Improving Moped and Motorcycle Training, Testing and Licensing

A joint submission from the Motorcycle Industry Association (MCIA), the National Motorcyclists Council (NMC) and the National Motorcycle Dealers Association (NMDA)

May 2026

About the MCIA

MCIA is the trade association for 'L-Category' vehicles, which includes powered two, three, and light four-wheeled vehicles (i.e., mopeds, motorcycles, tricycles, and quadricycles). Members include manufacturers of whole vehicles, accessory and components, and those providing associated services to the industry.

MCIA actively promotes motorcycle safety, aiming to enhance awareness and education among users and the general public. Through campaigns, initiatives, and partnerships, MCIA strives to reduce accidents, improve rider skills, and advocate for the implementation of effective safety measures.

About the NMC

Originally founded in the early 1990s and relaunched in 2021, the NMC is the umbrella organisation for the UK's motorcyclists' representative national organisations. Members represent a wide spectrum of motorcycle use from road riding, green road riding, heritage motorcycling, motorcycle sport, motorcycle safety, motorcycle training and the service sector.

The collective membership of these organisations and its numerous affiliates is around 200,000 individual motorcyclists. The NMC also has strong partnerships with industry, the trade, transport safety bodies and is also active internationally.

About the NMDA

The National Motorcycle Dealers Association (NMDA) represents franchised motorcycle retailers across the United Kingdom. It advocates for dealer interests, promotes industry standards, and provides guidance on regulatory, commercial, and operational matters. The NMDA also supports members through market insights, training, and networking opportunities. By engaging with government and stakeholders, it helps shape policies affecting the sector, ensuring a sustainable and competitive environment for motorcycle dealerships and the wider two-wheeled industry.

Together, MCIA, NMC and NMDA represent the interests of the £7.2billion motorcycle and other L-Category sector vehicles, comprising the industry supply side, the motorcycle trade and representatives for the UK's 1.4million active motorcyclists. In compiling this response, we have consulted extensively among our respective memberships as well as liaising widely with other stakeholders.

We have no objection to our response being published, reproduced or attributed, provided it is fully credited. Nothing in this response is considered confidential.

Executive Summary

1. This response is submitted jointly by the Motorcycle Industry Association (MCIA), National Motorcyclists Council, and National Motorcycle Dealers Association (NMDA), bringing together the perspectives of manufacturers, riders, retailers and rider training and safety organisations across the UK powered two-wheeler (PTW) sector. Collectively, these organisations represent the full scope of the market, from design and distribution through to both everyday and specialised use. We are therefore best placed to comment on how licensing policy operates in practice and the impact it has on both safety and the sector as a whole. We strongly welcome the decision by the Driver and Vehicle Standards Agency to consult in this area.

2. Given how the safety record for motorcycles has evolved since 2013, it is clear that reform is needed, so that the reversal in safety outcomes seen over the last decade can be addressed and progress can once again be made as part of the development of a full L-Category Safe System, something which is currently not in place. This is essential given the role of PTWs and wider powered light vehicles in transport and society, plus the overall contribution that the L-Category sector can make to the Government's broader priorities.

3. The core purpose of moped and motorcycle testing and training for novice riders is to improve safety. Successive licensing regimes from the 1980 to 2000s did exactly that, but since 2013 progress has slowed on safety and, in the case of motorcycle deaths, these have started to rise again.

4. The current licensing system is no longer fit for purpose. It is overly complex, expensive, administratively burdensome, and poorly aligned with modern mobility patterns, while also failing to effectively encourage and reward progression to full licence status or enable Lifelong Learning. Reform is therefore necessary, which makes this consultation very welcome.

5. However, the consultation as it stands lacks scope and ambition if it is to mark a step-change in engaging novice riders with the licensing system and in turn create better riders, fewer incident casualties and encourage further rider development. Incremental or piecemeal changes will not be sufficient if this results in an overall regime which is largely unchanged, so not addressing the core issues outlined above.

6. A comprehensive and fundamental review is required – one that delivers not only improved road safety outcomes but also supports wider government policy objectives. These include improving safety through wider novice rider engagement with the regime, while also recognising our sector's contribution to decarbonisation, congestion reduction, more efficient use of limited urban road space, and addressing the challenge of accessible, affordable rural transport all resulting in wider economic benefits.

7. While the consultation represents a positive step, many of the measures under consideration reflect issues that both the motorcycle sector and successive governments have already identified. There has already been commitment to change (2018 CBT announcements) but this has not yet happened. As such, the process risks focusing on the delivery of long-overdue reforms, rather than taking the opportunity to correct the failures of the current regime and future-proof it against evolving mobility and social trends.

8. It is unfortunate that the government has 'pushed back' the review of licensing for other L-Category types, given the context of increasing levels of micromobility adoption and innovation in lightweight urban transport solutions. This has led to the widespread non-compliant and illegal use of certain types of products, particularly among younger age groups.

9. We feel that a forward-looking approach should be taken, through the review developing to consider the full spectrum of L-Category vehicles and their role within an evolving transport landscape, plus the engagement of younger age groups in legal and regulated riding. This response includes a series of proposals from the industry on this point.

10. Licensing policy must be approached holistically. Clearly, safety is the shared priority and the purpose of the licensing regime in the first place. However, licensing shapes not only rider safety, but also access to improved mobility, employment, congestion reduction, transport decarbonisation, affordability, and social inclusion. A regime that is unnecessarily restrictive risks suppressing uptake of regulated vehicles and displacing users into illegal or unregulated alternatives, thereby undermining both safety outcomes and effective enforcement.

11. This dynamic is already visible. The growth of illegal e-bikes and other unregulated vehicles presents clear and increasing safety risks, while also distorting the entry-level market for compliant mopeds and motorcycles. At the same time, the ongoing delays in technical and user regulation for private use e-step scooters highlights a widening inconsistency in the regulatory framework. Without a more coherent and forward-looking approach, there is a real risk that compliant sectors are penalised, while unsafe or illegal alternatives proliferate.

12. The motorcycle sector already contributes significantly to national policy objectives. PTWs are space-efficient, energy-efficient and affordable, offering practical mobility across urban, suburban and rural areas. Even modest modal shift from cars to powered two-wheelers can reduce congestion and emissions while improving overall network performance. Licensing reform should therefore enable safe uptake and participation, rather than inadvertently constraining it through outdated assumptions or disproportionate barriers.

