



European Transport Safety Council

Position on the Revision of the Driving Licence Directive 2006/126/EC

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1. Background

The European Commission is currently preparing a major revision to the EU Driving Licence Directive (2006/126). A main objective of the legislation is to enhance road safety: contributing to 'Vision Zero' and the targets of reducing road deaths and serious injuries by 50% by 2030. The legislative framework is also there to facilitate freedom of movement.

18,844 people lost their lives in road traffic in the EU in 2020.¹ In addition, around 120,000 people were seriously injured on EU27 roads in 2019 according to European Commission estimates.² Moreover, every week in the EU an average of 100 young people die on the roads and hundreds more are seriously injured.³ Changes to driver licensing rules can help prevent many of these deaths and injuries.⁴

The recent EC evaluation of the implementation of the last revision of the Driving Licence Directive in the EU indicated that the law had a positive effect on road safety, and that future changes could contribute to the new EU targets.⁵ This position paper presents ETSC's recommendations for the upcoming revision prioritising the elements which will have the highest potential for saving lives and preventing serious injury.

¹ ETSC (2021) ETSC PIN Flash Report 41 Reducing Road Deaths Among Young People Aged 15 to 30 <https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/>

² European Commission Press release (11 June 2020), Road safety: Europe's roads are getting safer but progress remains too slow <https://bit.ly/38CDjft>

³ ETSC (2021) ETSC PIN Flash Report 41 Reducing Road Deaths Among Young People Aged 15 to 30 <https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/>

⁴ ETSC (2021) ETSC PIN Flash Report 41 Reducing Road Deaths Among Young People Aged 15 to 30 <https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/>

⁵ European Commission, Staff Working Document (2022) Evaluation of the Directive 2006/126/EC of the European Parliament on driving licences <https://eur-lex.europa.eu/legalcontent/EN/TXT/?uri=CELEX%3A52022SC0017&qid=1644238491840>

2. Graduated Driver Licensing and Probationary Periods

The introduction of a graduated driver licensing (GDL) system is the most effective way of reducing collision risk on the roads for novice drivers of all ages, but the benefits are largest for young drivers.⁶ The revision of the Driving Licence Directive offers a unique opportunity to encourage more Member States to introduce GDL systems. Graduated Driving Licences (GDL) usually have three parts: the learner phase, the intermediate phase and the beginner's licence phase.⁷ They are primarily used to address young drivers' inexperience, but they also serve to address risk-taking behaviour which can result from age-related factors.⁸

Stronger systems are those that have a combination of minimum learning periods (such as accompanied driving) and probationary phase restrictions. The longer the minimum learning periods and the more restrictions in the probationary period, the more effective the system has been shown to be.⁹ At present 18 EU countries have a probationary period and five have a graduated or multiphase driving licence.¹⁰ Exemptions are permissible to ensure that young people are not denied access to employment and educational opportunities.

Some Member States allow young people to begin learning at an earlier age than normal, provided they undertake a certain amount of accompanied driving during their training or only drive accompanied until they reach a certain age.¹¹ Driving accompanied by an experienced driver allows learners to practice and reinforce skills learnt during formal training and gain valuable on-road experience outside of structured lessons.¹² It is associated with

⁶Kinnear, N. et al (2013), Novice Drivers: Evidence Review and Evaluation – Pre-driver education and training, Graduated Driver Licensing and the New Drivers Act: Full Report, p. 77.

<https://goo.gl/Shq3Sv> / Russell, K.F., et al (2011), Graduated driver licensing for reducing motor vehicle crashes among young drivers. Cochrane Database of Systematic Reviews.

