



# MOTORCYCLE LICENSING

## PROPOSALS TO PROTECT MOTORCYCLISTS

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### OUTCOMES FROM THE PUBLIC CONSULTATION

October 2013



Government of South Australia

Department of Planning,  
Transport and Infrastructure



# EXECUTIVE SUMMARY

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In total, 443 submissions on the Motorcycle Licensing Discussion Paper were received, predominantly through the web online feedback form (388 or 88% of submissions were received online). The remaining 55 submissions comprised 32 email and 23 hardcopy written submissions (including 13 from road safety stakeholders and other organisations, 2 from Local Government, 2 from Members of Parliament, and 15 from motorcycle rider groups or industry).

Among the South Australian public respondents who provided their postcode, 82% live in metropolitan Adelaide while 18% live in rural areas of the State. This compares to 74% of the population living in Metropolitan Adelaide and 26% living in rural areas<sup>1</sup>. In relation to age, 86% of respondents are older than 26. The majority possess a full driver's licence with a R class or R-date endorsement, and 92% are male.

## Car licence before motorcycle learner's permit

Among the public submissions, 31% of respondents were deemed to support the proposal to require a car licence before a motorcycle learner's permit. On the other hand, 59% of respondents were deemed to be non-supportive of the proposal. In 10% of cases, it was not clear if the respondent supports or does not support the proposal. Those making supportive comments largely pointed out the safety benefits, tending to say "they agree" that having experience on the road and learning the road rules and getting an understanding of road safety hazards in a car before riding a motorcycle would be a "good idea". Those making non-supportive comments tended to view this proposal as restricting mobility and unlikely to reduce motorcyclist road trauma. The remaining online respondents either did not make a comment on this proposal or it was not clear whether their comments were supportive or not.

There was divided support for this proposal among road safety and other organisations, but almost all the motorcycle rider group and industry submissions were deemed non-supportive. Supportive comments were almost entirely based on anticipated safety benefits, whereas non-supportive comments often considered

the proposal a disincentive to take up motorcycling, queried the evidence justifying it, and/or offered an alternate view that novice car drivers who learn to ride a motorcycle first will make better car drivers.

## Six months between Basic and Advanced Rider Safe

Among the public submissions, 50% were deemed to be supportive, 35% were deemed non-supportive and in 15% of cases it was not clear if the respondent supports or does not support the proposal. Supportive comments tended to stress the importance of novice riders increasing their on-road experience. Those making non-supportive comments tended to think that advanced training should be done as soon as possible.

This proposal was supported by the vast majority of road safety stakeholders and other organisations, motorcycle rider groups and industry and across the other written responses. Most of these respondents considered the proposal intuitively sensible in terms of the experience likely gained, though some cautioned that making a six month intervening compulsory period will not guarantee that novice riders will necessarily gain more experience in this time.

## Zero BAC for R-Date riders

Among the public submissions, 71% were deemed to be supportive, 19% were deemed non-supportive and in 10% of cases it was not clear if the respondent supports or does not support the proposal. The supportive comments tended to simply be "agree", "yes", "OK", "great idea", "absolutely" and "definitely", while those making non-supportive comments tended to think that people who drink and ride would probably do so regardless of any legislative changes.

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<sup>1</sup> Based on Australian Bureau of Statistics - Estimated Resident Population by Statistical Division, South Australia, Regional Population Growth, Australia, 2010 (cat. No. 3218.0).

Road safety and other stakeholders plus motorcycle organisations and industry and other submissions all overwhelmingly support the proposal, with a few suggesting a zero BAC should apply to all motorcyclists.

### Licensing and training for riders of mopeds

Among the public submissions, 69% were deemed to be supportive, 17% were deemed to be non-supportive and in 13% of cases it was not clear if the respondent supports or does not support the proposal. Those making supportive comments tended to say “about time”, “yes”, “essential”, “absolutely” and “definitely”, with additional comments often regarding poor moped rider road skills and behaviour, and lack of protective clothing.

The vast majority of road safety and other organisations plus a majority of motorcycle organisations and industry and a majority of other submissions all support the proposal. The supportive comments often went into substantial detail about safety issues surrounding untrained moped riders. Some non-supportive comments concerned the potential impact on retailers/hirers of mopeds.

### Pillion passenger ban on R-Date

Among the public submissions, 64% were deemed to be supportive, 22% were deemed to be non-supportive and in 14% of cases it was not clear if the respondent supports or does not support the proposal. Those making supportive comments tended to say things like “agree”, “positive move”, “has merit”, “good idea” and “well overdue”, with more detailed comments pointing out how carrying a passenger affects a novice rider’s capabilities in controlling the motorcycle.

All responding road safety and other organisations, together with a majority of motorcycle organisations and industry and a majority of other submissions all support the proposal. Their comments tended to echo those of the online supportive respondents. Some non-supportive comments suggested learning to carry a pillion passenger was a worthwhile experience.

### Explore options for a Motorcycle Safety Fund

Among the public submissions, only 20% were deemed to be supportive, 65% were deemed to be non-supportive and in 15% of cases it was not clear if the respondent supports or does not support the proposal. Those making supportive comments tended to say they agree having a motorcycle safety fund to address motorcyclist specific hazards would be a “good idea”. Other supportive comments said spending the funds should be overseen using expert motorcycling input, and/or that the funds should be used to reduce rider training fees and to educate drivers about motorcyclists. Those making non-supportive comments tended to say “strongly disagree” and indicated that the proposal was “discriminatory”, “unfair”, “another tax grab”, “riders being singled out” and “punishment”. Other comments suggested that all motorised road user groups should contribute to the funding of road safety initiatives, or pointed out benefits of motorcycling in terms of the environment and reduction in traffic congestion.

This proposal is supported by nearly all the road safety and other organisations, but not supported by any of the motorcycle rider groups or industry. The supportive comments tended to echo those of the online respondents, including with suggestions as to how the funds should be spent. Many of the non-supportive comments presume that a South Australian fund would be raised through a levy similar to the Victorian model and were critical of how the Victorian funds have been spent. Other non-supportive comments reflected those made in the online submissions, although some of these indicated they would support a funding model based on fine revenue from traffic offences committed by motorcyclists.

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# ----- BACKGROUND TO THE DISCUSSION PAPER -----

Motorcycle riders are almost 30 times more likely to be killed in a crash than drivers of other vehicles, per billion kilometres travelled.

In 2012, 94 people died on South Australian roads, 15 of these were motorcyclists. Over the last decade, 168 motorcyclists were killed and 1608 were seriously injured on the State's roads.

The *Motorcycle Licensing — Proposals to Protect Motorcyclists* Discussion Paper was released for public consultation on 19 September 2012.

The public consultation period lasted eight weeks, concluding on 16 November 2012. The Discussion Paper outlined the following six proposals aimed at reducing motorcyclist road trauma:

- 1. Requiring a car licence to be held for at least 12 months before being eligible to apply for a motorcycle learner's permit**
- 2. A compulsory six month period between the Basic and Advanced Rider Safe training courses**
- 3. Require all licence holders endorsed with R-Date to have zero blood alcohol concentration (BAC) while riding a motorcycle**
- 4. Introduce specific licensing and training requirements for riders of mopeds**
- 5. Riders with an R-Date licence endorsement (including riders of mopeds) to be banned from carrying a pillion passenger**
- 6. Explore options for a Motorcycle Safety Fund dedicated to motorcycle safety initiatives to address high and disproportionate risks.**

The Discussion Paper was based on national and international research such as the Monash University Accident Research Centre 2005 report: *Review of Motorcycle Training and Licensing* and the European Transport Safety Council 2008 report: *Vulnerable riders: Safety implications of motorcycling in the European Union*.

The proposed initiatives are not designed to make life tougher for novice riders. They are about providing a licensing pathway that would likely result in fewer deaths and injuries among young riders, their pillion passengers and other road users in South Australia.

The Discussion Paper was released by the former Minister for Road Safety, Hon Jennifer Rankine MP, on 19 September 2012 for an eight week public consultation period ending on 16 November 2012.

A variety of communications were used to promote public and stakeholder organisation participation in the Discussion Paper consultation process:

- > The Discussion Paper was available from the website [sa.gov.au/towardszerotogether](http://sa.gov.au/towardszerotogether), or by phoning the Department of Planning, Transport and Infrastructure (DPTI).
- > The former Minister for Road Safety, Hon Jennifer Rankine MP, was available to the media for interviews throughout the consultation period.
- > Print advertising was placed in *The Advertiser* (22 September & 17 October 2012) and the *Sunday Mail* (14 October 2012) to raise general public awareness of the opportunity to provide comment.

- > Digital advertising was placed on selected websites to promote the opportunity to provide comment online.
- > Advertising banners were placed on Government websites to further raise awareness of the availability of the Discussion Paper and encourage members of the public to 'have their say'.
- > Government social media sites, including DPTI Facebook, *Towards Zero Together* Facebook and My Licence Facebook, were used to further raise awareness of the availability of the Discussion Paper and opportunity to comment.
- > Letters were sent directly to key stakeholder organisations and groups, including Members of Parliament, and those representing motorcycle riders and road safety interests, to advise of the release of the Discussion Paper and opportunity to comment.
- > Key stakeholders were also invited to a briefing session forum on 25 October 2012 at DPTI, 77 Grenfell Street, Adelaide, to hear a presentation on the proposed initiatives by Ms Julie Holmes, Executive Director, Road Safety, Registration and Licensing, DPTI, and to ask questions.

# THE PUBLIC CONSULTATION PROCESS

The public consultation process was essentially an online feedback facility, whereby the public were invited to enter and submit responses to the six proposals via the *Towards Zero Together South Australia's Road Safety Strategy 2020* website.

In total, 443 submissions were received, 411 of these were received from the public. 388 were online and 23 were written.

## Online responses (388)

### Submissions from Road Safety Stakeholders and other organisations (13)

- > Australian Medical Association (AMA) (SA) Road Safety Committee and the SA Trauma Committee of the Royal Australasian College of Surgeons (RACS) (jointly)
- > Australian Road Research Board (ARRB) Group Ltd
- > Australian Driver Trainers Association (SA) Inc (ADTA)
- > Business SA
- > Centre for Automotive Safety Research (CASR)
- > Director-General Community Safety (SA Government's new Community Safety Directorate)
- > Country Fire Service Volunteers Association (CFSVA)
- > Federal Chamber of Automotive Industries (FCAI)
- > Motor Accident Commission (MAC)
- > Royal Automobile Association of SA Inc (RAA)
- > SA Country Fire Service (CFS)
- > SA Farmers Federation (SAFF)
- > South Australia Police (SAPOL)

## Local Government Submissions (2)

- > District Council of Grant
- > Wattle Range Council

## Members of Parliament (2)

- > Hon John Hill MP (former Minister for Health and Ageing)
- > Hon Ian Hunter MLC (former Minister for Youth & Minister's Youth Council)

## Motorcycle Rider Groups / Motorcycle Industry (15)

- > Australian Motorcycle Council (AMC)
- > Garage Motorcycles
- > Harley Heaven
- > Honda Australia
- > Hyosung Australia
- > Italian Motorcycles
- > Motorcycle Riders Association of SA Inc (MRA)
- > Motorcycling South Australia Inc (MSA)
- > Peter Stevens Motorcycles (Adelaide & Morphett Vale)
- > Piaggio Australia
- > Suncorp Group Limited (InsureMyRide)
- > Triumph Australia
- > Ulysses Club Inc
- > Women's International Motorcycle Association (WIMA)
- > Zoot Scooters and Bikes Pty Ltd

## Written (hardcopy) responses/submissions (23)

- > Includes Ministerial correspondence (10), hard copies of feedback forms received (8) and emails sent directly to DPTI's road safety mailbox (5).



# DEMOGRAPHIC PROFILE OF RESPONDENTS

While not compelled to do so, respondents were asked to provide some basic demographic data. The 411 public submissions are summarised as follows:

## Location

Most respondents provided their postcode and the majority of these reside in the Adelaide metropolitan area. Submissions from 5.6% of respondents did not include a postcode or came from outside South Australia.

Table 1 - Location

Postcode range	General Location	Response Per cent	Response Count
5000-5199	Metropolitan Adelaide & surrounds	77.4%	318
5200-5299	South East (Mt Barker to Mt Gambier)	8.3%	34
5300-5399	Riverland, Mallee, Barossa	2.7%	11
5400-5499	Mid North	1.2%	5
5500-5599	Mid North & Yorke Peninsula	1.2%	5
5600-5699	Eyre Peninsula	1.2%	5
5700-5749	Far North	2.4%	10
Unspecified or outside of SA		5.6%	23
<b>Total</b>		100%	411

## Age

The Discussion Paper attracted responses from mainly older age groups: 77.4% of responses came from those aged 41+ years and 92.7% of respondents are aged 26 or older, with people aged 25 or under only contributing 3.9% of submissions.

Table 2 - Age

Age	Response Per cent	Response Count
15 or under	0	0
16-19 years	1.0%	4
20-25 years	2.9%	12
26-40 years	15.3%	63
41+ years	77.4%	318
Unspecified	3.4%	14
<b>Total</b>	100%	411

Respondents aged over 41 years are predominantly in the 41-60 year age group with only 27 responses (6.6%) from people aged 61 or older.

