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COMMISSION STAFF WORKING DOCUMENT

EVALUATION

of the

Directive 2006/126/EC of the European Parliament and of the Council of 20 December 2006 on driving licences

{SWD(2022) 18 final}

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Glossary

Term or acronym	*Meaning or definition*
ACEM	Association des Constructeurs Européens de Motocycles (European Association of Motorcycle Manufacturers)
BVF	Bundesvereinigung der Fahrlehrerverbände e.V. (Federal association of driving instructors' associations (in Germany))
CIECA	Commission Internationale des Examens de Conduite Automobile (International Commission for Driver Testing)
EFA	Europäische Fahrlehrer-Assoziation (European Driving School Association)
EEA	European Economic Area (Iceland, Liechtenstein and Norway)
EReg	Association of European Vehicle and Driver Registration Authorities
ETF	European Transport Workers' Federation
ETSC	European Transport Safety Council
FEMA	Federation of European Motorcyclists' Associations
FIA	Fédération Internationale de l'Automobile (International Automobile Federation)
FIM	Fédération Internationale de Motocyclisme (International Motorcycling Federation)
GDLD	Get Driving Licence Details (in RESPER)
IFMC	International Federation Motorhome Clubs
IRU	International Road Transport Union
OECD	Organisation for Economic Co-operation and Development
PTW	powered two wheeler
RESPER	Réseau permis de conduire (EU driving licence network)
STR	Sveriges Trafikutbildares Riksförbund (Swedish National Association of Driver Educators)
SWOV	Stichting Wetenschappelijk Onderzoek Verkeersveiligheid ((Dutch) Institute for Road Safety Research)
UETR	Union Européenne des Transporteurs Routiers (European Road Haulers Association)

1. INTRODUCTION

This report presents the findings of the **ex-post evaluation** of **Directive 2006/126/EC** of the European Parliament and of the Council of 20 December 2006 on driving licences.

The EU rules on driving licences were progressively set up through three directives. The first directive[1] was introduced in December 1980, followed by the second directive[2] of July 1991. Directive 2006/126/EC on driving licences[3], also known as the third driving licence directive (hereafter 'the directive'), was adopted in December 2006. It has meanwhile been amended ten times, mainly to take into account scientific and technical progress.

The directive was gradually applicable over time with some provisions being applicable as per 19 January 2009[4], while the key provisions were only applicable after full transposition as per 19 January 2013[5].

The directive aims at harmonising the rules on driving licences in order to improve road safety, to facilitate the freedom of movement for citizens moving inside the Union, and to reduce the possibility of fraud.

1.1 Purpose and scope of this evaluation

As more than 12 years have passed since Member States started applying the provisions contained in the directive, it was considered timely to assess how well it has performed relative to original expectations. The purpose of the evaluation is an assessment of the performance of all substantive provisions (Articles 1 to 15) of the directive across the European Union.

The **evaluation period** spans from 2006, when the current directive was adopted, until 2018.

Geographical scope - The evaluation covers the full geographical scope of the directive and assesses its effects in all Member States and the United Kingdom.

Furthermore, national authorities from Iceland and Norway also provided responses to the questionnaire.

The evaluation follows the Commission's Better Regulation Guidelines. Accordingly, the analysis is structured around the evaluation criteria of effectiveness, efficiency, relevance, coherence and EU added value.

- **Effectiveness,** i.e. the evaluation assesses the actual changes the directive has generated, particularly in view of its original objectives. In this context, the evaluation also examines how Member States have implemented the directive and how the situation has evolved since the adoption of the directive;

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1 First Council Directive of 4 December 1980 on the introduction of a Community driving licence (80/1263/EEC), OJ L 375, 31.12.1980, p. 1.

2 Council Directive of 29 July 1991 on driving licences (91/439/EEC), OJ L 237, 24.8.1991, p. 1.

3 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, p. 18.

4 Article 18 of Directive 2006/126/EC

5 Article 16(2) of Directive 2006/126/EC

- **Efficiency,** i.e. it assesses the actual costs and changes relative to the actual benefits the directive has generated. Any potential for simplification and reduction of unnecessary regulatory costs is identified;
- **Relevance,** i.e. it assesses whether the objectives of the directive are still in line with the current needs or problems; how the situation/context as regards the provisions of the directive in the EU has evolved and whether the directive still matches current needs; whether its scope is still fit for purpose and sufficiently able to respond to the evolved needs, given technological developments;
- C**oherence**, i.e. it assesses whether the directive is internally consistent and whether the legislation is consistent with other EU interventions (as well as e-governance initiatives);
- **EU added value**, i.e. it assesses the added value delivered by, or associated with, the implementation of the directive, over and above what reasonably could have been expected from national and regional policies and their implementation.

2. BACKGROUND TO THE INTERVENTION

The first driving licence directive was introduced in December 1980 (Directive 80/1263/EEC). It established the Community model of driving licences and the principle of mutual recognition by Member States of national licences. It has also guaranteed the exchange of driving licences by holders transferring their place of normal residence or place of employment from one Member State to another. It introduced the general principle that driving licences should only be granted to applicants having passed a practical and theoretical test and meeting certain minimum medical standards.

The second directive (91/739/EEC) was introduced in July 1991 and it further harmonised the categories of vehicles requiring different types of driving licences. It also subdivided some of the categories of driving licences in order to promote, in particular, access in gradual stages to the driving of certain vehicles in the interest of road safety. It also created specific provisions making it easier for physically disabled persons to drive. It provided for more detailed harmonisation of the standards for driving tests and licensing. It refined the minimum standards of physical and mental fitness. It has allowed Member States to apply their national provisions on the withdrawal, suspension and cancellation of driving licences to all licence holders having acquired normal residence in their territory. It has also introduced a standard definition of normal residence.

The 2001 White Paper a **'European transport policy for 2010: 'time to decide'**[6] placed users at the heart of transport policy, with the aim of improving road safety for road users. This White Paper acknowledged that, of all modes of transport, transport by road is the most dangerous and most costly in terms of human lives, and set the objective of reducing by 50% the number of deaths until 2010.

The European Commission subsequently adopted in 2003 the **Road Safety Action Programme (2003–2010)**[7] which confirmed the objective of halving the number of road accident victims in the EU by 2010 and proposed a series of measures to improve road user behaviour, addressing in particular data collection and analysis, educational and training aspects, infrastructure and vehicle safety (passive safety measures), post-accident care as well as enforcement.

The third directive (2006/126/EC) was published in December 2006 and also had the clear objective of reducing road fatalities through a set of measures[8] aimed at improving road safety and facilitating the freedom of movement for citizens moving inside the Union.

In 2010, after the publication of the third driving licence directive, the Commission adopted the **policy orientations on road safety 2011-2020**[9] that set a target of halving the number of road

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6 White Paper 'European transport policy for 2010: time to decide', COM (2001) 370 of 12.09.2001.

7 Communication from the Commission on the European Road Safety Action Programme. Halving the number of road accident victims in the European Union by 2010: Aa shared responsibility, COM (2003) 311 final of 2.6.2003.

8 Further detailed in section 2.2.

9 Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 'Towards a European road safety area: policy orientations on road safety 2011-20202020', COM(2010) 389 final of 20.7.2010.

fatalities by 2020 (starting from 2010) and it included a mix of initiatives focusing on improving vehicle safety, the safety of infrastructure and the behaviour of road users.

The 2011 White Paper **'Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system'**[10] further increased the level of ambition in regard to road safety and established that by 2050, the EU would move towards zero fatalities in road safety. It reiterated the objective of halving the number of road casualties by 2020, making the EU a world leader in safety and security in all modes of transport.

Faced with stagnation in the reduction of EU-wide fatality figures in the second half of the last decade, the Commission received a strong mandate for a new road safety programme from the EU Transport Ministers in the "**Valletta Declaration" of 2017**[11].

2.1 Description of the initiative and its objectives

The directive establishes a framework for harmonising the rules on driving licences in order to achieve two general objectives: to improve road safety; and to facilitate the freedom of movement for citizens moving inside the Union.

To do so, it also established the following six specific objectives:

- Reduce, where possible, the administrative burden for drivers, administrations and enforcement authorities
- Establish uniform driving licence rules and requirements
- Reduce the possibilities of driving licence fraud and "driving licence tourism"
- Raise the driving skills of non-professional and professional drivers
- Facilitate the implementation and enforcement of driving licence rules
- To protect novice drivers.

And ten **operational objectives**:

- Establish a single EU driving licence model and ensure its mutual recognition by Member States
- Introduce the standard plastic card with a microchip
- Facilitate the issuance, renewal, exchange and replacement of driving licences when changing residence from one Member State to another
- Harmonise and limit the administrative validity for all new licences
- Harmonise the periodicity of medical checks for professional drivers

[10] White Paper 'Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system', COM(2011) 144 final of 28.3.2011.

[11] See https://eumos.eu/wp-content/uploads/2017/07/Valletta_Declaration_on_Improving_Road_Safety.pdf, later endorsed by the Council (http://data.consilium.europa.eu/doc/document/ST-9994-2017-INIT/en/pdf).

- Enhance the principle of progressive access[12] as regards the most powerful motorcycles
- Harmonise the initial qualification and periodic training of driving examiners
- Establish the principle of a single driving licence per person (1 holder, 1 licence)
- Foster cooperation between Member States by establishing the EU driving licence network (RESPER)
- Introduce a driving licence category for mopeds.

The key measures through which the directive aims to achieve its objectives are a number of provisions imposing obligations on Member States to implement the directive according to the specific provisions mentioned in Table 1 (given in Annex 5 below).

- The **intervention logic** in **Annex 4** summarises the links and causal relationships between the problems and needs. It takes into consideration external factors such as technological and policy developments, the general, specific and operational objectives that the legislative framework was designed to address, and the specific actions for addressing those problems and needs, as well as expected outputs, results and impacts.

2.2 Baseline and points of comparison

The baseline scenario is defined around the two general objectives of the directive – increasing road safety and the free movement of citizens – and is a projection of what would have happened without the adoption and implementation of any driving licence directive from 2006 until 2018 (the "no directive" scenario).

To do so, the baseline represents – whenever data is available – the situation as it would have evolved from the period before the first driving licence directive was introduced in the Member States in 1983, until 2018. The reason to take into consideration the three directives is to allow the identification and quantification, wherever possible, of the full effects of the current directive compared to a scenario where no directives would have existed (baseline), rather than being compared to the period before the current directive's immediate introduction (when the second directive was in force and whose effects would be mixed with those of the current third directive). This approach has been taken because each revision of the driving licence directive has kept at least some provisions from the previous legal framework.

The baseline scenario includes the relevant legal and socio-economic developments from 2006 until 2018 (such as Directive 2003/59/EC[13] on the initial qualification and period training of truck and bus drivers, which applied in full from September 2009, and Directive 2008/96/EC[14]

[12] 'Progressive access' means that someone wishing to get alicence for a more powerful motorcycle will have to wait for two years after having passed the initial motorcycle test and then re-takes the test on the bigger motorcycle. Persons of a certain minimum age can be exempted from having to fulfil this requirement. For instance Article 4 (3) c) i) of the directive states that "*The minimum age for category A is fixed at 20 years. However, access to the driving of motorcycles of this category shall be subject to a minimum of two years' experience on motorcycles under an A2 licence. This requirement as to previous experience may be waived if the candidate is at least 24 years".*

[13] OJ L 226, 10.9.2003, p. 4.

[14] OJ L 319, 29.11.2008, p. 59.

on road infrastructure safety management, as well as technological developments, demographic trends, shift in transport volumes, vehicle fleets and GDP).

It is likely that in the absence the driving licence directives, Member States, besides being signatories of the Geneva Convention on Road Traffic[15] and the Vienna Convention on Road Traffic[16], would also have regulated driving licence rules at international level through Bilateral Agreements[17], Memoranda of Understanding or possibly regional agreements.

Member States would also likely have further developed national rules with different levels of requirements and ambition, thereby possibly achieving a lesser level of integration in terms of free movement and road safety, due to a lack of harmonisation and more difficult and lengthy mutual recognition processes of driving licences.

Driver behaviour would possibly not have been improved across the European Union to the same extent and pace without the directives, which introduced the principle of a single driving licence (reducing the possibilities of driving licence fraud and "driving licence tourism").

The same goes for skills. In particular, the provisions regarding the minimum standards for driving examiners, the minimum and harmonised training obligations for novice drivers and for riders of powered two-wheelers would not have been in place without a common EU framework, and the combined effect of a plethora of bilateral agreements and the scattered national legislative actions would probably not have reached the same level of results.

Achieving similar results without the directives would have required significant coordination among Member States but most likely this would not have resulted in a single driving licence, hence this would have affected the free movement of people.

Road safety

In terms of road safety, the baseline scenario assumes that the trends in road accident fatalities prior to the introduction of the directives in each Member State would have continued had there been no directive in force.[18]

Based on this assumption, Member States that implemented the three driving licence directives from 1983 until 2018 (blue line given in Figure 1 in Annex 5) have experienced a more pronounced reduction in their road accident fatality figures than countries that had not implemented the directive (orange and yellow lines).

According to the statistical analysis[19], the third driving licence directive may have had the direct effect of reducing by approximately 7% the number of road accident fatalities between

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[15] United Nations Convention on Road Traffic Geneva, 19 September 1949- https://treaties.un.org/Pages/ViewDetailsV.aspx?src=TREATY&mtdsg_no=XI-B-1&chapter=11&Temp=mtdsg5&clang=_en

[16] United Nations Convention on Road Traffic Vienna, 8 November 1968 https://treaties.un.org/pages/ViewDetailsIII.aspx?src=TREATY&mtdsg_no=XI-B-19&chapter=11

[17] Bilateral Agreements (BAs) are concluded between Member States in written form and governed by European and/or international law. BAs create legally binding rights and obligations.

[18] However, a significant limitation is that the only road safety dataset available for years prior to 1983 contains only total fatality figures, which makes defining the baseline scenario analysis a difficult task.

[19] The statistical analysis was performed through a general linear mixed model (GLMM), with total road accident fatalities as a dependent variable. In order to fully exploit the database, the following variables were assumed to directly affect total fatalities and were selected to be included as independent variables in the model: Gross Domestic Product (GDP) per capita (in logarithmic form), the 2nd driving licence

2013 and 2018. It is therefore concluded that in the absence of the third driving licence directive, it is likely that there would have been approximately 7% more road accident fatalities in the EU during this period. The same analysis indicates that without the second driving licence directive, fatality rates would have likely been higher by approximately 4% overall. Due to data limitations, the analysis was unable to establish the effect of the first directive, thus the baseline without any directive in place is restricted by this limitation.

Free movement

Free movement of persons is supported by several EU policies adopted gradually over several years, such as the Schengen agreements[20] and Directive 2004/38/EC[21] on the right of citizens and their family members to move and reside freely within the territory of the Member States, and also several other EU sectoral policies.

No data is available to develop an analysis of a baseline and therefore it is difficult to assess what would have happened if no driving licence directive had entered into force. In addition, the stakeholder consultation activities did not provide quantitative data to include in this analysis.

In the absence of a European framework, the UN conventions on road traffic[22] would have applied for the mutual recognition of driving licences when a driver travelled for professional or recreational purposes. In that context, drivers would need to hold an International Driving Permit (Annex 7 to the Vienna Convention, Annex 10 to the Geneva Convention) in the event that the Member State of issuance has not used the harmonised template for a domestic driving licence (Annex 6 to the Vienna Convention, Annex 9 to the Geneva Convention). Although no data is available, it can be reasonably assumed that the administrative procedures required to obtain such a document would probably have resulted in some additional costs for the citizens travelling within the European Union.

For citizens moving to other countries and taking up their normal residence there, it is reasonable to presume that, if no directive had been in place, Member States may well have entered into bilateral agreements with neighbouring countries, or countries from the same region, regarding the mutual recognition, exchange, renewal or replacement of driving licences. As a result, however, driving licence rules would likely not have been harmonised to the same extent and at the same pace, entailing a higher administrative burden and higher costs for citizens.

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directive and the 3rd driving licence directive and the directives on professional driver training and on infrastructure safety management (2003/59/EC and 2008/96/EC). The coefficients of the variables state the elasticity and the unique effect of each variable on total fatalities. The reference for extracting the impact of the 2nd and 3rd directive was the situation prior to the 2nd driving licence directive (1st driving licence directive and no driving licence directive combined) due to limited data prior to the 1st driving licence directive. The random effects capture country-level characteristics such as infrastructure, education, enforcement, etc. Robustness of the GLMM model was tested (apart from the Akaike criterion of the model): observed versus predicted values were extracted and t-tests before and after were also made. Overall, the GLMM technique is considered to be the most appropriate for this kind of panel data. The aim of the model was to identify the effect of the driving licence directives on road safety outcomes in the EU countries. In order to obtain more robust results, two control variables (directly and indirectly related to exposure), which have a significant impact on road safety outcomes based on the literature findings, were chosen. This is a usual technique in time series and panel data analysis. Please see Annex 3 for details.

[20] The Agreement of 14 June 1985 (OJ L 239, 22.9.2000, p. 13), and the Convention implementing the Schengen Agreement, which was signed on 19 June 1990 and entered into force on 26 March 1995 (OJ L 239, 22.9.2000, p. 19).

[21] OJ L 158, 30.4.2004, p. 77.

[22] Please see footnotes 15 and 16 above.

The existence of a single Community Model of driving licence and the harmonised validity periods significantly facilitated the exchange, renewal and replacement of driving licences in the case of change of residence, compared to the situation before the directive, when more than 110 different driving licence models existed in Europe with different entitlements and validity periods, making the equivalence and recognition decisions more complex. Without the directive in place, different driving licence models would most likely have remained. The different legal regimes with different validity periods and requirements on medical checks would have likely created an obstacle to free movement.

The administrative burden for Member States would be higher compared to the present conditions, as RESPER greatly facilitates the contacts between competent authorities in the cases of first issuance, renewal, and replacement. Drivers would have been impacted by the absence of RESPER, first because of the delays that would have resulted from bilateral inquiries among Member States. In addition, Member States could also have required citizens to prove directly their right to drive, for instance by requesting official certificates in the country of first issuance which would have had to be translated and officially recognised, tasks that can become extremely burdensome when the holder of the right to drive lives in a country other than the one of first issuance.

3. IMPLEMENTATION/STATE OF PLAY

Directive 2006/126/EC replaced and repealed Directive 91/439/EEC by incorporating in a single text both the substantive amendments and the unchanged provisions thereof.

The transposition deadline of the directive was 19 January 2013 and **all Member States transposed the directive into national legislation**. However, the implementation of the directive by Member States has been subject to several infringement procedures (see section 3.2).

The directive has been subject to 10 amendments after entry into force, mainly to take into account the scientific and technical progress.

3.1 The main novelties introduced by the directive

The main novelties introduced by the directive were the following:

The Union model licence with advanced anti-forgery measures (Articles 1 and 3)

The introduction of the new Union model licence was one of the changes brought about by the directive and was introduced by Article 1 of the directive (and Annex I thereto). The new Union model licence, based on an ISO standard, has been very quickly implemented by many Member States after the adoption of the directive and even before its entry into force[23]. The new Union model did not bring about significant changes in the organisation of the licensing system. While most European citizens are required to visit a public administration office to apply for a driving licence, some Member States offer this service on a web platform.

