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European Commission proposal for a new EU Driving Licence Directive

IRU position on the European Commission proposal for a new EU Driving Licence Directive

I. IRU POSITION

The EU Driving Licence Directive is critical to road safety and the facilitation of free movement across the European Union (EU). In addition, it provides the opportunity to tackle the shortage of drivers by opening the access of the profession to new categories of drivers, particularly young EU candidate drivers and third-country drivers. IRU makes several recommendations which are essential to improving the European Commission's (EC's) proposal and meeting these objectives.

IRU specifically calls for:

Truck drivers (C and CE categories)

- For both national and international traffic, set the standard minimum age for professional truck drivers with C and CE licences with required training at 18 years old as the rule.
- Specifying more detailed conditions for drivers accompanying trained 17-year-old professional drivers to ensure that they possess relevant professional and pedagogical skills.
- Extending the proposal for 17-year-old accompanied drivers to apply not only to C licences (driving rigid truck with no trailer only) but also CE licences (vehicle combinations with trailers and semi-trailers).

Bus and coach drivers (D1, D1E, D and DE categories)

- For both national and international traffic, set the standard minimum age for bus and coach drivers with required training at 21 years old as the rule.
- Lowering the minimum driving age for bus and coach drivers to 18 at the national level and removing the currently applicable 50km distance limitation for the transport of passengers.
- When Member States set the minimum age at 18, bus and coach drivers meeting such age requirements should be allowed to carry out cross-border operations on the territories of those Member States.
- Extending the scope of the D1 driving licence to include passenger transport vehicles of 22+1 seats (currently limited to 16+1 seats).

General (truck, bus, and coach drivers)

- Creating an EU harmonised framework for the recognition of third-country drivers' licences and Certificates for Professional Competence (CPC). The EC proposal targets only third country driving licences, which by itself does not enable access to the profession in the EU.
- Extending the facility provided to B category candidates to take exams outside of their EU Member State of residence in an EU Member State where they

master the language, also to professional truck, bus, and coach candidate drivers (C1/C1E, C/CE, D1/D1E and D/DE categories).

- Supporting the EC proposal to allow any B category licence holder to directly qualify for C1, C1E, C, CE, D1, D1E, D and DE licence categories without further intermediate steps.
- Supporting the EC proposal to digitalise authorities' administrative procedures for the obtention and renewal of driving licences.
- Clarifying that the probatory period applies only to the first EU driving licence obtained.
- Further adapting training to new vehicles and skills to better reflect safety, modern operations and driving technology.

Light-commercial vehicles for commercial transport (B category)

- Clarifying that the EC proposal which allows category B licence holders to drive alternatively fuelled vehicles of up to 4.25 tonnes applies to both goods and passenger transport vehicles (up to 8+1 seats).

II. ANALYSIS

Commercial road transport – both goods and passenger – is the backbone of modern mobility and supply chains, serving European citizens safely and efficiently while moving our societies and economies towards a more sustainable and prosperous future.

For over a decade, professional driver shortages have become a chronic problem across Europe – and they are only getting worse. According to IRU's industry survey, about 600,000 professional driver positions are currently unfilled in the EU. It's expected to further increase to above 1 million unfilled driver positions by 2026. The growing shortage of professional drivers has become a real threat to the EU's mobility, economy and supply chains.

With a rapidly ageing workforce, the lack of young drivers is one of the main challenges facing the European road transport industry, in both the goods and passenger transport. The current minimum age limitations for professional drivers, established by EU law, are a strong barrier preventing young Europeans, both male and female, from joining the profession. In addition, the divergent national transpositions across Europe create further restrictions and reduce opportunities for young candidate drivers to enter the profession, at a time when the EU's youth unemployment rate is over 14%.

The revision of the EU Driving Licence Directive is therefore an important opportunity to address these issues by harmonising the professional driving minimum age, modernising driver training, improving driver safety, and ultimately enhancing the image of the profession.

