Revision of the EU Driving Licence Directive

IRU position on the revision of the EU Driving Licence Directive

I. IRU POSITION

1. IRU proposals for the revision of the EU Driving Licence Directive
   - Clarify the provision that 18-year-old professional truck drivers with full training can drive freight transport vehicles in both national and international traffic.
   - Amend the Driver Training Directive (EU) 2022/2561 to:
     - remove the distance limits for young professional bus and coach drivers to carry passengers on regular services where the route does not exceed 50 kilometres (Article 5, paragraph 3, a) (ii);
     - allow young professional drivers below 21 years of age who are allowed to drive within their national territory, according to their national legislation, to also drive on the territories of other EU Member States that have adopted similar legislations; and
     - ultimately, align the minimum driving age limit for bus and coach drivers with those applicable to truck drivers (18 years).
   - Adopt an EU list of third countries whose official driver Certificate of Professional Competence (CPC) is recognised as meeting the EU’s professional driver training standards.
   - Create a genuine D1 driving licence that allows drivers to drive passenger transport vehicles of 21/22+1 seats (currently 16+1).
   - Allow young candidate drivers to start their professional driver training before 18 years of age, which would allow them to take the exam and begin driving as soon as they turn 18.
   - Allow trained 17-year-old professional road transport drivers to accompany competent and experienced professional drivers.
   - Advocate for the possibility to use a B driving licence to drive light commercial vehicles that have passed the 3.5 tonne threshold and passenger transport vehicles of up to “8+1” seats (due to the installation of additional road safety or low or zero-emission powertrains).
   - In addition, advocate to adjust the permitted mass of a B category for alternative drive vehicles to be above 4,250 kg, to adapt the category to the needs of heavier battery-carrying zero-emission vehicles for goods and passenger transport.
   - Recognise the existing driving experience of B licence holders already engaged in professional transport with vehicles below 3.5 tonnes and up to “8+1” seats on their path and training to obtain professional C and/or D licences, and propose recommendations to be added to the recitals of the Directive to encourage Member States to deploy appropriate “passerelle” schemes and provisions to support holders of a B licence with experience in commercial transport and under
In certain conditions, such as appropriate high-quality training, to obtain a C or D licence.

- Advocate for the digitalisation of driving licences.
- Advocate for the interoperability of digital platforms.
  - Give road transport companies the option to access available public/official databases covering information on temporary or definitive loss/withdrawal of professional driving licences, allowing them to verify the validity of their driving licences.
- In addition, the EC is invited to:
  - Issue a guidance note to EU Member States containing recommendations on how to best implement the new provisions related to ICT tools, including recommendations on how to combine ICT-based methods with the need for practical training, which is paramount to the driver profession. The guidance note should contain recommendations on the use of appropriate simulators.
  - Issue a formal letter to EU Member States clarifying that the EU Driver Training Directive does not prohibit training and exams/tests to be taken in any EU language, particularly in English.
  - Develop a dedicated Q&A online database for public consultation by any interested stakeholder (preferably as part of an EU-wide road transport vocational training platform/single window). It should contain competent and legally compliant answers to frequently asked questions.

2. **IRU proposals for an EU framework to recognise and exchange third-country professional driving licences**

   - An evaluation (competence test) of their knowledge and skills should be carried out, according to the conditions laid down in the EU Driver Training Directive. This should particularly cover specific requirements to ascertain the legitimacy of the holder’s driving licence and skills, such as the use of relevant up-to-date technology, including digital/smart tachographs, driving on the left (if relevant), with a specific focus on road safety. In-company, practical evaluations can be part of this evaluation. It is also suggested that a standardised evaluation framework should be worked out at the EU level.

   - Such an evaluation framework should make a distinction between third countries which have implemented driver training standards comparable to the EU and those that have not, whilst at the same time duly considering any agreements between the EU and third countries obliging the latter to apply the EU’s driving licence and driver training rules. In parallel, such a framework could consider drivers coming from third countries that are actively applying the ECMT Quality Charter.

   - Member States should offer appropriate technical support, including language assistance, to third-country drivers to facilitate the test-taking process.

   - An induction and competence training of up to 35 hours (minimum 24 hours and maximum 35 hours) to cover any potential gaps in the knowledge and skills of third-country drivers. This should cover, in particular, new technologies and road safety and, if relevant, driving on the left, with an exam to be passed, according to the conditions set out in the EU Driver Training Directive.