Modifications of driving licence categories (Articles 4 and 6)

The directive introduced the EU category AM for mopeds. According to the implementation study[24], Member States used this introduction as an opportunity to strengthen their licensing requirements for riding a moped, some Member States introduced a practical test, others introduced theoretical training, or practical training on top of the mandatory theoretical test.

One of the biggest changes introduced by the directive was the graduated access system for motorcycles, which **was implemented by all Member States**. The options provided by the directive led to a large variation in access requirements, more so than the minimum age.

Harmonised administrative validity periods, the rule of one single driving licence per person and medical checks (Article 7)

Another novelty, introduced by Article 7 of the directive, were the harmonised administrative validity periods for all driving licence categories. The introduction of harmonised

[23] 'The implementation of Directive 2006/126/EC on driving licences – Final report', drafted by Hasselt University, National Technical University of Athens, Austrian Road Safety Board (Kuratorium für Verkehrssicherheit) and European Transport Safety Council: http://publications.europa.eu/resource/cellar/bbd8141d-e603-11e7-9749-01aa75ed71a1.0001.01/DOC_1

administration validity periods aimed at reducing fraud by allowing regular updates of the security features, facilitate freedom of movement of EU citizens and improve road safety by introducing mandatory medical checks upon renewal for holders of licences C and D and allowing Member States to introduce regular medical checks for licences A and B.

Article 7 also introduced the principle that one holder should not be allowed to have more than one driving licence.

Finally it also introduced the obligation to issue driving licences only to those having passed a test of skill and behaviour and a theoretical test and having normal residence in the Member State that issues the driving licence.

Harmonised rules on driving examiners (Article 10 and Annex IV)

The directive introduced a set of standards for the training and education of driving examiners. Annex IV to the directive contains minimum standards for driving examiners, including on initial qualification and periodic training.

According to the implementation study, prior to the directive, driving examiners in some EU countries had almost no specific education or did not even hold the driving licence for the category that they were examining.

EU driving licence network (RESPER) (Article 15)

The directive created an EU network for the exchange of driving licence information (**RESPER**). This network acts as an EU-wide hub for information exchange between the Members States' driving licence issuing authorities. All Member States have connected to RESPER and are obliged to use it. The main goals of this platform are to ensure the 'one person one licence' principle, to ensure that drivers only drive vehicles in categories they are qualified for and to assist Member States in combating fraud by allowing them to verify the validity of licences issued by other countries.

3.2 Infringements related to the implementation of Directive 2006/126/EC

The implementation of the directive by Member States has been subject to twenty-four infringement procedures for bad application of EU law. Twenty two of those are closed and two are still open.

There were eighteen infringement procedures due to non-conformity (all but one[25] closed due to corrective measures undertaken by Members States[26]) and one for bad application of EU law (that is still open[27]).

[25] CZ, on Commission Directive (EU) 2016/1106.

[26] 14 in connection with Directive 2006/126/EC and 3 in connection with Commission Directive (EU) 2015/653.

3.3 Infringements related to the non-communication of the transposition of Directive 2006/126/EC and its amending acts.

Directive 2006/126/EC had twenty infringement cases related to non-communication that are all closed due to appropriate action taken by Member States.
Directive 2009/113/EC had sixteen infringement cases related to non-communication that are all closed due to appropriate action taken by Member States.
Directive 2011/94/EU had eleven infringement cases related to non-communication that are all closed due to appropriate action taken by Member States.
The **Directive 2012/36/EU** had eleven infringement cases related to non-communication that are all closed due to appropriate action taken by Member States.
The **Directive 2014/85/EU**[28] has been subject to eleven infringements for late transposition[29], all currently closed due to appropriate action taken by Member States.
Directive (EU) 2015/653[30] has been subject to four infringements for late transposition[31] also all currently closed due to appropriate action taken by Member States.
Directive (EU) 2016/1106[32] has been subject to seven infringements. Seven of those were closed due to appropriate action taken by Member States. One is still open.[33]
Directive (EU) 2018/645[34] amended directives 2003/59/EC (Article 1) and 2006/126/EC (Article 2). The deadline for transposition of most provisions, including all of Article 2, was 23 May 2020. It has been subject to sixteen infringements in relation to non-communication. Six infringement procedures are still open.
Directive (EU) 2020/612[35] was to be transposed into national law by 1 November 2020. It has been subject to 5 infringements for non-communication (all currently closed due to appropriate action taken by Member States).

3.4 Judgments of the Court of Justice of the European Union

The Court of Justice of the European Union has given several judgments[36] in direct relation to Directive 2006/126/EC, covering areas like for instance: the criteria for the establishment of normal residence[37], the mutual recognition of driving licences in relation to driving disqualifications and change of normal residence[38], the conformity of medical fitness standards

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27 BE, on preconditions required for the exchange of driving licences issued in another Member State that are considered in breach of the Union's law (INFR 2017/4071; see also under point 5 here: https://ec.europa.eu/commission/presscorner/detail/EN/INF_20_2142).

28 It updated some aspects of Annex II concerning minimum requirements for driving tests and added some provisions on 'neurological diseases' and on 'obstructive sleep apnoea syndrome' in point 11 of Annex III.

29 The deadline for transposition was 31 December 2015.

30 It updated Annex I (list of harmonised driving licence codes).

31 The deadline for transposition was 1 January 2017.

32 It updated Annex III on the points related to cardiovascular diseases and diabetes mellitus.

33 CZ

34 It updated Article 4 (minimum age for categories C, C1, C1E, CE, D, D1, D1E and DE and a new regime on minimum age in relation to the certificate of professional competence), Article 6 (possible extension of validity of category B licence for use within a Member State's territory of vehicles with a maximum mass up to 4250 kg where mass in excess of 3500 kg is solely due weight of propulsion system for alternative fuels) and Article 15 (on the use of the driving licence network RESPER).

35 It updated Annex II (the regime on automatic/manual transmission and the requirement on category A2 vehicles for test).

36 Please see list of judgments in Table 6 of Annex 5.

37 C-664/13 (ECLI:EU:C:2015:417)

38 C-224/10 (ECLI:EU:C:2011:655), C-419/10 (ECLI:EU:C:2012:240), C-467/10 (ECLI:EU:C:2012:112), C-260/13(ECLI:EU:C:2015:257), C-339/14 (ECLI:EU:C:2015:333), C-9/18 (ECLI:EU:C:2019:148) and C-112/19 (ECLI:EU:C:2020:864).

with the Charter of Fundamental Rights[39], the recognition of certificates not meeting the requirements of the Union model driving licence[40], the entitlement to drive granted before 19 January 2013[41], and failure of a Member State to fulfil its obligations under the directive.[42]

The court rulings with particular importance from an evaluation perspective were those on normal residence (Article 12 of the directive) and on the cross-border effects of driving disqualifications, in particular the impact on mutual recognition of driving licences (Article 11 of the directive), because they show that those provisions are not optimal in terms of their coherence (as will be elaborated in more detail in Section 5 below). The evaluation has shown that the modalities of application of Article 12 of the directive need to be clarified, and that Article 11, in relation to the cross-border effects of driving disqualifications, lacks effectiveness.

[39] C-356/12 (ECLI:EU:C:2014:350).

[40] C-195/16 (ECLI:EU:C:2017:815)

[41] C-632/15 (ECLI:EU:C:2017:303)

[42] C-195/16 (ECLI:EU:C:2017:815)

4. METHOD

4.1 Methodology and sources of information

The evaluation started in August 2019 and followed the Commission's Better Regulation Guidelines.[43] An Inter-Service Steering Group (ISSG) provided advice and monitored the progress of the exercise. Being composed of members from different Commission services and having the necessary mix of knowledge and experience, the ISSG brought together a range of different perspectives and provided the necessary input, on road safety and free movement.

A support study was carried out by an external contractor to provide input to this evaluation.[44] In accordance with the Terms of Reference, the study was structured along seven tasks, as depicted in the Figure 2 of Annex 5.

The methods and tools used for the evaluation are summarised in the following paragraphs.

The analysis was structured according to an **evaluation matrix**, presented in Annex 4. This matrix operationalised a set of evaluation questions and sub-questions, indicators and judgement criteria that would be used to answer them. It was developed on the basis of an in-depth understanding of the directive's intervention logic, taking in consideration what it aimed to achieve and how, as presented in Section 2.1 and in Annex 4.

Review of legislative documents and reports

In order to instruct the evaluation with factual information, desk research on several related issues was carried out. The aim of the desk research was to collect, organise and analyse relevant information from relevant secondary sources. This included statistical data, legislative documents, and relevant reports and studies, with the intention of collecting both quantitative and qualitative evidence to complement the primary evidence collected through field research.

Field research

The field research consisted of an open public consultation and a range of targeted consultation activities detailed in Annex 2. Nine stakeholder groups were consulted in the context of the study, by the following means:

A targeted survey was launched on 31 August and was open until 11 December 2020. It was targeted to a range of different stakeholder groups, including national competent authorities, but also all different relevant industry sectors, associative stakeholders representing road safety and road users associations, drivers' school associations, drivers' associations, automotive and motorcycle federations, international road transport associations and vehicle manufacturer associations. The survey included questions on the effectiveness, relevance, and EU added

[43] https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en

[44] Support Study to the ex-post evaluation of Directive 2006/126/EC on Driving Licences (Specific Contract MOVE/C2/2019-534/SI2.826438 under framework contract MOVE/A3/2017-257) - ISBN: 978-92-76-37815-0.

value of Directive 2006/126/EC. The questionnaire for national authorities was answered by national authorities covering all Member States except one. Two national authorities from EEA countries[45] and Switzerland also provided responses to the questionnaire. The questionnaire for non-governmental stakeholders was answered by 41 participants.

Targeted interviews aimed to complement the questionnaires by collecting more details on why stakeholders hold certain opinions, as well as gathering additional evidence in relation to evaluation questions for which qualitative data was judged to be an important source. A total of 40 interviews were planned, out of which 29 were effectively carried out with a sample of key stakeholders per main stakeholder type. The interviews included 9 representatives of national authorities, 13 non-governmental stakeholders (associations and other organisations) and 2 representatives from the European Commission.

A stakeholder workshop was organised with competent authorities on 16 October 2020, aimed at the validation and discussion of preliminary findings with the stakeholder community. 66 participants attended, including representatives from driving licence authorities, transport safety associations, road user associations, driving school associations, automotive associations and a motorcycle federation.

An open public consultation[46] was held from 28 October 2020 until 20 January 2021. The consultation specifically related to the relevance, effectiveness, coherence, efficiency and EU added value of the directive. A total of 546 responses were received.

Three case studies were carried out 1) on the methodology for establishing a link between the directive and its effects on road safety and free movement of citizens, and quantifying those effects 2) on digital driving licences and 3) on accompanied driving.

The data collected was used to respond to the evaluation questions. All the analytical findings constitute the basis for the assessment on how the directive has scored on the evaluation criteria. Each of these criteria was addressed through evaluation questions, as presented in the evaluation question matrix presented in Annex 4.

4.2 Limitations and robustness of findings

Even though the evaluation was designed to ensure the robustness of the evidence supporting its findings, limitations to the robustness of certain conclusions were identified while conducting the analysis and are inherent to this type of exercise.

Limitations related to the COVID-19 crisis

From a process point of view, the implementation of the ex-post evaluation has been affected by COVID-19 lockdown restrictions, especially for what concerns the consultation of stakeholders.

[45] Iceland and Norway

[46] The open public consultation was organised by the European Commission and consisted of an online questionnaire published on a dedicated Commission webpage. It was accessible to the general public and any person interested in the topic could submit a contribution.

From a content point of view, the core analysis of the effect on road safety covers the period 2006 up to 2018. Thus, the study does not factor in recent socio-economic developments, specifically in the wake of the COVID-19 pandemic that had an unprecedented impact on transport and mobility of European citizens, bringing travel largely to a standstill for several months. Unprecedented reductions in traffic volumes have been reported across Europe since confinement measures associated with the COVID-19 pandemic were introduced.[47] This reduction did however not lead to a sustained reduction in road fatalities and, in some countries, no reductions at all because some drivers increased speed.

Limitations concerning the stakeholder consultation

A key source of information were stakeholder consultation activities. Several challenges were encountered in the collection of data from stakeholders, but mitigation actions were taken. Some key limitations related to the stakeholder consultation include the engagement of stakeholders, particularly due to the COVID-19 lockdown restrictions.

Firstly, surveys collect self-reported information from stakeholders. Therefore, this information may be influenced by the interests of each stakeholder or group of stakeholders, or it may be inconsistently reported across different groups. To address these shortcomings, information was triangulated to the extent possible from different sources (consultation activities, data analysis, legal and literature research).

For the targeted survey[48] with the non-governmental authorities, 41 responses were received and covered several stakeholder groups. Given the relatively limited number of responses, the findings from the survey of non-governmental authorities are not considered representative enough of the full population of non-governmental stakeholders that are affected by the directive.

For the open public consultation, a total of 546 responses were received, with a large proportion of these coming from the Netherlands (313). As presented in Annex 4, this is interpreted as a possible result of coordinated action of certain categories of stakeholders. To overcome this limitation, the evaluation presents in a transparent manner the data sources and the findings, and highlights questions where there was a high proportion of stakeholders answering in the same or similar manner.

Limitations concerning data availability

Firstly, it should be underlined that there is no obligation of reporting applicable to the Member States. In that context, unlike other policy areas subject to an obligation of reporting, there is no initial set of data available for the analysis. Therefore, most of the analysis in this evaluation is based on stakeholder-reported views.

[47] https://etsc.eu/pin-briefing-the-impact-of-covid-19-lockdowns-on-road-deaths-in-april-2020/ https://etsc.eu/pin-briefing-the-impact-of-covid-19-lockdowns-on-road-deaths-in-april-2020/

[48] According to task 3 of the field research. Please see Figure 4 Support Study Methodology Structure

The evaluation takes place 40 years after the implementation of the first driving licence directive and 15 years after the current directive was adopted. This long timespan has important implications in terms of data availability for defining the baseline scenario, which gives rise to limitations in terms of the measurability of effects, outcomes, results, costs, and benefits arising from the directive. To overcome this lack of data, some assumptions had to be made, relying on desk research, consultation of stakeholders and results of statistical analysis of road safety trends, which strives to ensure that the results are as robust and credible as possible.

Concerning the analysis of the *effect of European driving licence rules on road safety (effectiveness),* statistics on road accident fatalities are available from 1970 until the present but only as total figures. Although providing robust evidence, the statistical modelling has several limitations, since road safety can be affected by many factors beyond the driving licence directives (such as legislative, policy[49], technological and demographic factors). However, not all policies, programmes and actions can be included in statistical models, as they are not specific directives or guidelines that Member States would implement. In order to mitigate this limitation, the effects of such factors on road safety developments were taken into account and statistically estimated[50] together with all other developments not included in the model as separate variables (e.g. vehicle technology, road infrastructure, legislative changes etc.).

Concerning the contribution of the directive to *facilitating free movement across EU for EU citizens* (EQ 1), literature concerning the movement of persons across borders in relation to driving licence rules is very limited and mostly providing qualitative assessments of the extent to which the two are related. Similarly, statistical data on this is not available to monitor and assess the trends over time and the effect of the directive on free movement. This constitutes a key limitation of the analysis. To mitigate this limitation, qualitative evidence was collected through stakeholder consultation to ascertain the perceived effect that the directives had.

Concerning the assessment of the impact of the directive on driving licence tourism and driving licence fraud (EQ 2.3), one key limitation is that there are no consistent statistics on driving licence fraud. The assessment made was essentially qualitative based on interviews and stakeholders' answers to EQ 2.3 in the surveys with national authorities and non-governmental stakeholders.

Concerning the analysis of the effect of the *absence of a common framework on driving' disqualifications on road safety* (EQ 6), data on the frameworks in place in countries that mutually recognise disqualifications was not made available in the data collection processes. Nevertheless, the analysis is still robust to some extent, as it relies on evidence collected through desk research (e.g. analysis of Court of Justice rulings) as well as comprehensive consultation activities.

[49] For instance, the Road Safety Action Programme (2003-2010) (COM(2003) 311), the Communication providing policy orientations on road safety for the period 2011-2020 (COM(2010) 389) and, most recently, the Valetta Declaration of 2017 and the EU Road Safety Policy Framework 2021 -2030 – Next steps towards 'Vision Zero' (SWD(2019) 283).

[50] This was done through the random effects of the model.

The analysis of efficiency (EQ 9 – 11) is relying on data collected via several data collection streams, including desk research and surveys of national authorities. Limitations concerning the analysis concern the lack of availability of data related to the precise costs and the administrative burden associated with the directive. The analysis is essentially quantitative with diverging views between national authorities who consider that the administrative burden and costs been reduced, while citizens do not seem to have perceived that reduction in the costs incurred by them.

5. ANALYSIS AND ANSWERS TO THE EVALUATION QUESTIONS

This section provides the analysis and the results for the five evaluation criteria of effectiveness, efficiency, relevance, coherence, and EU added value.

The findings presented are based on the results from desk research, as well as results obtained through stakeholder consultations.

5.1 Effectiveness

This subsection assesses whether the directive has been effective in achieving the intended objectives (as described in the intervention logic). When analysing the answers to the questions in this section, they were grouped under the heading of the objective to which they relate.

5.1.1 General objectives

5.1.1.1 Enhancing road safety

Relevant questions to assess the effectiveness in reaching this objective:

EQ 1 What have been the effects of the directive in terms of enhancing road safety?

EQ 7 Which factors have contributed to/hindered the achievement of objectives?

The analysis suggests that the directive had a twofold impact on the reduction of road fatalities, a general one across all road users, and a more intense one in specific categories of road users as detailed below. The statistical analysis indicates that the (third) directive may have led to an overall reduction of approximately 7% in the number of fatalities compared to the baseline and to the effect of the first directive.[51]
There is however little evidence – most stakeholder views suggest that road safety has been positively affected by several factors such as protecting young drivers and improving the skills of non-professional drivers. The fulfilment of several operational objectives of the directive is also seen by some stakeholders to have made a positive contribution to road safety, such as the harmonisation of minimum standards for driving examiners including quality assurance and regular periodic training, minimum testing requirements for drivers, medical examinations for professional drivers, minimum age per category, and the progressive access to category A driving licences. On the other hand, the analysis suggests that road safety has been hindered by the absence of an EU framework for the mutual recognition of driving disqualifications.

To answer these evaluation questions, we have based the analysis on road safety data that underwent a statistical analysis (as explained in Annex 3), and also information received from the targeted stakeholder consultation and the Open Public Consultation.

[51] Due to data limitations, the statistical model could not separate the effect of the first directive from the "no directive" baseline for this part of the analysis.

The first key objective of the driving licence directives is to improve road safety, and the obligation to hold a driving licence is a key requirement of all safe road transport systems, implying that drivers acquire the ability and motivation to drive competently and unimpaired. The licensing system is the main method for jurisdictions to meet their obligations to ensure that all drivers are medically fit and able to drive independently, competently, and safely[52].

As mentioned in section 2.1 the directive has introduced several measures aimed at increasing road safety: For instance, professional drivers have to periodically prove compliance with minimum standards of physical and mental fitness for driving (first issuance and renewal of driving licences). The directive also harmonised administrative validity periods[53] and introduced medical checks upon licence renewal for non-professional drivers reaching a certain age.