## Gender

Most respondents (91.7%) are male.

Table 3 - Gender

Gender	Response Per cent	Response Count
Male	91.7%	377
Female	8.3%	34
<b>Total</b>	100%	411

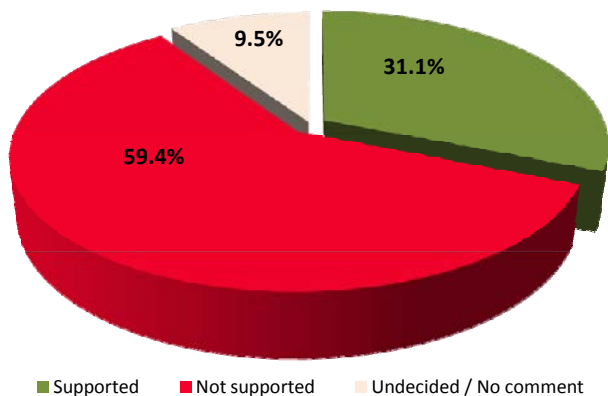
# FEEDBACK ON PROPOSALS – PUBLIC SUBMISSIONS

The following summary samples the range and depth of online feedback received rather than attempting to incorporate every single comment.

## 1. Requiring a car licence to be held for at least 12 months before being eligible to apply for a motorcycle learner’s permit.

Figure 1 shows that 31% of the 411 public (388 online + 23 hardcopy written) submissions were deemed to be supportive of requiring a car licence to be held for at least 12 months before being eligible to apply for a motorcycle learner’s permit, 59% were deemed to be non-supportive and in 10% of cases it was not clear if the respondent supports or does not support the proposal.

Figure 1 - Car licence required for 12 months before motorcycle licence



Public respondents making supportive comments tended to say “they agree” that having experience on the road, learning the road rules and getting an understanding of road safety hazards in a car before riding a motorcycle would be a “good idea”. Supportive comments largely pointed out the safety benefits of the proposal and included:

- > “will discourage people from jumping on bikes straight out onto the roads”
- > “there are far too many riders who are new to the roads and don’t know what to look out for”
- > “motorcycling is more complex than driving so while someone is trying to become proficient in the skills of motorcycling while also trying to assimilate all road rules means that the learner/new motorcyclist is trying to deal with too many variables”
- > “will teach the prospective rider the lack of visibility from a car to see motorcyclists, making them a more defensive rider”
- > “motorcycles are an expensive form of transport when you factor in appropriate protective gear: this proposal may stop young people riding cheap motorcycles without safe protective clothing (tailored leathers etc.)”
- > “would provide an opportunity for young drivers to realise how difficult it is at times to “see” motorcyclists or adequately anticipate what some motorcycle riders are about to do; also gives them time to develop situational awareness, which is so important in surviving most motorcycle journeys”

- > “a car is more forgiving if you make a mistake and new drivers need time to acquaint to the real world”
- > “several years [before getting a motorcycle learner’s permit] would be better”.

Those making non-supportive comments tended to view this proposal as restricting mobility and unlikely to reduce motorcyclist road trauma. Non-supporting comments included:

- > “should be the other way around so that all prospective car drivers get to experience and appreciate the life of a motorcyclist”
- > “skills learned in the first 12 months of driving a car do not transfer well to riding a motorcycle”
- > “this prevents young people choosing a cheaper, greener form of transport”
- > “car licensed drivers are the issue: driver training should include better road sharing instruction”
- > “riding encourages good habits due to a rider’s vulnerability, driving encourages complacency and complacency is deadly for riders; by forcing riders into a situation where they will learn complacency is a stupid move”
- > “a responsible government should be encouraging motorcycling as it leads to lower pollution levels and less congestion in our roads”
- > “this is restrictive and discriminatory to country people and all people’s choice of vehicle”
- > “education is the key, and currently we do not educate car drivers to be aware and look out for motorcyclists”
- > “moving the eligible age back to 18 only means there will be more inexperienced 18 year olds riding”
- > “starting out with a moped and progressing to either a provisional car or bike licence would teach all road users respect for each other”
- > “more kids are now getting experience from off-road and track motorcycle work before they are eligible to obtain a motor vehicle licence, so they may be better riders before they are good drivers”

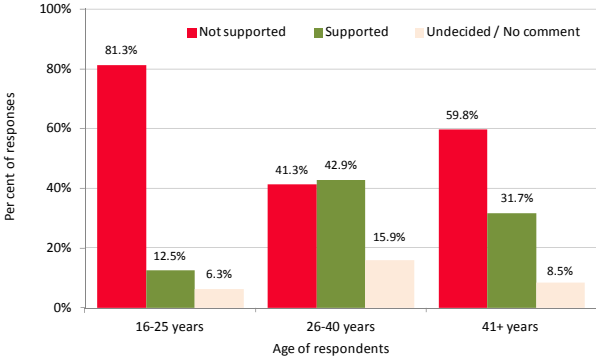
- > “scooters and small motorcycles are cost effective, more environmentally sound and possibly safer than cheap old cars”
- > “a better idea would be to raise the age to 18 before you get a learners for a bike and have to do 12 months on that then 12 months each on P1 and P2”.

The remaining respondents either did not make a comment about this proposal or made a comment that was neither clearly for or against the proposal:

- > “good for those who have a car to use for 12 months, not so good for those that have to wait 12 months before they are allowed to ride a bike”
- > “unaware car drivers kill other people, unaware motorcyclists kill only themselves”
- > “train car drivers who have foggy mirrors and think motor bikes won’t hurt them”
- > “this is a sensible move for full sized motorcycles however, I think a moped class licence should be introduced”
- > “there should be exemptions for those on rural properties that require motorcycles for working on the land”
- > “allow motorcycles down bike lanes”
- > “it is generally accepted elsewhere that if you ride a two-wheeler for 6 to 12 months before gaining any other licence, that you will end up a better driver. French teenagers are allowed to ride mopeds unlicensed from age 14”
- > “this proposal may well have an objective of seeking to engage young people with cars first so that fewer of them ever become engaged with motorcycles and if this is a true objective then this should be made clear and discussed as part of the case for the proposal so the success of that as an outcome could be considered by readers of the document”
- > “the proposal fails to address the issues raised, and directly contradicts the far deeper and wider understanding of the road and environment that riding a motorcycle teaches”.

Only 3.9% of public submissions were made by respondents aged under 26 years and the majority of these people did not support the proposal to hold a car licence before a motorcycle licence. Online respondents in the older age groups were more supportive as indicated in Figure 2.

Figure 2 - Proportion of public responses to car licence before motorcycle licence proposal by age group

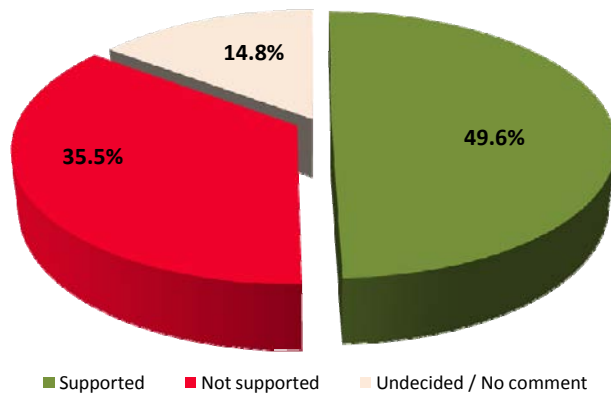


## 2. A compulsory six month period between the Basic and Advanced Rider Safe training courses.

Under this proposal, a minimum six months of continuous learner's permit conditions would exist between the Basic and Advanced Rider Safe courses, which would be more consistent with existing graduated licensing provisions.

Figure 3 shows that 50% of the 411 public submissions were deemed to be supportive of requiring six months between the Basic and Advanced Rider Safe training courses, 35% were deemed to be non-supportive and in 15% of cases it was not clear if the respondent supports or does not support the proposal.

Figure 3 - Six month period between the Basic and Advanced Rider Safe training courses



Supportive comments tended to stress the importance of novice riders increasing their on-road experience and included:

- > “allowing skills and poor habits to develop, then coming back to have the skills honed and poor habits corrected is valid and useful”
- > “allows for consolidation of theory and practice”
- > “six months would allow riders to practise and master the basic skills before they move on to advanced rider training”
- > “basic experience is needed before advanced training”
- > “nothing replaces experience and the display of an “L” plate can assist with rider safety and ensuring they have some kms of experience before they undertake their final test”.

Those making non-supportive comments tended to think that advanced training should be done as soon as possible. Common comments were:

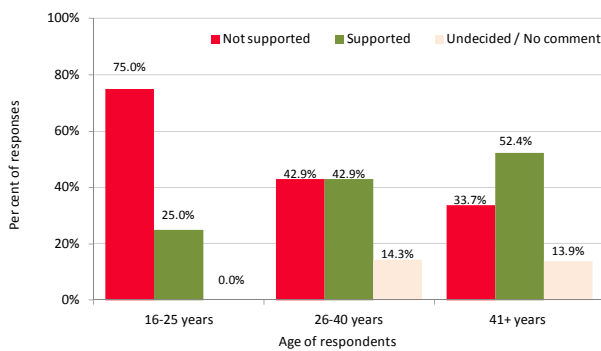
- > “the sooner a rider does their Advanced rider safe training course the better and safer they are”
- > “it should be a mandatory amount of actual on-road experience not a time limit”
- > “bring it back to three months minimum”
- > “it would be more appropriate to have a maximum period of 6 months to complete all levels of Rider Safe Training”
- > “should be 1 year, so they can learn to ride in all seasons”
- > “should be longer and an on road test/assessment should be part of the transition from learner’s permit to R-Date”
- > “there is no need for a six month gap; riders will progress when they are comfortable and competent”
- > “an arbitrary timeframe doesn’t mean actual experience on the road; one rider may travel 100 kms in this time, another 10,000 kms. It is more important to complete the courses successfully”.

Public responses where it was not clear whether the proposal is supported or not included:

- > “those courses don’t teach half of the skills needed to survive anyway”
- > ”I find it hard to believe that novice riders can slip through the advanced course undetected and pass”
- > “final test should include on the road test”
- > “surely a case by case scenario”
- > “not sure if this proposal would work”
- > “a compulsory six-month period between basic and advanced rider training may not be enough if you factor in weather, work and personal use”.

Only 3.9% of public submissions were made by respondents aged under 26 years and the majority of these people did not support the proposal to spend six months between the Basic and Advanced training courses. The respondents in the 26-40 year age group were evenly divided while older age groups were more supportive as indicated in Figure 4.

Figure 4 - Proportion of responses to six months between training course proposal by age group

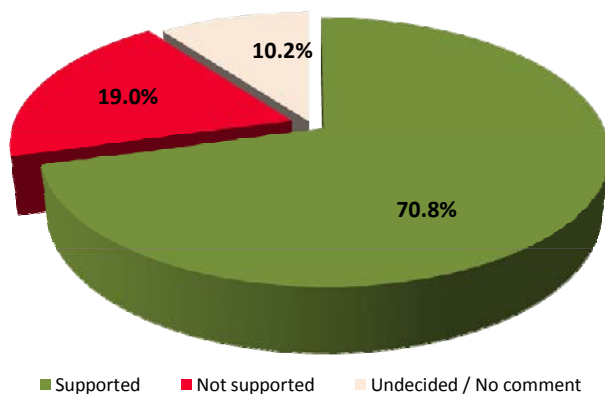


### 3. Require all licence holders endorsed with R-Date to have zero blood alcohol concentration (BAC) while riding a motorcycle.

Alcohol impairs a person’s ability to ride safely. It affects judgement, vision, coordination and reflexes and increases the risk of having a crash. Riders who have an R-Date licence endorsement may have limited on road riding experience and limited defensive riding skills. It is proposed that R-Date riders cannot ride with any concentration of alcohol in their blood or saliva. This would make the zero blood alcohol concentration (BAC) provisions for novice riders the same as for novice car drivers.

Figure 5 shows that 71% of the 411 public submissions were deemed to be supportive of requiring zero blood alcohol while riding among R-Date endorsed licence holders, 19% were deemed to be non-supportive and in 10% of cases it was not clear if the respondent supports or does not support the proposal.

Figure 5 - Zero BAC while riding for R-Date endorsed licence holders



Public respondents making supportive comments tended to simply say “agree”, “yes”, “OK”, “great idea”, “absolutely” and “definitely”, while more detailed comments included:

- > “mental and physical impairments from alcohol have much more serious effects when riding a motorcycle”
- > “this will help people get the message that alcohol and operating a motorcycle don’t mix”
- > “places R-date in the same category as provisional licensing”
- > “this is the one rule which should be made compulsory as alcohol is a definite universal retardant of reaction times”

- > “I have a preference for zero blood alcohol for ALL drivers”
- > “anyone not on a full licence should have a zero BAC limit”
- > “alcohol and rider safety are incompatible: I suggest zero alcohol for unrestricted R licence holders as well”
- > “it requires better coordination to handle a bike than a car”
- > “alcohol should play no part in motorcycle riding when in a learning phase”
- > “driving with alcohol in your blood system is stupid; riding with alcohol in your system is just extremely dangerous”
- > “most sensible R-Date riders don’t drink when they ride anyway”
- > “even as a full R rider I never drink and ride”
- > “make it zero for all road users”
- > “this is a sensible idea which should have been implemented long ago”
- > “should be applied to all drivers”
- > “zero is the GO”
- > “yes: your balance is compromised and your bravery level increases, it’s a dangerous mix”
- > “people should be trying to minimise the odds of being involved in a crash, rather than introducing factors to increase it”
- > “a motorcycle is not the thing to be riding when not fully alert”.

