

ECF Position Paper on Revision of the Driving Licence Directive

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Bicycle safety is intimately bound up in its interactions with motorised transport and of course the drivers of those vehicles. 83% of cyclist fatalities (99% of pedestrian fatalities) occur in crashes with motorised vehicles. This is not to apportion blame solely to drivers, but ECF believe that those road users that are in control of larger, heavy, and powerful vehicles in the L and M, and N categories should have the best possible education and training in order to prevent as many crashes and collisions as possible, to ensure better safety for all. In urban areas where people, walk, cycle, work, and play the car is a guest, and driving that vehicle in those areas must reflect the subordinate nature of its presence.

With the current focus of public authorities on increasing cycling and pedestrian numbers across the EU, it is important that drivers are aware of and understand the needs of these road users, and that they are trained to use their vehicles responsibly. Additionally given the over-representation of young/novice drivers in crash data, it is important that there is a focus on these drivers in order to learn how to share the road with other users.

An increase in cyclist and pedestrian numbers and their continued promotion by public authorities, is not the only major change occurring on European roads. The vehicle themselves are also radically different from a decade ago. Advanced Driver Assistance Systems (ADAS) are present in almost all new cars, and in fact many of these systems and devices are now mandatory under changes to the European Type Approval testing procedures. It is important that drivers are aware of recent technological vehicle developments in order to interact safely on the roads, and also to know how to use (and *to* use) these devices.

A general European development is the expansive cross border movement amongst EU citizens which would also require the also requires further integration of the education, training, and testing of driving across the EU. European citizens are also aging and living longer, and though drivers often become safer as they age, ECF recommends the lifelong learning model that provides continued monitoring and training of people throughout their lives to make sure they are up to date.

Training of examiners, trainers, and instructors

1. Common minimum requirements for training and standards for professional instructors

Currently there are harmonised minimum standards for driving examiners, with some requirements. It would make sense that this should also be applied to driver trainers. These minimum standards should include those of the driving examiners within the current Annex IV.

However, we would also recommend:

- Distraction while driving
- New vehicle technologies and changes in the road transport system
- Specific requirements on interactions with cyclists. We would recommend that examiners and trainers spend some time on a bicycle or walking in busy areas to understand and empathise with other road users. Also, to appreciate other road users not as cyclists, pedestrians, or car drivers but as human beings using a bike, walking, or using a car, to prevent objectifying the person and for greater care to be taken in interactions.
- General content should be introduced such as basic notions of sustainable mobility and costs and benefits of different modes of transport for society and the environment.

Periodic training should be required of examiners and instructors in order to take on the complex nature and changing transport environment.

- Provide common minimum requirements for instructors and examiners including standards on interactions with cyclists and pedestrians
- Examiners and instructors should have periodic training

Testing and Training of Drivers

1. Minimum requirements for probation periods and a Graduated Licensing System

There is strong research globally that shows that a Graduated Driving Licence System can be an effective method of reducing crash risk for novice drivers¹. The idea is to gradually expose usually young people and novice drivers to risk as they attain the competencies to manage that risk. The EU funded H2020 Safety Cube project² rated it a “Green light” status, meaning it was an effective safety measure³. A UK study showed that around 1 in 5 young drivers reported having a collision within the first 6 months of passing their test⁴. SWOV also found that it is after passing a test that the risk of having a crash/collision is at its highest⁵.

A Graduated Licensing system should be the default across the EU, its safety merits is not in question, and can have a major impact on reducing collisions with cyclists and pedestrians, making road safer for all road users. ETSC PIN Report “Reducing Road Deaths Among Young People Aged 15 to 30” outlines the many forms they can take and the various possibilities that Member States have taken up. We would

¹ <https://www.cochranelibrary.com/cdsr/doi/10.1002/14651858.CD003300.pub3/abstract>

² <https://www.roadsafety-dss.eu/#/>

³ <https://www.roadsafety->

[dss.eu/assets/data/pdf/synopses/Driver_training_and_Licensing_formal_prelicense_training_graduated_driver_licensing_and_probation_13062017.pdf](https://www.roadsafety-dss.eu/assets/data/pdf/synopses/Driver_training_and_Licensing_formal_prelicense_training_graduated_driver_licensing_and_probation_13062017.pdf)

⁴ <https://www.broughtonschoolofmotoring.com/wp-content/uploads/cohrtiimainreport.pdf> in https://etsc.eu/wp-content/uploads/PIN-Flash-41_web_FINAL.pdf

⁵ <https://swov.nl/nl/publicatie/hersenontwikkeling-en-ongevalsrisico-van-jonge-bestuurders>

recommend that a GLS becomes a requirement with technical guidelines to aid Member States in its implementation.

