

<p><b>International Federation of Motor-home Clubs</b> aisbl</p> <p>EU Transparency Registry Id: 281777435616-61</p> <p><a href="https://www.ficm-aisbl.eu">https://www.ficm-aisbl.eu</a> France Dept. / Reg. Nb: 62/W354002273</p> <p>Brussels Office: +32 470 70 43 70 <a href="mailto:clooster-ficm@proximus.be">clooster-ficm@proximus.be</a></p>	<p>EUROPEAN COMMISSION</p> <p>Attention of Her Excellency, Madam Adina-Ioana Válean Commissioner for TRANSPORT &amp; MOBILITY</p> <p>Rue de la Loi, 200</p> <p>1049 Brussels</p>
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Brussels, 25 May 2021,

Concern: Revision of Directive 2006/126/EU/ dated 20 December 2006 on Drive Licence 2021 Q2  
Memorandum on the issue of GVWR\* under the B licence regime

\* Gross Vehicle Weight Restriction

Her Excellency, Madam Commissioner,

I write to you on behalf of the International Federation of Motor-home Clubs of which I am the President.

I wish to draw your attention on the document in attachment which could perhaps be relevant for future decision making in the domain of B licence regulation.

The attached document is a **memorandum of real actuality** since the latest public consultation organized by your Services, just closed on May 21<sup>st</sup>.

As you are probably aware, over 2200 contributions were received, with a majority coming from citizens (over 93% of them).

Compared to the Ex-post Roadmap consultation for the Evaluation of Directive 2006/126/EU (closed in September 2019), this makes a significant difference.

Only ONE citizen had contributed in 2019 out of 23 contributors, of which 3 made recommendations to raise the Gross Vehicle Weight Restriction of the B licence from 3500 kg to 4250 kg:

- the German ADAC (ref. [F473270](#))
- the Austrian ÖAMTC (ref. and [F473292](#))
- the ECF (European Caravan and autocaravan Federation), which unite manufacturers (ref. [F473227](#))

Our Federation was admitted in the Transparent Register in August 2019, and we tried to understand the case of PVWR increase for the B licence.

We started to tackle the problem from a **technological standpoint** and we submitted our view to DG Grow by June 2020, with a contribution to their consultation on future Euro 7 norms (réf. [F521860](#)).

On the DG Move side, we took part in interviews, questionnaires, and public consultations, where we could express our views.

However, we decided not to contribute to the latest consultation that closed last Friday 21 May 2021.

We noticed a vast majority of citizens requiring the upgrade of GVWR.  
We realized very quickly that they were saying **WHY** they wanted the upgrade.

We are of the opinion at IFMC that **WHY** is more important than **WHAT**.  
Many user-driven organizations followed on the same tone, some of them being very important.

Our Federation like many other actors in the motor-home community is working very hard since many years to have the GVWR rule changed.  
Motor-home adepts don't understand in general the reason why it seems to them they are not listened to.  
The answer is that they need to express their concern first, along the right procedures and facilities offered by the Union.

Motor-homing is influencing the Drive Licence since many years already, very gradually and we all admit that progress is obvious.  
It happens exactly the same way as for the small camping trailers in the Geneva Convention of 1949: they were recognized!

On our side, we tried to find facts, the origin of users and Legislator current concerns and point to what might be a simple misunderstanding.  
Several governments helped us, because several of them challenged this EU measure rigorously, from the start.

Our memorandum takes into account the contributions made at the public consultation that closed by May 21/05/2021.

It provides a comprehensive approach to the tension between the demand of motor-home users and the legal framework.

By trying to highlight the respective constraints of each side of the game, its objective is to reconcile the points of view and help the EU Legislator to focus on the best compromise while explaining it.

However, after much discussion with the author, we decided it is too sensitive a document and too early to be made public.

I wish you a nice discovery.

In the meantime,

I remain,



Claude GUET  
IFMC / FICM President