Executive Summary

A safe road transport system requires tailored education and training interventions at every step of one’s life. Since human error is recognised as a major contributory factor to road casualties, Mobility Clubs and the FIA have put in place programmes to ensure lifelong learning for road users. Every traffic participant should be encouraged to undertake a process of continuous personal development.

FIA recommends:

- The financing and conducting of awareness campaigns for parents on proper use of Child Restraint Systems
- That traffic education in schools be made mandatory across the EU 28
- A revision of the driving licence systems to mandate a multi-phase retraining system whereby novice drivers have to undertake further training to validate their licence
- A revision of the European Directive 2003/59/EC on periodic training of professional drivers extending the minimum list of topics to improve the effectiveness of the trainings. For instance, training on higher order skills such as self-assessment and the impact of attitudes on road risk should be addressed
- A revision of the European Directive 2003/59/EC on periodic training of professional drivers to include practical training (in-vehicle, or at the very least in simulators) as a requirement
- The promotion and provision of voluntary refresher and assessment driving courses tailored to senior citizens; and the provision of mobility alternatives and information to enable seniors to remain mobile while guaranteeing their safety
The FIA welcomes the European Commission’s plan to continuously develop its strategy for road user education and training, as stated in the interim evaluation of the European road safety policy orientations 2011-2020¹.

**FIA Region I Position**

**Early life**

Parents of small children need to be informed and educated about the proper use of Child Restraint Systems (CRS). Field studies conclude that more than half of children are not correctly restrained in cars, even in countries with a high acceptance for Child Restraint Systems². Improper use very often amounts to being the same as not using a restraint system at all. For instance, the use of a CRS that is too big for the child’s size can lead to the ejection of the upper part or the whole body of a child from the CRS during a crash.

EU laws require that UNECE approved Child Restraint Systems are used when children are on board a passenger car. The new ‘i-size’ UNECE safety regulation (R 129) introduced in 2013 is applicable in the EU. Its objective is to make Child Restraint Systems easier to fit, to provide better protection from side impacts and to keep children rear-facing until 15 months. ‘i-size’ CRSs are based on the child's height rather than weight (this makes it easier for parents who tend to know a child’s height more readily than his or her weight). ‘i-size’ CRSs are only compatible with Isofix anchorage equipped car seats. This means that ‘i-size’ will run side by side with the existing standard established in the previous regulation (R 44) that remains valid. Parents also need to make sure that an ‘i-size’ seat is appropriate for their car (not all Isofix anchorage seats are compatible with all ‘i-size’ seats). Car manufacturers and CRS manufacturers have lists on their websites that show which seats are approved for which cars, and should ensure such lists are easily available.

Whether parents opt for an ‘i-size’ seat or not, they should always ensure that they are using the appropriate seat for their child’s size or weight.

<table>
<thead>
<tr>
<th>UNECE Regulation 44 (older system, but still in use/products still on the market)</th>
<th>UNECE Regulation 129 (new system)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Group 0 (rear-facing)</strong></td>
<td>CRS is chosen according to the body size (not weight). Unlike R44 there is not a single reference ‘group system’. The classification can vary across manufacturers and products: the manufacturers, however, must indicate the child size range (height), for which the various CRSs are suitable.</td>
</tr>
<tr>
<td>Under 10 Kg</td>
<td>Child must travel rear-facing until they are 15 months old.</td>
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<tr>
<td><strong>Group 0+ (rear-facing)</strong></td>
<td>The CRS is marked with this sign:</td>
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<tr>
<td>Under 13 Kg (approx. 9-15 months old)</td>
<td></td>
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<tr>
<td><strong>Group 1</strong></td>
<td></td>
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<tr>
<td>9 – 18 Kg</td>
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<td><strong>Group 2</strong></td>
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<td>15 – 25 Kg</td>
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<td><strong>Group 3</strong></td>
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<td>22 – 36 Kg</td>
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Parents should also be made aware of the need to deactivate the front passenger airbag when rear-facing CRSSs are used on the front passenger seat. Also, rear-facing does not need to end at 15 months. In Scandinavia it is common practice to keep children rear-facing until they reach four years of age. In California a bill was introduced in 2015 to make rear-facing mandatory until children reach two years of age. Because toddlers have slender and undeveloped necks as well as relatively heavy heads compared to the rest of their bodies, rear-facing positions offer better protection against head, neck and spine injuries. The FIA recommends that parents look for products that allow their toddlers to travel rear-facing for as long as they can.

Finally, the impact of parental behaviour on future safety attitudes is also a topic that has been examined in recent years. It has been demonstrated that parents who display aggressive behaviour such as shouting or driving excessively fast have a direct influence on children’s future attitudes to driving.

