



Public consultation on Directive 2003/59/EC

Input provided by: the European projects
ProfDRV (www.project-profdrv.eu) and
ICT-DRV (www.project-ictdrv.eu)

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The answers in this questionnaire are based on the results of the European projects ProfDRV and ICT-DRV that are/ have been implemented in the framework of the Lifelong Learning Programme of the European Commission. The answers in this questionnaire do not necessarily reflect the opinions of the different consortium partners but the results of the research and development work of the two projects.

Executive summary

The implementation of Directive 2003/59/EC is challenged due to the very different implementation approaches all over Europe. Those vary not only from country to country but also between training providing institutions. The ProfDRV research showed that this leads to a very heterogeneous landscape of professional drivers qualification based on the directive that ranges between no increase in competence at all up to an entry level vocational education qualification. This entry level does, however, still not meet the requirements that have originally been stated within the Directive. Annex 1 of Directive 2003/59/EC requires an EQF (European Qualifications Framework) level 3 or 4 qualification as initial qualification. This equals a German skilled worker certificate that includes a 3-year apprenticeship training. The ProfDRV research showed that the Directives implementation usually does not exceed a level 1 or 2 qualification of the EQF if it can be measured against the EQF at all.

The proposed solution for this situation is the application of the EQFs learning outcomes approach in order to enable comparability of the different national application approaches. The learning outcomes approach requires the definition of a required qualification standard in terms of learning outcomes. Learning outcomes are defined as what a learner knows, understands and is able to do after completion of a learning process. In this way the focus would be shifted away from learning input (such as length of study and learning methodology) which are not comparable as a basic rule but to the learning outcomes that allow for a comparison of qualifications. The ProfDRV project developed a complete learning outcomes based profile for the occupation "professional driver".

The current shift towards learning outcomes within vocational education and training, however, shows that this approach requires a major change within thinking and practice among those involved into the realisation of training. Those changes have been partially described in this questionnaire and are also integral part of the ProfDRV quality standards for professional driver qualification. Those have been drafted in accordance with the learning outcomes approach and the related European vocational education and training tools.



2. The general relevance and effectiveness of the Directive

2.1. The importance of education and training of drivers

The first series of questions does not refer to the current content of the Directive in a strict sense, but looks beyond to understand the wider role the Directive can play for road safety, for the transport sector and the profession of driver.

The European Commission's action in the area of transport of goods and passengers by road is based on the strong belief that action in this area is an important element to increase safety on European roads and that the qualification and training of drivers have an important role to play. In 2009 alone, more than 4,200 people died in road traffic accidents involving so-called Heavy Goods Vehicles (HGVs), meaning vehicles of over 3.5 tons maximum permissible gross vehicle weight. In the overall number of accidents the share of trucks is modest. However, while less than 2.5 % of the total road accidents lead to fatalities, over 6 % of the accidents involving heavy good vehicles lead to fatalities. A study on the causes of accidents involving trucks has shown that around 85 % of the accidents are linked to human error of one of the road participants. Other causes of accidents such as weather and infrastructure conditions could as well be mitigated through specific training of drivers.

1. Do you think that qualification and education of drivers engaged in the transport of goods or passengers by road have an important contribution to make to road safety?

Yes

Comments:

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The current Directive provides some minimum training requirements but does not provide specific rules on the mutual recognition for the profession of drivers. The horizontal Directive 2005/36/EC on the recognition of professional qualifications applies therefore by default to the profession of drivers, but only partially fills the void. As far the drivers' profession is concerned, Directive 2005/36/EC does not provide for automatic recognition rules based on harmonised minimum training requirements.

2. Do you think that the level of mutual recognition of the profession currently stipulated in the Directive is sufficient or should a higher level of recognition be pursued?

Yes, the current level of recognition is sufficient

Comments:

Directive 2003/59/EC makes Directive 2005/36/EC to some extent obsolete with regard to the recognition of professional driver qualification because all member states need to recognize the CPC and therefore the requirements to enter into the profession issued by another country (such as through the 95 in the driving license) anyway regardless of the way this CPC has been acquired as long as it is legal in the issuing member state. Therefore, there is no need to further regulate recognition of qualifications in this context as it is done in Directive 2005/36.

However, this would look differently if Directive 2003/59 would have another character such as the requirement to hold a formal VET qualification in professional driving in order to enter into the profession "professional driver" without further specifications on the certification. In this case mechanisms to ensure mutual recognition would be necessary.

Furthermore a higher level of recognition is necessary with regard to the recognition of qualification parts such as in the context of periodic training, but this topic is dealt with later on.