<https://goo.gl/t4Oi3X>

⁷ Full Overview in ETSC PIN Flash Report 41 (2021) Reducing Road Deaths Among Young People Aged 15 to 30 <https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/>

⁸ OECD (2006), Young drivers, The road to safety. <https://bit.ly/3id82W5>

⁹ Kinnear, N. et al (2013), Novice Drivers: Evidence Review and Evaluation – Pre-driver education and training, Graduated Driver Licensing and the New Drivers Act: Full Report, p. 77. <https://goo.gl/Shq3Sv>

/ Russell, K.F., et al (2011), Graduated driver licensing for reducing motor vehicle crashes among young drivers. Cochrane Database of Systematic Reviews. <https://goo.gl/t4Oi3X>

¹⁰ Full Overview in ETSC PIN Flash Report 41 (2021) Reducing Road Deaths Among Young People Aged 15 to 30 <https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/>

¹¹ ETSC (2016) Reducing Casualties Involving Young Drivers and Riders in Europe <https://bit.ly/3NzNjaU>

¹² ETSC (2016) Reducing Casualties Involving Young Drivers and Riders in Europe <https://bit.ly/3NzNjaU>

higher test pass rates and safer driving and can take place before and after the practical test.¹³ Effectiveness depends on the number of accompanied driving hours and the variety of routes and environments encountered.¹⁴

- Introduce Graduated Driving Licence systems to address the high risks faced by new drivers and riders thus allowing them to gain initial driving experience under lower-risk conditions between gaining the learner permit and fully-licensed status.
- Encourage higher levels of accompanied driving while novice drivers are learning and gaining experience.

¹³ Wells P, et al, 2008, Cohort II: A Study of Learner and New Drivers. Volume 1: Main Report, Road Safety Research Report No. 81. UK Department for Transport, p1. <https://goo.gl/cj2L7Q> ETSC (2016) Reducing Casualties Involving Young Drivers and Riders in Europe <https://bit.ly/3NzNjaU>

¹⁴ SWOV, 2015, Fact Sheet – Accompanied Driving, p2. <https://goo.gl/eK3BSV> ETSC (2016) Reducing Casualties Involving Young Drivers and Riders in Europe <https://bit.ly/3NzNjaU>

3. Zero Tolerance for Alcohol and Drugs During the Probationary Phase

Young people, especially young men, are over-represented when it comes to road deaths linked to drink-driving.¹⁵ Young people have a high exposure and susceptibility to alcohol impairments due to their age and related behavioural traits. They have a lower tolerance level for alcohol. Illegal drug use among young people is double that among adults.¹⁶ It is known that young people, especially young men and those with sensation seeking and risky behavioural traits, are more likely to drug drive.¹⁷ Increased socialising with peers increases their exposure to these substances, as well as the likelihood of more night-time road use, as they travel to and from social events. The European Commission recommends lowering the BAC limit for novice drivers to 0.2 g/l.¹⁸ And yet, five EU countries, Belgium, Bulgaria, Denmark and Finland have a 0.5 g/L limit and Spain a 0.3 g/L¹⁹ limit.²⁰ ETSC recommends that EU Member States, introduce a zero-tolerance system for illicit psychoactive drugs using the lowest limit of quantification that takes account of passive or accidental exposure.²¹

- Introduce probationary periods for novice drivers with limits on driving with peer passengers, at night, a zero tolerance for drink/drug-driving and introduce/stricter demerit systems.

¹⁵ EMCDDA, (2012) Driving Under the Influence of Drugs, Alcohol and Medicines in Europe — findings from the DRUID project, p. 19. <https://goo.gl/PNhUpU>

¹⁶ Twisk and Stacey (2007) Trends in young driver risk and countermeasures in European countries, Journal of Safety Research, p7. <https://goo.gl/8jcUi0>

¹⁷ DRUID (2012) Final report, p55. <https://goo.gl/U6s1ii>

¹⁸ European Commission Recommendation (2001) on the maximum permitted blood alcohol content (BAC) for drivers of motorised vehicles. <https://bit.ly/3b6iH0x>

¹⁹ Spain's BAC limit for novice drivers (0.3g/L) is lower than the national general limit of 0.5g/l.

²⁰ ETSC (2019) Blood Alcohol Content (BAC) Drink Driving Limits across Europe <https://bit.ly/33kZEv2>

²¹ ETSC PIN Flash Report 41 (2021) Reducing Road Deaths Among Young People Aged 15 to 30 <https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/>

4. Minimum Standards for Driver Training and Testing

The fundamental goal of pre-licence training and the licensing process should be to create drivers who are safe, and not just technically competent, by the time they are permitted to drive unsupervised. This involves instilling novice drivers with an appropriate cognitive skill level and safety-oriented motives.

