



The Swedish government  
EU-minister Jessika Roswall  
Bostads- och infrastrukturminister Andreas Carlson

**By email**

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Brussels, 24 janvier 2023

**Subject: IRU and EPTO proposals for the revision of the EU Driving Licence Directive**

Dear Ms Roswall, Mr Carlson,

we write to you in order to put the light on the ongoing work on the revision of the EU Driving Licence directive (2006/126/EC). The Swedish presidency should engage with the Commission to ensure the revised directive is published in Q1 2023 and that the following points are taken into consideration to address the serious concerns of the bus and coach sector.

In 2021 there were about 20,000 unfilled bus and coach driver positions across the EU and the situation is continuing get worse with driver vacancies increasing by 43% in the first 9 months of 2022.

The bus and coach are the backbone of the public transport sector and the safest mode on the road, and we work hard to achieve that. Education and training of our staff is a key focus – professional drivers are something else than private car drivers.

**Proposals to address driver shortages in the bus and coach sector**

The bus and coach industry are facing unprecedented and severe driver shortages across many member states, resulting in a level of service which is sub optimal and in many cases resulting in operators being unable to deliver a full timetabled service. With a rapidly ageing workforce which will be a much bigger problem in the next five years, a lack of young drivers is one of the main challenges for the public transport sector. We would therefore welcome the revision of current minimum age requirements for category D-licence holders and the harmonisation of the minimum age for professional bus drivers to eighteen. Whilst some member states have derogations, in many cases these are still set at an age greater than 18. This means that for young people considering a career, bus and coach driving is not accessible to them and the opportunities to recruit and train drivers is significantly diminished. Where this applies the 50km limitation, a rule that is regulated in the Driver Training Directive (Directive (EU) 2022/2561), should be consequently removed to provide more flexibility for bus and coach drivers and operators.

Lowering the professional driver age to eighteen does not compromise safety as recent studies have concluded and safety remains the key focus within the public and collective transport sector.

It would support the public transport sector in reducing its driver shortage, enabling it to run more frequent and reliable services and support Europe's environmental targets by providing an attractive, sustainable alternative to the private car.

The current age requirements create a barrier and reduce opportunities for young people to enter the profession. In most cases, people will have made a choice for vocational training before the age of twenty-one. If they do not have the choice of public transport, they move to other sectors and as a result, potential drivers for our industry are lost.

Revising the rules on professional driver age requirements is an opportunity to resolve this issue, provide young people with more choice, and support the public transport sector.

### **Studies prove that safety is a matter of training, not of age**

Evidence suggests that lowering the minimum professional driver age to eighteen is not a safety issue as safety is a matter of training, not of age. Statistics show that safety performance is not influenced by the age of entry into the profession (CARE Database, 2017). In fact, almost all accidents involving young drivers are caused by non-professional drivers (IRU, 2020; CARE database, 2017). A Dutch research study from the House of Representatives (Tweede Kamer, 2015) showed that there was no greater road safety and/or accident risk among younger drivers, too. Also, the Swedish study "Young drivers. Analysis of data from Arriva Memo 08, version 04 (EN) (2022)" provides additional proof.

In conclusion, reducing the minimum professional driver age to eighteen in the whole EU and remove the "50-km limitation" does not present any safety risk, would enable the industry to have access to younger drivers who wish to have a career in our industry and facilitate succession planning for a sector with an ageing profession as well as helping to alleviate the current significant shortage of bus and coach drivers across much of Europe, thereby helping to bring service delivery back to a level that will fulfil the needs of many depending on the public transport for their journeys to work, studies, tourist travels etc.

For further information in this matter please contact Deputy Managing Director Anna Grönlund, The Swedish Bus and Coach Federation, [anna.gronlund@transportforetagen.se](mailto:anna.gronlund@transportforetagen.se) + 46 70 612 71 74. Anna is also vice president of the IRU Passenger Transport Council.



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[IRU](#) is the voice of more than 900,000 road transport companies in the EU, including truck, bus, coach and taxi companies, which operate about 35 million vehicles. IRU is the official social partner recognised by the European Commission to engage in negotiations with trade unions on behalf of road transport employers in the EU. In total, the road transport sector employs over 5 million people.

[EPTO](#), the association of European Passenger Transport Operators, represents major private sector public transport operators in Europe who have the majority of their business awarded by open tendering and contracts. EPTO is committed to the development of the transport market through liberalisation of bus, rail and other similar transport mode.