The profession of driver frequently suffers from the image as a low qualification profession, with professionals operating in this sector being considered as easily replaceable workforce. The establishment of an increased harmonisation of requirements of higher training and qualification standards to become a professional driver is meant to increase the consideration and the value of the profession and thereby also its attractiveness for young people entering the labour market.

3. Do you think that the setting up of an increased harmonisation of requirements would increase the consideration of the profession of driver?

Yes

Comments:

Generally, it is important that the public and especially the transport and logistics sector finally recognise that professional driving is no longer an occupation everybody can carry out but that a competent implementation of drivers' tasks requires the qualification of a skilled worker in this field similarly to occupations such as carpenters or clerks. The necessity to hold a certain vocational qualification in order to enter into this profession is, therefore, very useful in order to increase the value of this occupation.

However, the way how Directive 2003/59 is implemented is not effective here because (1) the practical implementation of the driver CPC ranges far below the qualification of a skilled worker and does therefore not improve its value and (2) the CPC is only in a few cases implemented as a formal VET programme (NL) being associated with qualified (and valuable) work.

This development is very unfortunate because Directive 2003/59 includes a reference to a skilled worker level: "The minimum level of knowledge may not be less than level 2 of the training-level structure provided for in Annex I to Decision 85/368/EEC(1), i.e. the level reached during compulsory education, supplemented by professional training." (Annex 1 of directive 2003/59/EC). This level 2 of Decision 85/368/EEC(1) refers to skilled worker certificates as they are for instance associated with the German skilled worker certificates. In the meantime Decision 85/368/EEC(1) has been replaced with the European Qualifications Framework which means that the driver CPC as defined by Directive 2003/59 would require an EQF-level 3 or 4 qualification for the driver CPC. The ProfDRV-research, however, leads to the conclusion that the CPC as currently realised can be referenced as a maximum to level 1 or 2 of the EQF which is far beyond the qualification level originally intended and required by Directive 2003/59 and necessary to make a difference.

The creation of a single market, with equal possibilities of access for all citizens of the EU and with no discrimination based on nationality or on the differences of requirements in the various Member States is a key objective of the European Union. The harmonisation of qualification and training requirement for drivers, intends to ensure fair and equal conditions for undertakings and drivers across the EU. However, there is substantial room for further harmonisation by establishing for example a common framework for the training and the testing, by further harmonising the content of the training, and setting common requirements for training centres and instructors. The harmonisation of all of these aspects could further contribute to levelling the playing field at higher quality levels than today for undertakings and drivers throughout the EU, while at the same time also increasing road safety and improving the preparation of drivers.

4. Do you think that the establishment of a common framework for the training and the testing, further harmonisation of the content of the training, and the setting of common requirements for training centres and instructors could further contribute to the objectives of the Directive?

No



Comments:

The ProfDRV results but also evaluation and research in the field of VET in Europe clearly show that a harmonisation of qualifications in terms of training input, curricula, etc. (as asked for here) is NOT useful and effective beyond borders in Europe because

(1) training contents, methodical standards, etc. change too fast in order to be able to react in a timely manner at a European scale, Member States usually have systems for this kind of changes in place for their formal VET programmes and

(2) this kind of frameworks lead to qualifications that are not integrated into the national formal VET systems (see previous answer) and lead to strong deficits in terms of quality because they do not integrate existing and successful quality assurance systems as they are usually in place for the formal VET systems in the EU member states.

This kind of framework has already been evaluated as not useful in Europe (see document A6-0132/2008) and the European Qualifications Framework with its learning outcomes approach has been put in place in order to replace Decision 85/368/EEC which intended to work with a similar approach due to these reasons.

It can, therefore, only be recommended to learn from the experiences made with Decision 85/368/EEC which led to the European Qualifications Framework and to make national qualifications for professional drivers comparable and/or to define a common minimum standard for professional driver qualification in Europe in terms of learning outcomes instead of defining/standardising input parameters (training content, duration, etc.) which proved not to be successful in the past already at several occasions. One of those occasions being the experiences made with Directive 2003/59 and its implementation approach.

2.2. The impact of the Directive

This second set of questions intends to analyse, whether the Directive has managed to meet the overall objectives that were set at the time of its adoption.

The Directive was adopted to guarantee initial qualification and periodic training of drivers of certain road vehicles to increase safety on European roads. The European Commission wishes to hear the stakeholders' opinion as to if and to what extent the Directive has actually met this objective and contributed to road safety (e.g. by improving the knowledge of road traffic regulations, changing driving attitudes, improving compliance with working time periods or increasing the awareness of risks).

5. Do you think that the Directive has contributed to increasing safety on European roads? Please explain your answer in the comments section.