ETSC supports the development of minimum standards (beyond Annex V) to include a Goals for Driver Education (GDE) Matrix for driver training with gradual alignment in the form, content and outcomes of driving courses across the EU.

4.1 New Content and Methods for Training and Testing

Driver training and testing needs to be updated to include the use of new technologies and to prepare for semi and fully automated driving. New cars, vans, lorries and buses sold in Europe are fitted as standard with a range of new vehicle safety features, according to the updated General Safety Regulation 2019/2144 requirements.²² Driver training and testing needs to be updated in the short-term to include the use of the newly mandated technologies. The use of (non-mandatory) advanced driver assistance systems also need to be considered in terms of training, such as how to use, for example, comfort systems that are capable of continuously assisting the driver in keeping the vehicle in lane. In the medium-term, driver training and testing should be adapted to prepare drivers for using vehicles with semi and automated driving systems, notably when these automated driving systems can only handle select traffic environments and where the driver may be requested to take back control.

Content should also be updated to include other issues listed below in the recommendations such as first aid²³ and interaction with vulnerable road users.

Hazard perception aims to enhance the ability of road users to detect and avoid hazards. Studies show that, overall, hazard perception training has a positive effect on safety, leading to enhanced hazard perception abilities, as well as reduced collision rates and lower driving

²² General Safety Regulation 2019/2144 <https://eur-lex.europa.eu/eli/reg/2019/2144/oj>

²³ ETSC (2019) An Overview of Post Collision Response and Emergency Care in the EU <https://bit.ly/3IjfMPX>

speeds.²⁴ Building on the existing Annex II on “recognising traffic dangers” hazard perception driver and rider training (and testing, see section below) should be introduced in all EU Member States. Hazard perception training can also be conducted on driving simulators. Driver training should also include night time driving.

4.2 Quality Standards for Training

Quality standards for types of training should be defined based on competences that have to be acquired. Training should encourage young learners to think about their limitations as a road user, their motives for wanting to learn to drive or ride, their attitude to safety and the specific risks they face.²⁵ Research has concluded that higher levels in the Goals for Driver Education Matrix (GDE) matrix²⁶ during driver education help produce more inherently safe drivers.^{27, 28} However, these competences are also more difficult to test, hence the need for risk awareness, including, for example, the risks of drink driving, to be adequately included in driver training quality standards. The form of training should be adaptable to different learning styles.

The minimum standards on ‘form’ should also be defined and included when driver simulators and digital learning tools or ‘in classroom’ or ‘in car’ is best. Driving simulators can be used for teaching certain content such as the effects of drink driving or reacting to danger. A full list of driving simulator uses including the role of the driver trainer accompanying the learner should be set out within the minimum training standards. Alternatives to simulators must be given for those suffering from simulator sickness.

Digital learning tools can also be used in driver training. Here too, minimum standards should be developed to ensure quality and effectiveness within online driver training, including checking learning outcomes. These standards should include selecting those subjects where digital self-learning is best deployed and those which need an interactive session with group discussion.

²⁴ Katrakazas, C. (2017), Education – Hazard perception training, European Road Safety Decision Support System, developed by the H2020 project SafetyCube. Retrieved from www.roadsafety-dss.eu on 02.06.2021.

²⁵ SafetyNet, 2009, Novice Drivers, p23. <https://goo.gl/GsJYMZ>

²⁶ Keskinen, Peräaho & Laapotti, (2010) GDE-5 SOC. In ETSC (2017) Reducing Casualties Involving Young Drivers and Riders in Europe See Section 3.2.2 for Overview of full GDE Matrix and all references. <https://bit.ly/3PBKkiO>

²⁷ SafetyNet, 2009, Novice Drivers, p25. <https://goo.gl/GsJYMZ>

²⁸ CIECA, 2007, “Integrating the GDE matrix into category B driver training and the practical driving test”, p5. <https://goo.gl/SefKAw>

Minimum standards in training also help to counter the tendency among applicants for a driving licence to prepare for the theoretical exam only by practicing quizzes, with the consequence of obtaining inadequate training.