The directive also enforced the principle of progressive access to the most powerful categories of two-wheeled vehicles and to vehicles used for the transport of passengers and goods. It has also introduced a driving licence category for mopeds targeting in particular the youngest drivers who, according to the statistics, are the most affected category by road accidents. It has harmonised the initial qualification and periodic training of driving examiners, which indirectly led also to an overall raise of the quality of training and knowledge of all drivers[54].

It has introduced the principle of a single driving licence per person and fostered cooperation between Member States by establishing the EU driving licence network (RESPER), allowing the reinforcement of the licensing system.

The directive is also likely to have had a positive impact on elderly drivers' and professional drivers' fatalities,[55] due to harmonised administrative validity periods and the introduction of medical checks upon licence renewal for the elderly and also the harmonisation of the periodicity of medical checks and training for the professional drivers.

The findings of the statistical analysis are reinforced by the findings from the targeted surveys and interviews, and the results of the open public consultation.

The targeted survey with national authorities indicates that, in instances where authorities could make an assessment, the majority of the respondents assessed that the directive had a positive effect on reducing road accidents. 11 out of the 32 national authorities that provided an

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52 European Commission (2017), Study on driver training, testing and medical fitness. Report drafted by TRL, SWOV, BASt, Loughborough University, Monash University.

53 Detailed data in Annex 5 with the situation per Members States on validity periods.

54 According to the implementation study which was part of the literature review used in the evaluation, 11 out of 20 Member States authorities considered that the current provisions of the directive on driving examiners have had a positive effect on road safety, whereas 9 out of 20 expressed no opinion. The results from the targeted survey with national authorities also showed that the provisions on minimum standards for driving examiners are important for improving road safety. This finding was confirmed during the interviews with national authorities. In the survey with non-governmental stakeholders, the minimum standards for driving examiners including quality assurance and periodic training were considered to be one of the most important provisions for road safety (34 out of 41 respondents).

55 A large proportion of national authorities (between 70-90% of 32 national authorities) could not make an assessment of the effect of the directive on specific categories of road users, such as older drivers. Amongst those that could provide a response, 6 out of 32 national authorities (EE, ES,FI,GR, LV and LT) claimed that the directive had a positive effect on road safety for older drivers, and the same number for professional drivers' fatalities (EE, ES, FI, GR, LT and PL).

answer[56], and 30 out of 41 of the non-governmental stakeholders, positively assessed the contribution that the directive had on road safety. Furthermore, in the interviews, 9 out of the 9 national authorities[57] and 7 out of 13 non-governmental stakeholders generally assessed the directive as having a positive effect on road safety. In the open public consultation 362 out of 546 stakeholders shared the same view.

In the survey with national authorities, one third of national authorities[58] claimed that the contributed to road safety improvements, but it is not easy to calculate the precise contribution as other factors (other legislative actions, better enforcement, improvements on road infrastructure, education, standards of the roads, campaigns, more secure vehicles etc.) may also have had a substantive impact on improved road safety figures. The Swedish national authority highlighted that the increased age limit for category A could have affected the accident rates related to motorcycles with young drivers, which would then lead to a positive effect on road safety. Full details of the stakeholders' positions are in detailed in Annex 2.

5.1.1.2 Facilitating free movement for EU citizens

Relevant questions to assess this objective:

EQ 1 What have been the effects of the directive in terms of facilitation free movement?

EQ 7 Which factors have contributed to/hindered the achievement of objectives?

The analysis seems to indicate, mostly based on stakeholder views, that several of the directive's provisions had a positive effect on free movement. The provisions that have been particularly relevant are the mutual recognition of driving licences in the EU, the harmonisation of driving licence categories and vehicles definitions, the Union model driving licence, RESPER and the minimum age limits per category.
On the other hand, the provisions on normal residence, the absence of a framework for a mutual recognition of driving licences issued in third countries, and the fact that the directive allowed for the very prolonged use of some old driving licence models (until 2033), were considered as factors responsible for hindering the objective of enhancing free movement.

The facilitation of free movement of citizens inside the EU is the second general objective of the directive. It is difficult to isolate and determine the specific effects of the directive on the facilitation of free movement, from the effects emerging from other policies or measures also impacting free movement. After the full entry into force of the directive there was an increase in the number of citizens moving cross-border within the European Union but the relation between these movements and the driving licence framework cannot be established. Internal

[56] Note that the remaining 21 respondents were not able to make an assessment. No respondent made a negative assessment.

[57] Although the precise level of effect is difficult to estimate as they considered that the improvement in road safety was not due solely to Directive 2006/126/EC.

[58] FI, FR, GR, IE, LT, PT, SE, SI, SK and Norway.

mobility in the EU is likely to have been influenced by factors other than the driving licence rules, although the simplification of certain rules related to driving licences introduced by the Third driving licence directive is likely to have contributed to increased movement of EU citizens. The analysis below provides a qualitative assessment of the extent to which the provisions of the directive could have contributed to the achievement of this objective.

The implementation report[59] found that the union model licence and the rules on mutual recognition of licences between Member States have simplified the complex framework that was in place prior to the introduction of the directive. Before the directive, there were more than 110 different driving licence models with different entitlements and validity periods in Europe. The directive simplified this patchwork and made the exchange of driving licences easier, thus facilitating the mobility of drivers. The same report also highlighted that the new model was considered more practical, durable, resistant, more convenient in terms of use, and it facilitates a greater freedom of movement for licence holders by improving the transnational acceptance of the driving licences.

In the targeted survey, the majority of national authorities (21 Member States and 2 EEA countries[60]) considered that the third driving licence directive and the former driving licence directives contributed to the free movement of citizens within the EU.

Nevertheless, 9 national authorities mentioned they could not make an assessment and one mentioned that the system is increasingly complex due to many exceptions, acquired rights and usage of national codes. [61]

The targeted survey with non-governmental stakeholders also indicates that the directive contributed to the free movement of citizens. Especially the provisions on mutual recognition, harmonised driving licence rules and vehicle definitions (for 39 out of 41 respondents[62]), the Community Model of driving licences (for 35 out of 41 respondents[63]) and the minimum age categories (for 30 out of 41 respondents[64]).

In the *Interviews,* 8 out of 9 of the national authorities[65] indicated that the directive facilitated the free movement of EU citizens. They mentioned that mutual recognition and harmonisation

[59] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[60] Member States: BG, BE, CZ, CY, DK, EE, ES FI, FR, GR, DE, LV, LU, MT, PL, PT, SK and SI; EEA countries: Iceland and Norway.

[61] NL In the targeted survey stated that the directive did not contribute to improved free movement of citizens within the EU since mutual recognition was already in the 2nd driving licence directive but many exceptions and acquired rights in the different Member States and national codes make the system increasingly complex. However NL in the interviews with national authorities mentioned that the directive had a very positive contribution to the free movement of EU citizens because of mutual recognition of driving licences and the EU single model of driving licences.

[62] 6 automotive and motorcycle federations, 2 drivers associations, 7 drivers school associations, 2 international road transport associations, 10 road safety and road users associations, 2 vehicle manufacturer associations, 10 'other category'.

[63] 4 automotive and motorcycle federations, 3 drivers associations, 6 drivers school associations, 2 international road transport associations, 10 road safety and road users associations, 9 road safety and road users associations, 2 vehicle manufacturer associations, 10 other category.

[64] 4 automotive and motorcycle federations, 2 drivers associations, 5 drivers school associations, 2 international road transport associations, 7 road safety and road users associations, 8 road safety and road users associations, 2 vehicle manufacturer associations, 7 'other category'.

[65] BE, BG, DE, DK, ES FI, GR and NL.

facilitated the usage and exchange of driving licences across the European Union. RESPER facilitated verification of validity, exchanges and enforcement.

Similarly, 8 out of 13 non-governmental stakeholders indicated in interviews that the directive has facilitated the free movement of EU citizens[66].

In the Open Public Consultation, 69% of the respondents (i.e. 378 respondents) considered the directive to have been a relevant tool for the free movement of non-professional drivers, either to a great extent or somewhat; whereas 63% (i.e. 344 respondents) considered the directive to have been a relevant tool either to a great extent or somewhat when it comes to professional drivers.

Despite this positive contribution, the implementation report and certain assessments from stakeholders showed that the rules on normal residence pose challenges[67] together with the absence of a framework for the mutual recognition of third country driving licences[68].

5.1.2 The specific objectives

5.1.2.1 Objective "Reducing administrative burden for drivers, administrations and enforcement authorities"

Relevant questions to assess this objective

EQ 2.1 To what extent has the administrative burden for drivers and Member States been reduced?

EQ 7 Which factors have contributed to/hindered the achievement of objectives?

The findings of the analysis are mixed when it comes to the reduction of the administrative burden. Based on stakeholder views, the administrative activity of issuing, renewing or replacing driving licences seems to not have been affected, or even become less labour intensive under the directive.

Nevertheless some control activities that intervene at the moment of issuing, renewing or replacing of driving licences (like medical exams), or the introduction additional requirements (e.g; graduated access) and shorter validity periods are perceived by citizens as having increased their administrative burden.

The directive introduced several provisions that can be associated with either an increase or decrease in the administrative burden of the relevant authorities and citizens. These include

[66] FIA, IFMC, IRU, ACEM, FEMA, STR, CIECA and BFV.

[67] In the survey with national authorities: AT, BG, BE, CY, DK, FI, DE, GR, IT, IE, LV, LU, LT, NL, RO, SK, SI, ES, SE and Norway indicated that there are some challenges related to the definition of normal residence and the 185-days rule foreseen in the driving licence directive. The problems related to the definition of normal residence are fully detailed in section 5.1.2.7 (Positive and negative unexpected effects of the directive) and those related to absence of a framework for mutual recognition for third country driving licences in section 5.1.2.2 (under the heading Exchange of driving licences between Member States).

[68] In the survey with national authorities: 18 respondents mention as an obstacle (BG, BE, DK, FI, GR, HU, IE, LV, LU, NL, PL, PT, RO, SI, ES, SE, Iceland and Norway).

RESPER, the new EU driving licence model and mutual recognition of the common driving licence across Member States, the introduction of harmonised administrative validity periods and the introduction of progressive access to category A licences.

The following sections present the key findings concerning the extent to which the provisions of the directive had a positive or negative impact on administrative burden for relevant stakeholders, compared to the situation prior to that (covering the second driving licence directive).

The analysis indicates that the establishment of a network between Member States for the exchange of information on driving licences (RESPER) had a positive effect on the reduction of the administrative burden, as it is much easier and faster to exchange information between Member States and to verify the authenticity of driving licences when issuing, renewing or replacing driving licences. If this tool did not exist, the burden of proof would rely on citizens who would have to prove the existence of their rights to drive via alternative means. The common model of driving licences and the principle mutual recognition of driving licences are also perceived as reducing the administrative burden of citizens, when issuing, renewing or replacing of driving licences.

The implementation study[69] indicates that the administrative burden has gradually been reduced with the introduction of the common driving licence by the directive, as well as the principle of mutual recognition[70]. The same study indicated a strong trend towards digitisation of data storage and transfer as well as a decrease in paperwork. According to this study, the assumption of the decrease of the administrative burden is supported by a decreasing number of employees occupied with processing driver licence applications by the issuance authorities.

In the *survey with national authorities* 12 out of 20[71] indicated that the processing time for issuing, exchanging, replacing, and renewing driving licences remained the same, while 6 had the opposite view.

Non-governmental stakeholders assessed that the procedures for non-professional driving licences have become less complex and costly as compared to the procedures for professional drivers.

The results of the open public consultation indicate that the overall perception of stakeholders is that the directive has reduced the administrative burden for drivers when travelling by road through another Member State.

The implementation study[72] indicates that the shorter validity periods and additional requirements (e.g. medical checks for professional drivers) are associated with higher administrative burden for drivers.

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[69] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[70] Dating back to the 2nd driving licence directive but continued in the 3rd directive.

[71] AT, CZ, DE, IT, LV, LT, LU, NL, SK, SI, ES, SE.

Stakeholders consulted in the targeted consultation (7 out of 9 interviewed national authorities, 9 out of 13 interviewed non-governmental stakeholders), as well as in the open public consultation (196 out of 546 respondents) point to the fact that the rules on administrative validity periods have led to higher administrative burden, particularly for professional drivers. However, some stakeholders (5 out of 13 interviewed national authorities) have also acknowledged that the benefits of the harmonisation outweigh the additional burden.

In the targeted survey with non-governmental stakeholders, 16 of 36 agreed or strongly agreed that graduated access may have increased the administrative burden for driving schools and instructors. 5 disagreed, and 14 could not make an assessment.

In the *interviews with national authorities,* 5[73] out of 9 stated that graduated access resulted in higher waiting times for obtaining a licence. The *interviews with the non-governmental stakeholders* confirmed the same finding[74]. On the other hand, some stakeholders[75] perceived that the costs related to the progressive access to category A driving licence are justified due to the benefits for road safety. This point will be further developed in the *efficiency section* (5.2)[76]

5.1.2.2 Objective "Establish uniform driving licence rules and requirements"

Relevant questions to assess this objective:

EQ 2.2 In which areas (e.g. validity periods, medical exams, training or testing) have uniform driving licence rules and requirements been established across MSs? In which areas are there still divergences?

EQ 5 What has been the impact, if any, of differences across Member States regarding the recognition of driving licences issued by third countries, for example in relation to driver shortage for EU hauliers?

EQ 7 Which factors have contributed to/hindered the achievement of objectives?

The analysis shows that several uniform rules and requirements were implemented in the Member States as a consequence of the directive, allowing for greater convergence and a greater degree of harmonisation. Harmonised requirements on mutual recognition of driving licences, administrative validity periods, competence of driving examiners and medical checks are perceived as particularly beneficial. However, some differences still exist, particularly when it comes to the application of exemptions for certain categories of drivers (novice and older drivers) and the issuance of driving licences upon expiry of administrative validity periods.

Administrative validity periods

[72] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[73] BE, NL, FI, GR and DK.

[74] Both FEMA and ACEM noted that the licencing system is complex. FEMA also highlighted that the system is not supporting of the objectives of the driving licence directive to reduce administrative burden, as licencing expensive and complex

[75] BVF, STR and FIA.

[76] Question 9 "Has the directive resulted in any excessive costs / negative impacts?"

The evaluation indicates that an increased harmonisation of administrative validity periods has been achieved as a result of the directive, but not a total harmonisation due to the flexibility given to Members States by certain provisions of the directive.

Article 7 of the directive lays down the provisions for administrative validity periods. The directive stipulates that driving licences for categories A and B shall have an administrative validity period of 10 years, but Member States may choose to issue such licences with an administrative validity period of up to 15 years. The directive further stipulates that driving licences for categories C and D have an administrative validity period of 5 years. According to the directive, the renewal of a driving licence upon expiry of the administrative validity period is subject to: continuing compliance with the minimum standards of physical and mental fitness for driving set out in Annex III and normal residence in the territory of a Member State issuing the licence. The directive lays down that when renewing driving licences in categories A and B, Member States may require an examination applying the minimum standards of physical and medical fitness set out in Annex III to the directive. The directive allows Member States to limit the administrative validity period when it comes to novice drivers and drivers that have reached the age of 50 with the aim of improving road safety.

The implementation study, pointed to several differences still remaining particularly when it comes to the issuance of driving licences upon expiry of the administrative validity period, the application of exemptions for certain categories of drivers (novice and older drivers) and administrative validity periods of 10 and 15 years for driving licence categories A-B and of 5 years for driving licence categories C-D.

According to the results of the above mentioned study and the survey results[77], most countries (19 out of 30) chose a validity period of 10 years for driving licences categories A-B. 11 countries have adopted an administrative validity period of 15 years for driving licence categories A-B.

Another specificity is that some countries have limited administrative validity periods for novice drivers, while others do not have such limited validity periods. Some countries implement a sort of a probation/ trial period or a limited administrative period. For category A or B licences a limited period of 2 or 3 years is applied by some countries.

Medical checks

The information gathered in the desk review, the stakeholder survey and interviews indicates that there may be an increased harmonisation of medical checks since the entry into force of the directive, particularly when it comes to professional drivers, but that differences still remain due to the flexibility given to member states.

Annex III to the directive sets out minimum standards of physical and mental fitness for driving. The directive requires that the minimum standards be checked by Member States when issuing a driving licence. Member States may impose stricter standards if deemed necessary.

[77] The survey results did not cover MT, PT, United Kingdom and the response from the Czech national authority was considered invalid, as they claimed an unrestricted validity period even though this is not in line with the driving licence directive.

The directive allows Member States to apply increased frequency of medical checks for certain categories of drivers (novice and older drivers). The directive also requires that Member States check continued compliance with the minimum standards in Annex III when renewing driving licences in categories C and D. Member States may also apply an examination to check requirements with Annex III when renewing licences in categories A and B.

These standards are considered as one of the most relevant measures for road safety according to some stakeholders[78]. One non-governmental stakeholder[79] mentioned that maybe some more harmonisation should be considered in this area.

Some differences between Member States still remain, particularly when it comes to the application of medical checks for persons with medical conditions and for older drivers as explained below.

According to the implementation study[80] there is a significant variation in medical checks when renewing non-professional driving licences (A and B). Two thirds of the Members States required no medical examination at renewal, while only one third required a medical examination.

For professional driving licence categories (C-D), almost all countries ask for some sort of a medical examination upon renewal and in a few instances, a medical examination upon renewal was only required at a certain age of a driver. Two Member States indicated having a time limit for the renewal of professional driving licences.

Training and testing requirements

The analysis highlights that training and testing practices and requirements vary across Member States and the degree of harmonisation is low. The directive only provides minimum requirements and leaves it up to the Member States to establish specific requirements and procedures for training and testing.

Annex II to the directive provides minimum requirements for driving tests, whereas Annex VI provides minimum requirements for driver training and testing for motorcycles within category A (progressive access). However, beyond providing minimum requirements, the directive leaves it up to the Member States to establish specific requirements and procedures for training and testing. As a result, training and testing practices and requirements vary across Member States.

A first important variation is between the nature of the driver training which can be formal or informal[81]. In most Member States, learner drivers can prepare for the practical driving test only by taking formal driving lessons from a professional driving instructor. Some Member States allow learner drivers to take only informal driving training in preparation for the driving

[78] In the targeted survey when replying to EQ7 "Which factors have contributed to/hindered the achievement of objectives?" non-governmental stakeholders considered that the enforcement of harmonised medical checks is one of the most important measures for road safety.

[79] IRU

[80] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[81] Formal training is tuition based and is provided by a qualified instructor. Informal training can be done in instances where the learner gains experience while supervised by an experienced driver.

test (typically with a parent)[82]. A few Member States have a dual licencing system, meaning that learner drivers take a combination of formal and informal training[83]. In all cases where informal training is allowed, the appearance of electric vehicles can create problems as they all don't have gears and therefore cannot be used to provide complete informal training.

Informal on-road driver training is allowed in 12 Member States before the driving test, whereas in 2 Member States it is allowed after the driving test.[84]

Variations are also found in terms of mandatory or optional theoretical training and whether a fixed number of lessons is required prior to testing. According to the 2017 European Commission study on driver training, testing and medical fitness[85], theory training is mandatory in 18 Member States and optional in 9 Member States.[86]

The targeted survey, the interviews, and the 2017 European Commission *study on driver training, testing and medical fitness*[87] showed that national curricula differ, including on the use of a multi-stage training and post-test courses.

According to this study the majority of the countries imposes a mandatory and fixed number of theory training lessons and formal on-road driver training. The majority of countries have also mandatory formal on-road training[88].