Those making non-supportive comments tended to think that people who drink and ride would probably do so regardless of any legislative changes. The comments not supporting the proposal included:

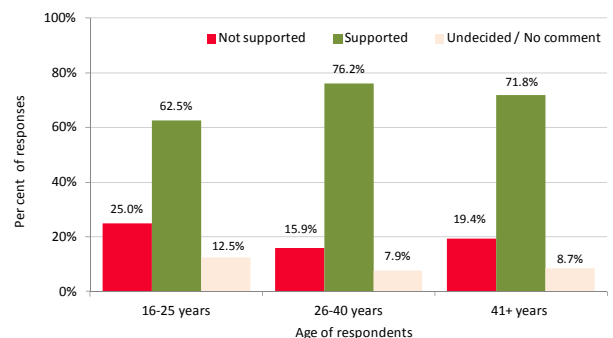
- > “I think this is a dumb idea and smacks of the start of a move to make the BAC zero for ALL road users”
- > “it is recognised that a driver is not “drunk” at .05”
- > “so all the car drivers who live after a collision with a dead motorcyclist can drink alcohol”
- > “I don’t think it should be zero but it could be lower”
- > “you can’t legislate for idiots”
- > “accidents are caused by bloody blind & impatient car or truck drivers towards motor bike riders”
- > “educate car drivers is the key”
- > “zero BAC should be only while the Date has not expired”
- > “to discriminate against motorcycle riders is not OK”
- > “the current .05 level is more than enough”
- > “same rules for everyone”
- > “too unfair - one beer could put you over the limit and you are not in any way impaired”
- > “legislating for this is discriminatory and continues to send the message that the government’s attitude towards motorcyclists is one of punitive paternalism”.

Responses where it was not clear whether the person supports the proposal or not included:

- > “if motorcycle licence held less than 12 months maybe yes; if licence R-Date held for more than 12 months & not upgraded then no”
- > “this is a ‘feel good’ proposal”
- > “how many of the motorcycle serious casualties involve R-date (or in fact any) riders with a legal positive BAC level?”
- > “remove the ‘Sorry Mate I Didn’t See You’ defence”
- > “are people with R date licenses over represented in blood alcohol offences?”
- > “do not see how this can stop drinking and driving”
- > “this proposal could have merit if it was across the board, i.e. all vehicles”
- > “should be commensurate with age & overall road experience”.

As indicated in Figure 6, the majority of public respondents across all age groups support the proposal that R-Date licensed riders should not be allowed to ride with any concentration of alcohol in their blood or oral fluid.

Figure 6 - Proportion of public responses to the novice rider zero BAC proposal by age group





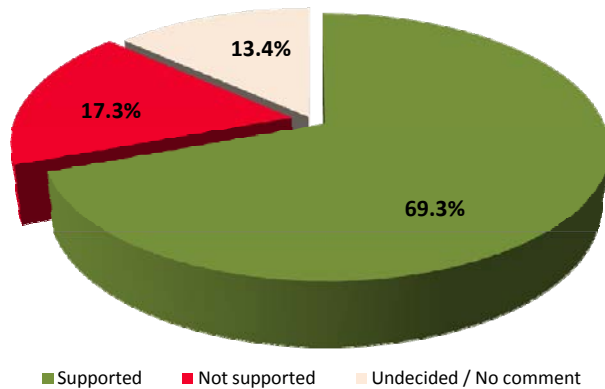
## 4. Introduce specific licensing and training requirements for riders of mopeds.

Car licence holders riding a moped on South Australian roads do not need to hold either a permit or a licence of a motorcycle class. As a result, moped riders who hold a car licence are not currently required to undertake Rider Safe training and may therefore lack defensive riding skills and knowledge of protective clothing.

Given that mopeds handle like motorcycles and carry a crash risk similar to motorcycles, it is proposed that moped operation be available only to riders who have demonstrated competence to handle a moped (or motorcycle) through specific skill and knowledge based assessment. This proposal would bring moped riders under the same licensing arrangements for motorcycle riders, including compulsory Rider Safe training.

Figure 7 shows that 69% of the 411 public submissions were deemed to be supportive of requiring that moped riders undertake training, 17% were deemed to be non-supportive and in 13% of cases it was not clear if the respondent supports or does not support the proposal.

Figure 7 - Training for moped riders



Public respondents making supportive comments tended to say “about time”, “yes”, “essential”, “absolutely” and “definitely”. More detailed comments included:

> “long overdue: I’m fed up seeing these ‘unriders’ in the bicycle lane and generally showing no road-craft or awareness at all”

- > “a moped is a motorcycle therefore should need training”
- > “too many moped/scooter riders lack the knowledge and road etiquette along with wearing inappropriate clothing”
- > “mopeds and motorbikes should be under the same licensing”
- > “how it has been allowed this long surprises me and rider gear should also be enforced”
- > “as a motorcyclist and car driver I’m regularly amazed at the stupid and dangerous behaviour of scooter riders”
- > “the idea that someone could get onto a moped without proper training is pretty absurd”
- > “people can be drawn into thinking these mopeds are toys but are far from it when they have the misfortune to have a collision”
- > “all moped/scooter riders should complete a rider’s licence as there is no difference in the way you ride with a speed limit of 60kmh”
- > “riders of mopeds which only need a car licence should have the same compulsory rider training. These riders have no knowledge about emergency braking or where to place themselves safely on the road”
- > “it is imperative in today’s climate that all riders using public roads should undergo training. To see some riders in holiday times / areas riding the 50cc hire bikes, inadequately dressed and with complete disregard to road rules can be disturbing”.

Those making non-supportive comments tended to think that people who ride mopeds are only travelling short distances and that mandatory training would discourage people from using mopeds. The comments not supporting the proposal included:

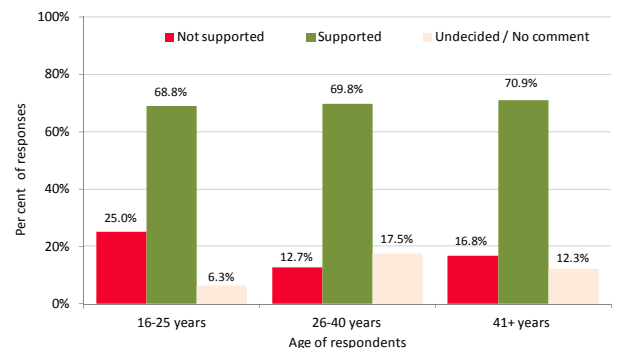
- > “they don’t travel much faster than cyclists but have better brakes and lights and wear real helmets”
- > “what if we had “pedestrian” training, that would reduce the road toll, and raise revenue; focus on maximizing results not complicating processes”
- > “motorcycle riding should be encouraged in every way possible: less traffic congestion, less parking spaces needed, less wear and tear on the roads, less pollution, cheaper transport”
- > “not a good idea as I don’t think mopeds handle like motorcycles”
- > “it appears that you are concentrating on deterring people from becoming motorcyclists”
- > “these slow vehicles 50cc and below, should be allowed to travel in the bicycle lane on roadways”
- > “while Adelaide has a bad public transport system, alternative private transport like mopeds should be encouraged”
- > “the cost of rider training is probably more than the cost of the moped”
- > “this is not necessary; will we license bicycle riders?”
- > “more Red Tape Bureaucracy”
- > “this is prohibitive for many who use mopeds as cheap transport for uni, school, work etc.”
- > “as a moped owner for 6 years... I have never been in an accident nor received an infringement while using my moped. I do not believe they are the main accident problem as much as motorcycles because they do not go over 50-60km/h”.

Public responses where it was not clear whether the person supported the proposal or not included:

- > “allowing a moped onto a road with a 100 km speed limit when they cannot do more than 50km per hour is asking for trouble; I have witnessed mopeds on open roads; mopeds should be restricted to roads where they can achieve the posted speed limit”
- > “when I was getting my car licence we had a moped and I rode it everywhere”
- > “the danger associated with the moped in traffic is more like a bicycle in traffic the main danger being knocked off by bigger vehicles”
- > “mopeds should be illegal, unless ridden in the CBD”.

As shown in Figure 8, the majority of respondents across all age groups indicated that they support the proposal that moped riders should be required to undertake rider safe training.

Figure 8 - Proportion of responses to moped training proposal by age group



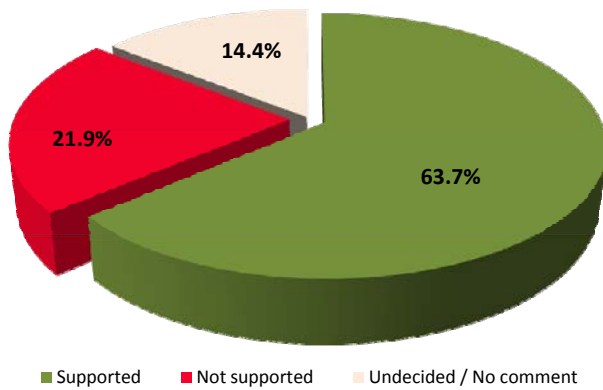
## 5. Riders with an R-Date licence endorsement (including riders of mopeds) to be banned from carrying a pillion passenger.

Carrying a pillion passenger safely on the back of a motorcycle makes safe riding more difficult and if something goes wrong the potential for serious consequences is high. This difficulty is increased if the rider is inexperienced and instructing the pillion passenger on techniques such as getting on and off the bike and holding on during braking, accelerating and cornering.

It is proposed that any rider who wishes to carry a pillion passenger on their motorcycle must have an unrestricted R class licence endorsement. It is also proposed that a rider of a moped would also not be permitted to carry a pillion passenger for the first 12 months.

Figure 9 shows that 64% of the 411 public submissions were deemed to be supportive of requiring that novice riders should not be allowed to carry a pillion passenger, 22% were deemed to be non-supportive and in 14% of cases it was not clear if the respondent supports or does not support the proposal.

Figure 9 - Pillion passenger restrictions



Public respondents making supportive comments tended to say things like “agree”, “positive move”, “has merit”, “good idea” and “well overdue”. More detailed comments included:

- > “training and testing about carrying pillions might also be warranted”

- > “allows for consolidation of theory and practice, before exposing others to risk”
- > “when carrying a pillion the handling characteristics of the motorcycle could be greatly affected”
- > “need a lot of experience to carry a pillion safely”
- > “pillion passengers add distractions and potential balancing issues”
- > “confidence in one’s ability to handle a motorbike is paramount before allowing the added responsibility of another person’s welfare”
- > “a pillion passenger that is not experienced in being on a motor cycle can contribute to an accident”
- > “unlikely to impact many riders, as few motorcyclists would be carrying pillions this early into their riding lives”
- > “having the extra weight and unbalance on the back for someone not experienced is asking for trouble”
- > “unless the pillion passenger is also the holder of a full motor cycle rider’s licence they will lack the skill to be a safe passenger”
- > “carrying pillions on these underpowered unstable bikes is suicide”
- > “another great idea, also ban baseball capped passengers from riding P plate driver cars”.

Those making non-supportive comments tended to think that there is little evidence to suggest this would help and thought it was unfair for people who carry a pillion because they needed to do so for mobility purposes. The comments not supporting the proposal included:

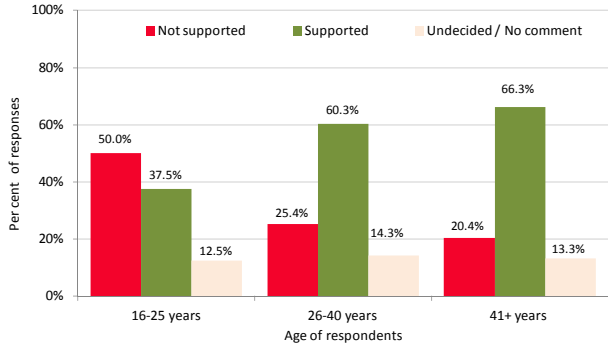
- > “no driver is expected to wait till they have a full licence to carry passengers and for good reasons; it is practical!”
- > “I don’t see any real statistical benefit to this”
- > “it should be up to the passenger and not restricted”
- > ”could be an issue if people are dependent on riding on their partner’s bike to be taken to work etc.”
- > “would not be a fair decision to people who have a family or partner and only have a motorcycle or scooter as a means of transport”
- > “has no one viewed the Asian influence and what they do in their country, so why not follow their lead and teach them differently, unless we are out to just find another fineable offence”
- > “this just inconveniences all concerned and will stop some people using mopeds when they are very economical and much more space efficient in parking”
- > “educate the killers who drive the killing machines: cars / trucks”
- > “you are attempting to steal the right to carry a passenger”.