1. Minimum age to access the driving profession

The EC proposal falls short in meeting the road transport industry's requests regarding the minimum age to access the profession. For the industry, the main rule (and not a derogation, as proposed by the EC) should be that 18-year-old professional truck drivers with full initial training are allowed to carry out national and international operations.

Enabling professional truck drivers to access the profession at 18 years of age through the use of a derogation, as currently stated in the proposal, will lead to increased administrative burden and substantially higher insurance premium costs for operators. This will ultimately hinder young drivers' access to the profession and worsen professional driver shortages.

For both national and international traffic, set the standard minimum age for professional truck drivers with C and CE licences with required training at 18 years old as the rule, and at 21 with accelerated training as the exception.

Moreover, the proposal completely fails to consider the needs of bus and coach drivers. Firstly, the minimum driving age limit for bus and coach drivers across Member States should be clearly stipulated and aligned to 21 as a rule across all Member States. Furthermore, Member States should be allowed to introduce a national derogation, allowing 18-year-olds to drive without any restrictions at the national level.

In addition, young bus and coach professional drivers allowed to drive within their Member State at the age of 18 should also be allowed to drive and carry out operations within any EU Member States with similar age provisions.

Lastly, distance limitations for the transport of passengers for routes under 50km should be removed for young professional bus and coach drivers.

IRU calls for:

Trucks drivers (C and CE categories)

- For both national and international traffic, setting the standard minimum age for professional truck drivers with full initial training at 18 years old as the rule.

Bus and coach drivers (D1, D1E, D and DE categories)

- For both national and international traffic, setting the standard minimum age for bus and coach drivers with required training at 21 years as the rule.
- When EU Member States lower the minimum age for bus and coach drivers to 18 at national level, allow them to do so regardless of the number of kilometres driven (i.e., remove the currently applicable 50km distance limitation for the transport of passengers).
- When EU Member States set the minimum age at 18, bus and coach drivers having met such age requirements should be allowed to carry out cross-border operations in those Member States.

2. Allow young drivers to start accompanied driving from the age of 17

IRU welcomes the EC proposal to introduce accompanied driving for C (truck) driving licence holders at the age of 17. It will make the sector more accessible to young candidate drivers. Reducing the “school-to-wheel gap” is crucial to promoting the attractiveness of the driving profession to young people, including early school leavers. Accompanied driving enables young candidates to safely start their professional driving career, once they have completed the required initial training, under the guidance of a more experienced and competent colleague, rather than seeking professional opportunities in other sectors.

However, failing to extend this possibility to the CE driving licence category makes the EC proposal suboptimal and of little value, since these young candidates will need to redo another training to qualify for a CE licence category. Today, with less than 7% of young truck drivers being under 25 years of age in Europe¹, and a high proportion of drivers approaching retirement age, driver shortages are expected to worsen, reaching dramatic proportions in the next 10 years if no concrete action of the kind proposed by the industry is taken. Extending accompanied driving to drivers with a CE licence will enable young professional drivers to start driving C category vehicles from the age of 17 (accompanied) and CE category vehicles once they turn 18.

Moreover, the EC proposal sets a list of conditions that experienced accompanying drivers must comply with. Whilst welcoming this proposal, IRU also believes that there is a need to further specify the conditions for accompanying drivers, to ensure that they possess relevant and verifiable professional and pedagogical skills. At the same time, this would clarify the requirements and pathway for experienced and properly trained drivers, or dedicated trained member of the company staff, to become accompanying drivers, i.e., after having undergone a dedicated training course for trainers for at least seven hours as part of their periodic training.

¹ IRU Driver Shortage European Report 2022.

IRU calls for:

- Specifying more detailed conditions for drivers accompanying trained 17-year-old professional drivers to ensure that they possess relevant professional and pedagogical skills.
- Extending the proposal for 17-year-old accompanied drivers to apply not only to a C licence (driving rigid truck with no trailer only) but also a CE licence (driving articulated vehicles with trailers).