Only 2 Members States included hazard perception and risk-/ self-assessment skills in their curriculum[89].

The stakeholder consultation showed that there are several national specific requirements related to training and testing of novice drivers (e.g. topics addressed in the exam, number of questions, regulation of price of training and theory courses). Stakeholder views vary concerning the need to harmonise training obligations. Some stakeholders indicate that the absence of a harmonised framework for training has implications on the skills of drivers and road safety, whereas other stakeholders point to the need to allow flexibility to Member States to accommodate their national specificities in defining training curricula.

The results of the consultation activities indicate that approximately half of stakeholders consider the directive had a positive effect on the increase of driving skills, particularly when it comes to professional drivers. [90]

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82 BE (the 36 months training option) and FI.

83 BE (the 18 months training option), DE, FI, FR and DE

84 Before test: AT, BE, CY, EE, FI, FR, IE, LT, LV, LU, PT and SE. After driving test: DE and NL.

85 European Commission (2017), Study on driver training, testing and medical fitness. Report drafted by TRL, SWOV, BASt, Loughborough University, Monash University.

86 Mandatory: AT, BG, HR, CZ, DK, EE, FI, DE, GR, HU, LV, LT, LU, PL, PT, SK, SI. Optional: BE, CY, FR, IE, IT, MT, NL, ES, and SE.

87 European Commission (2017), Study on driver training, testing and medical fitness. Report drafted by TRL, SWOV, BASt, Loughborough University, Monash University.

88 But 5 do not CY, IT, MT, ES and SE.

89 DE and NL.

90 Concerning the skills of professional drivers, a substantive proportion of national authorities consulted in the survey (18 out of 32) could not make an assessment, but the remainder (13 out of 32) made a positive assessment. In the targeted survey with non-governmental organisations, just over a half of the 41 surveyed non-governmental stakeholders perceived that the directive led to improved driving skills of professional and non-professional drivers.

Requirements for obtaining category AM driving licence

On the requirements for obtaining category AM driving licences, the directive seems to have brought a large degree of harmonisation, but not complete harmonisation.

Concerning the requirements for obtaining a category AM driving licence, the directive introduced the category of mopeds and an obligation to pass a theoretical test. Member States have the option to also require a test of skills and behaviour and a medical examination for this category, but it is not mandatory.

Although the directive only requires that applicants pass a theoretical test, the vast majority of Member States have implemented theoretical and practical tests and practical training, but not all Members States did so[91]. There are still specific national requirements in place for this category[92].

Requirements for obtaining a category A driving licence

On the requirements for obtaining a category A driving licence, the directive seems to have effected a large degree of harmonisation but not complete harmonisation.

The directive has set that the minimum age to accede to a category A driving licence at 20 years old provided the applicant has held for at least two years an A2 driving licence (a licence for less powerful motorcycles). This staging requirement may be waived if the candidate is at least 24 years old.

The category A driving licence can be obtained through direct access in most countries but not all.[93]

Practical testing requirements are now demanded by 26 national authorities compared to 23 prior to the implementation of the directive.

Theoretical training is currently implemented by 18 surveyed countries, since the implementation of the directive[94].

Theoretical and practical testing are in force in all the countries. 3 Members States[95] have introduced practical tests with the implementation of the directive.

[91] Currently, theoretical test is implemented in 26 Member States, GR is the only country without a theoretical test for this driving category. The total number of countries imposing practical test climbed to 21 countries, with 6 additional countries after the implementation of the directive (FI, HU, LV, ES, RO, and EE).

[92] For instance AT imposes medical checks from the age of 20, and DE asks for an eyesight test, and in FI the practical test can be conducted only with light four-wheel vehicles and manoeuvre tests with mopeds. In Iceland one of the items of the theoretical training the first aid course, required together with a health statement.

[93] ES and LU do not allow persons to obtain A driving licence directly.

[94] CY and RO have newly introduced it and FI has retracted the obligation according to their responses.

[95] CY, FR and RO.

Requirements for obtaining group category B driving licence

The directive seems to have brought a large degree of harmonisation but not total harmonisation of the requirements for obtaining group a category B driving licences.

The general rule for categories B, C and D is that that applicants need to pass a test of skills and behaviour and a theoretical test and meet some medical standards, in accordance with Annexes II and III to the directive:

Practical testing requirements are in force in 27 countries[96]. Both practical and theoretical testing requirements have been implemented in all surveyed countries after the directive's implementation. Practical training is implemented in 22 Member States. Health examinations are an obligation in 20 of the surveyed Member States and one EEA country.

Requirements for obtaining a group category C driving licence

The directive seems to have effected a high degree of harmonisation of the requirements for obtaining group category C driving licences.

Regarding national requirements for obtaining a C, C1, C1E and CE driving licence, after the implementation, all countries imposed a theoretical and practical test for citizens to obtain this type of driving licence.

Since implementation, the total number of surveyed Member Sates imposing practical training increased to 19 with 2 additional Member State having implemented it[97]. Iceland and Norway also impose practical training. There are still several national specific requirements. [98]

Requirements for obtaining group category D driving licence

The analysis points out to a high level of harmonisation of the requirements for obtaining group category D driving licence already existing prior to the directive's implementation.

Regarding the national requirements for obtaining a D, D1, D1E and DE licence, these have not changed significantly across countries before and after the implementation of the directive. As reported by the national authorities, even prior to the implementation, all countries except one had imposed theoretical and practical test requirements for citizens to obtain this type of driving licence. Today all countries require both tests but additional national requirements are still in place[99].

[96] It includes Norway and Iceland

[97] IE and RO

[98] BE indicated that the theory training is still optional while the practical training can be done with a learner's permit. SK stated added the requirement of a psychological examination. In GR, no medical re-examination is needed, when the medical check is valid for Group 1 or 2. In RO, an additional requirement is to hold a category B licence.

[99] For instance BG has highlighted special education requirements and in BE theoretical training is still optional. An additional requirement indicated by the German national authority is the certificate of conduct. In RO, an additional requirement is to hold a category B licence.

During the *interviews with national authorities*, several respondents confirmed that training requirements vary among the Member States, however, they mostly stated that there is no need for harmonisation of training requirements as long as there are harmonised standards for driving examination.[100]

Minimum standards for driving examiners

The analysis indicates that Member States have fully implemented the new minimum requirements concerning initial qualifications of driving examiners. However, there are differences across the countries in their implementation. The analysis also highlighted that Member States consider that the current quality assurance and periodic training requirements are sufficient.

Article 10 of and Annex IV to the third driving licence directive set out minimum standards for driving examiners concerning quality assurance and regular periodic training measures.

According to the implementation study,[101] all Member States fully implemented the requirements concerning initial qualifications of driving examiners.

Regarding the implementation of quality assurance requirements, 17 out of 20 Member States indicated full implementation[102].

The *targeted survey with national authorities* highlighted some variation in terms of the requirements for driving examiners. The majority of countries (25 out of 30) have implemented the supervision of examiners at work and periodic training and accreditation. Several countries (21 out of 30) have implemented periodic review of outcomes of driving tests.
Member States consider that the current quality assurance and periodic training requirements are sufficient.[103]

Exchange of driving licences between Member States

The directive seems to have effected a substantial degree of harmonisation of the exchange of driving licences in application of the principle of mutual recognition, despite the fact that in some cases the exchange has to go through an administrative verification process and is not always automatic.

[100] DE, DK, ES, FI, GR and SI and Norway,

[101] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[102] The implementation study found that the requirements on driving examiners have been implemented to varying degrees by the Member States. The requirements on initial qualification of driving examiners were fully implemented in all countries. The requirements on quality assurance were fully implemented in 17 out of 20 Member States and Norway indicated full implementation (AT, BG, DE, DK, ES, FI, FR,, IE, LV, LT, LU, NL, PL, SK, SE, Norway and United Kingdom). Out of the other three Member States, FR indicated that the quality component was not put in place until May 2017, which is why the requirements were being partially implemented; SI claimed to have differently implemented reaccreditation, but without indicating the way it is different; and PT claimed that these requirements were not yet all implemented, but they were in the national legislation.

[103] The implementation study found that the current level of requirements is considered sufficient by national authorities. For both quality assurance requirements and periodic training requirements, the implementation study found that 19 out of 20 Member States considered these to be sufficient.

Article 2 of the directive stipulates that driving licences issued by Member States shall be mutually recognised.

The implementation study[104] and the targeted consultations show that only around one third of the Member States automatically recognise driving licences issued in another Member State/EEA country.

A considerable share of the Member States (12 out 21) does not recognise licences in certain situations, e.g. when the minimum age is different than what it is allowed according to national requirements, or the proof of normal residence is not established.

The conditions for exchange of driving licences are also not uniform. For instance some countries only require a simple check of validity in RESPER, some require a formal proof of normal residence,[105] while others require the request to be made in person to the national driving licence authority.

Exchange of driving licences between Member States following a prior recognition of a third country driver licence in another Member State

The analysis seems to show, based on stakeholder views, that although Member States are not obliged to recognise the licences issued by a third country and already recognised in another Member State[106], the majority recognise those driving licences.

Article 11(6) of the directive gives Member States the possibility to exchange a driving licence issued by a third country for a Community model driving licence. Nevertheless, if the holder of this licence transfers his normal residence to another Member State, the latter Member States need not apply the principle of mutual recognition set out in Article 2. The directive does not establish a uniform framework for the recognition of driving licences, leaving the possible recognition to be a matter for each Member State.
The desk review[107]and stakeholder consultations show that 18 Members States recognise those driving licences automatically, while 8 require a conformity check.

There are nevertheless differences in the conditions of those exchanges. For instance, some national authorities do not recognise third country licences if they do not have the prior existence of a mutual recognition agreement with that third country[108], some require a minimum residence of one year in the country[109], while others only exchange it if the road safety conditions and requirements related to

[104] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[105] FR.

[106] According to Article 11 (6) of the directive and the jurisprudence of the ECJ- Judgement of 28 February 2019, Case C- 9/18; ECLI:EU:C:2019:148. Available at: http://curia.europa.eu/juris/document/document.jsf?text=&docid=211186&doclang=EN

[107] The European Commission (2017), The implementation study showed that 20 out of 25 of the Member States recognised licences issued following the exchange of a Driving licence issued by a third country, without any conditions.

[108] AT and IE.

[109] FR.

a driving licence of the third country are comparable to the national ones[110].**Impact of differences in recognition of driving licences issued in third countries**

The analysis, is based mostly on Member States authorities views that have the sole competence to recognise and exchange driving licences and seems to indicate that the lack of a uniform framework for the recognition of driving licences issued in third countries may have led to an increased complexity and administrative burden for national authorities (too many and too diverse bilateral agreements and Memoranda of Understanding). However, the latter could not be quantified during the data collection activities and lies solely on a qualitative assessment.

In the *survey with national authorities*, two national authorities[111] mentioned that the definitions of driving licence categories in third countries are not always clear and that the access to information from the third countries is difficult, thus rendering the recognition to be difficult[112]. Another obstacle for the recognition is that in many instances, third countries have less demanding standards of road safety when exchanging licences[113].

Nevertheless, 4 national authorities'[114] representatives identified no challenges related to the absence of a uniform framework for the recognition of driving licences.

In the survey with non-governmental stakeholders, the highest share of respondents (16 out of 41) have indicated that there were no challenges related to the absence of a uniform framework for the recognition of driving licences issued by third countries, while approximately one quarter indicated that there were challenges (10 out of 41). The remaining respondents could not make an assessment. Non-governmental stakeholders also suggested that the provision has less impact on road safety than on free movement of citizens.

One non-governmental stakeholder said that different rules regarding the recognition of driving licences from third countries represent an obstacle for third country nationals to moving into the EU, since their driving licence - once exchanged by a Member State - might not be recognised across the whole EU.[115] In relation to the professional driver shortage, several interviewees mentioned that the lack of harmonisation could prevent third country nationals from driving for EU hauliers, but that a driver shortage in the EU should not lead to loosened conditions and requirements for professional drivers coming from third countries.

Another non-governmental stakeholder[116] suggested that all third country professional drivers driving in the EU should have the same training and testing requirements as the EU nationals. The same respondent indicated that sometimes the certificates of professional competence[117] are obtained too easily by third country professional drivers, and the requirements are less strictly

[110] DE.

[111] HR and NL.

[112] CY, FI, LV and Norway.

[113] ES, SE and SI.

[114] CZ, DE, LU and SK.

[115] UETR

[116] ETF

[117] In accordance with Directive 2003/59/EC

applied due to the shortage of professional drivers in the EU. Also, the non-EU drivers are more easily hired in certain Member States due to the low costs for drivers' attestation, which presents disadvantages for EU-national professional drivers compared to non-EU professional drivers. A non-governmental stakeholder[118] suggested that there should be mandatory training and examination for all third-country nationals.

During the *interviews* one national authority[119] referred to the negative impact related to driving licence shopping that results from the lack of harmonisation of the requirements and stated that some holders of a third country driving licence, which would not be recognised in the Netherlands, would 'shop' for a more favourable Member State to recognise their driving licence, and then use it in the Netherlands.

5.1.2.3 Objective "Reducing the possibilities of driving licence fraud and driving licence tourism"

Relevant questions to assess this objective:

EQ 2.3 To what extent have the possibilities of driving licence fraud and "driving license tourism" been reduced?

EQ 2.2 In which areas have uniform driving licence rules and requirements been established across MSs? In which areas are there still divergences[120]

The analysis seems to indicate, based on stakeholder views, that the new Community Model of driving licence may have improved document security against driving licence fraud and that driving licence tourism may have been reduced, but some challenges still remain including: the provision on normal residence, outdated national registers, and a lack of harmonisation in relation to the recognition of driving licences issued by third countries. However, there are no official statistics on driving licence fraud and driving licence tourism across the EU Member States that allow for a quantitative assessment.

Article 3 of the directive requires Member States to take necessary steps to avoid the forgery of driving licences, including that of the model driving licences issued before the entry into force of the directive. Annex I to the directive lays down a series of provisions concerning the community model driving licence including security features to prevent the risk of forgery and fraud.

Stakeholders that were consulted generally agree that the number of instances of driving licence fraud and driving licence tourism have been reduced due to the directive

Overall national authorities had difficulties in providing an assessment of the extent to which the directives had contributed to decreases in the numbers of fraud compared to the period prior to their first implementation. Amongst countries that made an assessment, the proportion of national authorities that considered the directives to have made a contribution to the reduction

[118] BVF

[119] NL

[120] Insofar as the replies contained the data concerning anti-fraud measures.

of fraud was relatively higher. Specifically, as shown the (Table 4 in Annex V), 11 national authorities found that the directives helped decrease the number of forged driving licences detected per year, 10 national authorities assessed that the driving licence directive contributed to reducing driving licence fraud involving citizens from other EU countries and, finally, 6 national authorities considered the driving licence directives to have helped reduce fraud involving citizens of third countries as compared to 1983. In two Member States (BG and LU) different authorities within the same country had diverging opinions.

The feedback from the targeted consultation seems to indicate that driving licence fraud has been reduced. In this regard, the consulted national authorities highlighted the importance of RESPER to reduce fraud, since it facilitates an easier exchange of information and detects at an early stage whether a driving licence is not valid.

However, the *targeted survey with national authorities* broadly confirmed that there may be a negative impact on road safety and driving licence tourism resulting from the absence of an EU framework for mutual recognition of driving disqualifications, but that this impact is difficult to assess[121]. 9 respondents suggested that the absence of an EU framework for mutual recognition of driving disqualifications has a negative impact on road safety and driving licence tourism, and provided examples.[122]

More than half of the surveyed non-governmental stakeholders (22 out of 41) perceived that the directive has led to lesser instances of driving licence tourism and fraud, around 20% of the respondents (8 out 41) claimed that opposite, and the remaining one quarter of the respondents (11 out 41) could not provide an assessment.

In the open public consultation, opinions were split when it comes to the directive's role in the reduction of driving licence fraud and driving licence tourism. Around 40%[123] agreed or strongly agreed that the directive is effective in this regard, whereas 40%[124] disagreed or strongly disagreed with this statement.
Some of the remaining challenges that were noted by stakeholders include the fact that the implementation of counter-falsification measures varies significantly across Europe. In the Stakeholders workshop it was stated that document security features are not sufficiently adapted to evolving counter-falsification risks, and there is a need to further coordinate the implementation of minimum data protection safeguards across Member States, as measures to protect against document fraud.

The implementation study[125] recommended the intensification of the work on counter-falsification technologies (including false identities), given that more and more cases of lookalike attacks take place, and it has been shown that the improved security features of the European driving licences provide an increased level of security for the document itself.

[121] AT, FR, IE, IT, LV, Norway, SI and SE.

[122] BE, BG, the NL, ES, SK, SI and Norway.

[123] 217 out of 546 stakeholders

[124] 223 out of 546 stakeholders

[125] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

Other remaining challenges noted by stakeholders included the lack of clarity of the provision on normal residence, the fact that some national registers are outdated, and the lack of harmonisation in relation to the recognition of driving licences issued by third countries.

5.1.2.4 Objective "Raising the driving skills of non-professional and professional drivers"

Relevant questions to assess this objective:

EQ 2.4 To what extent have the driving skills of non-professional and professional drivers been raised?

EQ 4. To what extent the possible differences between Member States resulting from the lack of minimum and/or harmonised training obligations for learner drivers have had an impact on road safety?

EQ 2.5 To what extent have the provisions on the qualification of driving examiners contributed to safe driving? Is the relevant monitoring framework fit for that purpose?

The analysis indicates that the directive did not harmonise training requirements, although this was not one of its objectives, and there is limited evidence, based on stakeholder views, that the driving skills of professional and non-professional drivers have been substantially increased. The only exception are users of powered two-wheelers, where the introduction of graduated access to motorcycle licences seems to have improved the driver skills, according to stakeholder views.

The directive, despite including minimum requirements for driver training and testing (Annex V and VI), does not introduce harmonised training obligations and there is a wide variety of approaches in terms of training requirements across Member States[126]. The evaluation has attempted to determine if this non-harmonised approach has raised the driving skills of non-professional and professional drivers.

A large proportion of the surveyed national authorities couldn't provide any assessment on these matters[127]. Nevertheless, several national authorities indicated during the interviews that the driving skills of non-professional and professional drivers have not been significantly raised.

The survey with non-governmental stakeholders indicates that drivers have now better driving skills and improved behaviour, but that it was difficult to determine whether the results could be attributed to the directive, since several Member State already had very high standards in terms of education and testing before the implementation of the directive.

In the targeted survey with non-governmental organisations, more than half of the 41 stakeholders considered that the directive led to improved driving skills of professional and non-professional drivers. Around 20% (8 out of 41) perceived that the directive has not led to improved driving skills of professional drivers, and slightly more respondents (11 out of 41) indicated that the driving skills of non-professional drivers have not been improved as a result

[126] According to the results of desk review and the survey analysis.

[127] 52% of the 32 national authorities could not make an assessment for professional drivers, respectively 46% could not make an assessment for non-professional drivers.

of the directive. The results from the interview analysis showed that there was only a limited increase in the driving skills of non-professional and professional drivers.

In the open public consultation, 56% of the stakeholders[128] considered that drivers who had succeeded in the examination were better qualified than before.

To what extent have the possible differences between Member States resulting from the lack of minimum and/or harmonised training obligations for learner drivers had an impact on road safety?

