

Statement by Oy Brandt Ab and Oy Elfving Ab regarding Finland's plan to allow speed-limited cars

- 1. The bill has been justified by the need to improve traffic safety. However, according to Finnish Transport Safety Agency (Trafí), the effects on safety are largely unclear.**

Allowing speed-limited cars for 15-year-old youngsters will substantially increase the use of motor vehicles at the age where traffic behaviour is risky. Combined with qualities of a car (high mass, speed and acceleration) and changes in traffic fluency (more passing), the reform might not lead to improved traffic safety, but exactly the opposite as the risks for other traffic, especially light traffic increase.

Passenger cars' qualities differ considerably from those of microcars, that 15-years-olds are currently allowed to drive. The acceleration of passenger cars is always three times higher, they have a bigger mass and ten times the power compared to microcars. Therefore, it is clear, that giving 15-years-olds access to drive passenger cars, although speed-limited, means allowing 15-years-olds drive a completely new type of vehicle, which remains largely similar to a normal passenger car. What is more, in speed-limited cars there could be up to 5 passengers, while microcars only have 2 seats. This increases the risk for accidents as they often are connected to several youngsters distracting a young driver.

In addition, according to the Finnish Transport Safety Agency (Trafí), the reform includes a probable risk that speed-limiters will be tampered. Turning off the speed-limiter would result in youngsters driving a full-scale car, with a maximum speed of 160km/h at least.

The Finnish Transport Agency has also stated, that it is very hard to assess the risk level of speed-limited cars. It is assessed, that as a result of the reform safety would increase mainly because moped drivers would switch to speed-limited cars.

- 2. Finland would in practice set up a new vehicle class and divert from harmonised EU vehicle categories. Hence, the Finnish market would look very different from the other EU market. This contradicts the principles of the single market.**

The bill would add speed-limited cars to the same T-category as agricultural tractors. However, speed-limited cars differ substantially from agricultural tractors, whose main function is performing agricultural/forestry work. To interpret speed-limited cars as "tractors" and allow them to be driven with AM-license is in contradiction with EU vehicle categories as well as the Driving License Directive.

To allow this kind of exception would contradict the single market development as Finland would divert from the harmonisation of vehicle categories inside the EU. It is probable, that also other countries would follow Finnish example, which would lead to the shattering of the common traffic market.

- 3. The bill would affect the Finnish market substantially and develop it to another direction than the rest of the single market.**

The Finnish Transport Agency has assessed, that the reform could lead to 41 000 speed-limited cars in the Finnish roads. The current number of microcars is 8 000, which means that even in the minimum

scenario of Finnish Transport Agency (12 000), the number of vehicles will increase considerably and particularly for young drivers, who have an increased accident risk.

In addition, the reform would encourage young people to use cars earlier in their life, which would increase the popularity of private cars also in the future. According to Finnish Transport Agency, the reform will decrease the use of public transport and two-wheelers. This development contradicts the wider energy and climate policy objective of decreasing the use of private cars.

In the metropolitan area, where mopeds and microcars are currently used very little, the climate impacts would be substantial. The increasing private car traffic will worsen traffic jams especially in large cities. The effects of the reform would most likely spread to other parts of Europe as well. In case other EU-countries make a similar reform, the negative effects will be multiplied.

The preparation of the bill has already made sales of microcars collapse in Finland (see annex 1). Microcar sales have dropped by 63,6 % compared to same months one year earlier in 2017. It is clear, that microcars will disappear entirely from the Finnish market and respectively the number of vehicles unknown in other EU countries will increase exponentially, should the bill pass. The sales drop demonstrates indisputably, that the bill considerably alters the Finnish market and the development will differ significantly from the rest of the EU.

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ANNEX 1

New registrations of microcars in Finland

NEW REGISTRATIONS
August 2018

Statistics Finland

Table 2.1 Light quadricycles L6e by brand and model 1-8/2018

Brand	Month of registration								Total	Change		Cumulative	1-8/2017	Change	
	1/2018	2/2018	3/2018	4/2018	5/2018	6/2018	7/2018	8/2018		8/2017	units			%	1-8/2018
TOTAL	63	25	23	11	16	13	10	25	62	-37	-59,7 %	186	511	-325	-63,6 %
AIXAM	23	5	7	5	6	4	4	6	28	-22	-78,6 %	60	206	-146	-70,9 %
BELLIER	1	-	3	-	-	-	1	7	2	5	250,0 %	12	23	-11	-47,8 %
CASALINI	-	-	-	-	-	-	-	-	-	0	-	0	2	-2	-100,0 %
CHATENET	6	3	2	1	1	3	1	2	8	-6	-75,0 %	19	76	-57	-75,0 %
LIGIER	33	16	11	5	9	6	3	10	24	-14	-58,3 %	93	204	-111	-54,4 %
RENAULT	-	1	-	-	-	-	1	-	-	0	-	2	0	2	-