- Develop minimum standards (beyond Annex V) to include Goals for a Driver Education (GDE) Matrix for high quality driver training and traffic safety education with gradual alignment in the form, content and outcomes of driving courses across the EU.
- Training and testing should also address the skills and attitudes associated with safe road use, including a strong focus on hazard perception.
- Develop and introduce a European syllabus for first aid training, including guidance for the training of the trainers.²⁹
- Ensure all new drivers are trained in using new technologies and in hybrid and electric vehicles and semi and fully automated driving in the medium term.
- Include in driver training how to behave if an emergency vehicle is approaching and what to do at the site of a collision.³⁰
- Include training on interaction with vulnerable road users, including motorcyclists, and in risks of distraction as part of the syllabus of training of all drivers.
- Introduce a new specific module, offered within the context of initial driver training, that covers ‘driving for work’.³¹
- Examine expanding post-licence continuous training for non-professional drivers.

4.3 Minimum Standards for Driver Testing

The Directive sets minimum requirements for testing. Testing plays an important role in setting the competency levels required for licensing and judging a candidate’s performance in a number of areas. Tests also set the competencies that determine what candidates will learn during their training. Tests should also address the skills and attitudes associated with safe road use, such as hazard perception. Drivers and riders also need to have access to a range of driving environments. The tests need to be long enough to give examiners the best chance of properly assessing a candidate’s abilities.

In terms of content, during a test, examiners need to be able to check that learners have the necessary skills-based competencies, but also that they are capable of driving safely in regular traffic. Tests must accurately reflect the realities of driving and riding and, as this changes, testing must be able to adapt as well.

- Establish a hazard perception test. Incorporate the higher-level Goals for Driver

²⁹ ETSC (2019) An Overview of Post Collision Response and Emergency Care in the EU <https://bit.ly/3IjfMPX>

³⁰ Ibid

³¹ ETSC (2015) PRAISE Report ‘Managing Young Drivers at Work’ <https://bit.ly/3wG1czf>

Education (GDE) components into testing.

- Ensure testing allows examiners to ascertain a safe driving style by including aspects such as independent driving.

4.4 Rider Training and Testing

High quality training and testing is also crucial for safe motorcycling.

- Make theoretical and practical training as well as a comprehensive practical test mandatory to obtain an AM driving license and establish minimum standards for theoretical and practical training for AM and other categories of motorcycle.
- Introduce hazard perception training and testing also for motorcyclists; expand formal training to cover riding style including risk awareness, perception, risk of distractions, as well as skills.
- Ensure that motorcycle tests remain valid for new technologies.

4.5 Further Harmonisation of Minimum Standards for Driving Examiners and Trainers

The current Driving Licence Directive set new minimum standards for driving examiners (Annex IV), including initial training and qualification and periodic training. ETSC supports further improvements including the requirement of a stricter minimum educational level for driving examiners, as well as high quality periodic training including on hazard perception. The quality of driving examinations should also be assured through independent exam organisations and their objective evaluation. No requirements are set by the current driving license directive for driving trainers. That should change. ETSC supports the harmonisation of minimum standards for driving trainers.³²

- Further harmonise minimum standards for driving examiners including periodic training, hazard perception training, stricter minimum education and communication skills.
- Set minimum standards for driving trainers including initial training and qualification, periodic training, hazard perception training, strict minimum education and communication skills.

³² CIECA (2007) Minimum European Requirements for Driving Instructor Training MERIT <https://bit.ly/3AYUmrC>

5. More Effective Medical Fitness Checks

Annex III of the current EU directive sets minimum standards for physical and mental fitness to drive. The directive states that if an applicant for a driving licence has at least one of the conditions listed in Annex III, they must undergo a medical examination prior to obtaining their licence. Member States can go beyond those minimum EU standards, and the majority do.³³

The EU directive does not mandate initial, nor periodic medical checks for group 1 drivers. At present eight EU Member States require more frequent and thorough screening as drivers age.³⁴ Whilst ten Member States require regular medical checks throughout a driver's life, others do not require regular testing.