The results of the analysis are mixed on this point. Most of the authorities were of the opinion that the lack of minimum and/or harmonised training obligations has had no impact on road safety. On the other hand, non-governmental stakeholders consider that training requirements should be further harmonised across the EU.

The directive, despite including minimum requirements for driver training and testing (Annex V and VI), does not introduce harmonised training obligations and there is a wide variety of approaches in terms of training requirements across Member States[129]. The literature assessing the effects of an absence of a harmonised framework for training requirements in the driving licence directive is rather scarce, therefore the conclusions mostly rely on the results provided during the stakeholder consultations.

The survey of national authorities provided mixed views. 11 out of 29 Member States considered that there are no challenges in terms of road safety with the current harmonisation of practical training requirements, and 11 respondents could not assess the matter. The remaining 7 surveyed national authorities believed that there are some challenges resulting from the current level of harmonisation.

During the interviews with national authorities, none of the national authorities explicitly assessed that the discrepancies in training obligations for learner drivers across Member States affected road safety in the EU in any way.

As regards theoretical training, 12 out 29 governmental authorities consider that there are no specific challenges, while 11 remained undecided. 6 surveyed national authorities believed that there are some challenges resulting from the current level of harmonisation. Only one respondent explicitly suggested that the challenges relate to road safety. Several indicated that no further harmonisation is needed since the directive stipulates minimum requirements for driving examinations, which are sufficient.

In the *interviews with non-governmental organisations*, the respondents listed several negative consequences for road safety arising from the lack of harmonisation. For example, some indicated that the Member States do not focus enough on training requirements[130], that they do

[128] i.e. 305 out of 546 respondents.

[129] According to the results of desk review and the survey analysis.

[130] STR, FEMA, ETSC.

not require lifelong learning,[131] and that are no training obligations for motorcycles in the directive.[132]

Effect of the directive on the qualifications of driving examiners

The analysis suggests that the harmonised rules on driving examiners had a positive impact on road safety and that the current level of harmonisation is broadly sufficient.

The directive (in article 10) has harmonised the initial qualification and periodic training of driving examiners requiring that they meet minimum standards for their work, including quality assurance and regular periodic training.

The responses to the survey with non-governmental stakeholders[133] indicated that the minimum standards for driving examiners are one of the most important provisions for improving road safety. This finding is also supported by the results of the targeted survey and the interviews with national authorities.

Desk research[134] reveals that Member States considered that the level of requirements for both quality assurance and periodic training as of 2017 to be broadly sufficient (19 out of 20 Member States). In that study, stakeholders also indicated that periodical training should focus on quality rather than intensity.

Although being broadly sufficient both the desk research[135] and the targeted surveys with national authorities and non-governmental stakeholders point out that the **qualifications of driving examiners** should be updated with new skills such as:

- knowledge on examination design, test execution and training
- psychological knowledge and better communication skills[136]
- knowledge on new technologies, advanced driver assistance and energy efficiency increasing systems and semi-autonomous driving
- continuous training on lighter categories of vehicles.

[131] STR, FIA.

[132] FEMA and European Transport Safety Council.

[133] 5 automotive and motorcycle federations, 2 drivers associations, 7 drivers school associations, 1 international road transport associations, 10 road safety and road users associations, 2 vehicle manufacturer associations, 7 'other category'

[134] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[135] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[136] The implementation of Directive 2006/126/EC on driving licences.(drafted by Hasselt University, NTUA) noted that the lack of communication skills seem to be the examiners' weakest point and that these skills are some of the most demanding and difficult to improve. Issues like examination anxiety are considered important and driving examiners should be able to deal with it. That study also noted that Member States should foresee that theory tests and practical tests for driving instructors should include testing of knowledge on educational methods and the skills to apply these methods. The ability to observe the candidate should be taught during the basic practical training. European Commission (2017);

5.1.2.5 Objective "Facilitate implementation and enforcement of driving licence rules"

Relevant questions to assess this objective

EQ 2.7 *To what extent has the application and the enforcement of driving licence rules by Member States been facilitated?*
EQ 3 *To what extent has RESPER facilitated the objectives of the directive and what are its shortcomings, if any?*
EQ 6 *What has been the impact, if any, of the absence of an EU framework for the mutual recognition of driving disqualifications on road safety in general and on driving license tourism in particular?*
EQ 9 *Has the directive resulted in any excessive costs / negative impacts?*

To what extent has the enforcement of driving licence rules by Member States been facilitated?

The analysis seems to indicate that the enforcement of driving licence rules was somewhat facilitated by the directive, although it is difficult to draw definite conclusions solely based on stakeholder views. The qualitative findings from desk research, targeted surveys and interviews are mixed, and there are no official statistics on enforcement across the EU Member States.

Article 15 of the directive states that Member States should assist each other in the implementation of the directive and exchange information on the licences they have issued, exchanged, replaced, renewed or revoked. RESPER is the network that operationalises the information exchange between driving licence authorities in the Member States.

All Member States are obliged to connect to and use the RESPER network. The main objective of the platform is to ensure the 'one person, one licence' principle, which ensures that drivers are qualified for driving and to verify possible instances of driving licence fraud by verifying the validity of licences issued by other countries.

In the *targeted survey with national authorities,* findings were mixed; 14 national authorities considered that the directive facilitated the enforcement of driving licence rules, referring in particular the provisions on the harmonised driving licence model, the RESPER network and the Commission's decision on equivalences as factors leading to enforcement and reduction in fraud instances.[137] Nevertheless, 4 national authorities[138] stated that the directive has not facilitated the enforcement of driving licence rules, and 13 national authorities could not make an assessment.[139]

During *interviews,* 5 out of 8 interviewed national authorities indicated that the enforcement has been facilitated to a high extent,[140] and the other three interviewees gave a slightly less positive assessment.

[137] BE, BG, CY, CZ, EE, FI, DE, IE, LV, LU, MT, PL, SI, and ES.

[138] BG, FR, IT and NL.

[139] AT, DK, GR, HU, HR, LU, LT, PT, RO, SE, SK, Iceland and Norway.

[140] DE, DK, ES, GR and SI.

All eight interviewed national authorities considered that the main factors that contributed to the facilitation of the application and the enforcement of driving licence rules were the harmonisation of requirements, the uniform driving licence model and RESPER.

Non-governmental stakeholders replying agreed that the directive somewhat facilitated the enforcement of driving licence rules.

Effectiveness and shortcomings of RESPER in facilitating the objectives of the directive

The analysis seems to suggest, based on stakeholder views, that overall RESPER is an effective tool for the exchange of information between national authorities and has contributed to facilitating free movement.

The advantages of RESPER identified by stakeholders are: the fast exchange of driving licence information; access to relevant information on validity of driving licences; possibility to prevent driving licence fraud and accelerate the procedures related to the exchange and renewal of driving licences; and facilitation of the implementation of the principle of mutual recognition of driving licences. The evidence is less conclusive on whether RESPER helped reducing the administrative burden by reducing processing times for driving licences.

The disadvantages relate both to the system's quality (query errors, incomplete information) as well as limited uses (RESPER is not being utilised when it comes to exchange of driving information for enforcement purposes, exchange of information on demerit points, exchange of information on national codes, and normal residence).

The implementation study[141] found that RESPER had contributed to the free movement of persons through the simplification of administrative procedures, which allowed for quicker exchange and replacement of driving licences. It also found that RESPER had facilitated the implementation of the 'one person, one driving licence' principle as a result of the swift and simultaneous checks of the driving licence information which enables the detection of cases where one person has more than one driving licence in different countries. RESPER has also helped to fight against fraud in the instance of exchange requests of driving licence for vehicle categories for which drivers are not qualified and/or authorised in a Member state other than the one of their normal residence. In terms of reduction in the administrative burden, the study was less conclusive. Only half of the Member States considered that RESPER had reduced the administrative burden in the exchanges and renewals of driving licences. In the case of first issuance of driving licences, approximately one third of the Member States considered RESPER to have had no effect.

In the evaluation's *survey with the national authorities,* 22 out of 28 authorities indicated that RESPER helped identifying licence fraud and driving licence tourism. The majority of the authorities found that processing times had remained the same after the implementation of the directive.

[141] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

Advantages of RESPER [142]:

- Fast exchange of driving licence information (according to 15 out of 22 national authorities)
- Access to relevant information on validity of driving licences[143]
- Possibility to prevent driving licence fraud and accelerate the procedures related to exchange and renewal of driving licences[144]; the principle of mutual recognition of driving licences[145]
- Reduction fraud[146]
- Using the information for enforcement purposes[147]
- Using the information in the process of exchanging driving licences[148]

Disadvantages of RESPER

- Information made available should be more accurate and comprehensive system regarding withdrawn driving licences)[149]
- In the case of exchange of driving licences, Code 70[150] is not always displayed even if it is imprinted on the driving licences[151]
- Different interpretation of driving licence status across countries[152]
- Not all Member States systematically make use of RESPER[153]
- Lack of user-friendliness [154]
- Limitations in terms of the connection of RESPER to other systems such as TACHOnet[155]

[142] According to the findings of the survey and interviews with national authorities.

[143] DK, HR NL, LT and LU.

[144] BE, DE, CY, GR, RO, and ES.

[145] ES.

[146] BE and ES.

[147] BE, SI, FI, and BG

[148] NL, SI and ES.

[149] BE, BG, CZ, FI, GR, DE, HU, LV, RO, SK, SI, SE, IE, ES and Norway.

[150] According to Article 11(6) of the directive "Where a Member State exchanges a driving licence issued by a third country for a Community model driving licence, such exchange shall be recorded *[with a code 70 according to point 3 of Annex I to the directive]* on the Community model driving licence as shall any subsequent renewal or replacement. Such an exchange may occur only if the licence issued by the third country has been surrendered to the competent authorities of the Member State making the exchange. If the holder of this licence transfers his normal residence to another Member State, the latter need not apply the principle of mutual recognition set out in Article 2."

[151] BE, DE, DK, IE, LU, SI and SK.

[152] Norway.

[153] DK, GR, LT and RO.

[154] BE and IE.

[155] TACHOnet is a telematic network in operation across the EU and beyond (non-EU AETR countries) to allow an automated exchange of driver card information between member countries and thus fight against fraud...

What has been the impact, if any, of the absence of an EU framework for the mutual recognition of driving disqualifications on road safety in general and on driving license tourism in particular?

> The evaluation indicates that the absence of a common framework for mutual recognition of driving disqualifications poses challenges when it comes to preventing abuse by drivers that commit offences on the territory of one Member State but then can drive in another Member State with impunity for those offences.

The problem was raised also at the level of the Court of Justice of the European Union, which has shown several challenges when it comes to the recognition of the cross-border effects of a decision on the withdrawal of the right to drive in another Member State, in particular when the decision is taken in the country of first issuance and there is a request for exchange of the driving licence in the new country of residence.

In the absence of a clear EU framework, the Court of Justice of the European Union issued several clarifying rulings on the subject[156]. For instance, in the recent Case C- 112/19 – *Kreis Heisenberg*[157] the Court ruled that the second subparagraph of Article 11(4) of the directive must be interpreted as meaning that, in the case of a withdrawal of the authorisation to drive from the holder of a driving licence in a Member State, prior to the exchange of that driving licence in another Member State in accordance with Article 11(1) of the directive, the former may still refuse to recognise the driving licence which was the subject of the exchange.

The *targeted survey with national authorities* broadly confirmed that there is a negative impact on road safety and driving licence tourism resulting from the absence of an EU framework for mutual recognition of driving disqualifications, and that this impact is difficult to assess[158] 9 respondents suggested that the absence of an EU framework for mutual recognition of driving disqualifications has a negative impact on road safety and driving licence tourism, and provided examples.[159]

The negative impact on road safety and driving licence tourism was suggested also by participants in *interviews with national authorities and non-governmental stakeholders.*[160] One national authority[161] stressed the problem of non-harmonised procedures in the case of driving bans imposed on non-residents.

In interviews, three non-governmental stakeholders[162] indicated that a better exchange of information on driving offences is needed, for instance, by establishing an EU-wide database. This would be especially useful for professional drivers, and a good example is the bilateral

[156] Judgement of 21 May 2015, Case C- 339/14; ECLI:EU:C:2015:333

[156] Judgement of 26 April 2012, Case C 419/10 ECLI:EU:C:2012:240.

[157] Judgement of 4 February 2019, Case C- 112/19, ECLI:EU:C:2020:864.

[158] AT, FR, IE, IT, LV, Norway, SI and SE.

[159] BE, BG, the NL, ES, SK, SI and Norway.

[160] National authorities representing GR, the NL, SI, DE, BG, ES and individuals representing non-governmental organisations FIA, IFMC, ACEM, CIECA, ETF, UETR and BVF.

[161] DE

[162] ETF, UETR and BVF.

agreement between the Netherlands and Germany, whereby the system of demerit points/ disqualification system is harmonised for truck drivers from both countries[163].

Several other respondents explicitly suggested that some kind of a harmonised approach at EU level would be welcomed[164]. Nevertheless, national authorities consider harmonisation a complex task with implications on other legislation such as on driving rules, alcohol in traffic, demerit points and criminal law rules, which are not aligned across the Member States.

It is worth noting that at the High-Level Group on road safety on 5 October 2017 in Brussels, the majority of the Member States considered that driving disqualifications should be mutually recognised and there was a preference for an EU-wide approach[165].

5.1.2.6 Objective "Protect novice drivers"

Relevant questions to assess this objective

EQ 2.6 To what extent have novice and/or young motorcycle drivers been protected?

EQ 7 Which factors have contributed to/hindered the achievement of objectives?

The analysis seems to point to an improvement of the road safety of novice drivers, novice motorcyclists and novice moped riders, as a result of the directive. However, this conclusion is mostly based on data analysis, while stakeholder views are more divergent as to the impact of the directive on these user groups.

The directive (article 4) has introduced a new category of driving licences for Mopeds and has limited the direct access to category A driving licences (the licences for driving the most powerfully motorcycles) for motorcyclists younger than 24 years old. They may have access to that category before being 24 years old only if they have held a licence in a lower category (category A2) for at least two years.

Previous literature, as well as the interviews and surveys conducted as part of the support study point to inconclusive findings in relation to the effect of the directive on road safety for these categories of road users (although overall assessment of stakeholders tends to be positive). Nonetheless, the evidence provided in previous studies and by stakeholders during consultations was of a qualitative nature and was not substantiated by data beyond perceptions of stakeholders. While acknowledging the diverging stakeholders' perceptions, on the basis of the statistical modelling conducted, it can be concluded that objective quantitative evidence points to a positive effect of the directive in terms of improving road safety for young and novice riders.

The results of several statistical analyses that were developed indicate that, when the directive was fully in place, it had a positive effect on road fatalities.

[163] BVF

[164] BG, CY, DE, ES and GR.

[165] A non-paper was presented on the mutual recognition of driving disqualifications at the High Level Group on Road Safety 5 October 2017, Brussels.

For powered Ttwo-wheeler (PTW) users (motorcyclists and moped riders), the reduction of the fatality trends for the novice PTWs are greater compared to the middle-aged groups which were not targeted with specific measures by the directive , indicating a positive effect of the Third driving licence directive on road safety for the novice road users.

The results of the data analysis on PTW fatalities show that the third and the second driving licence directive had caused a reduction of 8% in the PTWs fatalities per population in EU countries.

For drivers aged 18-24, the reduction of fatality rates was 4.9% per year, whereas for the middle-aged drivers (aged 25-64, who are not directly affected by the directive) fatality figures may have decreased by 0.6% per year for the 25-49 age category, and increased by 1.7% per year for the 50-64 age group respectively.

Finally, the results of the analysis of Novice Drivers Fatalities show that presence of the third driving licence directive fully implemented may have caused a reduction of 21.3% on the novice driver fatalities per population in EU countries.

The implementation study[166] pointed to the fact that the new system for category A has improved road safety and driver education, namely by preventing young people from riding at an age where they are more prone to risky behaviour. Another benefit is that motorcycle riders continue using less powerful bikes for a longer period, as evidenced by the increase in A2 vehicles in the market.

According to the implementation study on driver training, testing and medical fitness[167], age and inexperience play a key role in explaining the number of casualties for this road user group. Some literature review suggests that formal instruction may not always have a direct effect on safety. Some authors[168] note that, although in theory professional driving instruction improves driving skills, these skills do not always transfer to the real world when young drivers drive without supervision.

The literature review also indicates that the progressive access to a category A driving licence is perceived positively in terms of road safety by national authorities. It must also be noted that in the answers to EQ7[169] stakeholders have indicated that the provisions on the introduction of minimum age limits, minimum testing requirements and graduated access system for motorcycle licences where key developments for road safety.

The interviews have shown that it is difficult to assess whether the directive has led to better protection of young and novice riders, but in general it was suggested that progressive schemes are beneficial. In the ***targeted surveys,*** only 8 out of 32 *national authorities* considered the directive to have had a positive effect on novice and young drivers in terms of road safety. *Non-*

[166] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[167] European Commission (2017), Study on driver training, testing and medical fitness. Report drafted by TRL, SWOV, BASt, Loughborough University, Monash University.

Groeger, J. A., & Banks, A. P. (2007). Anticipating the content and circumstances of skill transfer: unrealistic expectations of driver training and graduated licensing? Ergonomics, 50(8), p. 1250-1263.

[169] Which factors have contributed to/hindered the achievement of objectives?

governmental stakeholders have a different opinion (20 out of 41 responded that the directive improved road safety for young and novice drivers).
In the Interviews with national authorities, 5 out of 8 interviewees indicated that novice and/or young motorcycle drivers are sufficiently protected[170].

In the Open Public Consultation, 54% (302) of respondents found that the graduated access system for motorcycle licences had very little impact on, or did not at all lead to, an improvement in road safety[171].

In the *interviews with non-governmental authorities,* 4[172] out of 8 interviewees highlighted that young and motorcycle riders are sufficiently protected under the directive.

5.1.2.7 Factors that contributed to or hindered the achievement of objectives

EQ 7: Which factors have contributed to/hindered the achievement of objectives?

The analysis found that several factors may have had a positive contribution to the two general objectives of the directive, improving road safety and free movement. They include the achievement of both the specific objectives of protecting young drivers and improving skills of professional and non-professional drivers, as well as the achievement of the operational objectives, which include the harmonisation of minimum standards for driving examiners (including quality assurance and regular periodic training), minimum testing requirements for drivers, medical examinations for professional drivers, minimum age per categories, and progressive access to a category A licence.

On the other hand, the achievement of the objective of road safety is likely to have been hindered by the absence of EU measures for the mutual recognition of driver disqualifications.

Concerning the achievement of the general objective of improved free movement of citizens, it has been positively affected by the harmonisation of the EU driving licence rules, particularly mutual recognition, harmonisation of driving licence categories and vehicles' definitions, the Community Model driving licence, RESPER and minimum age limits per category. On the other hand, the achievement of the objective has been hindered by the definition of normal residence, the absence of a framework for mutual recognition of driving licences issued in third countries, and the continued use of old national driving licence models (until 2033).

Positive and negative unexpected effects of the directive

EQ 8: Has the directive led to any positive or negative unexpected effects?

[170] BE, DE DK, GR and SI.

[171] A large proportion of the respondents that expressed a negative view concerning the effectiveness of graduated access originated from the NL (227 respondents) The respondents from the NL emphasised that particularly category A1 motorcycles have insufficient power which could have implications in terms of road safety when it comes to driving on highways.