NO

Comments:

The ProfDRV results show different opinions of stakeholders with regard to this question. One half of the interviewed stakeholders says NO, the other half indicates that it is too early to judge. Only very few stakeholders claim that there would already be an increase of safety through the Directive.

However, looking at the reality of the Directives implementation in Europe in terms of training quality parameters, the effectiveness of the training implemented in the framework of the Directive with regard to road safety needs to be seriously doubted because in a majority of cases the quality of training seems to be not sufficient to have a practical impact.



The initial qualification and the periodic training stipulated in the Directive are intended to ensure that professional drivers have the necessary qualifications to drive their vehicles, thereby contributing to the development of the professionalism of the sector.

6. Do you think that the Directive has contributed to the development of the level of professional competence of drivers?

Yes only marginally

Comments:

It is already a success that a minimum level of vocational abilities needs to be proven as entry requirement into the profession and that a continuous update of a professional drivers vocational abilities is considered as necessary in order to carry out this occupation. However, this contribution is only marginally because:

(1) the level of competence possibly reached with the current framework and status of the Directives implementation is by far too low in order to meet the qualification needs of this occupation and

(2) the quality of the implementation is by far too low in order to achieve a meaningful impact on the drivers professional competence.

The common qualification and training requirements set in the Directive are also intended to facilitate the free movement of workers in the sector within the EU by creating a comparable level of qualification, which addresses concerns that professionals from another Member State might not have the same level of competences.

7. Do you think that the Directive has facilitated the mobility of drivers in the transport sector?

No

Comments:

The ProfDRV research showed that neither drivers nor employers consider the Directive as a possibility to ensure a common level of qualification that can be relied on when working/ recruiting from abroad. Additionally the interviewed persons indicated that they do not trust into a real comparable qualification level across EU what is also strongly supported by the ProfDRV results.

But the interview partners also indicate, that there are other factors of higher relevance in the recruitment from/ job seeking process abroad than an equal level of qualification. They indicated that the CPC makes no difference regarding their decision to hire from/ apply abroad or not!

The setting of common qualification and training requirements in the Directive has the objective to ensure that equal conditions for competition apply and that there is a level playing field for drivers and undertakings in all Member States.

8. Do you think that the Directive has contributed to the creation of a level playing field for drivers and undertakings?

No

Comments:

The ProfDRV results clearly show that the Directive as it is today (defining primarily input parameters) cannot and does not lead to a common level of professional driver qualification in Europe. Although a number of input parameters such as length of study, content, etc. are defined by the Directive the chosen implementation approaches (at national, regional, provider or even trainer level) they lead to and especially the pedagogical quality of training are so different in reality that the results of learning vary between no relevant vocational competence up to an entry level of vocational qualification in the field. This is the case because it is not



possible to standardise all the training input parameters necessary in order to achieve a common qualification level in a complex field such as vocational education and training for professional drivers.

This is of course no new finding because it was one of the basic considerations that led to the approach chosen within the European Qualifications Framework (see answers to question 4). As a possibility to find a solution for this problem and to make qualifications comparable across borders the EQF applies the learning outcomes approach. This approach does not longer look at the way how learning takes place but only uses the outcomes of learning in order to compare qualifications. This approach could likewise be used in order to define and realise a common minimum qualification level/ standard for professional drivers (a sample for such a learning outcomes based profile has been developed by ProfDRV: <http://www.project-profdrv.eu/index.php?id=254>) by defining this minimum qualification in terms of learning outcomes with no or only minor requirements on the input parameters.

2.3. Scope of the Directive and Exemptions

The Directive contains a definition of its scope as well as a list of vehicles and uses to which it does not apply. Both must be taken into account in order to establish the applicability of the Directive to any given case. Notwithstanding the differences in the objective, an alignment with the definition of the scope and the exemptions contained in Regulation (EC) No 561/2006 on the harmonisation of certain social legislation relating to road transport regulating inter alia the working and rest periods of drivers could provide more clarity. Alternatively, a separate system of exemptions not related to other EU legislative measures could be elaborated.

9. Do you think that the alignment of the scope and the exemptions of Directive 2003/59/EC with the ones stipulated in Regulation 561/2006/EC would best increase clarity on the scope of the Directive? Alternatively, do you think that a separate system of exemptions would be the most adequate option?

Comments:

The projects in question did/do not work on this question.

As part of the review process consideration could be given to broadening the scope of application of the Directive to all holders of C or D driving licences or to include also certain professional drivers holding other types of driving licences. The inclusion of other professional drivers could mean for instance the inclusion of taxi drivers or drivers of vans of up to 3.5 tonnes.

