



POLICY POSITION ON THE DRIVING LICENCE DIRECTIVE



SAFETY

Executive Summary

The FIA European Bureau welcomes the European Commission's plan to modernising driving licences with a view to improve road safety and prepare the safe transition to higher levels of automation. Verifying the performance levels of the driving licence legislation is paramount for FIA European Bureau and its members.

The FIA European Bureau recommends the revision of the Driving Licence Directive:

- Require mandatory standards for examinations and to include minimum training delivered by professional instructors such as driving schools, associations, and Automobile Clubs.
- Adopt multi-phase schemes and life-long training whereby novice drivers must undertake further training in order to validate their licence.
- Develop minimum standards for driver training which shall include knowledge of ADAS as well as the appropriate use of the systems.
- As a measure to promote the uptake of AFV, the driving licence should be valid both for manual and automatic transmission, regardless of the transmission in which the novice drivers have been trained.
- Ensure that motorists benefit from the same level of rights regardless of the format of the licence they hold (digital or physical).



Background

Around 60% of the population of the European Union (more than 300 million citizens¹) hold a valid driving licence today.

The 3rd Driving Licence Directive² (DLD) aimed at providing the EU with harmonized rules on driving licences to improve road safety, facilitate citizens movement and reduce the possibility of fraud in Europe. Besides, it prescribed the new rules for replacing the different driving licence formats circulating in the EU by a standard European credit card format, with stricter security protection features.

The 3rd DLD also introduced harmonised validity periods for licences (from 10 to 15 years for motorcycles and cars, and 5 years for lorries and buses), further harmonization of categories, reinforcement of progressive access to categories (age, dimensions) and harmonised minimum requirements for driving examiners. Moreover, it established an EU network for the exchange of driving licence information (RESPER – RESeau PERmis de Conduire).

Despite the progress achieved with harmonising the rules on driving licences, significant differences have persisted between Member States, and the developments in the automotive sector suggest that driving training should take into consideration the new trends arising from the development of a cleaner, more digital and automated mobility. Furthermore, the upcoming revision of the Driving Licence Directive allows the legislator to revise the adequacy of its road safety objectives and to support the progress towards lifelong learning for road users.

European Bureau Position

Verifying the performance levels of the driving licence legislation is paramount for FIA European Bureau and its members. The FIA European Bureau welcomes the European Commission's plan to modernising driving licences with a view to improve road safety and prepare the safe transition to higher levels of automation, as stated on the Road Safety Policy Framework 2021-2030³, and calls upon the Commission for a revision of the current framework that addresses the new mobility trends and ensures an improved training across the European Union.

Improved training

Novice drivers are overrepresented in traffic accidents, which remain the main cause of death for children and young people between 5-29 worldwide⁴. In Europe, 67% of young people victims of road accidents are drivers, with the fatality rate among drivers aged 15-24 being two to three times higher

¹ European Commission, the [implementation of Directive 2006/126/EC on driving licences](#), 2018

² [Directive 2006/126/EC](#) of the European Parliament and of the Council of 20 December 2006 on driving licences (Recast), OJ L 403, 30.12.2006.

³ [EU road safety policy framework 2021-2030 –Next steps towards 'Vision Zero'](#), European Commission (2020)

⁴ World Health Organisation (2018), "[Global Status Report on Road Safety](#)"



than that of more experienced drivers⁵. In the Netherlands, in 2016, it was 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 or 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. Besides, distraction as a cause of driving errors is more prominent in novices than in experienced drivers, as youngsters are frequently distracted, for instance by other passengers or mobile phone use, and that lessens their attention for the traffic situation⁷.

In its interim evaluation of the road safety policy framework 2021-2030, the European Commission acknowledges that driver licensing, targeted education and awareness raising, supported by strong and sustained compliance and enforcement regimes, all have an important role to play in giving road users the capability and willingness to use roads and vehicles safely.

Although the Driving Licence Directive sets minimum EU standards for driving tests and for driving examiners, it does not foresee EU wide rules on driver training, driving schools or driving instructors. Initial driver training often lacks sufficient attention to attitudes and motives for safe driving.

In this regards, the FIA European Bureau believes that an improved training could help drivers to identify potential distractions while driving, as well as better prepare drivers in developing higher-order skills such as traffic insight, self-assessment, hazard perception, and risk awareness.

The FIA European Bureau therefore favours 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 it should be carried out by specially trained and qualified persons.

