

Caravanning: Making a sustainable form of holiday possible for millions of people

The European Commission's proposal for the revision of the EU Driving Licence Directive¹ has many promising aspects, in particular the proposed update of the driving licence category B to 4.25 t that finally addresses the missing private driving licence above 3.5 t. However, it falls short as only alternatively fuelled vehicles will be allowed to benefit from the extended driving licence category B to 4.25 t.

The road to a turnaround in vehicle propulsion is not paved by driving licences alone

Holidays with a motor caravan are sustainable^{2,3,4,5}, family-friendly and support the political and social desire that more people travel in a climate-friendly, earthbound way. This presupposes that as many people as possible can do this with a modern motor caravan. Today, these are safer and more environmentally friendly than ever. Simple, consumer- and climate-friendly regulations are needed to enable people to have a climate- and family-friendly holiday.

The European Caravan Federation welcomes the Commission proposal for a 4th Driving Licence Directive as it will play its major role in improving road safety and the free movement of citizens. But: **The B driving licence must be accessible to all motor caravans up to 4.25 t.** The planned restriction to alternative propulsion systems does not ensure any real progress in the question of how quickly alternatively fuelled vehicles will enter the market.

Environmentally friendly Caravanning should be accessible also to motor caravans up to 4.25 t – and not only to alternatively fuelled vehicles.

ECF proposes to change Article 9 Paragraph 2 (h) as follows:

(h) two years after a driving licence, granted for category B, was issued for the first time it shall be valid for driving the alternatively fuelled vehicles referred to in Article 2 of Council Directive 96/53/EC **and motor caravans**⁶ with a maximum authorised mass above 3 500 kg but not exceeding 4 250 kg without a trailer

¹ COM(2023) 127 final https://transport.ec.europa.eu/system/files/2023-03/COM_2023_127.pdf

² Schmied, Martin; Dr. Buchert, Matthias: Treibhausgas-Bilanzen für Reisen mit Motorcaravans. Abschlussbericht des Öko-Institutes für den Caravan Industrie Verband e.V. Berlin: 2006.

³ Bleher, Daniel: Vergleichende Klimabilanz von Motorcaravanreisen-heute & morgen. Abschlussbericht des Öko-Institutes für den Caravan Industrie Verband e.V. Darmstadt: 2013.

⁴ 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.

⁵ Bergk, Fabian; Biemann, Kirsten; Kämper, Claudia; Kräck, Jan; Knörr, Wolfram: Klimabilanz von Reisen mit Reisemobilen und Caravans. Vergleich von typischen Campingreisen mit weiteren Verkehrsmittel- und Übernachtungsmöglichkeiten. Heidelberg, 2020.

⁶ Motor caravans are defined in Regulation (EU) 2018/858 Annex I Part a 5.1 as M1 SA special purpose vehicles: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0858>, OJ, L 151, 14.06.2018, p. 72.

Tendency towards more weight is not a question of the propulsion

Weight is not a luxury issue! On the contrary, the base vehicles of motor caravans have become heavier in recent years due to safety and environmental equipment, most of which is required by EU law (base vehicle weight increase by 350 kg in 20 years). Therefore, the moderate increase to 4.25 t is necessary, but not because of the impending change in propulsion systems, but for all vehicles.

Motor caravan enthusiasts have been awaiting concrete solutions to one of the biggest challenges to privately used vehicles: A missing driving licence above 3.5 t for private, personal or leisure use. The Commission itself had recognised this problem and tried to solve it as early as 2012⁷. However, the facilitations only applied to C1 licences and were therefore not usable for the B licence.

Holidaying with motor caravans is safe

There is no safety-related obstacle to a general increase in weight limits as the **road safety of motor caravans is excellent**^{8,9}. Two BAST studies (Federal Highway Research Institute, Germany) confirm a very positive result. It should be noted that in Germany alone 30 % of all European motor caravans are registered and the BAST surveys are therefore very representative. Despite the strong stock increase of 107 % new motor caravans in the past 10 years¹⁰, the number of accidents with injuries and fatalities remained at a constant, very low level. With a share of 0.4 percent, motor caravans do not represent a focal point in the accident occurrence.

A similar picture emerges when looking at the 6 European countries where road accidents with personal injuries involving motor caravans are statistically recorded¹¹. With the 2nd BAST study ECF has extrapolated that about 0.15 % of all road fatalities in the EU were motor caravan passengers. Despite the strong increase in the number of motor caravans, these figures remain constant on a very low level in the last decade.

Motor caravan-pedestrian-accidents¹² with personal injury settled at a value of about 40 per year (in Germany; no further information available). According to BAST, a more detailed breakdown of the 40 accidents per year appears to be difficult due to the low number of cases. Statistically, it would simply not be possible to make any reliable statements.

There is no discernible safety-related obstacle to a general increase in the weight limits for all vehicles in view of the progress made in the field of safety and the environment: In essence, the difference in driving a 4.25 t motor caravan compared to a 3.5 t motor caravan is largely

⁷ COMMISSION DIRECTIVE 2012/36/EU of 19 November 2012 amending Directive 2006/126/EC of the European Parliament and of the Council on driving licences (OJ L321, 20.11.2012, p. 54).

⁸ BAST Heft M 236 – Unfallbeteiligung von Wohnmobilen 2000-2010 https://bast.opus.hbz-nrw.de/opus45-bast/frontdoor/deliver/index/docId/581/file/M236b_nur_ELBA.pdf.