The European Commission should consider whether intensive courses can be seen as a safe way of training drivers. Intensive driving course have been shown to have a negative effect on road safety by increasing the crash involvement and the risk of traffic offense on those that have used this training method⁶.

- The Commission should seek to require Member States to implement a Graduated Driving Licence system including probationary periods for new drivers.
- Intensive driving courses should be reviewed possibly with requirements attached to them.

2. Specific requirements for interactions with cyclists

Interactions with cyclists, pedestrians, and micromobility vehicles should be included within the content requirements of training and testing. The vast majority of cyclist and pedestrian fatalities are in crashes with motor vehicles, and these vehicles will increase in the future given that public authorities are promoting the use of all of these sustainable modes, exposure to cyclists and micromobility devices is increasing and is set to increase into the future. This means increased exposure between these modes and motorised vehicles. For cyclists, specific provisions could include:

- The classic right hook crash⁷ (left hook in Cyprus, Ireland, and Malta), where a vehicle turns right onto a passing cyclist.
- Connected to this are the blind spot issues, particularly with larger vehicles to the side for cyclists and to the front over the front of the bonnet for pedestrians.
- The danger of passing manoeuvres on cyclists and the subjective experience of being passed at high speed without necessary distance.
- Checking behind the vehicle when opening the door to avoid hitting passing cyclists ('dooring' incidents).
- General content should be introduced such as learning to view other road users not as cyclists, pedestrians, or car drivers but as human beings using a bike, walking, or using a car. To prevent objectifying the person and for greater care to be taken in interactions. This could also include basic notions of sustainable mobility and costs and benefits of different modes of transport for society and the environment.

We would also highly recommend that Member States provide cycle training, coaching, and promotion for all ages. Research has shown that motorists who are cyclists are likely to have fewer crashes with cyclists and are better at interacting with them, and that cycling experience is correlated with a better detection of cyclists when driving⁸. Increased cycling levels has also shown to bring calmer streets and is an excellent indicator of safer roads for all⁹.

⁶ https://www.roadsafety-dss.eu/assets/data/pdf/synopses/Driver_training_and_Licensing_formal_prelicense_training_graduated_driver_licensing_and_probation_13062017.pdf

⁷ A car passes a cyclist to the left of the cyclist and then makes a right turn in front of the cyclist. The cyclist is then either hit by the car or cannot avoid hitting the car. This type of accident occurs not only when a car is turning onto a road, but also into parking lots and driveways. This is specifically laid out in the Vienna convention on road traffic, although there are other scenarios that are encapsulated in this article "Article 16.2 - While changing direction, the driver shall, without prejudice to the provisions of Article 21 of this Convention regarding pedestrians, allow road users to pass on the carriageway, or on other parts of the same road he is preparing to leave"

⁸ www.sciencedirect.com/science/article/abs/pii/S000145751730249X and <https://www.sciencedirect.com/science/article/abs/pii/S0001457517301343#>

⁹ <https://epjdatascience.springeropen.com/articles/10.1140/epjds/s13688-022-00339-5>

There has been a large amount of cycling infrastructure development since the climate crisis and, more recently, the Covid crisis. There is a variation between many of the cycling infrastructures being used throughout the EU, there is no harmonised standard or technical requirements. There are many forms of lanes, and tracks but also cycle streets, contraflow cycling, advanced stop lines, exceptions from traffic light etc. It would make sense to update drivers on the various types of infrastructure found throughout the region to familiarise drivers with signs used in other countries, so there is no confusion when they see a cyclist riding in the middle of a lane, “riding against traffic” or “running a red light” when they have the right to do so¹⁰

Most EU Member States have signed the UNECE’s Convention on Road Traffic¹¹ and thereby committed to provide road safety education in schools at all levels. However, this commitment is only currently fulfilled by Czech Republic, Ireland and Germany, renewal of the Directive can be a good opportunity to remind Member States of this commitment. Member States should be reminded of this commitment within the recitals of the Directive.

