



Directive 2003/59/EC on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers

1. Information

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I am answering on behalf of an organisation or institutions (business organisation, NGO, public authority, etc.)

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Q1. Do you think that qualification and education of drivers engaged in the transport of goods or passengers by road have an important contribution to make to road safety?

☒ Yes,
☐ No

Comment:

This would only be one element among many to increase the consideration of the profession of driver and it will have to be weighted against the extra costs and the benefits connected to increased harmonization. Harmonisation in itself will not increase the consideration, particularly not if new requirements are seen as unrelated to local conditions but rather a centrally imposed requirements from EU.

Q2. Do you think that the level of mutual recognition of the profession currently stipulated in the Directive is sufficient or should a higher level of recognition be pursued?

☐ Yes, the current level of mutual recognition is sufficient,
☒ No, a higher level of recognition should be pursued,

Comment:

By higher level of recognition we mean that the system must develop to allow Member States to have better trust in each other. Overall problems concerning the lack of mutual recognition between Member States for initial qualifications and periodic training create difficulties for the business operations of road transport operators. The intentions of the Directive are probably sufficient on this point, but the application of the Directive in the Member States and the Commission's supervision is crucial for these intentions to be fulfilled. The Commission has to monitor bureaucratic barriers to accept training carried out abroad that are imposed outside of the Directive framework. There should be an EU electronic database or Member States should be allowed to online access other Member State database in order to verify that training requirements are met by the individual.

Q3. Do you think that the setting up of an increased harmonisation of requirements would increase the consideration of the profession of driver?



X Yes
No

Comment:

At EU level more harmonized rules at higher levels should in principle lead to increased consideration. But this would only be one element among many to increase the consideration of the profession of driver and it will have to be weighted against the extra costs and the benefits connected to increased harmonization. Harmonisation in itself will not increase the consideration, particularly not if new requirements are seen as unrelated to local conditions but rather a centrally imposed requirements from EU.

Q4. Do you think that the establishment of a common framework for the training and the testing, further harmonisation of the content of the training, and the setting of common requirements for training centres and instructors could further contribute to the objectives of the Directive?

X Yes
No,

Comment:

It's a yes and no answer. The NLA supports the establishment of common framework for the training and the testing, common requirements for training centres and instructors, under the condition that countries with high levels of training and instructors are not forced to lower their level. Also there needs to be room for taking local conditions into account such as teaching winter driving skills. The focus should be on policies and industry requirements that are established in the cooperation with social partners. There is a need for the definition of the European qualification framework (EQF) and profile that describes skills, knowledge and competencies. The Member States have to establish quality assurance systems for training institutes, the curricula, trainers and inspectors as well as step up their coordination, approval and the audit of the training centres. One way of achieving these effects is by allowing the market and the industry to be involved, even to offer training. This should contribute to guaranteeing a high level of knowledge and experience

Q5. Do you think that the Directive has contributed to increasing safety on European roads? Please explain your answer in the comments section.

Yes, significantly
X Yes, but only insufficiently
No, not at all

Comment:

Although there is a steady decrease of road accidents in the EU over the past decade, the contribution of the Directive to the road safety in the EU is impossible to quantify. There is no relevant research, evidence or impact assessment available in this respect, also the statistic data are unavailable or not relevant data are used; there is only a perception that there was a road safety improvement due to the Directive however without causation. Also the Directive has not been implemented correctly many places, which has reduced its impact on road safety. Therefore the NLA would describe the Directive overall contribution to road safety as not significant.

Q6.. Do you think that the Directive has contributed to the development of the level of professional competence of drivers?

Yes, significantly
X Yes, but only marginally
No, not at all

Comment:

Experience shows that the acceptance of the periodic training in the case of older and experienced drivers



remains a challenge as this category of drivers sometimes prefer to leave the profession (for example in the form of early retirement) than to undertake the training. In the present situation, the Directive has not contributed to the development.

Q7. Do you think that the Directive has facilitated the mobility of drivers in the transport sector?

- Yes, significantly
- Yes, but only marginally
- ☒ No, not at all

Comment:

The lack of mutual recognition by many Member States of driver training undertaken in another country seems to be caused by 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 qualifications and periodic training as experienced by the industry are substantially downplayed in the EC report from July 2012. Drivers seem to be discouraged to change jobs across the borders due to problems with driver training recognition experienced at the roadside checks.

Q8. Do you think that the Directive has contributed to the creation of a level playing field for drivers and undertakings?

- Yes, significantly
- ☒ Yes, but only marginally
- No, not at all

Comment:

The contribution of the legislative framework to the fair competitive conditions on the road transport market is impossible to quantify. The Directive has a potential to improve the level playing field, if it is applied correctly. At the same time, operators and drivers from Member States where the training centres sometimes engage in the race to the bottom in terms of price and quality might be in an unfair advantageous position. Different rules for financing (driver, company, state aid) of the training in Member States also distort the competition. Finally other factors are more important for a level playing field such as social conditions, enforcement etc.

Q9. Do you think that the alignment of the scope and the exemptions of Directive 2003/59/EC with the ones stipulated in Regulation 561/2006/EC would best increase clarity on the scope of the Directive? Alternatively, do you think that a separate system of exemptions would be the most adequate option?