Public responses that were not clear whether they were supportive or non-supportive included:

- > “why not make the training better, and make it harder to pass the licence tests”
- > “are passengers of R date licence holders over represented in accident data?”
- > ”yes and no: sometimes you may need to carry an extra person and I thought we were trying to cut carbon down and a small bike only uses a little fuel with minimal wear on the roads”
- > “this should be commensurate with age & experience”
- > “is training on carrying a pillion part of the current licensing training?”

Half of the public respondents aged under 26 years indicated that they did not support the proposal to ban carriage of pillion passengers while the respondents in the older age groups were supportive of this proposal, as indicated in Figure 10.

Figure 10 – Public responses to pillion passenger restriction proposal by age group



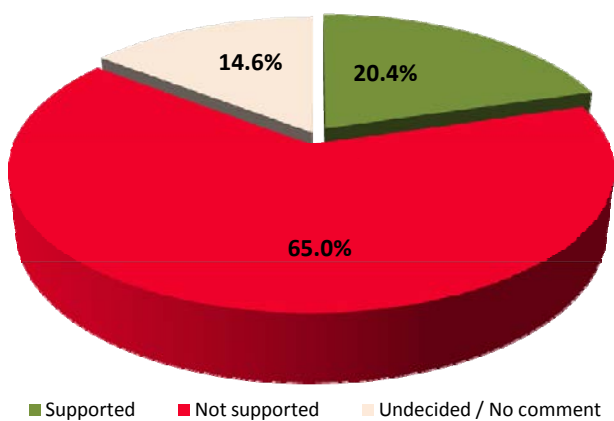
## 6. Explore options for a Motorcycle Safety Fund dedicated to motorcycle safety initiatives to address high and disproportionate risks.

Current resources generate safety improvements for all road users but there are some specific improvements which are more likely to benefit motorcyclists. It is proposed that the creation of a motorcycle safety fund be considered in order to provide funding for dedicated motorcycle safety projects.

If a proposed motorcycle safety fund concept were to be implemented in South Australia, it is envisaged that the revenue would be spent on a range of dedicated motorcycle safety initiatives to provide riders with safer riding experiences. It is proposed that decisions about which safety initiatives and projects the fund would be used for would be determined in conjunction with representatives of motorcycling interest groups and riders.

Figure 11 shows that only 20% of the 411 public submissions were deemed to be supportive of the proposal to explore options for a motorcycle safety fund, 65% were deemed to be non-supportive and in 15% of cases it was not clear if the respondent supports or does not support the proposal.

Figure 11 - Motorcycle safety fund



Public respondents who made supportive comments on this proposal tended to say “they agree” having a motorcycle safety fund to address motorcyclist specific hazards would be a “good idea”. More detailed comments included:

- > “a fund would be great if it was used to educate car drivers to their responsibilities to give way to motorcycles; how to identify a motorcycle; how to judge how fast a motorcycle is closing; how to perform a proper head check etc.”
- > “it should be about all motorcycling, on and off road and must not be used to replace items which would normally be funded by government”
- > “riders should be aware that accidents aren’t always their own faults, but then should be well educated as to how to avoid motor car misjudgements”
- > “will assist in reducing instances of incidents/ accidents”
- > “should be used for cheaper training, non compulsory sessions that allows people to feel less pressured into learning and enjoying the rider experience”
- > “use for additional training beyond the Advanced RiderSafe course”
- > “anything to reduce/address these risks is certainly worthwhile at least exploring”
- > “funding should be the same as the Victorian Government and applied to registration fees on the motorcycle”
- > “use the money to make the roads safe not the death traps they are now; I’ve hit holes that are deeper than the 8” wheels on one of my bikes”
- > “the fund should be controlled by those who ride”.

Those making non-supportive comments tended to “strongly disagree” and comments indicated that the proposal was “discriminatory”, “unfair”, “another tax grab”, “riders being singled out” and “punishment”. The non-supportive comments included:

- > “I have 3 cars and two motorcycles registered, I can only drive or ride one at a time; surely there is enough funding in what I pay for some to be allocated here”
- > “motorcycle riders are already paying their fair share of taxes which contribute to road construction and safety”
- > “the levy should be paid by all road users”
- > “the money will be wasted as it has in Victoria, it will just go into general revenue; it is already expensive to run a vehicle in SA; stop adding costs to citizens who are already struggling to pay their bills”
- > “fix the roads, they are mostly in a dangerous condition and are the major cause of accidents after driver inattention”
- > “motorcycles should be given some recognition/ reward for less wear and tear on our roads, causing less traffic congestion, use less of our limited resources (fossil fuels) and is an effective and efficient method of transport of people (benefits obvious on Asian roads) and this should be encouraged by Government and not discriminated against”
- > “more car drivers have been killed in car accidents, so make the car drivers pay”
- > “marginalising and allowing the generally cycle ignorant motoring public another argument in their blame game when it comes to the crunch is not the answer”
- > “the best way to improve road safety is advanced driving skills & education for all road users”
- > “road safety will benefit every road user not just motorcyclists; sure have a fund, but spread the cost across every road user one not just motorcyclists”

- > “use speeding fines for those doing the wrong thing and fix our dangerous roads”
- > “this is looking like a blatant money grab, by a broke underperforming state, scrambling for any extra revenue it can gather no matter from where or whom”
- > “there should be more car driver training making drivers aware that they need to not just use their rear and side mirrors when changing lanes etc, but to look over their shoulder (thus eliminating the blind spot)...this education should occur as a matter of course and not require additional levies on motor bike riders”
- > “road safety is the responsibility of all South Australians”; why tax a vulnerable group of road users”
- > “much/most of the funds would be spent on advertising and administration rather than motorcycle safety”
- > “this is a backdoor move by a government short on money to finance regular road safety policing as mentioned on page 17 of the Discussion Paper”
- > “I own a motorbike and only use it sparingly and would find this a great impost on already outrageous fees to keep riding”
- > “surely putting a levy on the motorcyclists is a bit unfair as the people who don’t speed or ride recklessly are penalised for the minority”.

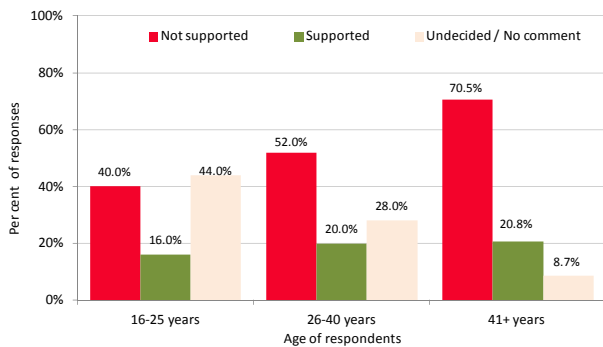
Public responses that were not clear whether they were supportive or non-supportive included:

- > “you can dress us up in hi-vis vests etc, but that WILL NOT make us any more visible to those with their eyes shut!”
- > “what happens to a rider who impacts with a wire-rope safety fence at 80 km/h?”
- > “awareness is key; what people do not know is no fault of their own only ignorance”
- > “what about the way armour walls are built on freeways and roads, each and every one of the vertical support posts beneath them are absolutely lethal to motorcyclists, a close friend died at low speed”

- > “the real cause of motorbike accidents is not suitable training; at the moment you go for 4 hours to a basic course ride around in a tennis court then hand over a licence to ride in traffic, in the hills on a bike”
- > “teach the car drivers to look out for motorcyclists. My father, uncle and mother all got hit by CARS at T junctions while riding their motorbikes”
- > “make retesting of ALL drivers after 5 years compulsory ... prove competency and knowledge of new / changed laws since getting their licence”
- > “I rather like the concept of a representatives group with the resources to look at problems and issues on the road from a motorcyclist’s viewpoint, and having the resources to research and address some of these to benefit all road users”
- > “I support using the proceeds from fines from traffic offences from all drivers and riders, to create a pool of money from which road safety initiatives are funded according to their percentage of road user type, e.g. motorcyclists”.

As shown in Figure 12, public respondents aged 41+ years had the greatest proportion (70%) of non support for the proposal to explore options for a motorcycle safety fund.

Figure 12 – Public responses to motorcycle safety fund proposal by age group



# ----- FEEDBACK – STAKEHOLDER SUBMISSIONS -----

The following summary samples the range and depth of stakeholder and other feedback received, rather than attempting to incorporate every single comment. The summary concludes with a spreadsheet overview of which stakeholders supported or did not support which proposal.

## Road Safety Stakeholders

The **Australian Medical Association (AMA) and the Royal Australasian College of Surgeons' (RACS)** Road Safety and Trauma Committees respectively made a joint submission, saying:

“We have noted over many years that motorcyclist death and injury rates are significantly out of proportion to the numbers. Although motorcyclists may not be at fault, that is of little comfort in the event of a crash. On that basis, any course of action that enhances the experience gained by motorcyclists, maintains a high level of skill, and enhances visibility, should theoretically be very helpful. We support the logic of the points... regarding proposed courses of action and offer the following comments:”

### *Car licence before motorcycle learner's permit*

*“Having a car licence for at least 12 months before applying for a motorcycle learner's permit would be most useful as it would help the rider to gain experience in a safer environment, as well as an understanding from the car driver's perspective of the difficulties of seeing motorcyclists.”*

### *Six months between Basic and Advanced Rider Safe*

*“A compulsory six-month period between the Basic and Advanced Rider training courses would seem intuitively appropriate given that the greater the skill the better the chances of crash avoidance. Additional training time is potentially useful, particularly in view of the high morbidity and mortality of motorcyclists within one year of obtaining their licence.”*

### *Zero BAC for R-Date riders*

*“The data regarding motor vehicles demonstrates that .05 is reasonable, however the decision-making and cognitive and motor skills required for a motorcycle would appear to be much higher and thus a 0 blood alcohol concentration with Class R is supported.”*

### *Licensing and training for riders of mopeds*

*“Specific licensing and training for mopeds is considered positive as a number of the issues faced with a motorcycle apply to this group as well.”*

### *Pillion passenger ban on R-Date*

*“From our experience pillion passengers suffer the same injuries as the driver, so to limit their risk with a Class R-Date licence would seem reasonable, so banning R-Date licence holders from carrying a pillion passenger would seem sensible.”*

### *Explore options for a Motorcycle Safety Fund*

*“To have a specific motor cycle safety fund also seems a beneficial idea.”*

The AMA and RACS Committees added that steps should be taken to ensure that motor cyclists' number plates are visible, so that they can be easily photographed with a speed camera, and that further means should be explored for enhancing the visibility of motorcyclists, noting that some motorcyclists maintain their headlights on during the day. A copy of the RACS position statement on motorcycle safety was attached to the joint submission.



The **Australian Road Research Board (ARRB)** supported the first five proposals in principle, but pointed out that the motorcycle riders who have the most crashes tend to be older and therefore the proposals would be unlikely to contribute to rider crash reduction to the same extent that younger driver measures will reduce driver crash rates. ARRB Ltd also cautioned the need to ensure that making it more difficult to get a motorcycle licence doesn't lead to increases in unlicensed riding. Further measures may be needed to discourage people from riding if they have a driver's licence but no rider licence.

#### *Explore options for a Motorcycle Safety Fund*

*“A safety fund to address high and disproportionate risk would appear to be a sensible approach... One key lesson to be learnt from the VicRoads treatment of high risk motorcycle locations is that motorcycle crashes do not tend to cluster into blackspots, but rather are typically more dispersed across the network due to the lower numbers of motorcyclists. This... will be an even greater issue in South Australia due to lower traffic volumes. This makes the identification of high risk locations or routes difficult based solely on crash numbers. An alternative approach is to supplement the information on crash locations with a risk assessment-based approach. The road features that contribute to motorcycle crash risk are well known and are quantifiable. By collecting data on road design element it is possible to calculate a likely risk and severity score for motorcyclists.”*

The **Australian Driver Trainers Association (ADTA)** sent a submission in which the following specific points were raised:

#### *Car licence before motorcycle learner's permit*

*“We feel it would discriminate against any one that wished to obtain a motorcycle licence”.*

ADTA suggested instead a training scheme requiring a road log book with a registered motorcycle school and in which a learner rider would only be able to ride if accompanied by a qualified supervising rider.

#### *Six months between Basic and Advanced Rider Safe*

*“We feel this submission is unnecessary and will not influence the outcome of reducing lives.”*

ADTA added if the training scheme it suggested were adopted it would negate the necessity of a six month period.

#### *Zero BAC for R-Date riders*

*“We agree that a novice rider should be on a zero BAC while on their R-Date licence.”*

#### *Licensing and training for riders of mopeds*

*“We do not agree that a specific licence and training program be put in place for small capacity scooters / mopeds.”*

Instead, ADTA recommended that anyone wishing to ride a scooter must attend the Basic level Rider Safe course.

