



European Transport Safety Council

POSITION PAPER I

Revision of 2003/59/EC on
the Initial Qualification and
Periodic Training of Drivers
of Certain Road Vehicles
for the Carriage of Goods
or Passengers

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1. Introduction

The European Transport Safety Council¹ (ETSC) welcomes the initiative of the European Commission to review Directive 2003/59/EC on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers. One of its main objectives is to improve road safety and the safety of drivers.

In 2015, 26,300 people lost their lives on EU roads compared to 25,970 in 2014, representing an increase of 1% and the second consecutive poor year for road safety². In 2014, more than 135,000³ people were recorded as seriously injured. The most recent data from 2014, show that 3,863 people were killed in collisions involving HGVs of more than 3.5 tons and 751 were killed in those involving buses and coaches⁴. Nearly 4,000 deaths occurred in Europe in 2012 in collisions involving vans^{5,6}.

2. Background

Before the Directive's implementation in 2008 and 2009 very few EU drivers had followed professional competence training. The Directive includes a syllabus, which covers elements to improve road safety in general. An objective of the Directive is also to make drivers aware of the risks of the road and of accidents at work. Member States issue the driver with a certificate of professional competence (CPC), certifying his or her initial qualification or periodic training. These skills and knowledge are kept up-to-date through periodic training. Periodic training is designed to complement the individual driver's everyday work.

Driver training can be an important tool to reduce work related road risk. But it is only one part of an employer's road safety program, which should also focus on issues such as management culture, vehicle safety, journey and safety of sites. Simple skills-based training schemes do not suffice and training should always be integrated into a wider employer safety strategy⁷. Formal defensive driver training for professional drivers, taught

¹ With the exception of the Finnish Traffic Safety Agency (Trafi).

² ETSC, 2016, Annual Road Safety Performance Index (Pin) Report, 2016.

³ European Commission Press release, March 2016, <http://goo.gl/w0lQkv>

⁴ European Commission, 2016 Traffic Safety Basic Facts.

https://ec.europa.eu/transport/road_safety/sites/roadsafety/files/pdf/statistics/dacota/bfs2016_hgvs.pdf

⁵ ETSC, 2013, 7th Annual road Safety Performance Index (PIN) Report.

⁶ Goods vehicles with a maximum permitted mass below 3.5 tons.

⁷ ETSC, 2010 Fit for Road Safety : From Risk Assessment to Training.

at the workplace, combined in larger companies with a motivation and incentive system for crash-free driving, has been found to reduce the crash rate by around 20%⁸.

In-vehicle skills-based driver training is one type of training. Research suggests that driving is about more than just skills. Health, well-being, lifestyle, attitude, knowledge, hazard perception, attention to detail, hand eye co-ordination, concentration, anticipation and observation, coping with stress and aggressive driving and the reactions of others, are all important and should be reflected in the EU's CPC Directive⁹. As should new developments in road safety risks such as increased levels of distraction in the driver cabin.

Research in the field of driver training underlines four hierarchical levels permeating driving behaviour, and the need to design training to address each level¹⁰. These levels can be best visualised in the Goals for Driver Education matrix (GDE)¹¹. The two last and highest levels generally tend to be neglected, but should be an integral part of good training as they are very important for risk awareness as opposed to merely improving driving skills, which is the content of the two first and lowest levels¹². A fifth level has also been included in the latest version of the matrix, that includes not individual characteristics of the driver but rather the organisational setting within which the driving takes place and covers company awareness, characteristics, safety situation¹³. GDE-5PRO (PRO for professionals and their organisational environment) that helps describe the different situation of a professional driver and a private driver¹⁴.

⁸ Elvik, R. and Vaa, T. 2004 Road Safety Handbook, Elsevier, Amsterdam.

⁹ Murray, W. Pratt, S. Hingston, J & Dubens, EL (2009) Promoting Global Initiatives for Occupational Road Safety : Review of Occupational Road Safety Worldwide.
www.cdc.gov/niosh/programs/twu/global

¹⁰ Advanced Project. (2002)

¹¹ GDE Matrix, CIECA Project 2007 « Integrating GDE Matrix into category B Driver Training ».

¹² Ibid.

¹³ Keskinen, Peräaho & Laapotti, 2010, GDE-5PRO and GDE-5SOC: goals for driver education in a wider context – professional and private drivers in their environment (unpublished manuscript) University of Turku, Finland.

¹⁴ Ibid.