   - Member States should have the right to require a more comprehensive induction and competence test to ensure that C and D licence holders have the level required for their tasks, including in terms of specific geography, weather conditions, etc.

   - A probationary period could be established, i.e., of 1 year, to monitor these drivers’ safety performance, before a final recognition/exchange of their C or D
driving licences. In case of serious or repeated infringements or accidents, the recognition of their driving licence could be revoked and subject to passing a mandatory training and/or exam.

- It should be avoided that any condition induces discrimination between third-country drivers wishing to work for road transport companies established in the EU and third-country drivers working for third-country road transport companies with access to the EU market.

3. **IRU proposals to adapt and modernise professional driver training**

- Move specific training elements which are relevant to active professional drivers to the Driver Training CPC Directive to avoid repetition, in view of optimising training and avoid duplication (see Annex 1);

- Add relevant new training elements which the practice has shown will be needed for any new professional driver to improve road safety, such as on defensive driving, eco-driving, and new driving technologies (see Annex 1).

- Propose recommendations to open up the possibility for training centres to use company vehicles and equipment for the training and testing of drivers that accurately reflect their needs and include up-to-date vehicle technologies used by road operators.

- Abolish the “normal residence” principle for the exchange of driving licences and CPCs in the EU. Exams to obtain driving licences and certificates for professional competence (CPC) should not necessarily have to be taken in the country of residence but in any EU Member State to remove additional barriers and ensure high-quality driver training in line with EU standards.

- Reduce language barriers by allowing drivers to take their driving licence and CPC exams in additional foreign languages, including, should the need arise, with the help of appropriate interpreters.

- Enable the digitalisation of administrative procedures of authorities (renewal of driving licences, submitting evidence, etc.) to facilitate the obtention of the driving licence and CPC.

II. **ANALYSIS**

Over recent decades, commercial road transport – both passenger and goods – has established itself as the backbone of modern mobility and supply chains, serving European citizens safely and efficiently, while moving our societies and economies towards a sustainable and prosperous future.

Recent and current crises have further increased the role of commercial road transport in the economy and society, making it an essential, indeed core part of society’s functioning, with an unmatched door-to-door flexibility and adaptability potential. Road transport is capable of complementing – and in some cases replacing – broken mobility or supply services of other transport modes during crisis situations.

Some 4 million professional drivers are active in road transport and logistics today, making it a key employer in the EU. Professional drivers undergo solid training and regular retraining, making professional drivers, including young drivers, the safest drivers in Europe.
Yet, over recent decades, an acute driver shortage has become a permanent concern in European road transport and logistics, plaguing road transport companies and, above all, the European economy and mobility. Europe is currently missing over 0.5 million professional drivers, while barriers to enter the profession have never been so high.

If nothing is done, European mobility and supply chains are heading towards a major crisis. Mobility and essential supply shortages could potentially affect large segments of the European population.
The profession is also rapidly aging, in some cases by 1 year every 2-3 years. It is rarely on young people's radar, when considering future career choices, whilst those who are interested in joining the profession experience significant barriers, both financial and legal. In particular, the minimum driving age has become a real obstacle, preventing young people from joining the profession. There is an important gap between the moment young people finish school and when they can enter the profession, which in some countries and sub-sectors can reach 5-7 years.

If young people are unable to start driving when they finish school and start their professional life, they will, in most cases, seek opportunities in other sectors.
This is against the backdrop of a very high level of youth unemployment in Europe.

The reasons for the shortage are numerous and complex. The IRU adopted a vision, strategy and action plan to collectively address these challenges in an organised way, with short- and long-term measures and actions, in a genuine partnership with its public and private partners.

By endorsing the IRU position on EU Driving Licence, it is expected that the current share of young drivers (below 25 years) in the profession (6% for freight and 5% for passenger transport) would increase to 10% by 2030, placing the road transport industry on a solid, long-term rejuvenation path, with a number of positive side effects, such as the share of women drivers increasing also to 10% by 2030 in the EU.
PRACTICAL PROPOSALS FOR THE MODERNISATION AND RATIONALISATION OF PROFESSIONAL DRIVER TRAINING UNDER THE EU DRIVING LICENCE DIRECTIVE

The objective of the proposals below is to optimise professional driver training under the two schemes (driving licence and professional competence/CPC), focusing training on obtaining a professional C and/or D driving licence on the competence of driving as such, whilst moving core elements relative to professional competence to the CPC Driver Training Directive.