#### *Pillion passenger ban on R-Date*

*“We feel it is necessary for the development of a novice rider to gain the experience of carrying a pillion.”* However, ADTA added, *“Therefore we recommend that the restriction be inclusive of the R-Date classification not just on the learner's permit.”*

### Explore options for a Motorcycle Safety Fund

*“Charging motorcyclists extra for road safety initiatives on existing registration is an unfair tax on motorcyclists. Cyclists get lots of funding for bike lanes and road safety campaigns, yet there [is] a user group that is not taxed. Motorcyclists are a vulnerable road user similar to cyclists and should be considered equally to other vulnerable road users.”*

In its concluding statement, ADTA echoed a comment of ARRB Ltd that “...our novice riders are safer than our experienced riders...” and thus “...it is possible that the focus is on the wrong group...”, but nevertheless added, “It would seem that any extra training given to novice riders can only be a good thing.”

ADTA also pointed out, “Finding a practical way to have people surrender their motorcycle licence if they are not riding any more could be a simple way of stopping people from getting back on a bike after a long absence.”

Finally, ADTA urged that any initiatives implemented “...must be closely monitored and reviewed to ensure they reflect original” intentions.

**Business SA** wrote a short letter indicating its general support for the proposals, except for the car licence before motorcycle permit and moped licence and training, for which it stated:

*“However, the effective raising of the age limit from 16 to at least 18 for acquiring a motorcycle licence, as would occur under the first proposal and the fourth... may have the unintended consequence of limiting the ability of a young person to find a job, harming these individuals, as well as businesses.”*

The **Centre for Automotive Safety Research (CASR)** also submitted a short letter, but indicated it supported all six proposals, noting that “...proposals 1, 3 and 4 address situations where there is currently an inconsistency between conditions applying to users of different transport modes. The first five also promote the notions embedded in Graduated Licensing Schemes that greater experience leads to performance benefits (proposals 1, 2 and 4); and that experience must be gained before increasing exposure to more risky conditions (proposals 3 and 5).”

The **Director-General Community Safety's** letter commented:

*“The Motor Accident Commission advises that between 2005 and 2009, the average cost of a motorcyclist Compulsory Third Party claim was three times that of a motorist claim and the average length of time they spend in hospital is 5.4 days which is the highest amongst all road user groups except for pedestrians.*

*Bringing motorcyclists more in line with the principles of graduated licensing schemes including the introduction of alcohol and passenger restrictions is supported.*

*I agree with the Motor Accident Commission's view that the Motorcycle Safety Fund's ... benefits warrant further exploration of options for introducing such a fund in South Australia.”*

The **Country Fire Service Volunteers Association (CFSVA)** agreed that rider inexperience contributes to the road toll, but argued that, *“...for many young people in regional South Australia, travel by motorcycle is potentially their only means of transport... The ability to ride a motorcycle unaccompanied provides a viable and affordable option for travel to and from regional centres where work opportunities exist.”* In this regard, CFSVA added, *“The requirement to hold a car licence for a 12 month period could further delay the ability for a young person to enter the workforce.”*

The CFSVA also raised the issue that the proposals do not consider the issue of *“older ‘weekend’ riders of high powered motorcycles.”*

The **Federal Chamber of Automotive Industries (FCAI)** made the following comments in its submission:

#### *Car licence before motorcycle learner’s permit*

*“There is no evidence to show that delaying young people from having a motorcycle licence until after they have a car licence for a period would have a net positive long term safety outcome.”* FCAI advised that it cannot be rationally argued that, *“...compelling a novice to first learn to drive a car, with significantly more potential than a motorcycle to harm others, is a valid strategy to prevent overall road trauma. Young car drivers are often implicated as a causal factor in multiple fatality and/or injury events, whereas this is rarely the case with novice motorcycle riders.”*

FCAI added, *“The discussion paper also states that under the proposed change ‘A novice motorcycle rider who first learns to drive a car, learns to negotiate varied traffic and road conditions in the relative safety of an enclosed vehicle’. The reality is that many potential riders would have learned to negotiate traffic on a bicycle and may have been riding daily in traffic for some years.”*

FCAI also cited university research stating there are *“...clear reasons why introducing this limitation would unfairly disadvantage many young people. Preventing access to the comparative affordability of motorcycles and mopeds (scooters) as a personal transport option (including purchase cost, parking costs, parking availability, reduced fuel costs, etc.) and the positive ‘green’ lifestyle choice motorcycles offer in congested urban areas, would disadvantage many young people who may choose motorcycling as their preferred or even necessary means of transport.”*

#### *Six months between Basic and Advanced Rider Safe*

*“It is highly desirable that a nationally uniform training and licensing regime be implemented in all states. As this is not presently the case, any change to the current system should be evidence based. Unless there is evidence to show that increasing the time between the basic and rider safe training courses will improve skill acquisition and safety outcomes the status quo should remain.”*

#### *Zero BAC for R-Date riders*

*“There is much evidence to show that during the skill and experience acquisition phase even low level impairment by alcohol or other drugs is disadvantageous to safety outcomes. There are also many other states where this requirement is already in force.”*

#### *Licensing and training for riders of mopeds*

*“It is clear that whilst there are many similarities between motorcycles, mopeds and scooters there are also many differences in performance, operation and riding strategies. Whilst supporting training for ALL road users the FCAI and its member companies believe that any training and licensing for scooter and moped riders should specifically address the performance and mobility characteristics of these smaller and lighter ‘automatic’ vehicles.”*

### *Pillion passenger ban on R-Date*

*“There is evidence to suggest that the prohibition of carrying pillion passengers on a motorcycle during the skill and experience acquisition phase has positive safety benefits. There are also many states where this requirement is already in force...”*

### *Explore options for a Motorcycle Safety Fund*

*“Whilst it is clear that motorcyclists are disproportionately represented in injury and fatality statistics it is not clear that motorcyclists comprise the majority of ‘at fault’ parties. It is therefore unconscionable that motorcyclists should be singled out as the only group of road users required to fund their own safety programs. As with all other road user groups, funding for motorcycle safety programs should come from the consolidated road safety budget.”*

The **Motor Accident Commission (MAC)**'s, letter noted, *“In terms of their impact on the Compulsory Third Party (CTP) insurance fund, in 2011 there were 222 crashes involving motorcyclists which cost the fund over \$40 million. Between 2005 and 2009, the average cost of a motorcyclist claim was three times that of a motorist claim and the average length of time they spend in hospital is 5.4 days which is the highest amongst all road user groups except for pedestrians.”*

*“MAC applauds the six proposals of this report. Most follow the principles of Graduated Licensing Schemes (GLS) which are designed to slowly increase the freedoms of drivers/riders as more experience is gained.”*

*“MAC has been concerned about the rise in popularity of mopeds, and the fact that these vehicles can be ridden without a specific licence or mandatory training. The moped proposal covers this issue. If a moped rider has a motorcycle licence, this may act as an incentive to quickly graduate to a larger motorcycle. We would trust that the proposal in no way encourages such an action.”*

*“The issue of a Motorcycle Safety Fund will no doubt be a contentious issue but MAC believes that having a fund to improve the safety for motorcyclists is likely to be effective, and accordingly MAC supports the proposal for a levy. We note the options of collecting a levy through the licence or through the registration process. On balance we believe it is more efficient to raise the levy through the licence, as it would have the bonus of encouraging the abandoning of motorcycle licences by the many that never use that licence. This would discourage untrained people returning to riding.”*

The **Royal Automobile Association (RAA)** made a detailed, comprehensive submission in response to the six proposals as well as suggesting several potential motorcycle safety measures of a non-licensing nature.

### *Car licence before motorcycle learner's permit*

*“RAA understands the importance of addressing the over-representation of motorcycle and scooter riders in road crash statistics, but also believes that riders will gain no real benefit from the requirement to hold a driver's licence prior to being eligible to apply for a motorcycle permit... Motorcycle riding requires significantly higher levels of vehicle control, as well as more complex cognitive and perception skills when compared to driving a car. RAA considers that the introduction of this initiative would affect motorcycling as an important mode of transport, and... also recognises that motorcycles are often a more affordable mode of transport for young people, who may not have access to a car. As such, this initiative would potentially place an additional barrier to their mobility.”*

### *Six months between Basic and Advanced Rider Safe*

*“Due to the stability and handling characteristics of a motorcycle, rider control skills are significantly more demanding than those of a car driver, particularly in complex situations... The introduction of a compulsory six month*

period between the training courses would assist riders in obtaining valuable skills under learner conditions, as well as more comprehensive on-road experience and understanding of the operation of a motorcycle.”

#### Zero BAC for R-Date riders

“Research indicates that inexperienced drivers and riders have a higher crash risk when exposed to alcohol, even at low concentrations. A zero blood alcohol concentration limit has been shown to reduce the crash risk of inexperienced riders, regardless of age. Consumption of alcohol at any level can have a greater impact on motorcycle riders than on car drivers. Riding a motorcycle places different and additional demands on the rider, such as co-ordination, balance, and concentration. Motorcycles are less stable and more sensitive to rider dexterity and road conditions and in the event of a crash, more serious injuries are sustained by a motorcyclist, compared to a car driver. Any impairment that reduces a rider’s ability to cope with these demands can significantly increase crash risk.”

#### Licensing and training for riders of mopeds

“Based upon moped sales and registrations, it is clear that the uptake of moped use is increasing... As moped riders receive no specific training other than that required for a car licence, certain issues can arise regarding vehicle handling and control, as well as interaction with other road users in the traffic environment. Rider training and licensing requirements are likely to improve riders’ knowledge and ability to safely operate a moped. RAA believes that introducing specific training and licensing requirements will better prepare riders for the handling and operating of a moped which is vastly different to that of a car. RAA supports specific licensing and training requirements for mopeds and believes that this initiative will more closely align South Australia with National licensing practices in Australian Capital Territory, New South Wales, Tasmania and Victoria.”

#### Pillion passenger ban on R-Date

“A rider needs to be sufficiently skilled and experienced before taking on the responsibility of carrying a passenger. Research suggests that carrying a pillion passenger not only increases the total number of persons at risk but that the severity of injury to the rider is greater when a passenger is carried. RAA recognises that balancing a motorcycle is more difficult with a passenger and requires a more skilled and experienced rider... RAA believes that this initiative would help in reducing the number and severity of crashes involving pillion passengers.”

#### Explore options for a Motorcycle Safety Fund

“RAA believes that significant road safety benefits could be achieved from the establishment of a Motorcycle Safety Levy, provided that it is completely directed at motorcycle safety initiatives... [such as] better targeted motorcycling safety awareness programs, targeted driver awareness campaigns, training, improved data collection / analysis and improved rider representation....[A] proportion of the fund should be allocated to professional motorcycle advocacy and representation, as is the case in Tasmania. The Tasmanian Motorcycle Council receives a proportion of its funding from government and as a result is able to effectively and professionally work with government on motorcycle road safety issues. RAA believes that the motorcycle levy should not be greater than \$66 which is the case in Victoria. A strategic framework to guide expenditure of levy funds should be developed if the levy is introduced and the nominated monies should be placed into a specific fund. RAA also believes that if the levy is introduced, it should be incorporated into legislation which specifies how the funds received from the levy should be spent.”

The RAA's submission also made detailed comments on road infrastructure issues related to motorcycling, the need for better research and evaluation into motorcycle safety and safety initiatives, implementation of a star-rating system for protective clothing, refresher courses for returning riders, decision making on motorcycle safety, education for both drivers and riders on motorcycle safety, and use of technology.

In a concluding statement the RAA advised that the full social impact of the proposals, if implemented, would need to be closely monitored, with a view to providing additional support where needed and that the road safety impacts of the changes should be measured, reported and results made available to the public.

The **Country Fire Service (CFS)** made no specific comments on the proposals, simply saying that the CFS supports any efforts aimed at improving the safety of people on our roads.

The **South Australian Farmers Federation (SAFF)** submitted the following comments:

*Car licence before motorcycle learner's permit*

SAFF noted that this proposal would effectively raise the minimum licence age for a motorcycle to 18 years, meaning that young farmers under age 18 *"...would not be able to cross a road on a motorcycle or move down a road to other parts of a family farm, or travel along public roads near where they are living and working."* SAFF notes that as many young people have difficulty in completing their learner's permit requirements for driving a car, often due to parents being too busy to supervise their driving, rural young people are turning to motorcycling as their first transport choice. SAFF suggests that, if the proposal is implemented, where a motorcycle is owned by a primary producer, a learner may commence at age 16 as they are now, but have to remain on their permit until age 18 or over.

*Six months between Basic and Advanced Rider Safe*

SAFF considered this proposal would be acceptable in most circumstances.

*Zero BAC for R-Date riders*

SAFF supports this proposal.

*Licensing and training for riders of mopeds*

SAFF submitted that while such training and licensing may be warranted, they were unsure of the existence of evidence for it.

*Pillion passenger ban on R-Date*

SAFF considers this to be acceptable.

*Explore options for a Motorcycle Safety Fund*

While SAFF considers this proposal to be acceptable, it asked why it would be necessary to create a special fund if the Motor Accident Commission already has such a role.

