

Amended B Driving Licence above 3.5 tons is necessary across Europe

Proposal for extending the B Driving Licence for Motor Caravans to 4.25 tons

This proposal is coordinated by the European Caravan Federation (ECF) and is supported by all 13 members. The ECF is the umbrella organisation representing the national organisations of the European Caravanning Industry.

Summary

Motor caravan tourism should be accessible to all generations and without any unnecessary restrictions. Therefore, all holders of the B driving licence should be given the opportunity to drive vehicles up to 4.25 tons for private use.

The current EU driving licence law requires a person driving a motorhome above 3.5 tons for private use to obtain a driving licence for commercial purposes (C1 or C). **The C1/C licence is inappropriate, unduly burdensome, complex and time-consuming for private use.**

Today, the B driving licence entitles a person to drive vehicles with a gross vehicle weight of up to 3.5 tons. At the same time, **because of safety and environmental equipment, which is required by EU law, motor caravans are getting heavier and surpass the 3.5 tons limit of the B driving licence.** In addition, motor caravans are also becoming more comfortable. Manufacturers have tried to compensate on behalf of motorhome owners by introducing expensive lightweight construction methods and whilst this has slowed this trend, it is proving more difficult to remain within the 3.5 tons limit.

Accident statistics do not justify the restriction of 3.5 tons for motor caravan enthusiasts. The number of motor caravans involved in accidents is extremely low across all weight classes.

Alternatively fuelled motor caravans are not yet available. Some small and compact electric motor caravans will enter the market soon. However, alternative propulsion systems have the potential of entering the main motor caravan market in greater quantity towards the end of the decade but only if and when new driving licence categories take into consideration already known technical constraints and the additional weight of such systems.

“E-Caravans” with own motion power provided by batteries will enter the market to compensate the reduced towing capacities of electric towing vehicles also at some point of time. Therefore, it will then be necessary to compensate the environmental contribution of the E-Caravan by considering the additional e-system weights. Once these E-Trailers are ready for type approval, the driving licence directive should be amended accordingly.

Background:

EU Type Approval¹ qualifies motor caravans the same as passenger cars - “M₁ vehicles” which are intended for the transport of persons (no more eight passengers in addition to the driver) and their luggage. Motor caravans are privately used for recreational purposes. The number of passengers is the main criteria to differentiate between the different M category of vehicles (M₁: passenger car; M₂, M₃: busses). As motor caravans exceed 3.5 tons, the vehicle weight requirements for the category B driving licence are not corresponding to the type approval regulations for some heavier M₁ vehicles and these should be aligned.

The 3rd Driving Licence Directive² defines category B motor vehicles with a maximum authorised mass not exceeding 3.5 tons and designed and constructed for the carriage of no more than eight passengers in addition to the driver. Driving licence categories C1 and C are principally intended for the professional transport of goods.

Motor caravans with a weight up to 3.5 tons can be driven with a B driving licence. Above 3.5 tons driving licence C1 (up to 7.5 tons) is necessary, regardless if the vehicle is used for private and leisure purposes or has the same or very similar dimensions. The difference between 3.5 tons and 7.5 tons is excessive as approx. 95% of the motor caravans would fall within 4.25 tons.

Directive 2012/36/EU³ acknowledges that “Contrary to category C vehicles, which are dedicated to professional transport of goods, category C1 is heterogeneous and includes a wide range of vehicles, such as vehicles for leisure or personal use, emergency or fire- fighting vehicles, or utility vehicles used for professional purposes but where driving is not the principal activity of the driver” (recital 2). Unfortunately, C1 and the newly introduced C1 97 are almost identical in technical requirements. Hence, driving licence C1 97 was as inappropriate for private use as the C1 has always been.

The European Caravan Federation ECF therefore calls for a sustainable and future-oriented supplement to European driving licence law. Private use driving licences for over 3.5 tons must not be based on a commercially focused driving licence such as class C1. For private use the driving licence class B is necessary.

Proposal:

The weight limit of driving licence category B should be extended to 4.25 tons provided that the use is for private use.

¹ REGULATION (EU) 2018/858 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 30 May 2018 on the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles, amending Regulations (EC) No 715/2007 and (EC) No 595/2009 and repealing Directive 2007/46/EC.

² DIRECTIVE 2006/126/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 20 December 2006 on driving licences (Recast).

³ DIRECTIVE 2012/36/EU of 19 November 2012 amending Directive 2006/126/EC of the European Parliament and Council on driving licences.