Studies have concluded that specific medical conditions, substance abuse, mental disorders, epilepsy and diabetes are more important factors than age when it comes to medical fitness to drive.³⁵ Mandatory age-based screening of older drivers has not been shown to be effective in preventing severe collisions.³⁶ ETSC would support the introduction of a screening protocol in order to increase consistency in assessing driver's medical fitness to drive across the EU.³⁷

Annex III currently does not address drivers who show an accumulation of offences or a particular manifestation of anti-social behaviour.

- Review and update Annex III on minimum standards of physical and mental fitness, in particular on alcohol abuse and neurodevelopmental disorders.
- Update Annex III to include deviant and hazardous behaviour.
- Develop an effective and transparent screening protocol based on international good practice to help medical professionals detect potential medical conditions.
- Develop and promote evidence-based guidelines for family doctors and psychologists involved in assessing the functional capabilities of someone suspected of being an unfit driver.
- Support Member States in developing and evaluating educational programmes for

³³ ETSC (2021) PIN Flash Report Are medical fitness to drive procedures fit for purpose? <https://bit.ly/3y9YqML>

³⁴ ETSC (2021) PIN Flash Report Are medical fitness to drive procedures fit for purpose? <https://bit.ly/3y9YqML>

³⁵ ETSC (2021) PIN Flash Report Are medical fitness to drive procedures fit for purpose? <https://bit.ly/3y9YqML>

³⁶ ETSC (2021) PIN Flash Report Are medical fitness to drive procedures fit for purpose? <https://bit.ly/3y9YqML>

³⁷ *ibid*

family doctors that are both effective and accepted by medical practitioners.

- Organise regular meetings of the Driving Licence Committee and facilitate the exchange of good practice between traffic medicine, psychology specialists and national driver licensing agencies as the evidence base continues to develop.
- Include under, Annex III, the expertise of traffic psychologists and neuropsychologists for the assessment of mental fitness.

6. Conditional Licences and Alcohol Interlock Rehabilitation Programmes

The 3rd Driving Licence Directive includes a number of conditional codes (codes 61 to 69) that can be included on a driving licence which permit driving under certain circumstances for those known to have some medical issues, enabling such drivers to retain some mobility. Code 69 applies when a driver is restricted to drive only a vehicle equipped with an alcohol interlock.

Driving while under the influence of alcohol poses a serious risk to road safety: 25% of all road deaths in the EU have been estimated to be alcohol related. Diagnostic, therapeutic and rehabilitation aspects of alcohol-use disorders have been neglected in the Directive and in many guidelines. The upcoming revision of the Driving Licence Directive represents an opportunity for review.

Alcohol interlock programmes give offenders who would normally lose their driving licence a possibility to continue driving, as long as their alcohol level is below a set value.³⁸ But the current EU Driving Licence Directive states that 'Driving licences shall not be issued to, or renewed for, applicants or drivers who are dependent on alcohol or unable to refrain from drinking and driving'. When the directive was adopted in 2006 alcohol interlocks were not widespread and very few Member States had programmes. The directive should be revised to enable the inclusion of these participants in alcohol interlock programmes. Including alcohol-dependent participants, with proper medical supervision, would increase participation and cut recidivism and driving without a valid licence.