The **Commissioner of Police (SAPOL)** wrote to say that he supports each of the proposals in recognition of their potential positive impact on motorcyclist safety.

## Local Government

The **District Council of Grant** submission generally supported all six proposals, but noted that their chief effect would be on younger riders rather than older riders who pose the greater crash problem. The Council called for more research into the safety needs of older riders. Specific comments on the six proposals were:

### *Car licence before motorcycle learner's permit*

*“Although a sound proposal, this may have negative outcomes of restricting employment opportunities for young people; restrict a young person's mobility and accessibility; impact on primary production family business functions, and affordability of transport options.”*

The Council suggested there should be an exemption system for access to education or employment, provided a car licence is held.

### *Six months between Basic and Advanced Rider Safe*

*“This proposal is supported but on the condition that the Basic and Advanced Rider safety training courses are available, accessible and affordable at regional and rural locations. The six month period should add to the level of experience and understanding of road use, and hopefully provide for an increased experience and appreciation of the Advanced Rider course.”*

### *Zero BAC for R-Date riders*

In its support for this proposal, the Council noted it is in line with the Graduated Licensing Scheme for new car drivers.

### *Licensing and training for riders of mopeds*

The Council supported the proposal, noting it would bring “... a greater appreciation of road rules, handling and operating of mopeds, and the ability to adjust behaviours and reactions for prevailing road conditions....”

### *Pillion passenger ban on R-Date*

*“This proposal is supported as there should not be any significant need to carry passengers.”*

### *Explore options for a Motorcycle Safety Fund*

*“This proposal is supported as an attempt to improve rider education and positive road safety outcomes. How this fund would be generated would be of some concern, as it is envisaged that funds would come through some form of fee increase or imposition attached to licences – and how can we then be sure that regional areas will be provided with a fair share of funding and programs?”*

**Wattle Range Council's** submission only addressed the car licence before a motorcycle learner's permit proposal, saying it does not support it as the Council considers that many people choose to ride a motorcycle as their first mode of transport and this is much more affordable than operating a car.

## Members of Parliament

The former **Minister for Health and Ageing, Hon John Hill MP**, advised that he supports measures aimed at reducing motorcyclist injuries and that, based on medical grounds, the Department for Health and Ageing (DHA) supports requiring a zero blood alcohol concentration among novice riders.

With regard to the remaining proposals, the DHA said it is not able to provide definitive support based on the lack of supporting information within the various DHA databases on motorcyclists and in its search of relevant medical literature.

Contrary to the views of some other submissions, the DHA pointed out that there “... *does appear to be an over-representation of younger riders among those injured, which indirectly supports targeting this group as the recommendations appear to do. In addition, some studies suggest that the risk of a crash decreases with the number of years a rider has held a licence, again indirectly supporting these recommendations*”.

The former **Minister for Youth, Hon Ian Hunter MP** advised that the Minister's Youth Council (MYC) discussed the proposals at its October 2012 meeting. The MYC was supportive of all but the first proposal for which it recommended consideration of the impact it could have on people not intending to obtain a car licence, people living in rural, remote and regional locations and the cost of operating a car compared to a motorcycle. With regard to the motorcycle safety fund, the MYC recommended that this be funded through fines paid for motorcyclist road traffic offences.

The MYC submitted several other comments regarding motorcycle safety, including educating all road users about motorcycle safety, and making protective clothing for motorcyclists compulsory while riding.

## Motorcycle Rider Groups / Industry

The **Australian Motorcycle Council (AMC)** made a substantial and comprehensive submission. Specific comments in relation to the proposals were:

### *Car licence before motorcycle learner's permit*

*“The AMC does not support this proposal. The argument for this proposal appears to be negated by the argument for Proposal 4, that specific training be required for moped riders as the experience gained as a car driver, regardless of the number of years in that capacity, is inadequate for riding a motorcycle (or moped).”*

*“While some weight may be accorded the argument that motorcycling is a more complex task than car driving, one should be cautious about according it an unwarranted degree of weight, as the only substantive difference is the need to balance on two wheels while manipulating the same kind of controls (or controls of similar purpose). The vast majority of would-be licensees have already learnt such balance on a bicycle, hence becoming familiar with a motorcycle's controls while staying upright is less of a challenge than posited.”*

*“We must also be careful of underestimating the learning capacity of those who choose a motorcycle as their first form of powered transport compared to that of car drivers. Being much smaller, lighter and more manoeuvrable than a car, the size and behavioural characteristics of a motorcycle can be quickly appreciated by most learners. Indeed, largely due to their exposure to the elements, motorcyclists tend to be far more aware of how road, vehicle, traffic and weather conditions affect safety than the majority of car drivers, hence they also tend to be better – that is, more alert, considerate and courteous – drivers when in their cars, and certainly more aware of motorcyclists.”*



*“The argument for this proposal only considers the learner-rider in relation to the learner-driver, rather than anyone else who could be hurt in a crash. The weight of a car is also many times that of a motorcycle, and the number of people it can carry greater, with a concomitant potential for causing far greater harm to other people, though the driver might remain unscathed.”*

*“The argument for this proposal also assumes that the novice rider is a young, immature and inexperienced road user, whereas the average age of the novice motorcyclist is in the vicinity of 30; in NSW, for example, the average age is 33, and it would be reasonable to assume that this is reflected in SA. Hence this requirement would disadvantage a preponderance of novices who would already be quite familiar with the road and traffic environment.”*

*“It is for these reasons that motorcyclists believe that, rather than requiring learner-riders to hold a car licence for twelve months prior to learning to ride, the reverse should be applied: that is, that learner-drivers should be required to have twelve months’ experience on a motorcycle before being able to drive. The benefit of such a requirement would be twofold, in that not only would all drivers be much more aware of motorcyclists, and hence would not feature so significantly in the causal factors of many motorcyclists’ crashes, but they would generally be better, and hence safer, road users.”*

#### **Six months between Basic and Advanced Rider Safe**

*“The AMC does not support this proposal. RiderSafe instructors already strongly recommend that Level 1 novices spend at least six months gaining experience before attempting Level 2, and given that it is not possible to determine how much experience one gains during that time, let alone how much any given individual might need, this proposal would amount to legislation purely*

*for its own sake. Further, in order to pass Level 2, a novice must be demonstrably competent, and, by implication, have sufficient experience. The current system also caters for riders of varying ability, learning rates and opportunity by enabling them to determine when they are ready to attempt Level 2, whether that be three months, six months, or longer.”*

#### **Zero BAC for R-Date riders**

*“The AMC does not oppose this proposal in principle. However... a large proportion of novice riders have had their car licences for many years and are [already] familiar with not only traffic management but the physical effects of alcohol.”*

#### **Licensing and training for riders of mopeds**

*“The AMC supports this proposal. The problem with the current system is that, given that riding a motorcycle involves specific skills, car drivers would not necessarily have acquired such skills and, hence, may be at risk, or put others at risk, of injury through crashing.*

*The value of rider training in mitigating such risk is recognised throughout the world, [including] in the Government’s RiderSafe program. It is eminently logical, therefore, given that mopeds (50cc scooters) are more akin to a motorcycle than to a bicycle, that a training and licensing course for scooters be established.*

*Such a program should be positively structured with regard to cost, content and duration in order that it does not provide a disincentive to those considering taking up scooter riding. The program should also contribute RPL (recognised prior learning) to the standard RiderSafe motorcycle training course to enable those wishing to develop their riding skills further to avoid costly repetition of training.”*

### *Pillion passenger ban on R-Date*

*“The AMC does not oppose this proposal in principle. The argument for this proposal is, in essence, that a motorcycle is less-easily controlled with the added weight of a pillion passenger, together with the possibility that a novice passenger could easily upset the stability of the motorcycle, as the pillion rider has a high degree of control over the bike.”*

*“On the other hand, an experienced motorcyclist, including an experienced pillion passenger, on the back of a novice’s bike could improve stability if needed, and could also advise the rider on safe practices en route, particularly regarding carrying passengers.”*

*“Given that “the numbers of killed or injured riders carrying pillion passengers were consistent across all ages”, the efficacy of the argument for this proposal is dubious, and there appears to be a lack of data justifying it on other grounds.”*

*“On the whole, however, as it would not be possible to ascertain a pillion rider’s skill prior to riding with a novice, and that a pillion rider might not be able to prevent a given crash occurring, with a concomitant likelihood of two people being hurt rather than one, this proposal may enable a novice to learn through experience without risking others’ lives.”*

### *Explore options for a Motorcycle Safety Fund*

*“The AMC does not support this proposal. Whilst a fund for dedicated motorcycle safety projects would be highly desirable, funding it through a levy would be highly discriminatory for the following reasons.”*

*“Motorcyclists already pay registration fees, insurance fees, petrol levies (state and federal), and taxes of various kinds which largely go into general revenue, to be returned as funding for transport and safety initiatives for all road users. To charge an impost on a particular road user group because it requires unique treatment of road surface and infrastructure in some circumstances is to remove the group from what is intended to be an equitably-funded system.”*

*“Any special treatment for motorcyclists’ requirements for a safer road system would almost invariably benefit all other road user groups, some of which (heavy vehicles) pay a tax for potential road damage, some of which (motorised bicycles) pay nothing, and the rest of which pay a rate based on power or weight. No such group pays a levy for any special requirements, nor would they contribute to a motorcycle fund that also benefited those other groups.”*

*“Generally, to date all road user groups with the exception of motorcyclists have been provided with the most up-to-date infrastructure to improve their safety (with the exception of current trials of road safety barrier systems in SA and Victoria). For example, the installation of the innovative (and infamous) Wire Rope Safety Fence (WRSF) commenced about sixteen years ago on the grounds that it vastly improved the outcome of crashes involving cars and heavy vehicles, notwithstanding that it also vastly increased the perceived death and injury risk for motorcyclists, yet no specialised levy has been imposed upon those road user groups.”*

*“Motorcycles are an integral part of the transport system and, from an ecological perspective, compare very favourably with other vehicles due to their small environmental footprint (relatively low manufacturing costs, high fuel efficiency, low emissions) and contribution to a reduction in congestion (travelling and parking). The proposed levy will penalise those who favour motorcycles and discourage this participation.”*

*“This is not to say there is no merit in a dedicated fund for motorcycle safety initiatives. Motorcyclists have particular safety requirements with regard to roads and infrastructure which would benefit from a focussed approach, driven in turn by the need to apportion such a fund efficiently and effectively. Given that the wider community would benefit from measures which improve motorcyclists’ safety, it would seem appropriate to provide such funding through the normal annual budgeting process.”*

Included in the AMC's submission was coverage of several additional matters: training drivers generally about motorcycle safety needs, fees for the Rider Safe program, a need for rider refresher training, off-road riding facilities and registration fees, improved motorcycle crash data and motorcycle road safety audits.

The **Garage Motorcycles** submission urged the Government to include an on-road component in the Rider Safe course, pursue rider refresher courses and improve data collection. It made the following specific comments on the proposals:

#### *Car licence before motorcycle learner's permit*

*"Evidence-based studies exist which clearly show that motorcyclists have better skills than car drivers, especially in the area of peripheral awareness and spatial awareness. Short of mandating a compulsory period on a motorcycle before getting a car licence, it is clear and undeniable that riding a motorcycle makes you a better car driver, and not the other way round."*

*"This proposal will surely act as a deterrent to getting a motorcycle licence. Motorcycling is still a cheap form of transport, and is without doubt a practical transport solution to environmental concerns and traffic congestion. People are still better off financially riding a motorcycle, but if people are forced to buy a car first, a motorcycle licence may well fall by the wayside. This falls into the realm of stifling our freedom of choice, as you cannot decide from the outset to get a motorcycle licence instead of a car licence."*

#### *Six months between Basic and Advanced Rider Safe*

*"Six months of riding does not necessarily constitute six months of "experience gained". If you're riding for that period is done on the same road, at the same time of day to work and back, then it is limited experience. You could arguably spend the entire six months not riding at all. If you're riding all over the state in vastly different conditions, then that will garner a lot more experience."*

*"If you show enough skill and aptitude so soon after Level 1, then why not progress? A lot of people getting their motorcycle licence have actually been riding for many years, and while riding on the farm or competing in motocross is not riding on the road, familiarity with operating the machine is high."*

#### *Zero BAC for R-Date riders*

*"There is no argument that alcohol impairs your ability to operate a motor vehicle, but the same BAC reading affects different people to different extents."*

*"The argument against this proposal is one of principle. If they have spent the last few years operating a motor vehicle under the 0.05 limit, why reduce this limit to zero for a short period of time when they first ride a motorcycle? Don't forget, not all new motorcyclists are necessarily young road users."*

#### *Licensing and training for riders of mopeds*

*"While we agree with this proposal in principle, we strongly recommend that a separate course for a scooter/moped is introduced with no upper or lower limit on capacity. That is to say that any powered two wheeler (PTW) deemed to be a scooter, regardless of its cubic capacity, comes under the scooter course."*

*"At the moment, you can get a motorcycle licence on a small capacity scooter that does not have a clutch (meaning an automatic gearbox), and can then swap to a manual gearbox motorcycle without undertaking additional training for it. This is a significant deficiency that this proposal would eliminate."*

*"These types of PTWs generally are automatic, and another course should be required to progress to a manual PTW. Consideration should be given to completion of a scooter course counting towards potential for progression to a proper motorcycle."*

### *Pillion passenger ban on R-Date*

*“There is no data suggesting that this situation causes problems, so surely there is no need to change it? The advantage of being able to take a fully motorcycle-licensed pillion is that the pillion is in a position to critique the learner rider.”*

*“Since motorcycles are currently registered as “solo”, why can’t this be extended to licensing? That is to say, give motorcyclists the option to specify that they carry pillions or ride exclusively solo, with a registration and Compulsory Third Party discount for those who do not carry a pillion. There are motorcycles on the market that only have one seat, pillion pegs are easily removed from motorcycle, and a variance to their registration can be easily policed.”*

### *Explore options for a Motorcycle Safety Fund*

*“Unless we get iron-clad, legislated guarantees that this money will be spent solely on motorcycle specific projects, and that the spending is controlled by the motorcycle community (or at least motorcycle community representatives who have no affiliation with government) then I consider this to be nothing more than a discriminatory tax on anyone who has a licence endorsed with ‘BIKE’.”*

Rather than as a general provision applying to riders, Garage Motorcycles recommended revenue for a possible fund be raised from all motorcyclist offence expiation fees.

