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Brussels, 30 April 2014

## **IRU Position on compulsory professional driver training**

*Unanimously adopted by the IRU Passenger Transport Council (CTP) on 7 November 2013 in Geneva and by the IRU EU Goods Transport Liaison Committee (CLTM) on 6 March 2014 in Brussels*

### **IRU Position on the compulsory professional driver training in view of the revision of Directive 2003/59 on the initial qualification and periodic training of drivers**

#### **I. ANALYSIS**

##### **1. Background**

The EU Driver Training directive 2003/59/EC, implemented in September 2008 for category D drivers and September 2009 for category C drivers, has established the requirement for all commercial vehicle drivers of vehicles of more than 9 seats for category D and above 3.5 tons for category C whose main activity is driving to acquire – in addition to the relevant driving licence – a Certificate of Professional Competence (CPC) based on an initial qualification and/or the completion of 35 hours of periodic training every 5 years for those who already held a relevant licence prior to the directive's entry into force.

These obligations represent both significant challenges and opportunities which both regulators and the industry must come to terms with. Although implementation of the directive is a shared responsibility, a number of problems have been identified and the implementation of the directive has brought mixed results.

As a result, the European Commission (EC) has recently announced its plans to revise the directive and possibly present a new proposal in 2015.

##### **2. Implementation of directive 2003/59/EC**

The EC submitted a [report](#) on the transposition of the directive by the 27 EU Member States (MS) on 12 July 2012.

This report presents well known aspects of the implementation, such as the number of MS that have chosen a training plus test option (15 MS), the test only route (11 MS) or both (1 MS) as ways to obtain the initial driver CPC qualification. Details are also given concerning which countries allow accelerated training, the different MS deadlines for the completion of periodic training, the ways in which MS expect periodic training to be undertaken, and the means for indicating possession of a CPC whether on a driving licence (code 95) or through a driver qualification card. It is also reported that a majority of MS have made use of the exemption in Article 2 to exclude from the scope of the directive drivers of the concerned vehicles who do not undertake driving as the principal activity of their work.

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The text below summarises the experiences of implementing the directive based on the EC report and the experiences of the IRU and its Members, notably as discovered through the [STARTS](#) analysis. While the conclusions and recommendations of the EC report are somewhat limited the following are worth noting.

- The EC report notes the likelihood that the Driver Training Committee will be required to adopt guidelines on the principles behind MS use of the exemption outlined in Article 2 of the directive as described above. In fact, during the recent Committee meeting (of 26 June 2013) it was decided to create a subcommittee on exemptions, the objective of this working group being to provide recommendations on the application of the exemptions within the directive.
- The EC highlights the big differences between MS in terms of training programme design, teaching methods, class size, use of technology and requirements for becoming an instructor or an approved training centre. One point that is underlined in the EC report is the expectation that (contrary to the existing practice in some MS) subjects that are not included in the annexe to the directive – such as dangerous goods driving – should not be mixed with the CPC periodic training.
- The report states that the equivalence of qualification and training systems put in place by MS is guaranteed by the minimum requirements of Annexe 1 of the directive concerning subjects to be taught and the structure of tests, all of which the EC claims is suitably monitored and controlled by individual MS.
- If this is the case, then the lack of mutual recognition by many MS of driver training undertaken in another country must have more to do with bureaucratic unwillingness to accept training carried out abroad rather than a lack of confidence in the quality of training and testing systems carried out in other MS. Overall problems concerning the lack of mutual recognition between MS for initial qualification and periodic training as experienced by IRU Members are substantially downplayed in the EC report. However, they have been widely reported in the context of the STARTS project and also reflected in the final joint IRU and ETF Social Partner Recommendations that were adopted within the EU Road Transport Social Dialogue plenary meeting on 24 October 2012.
- The EC report also asserts that no major problems have arisen in respect of MS enforcing the deadlines for the completion of periodic training which differs from MS to MS towards foreign drivers. It says that up until 2015 for category D and 2016 for category C MS shall not enforce the deadlines for completion of periodic training. This would give the incorrect impression that periodic training deadlines will not be enforced at all until 2015 even towards domestic drivers. This is not the case. What should have been indicated more clearly is that MS in the EU Driver Training Committee have agreed not to impose their own periodic training deadlines on foreign drivers crossing their territory. The IRU would agree that to date problems arising from MS not respecting this agreement have been isolated, but further work is surely required to ensure that all such incidents are avoided.
- Although the added value perception has somewhat improved, the drivers and the industry do not always see a great added value in the training, as the training centres sometimes engage in a race to the bottom in terms of price and quality.
- Furthermore, MS deadlines will most likely worsen the driver shortage issue as older (and more experienced) drivers are likely to exit the labour market earlier and younger drivers will not enter it due to the costs and burdensome training requirements. In some MS there is a danger that large parts of the driver pool will not meet the deadlines.
- Although there has been a steady decrease in road accidents in the EU over the past decade, the contribution of the directive to road safety in the EU is impossible to quantify and so is its impact on emissions reductions. There is no direct correlation, relevant research, evidence or impact assessment available in this respect. Also