Austria, Estonia, 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 fatalities among 18-24 years old decreased from 200 in the year 2002 (the year prior to the introduction of the measure) to 45 in 2019, while traffic injuries among 18-24 year old decreased from 16,390 in 2002 to 6,785 in 2019. The Austrian multi-phase system notably includes risk awareness training and psychological group discussions. It also includes sharing experiences 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.

⁵ European Commission summary on [Novice Drivers](#).

⁷ European Commission, [Novice Drivers](#) report, 2009.



FIA European Bureau recommendations:

- The revision of EU Directive 2006/126/EC on driving licences to require mandatory standards for examinations and to include minimum training delivered by professional instructors such as driving schools, associations, and Automobile Clubs.
- The revision of EU Directive 2006/126/EC on driving licences should increase the requirements for training in different traffic and weather conditions, and, therefore, recognising these as crucial factors for safe driving. Its content must be articulated with pre-licence learning while targeting the confrontation of the theory learned with the driver's experience and lifestyle (stress management, sharing the road, peer influence, etc.).
- The revision of EU Directive 2006/126/EC on driving licences, in addition to preserving the quality of the training core competences, should adopt multi-phase schemes and life-long training whereby novice drivers must 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. These trainings should be delivered by driving schools, associations, and Automobile Clubs.

Support for the deployment of Alternatively Fuelled Vehicles (AFV)

The number of alternatively fuelled vehicles (AFVs) on Europe's roads has been steadily increasing over recent years and, in the first quarter of 2019, accounted for approximately 8.5% of all new car sales in the European Union⁸. This increased growth in the number of such vehicles brings with it several challenges and opportunities for motorists.

Although some measures have been taken across Europe to support the uptake and usage of AFVs, the continued growth and development of new technologies and fuels will inevitably mean further actions will be required to ensure motorists the same level of comfort and convenience as they enjoy with traditional vehicles today⁹.

The Implementation Report of the Driving Licence Directive¹⁰ recommended the European Commission to remove the obstacles to the deployment of electric vehicles and vehicles with alternative propulsions, as well as to include topics on such vehicles during the driver training and tests, as it is an important factor in the current climate of new technologies entering the market.

The 3rd Driving Licence Directive foresees the option of taking the driving test with an automatic transmission vehicle; nevertheless, if the test is passed on such a vehicle, the licence is restricted to automatic transmission vehicles, creating a clear disadvantage to the driver that decides to take the exam with an Electric vehicle. As a result, alternative fuelled vehicles are rarely used in driver education mainly because they usually are automatic vehicles. Consequently, in order to maintain consumers freedom of choice and support the deployment of AFV, restrictions applied to training on automatic transmission vehicles should be lifted after the successful completion of the driving test on

⁸ ACEA, Fuel types of new cars: diesel -17.9%, petrol +3.3%, electric +40.0% in first quarter of 2019, 2019

⁹ FIA Region I Policy [Position](#) on Alternative Fuels Vehicles, April 2020.

¹⁰ European Commission, the [implementation of Directive 2006/126/EC on driving licences](#), 2018



such vehicles, while ensuring that driver training includes as well basic knowledge for driving manual transmission vehicles.

Furthermore, the driver training and tests should not include merely knowledge of the functioning and charging of the different powertrains, but also the safety aspects coming from electric vehicles, as new potential hazards to vehicle occupants and rescue workers - such as exposure to corrosive chemicals and toxic fumes and fire following accidents - could appear¹¹ and, therefore, the expected driver behaviour in case of accident may differ from the case of a traditional combustion engine.

FIA European Bureau recommendations:

- Calls on the Commission to support raising awareness of Alternatively Fuelled Vehicles, by setting a mandatory examination standard for knowledge on alternative fuels, compatibility of fuels and charging.
- As a measure to promote the uptake of AFV, the driving licence should be valid both for manual and automatic transmission, regardless of the transmission in which the novice drivers have been trained.
- The revision of EU Directive 2006/126/EC on driving licences should address new safety aspects coming from the deployment of electric vehicles, such as issues coming from batteries and learning how to react in the cases of accident.

Advanced Driver Assistance-Systems (ADAS) and automation

The automotive sector is developing technologies to further assist drivers, which could ultimately lead to fully automated driving. To gear up this deployment, the European Commission published in May 2018 a strategy - Communication on Connected Mobility¹² - which includes the use of driver assistance systems as a step towards fully autonomous vehicles, while aiming at placing Europe as a leader in the sector.