3. Facilitate the access of third-country drivers to the EU market

IRU welcomes the EC proposal to create an EU mechanism to identify and evaluate third countries with training and road safety standards comparable with the EU, thus removing current barriers for free movement of third-country professional drivers employed in the EU and the recognition of their rights across the EU.

In addition, for IRU, the renewal of an EU driving licence for third-country drivers by a Member State should be based on a revised definition of “normal residence”, which enables drivers to claim normal residence based solely on professional ties. By requiring both professional and personal ties, as it is currently stated in the proposal, professional drivers face additional administrative and financial burden for the renewal of their driving licence. IRU therefore proposes to introduce minor but targeted changes in the proposed text, namely “for at least 185 days in each calendar year because of personal **or** occupational ties”. In addition, to ensure safety, IRU believes that Member States should be allowed the possibility to introduce a probationary period at the first exchange of a third-country professional driving licence with an EU one, to be able to monitor their safety performance.

For IRU, the EC proposal fails to introduce a similar assessment mechanism for the recognition of third-country drivers’ professional competence (CPC), which is the second mandatory element for any professional driver to drive for an EU-based road transport company. To cover any potential gaps in the knowledge and skills of third-country drivers, additional competence training should be introduced (between 24 to 35 hours). These should cover specific EU rules, 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.

In addition, IRU supports the proposed introduction of a “Knowledge Network” and considers that this as an opportunity to exchange best practices for the integration of foreign professional drivers into the EU market.

IRU calls for:

- Allowing third-country drivers to renew their EU driving licence claiming normal residence based solely on professional ties.
- Allowing EU Member States to apply a probationary period to third-country drivers when exchanging their driving licence for an EU one for the first time.
- Creating an EU harmonised framework for the recognition of third-country drivers’ licences and Certificates for Professional Competence (CPC). The EC proposal targets only third country driving licences, which by itself does not enable access to the profession in the EU.

4. Probationary period for novice drivers

The EC proposal introduces a probationary period of at least two years for novice drivers, except for A and A2 driving licence categories. Member States must mark driver licences obtained under two years with a Union code (98.0 1) and are given the freedom to set further conditions to the probationary period of novice drivers, in addition to the common zero-tolerance rule on drink-driving.

This provision also applies to professional truck, bus and coach drivers with C/CE and D/DE licences. Yet, the application of the probationary period remains unclear, since it can be wrongly extrapolated that it applies to each new licence category obtained, and

the driver could be considered a novice driver every single time he/she obtains a new licence category and fall under the probationary period requirements. This would dismiss professional drivers' previous experiences as well as creating an additional barrier for them to obtain a higher licence category, i.e., C/CE or D/DE, ultimately hindering their professional development and career.

IRU calls for:

- Allowing third-country drivers to renew their EU driving licence claiming normal residence based solely on professional ties.

5. Language test derogation

IRU welcomes the EC proposal, which enables candidate drivers for a B category licence to take their driving examinations in their Member State of citizenship, when they do not master the language of their EU Member State of residence. EU citizens will therefore be able to take theoretical and practical driving examinations in their language if the Member State of residence does not offer that possibility.

IRU considers that the facility provided to B licence drivers should also be extended to professional truck (C1/C1E, C/CE), and bus and coach (D1/D1E and D/DE) candidate drivers. This provision will help to ensure that driving skills of novice professional drivers are accurately tested, rather than focusing on their language knowledge.

IRU calls for:

- Extending the facility provided to B category candidates to take exams outside of their EU Member State of residence in an EU Member State where they master the language, also to professional truck, bus, and coach candidate drivers (C1/C1E, C/CE, D1/D1E and D/DE categories).

6. Eliminate staging requirements between driving licences categories

IRU welcomes the proposal to remove the obligation to first obtain C1, C, D1 and D driving licences to be able to subsequently obtain a CE or DE driving licence. By removing this intermediary step, the proposal contributes to considerably reducing barriers and administrative and financial costs for professional driving candidates to obtain CE and DE licences and therefore access the profession.

