

## **ETF views on the ex-post evaluation of Directive 2006/126/EC**

(complementing the ETF's reply to the European Commission open public consultation)

The European Transport Workers' Federation (ETF) represents more than 5 million transport workers from more than 200 transport unions and 41 European countries in all transport sectors and is a recognised social partner in seven sectoral social dialogue committees, including the one for road transport.

The ETF welcomes the initiative of DG MOVE to perform an ex-post evaluation of Directive 2006/126/EC on driving licences. To this end, the ETF and its member organisations are ready to participate constructively in the process.

### **1. Minimum age of professional drivers (categories C and D)**

The ETF does not believe that decreasing the minimum age for professional drivers to obtain a driving licence is a way to mitigate the shortage of drivers in the road transport sector.

Irregular work schedules, inadequate rest, long periods away from home, and poor levels of pay fail to meet the expectations of the young job seekers. To make the road transport sector more attractive to young people, the sector needs to become socially sustainable. This entails equal access to decent living and working conditions, to legal pay and benefits for all professional truck, bus and coach drivers. Until these problems are solved, the ETF is not in favour of lowering the minimum age.

Moreover, there is a risk that lowering the age may result in more road traffic accidents. Research has shown that young novice drivers have a much higher risk of being involved in accidents compared with older and more experienced drivers. Reasons are, amongst others, that driving is more demanding for young drivers as they need to pay more attention to their driving task, they are more prone to fatigue as their sleep patterns are different and they are also unfamiliar with the impact that fatigue has on their driving quality and lastly, they are more easily distracted. Several studies have shown that young drivers were more likely to be involved in fall-asleep accidents. They not only pose a risk for themselves but also to their passengers and other road users.

The ETF has recently published the [preliminary results](#) of an online survey of truck, bus, and coach drivers which uncovered their direct experiences of fatigue, their views on the causes of fatigue, its consequences, and the most effective countermeasures. The findings show that the drivers' poor employment and working conditions are the main cause of fatigue in commercial road transport. Fatigue leads to a deterioration of driving performance due to a narrowing of the perceptual field, slower reaction time, reduction in attention levels, and diminished steering performance. The result is a loss of control over the vehicle, which usually leads to an accident.

### **2. Medical examinations for professional drivers**

#### **2.1. Harmonisation of the rules to obtain a medical certificate**

The Directive states that the Member States may impose medical examinations as a guarantee of compliance with the minimum standards of physical and mental fitness for driving. However, annex III of the directive provides only a set of minimum standards and Member States may set stricter standards.

To ensure a level playing field amongst professional drivers from different EU member states, the rules to obtain a medical certificate should be harmonised. Moreover, the same harmonised rules should apply to the medical certificates of third-country drivers.

## **2.2. Frequency of medical examinations**

The Directive states that a medical examination to renew a driving licence must take place every 5 years. However, this is not fit for older drivers (over 65 years of age). To ensure the medical fitness of older persons to drive, it could be envisaged that from a certain age, drivers have their medical examinations more regular, e.g., every 2 years.

## **3. Driving licences issued by third countries**

At the end of 2019, there were more than 200,000 accredited third-country nationals driving commercial vehicles in the EU. To restore a level playing field, there should be a provision to ensure that these drivers had the same level of driver training and have fulfilled the same requirements for obtaining the driving licence for commercial vehicles as EU drivers.

## **4. Synergies with Directive (EU) 2018/645 on the training of drivers**

To reduce administrative burden and to save costs, it could be envisaged that professional drivers can apply and renew their driving licence and their Driver Certificate of Professional Competence (CPC) at the same time.

Moreover, it would be recommendable to

- update the directive to ensure that all new drivers are trained in using the new technologies as well as semi and fully automated driving;
- develop minimum standards for driver training and traffic safety education.

## **5. Extension of the rules to light goods vehicles (category B1)**

In the past years, there has been a shift from the use of heavy goods vehicles to light goods vehicles (LGV). LGV over 2,5t, engaged in international transport operations or cabotage operations, will be included in the scope of Regulation (EU) 2020/1054 on driving and rest time rules as of 1 July 2026. LGVs will also be equipped with a digital tachograph. To ensure the consistency of rules applicable to professional drivers, the ETF considers that the rules valid to vehicles of the categories C1, C, C1E, CE, D1, D, D1E, and DE should be extended to vehicles of category B1. This is of particular importance in terms of ensuring road safety and the medical fitness of professional LGV drivers.

This should also entail that the current professional driver training requirements get extended to all professional LGV drivers.