13. The present framework has also failed to deliver progression. Approximately 200,000 CBT certificates are issued annually, yet only a small proportion of riders progress to AM or A1 licences. This has resulted in a substantial cohort of "permanent learners" operating at entry level for extended periods. This is not simply a training issue, but a structural failure of the licensing pathway itself. Reform must directly address this.

    In this context, Government should prioritise the following actions:
    - Create a clear, structured and incentivised progression pathway from CBT through to full licence categories.
    - Reject the introduction of mandatory waiting periods for CBT retakes, which would further entrench illegal riding, reduce access to legal mobility, and risk undermining mobility programmes.
    - Implement a unified, cross-modal theory test to reflect modern, multi-modal transport use, combined with increased awareness of the Highway Code.

- Return to a single event motorcycle full licence test.
- Introduce ATB assessment for progression between certain licensing stages.
- Further develop ATB quality standards, move towards earned recognition and digitise the licensing regime.
- Incentivise post-test training as part of the Lifelong Learning commitment in the Road Safety Strategy.
- Review licensing requirements for electric L-Category vehicles to ensure they are proportionate and aligned with their performance characteristics.
- Develop a coherent regulatory pathway for emerging micromobility, including currently excluded categories such as L6 and L7 vehicles.

14. The existing legislative framework already provides Government with the powers required to deliver meaningful reform through secondary legislation.

Summary of Responses to The Consultation Questions

15. The section below contains summary answers to the consultation, cross-referenced to the full consultation response via paragraph number references.

	Question	**Response & Paragraph Reference**
1	Do you agree or disagree that riders who complete CBT on an automatic machine should be restricted to ride automatic-only machines?	Yes. See paragraph 27.
1a	If you agree, how should a learner rider, whose CBT entitlement is restricted to riding automatic motorcycles only, be able to upgrade that entitlement to allow them to ride manual motorcycles?	A shorter upgrade course. See paragraphs 28-29.
2	Do you agree or disagree that DVSA should introduce the motorcycle theory (including hazard perception) test or training to the CBT process? Select one answer only.	Agree. Reform must also be designed to ensure accessibility and inclusivity. See paragraphs 30-35.
2a	If you agree, how should the motorcycle theory and hazard perception test or training form part of the CBT process?	Other option. See paragraphs 30-35.
3	Do you agree or disagree that DVSA should introduce a progressive access training course to upgrade a rider's licence without the need to complete a further test carried out by a DVSA examiner?	Agree. See paragraphs 41-50.
3a	If you agree, do you agree or disagree that only a qualified DAS instructor should provide progressive access training?	Agree. See paragraphs 64-66.

4	Do you agree or disagree with the introduction of mandatory syllabuses for these other types of approved training should they be introduced? That would include:	
	A CBT automatic to manual upgrade course	Agree. See paragraphs 28-29.
	A progressive access training course	Agree. See paragraphs 41-50.
4a	Do you agree or disagree with the proposed minor revisions that we are suggesting to the CBT syllabus?	Agree. See paragraph 36.
4b	Do you agree or disagree with taking the approved training course (CBT) syllabus out of legislation?	Agree. See paragraph 36.
5	Do you agree or disagree that there should be changes made to the way in which motorcycle instructors qualify?	Agree. See paragraphs 64-66.
5a	If you agree, which of these options do you support?	Some other type of assessment. See paragraphs 64-66.
5b	Do you agree or disagree that existing motorcycle instructors who hold the authorisation to down-train other motorcycle instructors should retain this authorisation once the new qualification assessment is introduced?	Agree, however, the authorisation should be renewed at each point of certificate renewal to ensure consistent ongoing standards.
6	Do you agree or disagree that the validity period of the CBT certificate should be changed from the current two year period?	Disagree. The core issue is not the duration of CBT, but the absence of a clear and structured progression pathway within the system. See paragraphs 38-40.
6b	Should we require a minimum time period after a CBT certificate expires before allowing someone to take another CBT course?	Strongly disagree. See paragraphs 38-40.
7	Do you agree or disagree with implementing a digital platform for CBT?	Agree. See paragraph 7.
7a	What could be the potential benefits of a digital CBT platform?	Agree with all the suggestions in the consultation. See paragraph 37.
7b	What could be the potential drawbacks of a digital CBT platform?	None that we can identify. See paragraph 37.
8	How would you be impacted by any of the options in this consultation?	Our sector would be significantly impacted if the review does not result in much needed fundamental changes to testing, training and licensing, so that the negative

		outcomes of the 2008-2013 changes can be addressed and standards improved. While there is much to support in this consultation, including proposals that would materially improve progression through training, the scope of the review remains too narrow to deliver the scale of reform now required. With regard to the scope, we seek a broadening of the review to encompass the following areas: • **More creative CBT reform**, including CBT Plus - Paragraphs 43-45 • **Single Event Testing** - Paragraphs 51-63 • **Electric L-Category Minimum Test Vehicles** - Paragraphs 67-71 • **Addressing Illegal and Non-Regulated Riding Among Younger Age Groups** - Paragraphs 72-80 • **Gig Economy Riders** - Paragraphs 81-86 • **A Review of Tricycle and Quadricycle Licensing** – Paragraphs 87-90 There is also a need to avoid restrictive reform - Paragraphs 100-104. It should also be noted that all changes to the current regime can be implemented via Secondary Legislation - paragraphs 91-99.
9	Are you responding as:	A major full sector stakeholder group.

Introduction

16. Licensing is a central lever in determining how, and whether, individuals can access PTWs. Its design influences not only rider competence and safety, but also the affordability, attractiveness, and practicality of PTWs as a transport option. As such, decisions taken through this process will have implications that extend beyond training and testing, affecting mode choice, labour mobility, and the overall efficiency of the transport network.

17. In this context, it is important that reform is not framed exclusively in terms of risk reduction. We agree that safety is the primary driver of reform, that reform is necessary to address the plateaued fatality levels since 2013, and that we should support measures improving rider competence and skills. However, a system designed without equal regard to accessibility and usability risks producing unintended consequences, most notably by

discouraging lawful participation and diverting users towards unregulated or illegal alternatives.

18. This risk is no longer theoretical. The increasing proliferation of non-compliant e-bikes and other unregulated vehicles, particularly among younger age groups, demonstrates how gaps in the formal system can be exploited, with clear implications for both safety and enforcement. At the same time, innovation in light vehicle design and the emergence of new mobility models are outpacing the current regulatory framework. A modern licensing regime should anticipate these trends, rather than respond to them retrospectively.