IRU therefore supports the EC proposal to only require the possession of a B driving licence as the condition to qualify to obtain professional driving licences for *categories C1, C1E, C, CE, D1, D1E, D and DE*.

IRU calls for:

- Supporting the EC proposal to allow any B category licence holder to directly qualify to obtain category C1, C1E, C, CE, D1, D1E, D and DE licences without further intermediate steps.

7. Alternatively fuelled vehicles

IRU welcomes the EC proposal to adjust the permitted mass of a B category driving licence to be able to drive alternatively fuelled vehicles of up to 4,250 kg. However, the proposal fails to clarify that this provision also applies to passenger transport vehicles of "8+1" seats.

IRU calls for:

- Clarifying that the EC proposal which allows category B holders to drive alternatively fuelled vehicles of up to 4.25 tonnes applies to both goods and passenger transport vehicles (up to 8+1 seats).

8. Adapt vehicle categories

The EC proposal fails to consider the evolution of customer requirements, vehicles and fleets. With vehicle technology having advanced considerably, manufacturers can adapt to market demand and produce minibuses of higher capacity than the ones set for D1

vehicles (currently limited to 16+1 seats). However, the operation of these new minibuses with increased passenger capacity will require the adaptation of the category D1 driving licence to reflect these new capacities.

IRU therefore would welcome the extension of the D1 category from 16+1 seats to 22+1 seats to accurately reflect the evolution of market demand and fleets.

IRU calls for:

- Extending the scope of the D1 driving licence to include passenger transport vehicles of 22+1 seats (currently limited to 16+1 seats).

9. Modernise skills and vehicle for training and testing

IRU supports further adapting and modernising driver training to better reflect the specificity and dynamic nature of the truck, bus and coach driver professions to better adapt to current and future challenges and industry needs (digitalisation, automation, alternative powertrains, specific subsectors, specific local needs, etc).

To ensure the recognition of professional drivers' skills and optimise training, IRU invites legislators to move specific training elements relevant for active professional drivers training to the CPC training Directive to avoid duplication, whilst at the same time removing training elements that have become obsolete to optimise training.

IRU also invites to add relevant new training elements, as proposed by the industry in the annex of [this document](#), to the EU Driving Licence Directive to adapt driver training to modern operations, driving technology, safety, and the environment. In addition, IRU proposes to introduce provisions to enable training centres, in collaboration with private companies, to use training and testing vehicles that better reflect the technology used by road operators, while also better preparing any potential candidate for driving heavy-duty vehicles in the real world.

IRU calls for:

- Streamlining, simplifying and adapting driver training to new vehicle technologies (see IRU's detailed proposals in the annex of [this document](#)).
- Adding new training elements which practice has shown to be needed to further improve professional drivers' safe driving (eco-driving, defensive driving, and driving assistance systems, including Dynamic Road Safety Aids).
- Moving selected relevant training-specific elements listed in the EU Driving Licence Directive to the Certificate of Professional Competence (CPC) and removing training elements which have become obsolete to avoid duplication.
- Enabling the possibility for training centres, in collaboration with private companies, to use company vehicles and equipment for the training of drivers that more accurately reflect up-to-date vehicle and technologies used by road operators and better prepare driver candidates to the profession.
- Introducing dedicated training elements to the training of non-professional drivers to allow them to better understand the specificity and dynamics of large vehicles and reduce accident risks.

10. Digitalisation of driving licences

IRU welcomes the introduction of an EU-wide digital and mobile driving licence accessible through a mobile phone or other digital devices and recognised across the EU. An EU mobile driving licence is expected to simplify the administrative process for the replacement, renewal or exchange of driving licences, making it possible to perform the procedures online and aligned with achieving paperless vehicles.

IRU calls for:

- Supporting the EC proposal to digitalise administrative procedures of authorities for the obtention and renewal of a driving licence.

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