FIA recommendations:

- Finance and conduct awareness campaigns for parents and adults (identification of the right CRS for the child; proper use; if possible promotion of ‘i-size’ seats; ‘rear-facing’ travel as long as possible)
- Encourage on-road education campaigns (in front of schools; at supermarkets etc.) to instruct parents and adults on proper use
- Education and awareness raising on CRS use can also be done by consultations during pregnancy or as part of the process of release from hospital after childbirth
- Awareness campaigns for adults regarding the use of seatbelts, speeding and non-aggressive driving behaviour in order to set a positive reference frame for children’s future attitudes to driving are also needed
- Cars and CRS manufacturers should ensure that the lists that indicate which seats are approved for which cars are easy to find on their websites and in product manuals
- Continued research and funding for CRS product development and product testing is needed, as well as the development of improved child crash test dummies and child body modelling for virtual crash-testing
- A reduced VAT rate for CRSSs could be considered. Council Directive 2006/112/EC (the VAT Directive) makes it possible for certain products and services, such as the provision of medical care, to be exempt from or have reduced VAT when they are considered to be essential items

Children

There is great variance across the EU in terms of the provision of mandatory traffic education for children, and the way those programmes are delivered. In many countries traffic education in schools is not mandatory and its delivery depends entirely on the willingness of schools, creating a fragmented landscape even within national territories.

In the countries with mandatory traffic education, the time spent on traffic education and the numbers of modules vary greatly. On one end of the spectrum traffic education classes are conducted twice, as in Poland where children receive training at age 7 and 15. On the other end there are countries like Italy and Latvia where the topic is taught every year over 12 years.
Regardless of whether traffic education is mandatory or not, Mobility Clubs are very active in delivering programmes together with schools and traffic police. They set-up traffic obstacle courses, deliver theoretical classes or distribute educational materials. The FIA European Traffic Education Contest (ETEC)\(^3\) gathers children from across Europe to learn about road safety and compete with each other by completing various theoretical and practical exercises.

The FIA was also an active supporter of the 2015 worldwide campaign coordinated by the UN Global Road Safety Collaboration: “#SaveKidsLives”. The campaign was led by children themselves, who submitted their declaration to decision-makers at the Global High Level Conference on Road Safety in Brasilia (17-19 November 2015)\(^4\).

**FIA recommendations:**

- Traffic education programs should reach children before school enrolment, e.g. in kindergarten
- Traffic education in schools should be made mandatory across the EU 28
- A uniform minimum European curriculum that can be adapted to countries’ or schools’ specific needs could ensure high quality and continuous traffic education in schools; in particular, traffic education should be continuous throughout a child’s schooling years, not a ‘one off’ exercise
- Best practice, transnational exchange programmes on existing mandatory and voluntary traffic education schemes in Europe should be encouraged

**Learning to drive**

Novice drivers are overrepresented in traffic crashes and this remains the main cause of death among 15-24 year olds in developed countries. In Europe, the fatality rate of the 15-24 age group is up to twice as high as that of the total driver population\(^5\). In the Netherlands, it is reported that young drivers (18-24 years of age) have a crash rate that is actually five times higher than that of older and more experienced drivers (30-59 years of age)\(^6\). Age, as much as experience, is a significant factor that influences crash rates.

The majority of crashes involving young drivers are caused by the lack of higher order skills such as hazard perception and ‘calibration’ (the ability to balance the risks you take in traffic against your skills as a driver). Novice drivers cannot fully predict how traffic situations might develop and sufficiently evaluate their own skills. This often results in an over-estimation of one’s own capabilities. Novice drivers also often experience pressure when they find themselves in youth-specific driving situations, like driving home at night with peers. Initial driver training often lacks sufficient attention to attitudes and motives for safe driving as well as higher order skills such as traffic insight, self-assessment, hazard perception, and risk awareness.

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\(^3\) [http://www.trafficeducationcontest.eu/](http://www.trafficeducationcontest.eu/)

\(^4\) [www.savekidslives2015.org](http://www.savekidslives2015.org)


\(^6\) [http://www.swov.nl/rapport/Factsheets/UK/FS_young_drivers.pdf](http://www.swov.nl/rapport/Factsheets/UK/FS_young_drivers.pdf)
In its interim evaluation of the road safety policy framework 2011-2020, the European Commission acknowledges that the driving licence test should not be restricted to checking the candidate’s knowledge of the Highway Code or their ability to carry out standard manoeuvres. The Commission sets out to consider how to include broader driving skills, or even an evaluation of values and behaviour related to road safety (awareness of the risks) and defensive, energy-efficient driving. It also sets out to study the potential benefits of graduate schemes for novice drivers.