19. The existing framework also presents practical challenges. Its structure is difficult to navigate, costly to complete, and dependent on a testing system that is under sustained capacity pressure. These factors combine to limit progression and constrain participation, particularly among new entrants. As a result, the system is not operating as an effective pathway through which riders can develop and advance.

20. Against this backdrop, reform presents an opportunity to create a licensing system that is more straightforward to understand and access, more coherent, can improve safety outcomes, and better aligned with contemporary transport needs. This submission sets out how that can be achieved, supporting higher standards of safety while also enabling greater access to regulated mobility, encouraging progression, and ensuring the framework remains relevant as the transport landscape continues to evolve.

The Safety Case for Meaningful Reform

21. At the root of vehicle user licensing is safety. It is the very basis on which countries have a licensing system in the first place. The Government has made it clear that the core outcome sought from the Review is improvements in safety.

22. The safety record since the European Third Driving Licence Directive (3DLD) was implemented in 2013 cannot be considered a success. By contrast, the previous 2DLD produced substantial reductions in rider fatalities. Fatalities have not improved since 2013; progress on severity measures have slowed and even increased in seven of the subsequent eleven years.

23. The following table illustrates PTW safety under 2DLD compared to 3DLD:

	2DLD[1]			3DLD[2]			2DLD v 3DLD
	1997	2012	% Change	2013	2024	% Change	
Deaths	509	328	-35.56	331	340	2.72	3DLD negative
KSI	6,446	6,996	8.59	6,822	5,808	-14.86	3DLD positive
Slight	18,046	12,314	-31.76	11,930	10,152	-14.90	Progress slowed
All	24,492	19,310	-21.16	18,752	15,960	-14.89	Progress slowed

24. Many factors impact on PTW safety beyond testing, training and licensing, and not all developments since 2013 have been negative. However, the rate at which fatalities were falling prior to 3DLD compared to where it is now should be considered in the context of

[1] Data from 1997 and 2012 sourced from RAS0102: Reported road casualties and casualty rates, DfT
[2] Data from 2013 and 2024 sourced from Reported road casualties Great Britain: motorcyclist factsheet 2024

the licensing framework introduced at that time, and whether it has delivered the expected improvements in safety outcomes.

25. This evidence reinforces the need for reform, but it also demonstrates that safety outcomes cannot be improved through restriction alone; system design, accessibility, and progression are equally critical.

Compulsory Basic Training (CBT)

26. CBT is not simply a training intervention; it is the primary gateway to legal PTW mobility outside the car licensing system. It therefore plays a critical role in shaping both access to mobility and the quality of rider competence entering the road network.

27. MCIA, NMC and NMDA support the principle that riders who complete CBT on an automatic machine should be restricted to using an automatic machine. This is a proportionate and logical approach, reflecting the fact that an automatic only CBT does not demonstrate competence in manual transmission control. Conversely, a rider trained on a manual machine will have demonstrated a broader skillset and should therefore be permitted to ride both manual and automatic machines. This distinction is clear, proportionate and grounded in demonstrable competence.

28. However, requiring a full repeat of CBT where an automatic trained rider wishes to upgrade to a manual motorcycle is disproportionate. It introduces unnecessary cost, duplication and administrative burden without delivering commensurate safety benefits. A more proportionate approach would be the introduction of a short, targeted upgrade module focused specifically on manual transmission competence. This type of course already exists at many Approved Training Bodies (ATBs) and consists of the current Element C[3] on a manual bike and one hour on the road; this can be the basis of the short course. This approach would preserve the integrity of CBT while recognising that the gap to be addressed is narrow and technical rather than foundational.

29. Government will also need to provide clear policy direction on the treatment of vehicles capable of both automatic and manual operation. As vehicle technology evolves, ambiguity in this area risks inconsistent interpretation across ATBs and uncertainty for riders. A clear, nationally consistent framework will be essential to ensure CBT entitlement is applied uniformly and remains future-proof. This should not be seen as an obstacle to the proposal but as something that must be considered holistically so it is fit for both the present and the future.

30. We support the introduction of theory and hazard perception testing prior to CBT but consider that the proposal should be developed further. Rather than operating as a standalone requirement within the motorcycle licensing pathway, there is a strong case for a unified, cross-modal theory and hazard perception test covering motorcycles, mopeds, cars and vans. This would support a more consistent understanding of risk across all road users and reflect the reality of a shared road environment.

[3] https://www.gov.uk/guidance/compulsory-basic-training-cbt-syllabus-and-guidance-notes/element-c-practical-on-site-riding

31. As demonstrated in the table below[4], analysis of contributory factor data supports this approach. In recorded incidents, the primary contributory factor is more frequently attributed to the other vehicle driver than to the rider, underlining the importance of mutual awareness and shared hazard perception across all modes. This reinforces the case for a broader, cross-modal understanding of risk rather than a mode-specific approach.

Factor	Frequency	Percent
Human – rider	344	37.4
Human – other vehicle	465	50.5
Vehicle	3	0.3
Environmental	71	7.7
Other failure	38	4.1
Total	**921**	**100**

32. There are also clear efficiency benefits. If an individual later transitions between vehicle categories, for example from car to motorcycle, or vice versa, there is limited justification for repeating core theory and hazard perception testing. A unified system would reduce duplication, lower costs, and establish a common baseline of road knowledge. In principle, such learning should be delivered at the earliest appropriate stage, including consideration of pre-licence education routes, to ensure all road users enter the system with a consistent understanding of risk and responsibility.

33. Reform must also be designed to ensure accessibility and inclusivity. CBT currently provides an important entry route to independent mobility for a range of users, including individuals with Special Educational Needs and Disabilities (SEND) and those for whom English is not a first language. It is therefore essential that any new testing or theory requirements are designed and implemented in a way that does not unintentionally reduce access to regulated mobility.

34. There is currently no published UK evidence demonstrating that SEND learners perform less well in theory testing, and in any case the relevant data is not comprehensively collected. However, delivery design remains critical. We are not suggesting that exemptions should be carved out, but rather that Government should engage with SEND specialists and training providers to ensure that any revised framework remains accessible and does not inadvertently create new barriers to participation.

35. The introduction of theory and hazard perception testing prior to CBT should be accompanied by a government-led campaign to improve awareness of the Highway Code. This will lead to improved road craft from all road users, not only those about to undertake PTW training and testing.