[172] STR, FIA, ACEM and BVF.

The two main unexpected effects of the directive seem to be: driving licence tourism as a result of lack of operability of the provision on normal residence; and an increased number of unlicensed motorbike riders due the cost and complexity of the progressive access system to category A driving licences.

During the interviews, four national authorities[173] indicated that the rules regarding the normal residence and driving licence tourism are the cause of a major negative unexpected effect.

In the *targeted survey with national authorities*, when asked whether there are any challenges related to the definition of normal residence, the majority of the respondents (22 respondents representing 20 countries) agreed that there are some challenges related to the **definition of normal residence** and the 185-days rule foreseen in the directive.[174] The challenges reported by the authorities come from the difficulty in applying the definition of normal residence to certain types of residents and situations, particularly for:

- Students, pensioners or other persons that have short term stays on the territory of another Member State[175] or persons whose driving licence needs to be renewed after moving to another Member State [176]
- EU citizens who have their normal residence outside the European Economic Area (e.g. Danish citizens who have their residence in Greenland)[177]
- Persons who emigrate from third countries[178]
- Persons whose driving licence has been lost, expired or stolen[179]
- Persons with a secondary house or who spend 185 days on the territory of another Member State in a manner fractioned over time [180]
- Persons who meet the conditions of normal residence in more than one Member State at the same time[181]
- Where the definition of normal residency has been legally challenged by applicants within an international protection process or illegal residents[182]
- Difficulties in checking and establishing normal residence (e.g. difficult to determine the start of the 185 days period as residents are not required to register when they enter the country[183] and to calculate the 185 'per calendar year[184])

[173] BE, NL, GR and BG

[174] AT, BG, BE, CY, DK, FI, DE, GR, IT, IE, LV, LU, LT, NL, RO, SK, SI, ES, SE and Norway.

[175] CY, DK, FI, DE and LV.

[176] BE.

[177] DK and Norway.

[178] SE

[179] BE and LU

[180] AT and LU

[181] BE

[182] IE

[183] CY, DK, FI, DE and RO

[184] GR

- Lack of clarity on how personal and occupational ties can be proven[185]
- Lack of a harmonised method for proof of normal residence[186]

However, in the targeted survey with national authorities, 5 mentioned that there are no challenges with the definition of normal residence and the 185-days rule[187] and the remaining respondents did not know or were not able to provide an assessment[188].

Secondly, the findings from the desk research pointed to an **increased number of unlicensed novice drivers** in some countries as a result of the introduction of the category AM for mopeds and the graduated access system for motorcycles.

According to the existing studies, the number of unlicensed riders involved in traffic accidents in some countries has increased. For example, a Norwegian study[189] that analysed all of the fatal accidents involving motorcycles from 2005 to 2009 found out that driving without a licence accounted for approximately 20% of the fatal accidents. Those studies pointed out that unlicensed drivers had not been trained and had not passed a driving test; therefore, they lacked the necessary skills and their driving was often associated with extreme behaviour. More than one third of all accidents triggered by extreme behaviour involved unlicensed drivers. Similarly, a Swedish study[190] concluded that the proportion of riders without a licence accounted for 25% of all fatal motorcycle accidents from 2005 to 2010. The study also concluded that new requirements in relation to the A category driving licence have not led to reduced accident rates. On the contrary, the proportion of killed riders that did not possess a valid licence increased every year.

A number of consulted stakeholders suggested that the graduated access to motorcycle driving licences is perceived to be more complex and costly for novice riders.

Apart from the two Scandinavian studies mentioned above and based on the answers in the *survey with non-governmental stakeholders,* it is impossible to assess whether the number of unlicensed (and untrained) motorcycle riders has increased over time. While 17 out of 38 survey participants were unable to provide an assessment in this regard, 11 (29%) participants considered the number of unlicensed and untrained motorcycle riders to have decreased, while 10 respondents (26%) indicated that the number of unlicensed and untrained motorcycle riders have not been reduced. On the other hand, a vast majority of the respondents in the *survey with national authorities* (29 out of 32) indicated that the directive did not have any effect on road safety for unlicensed drivers (the number of road fatalities and serious injuries at national level for this category of drivers). Only two authorities provided positive assessments in this regard and one national authority indicated a negative impact on road safety for unlicensed drivers.

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185 LT and NL

186 SI and SK

187 CZ, HR, EE, HU and PL

188 FR and Iceland

189 Statens vegvesen (Norwegian Public Roads Administration), 2011: Special Analysis. Fatal Motorcycle Accidents 2005-2009 (report found on the website of Norsk Motorcykkel Union (the Norwegian Motorcycle Union) NMCU: https://nmcu.org/wp-content/uploads/2016/12/Analysis-fatal-motorcycle-accidents-2005-2009.pdf)

190 Sveriges Motorcyclister (Swedish Motorcyclists), 2015: Extreme Behaviour – Mainly a Question of Driving without a Licence, version 2.0 https://www.svmc.se/smc_filer/SMC%20centralt/Rapporter/2016/Extreme_behaviour_V2_0_2016.pdf

In the Open Public Consultation, 54% (302) of respondents found that graduated access led very slightly or did not lead at all to improving road safety. Nevertheless, a large proportion of the respondents that expressed a negative view concerning the effectiveness of graduated access originated from the Netherlands (227 respondents). The respondents from the Netherlands emphasised that in particular, category A1 motorcycles have insufficient power which could have implications in terms of road safety when it comes to driving on highways.

The interviewees indicated several other aspects where the directive generated unexpected effects. Specifically, these related to the postponement of training and testing by motorcycle riders, discrimination against below-average size riders at examination, and a limited incentive for young motorhome drivers to obtain category C driving licence due to high costs. These aspects were generally perceived as being negative effects by the stakeholders consulted.

5.2 Efficiency

The directive introduced several novelties that could be associated with costs and extra administrative burden for citizens, including: the introduction of the new EU driving licence model; the introduction of progressive access to category A licences; and the introduction of harmonised administrative validity periods for driving licences. Therefore, in this subsection we assess the actual costs and their possible variation compared to the benefits the directive has generated. Any potential for simplification and reduction of unnecessary regulatory costs is also identified.

Possible existence any excessive costs / negative impacts

EQ 9: Has the directive resulted in any excessive costs / negative impacts?

Costs and administrative burden for citizens

The analysis indicates, based on stakeholder views, that the introduction of a common Union model for driving licences did not lead to major changes in the costs incurred by citizens to obtain a driving licence, as compared to the situation prior to the directive. However, it is difficult to establish a baseline cost without any directive in place and thus assess the impact of the directive itself. There is very little data to quantify any costs related to the directive.

The introduction of the new Union licence model was one of the changes introduced by the directive, and was introduced by Article 1 of the directive. The new Union licence model, based on an ISO standard, has been adopted by many Member States after the adoption of the directive, and even before its entry into force[191].

The new Union licence model did not bring about significant changes in the organisation of the licensing system. While most European citizens must visit a public administration office to apply for a driving licence, some Member States offer this service on a web platform.

The implementation study showed that the cost for obtaining a driving licence was not substantially affected by the implementation of the Union licence model[192]. Small increases were nevertheless found in eight Member States and in one EEA country[193]. The increase in fees could be reasonably traced to the production cost of the credit card licence in two countries (Norway and Poland). The other changes could not be explained by the study. By contrast, in a few Member States the fees for the issuance of a driving licence actually dropped[194].

Thus, overall, the data points to some increase in the costs associated with obtaining a driving licence, but these changes are not consistent across Member States.

[191] AT, BG, CZ, EE, FI, DE, HU, IT, LV, LT, MT, NL, PL, PT, SK, SI, ES, SE. Iceland also adopted the Union Model.

[192] Only the costs associated with the administrative process and the document, and no other costs such as driving school costs, test fees or costs for medical checks and first aid courses.

[193] The increase amounted to between a few eurocents and approximately EUR 25. Increases in fees were noted in BE, HR, GR, IE, LT, PL, MT, SI, and in Norway.

[194] CY and FI.

In the targeted interviews, 12 out of 20 *national authorities*[195] indicated that there had not been any notable changes in fees and, where they had occurred, they were related to yearly updates of fees and normal indexation. The assessment of the authorities in the interviews was similar when it came to the processing time for issuing, exchanging, replacing, and renewing driving licences, i.e. the time needed remained broadly the same.

The survey of *non-governmental stakeholders* showed a mixed picture in terms of the overall assessment of whether the procedures regarding first issue, renewal, exchange, and replacement of professional and non-professional licences have become less costly and complex.

The implementation study indicates that shorter validity periods and the requirement for professional drivers to undergo regular medical checks are, in general, considered to lead to potentially higher costs for citizens and a higher administrative burden, given the requirement for citizens to renew their driving licences and to bear the corresponding costs (e.g. for medical exams).

The harmonised rules on administrative validity periods

The analysis led to mixed findings concerning the potential costs generated by the introduction of the harmonised rules on administrative validity periods. In the implementation study more than half of the Member States assessed the new rules to have had no effect on the costs for citizens for first issuing, exchange or replacement of driving licences. Two Member States[196] considered the costs to have decreased when it comes to renewal. On the other hand Desk research and interviews with national authorities[197], indicated that shorter validity periods led to increased costs for citizens and an administrative burden, particularly in Member States which had unlimited validity periods before the directive applied, since the directive now requires that licences be renewed every 10 or 15 years.

The directive stipulates that driving licences for categories A and B shall have an administrative validity period of 10 years, but Member States may choose to issue such licences with an administrative validity period of up to 15 years. The directive further stipulates that driving licences for categories C and D have an administrative validity period of 5 years. According to the directive, the renewal of a driving licence upon expiry of the administrative validity period is subject to continued compliance with the minimum standards of physical and mental fitness for driving set out in Annex III to the directive, and normal residence in the territory of a Member State issuing the licence. The directive stipulates that when renewing driving licences in categories A and B, Member States may require an examination applying the minimum standards of physical and medical fitness. The directive allows Member States to limit the administrative validity period of the licence for novice drivers, and also for drivers who have reached the age of 50, to improve road safety.

Concerning the harmonised rules on administrative validity periods, the implementation study found that more than half of the Member States assessed the new rules to have had no effect on

[195] AT, CZ, DE, IT, LV, LT, LU, NL, SK, SI, ES and SE.

[196] PT and HU.

[197] BE, NL, SI, FI, DK, GR and BG.

the costs for citizens for first issuing, exchange or replacement of driving licences. Two Member States[198] considered the costs to have decreased when it comes to renewal. 11 Member States indicate that the costs have increased in the case of renewal.[199]

Desk research and interviews with national authorities[200], indicated that shorter validity periods led to increased costs for citizens and a higher administrative burden, particularly in Member States which had unlimited validity periods before the directive started to apply, since the directive now requires that licences be renewed every 10 or 15 years.

The majority of the national authorities interviewed indicated that the uniform administrative validity and the medical fitness requirements increased the administrative costs and the burden for national authorities and also for citizens. Interviews with non-governmental stakeholders[201] further corroborated this finding as interviewees indicated that the costs are generally higher for citizens due to the limited validity periods.

Despite the increase in costs, national authorities still viewed the changes positively due to the benefits emerging from the harmonised rules on administrative validity periods – particularly the free movement of persons and the reduction of fraud. Non-governmental stakeholders[202] were of the same opinion.

When it comes to the costs and burden incurred by professional drivers, the *open public consultation* indicates that the general perception is that the introduction of shorter administrative validity periods led to higher costs.

Concerning the rules on progressive access to category A driving licences

The analysis signals that the level of complexity of the system for progressive access introduced by the directive has led to increased costs[203] for applicants, although some stakeholders consider that the advantages in terms of road safety outweigh the costs.

Under the directive, an applicant wishing to obtain a full category A licence will have to take more training modules and more tests, resulting in an increase in the total cost[204]. Estimates provided by the Federation of European Motorcyclists estimates that the costs for obtaining an A licence in Europe can range between EUR 800 to EUR 3,000.

The *targeted survey with non-governmental stakeholders* further supports the finding that overall there was an increase in the costs and requirements associated with category A licences under the graduated access system.

198 PT and HU.

199 AT, BE, HR, FI, DE, IE, LV, NL, PL, ES and SE.

200 BE, NL, SI, FI, DK, GR and BG.

201 FEMA, FIA, FIM, EFA,, IRU, ETF, BVF, IFMC, and ACEM.

202 BVF, FIA, ACEM, EFA, FIM

203 Although those costs cannot be quantified based on available information

204 In DE, higher costs for the A driving licence are applied, but lower costs apply for an AM licence; in the LU, the total costs are higher because of the combination of A2 and A to get a full category A licence; in the NL, the costs are higher due to the requirement to pass 4 theoretical and practical tests for progressive access; in SE, additional costs are incurred for a practical driving test.

In the interviews, most national authorities stated that the directive resulted in higher costs[205] and waiting times for obtaining a licence under the progressive access system. One authority said that despite the higher costs, the progressive access system does not impose a significant burden on applicants[206]. Two authorities [207]reported no major changes. National authorities[208] also highlighted certain benefits related to the system of progressive access to category A licences, particularly when it comes to road safety, due to increased focus on training and examination through the staged approach. One authority[209] considered there to be no evidence that the progressive access system contributed to better education, training curricula or road safety.

The possible existence of significant differences in costs between Member States

EQ 10: Are there any significant differences in costs between the Member States, and what is causing them?

Driving licence fees

The analysis found significant variation in the cost of driving licence fees applied in Member States.

The directive does not contain any provisions directly regulating the cost of driving licences or training, such costs are entirely within the remit of Member States.

First-time application

Significant differences are found in the *driving licence fees* incurred in Member States. For a first-time application, they vary between EUR 175 and EUR 6 (categories A, B) and between EUR 218 and EUR 8 (categories C and D). For exchange, the fees vary between EUR 145 and EUR 7 (categories A, B) and between EUR 208 and EUR 7 (categories C and D).

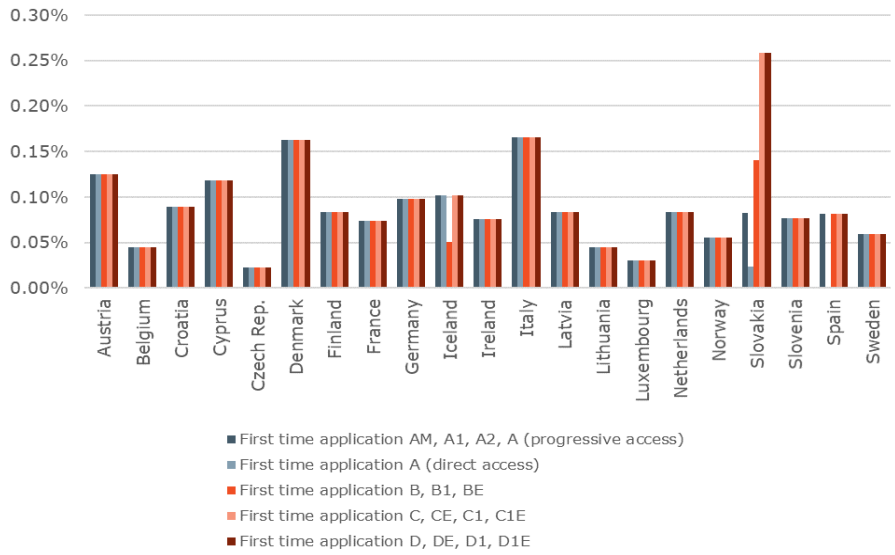
[205] BE, NL, FI, GR, DK and NL.

[206] DE.

[207] SI and BG.

[208] SI, FI, GR, BG and DE.

[209] NL.



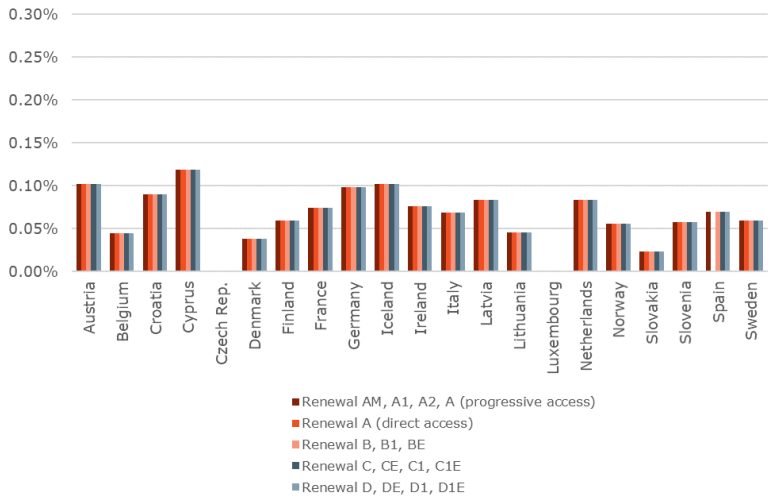
Costs for first time driving licence application (as % of GDP per capita) (2019)

Source: based on Eurostat and road safety statistics

Costs for driving licence renewal

Citizens incur approximately 30% lower costs as compared to first application when renewing their driving licence, and the average cost for renewal ranges between EUR 31 (for category A progressive access) and EUR 34 (for category D). The main causes for variation in costs are associated with the national requirements and the level of efficiency of national administrations.

Costs for driving licence renewal (as % of GDP per capita) (2019)



Differences in costs and fees applied by the Member States are most likely explained by the set-up of the administrations when it comes to taxation rules and the set-up and levels of efficiency of the administrations. According to the implementation study[210], most Member States (20 out of 27) have driving licence systems that are solely run by the public administration. Four Member States[211] involved private service providers. However, when comparing the fees of public versus private providers there seems to be no clear indication of the efficiency of one model over the other.

Fees for exchange driving licences

The fees applied for exchange of third country driving licences are on average slightly lower than the fees for first time issuance of a driving licence. Citizens that exchange their third country driving licence pay on average between EUR 46 for exchanging a category D driving licence, and EUR 28 for exchanging a third country driving licence through direct access[212].

Training costs

The analysis evidences that there are substantive differences in terms of the training costs across Member States.

For instance, the costs of obtaining a **category A** driving licence, through progressive access, varies between EUR 300 in Greece and EUR 2,000 in Luxembourg. The training costs associated with obtaining a category A driving licence through direct access are substantively lower and vary from EUR 200 in Latvia and Hungary to EUR 600 in Luxembourg and Norway.

Training costs associated with **category B licences** also tend to vary across Member States, ranging from EUR 420 in Ireland to EUR 2,000 – 2,500 in countries such as Denmark, Finland, Luxembourg, and Norway.

Similarly, training costs for **category C and D licences** vary widely. In the upper range, costs vary from EUR 2,000 up to EUR 4,000 in countries such as Denmark, Finland, Norway, and Luxembourg. In the lower range, training costs can be as low as EUR 500 in Ireland.

The differences in *training costs* can be explained by differences in the training requirements in terms of the number of lessons (theoretical and practical, formal or informal) and the national and regional specificities in terms of the market for the provision of driving licence training. Finally, cost differences are also driven by other national requirements related to the training or preparation for the examination. Such costs can include costs for specialised training (e.g. cost of first aid course), costs for medical examinations and ophthalmologist checks, administrative costs (e.g. photo cost, municipality fees), costs for test repetition, and costs for an interpreter (where needed).

[210] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[211] FI, IE, LT and MT

[212] You can obtain your full (category A) motorcycle licence using the direct access scheme if you're aged 24 or over according to point c) (i) of Article 4(3) of the directive.