- Include interactions with cyclists (and pedestrians) within the training and testing requirements.
- European Commission to Recommend Member States to provide cycle training for all ages, but particularly for children at school in order to conform to UNECE’s Convention on Road Traffic. For text in Driving licence directive recitals.

3. Distracted driving

A downside of the many new technologies in vehicles is the increase in distracted driving. These systems, along with infotainment systems, and the rise in the use of handheld devices can be a major obstacle for safe road use. Distracted driving should play an important role in driver education.

- In Czechia 36% of drivers now admit to using their phone every time they get behind the wheel¹²
- In Spain and Ireland around 25% of drivers now admit to using their phone while driving¹³
- A review for the European Commission estimated that driver distraction is likely to be a factor in 10 to 30% of all road crashes in Europe each year¹⁴. In one study of truck drivers, a much higher estimate of 70% was found¹⁵
- A SWOV report from 2019 showed that 8.2% of Dutch drivers admitted to playing games while driving and 70% of drivers admitted to using their phone in some way while driving
- Distracted Driving accounted for around 10% of all motor vehicle fatalities in the US¹⁶
- and in France¹⁷.

¹⁰ For example, the right turn on red allowance in many EU countries.

¹¹ <https://unece.org/road-traffic-and-road-signs-and-signals-agreements-and-conventions> “Contracting Parties will take the necessary measures to ensure that road safety education be provided on a systematic and continuous basis, particularly in schools at all levels.”

¹² <https://zpravy.aktualne.cz/ekonomika/auto/telefonovani-posilani-sms-a-sledovani-socialnich-siti-prizna/r~1e2f2a9a917d11e7a3060025900fea04/?redirected=1511869921>

¹³ <http://www.heraldo.es/noticias/nacional/2017/07/27/el-los-espanoles-usa-telefono-volante-segun-direct-seguos-1189027-305.html> and <http://www.independent.ie/irish-news/news/haveyoursay-do-you-use-your-phone-while-driving-35964455.html>

¹⁴ https://iamwebsite.blob.core.windows.net/media/docs/default-source/default-document-library/iam-roadsmart-trl-simulator-study_infotainment.pdf?sfvrsn=d873495c_2

¹⁵ https://ec.europa.eu/transport/road_safety/sites/roadsafety/files/pdf/ersosynthesis2018-driverdistraction-summary.pdf

¹⁶ <http://www-nrd.nhtsa.dot.gov/Pubs/812197.pdf>

¹⁷ <https://www.franceinter.fr/societe/securite-routiere-5-bonnes-raisons-de-ne-pas-toucher-a-son-telephone-au-volant>

- Irelands RSA estimate that around distraction accounts for around 20-30% of crashes¹⁸

Drivers text messaging behind the wheel are eight times as likely to be in a crash or near crash as drivers who are not texting. Impairments to driving activity that can suppress brain activity, such as in-car systems and mobile phones, increase reaction time, decrease visual scanning of the driving environment, and result in missed driving cues such as missing stop signs or running red lights all of which can have serious impacts on cycling safety¹⁹. A TRL report from the UK showed that in-vehicle infotainment systems that display smartphone apps on in-car displays impair reaction times behind the wheel more than alcohol and cannabis use²⁰

- Distracted Driving should be an integral part of driving training, testing and hazard perception.

4. Hazard perception test

Research from Safety Cube has shown that hazard perception training significantly enhances the ability of car drivers to detect risk/danger and behave in a safer way than untrained road users. Hazard perception training reduced the risk of collisions as well as driving speed²¹. We would recommend hazard perception testing to include interactions with cyclists and pedestrians.

Most of the studies looked at simulators and on-road testing as a way to improve hazard perception, these would be the best way (in a safe environment and process) to instil this important skill.

- Hazard perception test should be an integral part of driving training and testing

5. Advanced Driving technologies

It is important that authorities require skills and knowledge training in new safety technologies. These are technologies that can have a high impact in reducing fatalities and serious injuries. Autonomous Emergency Braking, Intelligent Speed Assistance, blind spot information systems, etc. all can have a real impact on safety improvements, including, the first time, for those outside the vehicle. It is important that drivers know how they are used and their limits, it will be the driver who is always responsible for the vehicle.