Identical submissions were received from **Harley Heaven, Hyosung Australia, Peter Stevens Motorcycles (Morphett Vale and Adelaide), Piaggio Australia and Triumph Australia**. Their specific comments were:

### *Car licence before motorcycle learner’s permit*

*“We oppose this proposal for a number of reasons. In tough economic times and with the rising cost of living, this proposal discriminates against those who can no longer afford a car, however still require personal mobility to attend work where public transport is not always an option. This is further evidenced by the high sales of low-powered motorcycles.”*

*“Again with rising costs of living, motorcycles and scooters provide an environmentally friendly low-energy consumption vehicle for personal transport. The emphasis should be on education and training for all road users to make it safer for motorcycle and scooter riders, rather than simply reducing the accessibility to such a valuable transport option.”*

### *Six months between Basic and Advanced Rider Safe*

*“We do not oppose this proposal.”*

### *Zero BAC for R-Date riders*

*“We do not oppose this proposal.”*

### *Licensing and training for riders of mopeds*

*“We oppose this proposal as it is currently written. We would support this proposal if the legislation for “moped” was altered to include “mopeds and scooters up to 160cc” and this would fulfil your stated purpose of bringing South Australia into line with New South Wales.”*

### *Pillion passenger ban on R-Date*

*“We oppose this proposal as it is currently written. Our preferred proposal would allow riders to carry a pillion at R class licence endorsement, or 12 months from passing the Advanced Rider Safe course and receiving a restricted licence.”*

### *Explore options for a Motorcycle Safety Fund*

*“We oppose this proposal as it is currently written. We [would] support it if amended to ‘Explore options for a Motorcycle Safety Fund dedicated to motorcycle safety initiatives from existing revenue and not from an additional financial impost on motorcycle licence fees or motorcycle registration fees’.”*

These motorcycle retailers also jointly commented, *“...these six proposals only focus on new riders and the effect will take many years to filter through the rider population.”*

The **Honda Australia** submission stated at the outset:

*“Honda would encourage national uniformity with relation to training and licensing requirements, and request that any changes have the research evidence to warrant their implementation.”*

Additionally, it noted, *“In South Australia between 2002-2011, the average change of a negative 7.9% reduction in fatalities is comparatively the second best state result, and better than the national average reduction of 6.7% (Bureau of Infrastructure, Transport and Regional Economics: Road Deaths Australia, 2011 Statistical Summary).”*

Honda Australia’s comments on the six proposals included:

#### *Car licence before motorcycle learner’s permit*

*“Other Australian jurisdictions which have introduced this requirement have yet to produce data to show if there is a road safety benefit as a result. The most likely outcome of this measure would appear to be that fewer young riders will be eligible to obtain a motorcycle permit, and therefore the corresponding lower exposure rates would translate to fewer crashes.”*

Honda Australia then stressed the need for improved higher order skills in novice riders, particularly being able to recognise and predict hazards before they become a real risk.

#### *Six months between Basic and Advanced Rider Safe*

*“Honda does not believe that a lengthy learner’s permit duration on its own will necessarily improve rider safety outcomes... if the learner period was extended, some novice riders would then go even longer without riding, and therefore not improve or practice prior to attempting the licence level. A NSW study into riding experience (hours) during the learner rider period established that simply doubling the duration of the learner period would not equate to a doubling of the hours ridden (Liz de Rome et al 2010). Honda would encourage South Australia to follow the accepted ‘Best Practice’ model from NSW. This is a three month minimum duration.”*

#### *Zero BAC for R-Date riders*

*“Honda agrees that riders on a restricted motorcycle licence, should not have any alcohol in their system while riding.”*

#### *Licensing and training for riders of mopeds*

*“Honda agrees that moped riders would benefit from a basic rider training course, but we believe this should incorporate a module on defensive riding strategies specific to riding a small and comparatively slower vehicle in different traffic situations. We encourage national uniformity and [recommend] that South Australia follow the scooter licensing regulations of NSW, where riders of mopeds and scooters up to 160cc are required to attend the ‘Pre-Learner Course’.”*

#### *Pillion passenger ban on R-Date*

*“Honda agrees that R-Date licence riders should not carry a pillion passenger.”*

#### *Explore options for a Motorcycle Safety Fund*

Honda Australia remarked that the majority of Victoria’s safety levy is spent on road treatment and black spots, with very little spent on safety issues such as crash research, rider education or improving licensing measures. Honda also said it considers funding such road treatments should come out of each state government’s road improvement funding program and not directly from riders, adding, *“No other group of road users is forced to pay to improve the road network in this way.”*

**Italian Motorcycles** made the following comments:

#### *Car licence before motorcycle learner’s permit*

*“Motorcycling is a cheap and economical form of transport for many young people including late school pupils, students, apprentices, young workers etc. This proposal makes it harder for young people to find economical transport.”*

#### *Six months between Basic and Advanced Rider Safe*

*“I have no issue with this or increased training requirements but also believe all people going for car licences need some motorcycle awareness training.”*

#### *Zero BAC for R-Date riders*

*“This is reasonable.”*

### *Licensing and training for riders of mopeds*

*“When many bicycles travel at speeds in excess of what most mopeds are capable of this seems discriminatory, but some basic training is reasonable, but should be equally applied to bicycles.”*

### *Pillion passenger ban on R-Date*

*“This is reasonable.”*

### *Explore options for a Motorcycle Safety Fund*

*“At present, many motorcycle accidents are actually the fault of car drivers, more action needs to be taken to educate car drivers for motorcycle safety. I have yet to see any steps taken to do this, the focus is always on motorcycle riders. This does not solve the base cause of many accidents and poses increasing financial burdens on motorcyclists. Why is there no levy or training for car drivers to pay for damage caused to motorcyclists.”*

The **Motorcycle Riders Association (MRA)**'s comments included:

### *Car licence before motorcycle learner's permit*

*“The basis for this approach is flawed. The intention to have new riders gain road skills prior to applying for a motorcycle licence does not appear to take into account the average age of novice riders. Research from a Queensland study found ‘novice riders’ does not necessarily mean ‘young’ riders as the average age at the time of obtaining a learner licence was 33 years old. Of the younger riders who do apply for a motorcycle licence, their choice is often based on financial reasons. They include apprentices, trainees and university students. The purchase and ongoing costs of running a car are far greater than the equivalent motorcycle cost. These riders and their career prospects would be unfairly disadvantaged under this proposal.”*

### *Six months between Basic and Advanced Rider Safe*

*“The existing recommendation for six months separation between levels is supported. This does not need to be made into a mandatory minimum time frame. Riders who have not acquired the riding skills to pass the [Ride Safe] competency test will not be able to progress.”*

### *Zero BAC for R-Date riders*

This proposal is supported.

### *Licensing and training for riders of mopeds*

In supporting this proposal, MRA said that in rider training riders learn more than they expect and are safer with these skills and knowledge, and added, *“Knowing how to drive a car does not enable a road user to safely ride a motorcycle. The NSW system is a good example for South Australia. It is based on a one day specific scooter course that enables an automatic motorcycle of up to 160 millilitres to be ridden for around half the price of the full course. The option of undertaking a further one day course at a later date to upgrade to a full motorcycle licence would be highly worthwhile.”*

### *Pillion passenger ban on R-Date*

This proposal is supported.

### *Explore options for a Motorcycle Safety Fund*

The MRA said it agrees with the AMC that a levy on motorcyclists is discriminatory, adding, *“We do not believe a levy is required to improve rider safety... An increased focus on education, training and sharing the road would benefit all road users, not only motorcycle riders. These, and many other worthy programs, do not require a levy.”*

The MRA also said that if more funding is needed, the association would support the Ulysses Club's alternative funding model based on fines being directly allocated to motorcycle safety initiatives.

The MRA also commented on the MAC's motorcycle safety campaigns, Ridersafe fees, private providers of motorcyclist training, and refresher and advanced training.

**Motorcycling South Australia (MSA)** made the following comments:

*Car licence before motorcycle learner's permit*

*"Motorcycling South Australia strongly disagrees with this proposal. The adoption of this initiative would significantly limit the transportation mode of many individuals, particularly those in rural locations, where a motorcycle represents an affordable means of transport, and as a learner, a degree of independence from the reliance on parents of full licence holders to travel with them."*

The MSA added that the emphasis in new motorcycle safety initiatives should be on older riders, that is the group who poses the greater crash risk.

*Six months between Basic and Advanced Rider Safe*

*"Motorcycling SA supports the principle of this proposal, however recommends a review/re-focus of the training courses to achieve relevant training to licence holders."*

MSA then detailed how it considers such courses should be structured.

*Zero BAC for R-Date riders*

*"Motorcycling SA supports this proposal."*

*Licensing and training for riders of mopeds*

*"Motorcycling SA supports this proposal."*

*Pillion passenger ban on R-Date*

*"Motorcycling SA supports this proposal."*

*Explore options for a Motorcycle Safety Fund*

*"Motorcycling SA would question what initiatives are likely to be 'motorcycle specific' and therefore the targeting of motorcycle licence holders or registrations is likely to be discriminatory. Most road safety initiatives will most likely have a flow on benefit to all road users, even if targeted at a particular user group. Should additional funding for motorcycle specific safety improvements be required, it is suggested that it be drawn from a broader Road Safety Fund for all road users, with the allocation based on priority."*

The **Suncorp Group** motor insurance company (InsureMyRide)'s comments included:

*Car licence before motorcycle learner's permit*

*"At this time, InsureMyRide is not aware of sufficient evidence to either support or oppose this proposal... It is important to recognise that safe riding requires substantially different skills and behaviours to that of safe driving and InsureMyRide suggests waiting for further evidence to emerge from Queensland before adopting this proposal."*

*"As noted in the Discussion Paper, 88% of motorcycle riders had already acquired a car licence in March 2012. InsureMyRide highlights the outstanding 12% of riders that have presumably decided to first obtain a motorcycle licence due to cost, convenience or personal preference. This proposal would substantially increase the cost of licence acquisition for these riders and we believe this will lead to an increase in unlicensed riders on South Australian roads."*

*Six months between Basic and Advanced Rider Safe*

*"InsureMyRide supports this proposal. As outlined on page 11 of the Discussion Paper, this measure would eliminate the current situation where a licensed driver could theoretically complete both courses in a short period of time and thereby avoid some or all of the time spent under learner licence conditions."*

*"A six month minimum period between the Basic and Advance Rider Safe training courses will ensure learner permit conditions such as limited power-to-weight ratios and display of L-plates achieve their policy aims. The minimum time period will also increase the probability of a novice rider experiencing poor weather and other hazardous riding conditions while riding under the lower risk learner licence conditions."*

### Zero BAC for R-Date riders

*“Effectively banning alcohol consumption for inexperienced riders is a positive step, and in line with similar restrictions imposed throughout Australia. As well as encouraging safer rider behaviour on South Australian roads, this change may increase regulatory uniformity across jurisdictions and classes, hopefully ensuring South Australian riders do not unintentionally breach the laws of other states and territories.”*

### Licensing and training for riders of mopeds

*“While mopeds are less powerful than motorbikes and have a substantially lower top speed, the level of skill and knowledge required for safe operation of both types of vehicle is similar. Due to the similarity across both types of vehicle, InsureMyRide supports aligned licensing requirements, with generally lower requirements for mopeds in recognition of their limited speed and power. InsureMyRide is particularly supportive of a requirement for moped riders to attend the Basic Rider Safe course. Car drivers often lack the basic braking, cornering and speed control skills required to operate a motorcycle or moped safely. In particular, drivers that have gained a car licence only in vehicles fitted with Anti-lock Braking Systems (ABS) can find the transition to manual braking on mopeds challenging, placing them at high risk. The Basic Rider Safe course would be an affordable and practical way to ensure these riders are educated with the skills and knowledge to ride safely.”*

### Pillion passenger ban on R-Date

*“InsureMyRide supports this proposal. Carrying a pillion passenger significantly changes the handling characteristics of motorcycles and effectively doubles the risk exposure should an accident occur. It is appropriate to restrict the carriage of pillion passengers to riders who have gained the experience associated with an R class licence endorsement. A key outcome of the proposals in our view will be to increase the minimum age of a rider permitted to carry a*

*pillion passenger which will substantially improve pillion passenger safety.”*

### Explore options for a Motorcycle Safety Fund

*“A dedicated motorcycle safety fund has been successfully implemented in both Victoria and New Zealand and would likely lead to substantial safety improvements for South Australian riders. In recognition of the additional cost impost of a new levy on motorcycle riders, InsureMyRide believes it is crucial that any new levy be designed and maintained as a fair, transparent and risk-based levy that is shown to deliver genuine safety improvements for riders. Without careful design and management, a new levy could result in inequitable outcomes for motorcycle owners that would not be supported by InsureMyRide.*

*InsureMyRide is acutely aware of the substantial social, emotional and economic costs of road accidents and commends the South Australian Government for their continued commitment to road safety.”*

InsureMyRide then discussed in detail a number of features of an equitable levy scheme and how they could be achieved. It also suggested that former riders who return to riding and complete refresher training are rewarded for doing so. This incentive could be provided by way of a discounted motorcycle safety levy, should it be adopted.