GDE-5 PRO

| | Knowledge and Skills | Risk increasing factors | Self-Evaluation |
|--|---|---|---|
| Level V Company awareness, characteristics, safety situation (organisational level) | In logistics, safety systems, management, economy | Productions/protection, feedback systems | Company's/organisation's company's motivational system, awareness of safety situation |
| Level IV Goals for life and skills for living | Lifestyle, age, group, culture, social position etc. vs driving behaviour | Sensation seeking, group norms, peer pressure | Introspective competence, own preconditions, impulse control |
| Level III Goals and context of driving | Modal choice, choice of time, role of motives, route planning | Alcohol, fatigue, low friction, rush hours, young passengers | Own motives influencing choices, self-critical thinking |
| Level II Driving in Traffic | Traffic rules, cooperation, hazard perception, automatisisation | Disobeying rules, tailgating, low friction, vulnerable road users | Calibration of driving skills, own driving style |
| Level I Vehicle Control | Car functioning, protection systems, vehicle control, physical laws | No seat belts, breakdown of vehicle system, worn-out tyres | Calibration of car control skills |

Recommendations for Post Licence Professional Driver Training:

- Course content should be based on the different levels of driver behaviour.
- There should be a balance between skills and risk awareness exercises.
- Overconfidence among participants should be recognised and discouraged. Trainers should have competence in recognising this behaviour.
- Training should be periodic, continuous training (training shouldn't be a one off)¹⁵.

¹⁵ Advanced Project, 2002, <http://www.cieca.eu/project/26>

3. Updating the syllabus

3.1 Initial training

With the revision of the CPC Directive, ETSC would welcome an update of the topics covered in the syllabus and a common approach pitched at reaching the higher level requirements of the Directive. At present the different transpositions and interpretations of the Directive in EU Member States lead to different requirements for drivers which also negatively affect the single market and potentially road safety.

Analysis of EU road safety trends including results from pre-crash reports and in-depth accident reports of collisions involving professional drivers should be used as a basis to inform the topics included in the syllabus of the driver training.

3.2 Periodic training

Under the periodic training requirements of Article 7, ETSC would support the EC's proposed amendment ensuring that periodic training includes at least one road safety related subject. Also that the same subjects are **not** repeated within the same training period and that the training is up-to-date with the latest developments in relevant technology and legislation and specific to the transport operations carried out by the driver.

3.3 Mutual recognition

The EC's proposal to provide effective mutual recognition of training within the EU is welcomed. It is currently difficult to establish comparable or complementary levels of training received within the Union. ETSC would welcome an agreement to establish comparable or consistent levels of training.

Recommendations

- Support effective mutual recognition of training within the EU, once comparable levels of training are established.
- Support the amendment to the periodic training requirements to ensure that they include at least one road safety related topic, are up-to-date with the latest developments in relevant technology, legislation and are relevant to the driver.

3.4 Updating of the syllabus: specific topics

3.4.1 Hazard perception

The current revision responds to the outcome of the consultation that found that the content of the training was found to be only partially relevant for drivers' needs. ETSC supports the EC proposal to improve the Directive's contribution to road safety in the initial training under Annex 1 by including subjects such as "danger recognition" and the "reinforcement of safe driving including the ability to anticipate, assess and adapt to risks in traffic". A reference to the Risk Awareness Database developed by CIECA could also be made in the Directive¹⁶. The examples in the database have all been provided by course providers and can be used or adapted.

3.4.2 Update of operation of safety controls

ETSC supports the EC proposal to update Annex 1 Section 1.2 Objective on technical characteristics and operation of safety controls, specifically the addition of Advanced Emergency Braking Systems (AEBS) as a priority. ETSC would support the inclusion of a regular update in the training for other new Advanced Driver Assistance Systems.

3.4.3 Inclusion of driver awareness of vulnerable road users

Cyclist and pedestrian collisions with goods vehicles and buses in the EU account for 22% of pedestrian deaths and for 24% of cyclist deaths¹⁷. Even though they are less frequent than collisions with light motorised vehicles, collisions involving goods vehicles or buses and pedestrians or cyclists tend to be more severe because of the vehicles' size and mass¹⁸. As pedestrians, cyclists and powered two wheelers are among the road users which occupy the smallest amounts of road space, sometimes in drivers' blind spots, they are particularly liable to be involved in collisions where other road users simply do not see them. Goods vehicles and buses have large size and mass which can result in vehicles designed for the carriage of goods and passengers having a reduced field of direct vision for their drivers. Driver training to raise awareness about what it is like to be a cyclist or pedestrian interacting with large vehicles, especially in urban environments, could help to reduce these collisions.

ETSC would support the EC proposed text to include driver awareness of what it is like to be a cyclist or pedestrian interacting with large vehicles in the revision of the Directive.

¹⁶ Advanced Project, 2002 <http://www.cieca.eu/project/26>

¹⁷ ETSC PIN, 2015, Making Walking and Cycling on Europe's Roads Safer.