It is also important that drivers are aware of the potential safety benefits of these systems. Though many safety ADAS will soon be mandatory in all new vehicles, they can also be turned off, or will not be activated at start up. Drivers new to the technology should be made aware why it is important that systems should be used and be switched on. This means encouraging the habit of using these technologies across the vehicle fleet. The European Commission needs to maintain a solid and thought through interaction between vehicle type approval, UNECE regulations, and driving licence directive. This would show real joined-up thinking between vehicle regulations and driver behaviour regulations.

- Knowledge of uses, risks, and benefits of Advanced Driving Systems should be an integral part of driving training and testing

¹⁸ <http://www.thejournal.ie/mobile-phone-use-driving-3526565-Aug2017/>

¹⁹ <https://www.aaafoundation.org/sites/default/files/MeasuringCognitiveDistractions.pdf>

²⁰ <http://www.iamroadsmart.com/infotainment>

²¹ https://www.roadsafety-dss.eu/assets/data/pdf/synopses/Education_Hazard_perception_training_05092017.pdf

Changing vehicle categories and age requirements

1. A new category for micro-mobility users or inclusion in the AM category

EPACs are currently excluded from the Driving licence directive, and we believe that this should be maintained, EPACs should not be included within the remit of the Driving licence Directive. If a 'micromobility' category were to be included in the Directive EPACs should not be included.

The following facts are supplied to support the supposition that EPACs should not be treated as a driven motorised vehicle and should not be included within the Driving Licence directive:

- The maximum speed is 25 km/h before the motor cuts out, this is the speed of a well-trained, fit cyclist. However, the average speed of a EPAC over the whole journey is only around 1-3 km/h higher than an average bicycle²²
- The maximum continuous power output is 250 Watt, also corresponding to the power output of a well-trained, fit cyclist. It gives a boost up hills and into winds but does not provide for higher speeds than 25 km/h on the flat.
- An EPAC is designed to also be ridden without the motor assistance, meaning that when the motor is off, or the battery is drained, it can still be used like a conventional mechanical bicycle.
- Their technical regulations come through the bicycle working group TC333 in the standardisation bodies CEN and has produced the standard EN 15194 not through motor vehicle Type Approval²³.
- EPACs are not considered motor vehicles within the context of EU Type Approval for Two- and Three-Wheel Motor Vehicles²⁴.
- EPACs are not considered motor vehicles within the context of the current EU Driving License Directive 2006/126/EC²⁵.
- All EU Member States treat EPACs as bicycles with regards to use on the roads, they can use cycle infrastructure, they do not require mandatory helmet use (unless the bicycle requires it), they do not require license, compulsory insurance, nor number plate.
- The recently amended Motor Insurance Directive²⁶ explicitly excludes EPACs by defining a motor vehicle as that which is 'exclusively' propelled by mechanical power.

We do not believe that EPACs provide a major risk to other road users, certainly not enough of a risk to require a specific driving licence. In Germany in 2016 there were zero pedestrian fatalities in crashes with EPACs, to put this in perspective there were 483 pedestrian fatalities and 7,163 pedestrian serious injuries in crashes with motorised vehicles. Across Europe around 83% of cycling fatalities happen in a crash with a motorised vehicle, 99% of pedestrian fatalities happen in a crash with a motorised vehicle²⁷. This is why we require motorised vehicle drivers to require a driving licence of some kind.

²² <https://www.itf-oecd.org/safety-e-bikes-netherlands>

²³ https://standards.cen.eu/dyn/www/f?p=204:32:0:::FSP_ORG_ID,FSP_LANG_ID:6314,25&cs=15471628D918031F2386C2FFB70BED679

²⁴ <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013R0168>

²⁵ "A 'power-driven vehicle' means any self-propelled vehicle running on a road under its own power, other than a rail-borne vehicle." (Italics added) This therefore exclude all EPACs that are not self-propelled under its own power, they are assisted <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006L0126&from=EN>

²⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021L2118&qid=1652351822237>