36. The proposed minor revisions to the CBT syllabus are supported, as is the principle of removing the syllabus from secondary legislation to enable more responsive updates.

[4] Laurie Brown, Andrew Morris, Pete Thomas, Karthikeyan Ekambaram, Dimitris Margaritis, Ragnhild Davidse, Davide Shingo Usami, Massimo Robibaro, Luca Persia, Ilona Buttler, Apostolos Ziakopoulos, Athanasios Theofilatos, George Yannis, Alain Martin, Fallou Wadji,
Investigation of accidents involving powered two wheelers and bicycles – A European in-depth study,
Journal of Safety Research,
https://www.sciencedirect.com/science/article/pii/S0022437520301651

However, this flexibility must be underpinned by robust governance arrangements to ensure changes remain evidence-based, proportionate, and subject to appropriate stakeholder engagement.

37. The absence of a digital CBT administration system represents a significant inefficiency in the current framework. A centralised digital platform would improve data quality, reduce fraud risk, and enhance compliance monitoring. A model analogous to the MOT system would provide a logical and proven foundation for implementation, where a redesign of the 'front end' will avoid the need for a costly procurement for a bespoke new system.

38. The introduction of a mandatory waiting period before CBT retake is not supported. Such a measure would be disproportionate and is likely to have unintended consequences. Access to legal mobility is a practical necessity for many users, particularly younger and lower-income riders. Restricting access is unlikely to improve safety outcomes and may instead increase non-compliant riding, including the use of illegal or unregulated vehicles. This would undermine both enforcement and road safety objectives. A more effective approach would focus on progression, education, and structured upskilling within the licensing framework.

39. It could also compromise providers such as *Wheels 2 Work*, who operate subsidised PTW transport for those in rural areas where public transport, walking, and cycling are not viable options.

40. Banning people for failing to pass their motorcycle test within a set time frame was tried previously in the 1990s, with a ban of a year if the motorcycle test was not passed within two years. This was rightly repealed in 2001 on the basis that the safety case was absent and it was discriminatory to novice riders. It would be a regressive move for this proposal to move forward.

Progressive Training

41. The current licensing framework has resulted in a significant cohort of "permanent learners" who do not progress into higher licence categories. This reflects a structural weakness in the design of progression pathways, where incentives to advance are limited and progression is not sufficiently embedded within the system.

42. This is evidenced by the scale of CBT uptake compared with limited progression into AM and A1 categories. Approximately 200,000 CBT certificates are issued annually, yet relatively few riders advance through the licensing hierarchy. In parallel, a greater proportion of riders progress via direct access routes to higher licence categories, with over 5,000 obtaining A2 licences compared to around 35,000 taking direct access to A licences in 2023. This indicates that the current system does not consistently encourage staged development of rider competence.

43. MCIA, NMC and NMDA therefore support the principle of strengthening progression through structured training-based pathways. Rather than repeated cycles of entry-level certification, the system should enable staged competence development through time-limited training milestones. Under such an approach, CBT would remain the entry requirement but would be valid for a defined period, after which riders would progress

through an enhanced intermediate training stage prior to final competence assessment for full licensing.

44. This model embeds progression and reward within the licensing architecture itself. It recognises that rider competence develops over time and through experience and ensures that each stage adds measurable skill rather than repeating baseline instruction. Importantly, it does not require riders to move to higher-powered vehicles if they do not wish to do so; rather, it ensures that those who plan to continue riding at lower licence levels do so with progressively higher levels of competence.

45. An enhanced intermediate stage, such as a "CBT Plus" model, should therefore be substantively distinct from CBT. It should build on foundational skills and introduce more advanced roadcraft, hazard awareness, and decision-making, with the explicit objective of preparing riders for full licence competence. This would represent a structured upskilling pathway rather than repetition of entry-level training, and would align the licensing system more closely with modern principles of competency-based progression.

46. There is also a clear system efficiency argument for reform. The current testing model places significant pressure on DVSA capacity, particularly during peak demand periods. Limited availability of test centres contributes to long waiting times, increased travel distances, and higher costs for both riders and ATBs. These constraints act as a barrier to progression and can discourage lawful access to the licensing system, in turn increasing the attractiveness of alternatives such as non-compliant e-bikes.

47. A reformed progressive access model should utilise ATBs in delivering structured progression and assessing competence for upgrades, supported by appropriate DVSA oversight and standardisation through the introduction of Earned Recognition, bringing ATBs into closer alignment with other road user training sectors. ATBs already play a central role in delivering CBT and assessing readiness for unaccompanied riding; extending their role in a controlled and accredited manner would be a logical evolution of the system.

48. International approaches demonstrate that more flexible, training-led progression models can operate effectively while maintaining safety outcomes.
    - In Ireland, progression routes allow riders with prior experience to upgrade licences through structured training modules rather than repeated full testing. [5]
    - In France, the "Passerelle" system enables A2 licence holders to upgrade after a defined period through a mandatory training course rather than a formal test, focusing on skill development rather than examination repetition. [6]
    - In New Zealand, Competency-Based Training and Assessment (CBTA) allows riders to progress based on demonstrated competence, supported by structured instruction and feedback rather than repeated testing events. [7]

49. These systems demonstrate that licensing frameworks can successfully prioritise structured competence development and progression while reducing unnecessary

[5] Road Safety Authority (RSA), 2024
[6] Ministry of the Interior, 2024
[7] New Zealand Transport Agency, 2024

duplication in testing. They provide relevant models for consideration in the development of a more efficient and outcome-focused UK system.

50. Finally, progressive access should be understood as part of a wider lifelong learning approach to rider safety, in line with the aims of the Government's Road Safety Strategy. Licensing should not be viewed as a single endpoint, but as part of a continuum of skill development. The Government should therefore consider how post-test training and ongoing rider development can be better integrated into the wider framework, in partnership with the sector, to ensure that competence and safety continue to improve throughout a rider's riding life.

Single Event Testing

51. The current two-part Module 1 and Module 2 testing structure should be replaced with a single event test, as was originally planned when the Third European Driving Licence Directive (3DLD) was implemented. The current structure of moped and motorcycle testing reflects an interpretation of Directive 2006/126/EC, which requires the assessment of rider skills and behaviour, but does not prescribe the format through which this must be delivered.