Higher order skills can only be obtained through training with professional instructors, and through continuous learning. The FIA therefore promotes multi-phase schemes, whereby novice drivers have to undergo mandatory retraining after having obtained their driver’s licence, in order to validate their licence. The focus of this second phase of training should be on self-assessment, coaching and self-reflection and it should be carried out by specially trained and qualified persons.

Austria, Estonia, Finland, Luxembourg, Slovenia and Switzerland have already implemented second phase training. In Austria, a multi-phase driver training scheme for novice drivers was introduced on 1 January 2003. As a result, the number of traffic deaths among 18-24 years old decreased from 200 in the year 2002 (the year prior to the introduction of the measure) to 59 in 2014, while traffic injuries among 18-24 year olds decreased from 16,390 in 2002 to 8,334 in 2014. The Austrian multi-phase system notably includes risk awareness training and psychological group discussions. It also includes the sharing of experience with peers, which is believed to create an environment inducing self-assessment and favouring information retention. Multi-phase schemes also offer additional time for instructors to address emerging issues such as the appropriate use of advanced driver assistance systems, or the risks of distraction caused by nomadic devices such as smartphones.

FIA recommendations:

- The revision of EU Directive 2006/126/EC on driving licences to require mandatory standards for examinations and also to include mandatory training delivered by professional instructors
- The revision of EU Directive 2006/126/EC on driving licences to mandate a multi-phase retraining system whereby novice drivers have to undertake further training in order to validate their licence. Higher order skills such as traffic insight, self-assessment, hazard perception, and risk awareness should be addressed during such training

Professional Drivers

The FIA welcomes the European Commission’s stated plan to review the rules for training requirements of professional drivers. Under Directive 2003/59/EC, truck and buses drivers shall be subject to a compulsory initial qualification and compulsory periodic training. The periodic training courses must be organised by an approved training centre. Their duration must be 35 hours and they must be delivered every five years in sessions of at least seven hours. Member States’ competent authorities are obliged to organise both the training courses for the initial qualification and the periodic trainings, and to ensure the quality and approval of centres. Members States decide on training

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8 Note that in Austria the methodology for collecting accident data changed in 2012. Pre and post 2012 figures are therefore not normally compared in Austria, but the figures nevertheless suggest a marked improvement.
curriculums and how trainings are delivered, but a minimum list of topics to be addressed is included in the Directive (Section 1 of the Directive\(^9\)).

The FIA believes there is scope for extending the minimum list of topics under Section 1 of the Directive. Research highlighted the need to focus on higher order skills such as the ability to conduct self-assessments and an understanding of the influence of attitude and motivation on driver behaviour for quality driver training\(^10\). The theoretical model most often cited in research is the goals for driver education (GDE) matrix. A reference to the GDE matrix or emphasis on the need for trainees to undertake self-assessments in a revision of the Directive would be much welcome. Self-assessment can be conducted very effectively during training courses via self-assessment forms and questionnaires.

The implementation of Directive 2003/59/EC varies greatly among Member States. Since professional drivers are frequently expected to travel across-borders, it would make sense to have a more uniform approach to implementing driver training courses across Europe. For instance, the Directive could set practical training (i.e. in-vehicle, or at the very least in driving simulators) as a requirement. At present, Member States (as is the case for instance in Finland, Ireland, Poland and Slovenia) do not necessarily require practical training to be included as part of the periodic training. In such countries, all topics under Section 1 of the Directive are taught in a theoretical/classroom setting. The FIA is of the opinion that practical training, reproducing the experience of real driving situations, is a vital element of effective driver training.

In its present form, the Directive can be implemented by Member States in a manner that adheres to the form, but not the function of the legislation, resulting in less effective outcomes for drivers. Focus can be on ensuring compliance (i.e. drivers undertake the hours of training required) rather than ensuring the training’s quality and effectiveness. In some instances, drivers took the same seven-hour course or module numerous times in order to reach the 35 hours required as quickly as possible. A revision of the Directive should prevent these kinds practices. The purpose of the 35-hour training requirement should be that drivers develop a range of skills through different training courses or modules.

The European Commission could also consider extending Directive 2003/59/EC to professional van drivers. Vans are often driven by employees for whom driving is not the main activity (postal workers, technicians, engineers, movers). However, they may drive on a daily basis, spending as much as half of their working time on the road. These employees usually do not receive any special training and drive on the basis of their valid B driving licence. All employees who drive large vehicles on a daily basis should have access to the training, especially since training facilities are in place in all Member States.