²⁷ <https://etsc.eu/how-safe-is-walking-and-cycling-in-europe-pin-flash-38/>

Requiring a licence of EPACs riders would undermine the growth of the EPAC as an alternative to motorised middle- and long-distance journeys. It is difficult to provide evidence for this simply because countries around the world have not deemed it necessary to apply a licence requirement on their EPAC riders. However, in Malta ECF members BAG conducted a bicycle count survey²⁸ and compared data from 2012 to 2015, when public authorities there introduced more stringent regulations for the use of EPACs on the island, this included registration and compulsory insurance, EPAC use fell year on year (84% the first year and then 15% in 2015) even while bicycle use grew. Two years ago, Northern Ireland saw suspension of sales of EPACs²⁹ due to a legal oversight that provided a strict regulation of EPACs; this has since been overturned and the market has resumed.

- We recommend that EPACs are explicitly excluded from the Driving Licence Directive.

2. Training for drivers of light goods vehicles

Light Goods Vehicles/Vans are becoming more and more of a road safety issue. Sales have increased by 35% between 2010 and 2018³⁰, and around 2630 people were killed in crashes involving vans and Light goods vehicles in the EU in 2018, around 11% of all road deaths. Around 40% of these are cyclists and pedestrians.

Van/light goods vehicle, use in Europe is on the rise due to increased demand for home deliveries, and other last mile delivery. Bicycle and pedestrian use are also on the rise with environmental, health, and energy security demands so this exposure is only going to increase. This means exposure of cyclists and pedestrians to vans is set to increase.

Professional use for light goods vehicles are also more than about driving a vehicle. There is often an extra element of stress involved with tight deadlines, targets and goals to be achieved often directly linked to pay. Light goods vehicles over 2.5 tonnes and working cross border will also be subject to new EU rules for driving and rest times which will also include the use of tachographs³¹. The safety requirements for vans and light Goods vehicles resemble more and more those of the larger trucks. Therefore it would make sense that the same requirements apply to Light Goods Vehicle use. We would recommend that the requirements for truck drivers (CPC, and medical screening) should be extended to these drivers as well.

- Group 1 drivers that are also professional drivers to be subject to the provisions required for Group 2 drivers (CPC, and medical screening)

3. Increasing the maximum weight of B-category from 3.5 to 4.25 t

This would be very concerning. There is good evidence from the US that larger and more powerful vehicles are beginning to have a very detrimental impact on road safety particularly for pedestrians, and we have seen how larger vans are also becoming a problem. Allowing young and novice drivers, the riskiest section of society in a vehicle, to be allowed to drive larger vehicles that are among the riskiest of vehicles would not be in the interests of road safety. There is no road safety argument for this policy measure, and if this measure were to be implemented it would not be in the interest of road safety³².

²⁸ Documents available on request c.woolsgrove@ecf.com

²⁹ <http://www.belfasttelegraph.co.uk/news/northern-ireland/halfords-suspends-sale-of-ebikes-in-northern-ireland-due-to-confusing-legislation-36011569.html>

³⁰ ACEA

³¹ <https://eur-lex.europa.eu/eli/reg/2020/1054/oj>

³² <https://www.iihs.org/news/detail/new-study-suggests-todays-suvs-are-more-lethal-to-pedestrians-than-cars>

Currently a novice driver can get behind the wheel of a vehicle up to 3500 kgs. This is a very large vehicle and very different to other smaller vehicles. Moving that to 4.25 tonnes could be problematic. The increase in weight measure is understood as a way for users of large vans to continue using these vehicles when alternative fuel sources are used, which may breach the 3.5 t weight limit.

However, there are major issues with promoting and facilitating the use of large vehicles, either for personal or professional use. There are major issues concerning pollution³³, safety³⁴, and congestion³⁵ that is becoming much more prevalent due to larger vehicles.

As the automobile industry is always reminding us battery weights are always decreasing, and we should not have the knee-jerk reaction of changing the legislation for what is still a changing environment. We could even argue that maintaining the weight limit of 3.5 tonnes would act as an incentive to the automobile industry to improve batteries and reduce the weight and size of their vehicles.

- Maintain the B-category weight limit at 3.5 tonnes

4. Minimum age limits for licences

We would be against lowering of age for any of the licence categories, the driving licence directive should not allow any reduction in ages nor derogation at the national level. There is good evidence that the risk of crash is twice as high for 16-17 year old drivers as it is for 18–19-year-old drivers³⁶. In Finland, after a loosening of the age limits, it was found that 17-year-olds accounted for about 8 percent of all road infractions, even though 17-year-olds account for 0.3 percent of driving license holders. Allowing younger drivers access to fully sized vehicles is the wrong direction that we should be taking for safer roads across the EU.