- The scope and exemptions should be aligned with Regulation 561/2006/EC
- ☒ A separate system of exemptions should be elaborated

Comment:

Consideration should be made as to whether or not the reasons an individual is not considered to need to be subject to the laws surrounding driving time necessarily reflect the reasons why an individual should not need to be engaged in a driver continuous professional development programme. We would specifically insist on the inclusion of the agricultural vehicles drivers. However you also need to be aware of the implications on the inclusion of operations under a requirement for the digital tachograf.

Q10. Who do you think the regime of qualification and training of the CPC should apply to?

- To all drivers driving vehicles requiring a C or D licence.
- ☒ Only to professional drivers driving vehicles requiring a C or D licence
- To all professional drivers, including drivers of certain vehicles requiring other licences.



Comment:

See answer to Q9 – But the objective is not more regulation, but to ensure that vehicles and drivers that are in competition, face the same requirements

Q11. Do you think the CPC training should be structured in such a way to offer an option between gradual access to professional driving at an earlier age on the basis of training and experience and direct access at a higher age?

- Yes
☒ No

Comment:

To our knowledge there is no scientific evidence that such approach applied to professional transport will contribute to achieve the directives' objectives: road safety, reducing the environmental impact, improve the image of the profession, etc.

Q12. Do you think that a new structure of the training based on modules should be introduced or do you favour the current free system?

- A new system based on modules and credits should be introduced
☒ The current system should be maintained
Other

Comment:

Harmonisation is necessary; however flexibility shall remain to avoid a one-size- fits-all as drivers perform different duties in different environments. The current system allows for meeting the specific requirements of drivers and hauliers. Customisation of periodic training according to customer/road transport operator needs shall remain an option combined with EU harmonised periodic modules established on the basis of EU Transport policy after consultations with the social partners.

Q13. How do you think the training should be certified as regards drivers obtaining the CPC in another Member State?

- ☒ By a requirement for the Member State, which issued the driving licence to mark code 95 on the basis of a valid CPC issued by another Member State.
By a requirement for the host Member State where the CPC was obtained to issue a separate driver qualification card to the driver.
Other

Comment:

The main problem is the application of the rules of the Directive and that there is a lack of mutual acceptance of the different systems in the Member States. However, this requires that the trust between the Member States is developed, which must be a task for the Commission. A possible solution would be a code 95, but other interim solutions could be considered, before the full trust exists and the objectives of the directive have been met.

Q14. Do you think that the establishment of a harmonised format of the CPC as a document becomes necessary, if the CPC becomes a mutually recognised document?

- ☒ Yes
No

Comment:

Absolutely necessary



Q15. Do you think that training for the CPC should be explicitly separated from other forms of training in order to preserve the specificity of the CPC training and its objectives?

Yes
☒ No

Comment:

There is a conflict here of two aspects. A high quality and relevant continuous training should be separated from the CPC training, on the other hand the persons – the drivers – need to feel that the training is not repetitious, or waste of time and resources for the hauliers.

Any specialised training such as ATP, live animals, ADR, etc. could qualify within CPC training as long as it covers the topics as listed in Annex I of the Directive.

Q16. Do you think the CPC test should be explicitly separated from the driving licence test?

Yes
☒ No

Comment:

It should be a possibility to separate the tests. There are drivers who do not need CPC. But the tests could be organized at the same time to facilitate.

Q17. Do you think that all drivers should have to undergo a minimum initial training before obtaining the CPC?

Yes
☒ No

Comment:

As for the training architecture the NLA does not want to prescribe arbitrary schemes this should be left to preferences of individual Member States. On the other hand whatever path is chosen it should be performance oriented.

Q18. Are the subjects listed in Annex I for the initial and periodic training relevant for the objectives of the Directive? If there are subjects you consider irrelevant, please indicate them.

Yes, very
☒ Yes, somewhat
No, not at all

Comment:

The list is rather exhaustive but leads to repetitions and in some circumstances goes into elements that are not relevant to driver's key day-to-day considerations (e.g. Module on human trafficking - the vast majority of drivers are not engaged in International transports). The main problem is that in many cases the topics in the directive have not been properly addressed in the training – this leads again to point that the intention of the Directive is positive but its generally poor implementation and the attached dilution has created the current sub-optimal situation.

More specifically:

- Amend section 1.1 by adding in the objectives the following topic: ...of it, and to know the different Euro emissions and Euro "low" Emissions Zones (LEZ).
- Amend section 1.2 by adding after objective the following items: specific features of hydraulic.... of failure, specific feature of advanced technologies such as AEBS, LDWS, ACC, ESP, specific features of device of indirect vision such as the use of camera-monitor, conventional mirror to mitigate blind-spot.