coherent statistical data is unavailable and sometimes irrelevant data is used. There is only a perception that there was an improvement in these two areas due to the directive however without direct causation. There is also some perception of a positive impact on the professionalism and the image of the profession, however this is also impossible to quantify.

## **II. IRU POSITION**

The IRU supports the principle that drivers must be professionally competent and hence agrees to the principle of professional driver training. The IRU also agrees that appropriate training provides more chances for people to qualify for a driver's job at a younger age. Special attention should be devoted to measures that will raise the attractiveness of the profession for young applicants. Training schemes and on the job training should also allow for and include practical supervised driving experience for novice drivers.

The IRU supports the directive's objectives to have a level playing field that will contribute to improving the professionalism of the industry. On the other hand, given the current economic constraints and driver shortages, driver training must not represent an obstacle in terms of excessive requirements or unrealistic prices for the drivers to enter the profession or expedite the retirement of experienced drivers. The IRU also considers that better synergies between the training for driving licences and the training for the Driver CPC must be identified and leveraged whilst focusing on the learning outcomes rather than minimum initial qualification hours.

It must be remembered that prior to the introduction of the current directive, national training schemes existed in some EU Member States and that some road transport companies have had their own training courses in place. Training schemes and methods must allow for flexibility to reflect many differing aspects of road transport operations and the specificities which are known best by the operators. Companies must have the possibility to provide training themselves on the condition that they are able to fulfil the directive training requirements and therefore in-company training should be accepted in all EU Member States.

Nevertheless, the IRU considers that harmonised minimum standards for knowledge and skills can usefully be adopted. For the IRU, the starting point is that a balance must be established in the necessary harmonisation of training requirements along EC and industry priorities and retention of the flexibility for Member States and companies that know best about the specific driver qualifications they need to develop. Arbitrary regimes that bring high financial and bureaucratic costs must be avoided.

In more specific terms, the IRU supports the establishment of a common framework for training and testing, and harmonised requirements for training centres and instructors. As has already been stated, the focus should be on supporting policies and industry requirements such as those of the EC White Paper on Transport and IRU Road Safety and 30 by 30 resolutions. The priorities will be regularly discussed and established through a cooperative approach involving all key relevant stakeholders. There is a need for the definition of a European Qualification Framework (EQF) and a driver learning outcome profile that describes the skills, knowledge and competencies drivers have to demonstrate. In terms of the training assessment, different approaches for initial and continuous training should be established to better reflect the experience of the drivers.

The Member States have to establish quality assurance systems for training institutes, their curricula, trainers and inspectors as well as step up their coordination, approval and audit of the training centres.

Overall problems concerning the lack of mutual recognition between Member States create difficulties for the business operations of road transport operators and negatively impact on the free movement of people, one of the objectives underpinning directive 59/2003/EC. The

level of mutual recognition has to be fully acknowledged and the EC must enforce the provisions towards Member States. At the same time, the Commission has to monitor bureaucratic barriers that are imposed outside of the directive's framework.

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