When considering this issue, two factors must be taken into consideration: on the one hand, the importance of a wide application of the Directive for the purpose of increasing road safety, and, on the other hand, the importance of not imposing a disproportionate administrative, economic or social burden on the administrations, undertakings and individuals concerned.

10. Who do you think the regime of qualification and training of the CPC should apply to?

Comments:

The projects in question did/do not work on this question.



2.4. Access to professional driving

The available data point to the fact that the involvement of young people in road accidents is statistically higher than in any other age group.

A system of gradual access to professional driving requiring the various categories of C and D driving licences could be an option to regulate the access of young drivers in such a way that access to more challenging categories of heavy vehicles would be granted only after sufficient experience has been gained in less challenging categories. Such a system is already in place for motorcycles requiring category A driving licences, stipulating the access to heavy motorcycles either gradually by progressing through lower categories or through direct access at a higher age. The application of a similar type of model based on a choice between progressive and direct access to professional driving with C and D licences could be considered.

11. Do you think the CPC training should be structured in such a way to offer an option between gradual access to professional driving at an earlier age on the basis of training and experience and direct access at a higher age?

Yes/No

Comments:

This question has not been explicitly elaborated in the framework of the ProfDRV project but such systems of progressive qualifications within professional driving are applied in the context of qualification frameworks for professional driving abroad so for instance in New Zealand and partially Australia. This system could possibly provide additional information on the introduction, the parameters and on experiences with such a system.

Expanding also on question 4, a reorganisation of the training based on a system of modules structured on the basis of what the driver knows, understands and is able to do at the end of each of these modules (so-called "learning outcomes") could make the functioning of this system easier. The modules could rely on a common methodology and a common way of testing. The quality of the content of the modules might usefully be assured by applying the European Quality Assurance Reference Framework for Vocational Education & Training (EQAVET). For each completed module drivers could receive validation and recognition in the form of credits. The credits system could assure additional flexibility in the acquisition of knowledge by drivers and also allow drivers to easily transfer the credits already acquired from one Member State to another were they to move during the training. Alternatively, the current system leaving Member States and in some case single training centres the freedom to organise the training as they wish, could be maintained.

12. Do you think that a new structure of the training based on modules should be introduced or do you favour the current free system?

Other

Comments:

The introductory text to this question mixes different concepts that require different answers:

_Application of the learning outcomes approach independently from way of learning ... the necessity for this approach in order to enable the realisation of a common qualification level has been argued before

_Application of EQAVET ... EQAVET relies on the application of a quality assurance cycle, this is useful and should certainly be applied. However, the ProfDRV results allowed the conclusion that the introduction of additional quality indicators is necessary, those have been outlined in the ProfDRV quality standards for professional driver training (<http://www.project-profdrv.eu/index.php?id=255>)

_Modules in the framework of initial qualification/ IVET ... It is certainly not useful to further break the current initial CPC training down into modules. However, modules could be used in order to allow CPC holder to upgrade their qualification to a formal VET qualification within professional driving under recognition of the



CPC. If a general upgrade of the CPC to the originally aspired qualification level of a skilled worker is realised, the application of ECVET modules is certainly an option that can benefit the learner and industry. Progressive qualifications can be considered in this context.

_Modules in the framework of continuous/ periodic training ... Learning outcome oriented modules and their mutual recognition as meant by ECVET can certainly be used as a model here to allow the recognition of learning across borders.

_Application of credit points ... Credit points proved to be not useful within the ECVET system.

The further elaboration and testing of such an approach by institutions that provide the necessary experience and know-how with regard to EQF/ECVET and professional driver training is, however, strongly recommended! The ProfDRV coordinator and consortium is able to provide the full set of expertise necessary for this task.

2.5. Mutual recognition and certification of training

The certification of the periodic training of drivers undergoing the training in the country where they work has led to difficulties, if the host country normally enters the code 95 in the driving licence, as it is not possible to do so with a foreign driving licence. The drivers' home countries have not always been willing to mark the code 95 on the basis of a CPC obtained abroad, as the CPC is currently not a mutually recognised document. However, professional drivers working in another Member State need to see their training recognised in order to be able to continue to carry out their profession. The free mobility of workers within the EU would be hindered, if this were not possible.

There are two main options considered to overcome this problem. The first one would be on the basis of a mutual recognition of the CPC to stipulate that drivers can go back to their home country and have the code 95 marked on the basis of a CPC obtained abroad. Alternatively, all Member States, also those which currently mark the code 95 in the driving licences could be required to issue a separate driver qualification card to holders of foreign driving licences, who obtained a CPC in their country.

13. How do you think the training should be certified as regards drivers obtaining the CPC in another Member State?

Comments:

This question has not been elaborated in the projects frameworks.