⁹ BAST Heft M 334 – Unfallbeteiligung von Wohnmobilen 2010-2020 <https://bast.opus.hbz-nrw.de/frontdoor/index/index/docId/2735> <https://bast.opus.hbz-nrw.de/opus45-bast/frontdoor/deliver/index/docId/2735/file/M334+BF+Gesamtversion.pdf>

¹⁰ EU motor caravan stock: 1.35 Mio. (2012), 2.79 Mio. (2022), ECF figures.

¹¹ Austria, Germany, Italy, Norway, Sweden, Switzerland; see BAST Heft M 334, p. 42-45.

¹² BAST Heft M 334 – Unfallbeteiligung von Wohnmobilen 2010-2020, p. 24.

negligible, the accident and casualty figures are extremely low across all classes and not even remotely comparable with other modes of transport.

Caravanning: Eco-friendly and sustainable holidays

Although caravanning tourism achieves good sustainability values compared to other forms of holiday, the debate about the turnaround of vehicle propulsion also affects the entire chain, from the industry over the touristic service providers, to the many million caravanning enthusiasts.

Compared to a flight for a family of four, travelling by motor caravan (or caravan-passenger car combination) is not only much more climate-friendly, but it also supports regional development in many parts of Europe through a form of tourism that does not require large hotel complexes or further irreversible infrastructure. On the contrary: sustainable pitches ensure tourism progress, enable seasonal and thus sustainable use, but do not require, for example, any compulsory sealing of land.

We are part of the solution: propulsion turnaround does not depend on driving licence

The planned restriction on the permissible gross vehicle weight to alternative propulsion systems does not ensure any real progress in the question of how quickly alternatively fuelled motor caravans will enter the market.

The decisive factor will be the availability of technology and the development of base vehicles. Here, the industry will make massive progress, but for this it needs the support of politics as well. But: Only if we are attractive and accessible to many people, the industry can drive the propulsion turnaround with the necessary vigour and investment volume.

The future cannot be envisaged without considering the status quo

Until alternatively fuelled base vehicles for motor caravans are ready for the market and available across the board, good framework conditions are needed for the existing products and the people who use them responsibly and safely, especially since motor caravans are extremely durable, well-maintained vehicles with low mileage. Here we have a joint responsibility to ensure that many people can continue to use existing vehicles sensibly. This is also a question of sustainability.

People excluded from climate-friendly form of travel

In practice, B driving licence holders will face more difficulties in taking a climate- and family-friendly holiday with a [rental] motor caravan, because they do not have the right driving licence and do not want to acquire an additional permit for their holiday. In the EU, France, Germany and Sweden grant rights to all (private and commercial) older licence holders (> 40 years-old) to drive vehicles exceeding 3.5 t with the usual passenger car driving licence.

At a glance: The arguments for a moderate increase of the B driving licence to all motor caravans

1. **Caravanning supports sustainability goals:** Earthbound travel is intentional and should therefore be possible in a variety of ways. If more people travel earthbound and sustainably by motor caravan, this will help to achieve savings targets compared to air travel and support regions in Europe in a sustainable way. Excluding entire age groups from this form of travel, on the other hand, does not help achieve climate targets.
2. **The shift towards alternative propulsion systems does not depend on driving licence:** The shift towards alternatively fuelled vehicles is not decisively incentivised by driving licence legislation, but by the technological will to progress of the base vehicle manufacturers and the demand on the market. The industry is committed to the EU's goals for the expansion of alternative propulsion systems, but also needs support to be able to make this transformation.
3. **Weight is not a luxury issue:** The base vehicles of motor caravans have become heavier in recent years due to safety and environmental equipment (base vehicle weight increase by 350 kg in 20 years), most of which is required by EU law. The moderate increase to 4.25 t is necessary, but not because of the impending change in propulsion systems, but for all vehicles.
4. **Motor caravans are safe and durable vehicles:** The proposed weight limit will increasingly ensure that future campers will no longer be able to enter the caravanning lifestyle by acquiring pre-owned motor caravans, thereby eliminating a low-threshold access to switch to older and thus cheaper second-hand vehicles. Caravanning should not become a luxury good, also for reasons of sustainability.
5. **Weight limit represents massive unequal treatment of different age groups (Member States with grandfather rights: France, Germany Sweden):** What is the difference in driving ability between a 42-year-old (born 1981 in Germany) and a 43-year-old (born 1980 in Germany)? There will be none, except that the 43-year-old will be allowed to drive vehicles up to a total weight of 7.5 t and younger people will be excluded from an environmentally friendly form of travel.
6. **Difference in driving requirements between 3.5 t and 4.25 t are hardly negligible:** Accident figures are extremely low and do not justify unequal treatment.

Our offer: Partnership for Sustainability

The caravanning industry offers a partnership for sustainability. There are major challenges in the drive sector. To solve them, industry and consumers need good and reliable framework conditions. A driving licence law that takes these challenges into account is indispensable: This means a moderate increase to 4.25 t for all vehicles, to give as many people as possible access to a sustainable form of travel without discrimination.

Finally: Motor caravans of 3.5 t and 4.25 t have almost identical dimensions

The main difference is a slightly amended chassis (strengthened brakes and suspension).



Today	3.5 t B-Driving Licence	4.25 t C1 Driving Licence
COM Proposal	3.5 t all vehicles	4.25 t Alternatively fuelled vehicles
ECF Proposal	"3.5 t = 4.25 t" The B driving licence up to 4.25 t must be available to all motor caravans	

European Caravan Federation (ECF)
Hamburger Allee 14
60486 Frankfurt
GERMANY

Phone: +49 69 704039-0
Fax: +49 69 704039-23
info@e-c-f.com
www.e-c-f.com