¹⁸ *ibid*

3.4.4 Inclusion of the dangers of distracted driving

Driving whilst using a mobile phone and other electronic devices significantly impairs driving ability¹⁹. Distraction on the roads is a major source of concern. Driver distraction is thought to play a role in 20-30% of all road collisions.²⁰ The risks of distraction from mobile phones and other in-vehicle technology should be integrated into the syllabus of the CPC Directive under Annex 1 under Point 3.4.

3.4.5 Inclusion of a topic on coping with stress and aggressive driving

Emotions have a great influence on attention and driving style^{21, 22}. Professional driving can be a stressful activity, depending on the density of traffic, the urgency of the task and the reactions of the other road users. This is due to the long, irregular working hours, pressure to deliver on time as well as the physical demands of driving, and managing the traffic related context. Such pressures can have short, middle and long-term implications for the physical and psychological impact on behaviour²³. Drivers have to work under time pressure in a highly competitive environment providing a broad spread of tasks required by clients.²⁴ Some reports indicate that aggressive reactions are becoming more frequent²⁵. A professional driver must learn how to handle these reactions in such a way that it does not influence the driving in a risky manner. ETSC would support the inclusion of the subject: “dealing with stress and aggressive driving”.

Recommendations

- Include the subjects: “danger recognition” and “reinforcement of safe driving including the ability to anticipate, assess and adapt to risks in traffic” “dealing with stress and aggressive driving”.

¹⁹ IGES Institut, ITS Leeds, ETSC (2010): Study on the regulatory situation in the Member States regarding brought-in (i.e. nomadic) devices and their use in vehicles. Study tendered by the European Commission, Berlin 2010.

http://www.etsc.eu/documents/Report_Nomadic_Devices.pdf

²⁰ Dews, F. A., & Stayer, D. L. (2009). Cellular Phones and Driver Distraction. In M. A. Regan, J. D. Lee, & K. L. Young, *Driver Distraction Theory, Effects and Mitigation* (pp. 169-190). CRC Press.

²¹ Mesken, J., Hagenzieker, M.P. & Rothengatter, J.A. (2008). A review of studies on emotions and road user behaviour. In: Dorn, L. (ed.), *Driver behaviour and training Vol III; Human factors in road and rail transport; based on the contributions for the Third International Conference on Driver Behaviour and Training*, Dublin, 12-13 November 2007. Ashgate, Aldershot.

²² Levelt, P.B.M., (2002) *Emoties bij vrachtwagencheuffeurs*. SWOV Leidschendam, Nederland

²³ ETSC, 2010, PRAISE Report Fit to Drive.

²⁴ Eurofound European Foundation for the Improvement of Living (2004) *EU road freight transport sector: work and employment conditions*

<http://www.eurofound.eu.int/publications/htmlfiles/ef03102.htm>

²⁵ Parker, D., Lajunen, T. & Summala, H. (2002) Anger and aggression among drivers in three European countries. In *Accident Analysis & Prevention*, 34 (2002) p 229-235

- Update of the section on technical characteristics and operation of safety controls and the inclusion of a regular update on other Advanced Driver Assistance Systems.
- Include vulnerable road users (pedestrians, cyclists and powered two wheelers) with a special focus on urban traffic.
- Include the risks of distraction in the syllabus.

4. Minimum qualifications and training requirements

For both the initial and periodic training ETSC would welcome a shift to more quality in the training reaching “learning outcomes”²⁶. This would not result in a reduction of hours per year. “Learning outcomes” are defined as what a learner knows, understands and is able to do after completion of a learning process, as opposed to length of study.

Harmonisation of learning outcomes would ensure more consistent quality and contribute to better engagement in the training by the participants and increased professionalism amongst this group of workers. ETSC welcomes the suggestion of the EC to include a new reference to the European Qualifications Framework²⁷. ETSC would also welcome an assessment at the end of the training including also putting in place a procedure for those drivers who do not obtain the pass level in the assessment. The exact parameters could be set at Member State level; this would also increase driver engagement.

4.1 e-Learning and blended learning

The EC proposal amends Section 4 to allow Member States to make use of ICT tools for a part of the training, while ensuring the quality of the training. Use of ICT, in addition could be a supporting complement, but should not replace training. ETSC does not support this proposed EC amendment.

²⁶ European Quality Assurance Reference Framework for Vocational Education & Training Recommendation 2009/155/01 <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2009:155:0001:0010:EN:PDF>

²⁷ European Qualifications Framework <https://ec.europa.eu/ploteus/content/descriptors-page>

5. Monitoring of training centres

The competent authorities in every EU Member State should aim to increase the quality of the training and teaching which is delivered and introduce a system of monitoring of the training centres. This authority should undertake checks using a risk-based control process having set up common criteria for their approval. The authority should also set up a register of professional driver trainers linked to the training centres. Finally, there should also be scope for feedback to the competent authority from the participants in the training courses themselves. This feedback should be on both the content of the courses as well as the training standards at the centres.