At the moment no common format for the CPC exists. If the CPC were to become a mutually recognised document, the absence of a common format for the document could lead to difficulties. National authorities could have difficulties in determining the validity of a CPC issued by another Member State and the risk of fraud could increase. A harmonised format for the CPC as a document would address these risks.

14. Do you think that the establishment of a harmonised format of the CPC as a document becomes necessary, if the CPC becomes a mutually recognised document?

Yes/ No

Comments:

This question has not been elaborated in the projects frameworks. However, looking at question 12 and the ECVET or Europass approaches that are put in place in Europe, the development of common certificate templates applied within this system has proven to be beneficial in order to simplify communication.



3. Structure and content of the training

3.1. Specificity of the CPC

In its current form the Directive does not define clearly the specificity of the CPC vis-à-vis other types of trainings or tests. This has led in some Member States to the possibility of a combination of CPC training with for example training on the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR). In other Member States testing for the CPC can be combined with the normal driving licence testing. Allowing for the CPC to be combined with other trainings or tests may lead to a dilution of the specific characteristics of the CPC training and may reduce the specific value of the CPC training as well as its effectiveness. It could also undermine the effort to generate a higher professionalization of the transport sector through the CPC training.

15. Do you think that training for the CPC should be explicitly separated from other forms of training in order to preserve the specificity of the CPC training and its objectives?

No

Comments:

The answer to this question strongly depends on the overall concept that is applied for periodic training (see question 23) but generally the ProfDRV results show that a more flexible and learner and industry oriented approach with regard to topics covered within periodic training strongly increases satisfaction and therefore acceptance of the driver CPC training by drivers and employers.

16. Do you think the CPC test should be explicitly separated from the driving licence test?

Yes/No

Comments:

This question has not explicitly been explored within the ProfDRV project.

3.1.1. Initial qualification and training

Under Article 3 of the Directive, the activity of driving is subject to a compulsory initial qualification. As the emphasis is on the initial qualification in itself and not on the way this qualification is obtained Member States have the possibility to choose between an option that foresees both course attendance followed by a theoretical test and an option that only foresees a theoretical and a practical test without any mandatory course attendance beforehand. After the successful completion of the test the CPC is issued to drivers. The length and the content of the training foreseen under the first option are clearly stipulated in the Directive.

The possibility of choosing between two options for the initial qualification, allows Member States to select the option they deem most suitable for their country. At the same time the absence of a mandatory training under the second option leads to the concern that the higher level of preparation which the CPC should certify might not really be obtained.

17. Do you think that all drivers should have to undergo a minimum initial training before obtaining the CPC?

No

Comments:

... but following a course or other kind of prior training should be necessary in order to pass the test. Otherwise the test is not meaningful and has such a low level that it cannot be considered as contributing to “the



development of a level of professional competence” (see question 6). Because how can an individual gain really meaningful prior learning within a certain field of skilled work when he/she is not allowed to work in this profession without the CPC? In such cases it needs to be questioned if the test is useful at all or makes any difference?!

However, a difficult test is not necessarily a reliable one! A valid and reliable test based on common predefined learning outcomes and appropriate assessment methods testing knowledge, skills and competences as they have been defined previously should be put in place! This means also that participants should pass through the same test regardless of the way they have learned before! Otherwise an equal treatment and valuing of different forms of learning (formal, non-/ informal) as asked for by European education policy is not given. Also here the overall directive and, therefore, the introduction of a common minimum qualification level of professional drivers could strongly benefit from the introduction of the learning outcomes approach, that defined a common and comparable qualification standard for all over Europe!

Of course it should always be possible to pass the test also based on prior/ non-/informal learning because there are and will of course always be individuals who are able to prepare themselves for this kind of test for different reasons. Those people should be given the chance to receive recognition of their non- and informal learning (see also Council recommendation 2012/C 398/01 on the validation of non- and informal learning) but they cannot be the rule!

The subjects to be covered during the initial and the periodic training are organised around three main themes: ‘Advanced training in rational driving based on safety regulations’, ‘Application of regulations’, and ‘Health, road and environmental safety, service, logistics’. Annex I lists the single subjects to be covered in these three areas. They are meant to provide drivers with the necessary competences to improve road safety and at the same time make a useful contribution to their professionalization.

18. Are the subjects listed in Annex I for the initial and periodic training relevant for the objectives of the Directive? If there are subjects you consider irrelevant, please indicate them.

Yes somewhat

Comments:

The learning outcomes necessary in order to implement the tasks of a professional driver have been extensively explored in the framework of the ProfDRV project (<http://www.project-profdrv.eu/index.php?id=254>). The result is a optimum profile for the professional driver qualification expressed in learning outcomes (knowledge, skills, competences based on the concept of the European Qualifications Framework).