EQ 11: Is there a potential for simplification and reduction of the regulatory burden caused by the directive, for instance through further digitalisation or better exploiting?

The analysis seems to indicate that there are several areas with potential for simplification and reduction of the administrative burden, e.g. an administrative simplification of driving licence renewal; the medical checks for professional drivers; the progressive access to category A licences; the rules related to weight limits for category B licences (e.g. in case of motorhomes); and the administrative processes related to the establishment of the normal residence. Digital solutions such as digital driving licences are insufficiently explored at present, and the use of RESPER could offer further potential for reduction of the administrative burden.

The implementation study revealed several areas of potential for simplification and reduction of administrative burden; which is also confirmed by data collected in the targeted surveys, interviews and the open public consultation. Those areas are the following:

- The progressive access to category A licences which is perceived by the users as highly complex and costly
- The requirements related to normal residence could be further simplified[213].
- Some stakeholders indicated that they perceive the current weight limit of category B licences (3,500 kg) as imposing unnecessary burdens on motorhomes and other larger service vehicles and may lead to additional costs.[214].
- Digital solutions and digitalisation of driving licences are insufficiently explored. The *survey with the national authorities* revealed that digital driving licences are issued in only six countries[215]. National authorities and non-governmental stakeholders[216] also indicated that there is a general interest in introducing digital driving licences. However, there are currently no common EU standards related to digital driving licences and also no clear guidelines in the directive[217]. Moreover, the roll-out of digital driving licences may also lead to additional costs both for authorities and citizens[218].

[213] Interviews with national authorities of BE, SI and DK, highlighted that checking compliance with the rules for normal residence is cumbersome both for the authorities and for citizens.

[214] IFMC, European Caravan Federation. According to the IFMC, 85% of the fleet that is running on the roads is running overload. Specifically, motorhomes are checked relative to the weight limit and penalties are imposed for those that do not comply. The penalties that are applied can vary: in DE - 235 EUR, ES - 4,600 EUR and AT - 5,000 EU.

[215] Norway, Iceland, DK, ES ,PL and PT

[216] FIA, IFMC, BVF.

[217] FI, DE, LU, NL, SE

[218] Norway, Iceland and ES.

5.3.Relevance

This subsection assesses whether the objectives of the directive are still in line with the current needs or problems, how the situation/context as regards the provision of the directive in the EU has evolved and whether the directive still matches current needs. It also assesses whether its scope is still fit for purpose; and whether the four key areas currently covered under the technical guidelines and specifications are sufficient to respond to the evolved needs, given technological developments.

The future proof of the directive

EQ 12: Do the objectives incorporated in the directive match the needs of today and the foreseeable future?

The analysis indicates that the objectives of the directive are still relevant, but the means to achieve those objectives need to be updated, especially when it comes to raising the drivers' skills. The current provisions on driving education and testing do not seem to have matched the pace of technological development, both in terms of vehicle technology (advanced safety and efficiency features, alternative fuels, intelligent transport systems, automated driving, and micro-mobility solutions) and digital information.

The implementation study pointed to the fact that the current and future needs arising from rapid technological and legal developments affected the scope of the directive.[219]

The stakeholders consulted in targeted consultations generally assessed the current directive as not sufficiently adapted to the use of technological advances such as advanced driver assistance systems, alternative fuel vehicles, intelligent transport systems, and automated driving functions. The results of the survey with non-governmental authorities can be found in Annex V (Table 5).

In the open public consultation, the opinions were more split when it came to the extent to which knowledge requirements for obtaining a driving licence are adapted to new technologies. Slightly more than 50% (282) of the respondents considered the requirements to obtain a driving licence to be adapted to a great extent or to a some extent. At the same time, 38% (206) of respondents assessed that the requirements were "very little" or "not at all" adapted to new technologies fitted to vehicles. Opinions were split across the various types of stakeholders. Notably, a large proportion of EU citizens, NGOs and trade unions considered the driving licence requirements to be "very little" or "not at all" adapted to new technologies.

[219] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

The appropriateness of the current age limits

EQ 13: Are the minimum age limits established in the directive appropriate for current social needs?

The analysis of existing studies, statistical analysis of road safety for young riders and drivers and the results from the interview and survey analysis indicate that the minimum age limits established in the directive are broadly adequate. However, a few suggestions were put forward to better reflect social needs in this regard.

The directive (article 4) provides a lot of flexibility to Member States when it comes to establishing the minimum age at which a person is allowed to drive. The directive only sets a minimum age depending on the category of driving licence (it ranges from 16 years old for category AM, to 24 years old for categories D and DE). In certain instances, the directive even allows Member States to raise or lower the minimum age limits applicable in their territory.

The literature indicates that the inexperience and young age of drivers are the most important factors leading to the overrepresentation of young and novice drivers in traffic accidents[220].

For this reason, accompanied driving for the category B licence is regarded positively in existing research and by the stakeholders consulted. Some Member States' authorities also supported the idea of regulating accompanied driving at EU level, in particular for category B licences.

In the *survey,* the majority of *non-governmental stakeholders* (20 out of 36) indicated that the minimum age limits are appropriate. 12 respondents disagreed with this statement, and 4 could not provide an assessment. A large proportion of respondents (20 out of 41) indicated that there are no particular issues concerning the interpretation, application, and enforcement of minimum age limits in the directive, while more than a third (14) perceived the opposite to be true.

In this context, stakeholders representing transport employers have advocated reducing the minimum age for accompanied driving in a professional context[221]. Regarding professional driving, this question is linked, and should be assessed in conjunction with the provisions of directive 2003/59/EC on the initial qualification and periodic training of truck and bus drivers. directive 2003/59/EC provides for the possibility to lower the minimum age for category C and D driving licences under certain conditions (if they have completed a 280 hour training course).

[220] European Commission (2017), Study on driver training, testing and medical fitness. Report drafted by TRL, SWOV, BASt, Loughborough University, Monash University.

[221] IRU suggested reducing the minimum age for trained young professional truck drivers to 17 years under the condition that they were duly accompanied by a competent and experienced professional driver. This contrasts with another respondent (ETF), that considers reducing the minimum age for professional drivers to under 18 would not be favourable. The latter respondent further explained that the industry is pushing for a lower minimum age with the argument that this would solve the issue related to the shortage of drivers, however the latter respondent believed that the shortage of drivers is caused by other factors, e.g. general working conditions that are not particularly appealing for young people.

Are current and future road users covered by the scope of the directive?

EQ 14 To what extent are all the types of current or potential road users covered by the directive, given new mobility solutions such as micro-mobility and electric bicycles and scooters? Are there significant differences among Member States, or among age groups?

The analysis indicates that not all types of current road users are covered by the directive, especially in the case of new mobility solutions, such as micro-mobility and electric bicycles and scooters.

New transport modes, offering new solutions of micro-mobility such as electric scooters, bikes and mopeds have increased in popularity among road users. Such new forms of transport are acknowledged by the European Commission in its Communication 'Road Safety Vision Zero'222 as both an opportunity as well as a challenge in terms of ensuring a safe framework for their use. Under the current EU driving licence rules, an AM driving licence (or higher category, depending on maximum design speed and the maximum continuous power level) is required for electric bicycles with a maximum speed above 25 km/h. However, presently there is no EU framework regulating such new micro-mobility forms and Member States have been regulating such new micro-mobility forms in different manners.

Consulted stakeholders raised concerns related to the absence of an EU common framework for regulating new micro-mobility solutions in particular when it comes to road safety. Evidence from interviews with non-governmental stakeholders and national authorities point to the fact that the use of micro-mobility devices should not be regulated at EU level, in particular that there is no need to an EU regulation concerning the driving licence for micro-mobility devices.

In the survey with non-governmental stakeholders the majority of stakeholders (21 out of 28[223]) disagreed or strongly disagreed that the directive sufficiently addresses micro-mobility solutions.

Given that there is no legal framework at EU level for traffic rules, the use of micro-mobility devices such as electric scooters or e-bikes is not regulated at EU level. Under the directive, a driving licence of category AM is required for two and three-wheel vehicles with a maximum speed above 25 km/h. Therefore most micro-mobility devices fall outside the scope of the directive.

Nevertheless, evidence from *interviews* with non-governmental stakeholders and national authorities does not unanimously point to a view that such micro-mobility solutions should be regulated at EU level. Whereas some stakeholders indicate that there is a need for regulating the area due to the safety challenges it poses, other stakeholders identified the need for more evidence before concrete recommendations are put forward.

[222] Commission Staff Working Document 'EU Road Safety Policy Framework 2021-2030 – Next steps towards 'Vision Zero', SWD (2019) 283 final.

[223] 4 automotive and motorcycle federations, 4 driving school associations, 7 road safety and road users' associations, 7 'other', 1 vehicle manufacturers' association.

In this legal context, Member States have, over the past three or four years, gradually adopted national legislation defining the rules for the use of micro-mobility devices. Most Member States do not require a driving licence for this type of vehicle.

Adaptation of the directive to demographic trends

EQ 15 To what extent are the provisions on driving licence renewal adapted to demographic trends such as an ageing population?

The analysis indicates the importance of considering the safety of older drivers. However, this should not compromise the possibility for them to remain active and independent at an older age. There is no conclusive evidence that fitness screening based on age provides significant road safety benefits. However, stakeholders have indicated that more attention should be paid to the high health-risk drivers. Another conclusion of the analysis is that the increased mobility of citizens within the EU is causing difficulties in obtaining a driving licence in situations of insufficient command of the official language of the country of residence.

Europe is increasingly being faced with the challenge of population ageing. There are no upper age limits in the European Union for holding a driving licence.

The study on driver training, testing and medical fitness[224] suggests that there is a lack of evidence that a general age-based system, and currently available screening assessments, have substantial safety benefits.

In the survey, non-governmental stakeholders considered whether the directive addresses the current and future needs of an ageing population. 16 out of 41[225] respondents considered that the directive addresses current and future needs, while 9 out of 41 consider that it does not[226]. However (when disregarding 12 respondents who could not provide an assessment) more than half of the remaining respondents (16 out of 29) disagreed or strongly disagreed that the directive has led to improved road safety for older drivers, while slightly less than half indicated that road safety has been improved for older drivers. According to the respondents, a medical examination upon renewal should be required for driving licence holders of all driving licences and should not be based on self-declaration.

In the interviews with national authorities, three[227] respondents indicated that the directive provides sufficient opportunity for Member States to impose medical check-up requirements

[224] European Commission (2017), Study on driver training, testing and medical fitness. Report drafted by TRL, SWOV, BASt, Loughborough University, Monash University.

[225] 1 automotive and motorcycle federations, 1 drivers association, 6 drivers school associations, 5 road safety and road users associations, 1 vehicle manufacturer association, 2 'other category'.

[226] 3 automotive and motorcycle federations, 3 road safety and road users associations, 1 vehicle manufacturer association, 3 'other category'.

[227] BG,GR and SI

according to their own national contexts and 3 other respondents[228] indicated that more could be done in this regard.

In the interviews with non-governmental stakeholders, several expressed concerns in terms of the balance between safety requirements and the need for the older generation to stay active and mobile. 3 stakeholders made the point that older drivers must have the possibility of remaining mobile[229], and 2 expressed their concerns regarding age-based medical screening[230].

The existing research has showed that the fatality rate for the category of drivers aged above 75 years is the second highest among all age groups[231]. However, this higher fatality rate is to a significant extent the result of physical vulnerability, rather than higher crash risk. In any case, a medical examination is currently required by the directive for drivers holding licences of categories C and D and some Member States have extended this obligation to categories A and B.

In the context of an increased mobility of citizens within the EU, it is becoming more common for some citizens to experience difficulties in obtaining a driving licence because they do not have a sufficient command of the official language of the Member State where they have their normal residence. This can be the case for EU and non-EU nationals, as outlined in citizens' questions and complaints handled by the Commission. This is despite the fact that some Member States offer exams in languages other than their official language(s).

[228] BE,FI and NL

[229] FIA, CIECA and ETSC

[230] FIA and ETSC

[231] European Commission (2018). Older drivers, p. 4: https://ec.europa.eu/transport/road_safety/system/files/2021-07/ersosynthesis2018-olderdrivers.pdf

5.4 Coherence

This subsection assesses whether the directive is internally consistent and whether the legislation is consistent with relevant EU and international interventions in the area of transport, road safety, automation, digitalisation and type-approval.

5.4.1 Internal coherence of the provisions of the directive

EQ 16: To what extent are the provisions of the directive coherent and consistent with one another? Are there any overlaps, contradictions or inconsistencies?

In general terms, the analysis does not find any substantial inconsistencies among the provisions of the directive. That said, some stakeholders pointed minor inconsistencies in the equivalence rules and in the insufficient precision of Annex III on standards on alcohol, drugs and medicinal products.

In this section we analyse the internal coherence of the directive, namely if the provisions of the directive are coherent and consistent with one another, or if there are any overlaps, contradictions or inconsistencies between its different articles and annexes.

During *interviews,* 5 out of 9 national authorities did not believe that major inconsistencies exist within the directive.[232] 3 authorities[233] mentioned the difficulty in applying the rules on normal residence. One Member State[234] mentioned some inconsistency regarding the equivalence rules. For instance, the category DE driving licence allows the holder to drive a category D1E vehicle, whereas CE licence does not provide the same opportunity to drive a category C1E vehicle. The implementation study also noted that the provision on normal residence needs to be fine-tuned to be more easily and more consistently applied[235].

In the *survey with non-governmental stakeholders* and in *interviews with national authorities,* it was suggested that the Standards on Alcohol and Drugs and Medicinal Products (points 14 and 15 of Annex III to the directive) could be more precise; the provisions related to diabetes mellitus (point 10 of Annex III) were also found to be in need of an update.

[232] BE, BG, FI and SI.

[233] GR and NL.

[234] NL

[235] The problems related to the definition of normal residence are fully detailed in section 5.1.2.7 (Positive and negative unexpected effects of the directive.

5.4.2 External coherence of the directive with other legislation

Relevant questions to assess this objective

EQ 17 Are there any inconsistencies/gaps/overlaps between the directive and other legislation at international level which has similar objectives, and in particular with the relevant international obligations of the Member States?

EQ 18.1 To what extent is the directive coherent with other EU legislation in the area of road safety?

EQ 18.2 To what extent is the directive coherent with other EU transport legislation, in particular in the areas of automated driving and digitalisation policies (for example the Cooperative, connected and automated mobility or the digital transport)? Are there any overlaps, gaps or inconsistencies? Are there any complementarities/synergies?

EQ 18.3 To what extent is the directive coherent with other EU legislation such as motor vehicle type-approval legislation, the Digital Single Market and e-Government initiatives in relation to digitalisation?

5.4.3 Coherence with international legislation

The analysis points to a general coherence with the 1949 Geneva Convention[236] on Road Traffic and the 1968 Vienna Convention on Road Traffic[237], despite some punctual inconsistencies.

In the last century, the obligation to hold a driving licence in order to be able to drive came into effect. The Geneva Convention on Road Traffic of 1949 and the Vienna Convention on Road Traffic of 1968 laid down uniform road traffic rules facilitating international road traffic and thereby also increasing road safety. Both conventions specified that drivers of a motor vehicle must be in possession of a valid driving permit if they want to drive in other countries.

The general coherence of the directive with the Geneva Convention on Road Traffic and the Vienna Convention on Road Traffic, was confirmed in the *interview*s by 6 out of 9 national authorities.[238] 3 national authorities[239] explained that there is some inconsistency with those two Conventions as they did not fully allow automated vehicles and their requirements on the driving licence format were outdated.

A study[240] highlighted some discrepancies between the categories of the directive and those of the 1968 Vienna Convention on Road Traffic, the latter being less restrictive[241].

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[236] United Nations Convention on Road Traffic Geneva, 19 September 1949- (https://treaties.un.org/Pages/ViewDetailsV.aspx?src=TREATY&mtdsg_no=XI-B-1&chapter=11&Temp=mtdsg5&clang=_en)

[237] United Nations Convention on Road Traffic Vienna, 8 November 1968 (https://treaties.un.org/pages/ViewDetailsIII.aspx?src=TREATY&mtdsg_no=XI-B-19&chapter=11)

[238] BG, DE, DK, FI, NL and SI.

[239] BE, GR and ES

[240] UNECE (2017), International Driving Permit Categories – 1968 Convention on Road Traffic. Available at: https://unece.org/DAM/trans/main/wp1/wp1doc/International_Driving_Permit_Categories.pdf

In the *survey with non-governmental stakeholders*, two respondents mentioned that the relevant UN conventions lack the A2 driving licence category and pointed to inconsistencies between the directive and the Vienna Conventions or UNECE regulations in relation to highway codes (road signs and rules).

5.4.4 Coherence with other EU legislation in the area of road safety and transport

The analysis indicates that the directive is broadly consistent with the EU legislation in the area of road safety analysed for this evaluation, namely:
a) Directive 2003/59/EC (amended by Directive (EU) 2018/645) on the initial qualification and periodic training requirements for professional drivers of trucks and buses;
b) Directive 2015/413/EU on cross-border exchange of information on road safety related traffic offence (CBE directive); and
c) Regulation (EC) No 661/2009 (General Safety Regulation)[242].

No major coherence issues were observed, and the majority of the consulted stakeholders agreed that the directive is broadly coherent with other legislation on road safety. Nevertheless, some punctual issues were identified in the evaluation as mentioned below.

Directive 2003/59/EC (amended by Directive (EU) 2018/645) on the initial qualification and periodic training requirements for professional drivers of trucks and buses

The Impact Assessment[243] that accompanied the proposal to amend Directive 2003/59/EC[244] highlighted that the minimum age to access the profession could lead to discrepancies that could distort competition in the EU, as enterprises in countries that were able to hire younger professional drivers had a much larger pool of potential drivers to hire from compared to companies based in other countries.

The legislative proposal mentioned above resulted in Directive (EU) 2018/645[245] which was adopted in April 2018 and which amended both Directive 2003/59/EC and Directive 2006/126/EC with a view to providing legal clarity as regards the minimum age for certain driving licence categories. It provided for a clear derogation in Directive 2006/126/EC, allowing for category C and D driving licences to be issued at the minimum ages provided for

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241 For example, EU licence category B1 permits only quadricycles to be driven by the holder of a B1 driving licence, whilst the Convention allows tricycles and quadricycles to be driven by the holder of a B1 driving permit

242 Regulation (EC) No 661/2009 of the European Parliament and of the Council of 13 July 2009 concerning type-approval requirements for the general safety of motor vehicles, their trailers and systems, components and separate technical units intended therefor. This regulation will be replaced by the revised General Safety Regulation (EU) 2019/2144 on 6 July 2022

243 Commission Staff Working Document: Impact Assessment accompanying the document Proposal for a Directive of the European Parliament and of 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 or passengers and Directive 2006/126/EC on driving licences (COM(2017) 47 final).

244 And also Directive 2006/126/EC

245 Directive (EU) 2018/645 of the European Parliament and of the Council of 18 April 2018 amending Directive 2003/59/EC on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers and Directive 2006/126/EC on driving licences (OJ L 112, 2.5.2018, p. 29).

in Directive 2003/59/EC on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers.