In Finland, the Finnish Crash Data Institute (OTI) analysed data from in-depth investigations of fatal collisions between 2014 and 2018 and found that repeat drink-driving was common.³⁹

³⁸ ETSC (2021) PIN Flash Report Are medical fitness to drive procedures fit for purpose? <https://bit.ly/3y9YqgL>

³⁹ Finnish Crash Data Institute (OTI) cited in ETSC (2021) PIN Flash Report Are medical fitness to drive procedures fit for purpose? <https://bit.ly/3y9YqgL>
 Drink-drivers total: n=198, 100%, n=164, 82% had a valid driving licence, n=7, 4% hadn't ever had a driving licence, n=3, 2% had expired driving licence, n=19, 10% of drivers were in a driving ban, n=5, 2% no information

Of the drink-drivers, 38% had previous drink-driving convictions during the five years preceding the collision.⁴⁰ Consequently, the Finnish investigation teams recommend the use of alcohol ignition interlocks in the prevention of drink-driving. Moreover, another study in Finland examining the effectiveness of alcohol interlocks used by the offenders during the period 2008-2012 found that they had prevented at least 12 000 instances of driving while under the influence of alcohol (more than 0.5g/l; the legal limit).⁴¹

- Require Member States to report to the EC the scale of the use of conditional licences (codes 61 to 69), so as to aid monitoring and improvement.
- Encourage Member States to set up alcohol interlock programmes and apply Code 69 under which a driver is restricted to drive only a vehicle equipped with an alcohol interlock.
- Allow drivers with alcohol dependency to participate in rehabilitation programmes, and be issued with a conditional licence (code 69) with mandatory use of an alcohol interlock, as long as it is combined with medical supervision, and ideally that it also includes psychological monitoring before and during the programme.

7. Minimum Age for Solo-Driving

The younger a person starts unrestricted solo driving, the more likely it is that they will have a fatal collision, particularly below the age of 18.⁴² Thus, as a first step, it is extremely important to set an appropriate age for first unrestricted solo driving.⁴³ Raising, or not lowering, the minimum age for solo driving, will save lives, by virtue of the fact that it prevents young and inexperienced drivers from solo driving until they are older.⁴⁴ Conditions for driving motorised two-wheeled vehicles should be similarly stringent to prevent migration to less safe forms of transport.⁴⁵ ETSC is firmly against any lowering of the minimum age for any type of road user. Minimum ages for obtaining different categories of driving licence are set in the EU Driving Licence Directive but there is also some flexibility.

Few EU countries diverge from the minimum ages proposed in the EU Directive for category

⁴⁰ ETSC (2021) PIN Flash Report Are medical fitness to drive procedures fit for purpose? <https://bit.ly/3y9Yqml>

⁴¹ Marita Löytty, M. & Vehmas, A. Trafi Publications (2013) Effectiveness and impact of alcohol interlock-controlled driving rights

⁴² De Craen (2010) The X-factor: A longitudinal study of calibration in young novice drivers <https://bit.ly/3y1TR63> or more recent SWOV (2014) Brain development and crash risk of young novice drivers; A literature study <https://bit.ly/3yZrZ8W> In ETSC PIN Flash Report 41 (2021) Reducing Road Deaths Among Young People Aged 15 to 30 <https://etsc.eu/reducing-road-deaths-among-young-people-pin-flash-41/>

⁴³ OECD (2006) Young Drivers, The road to safety, Summary document, <https://bit.ly/2URvn6s>

⁴⁴ OECD (2015), Improving Safety for Motorcycle, Scooter and Moped Riders, <https://goo.gl/kAwsjq>

⁴⁵ Ibid

C (21 years) and for category D (24 years old). Data among young truck drivers show a higher risk rate.⁴⁶ Recently analysed data by the German Insurance Association shows that young HGV drivers aged 18-20 years cause a higher number of collisions resulting in personal injury, in relation to the number of licences registered for that age group, compared to all other HGV age groups. That proportion decreases considerably up to 24 years and remains stable in adult and older age groups.⁴⁷ A similar pattern emerges for bus drivers.⁴⁸ The results show a similar pattern of higher collision risk for young professional drivers as there are for young non-professional car drivers. There is no increase in the share of professional drivers causing a collision in older age groups unlike that seen among the general driving population.⁴⁹ In a study among truck drivers in New Zealand, the most self-reported crashes and the most self-reported violations were from the youngest truck drivers.⁵⁰

Detected causes of collisions in this risk group include: poor hazard detection (do not know what to expect and where to look), inattention/distraction (e.g. use of smart phones while driving), driving too fast for the circumstances (e.g. on bends), deliberate risk taking in order to alleviate boredom or to impress friends (e.g. speeding).⁵¹ This challenge cannot be solved purely by more training, driver education in higher order skills may partly solve the problem.⁵² Driver shortages among professional coach and truck drivers should be managed through improving working conditions and wages to retain current workers and attract new transport workers.