The ProfDRV profile is to some extend less specific with regard to the actual contents/ knowledge to be addressed during training. It, therefore, leaves more space for the review and renewal of contents based on changes of the state of the art in the occupation which appears to be necessary because some of the annex 1 contents are already outdated!

At the same time the ProfDRV approach has a far stronger reference to the actual work processes/ tasks carried out by professional drivers. Based on the EQF approach the knowledge, skills and competences refer clearly to the process of work and map the core tasks of professional drivers in terms of the knowledge, skills



and competences necessary to perform competently in their job. The driver CPC lacks this close interrelation with the work process which is especially important in order to answer the industries needs.

19. Are there other subjects which in your view are relevant to the training but are currently not listed in the Annex? *If yes, please list them and explain why.*

Yes

Comments:

The ProfDRV profile differs from the contents defined in annex 1 of directive 2003/59/EC primarily in terms of the required level of processing the specified contents where the Directive does make no or very weak specifications (input vs. output approach!).

Besides this general difference they primarily differ in the following aspects. All are based on their relevance and risk potential for/ within the tasks of professional drivers:

_The topics occupational health and safety and healthy lifestyle play a more prominent role in the ProfDRV profile including topics such as first aid.

_In a similar way also the dealing with violent situations and crime are further specified.

_While the driver CPC limits contents on vocational education and training to the legal requirements, the ProfDRV profile includes the ability to update the own abilities continuously and autonomously.

_Also the component on the drivers' image in public or at the clients play a more important role in the ProfDRV profile.

_New contents added by the ProfDRV profile are customs handling, handling different means of payment and the dealing with company-internal regulations.

Most of these differences can be related to the differing intents of the two instruments: the driver CPC being a minimum qualification and the ProfDRV profile describing an optimum situation. It, therefore, needs to be specified and agreed upon if indeed additional contents need to be integrated or if a better definition of the required level of processing is sufficient.

Section 2 of Annex 1 stipulates that during the initial training a driver must drive for at least 20 hours individually. Of these 20 hours a driver may drive up to 8 hours maximum on a top-of-the-range simulator, but there is no obligation to do so. The use of simulators during the periodic training is currently not regulated at all in the Directive.

20. Do you think that the use of top-of-the-range simulators during the training is useful and should therefore be mandatory?

Yes/No

Comments

Yes and no, the application of top-of-the-range simulators is simply necessary in order to achieve certain learning outcomes that cannot be achieved on the road or in the class-room. This includes among others the training of dangerous/critical driving situations that would in real-life result into fatal accidents in a safe situation.

At the same time, however, there are other learning outcomes that can be trained most effectively and efficiently on a low-cost simulator and do neither require practical training on the road nor on a top-of-the-



range simulator. Certain elements of eco- and defensive driving training are an example here. It is a waste of resources to train routine tasks for eco- or defensive driving on the road or in a top-of-the-range simulator because low-cost simulators address the aspired learning far better.

It can, neither be claimed that the application of a top-of-the-range simulator should be mandatory or not because it depends on the kind of learning outcomes that are meant to be achieved and on the way how a simulator is used within training. Only a pedagogically useful application of a simulator provides an added value for the learner. At the same time it must be doubted if a top-of-the-range simulator is always necessary because for certain learning outcomes low-cost simulators are sufficient or even better because they allow for routinising certain tasks. At the end the day the aspired learning outcomes decide about all this and not the availability of the training tool!

The ICT-DRV project currently explores the useful and learning oriented application and integration of (different kinds of) simulators within professional driver training and CPC training in particular. Results will be available as of beginning of 2014.

In the Directive there is no provision regulating the use of e-learning instruments during the training. The on-going technological progress in the decade since the Directive was approved has led to an ever increasing use of e-learning. The European Commission is interested in stakeholders' view on e-learning to understand if it can make an important contribution to the training of drivers and replace parts of the in-house training or if it does not meet the requirements to guarantee high quality levels of training.

21. Do you think that e-learning could make a useful contribution to the training and can therefore partially replace in-house training?

Yes

Comments:

If e-learning is applied with high pedagogical quality it can certainly make a very useful and valuable contribution to professional driver training especially when considering work-life-balance issues within this profession. Also here the appropriate application of e-learning with regard to the aspired learning outcomes, the specific (learning) characteristics of professional drivers, the state of the art of instructional design and the right design decisions are crucial.