<table>
<thead>
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<th>Item as per the EU Driving Licence Directive</th>
<th>Text of Article</th>
<th>Proposed changes</th>
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| ANNEX II  
I. MINIMUM REQUIREMENTS FOR DRIVING TESTS  
4. Specific provisions concerning categories C, CE, C1, C1E, D, DE, D1 and D1E | 4.1.2. Rules concerning the type of transport concerned: goods or passengers;  
4.1.3. Vehicle and transport documents required for the national and international carriage of goods and passengers;  
4.1.5 The precautions to be taken during the removal and replacement of the wheels;  
4.1.6. Rules on vehicle weights and dimensions; rules on speed limiters;  
4.1.8. Reading a road map, route planning, including the use of electronic navigation systems (optional);  
4.1.9. Safety factors relating to vehicle loading: controlling the load (stowing and fastening), difficulties with different kinds of load (e.g. liquids, hanging loads, …), loading and unloading goods and the use of loading equipment (categories C, CE, C1, C1E only);  
4.1.10. The driver's responsibility in respect to the carriage of passengers; comfort and safety of passengers; transport of children; necessary checks before driving away; all sorts of buses should be part of the theory test (public service buses and coaches, buses with special dimensions, …) (categories D, DE, D1, D1E only). | To be moved to the CPC Driver Training Directive both in the Initial CPC for basic knowledge and Periodic CPC for changing rules. |
| ANNEX II  
8.1.9 Reading a road map, route planning, including the use of |  | To be moved to the Initial Driver |
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<th>The precautions to be taken when entering and exiting a vehicle in a safe way;</th>
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<td>7. Skills and behaviour to be tested concerning categories B, B1 and BE</td>
<td>7.4.10. Defensive and eco-driving: distance to the vehicle in front; curve overtaking, change of lane, priority; rules, speed limits;</td>
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<td>8. Skills and behaviour to be tested concerning categories C, CE, C1, C1E, D, DE, D1 and D1E</td>
<td>8.3.8. Defensive and eco-driving: distance to the vehicle in front; curve overtaking, change of lane, priority; rules, speed limits;</td>
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<td>8. Skills and behaviour to be tested concerning categories C, CE, C1, C1E, D, DE, D1 and D1E</td>
<td>8.3.8 Special road features (if available): roundabouts; taking roundabout with a large vehicle; right and left driving; railway level crossings; tram/bus stops; pedestrian crossings; driving up-/downhill on long slopes;</td>
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<td>8. Skills and behaviour to be tested concerning categories C, CE, C1, C1E, D, DE, D1 and D1E</td>
<td>8.3.5. Changing direction: left and right turns; changing lanes; making a U turn;</td>
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**Proposals for additional driving competences to be added to the Driving Licence Directive**

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<th>ANNEX II</th>
<th>4.1.6. Rules on vehicle weights and dimensions; rules on speed limiters; purpose and use of retarders/exhaust brakes;</th>
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<td>7. Skills and behaviour to be tested concerning categories B, B1 and BE</td>
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**8. Skills and behaviors to be tested concerning categories (from C to D1E)**

**8.1. Preparation and technical check of the vehicle with a bearing on road safety**

- Electronic navigation systems (optional)

**Training Directive CPC**
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<tr>
<td>ANNEX II 1. MINIMUM REQUIREMENTS FOR DRIVING TESTS</td>
<td>5.1. The driving of a vehicle with manual transmission shall be subject to the passing of a skills and behaviour test taken on a vehicle with manual transmission—</td>
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<td>A. THEORY TEST 4. Specific provisions concerning categories C, CE, C1, C1E, D, DE, D1 and D1E</td>
<td>If an applicant takes the test of skills and behaviour on a vehicle with automatic transmission this shall be recorded on any licence issued on the basis of such a test. Licences with this indication shall be used only for driving vehicles with automatic transmission.—</td>
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<td>'Vehicle with automatic transmission' means a vehicle in which the gear ratio between the engine and the wheels can be varied by use only of the accelerator or the brakes</td>
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<td>Any modern HDV or Coach that allows the manual electronic gear selection by the operator, if used in C or D Driver Testing, requires the issue of a Full Driving License for the relevant category, with no restrictions if the B test undertaken previously by the driver was done in a fully manual vehicle.</td>
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category, with no restrictions if the B test undertaken previously by the driver was done in a fully manual vehicle.

