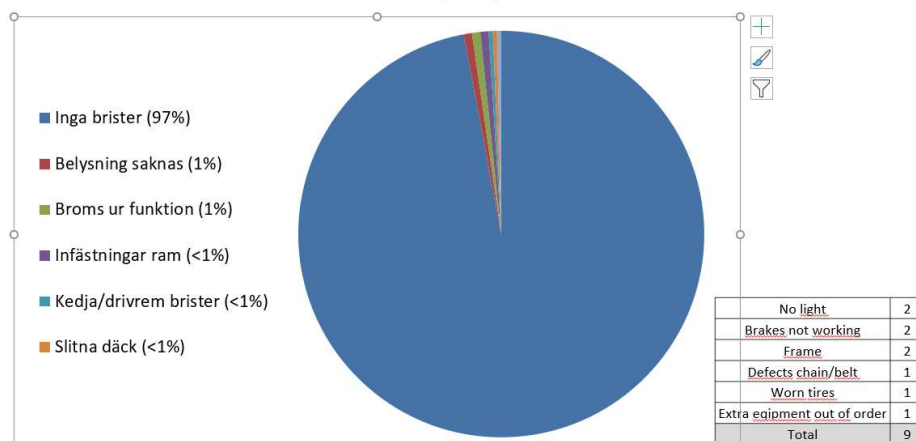
Risk of being killed on a motorcycle in Scandinavia

Country	2018	MEDIAN VALUE 2013–2018
Norway	7,32	10,55
Denmark	9,60	11,36
Finland	8,60	6,73
Sweden	14,36	12,41

Motorcycle accidents due to technical failures

SMC has been able to look at the in-depth studies for 30 years. There are hardly any accidents where a technical failure was the main reason (this figure is also attached). There hasn't been any new collections since 2012 because this is not a problem in Sweden.

Technical failures with an effect on the accident in fatal motorcycle accidents in Sweden 2005-2011 (341)



Technical defects on the motorcycles had a major effect in 3 % of all fatal accidents

Källa: Trafikverkets djupstudier av dödsolyckor

Motorcycles are best in test – in spite of less tests

In 2004 the parliament decided to limit the tests for motorcycles, trailers and caravans. The first test would be when the motorcycle is four years old and then every second year. cars are tested after two years, then every year.

SMC has evaluated the failure rate after this decision and it is obvious that regardless of PTI, the motorcycles were kept in good condition. Motorcycle owners are well aware of the need to keep the bike safe to ride.

Year	Motorcycle	Trailer	Caravans	Cars
2004	9%	19%	16%	32%
2005	9%	22%	13%	32%
2006	10%	26%	22%	32%
2007	10%	26%	19%	32%
2008	10%	25%	22%	30%
2009	10%	26%	26%	29%
2010	9%	24%	24%	29%
2011	9%	25%	25%	31%
2012	10%	24%	19%	31%

Recent figures 2018-2020 from PTI in Sweden

The big problems when it comes to vehicles in a poor condition is not among motorcycles. It would probably be much better for both safety and environment to check cars, buses and lorries more often instead. These are the figures from the PTI in Sweden the last three years.

Vehicle	2020	2019	2018
Heavy trailer	43	44	47
Heavy lorry	41	44	45
Light lorry	29	32	31
Trailers/caravans	23	23	23
Car	22	24	24
Heavy bus	21	25	26
Motorcycle	10	9	9

Compulsory PTI for mopeds – a nightmare for safety at huge costs

Today there are two kind of mopeds in Sweden. The registered ones (45 km/h class I) and the unregistered ones (25 km/h). Neither of these two have to do PTI. There are about 100 000 registered moped class I, there are about 210 000 unregistered moped class I and there are about 75 000 unregistered moped class II in Sweden. If EU would force Sweden to introduce PTI for them it means that:

- The Swedish Transport Agency have to come up with a solution to include a huge numbers of vehicles in the vehicle register at a huge cost (€150/vehicle)
- about 75 000 moped owners would have to do a single vehicle type approval test to register it. This will take a long time.
- A huge part of these vehicles are oldtimers and it will not be possible to find the vehicle documents and receipts from 50-60 years ago. Many mopeds will then become illegal.
- Riders can only use the mopeds in the summer and this is the part of the year when it is most difficult to find time for test.

- If and when the 75 000 moped class II owners have got a number plate and been approved and included in the register, he/she will have to book a time for PTI. This will also take time.
- Then there are another about 300 000 mopeds class I that would have to book a PTI during the period when there are hardly any times for tests.
- We have huge distances. In parts of Sweden the moped owners will have 200-400 km to the PTI station.
- To force young and old moped owners to ride for several days to come to a station for PTI on roads with a lot of traffic and no dedicated bicycle and moped lanes for them will increase the risk of severe accidents a lot.
- Imagine sending your 15 year old daughter for two days on a road with no road side where she will travel in 45 km/h with lorries, cars, campers, motorcycles, buses etc!
- Imagine that you have to book a hotel room for your 15 year old daughter in a town where she's never been because she can't make the long journey back in one day.
- The persons who came with this proposal doesn't know the geography in Europe and doesn't seem to understand that we have a long winter when it will be impossible to do PTIs.
- The costs for starting a system like this is enormous for the entire society and the owners with an outcome that won't increase safety at all. It will create a bureaucracy that isn't needed to improve safety or emissions.
- There is a problem with tampered mopeds but this can be solved in other ways – road side checks, visits to schools and look at the mopeds, make the mopeds impossible to tamper etc.

Most common faults in PTI

The most common faults where the motorcycle owner had to come for a second test are noise, chain, brakes, fairings and reflex at the back. Most of these faults aren't a threat to the lives of the motorcycle owners.

Read the report from Bilprovningen (on of the PTI companies in Sweden).

https://www.svmc.se/smc_filer/SMC%20centralt/Maria/Bilprovningen_mcstatistik_20100127.pdf

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