

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 made by the European Caravan Federation (ECF) and is supported by all 14 of its members. The ECF is the umbrella organisation representing the national organisations of Leisure Vehicle Manufacturers.

Summary

Motor caravan tourism has grown significantly, and this environmentally friendly recreational option should be accessible to all generations and without owners suffering constrained payload restrictions by manufacturers having to remain within the current 3,5 tons Category 'B' driving licence band. As base vehicles have become heavier the ECF has lobbied, for many years, that holders of a 'B' Classification driving licence should be given the opportunity to drive vehicles up to 4.25 tons for private use.

Proposal:

1 The weight limit of the driving licence Category B to be extended to 4.25 tons for private (non-commercial) use only.

The ECF has lobbied for many years on the need for this increase (based on the points below) and it is important to note that this was before the advent of alternative fuelled propulsion systems which can add significant weight to the base vehicle.

2 A driving licence Category B, with an increased 4.25 tons limit, must ensure that motor caravans with alternative fuelled propulsion systems in the future can be driven, for private use, by authorising that any additional weight specific to the propulsion system is, where necessary, over and above the 4.25 tons threshold.

Motor Caravan converters are very much dependent on the base vehicle manufacturer and have little or no influence over their choice of propulsion system. Potentially a base vehicle manufacturer, or indeed any motor vehicle manufacturer, could choose electricity, natural gas, biogas or hydrogen; or hydrogen and electricity - many of these could apply additional masses to the base vehicle e.g. large heavy batteries. The ECF is keen to support the low emission strategy using cleaner alternatives but the additional weight burden for alternative fuelled propulsion systems should be seen in the wider context of being key to combatting climate change and improving air quality.

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 completely inappropriate, unduly burdensome, complex and time-consuming for private use.**

Today, the Category 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 Category B driving licence.** In addition, motor caravans are also becoming more equipped. 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. 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 caravanning, industry over the touristic service providers, to the many million caravanning enthusiasts. Therefore, one of the crucial tasks of the coming years will be to create the conditions for motor caravans to be electrified in their drive systems as well. This requires adaptations, whereby the motor caravan manufacturers are highly dependent on the base vehicle manufacturers. The concepts presented so far (e.g. hydrogen, electrification), do not consider the increased vehicle masses, the payload, and the required range. **Even if the ranges increase and the weights of the battery packs decrease, almost all motor caravans will come over the 3.5 t limit, and in many cases over 4.25 t as well.**

Background:

EU Type Approval¹ qualifies motor caravans the same as passenger cars - "M₁ vehicles" which are intended for the transport of persons (no more than 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.

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).

Motor caravans with a weight up to 3.5 tons can be driven with a Category 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 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 classification B is necessary.

Justification:

- **The road safety of motor caravans is excellent³.** 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 2020, of a total of 359,916 motor vehicles involved in accidents with personal injury, 801 motor caravans were involved. The share of 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%.

The strong growth in the number of motor caravans on the road over the last few years has not led to a significant increase in the number of injuries and deaths. Despite the sharp increase in the number of motor caravans, with the number of registered vehicles doubling in the past 10 years, accidents involving injuries and fatalities remained at a comparable, very low level.

- **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.

³ BAST Heft M 236 – Unfallbeteiligung von Reisemobilen 2000-2010

- **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.
- **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 regarding 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/EU⁴, 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.

The actual battery versions of the motor caravan base vehicles (e.g. Fiat Ducato) will add 700 kg to the vehicle, mainly due to the battery sets. The additional payload must not be completely used up by the new weight of the batteries.

- **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^{5,6} (Germany) and Osfoldforskning⁷ (Norway).
- **Caravanning tourism brings an economic benefit of 23bn euros in turnover⁸.** 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.

⁴ 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.

⁵ Schmied, Martin; Dr. Buchert, Matthias: Treibhausgas-Bilanzen für Reisen mit Motorcaravans. Abschlussbericht des Öko-Institutes für den Caravan Industrie Verband e.V. Berlin: 2006.

⁶ Bleher, Daniel: Vergleichende Klimabilanz von Motorcaravanreisen-heute & morgen. Abschlussbericht des Öko-Institutes für den Caravan Industrie Verband e.V. Darmstadt: 2013.

⁷ 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.

⁸ Dr. Harrer, Bernhard, Spohrer, Moritz: Economic factor of tourism camping in selected European countries, dwif e. V., 2020.

- **15% of all motor caravans are above 3.5 tons.** 2.4 million motor caravans were on the road in Europe in 2020. From 1995 to 2021, the annual registration rose from 30,000 to 181,000 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.

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