However, it needs to be stated that initial research within the ICT-DRV project allows the conclusion that the very limited current practice of e-learning within professional driver qualification can only very rarely if at all be considered as high quality and has many deficits! This should, nevertheless, not prevent the implementation of e-learning for the sake of the drivers who can strongly profit (in terms of work-life-balance and learning culture) from this kind of learning. It should rather result into the definition of relevant quality standards in this field as they are currently explored and defined by the ICT-DRV project.

One of the major concerns against e-learning in the sense of distance learning is the difficult checkability if the right person is in front of the computer and follows the training over the required training duration. This concern is, however, obsolete in the context of the learning outcomes approach and/or if e-learning is implemented with high quality. High quality aspects are for instance a learner-centred and research-based design of learning environments, the competences of tutors within distance learning, etc.. The ICT-DRV project currently prepares samples for such high-quality e-learning. However, high-quality does not necessarily mean a high technological level.



First results of the ICT-DRV project are expected for beginning of 2014. Later on the project will define concrete quality standards for the application of e-learning in this context.

3.1.2. Compulsory periodic training

The Directive requires Member States to establish a system of periodic training based on compulsory course attendance. Periodic training should enable drivers to update the knowledge essential for their work. The duration of the periodic training is 35 hours every five years, given in sessions of at least seven hours. Member States issue the CPC to drivers who have completed the periodic training. The periodic training must be taken by new drivers within five years after obtaining the CPC for initial qualification, and by drivers who hold acquired rights, following the timetable set by their Member States.

Member States and also single training centres have great freedom in determining the content and other aspects of the periodic training. The Directive only stipulates that the periodic training shall expand on and review some of the subjects referred in section 1 of Annex I. This means that there is no common European wide regulation of the subjects to be covered during the periodic training. In some cases the competent national authorities have issued national syllabi for the periodic training, while in other Member States the single training centres are given the possibility of offering a wide variety of courses.

The Directive does not stipulate if practical training has to be part of the periodic training. In some Member States practical training is a mandatory part of the periodic training, while in other Member States the periodic training is based only on theoretic training.

This raises the issue of guaranteeing sufficient uniformity in the periodic training across all Member States and the necessity to assure that all relevant aspects are covered and that the CPC cannot be obtained on the basis of subjects that have little to do with the CPC training. This could be achieved through a uniform European training syllabus for the periodic training, which would also regulate the inclusion of practical training in the periodic training.

22. Do you think there should be a uniform European syllabus for the periodic training?

Yes/No

Comments:

This strongly depends on the overall approach implemented in future with regard to periodic training (see question 23).

However, a common syllabus denies professional drivers to be able to learn and update their abilities workbased/ on the work place through in- and non-formal learning (being a topic of high relevance on the European agenda at the moment!) and leaves formal learning in the classroom as the only valid way of learning. This does not reflect the current European approach regarding the value and the recognition of non- and informal learning (see also Council recommendation 2012/C 398/01 on the validation of non- and informal learning) either.

Furthermore the ProfDRV results show that drivers and employers are more satisfied with periodic training and less consider it as a burden (what contributes to a better learning culture in the branch) when periodic training is more flexible and leaves more space for individual choices and adaptations that meet the needs of industry and workers.

In the same way the Directive does not specify the content of the periodic training clearly, it does not specify if the driver has to undergo a test after the completion of the 35-hours of periodic training either. In most Member States course attendance only suffices for the issuing of the CPC and no test is foreseen to verify if the driver has really acquired the necessary knowledge of the subjects covered during the periodic training.



23. Do you think that there should be a test after the periodic training?

No

Comments:

No, there should be a (possible/optional) test before in order to evaluate if the driver needs additional training in the core elements of the CPC at all and if yes, what topics he/she should be trained in in order to individualise the training to some extent. If he/she is able to complete the test successfully, obviously no additional training (in the basic areas of the CPC) is needed and it can be assumed that he/she was able to update his/her abilities with in- and non-formal learning successfully on the job. The driver therefore has the minimum abilities as required by the driver CPC and needs no further training in order to fulfil the minimum requirements of the CPC. (For the test the same applies as for question 17.)

If not, he/she should attend training in order to fill his/her gaps in the determined core fields of the CPC. The work with adaptive e-learning could play a major role here.

The participation in further continuous training could than be on individual choice if the 35h-rule is kept as a contribution to the overall lifelong-learning strategy and not replaced by a learning outcomes based approach that covers the core elements of the CPC only.

The organisation of the periodic training in the Member States varies not only in content but also in the way the 35 hours of periodic training are distributed over the 5-years period. The Directive only stipulates that the single training periods must be at least 7 hours. Some countries have not regulated the distribution at all, leaving the freedom to distribute it over the whole 5-years period, some have determined that 7 hours of training have to be completed each year, while others have stipulated that the 35 hours of periodic training have to be completed within a limited fixed period of time (e.g. in one block or within 10 months).