52. The current situation came about due to the UK interpretation of a manoeuvre to avoid an obstacle literally translated 50kph to 31.06mph, instead of adopting a national approach to the Directive, to convert this to 30mph to allow a flexible approach regarding location and choice of obstacle. This, plus other areas where the UK chose to adopt a 'maximalist' interpretation of the Directive, led to the creation of the Multi-Purpose Test Centres (MPTC). Issues which arose regarding the slow roll out of MPTCs led to the test being split.

53. Currently, there are under 60 MPTCs. Prior to the implementation of 3DLD, approximately 400 test centres could deliver a single event motorcycle test leading to a full licence if passed. The lack of provision and capacity for motorcycle testing has been a major issue since these changes were introduced and is a factor behind the increase in informal and illegal riding.

54. Meanwhile elsewhere in the EU, due to the Directive having 'minimum harmonisation' requirements, Member States interpreted the Directive in a manner that suited their national situation.

55. Member States used this flexibility to introduce a variety of formats to deliver the motorcycle test. In relation to the machine control requirements, this included the use of closed sections of public road or varying types of off-road environments which are not necessarily specifically defined. There also seems to be a variety of interpretations of the 'off road' element to fulfil basic requirements under the Directive.

56. The separation of off-road and on-road elements creates inefficiencies in delivery and increases logistical and cost pressures, particularly in relation to off-road site availability. A streamlined, single-event assessment model, incorporating essential off-road competence where required through building existing Mod 1 elements into ATB assessment, should be considered as a means of improving capacity, reducing

administrative burden, and enhancing accessibility without compromising safety standards.

57. Across Europe, the Directive has been implemented in different ways. In most EU Member States, motorcycle testing is delivered as a single, combined process, in which manoeuvres and on-road riding are assessed within the same event or session. Only a small number of jurisdictions require two entirely separate testing events.

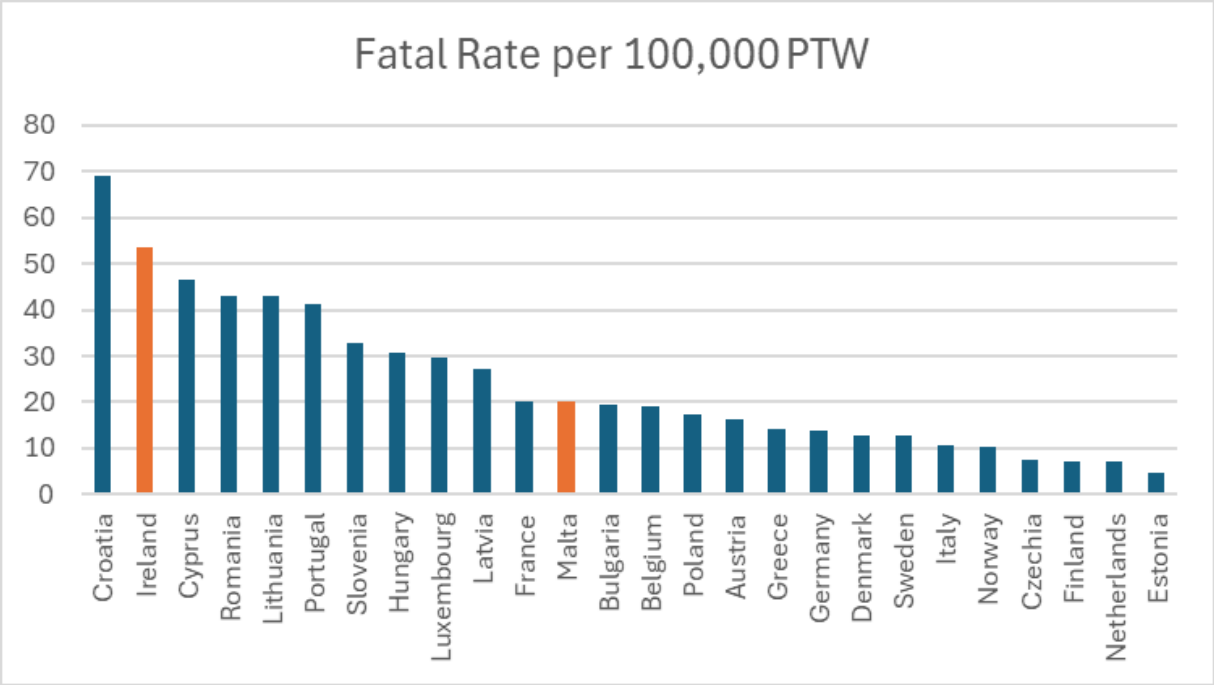
Model	Description	Countries
Two separate testing events	Off road and on-road test undertaken separately	Ireland, Malta,
Hybrid/flexible	Separate modules possible, but can be taken together	The Netherlands
Single combined test	Off-road and on-road elements delivered in one process or session	Majority of EU Member States

58. The chart below reveals the EU context in terms of average annual fatality rates between 2014 and 2019 per 100,000 registered motorcycles. When those countries which operate exclusively a two-test regime are highlighted in orange, the data reveals that these appear in the lower end of the safety rankings, with Ireland being second from the bottom. The Netherlands offers either single or twin event options, so are not highlighted.

59. The UK does not generally measure fatalities per number of registered motorcycles, but a search of various resources suggests that this *could* be around 11 per 100,000, which would make the UK 7th in the overall ranking of countries when it comes to motorcycle fatalities for the 2014-2019 period.

60. Conclusions are not easily drawn as there are so many other factors in play with motorcycle safety, but at the very least, the EU statistics suggest that returning to a single event test would not negatively impact safety, even if the UK and Netherlands were added to the data chart – given that this would not lead to a 'safety cluster' of countries around a two test regime.

Motorcycle Fatalities 2014-2019 Average (per 100,000 Registered Motorcycles)



(Source – FEMA/NMC)

61. This variation in approach demonstrates that the UK's testing structure is not the only model compatible with the Directive. It also suggests that there is scope to consider alternative approaches that maintain robust assessment of rider competence while reducing complexity and improving accessibility.

62. The current two-part structure has practical implications for users and delivery, including increased cost, administrative complexity, and reliance on a limited number of test locations. These factors act as barriers to progression and contribute to inefficiencies within the system.

63. We strongly support replacing the existing two-part testing structure with a single-event test, which would be a more proportionate, accessible, and efficient way to assess rider competence while delivering equivalent or better safety outcomes.