The **Ulysses Club** made a detailed submission with comments including:

### Car licence before motorcycle learner's permit

*“The Ulysses Club is not aware of any road safety benefits which can be achieved by implementing this proposal. It is noted in the graph in Figure 2 of the Discussion Paper that historically the number of 16 year old casualties is very low and is in fact similar to that of 77 year old riders. The average age of a novice rider attending the compulsory Ridersafe training for the first time is 32 years. 88% of these novices already have a car licence and presumably will have already*



*benefitted from the experience gained from driving a car. This proposal will have little impact on the majority of novice riders, but will discriminate against the younger riders."*

*"We could learn from many European and Scandinavian countries where 15 year olds can apply for a moped licence, graduate to a 'power to weight' limited motorcycle licence at age 16 and ride a more powerful motorcycle later if they desire after completing a further probationary licence period. This model allows novice riders to gain valuable road experience while going through these graduated licensing steps."*

*"Motorcycling is an affordable means of transport, and, for many young people, it is their only means of transport. They rely on their motorcycle for personal transport and to commute to work or to University, Trade School or other tertiary education facilities. Many young people cannot afford to purchase a good late model car and to run it and maintain it safely. Young people who are denied the opportunity to own a motorcycle will be forced to purchase a cheap car for transport duties and will have to ensure that they are accompanied by a licensed driver when commuting. Cheap cars are usually older cars which are a lot less safer than new cars."*

*"There are environmental benefits to be gained through the increased use of alternate forms of transport including motorcycles. Any proposal that delays the uptake of motorcycling amongst young people could have the flow on effect of achieving an overall reduction in the number of people who use more environmentally friendly alternate forms of transport both now and later in life."*

#### *Six months between Basic and Advanced Rider Safe*

*"The first 9 to 12 months after gaining a motorcycle learner licence is the most critical time in a novice rider's development. This is when a novice rider is at most risk. The attachment of an 'L' plate is seen as adding to the protection of a learner rider as other road users can see that this is a novice and to respect his or her space. A six-month minimum period on "L's" is world's best practice."*

#### *Zero BAC for R-Date riders*

*"Motorcycle riding is a highly skilled activity and any reduction in capacity through drugs and alcohol should be avoided at all costs. This proposal will then align riders with drivers in the prescribed BAC concentrations allowed."*

#### *Licensing and training for riders of mopeds*

*"No rider should not be allowed on a public road without some form of compulsory training. Riding a motorcycle requires a high level of skill especially in road craft and braking expertise. Scooters and moped riders also require these skills. The value of wearing protective clothing is taught at Rider Safe and we see many scooter riders within the CBD riding without the added protection of appropriate clothing. Although scooter riders are rarely fatally injured (they generally travel at lower speeds) the numbers admitted to hospital as a result of a crash are over represented. Abrasion injuries are common because of the lack of protective clothing."*

*"We would like to see South Australia adopt the scooter licensing system currently used in NSW. The NSW scheme is for riders of scooters up to and including a capacity of 160 millilitres who must successfully complete a specific compulsory scooter course. The NSW system has the added advantage of largely eliminating the 50 millilitres capacity scooter or moped from the roads. These machines can barely keep up with urban traffic and riders are often forced to ride illegally in bikeways so as to not be hit from the rear. They are slow to leave the traffic lights and have a limited life because of the high revs of the motor needed to produce sufficient power. The cost of a 100 to 160 millilitre scooter is not all that much more than a 50 millilitre scooter. It is realised that some 'holiday scooter' hiring business will suffer to the point of no longer being viable if this recommendation is implemented in SA. However, the number of crashes by those hiring a scooter is high because of the lack of riding skills (and possibly combined with some riders' poor attitudes to the hiring event)."*

*"If this 'scooter licence' proposal is implemented, we do not believe we will see a significant lowering of scooter sales in this State."*

#### *Pillion passenger ban on R-Date*

*"The addition of a pillion passenger severely alters the dynamics of a motorcycle. Braking distances, acceleration and handling are all compromised with the addition of a pillion passenger. It can be likened to the additional effects of towing a caravan on the performance of a vehicle. Novice riders do not need the extra burden of being responsible for the safe passage of another human during their first 12 months."*

#### *Explore options for a Motorcycle Safety Fund*

*"The Ulysses Club supports an alternative fund raising scheme but not from a levy on motorcycle licenses or registrations. Currently, South Australian riders pay existing fees through the compulsory Third Party Insurance scheme, petrol tax and registration, the same as any other road user. Why should riders pay additionally for their own safety? How much do bicycle riders pay towards their safety as fellow vulnerable road users – their fatality numbers are compatible to those of motorcyclists?"*

*"Victoria has had its motorcycle levy in action for over 10 years and we see that that State has a fatality rate some 10% lower than SA and Australia as a whole. This shows that a specific pool of funds allocated to motorcycle specific projects can contribute to improvements...."*

*"It is envisaged that in South Australia 2012 /2013, some \$90M will be raised from speeding fines from all road users. The Government has stated that these funds will not be going into state coffers but will go specifically to road safety initiatives. As motorcyclists comprise 4% of the road population (and 11% of the total population of South Australia), we would welcome this proportion of collected revenue to be spent on motorcycle safety initiatives. This would equate to approximately \$3.6M on a road user basis or \$9.9M on a licence holder basis."*

*"Appropriately, motorcyclists who flaunt the law will be funding their own safety initiatives and are the ones who would benefit the most."*

The **Women's International Motorcycle Association** made the following points:

#### *Car licence before motorcycle learner's permit*

*"Young drivers especially need time to know the road rules, learn how to travel in heavy traffic, and how to adjust their speed into corners while driving a car. Then, when riding a motorcycle, which is more difficult to handle, young riders have learnt these things already."*

#### *Six months between Basic and Advanced Rider Safe*

*"...some riders do not always have time to go out on their motorcycles after receiving their learner's permit and the times they have been out on the road in 4 months may not have been many."*

#### *Zero BAC for R-Date riders*

*"Riding a motorcycle requires a lot of skill so inexperienced riders definitely should have a zero BAC to keep control of their bike."*

#### *Licensing and training for riders of mopeds*

*"This is definitely something that is needed. Students who come to this country do not always have the time or money to get a car licence and getting a full motorcycle licence is also costly. A scooter/moped licence would improve safety for those who have not ridden one before."*

#### *Pillion passenger ban on R-Date*

*"Members agree with this proposal."*

#### *Explore options for a Motorcycle Safety Fund*

*"We already pay registration fees which should cover the proposed levy. What about cyclists they pay nothing and are involved in many accidents. Why should we motorcyclists be targeted? We should be treated the same as car drivers."*

The **Zoot Scooters and Bikes** submission was exclusively focused on the proposal for licensing and training of moped riders, with comments including:

*“When surveyed at the time of purchasing their new moped almost all of our customers list the reasons for purchase as: low cost of travel; convenience and ease of parking; reduced pollution; ease and convenience of purchase.”*

*“...today most of our clients are from families that have two parents working, two children at school, a mortgage on the home and simply cannot afford the luxury of two motor cars. Generally it is the father of the family that rides the moped to work and back every working day.”*

*“It is possible for a customer to come into our store bearing a car driver’s licence (class C) and within less than an hour leave with a fully registered operational moped, thanks to the current licensing laws and EzyReg, of which we are authorised delegates. The proposed changes would put a complete stop to the moped purchaser who is looking for a fast low cost and easy to implement solution that can be carried out in a short amount of time.”*

Zoot reported it had surveyed scooter suppliers interstate who have commented that once moped licensing is introduced; there is little reason to purchase a 50cc scooter. In states where new low-power scooter riders are required to be licensed and trained, purchasers generally buy scooters of greater engine capacity than moped size, adding to a trend of riders choosing motorcycles rather than scooters. Zoot concluded that implementing a ‘moped only’ licence would largely preserve the moped market.



Road Safety & other organisations	<ul style="list-style-type: none"> <li>- Australian Driver Trainers Assoc</li> <li>- Business SA</li> <li>- Country Fire Service Volunteers Assoc</li> <li>- Federal Chamber of Automotive Industries</li> <li>- Royal Automobile Association</li> </ul>	<ul style="list-style-type: none"> <li>- Australian Driver Trainers Assoc</li> <li>- Business SA</li> </ul>	<ul style="list-style-type: none"> <li>- Australian Driver Trainers Assoc</li> <li>- Federal Chamber of Automotive Industries</li> </ul>	<ul style="list-style-type: none"> <li>- Australian Driver Trainers Assoc</li> <li>- Business SA</li> </ul>	<ul style="list-style-type: none"> <li>- Australian Driver Trainers Assoc</li> <li>- Federal Chamber of Automotive Industries</li> </ul>	<ul style="list-style-type: none"> <li>- Australian Driver Trainers Assoc</li> <li>- Federal Chamber of Automotive Industries</li> </ul>
Local Government	<ul style="list-style-type: none"> <li>- Wattle Range Council</li> </ul>					
Members of Parliament						
Motorcycle rider groups / industry	<ul style="list-style-type: none"> <li>- Australian Motorcycle Council</li> <li>- Garage Motorcycles</li> <li>- Harley Heaven</li> <li>- Hyosung Australia</li> <li>- Italian Motorcycles Association</li> <li>- Motorcycle Riders Association</li> <li>- Motorcycling SA</li> <li>- Peter Stevens</li> <li>- Piaggio Australia</li> <li>- Suncorp</li> <li>- Triumph Australia</li> <li>- Ulysses Club</li> </ul>	<ul style="list-style-type: none"> <li>- Harley Heaven</li> <li>- Hyosung Australia</li> <li>- Peter Stevens</li> <li>- Piaggio Australia</li> <li>- Triumph Australia</li> <li>- Zoot</li> </ul>	<ul style="list-style-type: none"> <li>- Garage Motorcycles</li> <li>- Harley Heaven</li> <li>- Hyosung Australia</li> <li>- Peter Stevens</li> <li>- Piaggio Australia</li> <li>- Triumph Australia</li> </ul>	<ul style="list-style-type: none"> <li>- Australian Motorcycle Council</li> <li>- Garage Motorcycles</li> <li>- Harley Heaven</li> <li>- Honda Australia</li> <li>- Hyosung Australia</li> <li>- Italian Motorcycles Association</li> <li>- Motorcycle Riders Association</li> <li>- Motorcycling SA</li> <li>- Peter Stevens</li> <li>- Piaggio Australia</li> <li>- Triumph Australia</li> <li>- Ulysses Club</li> <li>- Women's International Motorcycle Association</li> </ul>		
Road Safety & other organisations	<ul style="list-style-type: none"> <li>- Country Fire Service</li> <li>- South Australian Farmers Federation</li> </ul>	<ul style="list-style-type: none"> <li>- Country Fire Service</li> <li>- Country Fire Service Volunteers Assoc</li> <li>- South Australian Farmers Federation</li> </ul>	<ul style="list-style-type: none"> <li>- Country Fire Service</li> <li>- Country Fire Service Volunteers Assoc</li> <li>- South Australian Farmers Federation</li> </ul>	<ul style="list-style-type: none"> <li>- Australian Driver Trainers Assoc</li> <li>- Country Fire Service Volunteers Assoc</li> </ul>	<ul style="list-style-type: none"> <li>- Country Fire Service</li> <li>- Country Fire Service Volunteers Assoc</li> <li>- South Australian Farmers Federation</li> </ul>	<ul style="list-style-type: none"> <li>- Country Fire Service</li> <li>- Country Fire Service Volunteers Assoc</li> <li>- South Australian Farmers Federation</li> </ul>
Local Government						
Members of Parliament	<ul style="list-style-type: none"> <li>- Minister's Youth Council</li> </ul>					
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NON-SUPPORT						
NOT CLEAR/NO RESPONSE						