5.2. The vehicles used in tests of skills and behaviour shall comply with the minimum criteria given below. Member States may make provisions for more stringent criteria or add others.

Category C: A category C vehicle with a minimum authorised mass of at least 18,000 kg, a length of at least 8 m, a width of at least 2.40 m and capable of a speed of at least 80 km/h; fitted with anti-lock brakes, equipped with a transmission system providing for a manual selection of gears by the driver and recording equipment as defined by Regulation (EU) No 165/2014; the cargo compartment shall consist of a closed box body which is at least as wide and as high as the cab; the vehicle shall be presented with a minimum of 10,000 kg real total mass;

Category CE: Either an articulated vehicle or a combination of a category C test vehicle and a trailer of at least 7.5 m in length; both the articulated vehicle and the combination shall have a minimum authorised mass of at least 18,000 kg, a length of at least 14 m and a width of at least 2.50 m, shall be capable of a speed of at least 80 km/h, fitted with anti-lock brakes, equipped with a transmission system providing for a manual selection of gears by the driver, fifth wheel coupling and with recording equipment as defined by Regulation (EU) No 165/2014; the cargo compartment shall consist of a closed box body which is at least as wide and as high as the cab; both the articulated vehicle and the combination shall be presented with a minimum of 15,000 kg real total mass. Trailer must have a minimum of 2 axles, a King Pin for 5th Wheel connection, be a Minimum of 12 Metres in length and weigh no less than 4 Tonnes Unladen.

Category C1: A subcategory C1 vehicle with a maximum authorised mass of at least 4000 kg, with a length of at least 5 m and capable of a speed of at least 80 km/h; fitted with anti-lock brakes and equipped with recording equipment as defined by Regulation (EEC) No 3821/85; the cargo compartment shall consist of a closed box body which is at least as wide and as high as the cab;

Category C1E: A combination made up of a subcategory C1 test vehicle and a trailer with a maximum authorised mass of at least 1250 kg; this combination shall be at least 8 m in length and capable of a speed of at least 80 km/h; the cargo compartment of the trailer shall consist of a closed box body which is at least as wide and as high as the cab; the closed box body may also be slightly less wide than the cab provided that the view to the rear is only possible by use of the external rear-view mirrors of the motor vehicle; the trailer shall be presented with a minimum of 800 kg real total mass;

Category D: A category D vehicle with a length of at least 10 m, a width of at least 2.40 m and capable of a speed of at least 80 km/h; fitted with anti-lock brakes and equipped with recording equipment as defined by Regulation (EEC) No 3821/85;

Category DE: A combination made up of a category D test vehicle and a trailer with a maximum authorised mass of at
least 1250 kg, a width of at least 2.40 m and capable of a speed of at least 80 km/h; the cargo compartment of the trailer shall consist of a closed box body which is at least 2 m wide and 2 m high; the trailer shall be presented with a minimum of 800 kg real total mass;

Category D1: A subcategory D1 vehicle with a maximum authorised mass of at least 4000 kg, with a length of at least 5 m and capable of a speed of at least 80 km/h; fitted with anti-lock brakes and equipped with recording equipment as defined by Regulation (EEC) No 3821/85;

Category D1E: A combination made up of a subcategory D1 test vehicle and a trailer with a maximum authorised mass of at least 1 250 kg and capable of a speed of at least 80 km/h; the cargo compartment of the trailer shall consist of a closed box body which is at least 2 m wide and 2 m high; the trailer shall be presented with a minimum of 800 kg real total mass;

Testing vehicles for categories BE, C, CE, C1, C1E, D, DE, D1 and D1E which are not in conformity with the minimum criteria given above but which were in use on or before the moment of entry into force of this Directive, may still be used for a period not exceeding ten years after that date. The requirements related to the load to be carried by these vehicles, may be implemented by Member States up to ten years from the moment of entry into force of Commission Directive 2000/56/EC (1).