- Amend section 1.3 by adding in the objective the following topic: ...fuel consumption by using vehicle technologies and eco-driving behaviour.
- Amend section 1.4 by adding in the second § after main categories of goods needing securing based on accelerations, frictions factors, safety factors and test methods by considering securing direction, securing method and equipments, friction, dimensions/center of gravity and mass of cargo based on EU Best Practice Guidelines on Cargo Securing for Road Transport or existing standards such as EN 12195-1:2010. (delete as of ..., clamping... to the end).
- Section 1.6 shall be deleted as it is covered already in section 1.4, or shall be better specified if it is only for M2 and M3.
- Amend section 3.5 by adding in the main § after: .., summoning assistance – e-Call device if equipped,...

Q19. Are there other subjects which in your view are relevant to the training but are currently not listed in the Annex? If yes, please list them and explain why.

☒ Yes
☐ No

Comment:

The NLA would support stronger focus on Eco driving that can bring important financial savings in fuel and fleet costs significant reduce the CO2 emissions and improve fuel efficiency. Also has indirect impact on the reduction of the road risks, accidents and casualties and aims to address key elements of Annex I of the Directive however is simply not provided by many training centres and is therefore not undertaken by drivers. The NLA would also suggest that subjects could cover winter driving, coupling and uncoupling and setting of mirrors.

Q20. Do you think that the use of top-of-the-range simulators during the training is useful and should therefore be mandatory?

☐ Yes
☒ No

Comment:

Simulators shall not be mandatory, but could be recommended as they are useful. Top of range shall be defined and a possible "efficiency ratio" provided, e.g. ½ hr on simulator = 1hr driving, as they enable to directly train and assess specific driving skills. Furthermore, strict adherence to competition rules must be observed by the Member States.

Q21. Do you think that e-learning could make a useful contribution to the training and can therefore partially replace in-house training?

☒ Yes
☐ No

Comment:

E-learning shall be in any case allowed as a support for classroom deliveries. Furthermore, with the current learning technologies, monitoring capabilities allow to verify that the learning is undertaken. Additionally in a CPC Driver based on learning outcomes, a blended learning approach shall prevail with regular summative and formative assessments

Q22. Do you think there should be a uniform European syllabus for the periodic training?

☐ Yes



☒ No

Comment:

Too big differences in Europe. A uniform syllabus should not mean that drivers in the Nordic countries get more continuous training without basis training. The continuous training must have high degree of freedom as concerns content.

Q23. Do you think that there should be a test after the periodic training?

Yes

☒ No

Comment:

Many drivers can be very competent drivers, but very poor or inexperienced in an exam situation. Rather than focusing on exams, because there is great risk they give a wrong impression of the competences gained, we believe focus should be on ensuring the quality of the training. This relates both to the topics taught but also the manner in which they are being taught. The EU could focus more on ensuring that the trainers and the methods used fulfill the requirements. The effect of getting drivers to share and discuss experiences should not be neglected either, but it cannot be tested.

Q24. Do you think that the most efficient way of organising the periodic training is to concentrate it in a limited fixed period at the end of the 5 years period or to distribute it over the whole 5-year period?

Concentrate it in a limited fixed period at the end of the 5-years period

☒ Distribute it over the whole 5-years period

Other

Comment:

However there are many ways to distribute over 5 years.

The training shall be concentrated to assure success, but a rolling mechanism needs to be implemented to avoid bottlenecks. Also we believe that it could make sense to require the training to be carried out by the individual driver within a 6 month period, so a certain continuity is ensured; rather than allowing 1 day per year in a 5 year period. One issue for consideration might be to allow the road transport operators to plan for the periodic training in periods with less workload in order to maximize efficiency.

Experience shows that many hauliers are waiting to the last moment before they send drivers on training. A bottleneck is to be expected when we get closer to the end of the first period. So if too much freedom is given to distribute freely over the 5 years, a bottle neck can happen again. On the other hand, as stated in first paragraph, we need flexibility.

Furthermore, it is the prevailing view that 7 hours in a single session is too long for most people to sustain effective learning. If the minimum block were reduced to 5 hours then the net level of effective learning attained would not be reduced when compared to a 7 hour session. The total training requirement could therefore be for example reduced to 25 hours in 5 years; the level of effective learning on each of the 5 five-hour days would likely be no less than on each of the current 5 seven-hour days.

25. Do you think that a mechanism for the mutual recognition of parts of periodic training undergone in another Member State should be created?

☒ Yes

☒ No

Comment:

During the current conditions and the current directive we have concerns about more mutual recognition and there is a need for some kind of mechanism which will establish trust between member states and the training they provide. The flexibility in the directive does create situations, where the difference between the national requirements in one country and in another country, makes it reasonable not to recognize the training carried out in the other country. There are practices in the market that gives reason to this concern,



such as drivers from some EU-member states who apparently are able to get a training certificate from Friday till following Monday morning, if they go back home. These practices undermine the whole system, and must be eradicated before mutual recognition can become the rule.

26. Do you think that the Directive should regulate more in detail the requirements training centres have to meet in order to become an approved training centre?

Yes
☒ No,

Comment:

However, the system needs to ensure that the level and quality offered by training centers is acceptable.

27. Do you think that the Directive should regulate the requirements instructors have to meet in order to become approved instructors?

Yes
☒ No

Comment:

See Q27.

28. Are there any other aspect of the Directive you would like to comment on?

No.

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