

# MEMO

**To:** European Commission, DG MOVE,  
**By:** Norwegian Motorhome and Caravan Club, NBCC  
Norwegian Motor home organization, NB  
Norwegian Caravan Branch-association, NCB  
**Date:** April 18<sup>th</sup>, 2023  
**Issue:** Revision of EU Directive of Driving License kat. B

## Background

With reference to our former initiative, May 12<sup>th</sup>, 2021, and to our exchange of information with Claire Depre, Head of Unit C2, Road Safety, Directorate General for Mobility and Transport, European Commission, June 1<sup>st</sup> 2021, September 30<sup>th</sup> and to the proposal for the DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, of March 1<sup>st</sup> 2023, we would like to make a few comments regarding Motor Homes, category M1/SA.

## Our main inputs are adopted

We are pleased to observe that our inputs for adjustment of the weight limits for driving License Category B, now are covered in Article 9, line (h) by the words:

*“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/EC13 with a maximum authorized mass above 3 500 kg but not exceeding 4 250 kg **without a trailer.**”*

As following the **DIRECTIVE 2006/126/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, of 20 December 2006**, the MAM of 4250 kg. was accepted, distributed with 3500 kg. on the main vehicle, and 750 kg. on an unbraked trailer. Concentrating the MAM on the main vehicle alone, without a trailer, as the new draft initiates, serves both traffic safety in itself, and also offer a more coherent vehicle, as motor homes and campervans usually have their payload weight limits almost covered by the installed camping equipment.

What makes us a little bewildered, is the terms following from the phrase **“driving the alternative fueled vehicles referred to in Article 2 of Council Directive 96/53/EC13”** quote:

‘— *“alternative fuels” shall mean fuels or power sources which serve, at **least partly**, as a substitute for fossil oil sources in the energy supply to transport and which have the potential to contribute to its decarbonization and enhance the environmental performance of the transport sector, consisting of:*

*(a) electricity consumed in all types of electric vehicles;*

*(b) hydrogen;*

*(c) natural gas, including biomethane, in gaseous form (Compressed Natural Gas — CNG) and liquefied form (Liquefied Natural Gas — LNG);*

*(d) Liquefied Petroleum Gas (LPG);*

*(e) mechanical energy from on-board storage/on-board sources, including waste heat;*

## **Exemption for motorhomes and campervans**

We would like to emphasize that our inputs are only related to leisure vehicles as motorhomes and campervans, registered in Type Approval Category M1/SA. Today, propulsion of almost all campervans and motor relates to diesel engines of Euro6 design. When distribution network, covered by lines (b) to (e) above, will be available, they may easily be converted to use those alternative fuels. Electrification with technology of today, means installation of heavy batteries, reduced payload and vastly shortened endurance. Even now, diesel fuel is partly produced from and with biomass origin.

We noticed that Germany, France, Bulgaria and Finland support the extension of the B license to 4250 kg. across all vehicle types, and the Netherlands supports the extension to 4250 kg. specifically for motor caravans and for electric vehicles. Which means that the countries where motorhomes and campervans are largely used, are in favor of concentrating the MAM on the main vehicle alone, already today.

## **Safety is important for all types of vehicles.**

Some stakeholder, including Member States, have argued that increasing the B license by 750 kg to 4250 kg. will increase the risk of accidents and that negative effects on road safety could follow.

This may indicate a misunderstanding. The total weight allowed is already today 4250 kg. for B license, but distributed with 3500 kg. on the main vehicle, and 750 kg. on an unbraked trailer. Which arguably is less safe than concentrating MAM on the main vehicle alone.

With the demand for two years driving experience for managing 4250 kg. it may be argued that the traffic safety may be greatly enhanced with the new order, as it provides the driver with more competency in mastering the vehicle itself.

For motorhomes, with all equipment and body installed, it is a constant balance on the edge in order to remain within 3500 kg. for the vehicle to be inside the frames of the Category B standard driving licenses. The weight is diminished, design, construction, material and other solutions calibrated to just fulfil minimum strength requests. Still, the need for payload may exceed the total weight allowed for the specific vehicle. In itself the vehicle barely can cope with the demands laid down in EC Type Approval Regulations, which means far less robustness towards traffic accidents.

The safety will undoubtedly increase with stronger materials, more robust design, and the option of having an acceptable payload without surpassing weight limits, or using an unbraked trailer of 750 kg. A trailer may also be incorrectly loaded, which may cause potential accidents and injuries in itself. There will also be far fewer motorhomes of 3500 kg. with an unbraked trailer of 750 kg. attached.

There can then be no doubt that it must then be much safer in terms of traffic and driving to put the total MAM of the trailer and the main vehicle onto the main vehicle alone. By increasing the MAM from 3500 to 4250 kg. considerably fewer motorhomes will be in traffic with illegal overweight.

More motorhomes can be built on a stronger chassis that provides greater traffic safety due to more strongly designed with active and passive safety. This is also better from a manufacturer / dealer / group's point of view, that you do not have to make a choice based on weight and not safety.

From a traffic safety point of view, it would be far better to have the 4250 kg on the main vehicle alone without an unbraked trailer attached to the vehicle.

As the weight limit of 4250 kg. already is allowed for a distributed MAM, we do not see any obstacles to make this MAM a limit also for a vehicle alone without a trailer.

From Norway, though not a member of EU, we will strongly argue to allow driving license category B for motorhomes and campervans *“with a maximum authorized mass above 3 500 kg but not exceeding 4 250 kg **without a trailer.**”*

***We will also ask for exemption from the demand for alternative fuel, as mentioned in the clause in the second line of Article 9, line (h). valid for motorhomes and campervans.***