With regards to professional drivers, young truck drivers also show a higher degree of risk³⁷, there is also a high risk of crashes in interactions between cyclists and larger vehicles, and a higher risk of the crash being serious. Reducing the age of large vehicle drivers is not a sustainable solution to solving the problem of the lack of professional drivers wishing to enter the profession. We would recommend improving the poor conditions in the sector to entice people into the profession³⁸.

- Age limits for any category should not be reduced for neither private nor professional drivers.

www.europarl.europa.eu/cmsdata/99134/1_Presentation%20Richard%20Cuerden_The%20impact%20of%20higher%20or%20lower%20weight%20cars%20on%20road%20safety.pdf and

<https://research4committees.blog/2015/11/16/the-impact-of-higher-or-lower-weight-and-volume-of-cars-on-road-safety-particularly-for-vulnerable-users/> and

<https://eu.freep.com/story/money/cars/2018/06/28/suvs-killing-americas-pedestrians/646139002/>

³³ <https://www.emissionsanalytics.com/news/pollution-tyre-wear-worse-exhaust-emissions> and

<https://www.iea.org/commentaries/global-suv-sales-set-another-record-in-2021-setting-back-efforts-to-reduce-emissions>

³⁴ <https://www.sciencedirect.com/science/article/abs/pii/S2212012221000241> and <https://www.vias.be/en/research/notre-publications/briefing-suv-s-en-verkeersveiligheid/> and

https://www.sciencedirect.com/science/article/abs/pii/S0001457522001051?dgcid=raven_sd_via_email and

<https://www.iihs.org/news/detail/new-study-suggests-todays-suvs-are-more-lethal-to-pedestrians-than-cars>

³⁵ https://www.researchgate.net/publication/239810476_The_External_Congestion_Costs_of_Differential_Vehicle_Sizes

³⁶ <https://aaafoundation.org/rates-motor-vehicle-crashes-injuries-deaths-relation-driver-age-united-states-2014-2015/>

³⁷ https://www.researchgate.net/publication/41450852_Age-related_safety_in_professional_heavy_vehicle_drivers_A_literature_review and

https://www.researchgate.net/publication/222963388_A_Driver_Focused_Truck_Crash_Prediction_Model

³⁸ <https://op.europa.eu/en/publication-detail/-/publication/47fd3176-26be-4170-85ea-a7f30024a842>

Fitness to Drive and Lifelong learning

1. Medical Fitness and Standardised screening procedures

We think that there should be a more thorough fitness to drive checks spanning the whole time that someone wishes to drive. There is a rise in many of the medical conditions that we see within the Annex III throughout middle age and early old age, it is important that we make sure that those who choose to drive are as safe to drive throughout at whatever stage of life they choose to do so. Research from Finland found that 16% of fatal crashes could be attributed to some form of driver illness.

Alcohol and substance abuse, as well as neurodevelopment illnesses should be updated within Annex III, as these are also very important road safety indicators³⁹. There should be a standardised set of procedures for screening medical fitness across the EU, to help medical professionals, especially GPs, to detect medical/fitness to drive issues. The requirements for drivers to report illness affecting fitness to drive is implemented in very varying fashions across the EU, this 'requirement' should be a clear obligation, drivers that do not report their condition are a danger to all other road user as well as to themselves. As should the mandatory obligation for doctors to report drivers with certain medical conditions that could affect driving to licencing authorities, this is not a requirement of the current Directive, but some Member States do mandate it. General practitioners should also be supported and given guidance on how to suggest alternative forms of transport that may be more conducive to health, such as cycling, walking, and public transport.