Finally, an ISO 39001 Standard was produced for employers whose operations include having employees that take part in road traffic. The standard allows them to establish and implement a road safety management system. Such standards should be promoted EU-wide and can be part of public procurement policies as the EU seeks to create a European area for public procurement in the context

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of the internal market. ‘Safe’ procurement could be present alongside other requirements in an EU legal Framework.

FIA recommendations:

- Revise Directive 2003/59/EC to extend the minimum list of topics addressed in Section I to include training in higher order skills such as self-assessment and the impact of attitudes on road risk
- Revise Directive 2003/59/EC to ensure trainees do not cumulate attendance at the same training course/module with the sole purpose of rapidly reaching the 35 hours of mandatory periodic training
- Consider extending Directive 2003/59/EC to Drivers using vans for professional purposes
- Promote compliance with road safety management standards as an essential criterion in public procurement of goods and services that involve road transportation

Senior drivers

By 2020, a quarter of Europeans will be over 60 years of age and many of them will continue to rely on the automobile as their main mode of transportation. Most older adults drive safely because they have a lot of experience behind the wheel. When involved in crashes, however, they often suffer more serious injuries than younger drivers because of age-related frailty, especially when they are cyclists or pedestrians. Driving is an important part of remaining independent. In fact, a recent study revealed that along with the decline in cognition and physical function the risk of experiencing depressive symptoms doubles in seniors who stop driving. Policies should therefore focus on safeguarding mobility and refrain from introducing age-related restrictions. Where there is doubt over one’s fitness to drive, refresher courses or assessment drives should be made available and seniors should be encouraged to undertake them voluntarily. Such courses are offered by FIA member organisations and do not have legal consequences on the validity of driving licences. Providing tailored information about life choices or alternatives once seniors are no longer fit to drive is also needed. Necessary information includes:

- How to evaluate one’s own abilities and risk factors
- Refresher courses where driving skills can be checked without fearing legal consequences over the validity of one’s driver licence
- Where to get information and advice
- The dangers of driving under the influence of certain medicines and alcohol consumption
- What alternatives to driving are available if needed (e.g. seniors might be unaware of existing mobility schemes like publicly subsidised taxi vouchers for seniors, etc.)
- What decisions can be taken for oneself to continue driving safely: choosing to drive only during daytime / on certain roads
- What are the benefits of and how to operate new in-vehicle driver assistance systems

• External factors to consider and life-decisions that can negatively affect mobility (e.g. relocating to remote areas)

FIA Member Clubs are largely active in terms of providing such information, self-assessment tools\textsuperscript{13}, or tailored training courses for senior drivers.

The FIA is of the opinion that mandatory medical checks for all senior citizens are not necessary. Beyond that, these tests do not yield productive results as their psychometric properties (e.g. validity and reliability) are not optimal. A recent study conducted in Switzerland concluded that the mandatory introduction of medical checks for senior citizens does not impact the number of road traffic casualties involving senior citizens\textsuperscript{14}. This was in the context of a government proposal in Switzerland to increase the frequency of medical checks for seniors. In the end, the Swiss government decided not to reform the existing system.

Driving restrictions should be considered only in the context of individuals being diagnosed with a physical or mental illness known to impair driving, or following a fitness to drive assessment when an individual has a physical or mental condition suspected to impair driving. In such cases, the decision should be made based on a consultation with specialised doctors. Reference to specialised doctors has the merit to not compromise the trust relationship between patients and their general practitioner.

**FIA recommendations:**

- Promote voluntary refresher courses and assessment drives, where one can check his or her driving abilities
- Encourage mobility alternatives that enable seniors to remain mobile while guaranteeing their safety, and the provision of information to senior citizens
- Refrain from mandating periodical medical checks for all citizens based on age, but ensure that Member States have a clear legal framework for assessing fitness to drive. Such frameworks should favour the referral to specialised doctors tasked to assess a patient’s fitness to drive

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\textsuperscript{13} One example is the RAC Foundation “driving choices for older motorists”: http://www.racfoundation.org/assets/rac\_foundation/content/downloadables/driving\_choices\_for\_the\_older\_motorist\_lang\_parkes\_and\_fernandez\_medina\_0213.pdf

\textsuperscript{14} http://www.fiaregion1.com/download/GABRIEL/die\_sicherheit\_von\_seniorinnen\_und\_senioren\_als\_fahrzeuglenkende\_politischer\_ausschuss\_kurzversion.pdf

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Fédération Internationale de l’Automobile (FIA) Region I office

FIA Region I is a consumer body representing 111 Motoring and Touring Clubs and their 38 million members from across Europe, the Middle East and Africa. The FIA represents the interests of our members as motorists, riders, pedestrians and passengers. FIA Region I is working to ensure safe, affordable, clean and efficient mobility for all. Learn more at fiaregion1.com