Instructor Qualifications

64. We support strengthening instructor qualifications and quality assurance. As the system moves towards a more progression-led licensing model, with ATBs taking a greater role in advanced training and competence assessment, it is appropriate that those providers can demonstrate higher standards and be formally recognised for doing so. Considering options related to a structured recognition framework, comparable in principle to DVSA's Earned Recognition model, would provide a potentially proportionate mechanism for distinguishing providers that meet the requirements to deliver progression training and assessment. This could include an enhanced designation for ATBs delivering advanced or progression-focused training, supporting consistency and confidence in outcomes.

65. Any such framework must be accompanied by robust but proportionate oversight. Where ATBs are granted expanded responsibilities in training and assessment, there must be clear DVSA audit, monitoring and quality assurance mechanisms to ensure standards are maintained consistently across the system. This is essential both to safeguard road safety outcomes and to maintain public confidence in a more devolved delivery model. A more flexible system does not reduce the need for oversight; it changes its focus towards outcomes and consistency rather than prescriptive process control.

66. At the same time, it is essential that any enhanced recognition or accreditation structure remains open, proportionate and competition-friendly. It should not operate as a closed system accessible only to a limited number of providers, nor should it create unnecessary administrative, cost, or qualification barriers that restrict entry. Any ATB capable of meeting the required standards through investment, training and demonstrated competence should be able to attain recognition. The focus should remain on measurable delivery outcomes and rider safety performance, rather than on excessive credentialisation or structural gatekeeping. Care must also be taken to ensure that any framework does not inadvertently consolidate provision in a way that limits market access or reduces training capacity.

Electric L-Category Minimum Test Vehicle Requirements

67. The consultation does not directly address electric L-Category vehicles. This represents a notable gap in scope. As the transport system transitions towards zero emission technologies, it is essential that the licensing framework is aligned with that trajectory. At present, it is not. Without reform, there is a risk that licensing policy becomes a constraint on, rather than an enabler of, zero emission uptake. Minimum test vehicle specifications and licence thresholds remain more closely aligned to internal combustion characteristics than to the performance profile of electric vehicles.

68. Electric PTWs within the A1 and A2 categories can exhibit stronger acceleration and different performance characteristics compared to internal combustion equivalents at similar nominal power outputs. However, there are currently no electric motorcycles capable of meeting the minimum test vehicle requirement for the full A licence category above 50kW. This creates a structural inconsistency within the licensing regime, as riders seeking to obtain a full A licence are effectively required to do so on internal combustion vehicles, regardless of their intention to ride electric motorcycles. This misalignment risks distorting user behaviour and discouraging progression through electric pathways.

69. This issue is not technical or marginal in nature. It has direct implications for the Government's transport decarbonisation objectives. Electric PTWs and other L-Category vehicles, have the potential to play a significant role in reducing emissions, improving urban air quality, and supporting modal shift. A licensing system that does not accommodate these vehicles risks slowing adoption and undermining wider policy goals.

70. The challenge extends beyond PTWs. Emerging electric three and four-wheeled L-Category vehicles are, in many cases, not currently suitable for use within the training and testing framework. As these vehicle types become more prevalent, this exclusion will become increasingly problematic. A coherent system must ensure that all vehicle types in regular road use are supported by appropriate training and assessment pathways.

71. Government should therefore commit to a targeted review of minimum test vehicle specifications and associated licence entitlements to ensure they are technology-neutral and based on real-world vehicle capability and risk, rather than propulsion type alone. This review should be undertaken in close collaboration with industry and the broader motorcycle sector, to ensure that any revised framework is practical, proportionate, and aligned with both safety requirements and the evolving vehicle market.

Addressing Illegal and Non-Regulated Riding Among Younger Age Groups

72. Given the emergence of a range of new electric powered mobility products and the significant consumer interest in them, there is a need to introduce structured and regulated access to certain low-speed electric L-Category vehicles through the creation of new, clearly defined categories. While not explicitly addressed within the consultation, this issue is directly relevant to the wider objective of modernising the licensing framework and should be considered alongside the proposed reforms. We therefore seek a discussion on what options can be explored going forwards, while keeping the issue of safety front and centre.

73. The current regulatory position in relation to micromobility is fragmented and increasingly unsustainable. The widespread use of e-scooter and non-compliant e-bikes, often outside a clear, legal framework and often outside the current age ranges for regulated licensing, presents growing safety, enforcement, social and consumer protection challenges.

74. Evidence from the Parliamentary Advisory Council on Transport Safety indicates that e-scooter-related injuries are significantly under-reported[8], while the London Fire Brigade had identified e-scooters and e-bikes as among the fastest growing fire risks. Bringing these vehicles within a defined regulatory structure – incorporating registration, licensing, training, insurance and appropriate safety requirements – would represent a clear improvement on the current position.

75. In this context, the introduction of a new L0 category for e-scooters and similar devices, alongside an L1-CA category for low-powered electric mopeds, should be considered. An L1-CA vehicle could be defined as a registered light moped with a maximum continuous power of 1kW, peak power of 1.5kW, and a maximum speed of 21.75 mph (35 km/h). Access would be conditional on holding an appropriate licence, completing a theory test and CBT, maintaining insurance, and complying with helmet requirements. This would establish a clear, regulated entry point into powered mobility, particularly for younger users.

76. The case for such an approach is both social and strategic. Regulated access to low-speed, low-power vehicles would address several urgent and very real safety issues among the younger cohort who are currently riding illegally. It would also provide an affordable and practical mobility option for younger and lower-income users, while also supporting access to employment and education. Crucially, it would bring current younger users immediately into a regulated environment at an earlier stage, enabling the development of road safety awareness and competence under controlled conditions. The alternative is to allow widespread illegal usage patterns to become further entrenched.

[8] PACTS-The-safety-of-private-e-scooters-in-the-UK-Final-Report.pdf

77. International experience demonstrates how this is being delivered without compromising safety, provided it is appropriately structured. Several European countries permit access to moped-equivalent vehicles from age 14 or 15, supported by training, licensing and vehicle restrictions[9]. For example, Sweden and Denmark - both of which rank among the safest road systems globally - allow access to low-speed mopeds with strict performance limits and regulatory controls.