6. Quality assurance for trainers and quality labelling

Professional driver trainers should follow proper initial qualifications and continuous training themselves covering different aspects, which need to be covered ranging from topics such as risk perception but also practical aspects of driving. ETSC would support the introduction of a certification scheme linked to national accreditation schemes for training covered by the authority monitoring the training centres, international management quality standards such as ISO 9001 or an EU quality labelling scheme. The certificate validity should be time limited and renewal made dependent on participation in periodic seminars so that trainers are up to date with the latest developments. The *Advanced* project came up with the principles of a labelling scheme and the setting up of an EU scheme.²⁸

Recommendations

- Include a reference to the European Qualifications Framework.
- Introduce a new system of monitoring of the training centres including a register for the trainers.
- Introduce initial and continuous training for the driver trainers linked to a quality certification scheme.

²⁸ Advanced Project, 2002 <http://www.cieca.eu/project/26>

7. Exemptions

All professional drivers should follow specific driver training because of the greater risks they face and associated responsibility they hold. The EC proposal suggests modifying the existing exemptions to make them clearer and coherent with those under Regulation 561/2006 and is explained in their new proposal. ETSC would support ending all of the exemptions that currently exist in the Directive under Article 2.

8. Enlarging the scope to include van drivers

ETSC advocates the extension of driver training under the CPC to van drivers²⁹, the syllabi would have to be reviewed to reflect vans.³⁰ Nearly 4,000 deaths occurred in Europe in 2012 in collisions involving vans^{31,32}. A large proportion of those killed were van occupants – 30% for vans compared with 12% for HGVs – reflecting in part the lower weight of the van, which makes their occupants more vulnerable. It is also worth noting that more vulnerable road users are killed in collisions involving vans, compared to the corresponding share in collisions involving HGVs: 19% of deaths in van collisions were pedestrians, compared with 14% of deaths in HGV collisions³³.

Very often employees have to drive vans on a daily basis, spending as much as half of their working time on the road. Usually these employees do not receive any special training and can get behind the wheel of a van if they hold a valid B driving licence.

9. Minimum age

The EC proposes to update and align the CPC Directive with Directive 2006/126/EC with a clear reference to when and under which conditions the lower minimum ages provided under Directive 2003/59/EC can apply. ETSC would support maintaining the current

²⁹ According to the EU definition, vans are N1 category vehicles with a loading capacity of more than 500 kilograms and a gross vehicle weight under 3.5 tons. European Commission, 2010, Light Goods Vehicles in the Road Transport Market of the European Union.

³⁰ ETSC, 2012, Fit for Road Safety: From Risk Assessment to Training and ETSC 2014, Managing the Road Risk of Van Fleets.

³¹ ETSC, 2013, 7th Annual Road Safety Performance Index (PIN) Report.

³² Good vehicles with a maximum permitted mass below 3.5 tons.

³³ Ibid.

minimum age for professional drivers set in the 2003/59/EC Directive.

10. Link to Directive 89/391 on employer risk assessment

In accordance with Framework Directive 89/391/EEC³⁴, employers shall, taking into account the nature of the activities of the enterprise and/or establishment, evaluate the risks to the safety and health of workers. Alongside the required training of bus and HGV drivers, there is a requirement for compulsory training on safety and health issues under Article 12 of Framework Directive 89/391/EEC. A link should be made between these two pieces of legislation.

ETSC Recommendations

- End all exemptions that currently exist in the Directive under Article 2.
- Extend the scope of the Directive under Article 1 to cover van drivers.
- Maintain the current minimum age for drivers.
- Insert a link to the 89/391 Directive on Risk Assessment, to stress, that risk assessment should be the basis for driver training and development.

Further reading

- ETSC 2016, Annual Road Safety Performance Index (PIN) Report
- ETSC 2012, Fit for Road Safety: From Risk Assessment to Training, PRAISE Report
- ETSC 2014, Managing the Road Risk of Van Fleets, PRAISE Report

³⁴ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31989L0391:EN:HTML>

FOR FURTHER INFORMATION

Ellen Townsend, Policy Director
ellen.townsend@etsc.eu
+32 2 230 41 06

European Transport Safety Council
20 Avenue des Celtes
B-1040 Brussels
Tel: +32 2 230 4106
information@etsc.eu
www.etsc.eu
Follow us on twitter: [@etsc_eu](https://twitter.com/etsc_eu)

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