24. Do you think that the most efficient way of organising the periodic training is to concentrate it in a limited fixed period at the end of the 5 years period or to distribute it over the whole 5-year period?

Other

Comments:

Now, just after the introduction of the driver CPC, this is of course a crucial organisational question in terms of training capacity. But in general this should be a pedagogical question and can therefore only be judged and decided based on learning/training considerations which strongly depend on a variety of parameters and cannot be answered in a general way or based on an opinion but require far more research and development work in order to be answered meaningful and not based on assumptions, heuristics and pure organisational parameters.

Further to question 11 no mechanism for the recognition of periodic training partially undergone in another Member State is currently foreseen (e.g. a driver undergoes 10 hours of periodic training in Member State A and then moves to Member State B and would like to have these 10 hours of periodic training counted towards the 35 hours of periodic training he has to undergo every five years). The recognition of this partial periodic training undergone in another Member State is not mandatory. It is important to understand if stakeholders see a need for the creation of such a mechanism of mutual recognition.

25. Do you think that a mechanism for the mutual recognition of parts of periodic training undergone in another Member State should be created?

Yes



Comments:

The answer has been given in a previous question already. We are living in the European Union and this also fosters free mobility of workers. A mutual recognition is therefore crucial in a European context and cannot just be left aside in the context of a European Directive!

3.1.3. Approval of training centres and instructors

The training centres providing the initial and periodic training must be approved by the Member States' competent authorities. Annex I section 5 of the Directive lists the documents which must support the application and the conditions under which the competent authority must give approval. Approval can be given only in response to a written application. At the same time it is left to the competent authorities of the Member States to determine what "a suitable qualification and training programme is", and what characteristics the premises where the courses are given, the teaching materials and the vehicle fleet used need to have in order to be considered adequate. The European Commission is interested in hearing from stakeholders if they consider a more detailed regulation of approved training centres (e.g. by means of common quality standards) as necessary to guarantee the same high levels of quality of the training in the whole of the EU.

26. Do you think that the Directive should regulate more in detail the requirements training centres have to meet in order to become an approved training centre?

Yes

Comments:

Those requirements should be less on the training centre as such but rather on the training programme with a clear focus on the (pedagogical) quality of training programmes. The ProfDRV quality standards provide a proposal for this: <http://www.project-profdrv.eu/index.php?id=255>.

The requirements to be met by the instructors are not specified in the Directive either. The Directive only requires training centres to communicate to the competent national authorities the instructors' qualification and field of activity, but leaving it to the national authorities to determine on the basis of which criteria the instructors' qualifications can be deemed satisfactory.

27. Do you think that the Directive should regulate the requirements instructors have to meet in order to become approved instructors?

Yes

Comments:

Trainers are a crucial factor in any kind of training. It is, therefore, certainly useful to define requirements on trainers more precisely. The ProfDRV quality standards provide a proposal for this: <http://www.project-profdrv.eu/index.php?id=255> as well.



3.2. Other comments

In the final section of the questionnaire you have the opportunity to comment on any other aspect of the Directive, which has not been covered by the previous questions, but which you deem relevant in the course of a reflection on a review of the Directive.

28. Are there any other aspects of the Directive you would like to comment on?

Generally it can be said that there is an urgent need for further research with regard to professional drivers' vocational education and training in general. This applies equally to topics such as the shortage of professional drivers, its reasons, its characteristics and possible activities to address it, the sustainable integration of multimedia-/technology-based learning into professional driver qualification, the impact of different kinds of professional driver qualifications on the driver shortage and road safety, etc.. Research and development results on these topics (especially with a European scope) do not exist here but are urgently necessary in order to make a real change within professional driver qualification in Europe with regard to a further professionalization of the occupation and to its impact on road safety.

It can, therefore, only be recommended to investigate urgently into more research and development activities and projects with players who can provide the relevant expertise and European network in all the necessary fields: transport, vocational education and training, education policy and research in order to develop solutions that are sustainable.

The ProfDRV and ICT-DRV partnerships around its coordinator DEKRA Akademie GmbH (DE) and their European networks of major stakeholders provide this special set of expertise. The questions in the questionnaire above prove the indispensability of an interdisciplinary approach in order to tackle this overall topic. The questions touch different disciplines that require high levels of expertise in order to be addressed properly and that are – as our project work clearly shows – rarely available in combination. This applies especially to European vocational education and training instruments such as EQF, ECVET and the learning outcomes approach in combination with professional driver training.

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