78. Six countries allow access to an AM licence from age 14, while thirteen others permit access from 15 years. In contrast, the UK's minimum age of 16 is out of step with the European norm. Sweden recorded 2 fatalities in 2024 for all moped users,[10] and Denmark recorded 9 fatalities in 2022 for all moped users.[11] In Sweden, users aged 15+ can access a "Class II" moped with a maximum speed of 25km per hour with a power that does not exceed 1kW.[12] In Denmark, users aged 15+ can access "Small Mopeds" with a maximum speed of 30km per hour.[13] Sweden and Denmark are both ranked within the top three for safest roads in the world. The UK ranked 4th out of 36 countries with available data for the lowest number of road fatalities per million population.[14] This impressive ranking, however, masks that KSIs in the UK, across all vehicle types, have largely stagnated for over a decade now.

79. The UK does not need to replicate other systems directly, but it should not assume that these systems are inherently incompatible with safety – the data suggests otherwise. On the contrary, a model based on limited speed, constrained power, mandatory training, and clear regulatory oversight offers a safer alternative to the current situation, in which under-regulated or illegal vehicles are already widely used. The key policy choice is therefore not whether earlier access should occur – it already does – but whether it is managed within a formal system or left to develop outside it.

80. Aligning access to an L1-CA category with the minimum age currently associated with legal e-bike use would support greater consistency within the regulatory framework. It would also provide a credible, compliant alternative to illegal or non-compliant vehicles, reducing enforcement ambiguity and supporting safer behavioural norms. Importantly, this approach represents an extension of regulation rather than a relaxation of standards, strengthening both safety and compliance outcomes.

Gig-Economy Riders

81. The rapid expansion of app-based delivery services has significantly increased the use of PTWs in last-mile logistics. Licensing reform must take account of this structural shift. A

[9] ACEM 2023
[10] International Transport Forum, Sweden 2024, https://www.itf-oecd.org/sites/default/files/sweden-road-safety.pdf
[11] International Transport Safety Council, 2023, https://www.itf-oecd.org/sites/default/files/denmark-road-safety.pdf
[12] Swedish Transport Agency, 2024, https://www.transportstyrelsen.se/sv/vagtrafik/fordon/fordonsregler/Moped/Moped-klass-II/
[13] Danish Road Transport Authority, 2024, Driving licence for mopeds
[14] https://www.gov.uk/government/statistics/reported-road-casualties-great-britain-annual-report-2024/reported-road-casualties-great-britain-annual-report-2024

growing proportion of riders now depend on PTWs for income, often operating at high frequency and mileage. The licensing and training framework must therefore be capable of supporting commercial use cases, while maintaining appropriate safety standards and regulatory oversight.

82. There is a clear interaction between the design of the licensing system and behaviour within the delivery economy. Where access to legal PTWs is perceived as complex, costly or restrictive, demand does not diminish; it is displaced. In this context, there is strong evidence of migration towards illegal or non-compliant vehicles, particularly modified e-bikes. This has had a material impact on the lower end of the L-Category market, undermining compliant products and distorting competition. From a policy perspective, this represents a failure of alignment between regulation, enforcement and real-world demand.

83. There is also concern about how parts of the gig economy operate. PACTS has researched this issue, particularly the incentive structures in delivery apps. Financial incentives in these apps alter rider behaviour, often to the detriment of road safety. Additional regulation on employment status and corporate responsibility should be examined. Although this falls outside the scope of this consultation, it reinforces the need for a cross-Government solution.

84. The current framework also does little to encourage progression among riders using PTWs for commercial purposes. Many delivery riders operate on repeated CBT certification, with limited incentive or structured pathway to develop beyond entry-level competence. While it is recognised that not all such riders wish to move to higher-powered vehicles, continued operation at the lowest level of certification is not consistent with the demands of high-mileage, time-pressured commercial riding.

85. Government should therefore consider how licensing policy can better reflect the realities of professional PTW use. This could include mechanisms to encourage or require progression for riders engaged in commercial activity, alongside a clearer role for platform operators in supporting compliance. For example, delivery platforms should be expected to verify licence status, insurance, and vehicle legality as a condition of engagement, helping to reinforce the integrity of the regulated system, and riders could be expected to undertake continuous professional development in the same way as Category C and D drivers do.

86. This is fundamentally about professionalising competence rather than restricting access. A system that supports progression, ensures compliance, and maintains accessibility will deliver better safety outcomes, fairer competition, and reduced reliance on illegal or unregulated vehicles. Failure to address this issue risks further erosion of the compliant PTW market and a continued shift towards unsafe and unregulated alternatives.

A Review of Tricycle and Quadricycle Licensing

87. We recommend that licensing reform should, in due course, encompass the full spectrum of L-Category vehicles, including tricycles and quadricycles within categories L2, L5, L6 and L7. While these segments currently represent a smaller share of the market, their relevance is likely to increase as vehicle technology evolves and electrified light vehicles become more prominent. The current consultation focuses on mopeds and motorcycles,

but a more comprehensive approach will ultimately be required to ensure the licensing framework remains coherent and future-ready.

88. L-Category vehicles operate as part of a connected system, and changes to licensing requirements for mopeds and motorcycles will have implications for adjacent categories. At present, entitlement structures across L-Categories are not always fully aligned with vehicle characteristics, risk profiles, or real-world usage. However, it is essential that any consideration of alignment does not result in the removal of existing, well-functioning access routes that support safe and inclusive mobility.

89. Existing entitlements, such as the ability to operate L5e tricycles on a car driving licence, play an important role in enabling access to L-Category vehicles, particularly for users transitioning from car-based transport. These pathways support adoption, accessibility and wider transport policy objectives, and should be retained.

    In principle, licensing pathways should, where appropriate, reflect the vehicles users intend to operate, particularly in the context of training relevance and user understanding. However, this should be delivered in a way that enhances clarity and safety without introducing unnecessary complexity or restricting access. A more effective approach is to ensure that training and guidance are appropriately tailored, while maintaining proportionate and accessible entitlement structures that support uptake across the full range of L-Category vehicles.

90. Government does not need to resolve all aspects of this within the current consultation. However, it must acknowledge the interdependencies across L-Category licensing and commit to a structured programme of further work to address tricycle and quadricycle categories. Without this, there is a risk that reform in one part of the system will create unintended consequences elsewhere, leaving a growing segment of the market without a clear or coherent regulatory pathway.

Basis of Regulatory Change

91. During discussion on the future of the UK moped and motorcycle licensing regime, it has been suggested that only certain elements can be amended without recourse to primary legislation. We have therefore considered the relationship between primary legislation and the relevant secondary legislative framework in detail.