Advanced driver-assistance systems (ADAS) are vehicle-based intelligent safety systems¹³, which aim at improving road safety¹⁴. Such systems are designed to assist the motorist in the driving task, and not to take control of the driving functions¹⁵.

While ADAS technologies are still maturing, they are already placed in the market¹⁶, providing different levels of support to the driver. According to the revised General Safety Regulation, all new cars put in the market will have to be equipped with a set of mandatory advanced safety systems as of July 2022.

¹¹ European Road Safety Observatory, [Vehicle Safety 2018](#).

¹² '[Communication on the road to automated mobility: An EU strategy for mobility of the future](#)' (COM(2018) 283), European Commission, 17 May 2018.

¹³ '[Advanced driver assistance systems](#)', European Commission, European Road Safety Observatory, 2018

¹⁴ '[ADAS Covenant - Increase safe use of ADAS through the promotion of ongoing development, familiarity and purchase](#)', ADAS Alliance, June 2019

¹⁵ '[2018 Automated Driving Tests - What are Automated Driving Systems?](#)', Euro NCAP, December 2019

¹⁶ '[Who is in control? Road Safety and Automation in Road Traffic](#)', Dutch Safety Board, November 2019



As certain ADAS will be mandatorily installed in vehicles from 2022, FIA European Bureau believes that in order to remove the obstacles for the uptake of such vehicles and to ensure that these systems effectively deliver road safety benefits, it is crucial that drivers understand the capabilities, limitations and functioning of ADAS technologies and, therefore, they should be part of the driving basic training and, ideally, retaining systems.

The implementing report of the Driving Licence Directive notes that it seems essential to receive up-to-date training on the vehicle developments and ADAS. The driving examiner must be familiar with the future technological challenges (navigation systems, adaptive cruise control, lane keeping systems, inattention warning systems, semi-autonomous driving systems) which are becoming more and more present. Consequently, the safe and adequate use of these systems needs to be learned during the driver training and, if possible, tested¹⁷ to decrease the gap between training and real-world driving with ADAS. Also, promoting the harmonisation of human-machine interfaces fitted to vehicles would ensure that all drivers and users can interact with vehicles without compromising safety, as stated on the Commission's Road Safety Policy Framework 2020-2030.

FIA European Bureau recommendation:

- The revision of EU Directive 2006/126/EC on driving licences to develop minimum standards for driver training which shall include knowledge of ADAS as well as the appropriate use of the systems.

Digital Driving Licences

Digitalization brings many opportunities for improving road safety, be more connected and increasing drivers' convenience. The Driving Licence in a digital format would allow drivers to use a mobile application to demonstrate holding a valid driving licence instead of using the physical plastic card.

The digital format could present a series of advantages both for the drivers and for the authorities, such as displaying the updated photograph of the driver, the current status of the licence, as well as vehicle information. However, it also presents some uncertainties for drivers and, therefore and in order to be safely implemented, it would require a series of anti-fraud, cybersecurity and data protection safeguards.

In Europe, several countries, such as Spain¹⁸ and Norway¹⁹, are currently working on the implementation of the Digital Licences and the respective public traffic authorities have already released a mobile application that allows the drivers to display their driving licence digitally in their mobile device and, in the case of Spain, the vehicle documentation as well. Likewise, the Finnish traffic authorities have been testing during 2019 a beta app²⁰ to carry the driving licence digitally. The very

¹⁷ European Commission study on [Driver Training, testing and Medical Fitness](#), 2017

¹⁸ <https://sede.dgt.gob.es/es/appmidgt/>

¹⁹ <https://www.vegvesen.no/en/driving-licences/driving-licence-holders/digital-driving-licence>

²⁰ <https://www.traficom.fi/fi/ajankohtaista/mobiiliajokortin-sisaltava-autoilija-sovelluksen-beta-poistuu-kaytosta-sovelluksesta>



positive feedback received has encouraged Finland to keep working on a revised version of the tested application, envisaging to release it during 2020.

FIA European Bureau welcomes a modernization of the licence format, as the digital format offers more convenience and reliability for motorists. Nevertheless, in addition to the concerns related to data protection and cyberthreats, it is important that motorists have the choice to continue using the traditional physical licence, so that moving to the digital licence does not leave anyone behind.

