

Revision of the EU Driving Licence Directive

The German Bus and Coach Operators' Association (bdo) is the umbrella organisation of the private bus and coach industry in Germany. The bdo represents the interests of more than 3,000 companies on the national as well as on the EU-level. The association's members are active in local public transport, occasional services and long-distance coach services.

I. Serious shortage of bus drivers

There is a serious shortage of drivers throughout the EU. In Germany alone, there will be a shortage of around 87,000 bus drivers by 2030. The reasons are increasing age-related staff retirement, the growing need for personnel for the urgently required strengthening of public transport and the challenging recruitment of young talent.

The main causes of the shortage of young drivers are the duration and cost of training as well as language barriers. Reforms are essential. The bdo has developed a package of measures with proposed solutions. Our association as well as our colleagues at the other EU bus and coach associations are advocating for an adjustment of minimum age regulations and the possibility to get a driving licence also in other EU-member states than the country of residence.

II. Necessary adjustments to the draft EU Driving Licence Directive

The draft revision of the European Driving Licence Directive presented at the beginning of March 2023 does not provide for any improvement for the bus and coach sector and will offer no remedy for the dramatic driver shortage. The following adjustments are urgently needed:

- **Adjustment of the minimum age regulations (21 years / 18 years)**

With the current minimum age requirements in place, bus drivers can only operate all kinds of bus and coach services at the age of 23. However, potential candidates usually leave school at the age of 16. Younger drivers are only allowed to drive without passengers, only with small buses of class D1 or max. 50 kilometres in regular services – not in occasional services. Most companies (at least in Germany) are active in public transport as well as occasional services. In order to increase the attractiveness of the profession and to widen the range of possible applications for prospective drivers, unrestricted driving must be possible from the following age:

 - 21 years with an accelerated Certificate of Professional Competence (CPC)
 - 18 years with vocational training
- **Abolition of the residence principle**

Mobility in education is possible throughout the EU – but not in bus driving training. Students living in German Kehl, for example, can study medicine in French Strasbourg without any restrictions. Potential bus drivers, however, are only allowed to obtain their bus driver's licence in their country of residence. "Freedom of Training" often makes sense as it saves time and money, reduces bureaucracy or circumvents language barriers. For example, Polish citizens living in Frankfurt (Oder) could take the bus driver's licence in Poland in their mother tongue. The current situation where you have to acquire the driving license in your country of residence contradicts all principles of the EU internal market. It must be possible to obtain driving licences in all EU states and not only where you are permanently living. Mobility would make it easier for foreigners to obtain driving licences and offer alternatives to the very high driving licence costs in some Member States. EU law continues to guarantee the high, uniform EU training standard.
- **Adjustment of capacity for category D1**

Class D1 licence holders are allowed to drive buses up to 8m long and carry up to 16 passengers. However, the corresponding buses offer more capacity than for 16 passengers. In order to make flexible use of the permissible vehicle weight with seats, standing rooms and luggage and to consider the different purposes of use, the specification for class D1 must on the one hand prescribe the number of seats instead of the number of passengers and on the other hand allow 22 seats instead of 16.

III. Textual amendments required to the proposal for a directive 2023/0053 (COD)

1. Adjustment of the minimum age regulations (21 years / 18 years)

- Article 7(1)(e) to be amended as follows:

21 years for categories D and DE.

- Article 7 para. 5 b) and c) shall be worded as follows:

b) 18 years for categories D1, D1E, D and DE if the applicant obtains the certificate of competence through vocational training ~~for categories D1 and D1E, the minimum age provided for in Article 5(3) point (a)(i), second subparagraph, of that Directive;~~

c) 21 years for categories D1, D1E, D and DE ~~for categories D and DE, the minimum ages provided for in Article 5(3) point (a)(i) first subparagraph, Article 5(3) point (a) and (b), of that Directive.~~

2. Abolition of the residence principle

- Article 10 para. 1 e) is to be deleted:

~~e) they have their normal residence in the territory of the Member State issuing the licence, or can produce evidence that they have been studying there for at least six months.~~

3. Adjustment of capacity for category D1

- Article 6 para. 1 c) viii) is to be deleted:

~~motor vehicles designed and constructed for the carriage of 22 seats no more than 16 passengers in addition to the driver and with a maximum length not exceeding 8 meters. – motor vehicles in this category may be combined with a trailer having a maximum authorised mass not exceeding 750 kg;~~

Berlin, 17 May 2023