92. Section 97 of the Road Traffic Act 1988 (and predecessor legislation) establishes the statutory basis for driver licensing. It provides the Secretary of State with powers to set the conditions for granting licences, require tests or training, and define vehicle categories. It does not, however, prescribe the detailed structure or operation of the licensing system, instead enabling these matters to be determined through secondary legislation.

93. Each and every subsequent regulation under the Act, relating to driver and rider licensing are set out in secondary legislation. These have been enacted through amendments to the Motor Vehicles (Driving Licences) Regulations, which have been amended over time to reflect evolving policy. These amendments have introduced significant and substantive changes to the licensing regime. For example:

- 1980 (EEC 1st European Driving Licence Directive) SI 1987/1968, SI 1988/1207, SI 1990/144
- 1983 (125cc learner law) SI 1982/1230
- 1990 (Introduction of CBT) SI 1987/1378, SI 1990/144 (Motor Cycles (Provisional Licence) (Amendment) Regulations 1990)
- 1997 (EU 2nd European Driving Licence Directive) SI/1996/1974, SI 1998/1420, SI 1999/2864
- 2008/9 (changes to testing under 2DLD) SI 2007/720, SI 2007/2152, SI 2008/1241
- 2013 (EU 3rd European Driving Licence Directive) (SI/2012/977)

94. These precedents demonstrate that fundamental reforms to motorcycle licensing have historically been delivered through secondary legislation, without the need for primary legislative change.

95. With regard to international law, driver and rider licensing is covered by the 1968 Vienna Convention on Road Traffic of which the UK is a signatory, as is the EU and most other territories.

96. For motorcycles, there are two categories noted; category A Motorcycles and category A1, Motorcycles with a cubic capacity not exceeding 125cc and a power not exceeding 11kW (Light Motorcycles) (Annex 6.8 & 6.9). A UK proposal to include A2 and A3 (A) has been put forward, so aligning international regulations with the EU, but this is still subject to discussion. The Convention does not prevent jurisdictions from creating further categories or requirements, but these may only be valid in the territory where they are applied.

97. Vienna requires the issuing of licences and that skills should be verified. It does, however, allow a lot of flexibility for training and 'verification' of skills. Indeed, it only specifies that this should take place, with very limited specific detail about how it is done.

98. This provides the UK with significant flexibility in determining how rider competence is assessed and verified, as long as it remains in compliance with the essential aspects of Vienna – with other signatory countries, including the EU, required to recognise these changes.

99. But given the need to protect the ability for individuals to exchange licences if moving abroad, we support the Review's overall safety standards ambition and we would be wary of any proposals to fundamentally move away from the structure already defined in international norms.

Avoiding Restrictive Reform

100. A central concern running through this response is the risk that this consultation becomes a vehicle for restrictive reform. That would be the wrong conclusion to draw from the sector's safety record, given how previous 'softer' regimes led to much better safety outcomes than we have at present. We do not seek to downplay the challenges around road safety; however, these should act as a catalyst for more effective Safe System design, not as a justification for limiting access or delaying meaningful reform. The objective must be to create a framework that delivers better-trained riders and enables safer participation at scale.

101. Licensing policy plays a critical role in unlocking wider social and mobility benefits previously mentioned in this submission. If it remains unnecessarily complex or restrictive, it will continue to act as a barrier to uptake and could embed illegal riding. In that sense, licensing reform is not a marginal issue, but a test of whether policy is aligned with wider objectives on integrated transport, net zero and affordable mobility.

102. The consequences of an overly complex, costly or restrictive licensing system are well understood. It suppresses participation, discourages progression, and increases the likelihood that users turn to illegal or unregulated alternatives. This weakens compliance, complicates enforcement, and ultimately undermines safety outcomes. A well-designed system should achieve the opposite: encouraging participation within the regulated framework and supporting the development of higher levels of competence over time.

103. There is also a strong case for challenging assumptions that greater restriction necessarily leads to better safety outcomes. As described above, prior to the implementation of 3DLD, motorcyclist fatalities had been declining, with a reduction of 271 fatalities between 2006 and 2012. Following its introduction in 2013, that trend did not continue in a consistent manner, and in a majority of subsequent years fatality levels exceeded those recorded in 2012. While causation cannot be attributed to licensing policy alone, this evidence demonstrates that increased complexity and restriction do not, in themselves, guarantee improved safety outcomes.

104. Government should therefore avoid equating "safer" with "more difficult to access." Experience shows that this approach does not work. The critical question is whether the licensing framework promotes the right behaviours: progression, upskilling, legal compliance, and informed interaction between road users. Reform should be assessed against these outcomes. Measures that increase barriers without improving behaviour risk being counterproductive, displacing users outside the regulated system and weakening the effectiveness of the overall framework.

Conclusion

105. This consultation represents a significant opportunity to modernise the UK's motorcycle and moped licensing framework. Reform should focus on enabling safe, legal and accessible participation. It should be used to establish a regime that is clearer, more progressive, more proportionate, and better aligned with evolving mobility patterns within a modern integrated transport system. The current system does not sufficiently support progression, places unnecessary burdens on users and regulators, and is not adequately aligned with emerging and evolving vehicle technologies or the growth of new use cases, including gig-economy-based riding.

106. Government should prioritise reforms that improve safety, enhance competence and progression, improve accessibility and affordability, support technological innovation, enable the transition to zero emission mobility, open further opportunities for social inclusion and improve system design.

107. This requires a move away from blunt or counterproductive measures such as mandatory waiting periods for CBT retakes, in favour of a coherent package of reform.

This should include the development of a structured progression pathway through CBT Plus and ATB-led assessment; full digitalisation of CBT and licensing administration; a review of licensing requirements and test vehicle specifications for electric L-Category vehicles; and a commitment to address licensing coherence across the wider L-Category spectrum not fully captured within the scope of this consultation.

108. We stand ready, as a triumvirate, to work constructively with Government to deliver a modern, proportionate and future-ready licensing framework. Government now has an opportunity to move away from a system that constrains and fragments access, towards one that improves safety, raises standards, enables greater participation in safe rider progression and unlocks the full potential of PTWs and the wider L-Category sector within the UK's transport system.

Motorcycle Industry Association (MCIA)
National Motorcyclists Council (NMC)
National Motorcycle Dealers Association (NMDA)

11th May 2026