Justification:

- **15% are above 3.5 tons.** 2.2M motor caravans were on the road in Europe in 2019. From 1995 to 2020, the annual registration rose from 30,000 to 161,000 motor caravans. Approx. 85% of the more recently registered motor caravans are at the 3.5-ton thresholds. It is estimated that the number of motor caravans above 3.5 tons would rise significantly once the B driving licence is amended to 4.25 tons and allow to meet the growing demands of customers.
- **The road safety of motor caravans is excellent⁴.** The BAST study (Federal Highway Research Institute, Germany) confirms a very positive result. In 2013, less than 0.3 percent of all accidents involved personal injury being caused by motor caravans. Accidents involving motor caravans are not an urgent road safety problem when considering both the absolute number of accidents and the mileage-related accident risk.
- **Actual accident figures prove the excellent road safety of motor caravans.** In Germany, the accident statistics for motor caravans have been analysed on an annual basis by the Federal Highway Research Institute (BAST) since 1997. Similar to previous years, these statistics are at a very low level. In 2019, of a total of 439,990 motor vehicles involved in accidents with personal injury, 977 motor caravans were involved. The share all accidents involving personal injury being caused by motor caravans has once again declined slightly in the last decade and now amounts to 0.2%.
- **European wide figures are not available.** Motor Caravans enjoy a good safety record in many Member States so much so that many European Governments have not seen the need to itemise motor caravan accident statistics separately from cars and goods vehicles. This confirms the excellent safety record because they are not seen as a special risk.
- **The number of driving licence holders without a suitable driving licence over 3.5 tons for private use is growing.** In Member States without vested rights, there are already no suitable driving licences for private use over 3.5 tons. In member states, with preservation of vested rights, the holders of a suitable driving licence are now at least 40 years old. Many of those start thinking about motor caravan travel, especially in these times, when caravanning is one of the safest forms of travel.
- **The driving behaviour of motor caravan drivers has a direct influence on road safety.** Motor caravans are usually driven during the day, for private purposes and at "holiday speed". There is no evidence to suggest that motor caravans with a mass of 4.25 tons or 4.5 tons are significantly more difficult to drive than 3.5 tons vehicles.
- **The dimensions (length, width, height) of motor caravans with 3.5 tons or 4.25 tons are identical.** Even motor caravans with a total mass of 4.5 ton are usually identical to those of 3.5 ton. Motor caravans above 3.5 tons generally only have a modified chassis to allow for more consumer payload. The overall appearance (length, width, height) of 4.25 tons or 4.5 tons motor caravans is usually identical to that of 3.5 tons motor caravans.

⁴ BAST Heft M 236 – Unfallbeteiligung von Reisemobilen 2000-2010

- **The masses of motor caravans are constantly increasing.** In addition to increasing safety and environmental equipment -which is required by EU law, customers' ever-increasing demands for comfort are also leading to increasing vehicle masses. Whilst lightweight construction slows down this trend it is limiting consumer payloads which risks the potential of overloading.
- **Alternatively fuelled motor caravans** will need a further increased total mass of more than 4.25 tons to compensate the additional weight of the alternative propulsion system (batteries etc.). To date, almost all motor caravans run on Diesel. Unlike the passenger car market, light commercial base vehicles used for motor caravans will not offer, in the short-term, appropriate solutions with regard to vehicle range and added weight. The necessary motor caravan payload will be minimised by the alternative propulsion system (e.g., batteries). Therefore, the already existing legal framework, Directive 2018/645/EU⁵, needs to be amended for private vehicles. As a matter of fact, shifting the B driving licence weight limit from 3.5 tons to 4.25 tons does not offer any advantage to privately used motor caravans if the 750 kg of new payload are attributed to the alternative propulsion only.
- **Caravanning is good for the climate.** In a new study, the greenhouse gas emissions of various forms of vacation have been analysed. According to the study, holidaying with a caravan or motor caravan emits less climate damaging emissions than air travel and hotel accommodation. Even rail travel does not necessarily have a much better climate balance. The study confirms, therefore, the findings of earlier studies conducted by the Öko-Institut^{6,7} (Germany) and Osfoldforskning⁸ (Norway).
- **Caravanning tourism brings an economic benefit of 23bn euros in turnover⁹.** Caravanning tourism is becoming increasingly important in European tourism. Tourists with motor caravans, caravans or tents generated a contribution of almost 23bn euros to the domestic economy in sales last year. The main driver is motor caravan tourism.

⁵ DIRECTIVE (EU) 2018/645 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 April 2018 amending Directive 2003/59/EC on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers and Directive 2006/126/EC on driving licences.

⁶ Schmied, Martin; Dr. Buchert, Matthias: Treibhausgas-Bilanzen für Reisen mit Motorcaravans. Abschlussbericht des Öko-Institutes für den Caravan Industrie Verband e.V. Berlin: 2006.

⁷ Bleher, Daniel: Vergleichende Klimabilanz von Motorcaravanreisen-heute & morgen. Abschlussbericht des Öko-Institutes für den Caravan Industrie Verband e.V. Darmstadt: 2013.

⁸ Brekken Andreas; Saxegard, Simon A.; Nilsen, Mona; Tellnes, Lars G.; The climate impact of taking one's own cabin on holiday A greenhouse gas account for motorhomes Ostfolfforskning, 2018.

⁹ Dr. Harrer, Bernhard, Spohrer, Moritz: Economic factor of tourism camping in selected European countries, dwif e. V., 2020.