

MAY 2017

POSITION PAPER PRISE DE POSITION STELLUNGNAHME OF THE INTERNATIONAL ASSOCIATION OF PUBLIC TRANSPORT

DE L'UNION INTERNATIONALE DES TRANSPORTS PUBLICS
DER INTERNATIONALE VERBAND FÜR ÖFFENTLICHES VERKEHRSWESEN

PROPOSAL FOR A DIRECTIVE OF THE EUROPEAN PARLIAMENT AND THE COUNCIL AMENDING DIRECTIVE 2003/59/EC ON THE INITIAL QUALIFICATION AND PERIODIC TRAINING OF DRIVERS OF CERTAIN ROAD VEHICLES FOR THE CARRIAGE OF GOODS OF PASSENGERS AND DIRECTIVE 2006/126/EC ON DRIVING LICENCES (COM(2017)47 FINAL)

UITP is the International public transport association, present in 96 countries worldwide. In the European Union UITP brings together more than 400 urban, suburban and regional public transport operators and authorities from all member states. It represents the perspective of short distance passenger transport services by all modes: bus, regional and suburban rail, light rail and tram and waterborne. These services are often organised in integrated public transport networks covering metropolitan areas and other specific territories.

Key facts for public transport in the EU 28

Passenger journeys: 57 billion/year, more or less equally shared between road modes (mainly bus) and rail modes (urban, suburban and regional rail).

Economic value of public transport services: € 130 - 150 billion/year or 1 - 1.2% of GDP.

Employment: direct employment 1.2 million and indirect employment 2 - 2.5 indirect jobs for each direct job on average.



The public transport operators represented by UITP are convinced that well-trained staff and customer-focused operations are essential to providing the kind of quality of service needed for public transport systems to offer a reliable and attractive mobility choice.

UITP therefore welcomes the proposal of the EU Commission and in particular

- the integration of road safety related subjects in the periodic training,
- the focus on fuel efficient driving (eco-training),
- the inclusion of disability awareness in the list of training subjects and
- the possibility to use ICT tools such as e-learning for the training.

Nevertheless, it is crucial for the sector to allow the training centres flexible handling of the subjects. In addition, a specific content retake of training modules should be possible.

Specific remarks:

Article 2 (c):

(c) vehicles undergoing road tests for technical development, repair or maintenance purposes, or of new or rebuild vehicles which have not yet been put into service, **or of vehicles without passengers driven back to and/or out of their depot by maintenance personnel;**

Motivation: As it is the case for

- *“vehicles used for non-commercial carriage of passengers or goods, for personal use”* (Article 2 (f)) or
- *“vehicles carrying material or equipment to be used by the driver in the course of his or her work, provided that driving the vehicle is not driver’s principal activity”* (Article 2 (g))

The directive should not apply when maintenance agents occasionally bring the vehicles back to the depot, for example in the event of a breakdown.

Article 2 (e):

(e) vehicles used for driving instruction and examination for any person wishing to obtain a driving licence or a CPC, in accordance with Article 6 and Article 8(1), ~~provided that they are not being used for the commercial carriage of goods and passengers;~~"

Motivation: Most of the approved training centres separate driving trainings from commercial transport operations. Nevertheless, under certain circumstances, especially practical customer service training, it could be appropriate to train in real transport operation. Modern education and competence theories attribute training on the job more efficiency and deeper learning success.

The members of UITP therefore propose to keep the wording of Article 2 (e) of Directive 2003/59/EC unchanged.

Annex 1 - Section 4: Compulsory periodic training provided for in point (b) of Article 3(1)

Compulsory periodic training courses must be organised by an approved training centre. Their duration must be of 35 hours every five years, given in periods of at least seven hours **which may be split over more than one day**. Such periodic training may be provided, in part, on top-of-the-range simulators and by use of information and communication technology tools such as e-learning, while ensuring the quality of the training. At least one of the seven hour periods shall cover a road safety related subject. The content of the training shall take into account training needs specific to the transport operations carried out by the driver and relevant legal and technological developments. ~~The seven hour periods shall cover different subjects.~~

Completed specific training as required under other Union legislation may count as one of the seven hour periods. This includes, but is not restricted to, training required under Directive 2008/68/EC for driving of dangerous goods, training on animal transport under Regulation (EC) 1/2005, and for the carriage of passengers training on disability awareness under Regulation (EU) 181/2011."

Motivation: The use of e-learning would be impossible if the seven hours cannot be split. In addition, learning is more efficient if it is given in shorter "blocks", for example 3 hours theory during one day followed by 4 hours practice during another day.

The ban on repeating topics within the five year framework of the periodic training is too strict. Somebody might benefit from a repeat of a module because they have not fully understood it. There could be technical /legal / social developments that make it appropriate to revisit a topic.