Additionally, it is essential that motorists hold the same level of rights regardless of the format of the licence and do not find any hurdles when validating or checking the status of the licence either nationally or across borders.

FIA European Bureau recommendations:

- Member States should efficiently coordinate the implementation of minimum data protection safeguards, as well as measures to protect drivers against document fraud and cyber threats.
- The European Commission and national authorities should ensure that motorists benefit from the same level of rights regardless of the format of the licence they hold (digital or physical), as well as that there are not cross-border hassles of licences issued in different Member States. Both validity and status of the licence should be easily verifiable both nationally or across borders.
- The recognition of digital licences should be an inclusive measure. Therefore, digital formats should be recognised in addition to the recognition of physical cards, which should continue to be recognised as valid formats.

Mutual recognition of driving disqualifications

Rules like speed and alcohol limits, as well as enforcement, are a competence of the Member States. In the EU, non-resident drivers represent about 5% of traffic, but about 15% of traffic offences.

Since the Convention on Driving Disqualifications (98/C 216/01)²¹ is no longer in force, the EU adopted in 2015 the Cross-border enforcement legislation²², which facilitates the pursuit of traffic offenders from another Member State by the one where they committed the offence, including offences such as speeding, running red lights, failing to use safety belts and drink driving.

The European Commission stated²³ its willingness to make the current legislation more effective by assessing whether the mutual recognition of driving disqualifications and of penalty points between countries (where a penalty point system exists) could also be feasible and add value.

FIA European Bureau welcomes the intention of the Commission to pursue traffic offenders across the EU; however, and given the fact that the national legal enforcement mechanisms widely diverge

²¹ [Convention on Driving Disqualifications](#) (98/C 216/01)

²² [Directive \(EU\) 2015/413](#) OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 11 March 2015

²³ [EU road safety policy framework 2021-2030 –Next steps towards ‘Vision Zero’](#), European Commission (2020)



across Europe, Member States should solely, under the subsidiarity principle stated in article 5(3) TFEU²⁴, keep the competence to legislate on driving disqualifications.

- **FIA European Bureau recommendation:** following the subsidiarity principle, it is a Member State competence to legislate on driving disqualifications due to the differences in national legal and enforcement mechanisms.

Medical Checks on senior drivers

The European Commission estimated²⁵ that, at the start of 2018, 19,7% of the EU's population is above 65 years old, and this figure is expected to reach 29,5% by 2050. Natural ageing generally affects in a negative way mental and physical abilities which are critical for safe driving, including attention, executive functions, reaction time, memory, as well as visual acuity and motor coordination, resulting in elderly drivers being more prone to get involved in a car accident.

Despite this, 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 study²⁶ 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 European Bureau member organisations²⁷ 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.

²⁴ [Treaty on the Functioning of the European Union](#) 2012/C 326/01

²⁵ European Commission, [Ageing Europe](#), 2019

²⁶ <https://www.mailman.columbia.edu/public-health-now/news/health-goes-downhill-when-older-adults-stopdriving>

²⁷ i.e. IAM Roadsmart [Mature Driver Review](#).



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

The FIA European Bureau disputes the added value of mandatory medical certifications for all senior citizens. A recent study by the Commission²⁸ showed that there is no evidence that a general age-based system to assess fitness to drive has substantial safety benefits. Beyond that, these tests do not yield productive results as their psychometric properties (e.g. validity and reliability) are not optimal.

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 European Bureau recommendations:

- Disputes the added value of mandatory medical certifications based on age, and stresses that Member States must 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
- Material that allows senior drivers to self-assess their driving abilities (i.e. brochures, test procedure and online courses) should be facilitated and promoted. Family members of these individuals also require such materials to help them in deciding whether to initiate an assessment process.
- Encourage mobility alternatives that enable seniors to remain mobile while guaranteeing their safety, and the provision of information to senior citizens
- Promote voluntary refresher courses and assessment drives, where one can check his or her driving abilities.
- Safer road use habits should be encouraged particularly (but not only) through self-regulation, assisting individuals to continue to drive for as long as it is safe to do so, making appropriate adjustments to their driving, and transitioning from driver to non-driver.
- Guidelines for assisting Medical practitioners in their assessment should be set.

²⁸ European Commission study on [Driver Training, testing and Medical Fitness](#), 2017



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Fédération Internationale de l'Automobile (FIA) European Bureau

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