- Do not allow the lowering of the minimum age for any road users.

8. Mutual Recognition of Non-financial Penalties

RESPER (RESeau PERmis de conduire), the EU network for the exchange of driving licence

⁴⁶The highest crash risk of all age groups for truck drivers younger than 25 (USA, Cantor et al., 2010)
The most self reported crashes and the most self reported violations of the youngest truck drivers (New Zealand, Sullman et al., 2002)

⁴⁷ German Insurance Association (GDV) Comment on the Driving Licence legislation ex-poste evaluation 2022 Sources: Federal Statistical Office and Central Register of Driving Licences

⁴⁸ German Insurance Association (GDV) Comment on the Driving Licence legislation ex-poste evaluation 2022 Sources: Federal Statistical Office and Central Register of Driving Licences

⁴⁹ German Insurance Association (GDV) Comment on the Driving Licence legislation ex-poste evaluation 2022 Sources: Federal Statistical Office and Central Register of Driving Licences

⁵⁰ Sullman et al (2002) Aberrant driving behaviours amongst New Zealand truck drivers <https://bit.ly/3AN2bx7>

⁵¹ Sullman, Meadows, & Pajo, K.B. ,2002; Clarke, Ward, & Truman, 2005; Curry et al., 2011; McKnight & McKnight, 2003

⁵² Willem Vlakfeld, SWOV Presentation Stakeholder Conference on the Review of Directive 2003/59/EC

information acts as an EU-wide hub for information exchange between Member State driving licence issuing authorities. The main purpose of this platform is to ensure the ‘one person one licence’ principle, ensuring that drivers only drive vehicles in categories they are qualified for and assisting in combating document fraud by allowing Member States to verify the validity of licences issued by other countries. This is a relatively new network that still has some technical issues which should be resolved to improve its efficiency and use further. ETSC would support the improvement of the existing RESPER network and thus it’s increased use by EU Member States.

ETSC would also support the gradual introduction of the mutual recognition of non-financial penalties such as driving disqualifications. This would build upon the already existing Cross-Border Enforcement Directive 2015/413 which covers exchange on financial penalties for the main offences causing death and serious injury in the EU.⁵³

Non-financial penalties such as demerit point systems⁵⁴ have a strong deterrent effect and can improve road safety. Demerit point systems are known to reduce collisions and deaths when coupled with increased enforcement, effective follow-up and communication campaigns and when applying the recommendations set out in the BestPoint Study.⁵⁵ A 2012 meta-analysis study of European and non-European systems showed a decrease of between 15-20% in the number of collisions, deaths and injuries.⁵⁶ ETSC supports a gradual approach which could lead towards a common EU wide demerit point system as a long-term scenario.⁵⁷ ETSC recognises that the introduction would need to be introduced step-by-step. Previously an EU Convention on Driving Disqualifications (1998) was revoked due to a lack of EU Member State ratification.⁵⁸ This would start with setting up a demerit point system in every EU Member State.⁵⁹ The next step would be to introduce so-called ‘virtual’ driving licences whereby a non-resident driver has a ‘virtual’ Driving Licence opened.⁶⁰ Committed offences carrying penalty points are followed in a demerit system for the non-residents via a virtual license which can ultimately lead to a driving ban in that country for them as well.

