

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

European Cyclists' Federation

Ceri Wooldsgrove, Policy Officer c.wooldsgrove@ecf.com

22/04/2017



ECF gratefully acknowledges financial support from the European Commission.

The information and views set out in this document are those of the author(s) and do not necessarily reflect the official opinion of the European Union. Neither the European Union institutions and bodies nor any person acting on their behalf may be held responsible for the use which may be made of the information contained therein.

The Directive

The Driver CPC Certificate of Professional Competence is a qualification for professional drivers of professional bus, coach and lorry drivers introduced at the level of the EU as a cross border qualification to be held and maintained in addition to a vocational driving licence. Any drivers of lorries over 3.5 tonnes and minibuses with 9 seats or more must usually obtain a Driver CPC. New drivers obtain their Driver CPC by passing a series of initial qualification tests - theory and practical. This must then be followed by 35 hours of periodic training every 5 years if they want to keep their Driver CPC after that period. Within the Directive is an Annex that states;

“The knowledge to be taken into account by Member States when establishing the driver's initial qualification and periodic training must include at least the subjects in this list.”

The problem

In 2014 across the EU 3,863 people were killed in crashes with Heavy Goods Vehicles (HGVs) and 751 in crashes with buses. Around 22% of cycling fatalities are as a result of collisions with a large vehicle¹, with wide variations across the EU. This figure is 43% in Belgium, 38% in the Netherlands, 33% in the UK and 33% in Denmark. In some cities like London for example large lorry crashes are the cause of more than 50% of cycling fatalities. It is very difficult to pinpoint what is the cause of bicycle/lorry fatal crashes, vehicle, infrastructure, or driver/rider error, and the real cause will often have multiple causes. Driver behaviour should be seen in the context of a system which also involves the vehicle and the infrastructure. With regards to road safety of larger vehicles the EU has two major competences, the first is with the vehicle and European Type Approval², the other is with the Directive

¹ ETSC, Pedalling towards Safety, 2012 http://www.etsc.eu/documents/BIKE_PAL_Safety_Ranking.pdf

² And the General Safety Regulations will be updated next year for more info on this see ECF position paper https://ecf.com/sites/ecf.com/files/ECF%20Position%20Paper%20on%20GSR%20and%20Ped%20Protection%20Regs_November%202016.pdf



2003/59/EC³ on the Initial Qualification and Periodic Training of Drivers of Certain Road Vehicles for the Carriage of Goods or Passengers.

Road safety within the Directive

Within the Annex of the Directive is a list of the subjects that must be included when establishing the driver's initial qualification and periodic training. Though flexibility in the syllabus is needed the current requirements laid out are so flexible that drivers can achieve CPC qualification without undergoing any real 'specific emphasis on road safety and the rationalisation of fuel consumption' as mentioned in the Directive. The syllabus should be tightened to ensure this obligation is fully satisfied, and this should include some road safety specific measures.

ECF would like to see the interactions between large vehicles and cyclists and pedestrians as being included within the Annex 1 of minimum qualification and training requirements. As mentioned above cyclists crashes with large vehicles are particularly serious this should be recognised within the Directive with a specific inclusion within the Annex 1.

Some CPC regulating authorities' modules that contain cycling friendly elements have seen a reduction in cycling fatalities. Transport for London for example claim that cycling fatalities in collision with an HGV has fallen from 69% in 2009 to 39% in 2012 after the introduction of their Safe Urban Driving Module. This points to a positive outcome of including VRU/cyclist/pedestrian themed subjects which could be included in the annex of syllabus subjects.

Distraction and stress

The freight and passenger transport industry is becoming more technologically advanced with a great deal more technology inside cabs that has been replacing paper for a while. Smartphones as well as the technology that is so often a part of a growing technologically advanced logistics, freight transport industry is now ubiquitous in cabs, which can have a detrimental effect on driving safety^{4, 5}. Logistics and road freight drivers are under increasingly stressful situations with deadlines, busy traffic, administration and increased complexity the EU supply chain⁶. This is often undertaken with long irregular hours of work often away from home.

Ideally stress and distraction should be removed from the cab as much as possible, we believe that the current demands placed on drivers to meet deadlines particularly within the logistics/freight industry is unhealthy for drivers and consequently puts those outside the vehicle at risk as well. This is a situation that needs to be dealt with beyond the remit of this Directive, however within the remit of this Directive stress and distraction should be treated as a topic within the syllabus. More specifically this includes how to deal with aggressive attitudes to driving larger vehicles.

³ <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32003L0059>

⁴ 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

⁵ 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.

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

⁶ 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>



ECF Recommendations

- ECF supports the European Commission's proposal to ensure that training includes a specific road safety subject, and that the subjects are not repeated within the same training period.
- The training should be up to date within the contemporary technological and legislative environment
- It is essential that drivers are aware of the needs and movements of other road users, particularly those found in urban areas. Awareness of other road users, in particular cyclists and pedestrians, should be a part of the syllabus under Annex 1
- We would also recommend that the risks from distraction is also included within Annex 1. This includes distraction from smartphones as well as the technology that is so often a part of a growing technologically advanced logistics, freight transport industry
- We would recommend that dealing with the stressful work situations that many drivers find themselves under should be included in the Annex 1. This includes dealing with aggressive attitudes to driving.