Medical checks at licence renewal could be an important and useful way of identifying medical conditions affecting fitness to drive. Many EU countries require this and many of them go beyond those required in the directive⁴⁰, the annex on physical and mental fitness should be updated to reflect the best in class of medical screening. The varied implementation of the Directive across the EU is further accentuated when dealing with Class 2 and professional drivers. Here there can be an impact on the cross-border movement of workers, with some workers having advantages in countries with lower levels of implementation than those of higher implementation

- We would support a screening protocol for assessing medical fitness to drive in order to increase consistency in assessing medical fitness to drive across the EU. Including reviewing alcohol, substance abuse and neurodevelopment issues, and for GPs to be provided with better support.
- We would also support medical checks at licence renewal

2. Testing elderly drivers

There is good evidence against mandating checks just for elderly people as a relevant safety measure and we also understand the issue of discrimination against someone because of their age. We would therefore agree that the focus should be on functional requirement to driver rather than an age-related requirement. We should also recognise that elderly people with a lifetime of understanding consequences to behaviour may also make them safer drivers. Being older they may also have had more experience of using other forms of mobility such as cycling and walking, and to be able to empathise. We would therefore agree that the focus should be on the functional abilities of all drivers throughout their lives and not just age.

However, it is important to note that we do take issue with the argument that if we require medical checks for elderly drivers that they may be 'forced' to turn to 'soft' modes, and therefore less safe if they fail a medical. Using a 'soft mode' means being an active transport user (walking, cycling, and Public Transport) with a very large health benefit involved, often countering many of the conditions that we find

³⁹ <https://etsc.eu/are-medical-fitness-to-drive-procedures-fit-for-purpose-pin-flash-40/>

⁴⁰ https://ec.europa.eu/transport/road_safety/statistics-and-analysis/statistics-and-analysis-archive/miscellaneous/assessing-fitness-drive_en

in Annex III of the current directive⁴¹. The health benefits always far outweigh the safety costs, particularly for elderly people, meaning that overall, this would leave to a public and personal health benefit if they were to move to walking, cycling, and PT. This becomes even easier with the advent and uptake of the Electric Power Assisted Cycles (EPACS) that provide a small boost and assistance for older knees. Of course, the health and safety benefits/risk vary from case to case but perhaps we should be a little less afraid of advising elderly people to use other modes of transport given the health benefits they provide. Therefore, we should not promote the motor vehicle as a way of improving elderly people's health, as it often exacerbates the health problems associated with a sedentary lifestyle. We recommend that the health benefits of active transport should always be in the conversation concerning continuing to drive due to medical or age-related illness.

- We would recommend that Member States set up provisions for assisting people in the transition from driving to other forms of mobility such as walking, cycling, or using public transport when driving becomes

3. Visual testing

There are many visual function measures conducted at time of licence acquisition, but a self-test/license-plate test is not good enough, there should be an official declaration of visual abilities for both licence acquisition and renewal, given that this is such an important part of safe driving.

- The current "best-in-class" procedure should be mandated across the EU, and the procedure should be carried out by an eyesight professional.

4. Alcohol and drug dependency

For issues related to alcohol we would recommend that any renewal should be conditioned to the fitment of an alcolock device. Alcohol dependency and alcohol use disorders should be re-assessed. Implementing technological solutions like alco-locks into vehicles should be considered when restoring driving licence to those with a history of alcohol dependence/. Likewise Intelligent Speed Assistance systems should be a consideration for those caught consistently speeding.

5. Lifelong learning and training

The point of licence renewal can be an excellent opportunity to keep road users up to date with changes on the roads. Whether this is through a specific training programme, test, or education, public authorities should take advantage of that particular moment in time when drivers have to come to the authorities every 10-15 years for licence renewal to use that time wisely to make sure that drivers are aware of these changes.

For example, we know Dutch drivers are much more amenable when sharing the road with cyclists, but in countries without notable cycling populations and little history of interaction, but with rising cycling numbers, licence renewal can be that moment to bring knowledge of how to interact with these increasing road users. If not compulsory for all drivers renewing their licence, then perhaps a refreshment course could come with incentives with insurance benefits to incentivise their uptake. We would however recommend that it become mandatory for anyone who has a blemish and discretion on their licence. A 'licence for life' then should not be possible within the Directive, and we should be seeking opportunities to update those who choose to drive on changes that have been occurring on the roads.

⁴¹https://www.researchgate.net/publication/324856683_Cycling_for_Transport_Among_Older_Adults_Health_Benefits_Prevalence_Determinants_Injuries_and_the_Potential_of_E-bikes and https://link.springer.com/chapter/10.1007/978-3-319-76360-6_6

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