⁵³ Directive 413/2015 facilitating cross-border exchange of information on road-safety-related traffic offences, <https://goo.gl/WnFrtQ>

⁵⁴ ‘A demerit point system assigns or detracts penalty points and results in additional punishment when the level of repeat offending has resulted in a certain number of penalty points being collected or lost;’ Definition: Van Schagen I., Machata K. (2012), The BestPoint Handbook: Getting the best out of a Demerit Point System. EU funded project, <https://bit.ly/3y9Yqml>

⁵⁵ The BestPoint Handbook: Getting the best out of a Demerit Point System. EU funded project, <https://bit.ly/3y9Yqml>

⁵⁶ SWOV, September 2012, Factsheet on Demerit Points, p2. <https://goo.gl/7KVjoK>

⁵⁷ Van Schagen I., Machata K. (2012), The BestPoint Handbook: Getting the best out of a Demerit Point System. EU funded project, <https://bit.ly/3y9Yqml>

⁵⁸ Convention on Mutual Recognition of Driving Disqualifications <https://bit.ly/3QSIzI>

⁵⁹ Van Schagen I., Machata K. (2012), The BestPoint Handbook: Getting the best out of a Demerit Point System. EU funded project, <https://bit.ly/3y9Yqml>

⁶⁰ Ibid

- Encourage the mutual recognition of driving disqualifications of all offences that are punishable with a disqualification under the law of the EU Member State in which the offence was committed.
- Encourage EU Member States to set up and implement a demerit point system which includes a set of fixed penalties for at least the eight major road safety related offences included in the Directive 2015/413 concerning cross-border exchange of information on road safety related traffic offences as recommended by the research project BESTPOINT.⁶¹
- Encourage EU Member States to introduce stricter demerit point systems during a probationary period for newly-licensed drivers with penalties such as loss of licence or mandatory traffic risk awareness training.
- Encourage all EU Member States to set up virtual driving licences with penalty points for non-resident drivers to deter recidivist offending.
- Encourage all EU Member States to recognise the virtual driving licence set up by other Member States for the follow up of penalty points for non-residents.
- Improve existing efficiency of the RESPER network and authorize Police to access RESPER to check driver license confiscations.
- Promote the use of digital driving licences to combat fraud.

⁶¹ Van Schagen I., Machata K. (2012), The BestPoint Handbook: Getting the best out of a Demerit Point System. EU funded project, <https://bit.ly/3y9Yqml>

9. Extend Professional Driver Training to all Professional Drivers

A total of 2630 people were killed in collisions involving Light Goods Vehicles (LGVs) in the EU in 2018 alone, representing 11% of all road deaths.⁶² LGV use in Europe is likely to continue to rise due to, for instance, the increased demand for home deliveries.⁶³

LGV drivers travelling for work are often under pressure to meet tight deadlines and this means that they are a group that are often likely to speed.⁶⁴ International transport operators using LGVs of over 2.5t will now be subject to EU rules for driving and resting times, and their vehicles will need to be fitted with tachographs, according to updated transport regulations.⁶⁵

The current requirements for bus and truck drivers, including the need for professional driver training (certificates of professional competence CPC), should also be extended to van and taxi drivers.^{66, 67}

- Extend the provisions set out for Group 2 drivers (professional training CPC Directive) to apply also to Group 1 drivers using their driving licence for professional purposes.

⁶² ETSC (2020) How to improve the safety of goods vehicles in the EU? PIN Flash Report 39 <https://bit.ly/3pFCEj6>

⁶³ For example, LGV traffic in the UK has increased by approximately 40% during the 2001-2010 period. In: DfT, THINK!

⁶⁴ ETSC (2014), PRAISE Report Managing the Road Risk of Van Fleets, page 33, <https://goo.gl/bGdAXd>

⁶⁵ Regulation (EU) 2020/1054 as regards minimum requirements on maximum daily and weekly driving times, minimum breaks and daily and weekly rest periods and Regulation (EU) 165/2014 as regards positioning by means of tachographs, <https://eur-lex.europa.eu/eli/reg/2020/1054/oj>

⁶⁶ ETSC (2014), PRAISE Report, Managing the Road Risk of Van Fleets, <https://goo.gl/bGdAXd>

⁶⁷ ETSC (2020), Position Paper on Vehicle Roadworthiness Package, <https://bit.ly/3kfZdl>

FOR FURTHER INFORMATION

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The European Transport Safety Council (ETSC) is a Brussels-based independent non-profit making organisation dedicated to reducing the numbers of deaths and injuries in transport in Europe.