However, in the *survey of non-governmental stakeholder*s it was mentioned that minimum age limits are too high for some professional driving licence categories and these are not aligned with the philosophy of the EU recommendation on professional training and skills development[246], namely the European qualifications framework which grants a fundamental role to the notion of learning outcomes based on the skills acquired and not the age of the learner. The survey results indicated that there is still some room for improvement concerning Directive 2003/59/EC in particular in relation to the potential recognition of driver qualifications acquired in a third country, and further harmonisation on the minimum age.

The majority of respondents to the public consultation (36%)[247] did not raise concerns regarding coherence with the legislation on training and certification of professional drivers, as they have not faced any issues in this regard. Respondents of Dutch origin tended to increase the percentage of respondents who were faced with problems in this category. When omitting Dutch respondents, who represent a significant majority of the overall respondents, the percentage of respondents who have been faced with issues regarding the training and certification of professional drivers due to incoherence between the directive and the legislation presented in the questionnaire fell from 36% to 29%.

Directive (EU) 2018/645 has also laid out the requirement to issue a driver qualification card to ensure mutual recognition of completed periodic training, as per Directive 2003/59/EC, for every driver in the event that completed training cannot be marked on the driving licence. Previously, some drivers wanting to follow the periodic training in another Member State where they commuted to work, were unable to have the training recognised, because only the Member State where the driver resided was entitled to issue a driving licence. Certain Member States did not issue a driver qualification card, and they were thus unable to provide the mutually recognised Code 95[248] for a resident in another Member State who had undergone periodic training on their territory. This was partly addressed during the *interviews* since some stakeholders suggested that the requirements set out in Directive 2003/59/EC should be taken into greater consideration[249]. For example, the validity periods of Code 95 are currently not entirely aligned.

[246] Council Recommendation of 24 November 2020 on vocational education and training (VET) for sustainable competitiveness, social fairness and resilience (2020/C 417/01), OJ C 417, 2.12.2020, p. 1

[247] 199 out 546 respondents.

[248] The directive uses letters to identify the different categories of driving licences (for ex: A, B, C, D etc.) but it also further refines the conditions to drive by using (if needed) harmonised European Union codes (from 01 to 99), or a national codes (codes 100 and above, valid only for driving in the territory of the Member State which issued the licence). These codes are printed on the back of the driving licence. A code 95 is an EU code that certifies that the professional freight and passenger transport driver went through appropriate training and test and therefore possess a driver Certificate of Professional Competence.

[249] FI, DE and ETF.

Directive 2015/413/EU on cross-border exchange of information on road safety related traffic offence (CBE directive) [250]

The European Commission's implementation study[251] of 2016 on the application of the CBE directive concluded that this directive complements the driving licence directive, as it ensures awareness of, and compliance with, road traffic rules in force in Member States different to the Member State of residence, and is thus filling a legal gap regarding the cross-border enforcement of road traffic rules. The Commission is currently finalising the analysis on whether the CBE directive could be further improved to better support the enforcement of mutual recognition of driving disqualifications[252].

In regard to the legislation on cross-border enforcement of traffic rules, most respondents to the public consultation (287 put of 546) indicated that they have not faced any issues in the past due to potential incoherence with the directive.

Regulation (EC) No 661/2009 and Regulation (EU) 2019/2144 (General Safety Regulation)

In the survey with non-governmental stakeholders one stakeholder also pointed out a possible inconsistency between the directive and the revised General Safety Regulation (replacing the current one on 6 July 2022). The General Safety Regulation mandates that all new cars put on the market as of July 2022 will have to be equipped with a set of mandatory advanced safety systems (ADAS). As a result, according to those stakeholders the revised directive should give special consideration to current and future technological advances such as ADAS.

The implementation study[253] pointed to the need to improve driver education and tailor it to technological advances, to consider the limitations of the current framework when it comes to automated driving, and to consider the need for increased sustainability which may prompt users to consider environmentally-friendly mobility solutions, such as electrically powered or other alternative fuelled vehicles. The feedback from interviews has pointed out that the education requirements do not cover ADAS, or new vehicles such as light mopeds. [254]

In the same regard, the Report of the High-Level Group on the Competitiveness and Sustainable Growth of the Automotive Industry in the European Union (GEAR 2030)[255] suggested that driver education is vital for the successful implementation of highly automated

[250] Directive (EU) 2015/413 of the European Parliament and of the Council of 11 March 2015 facilitating the cross-border exchange of information on road safety related traffic offences (OJ L 68, 13.3.2015, p. 9).

[251] European Commission (2016), Evaluation Study on the Application of directive 2011/82/EU Facilitating the Cross-Border Exchange of Information on Road Safety Related Traffic Offences - Final Report. Drafted by Dalila Frisani, Alessandro Zamboni, Céline Monteiro. https://op.europa.eu/en/publication-detail/-/publication/77b97427-3c33-11e6-a825-01aa75ed71a1/language-en directive 2011/82/EU has been replaced by directive (EU) 2015/413 which contains identical provisions but a different legal basis.

[252] In the open public consultation, with Open Public Consultation, in regard to the CBE directive, most respondents (52%) indicated that they have not faced any issues in the past due to potential incoherence with the directive, whereas 11% (i.e. 62) of respondents stated the opposite to be true.Furthermore, the majority of respondents (36%) did not raise concerns regarding coherence with the legislation on training and certification of professional drivers, as they have not faced any issues in that regard.

[253] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[254] FIA, EFA and ETSC.

[255] GEAR 2030. High Level Group on the Competitiveness and Sustainable Growth of the Automotive Industry in the European Union, Final Report – 2017. https://ec.europa.eu/docsroom/documents/26081/attachments/1/translations/en/renditions/native European Commission, 2017.

vehicles. According to the report, the current rules concerning training do not sufficiently cover automated vehicles in situations where the vehicle requests the human driver to take control in, for example, extreme weather conditions, at work sites, or other unreadable situations.[256]

5.4.5 Coherence with vehicle type-approval legislation, the Digital Single Market and e-Government initiatives in relation to digitalisation

The analysis did not find major concerns regarding coherence with type-approval legislation, the Digital Single Market and e-Government initiatives.

The analysis did not raise major concerns regarding coherence with the Digital Single Market and e-Government initiatives[257], but the implementation study and the analysis of the stakeholders' feedback during the interviews[258] identified a few consistency problems with vehicle type-approval legislation. For instance, the directive should provide a possibility to tow trailers with category A vehicles (PTW or tricycles), which is allowed under type approval legislation[259].

In the open public consultation, more than 40%[260] of the respondents reported that they have not faced any problems with type approval legislation, while 19%[261] of the respondents have been faced in the past with problems[262] because of discrepancies between that legislation and the directive. The responses were split quite evenly across different types of stakeholder.

The evaluation also points out that the directive is not sufficiently aligned with the type approval legislation that has been modified (L-category type approval framework)[263].

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256 High Level Group on the Competitiveness and Sustainable Growth of the Automotive Industry in the European Union, Discussion paper (rev1.1-11-06-2016), Roadmap on Highly Automated vehicles. https://circabc.europa.eu/sd/a/3e06f7bf-2719-4be1-9f24-ba6b2975d7eb/Discussion%20Paper%20-%20rev.1%2004-05-2015.pdf.

257 A Digital Single Market Strategy for Europe (COM(2015) 192 final of 6.5.2015); Tallinn Declaration on eGovernment of 6.10.2017 (https://lisboncouncil.net/wp-content/uploads/2020/07/tallinn_egov_declaration.pdf); Council conclusions on the digitalisation of transport of 5.12.2017 (https://www.consilium.europa.eu/en/press/press-releases/2017/12/05/digitalisation-of-transport-council-conclusions/);

The Cooperative, connected and automated mobility initiative (CCAM) in the framework of the European Strategy on Cooperative Intelligent Transport Systems (C-ITS) (https://transport.ec.europa.eu/transport-themes/intelligent-transport-systems/cooperative-connected-and-automated-mobility-ccam_en)

258 DE and ACEM

259 Regulation (EC) No 661/2009 of the European Parliament and of the Council of 13 July 2009 concerning type-approval requirements for the general safety of motor vehicles, their trailers and systems, components and separate technical units intended therefore(OJ L 200, 31.7.2009, p. 1)

Regulation (EU) 2018/858 of the European Parliament and of the Council of 30 May 2018 on the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles, amending Regulations (EC) No 715/2007 and (EC) No 595/2009 and repealing Directive 2007/46/EC (OJ L 151, 14.6.2018, p. 1)

Regulation (EU) No 167/2013 of the European Parliament and of the Council of 5 February 2013 on the approval and market surveillance of agricultural and forestry vehicles(OJ L 60, 2.3.2013, p. 1)

Regulation (EU) No 168/2013 of the European Parliament and of the Council of 15 January 2013 on the approval and market surveillance of two- or three-wheel vehicles and quadricycles (OJ L 60, 2.3.2013, p. 52)..

260 224 of 546 Stakeholders.

261 105 of 546 stakeholders.

262 35 mentioned challenges related to the insufficient harmonisation of motorcycle licences and minimum age requirements for motorcycle driving licences. Furthermore, some citizens mentioned the problem related to weight-allowance of certain vehicles (campers, O1 trailers), which has resulted in financial and administrative burdens for both citizens and public authorities. Another coherence problem related to the type approval legislation is the fact that the directive does not entirely correspond to three wheeled vehicles categories in the type approval legislation.

263 ACEM written contribution

According to the feedback of ACEM, new categories of vehicles introduced by the new type-approval regulation should be aligned with the driving licence directive. A new EU-type approval system for L-category vehicles (2-, 3- and 4-wheel vehicles such as motorcycles, mopeds, quads, and minicars) came into force at the end of 2015, when the EU repealed and replaced the old directive 2002/24/EC by Regulation (EU) No 168/2013. The updated rules include changes to the classification of the various vehicle categories. Against this background, there is an urgent need to re-align the two instruments.

Based on the existing literature, the directive currently does not allow the towing of trailers by category A vehicles, although this is possible under the type approval legislation. Additionally, there is a new requirement for certain electrically assisted pedal cycles (EAPC) to obtain type approval but this does not require additional requirements in terms of licensing.

Stakeholders[264] also signalled during the interviews that the type-approval legislation for heavier recreational vans is not entirely in line with Directive 2006/126/EC because category B driving licences do not allow the holders to drive these vehicles without applying for another type of licence.

Further to that, the Department for transport in the UK indicated in their report[265] that there is a new requirement for certain electrically assisted pedal cycles to obtain type approval.

During the interviews, it was also indicated that there might be a need for alignment with the type approval legislation in case of the new light electric vehicles[266].

Also, in the interview two Members States said that there is a lack of an EU-wide standard for driving licences for agricultural vehicles[267].

5.4.6 Impacts of observed inconsistencies / gaps / overlaps

EQ 19 "What are the impacts of the observed internal/external inconsistencies/ gaps/overlaps on the effectiveness

The evidence on the possible impact of inconsistencies is limited and some conclusions can only be drawn tentatively. The possible impacts identified were distortion of the internal market and hindered free movement caused by different minimum age requirements of professional drivers (in the meantime clarified by the new Directive (EU) 2018/645, amending Directive 2003/59/EC and Directive 2006/126/EC), difficulties in the recognition of third country professional drivers qualifications, difficulties in punishing cross-border traffic offences due to the absence of the mutual recognition of driving disqualifications, lack of operability of the

[264] DK and the IFMC.

[265] Department for Transport (2017), Implementing EU Regulation 168/2013 on type approval of Motorcycles, tricycles and quadricycles. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/632874/motorcycles-consultations.pdf

[266] Interview with NL.

[267] BE and NL.

provision on normal residence, non-promotion of environmentally-friendly vehicles, and a lack of social and technological progress in this area.

A few examples of impacts were given by respondents in the *survey with non-governmental stakeholders* when assessing the consistency/ gaps/ overlaps with other legislation. For instance, third country professional drivers encounter difficulties when their professional driver qualifications are not recognised due to the inconsistencies between the driving licence directive and Directive 2003/59/EC. Additionally, professional drivers must wait until a certain age to acquire their driving licences which represents a barrier to access the profession.

During the interviews, a few additional problems and their impacts were raised by individual stakeholders[268]:

- absence of mutual recognition of driving disqualifications may have an adverse effect on road safety;
- clarity issues related to normal residence may impede the general objective of free movement of EU citizens;
- the directive does not promote the use of environmentally-friendly vehicles and the social and technological progress in this area.

[268] BE, DE, DK, FIA and the IFMC.

5.5 EU Added Value

This subsection assesses the added value delivered by or associated with the implementation of the directive, over and above what reasonably could have been expected from national and regional policies and their implementation.

Relevant questions to assess this objective

EQ 20 What are the benefits of intervening at EU level, over and above what could have been reasonably expected from Member States acting individually at regional, national or international level (notably through the UNECE structure)?

EQ 21 How much actual value has been created, and what evidence is there in terms of order of magnitude of this added value?

EQ 22 Would it have been possible to have the same results without the directive

5.5.1 Benefits of intervening at EU level compared to acting at regional, national or international level

The analysis indicates that the main benefit of intervening at EU level, compared to what could have been achieved through bilateral and international cooperation, was increased harmonisation of driving licence rules and requirements. This had positive implications on road safety, freedom of movement of EU citizens, reduction in fraud and driving licence tourism, and reduced administrative burden for drivers and national authorities. Those effects would probably not have been as pronounced if they had been based solely on national legislation.

The implementation study [269] indicated that the directive has successfully harmonised rules on driving licences across the EU Member States, facilitated greater freedom of movement, reduced the possibility of driving licence fraud, and has generally improved road safety. The introduction of a single model of driving licence, the uniform approach towards driving licence categories, the mutual recognition of driving licences and harmonisation of administrative validity periods, have improved free movement of citizens and facilitated the reduction of fraud and driving licence tourism. RESPER contributed to reducing the administrative burden of driving licence authorities, driving licence fraud, and driving licence tourism.

This was confirmed by almost all interviewees (17 out 18), who indicated that there has been an added value of the directive.[270] The respondents in the survey of non-governmental stakeholders mostly agreed that the directive has had positive results in terms of free movement

[269] European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Report drafted by Hasselt University, NTUA.

[270] National authorities: BE, BU, DE, ES, FI, GR, NL and SI. Non-governmental stakeholders: STR, FEMA, FIA, IFMC, IRU, ACEM, CIECA, BVF and ETF.

(34 out of 36)[271] and road safety (30 out of 36)[272], which could not have been achieved at national or local level (for more details please read also section 5.1.1.2 on "Free Movement and Annex 2 on the "Stakeholder Consultation"). Moreover, the statistical analysis provides a quantification of the level of added value of EU intervention through the directive. Compared to the baseline of no EU intervention – thus a scenario comprising only national legislation and regional agreements – the data indicates a possible reduction up to 7% in road accident fatalities due to EU-level intervention.[273]

The objective related to road safety has been supported especially by the provisions on minimum requirements for examiners and medical checks for professional drivers. As regards the progressive access to higher motorcycle categories, though there is less evidence of road safety benefits of such system, it still seems to be perceived as beneficial. National authorities[274] highlighted certain benefits related to the system of progressive access to category A licences, particularly when it comes to road safety, due to increased focus on training and examination through the staged approach. One authority[275] nevertheless said that there is no evidence that the progressive access system contributed to better education, training curricula or road safety.

Two interviewees acknowledged the added value of the provision on standardised examination requirements when it comes to road safety.[276] One of the respondents indicated that the directive has established a better trust among the Member States[277].

As compared to other international frameworks (UN Conventions on Road Traffic) there is data to point to a higher level of added value for road safety emerging from the directive, due to the stricter rules and increased harmonisation.

5.5.2 Added value created by the directive and results that could have been achieved without it

The analysis indicates the EU value added of the directive. The quantitative assessment points to an annual reduction of 1.66% of road fatalities between 1983 and 1996 as compared to non-Member States which did not implement the directive, and in which an annual increase of 0.26% in road fatalities was observed after 1983. Although it is difficult to isolate the impacts of the directive from other factors, the views of national authorities, both in the survey and interviews, point to the value added created by the directive. Non-governmental stakeholders mostly agreed that the directive has achieved positive results in terms of free movement.

[271] 5 automotive and motorcycle federations, 1 drivers association, 7 driving school associations, 10 road safety and road users' associations (or civil societies and their members), 1 vehicle manufacturer association, 10 'other category'.

[272] 4 automotive and motorcycle federations, 1 drivers association, 6 driving school associations, 10 road safety and road users' associations (or civil societies and their members), 1 vehicle manufacturer association and 8 'other category'.

[273] See more details in section 2.2.

[274] SI, FI, GR, BG and DE.

[275] NL.

[276] FI and CIECA.

[277] FI.

For analysis purposes after 1983 European countries were separated into two categories: those which implemented the first driving licence directive 80/1263/EEC of 1980 and those which were not members of the EEC at that time and did not implement that directive, instead acting individually at regional and national level. For the Member States with the driving licence directive in force, an annual reduction of 1.66% in fatality rates between 1983 and 1996 is observed. In non-Member States without the directive in force, an annual increase of 0.26% in fatality rates is observed after 1983.

During the *interviews*, 6 out of 7 national authorities and 7 out of 9 non-governmental stakeholders indicated that it would have been difficult to achieve the same results[278], without the directive.[279] The interviewees mentioned several examples that would have prevailed in the absence of the directive, e.g. the administrative burden and the costs would have been higher, the harmonisation would have been limited, and the cooperation between the EU Member States would have been slower and more complex.

In the *survey with non-governmental stakeholders*, most agreed that the directive has achieved positive results in terms of free movement (34 out of 36)[280] and road safety (30 out of 36)[281] which could not have been achieved to the same extent at national or local level. Similar conclusions were obtained also as regards a reduction in the administrative burden for citizens and national authorities and as regards the combat against driving licence fraud and driving licence tourism, which 24 out of 36 respondents found was better achieved through the directive than it would have been through action solely at national or local level.

Regarding the administrative burden and cost for EU citizens and driving licence authorities, there is more doubt as to whether the directive led to positive results which would have not been possible without the directive. For both categories (EU citizens and authorities), 8 respondents disagreed, however the majority (16) still indicated that the burden and cost for citizens and driving licence authorities have been reduced due to the directive, and that this would have been possible with actions only at national and local level. Full details are available in Figure 2 in Annex 5.

In terms of facilitating free movement, *in the survey with non-governmental authorities*, a few examples were given of EU Value added. For example, it was indicated that the administrative procedures have been improved due to the EU single model driving licence, which is for instance relevant when travelling in Europe and being involved in a road accident. Other respondents mentioned that the directive has led to the elimination of international driving licence red tape, and made it easier for police to verify validity of driving licences. Two respondents stated that the directive contributed to reduced costs and administrative burden for citizens when they move abroad.

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[278] The harmonisation would have been limited (ES, BG, FI, GR, IRU, ACEM), the costs would have been higher (BU), the administrative burden for citizens and national authorities would have been bigger (BE, ES), the cooperation through international and bilateral fora would have been slower and much more complex (BE, FEMA, FIA) or completely impossible (SI), free movement would not have been facilitated (the NL, BG, GR) and the road safety level would have been lower (CIECA).

[279] National authorities: BE, NL, SI, FI, BG, ES; and non-governmental stakeholders: FEMA, IFMC, IRU, ACEM, CIECA, BVF, and FIA.

[280] 5 automotive and motorcycle federations, 1 drivers association, 7 driving school associations, 10 road safety and road users' associations (or civil societies and their members), 1 vehicle manufacturer association, 10 'other category'.

[281] 4 automotive and motorcycle federations, 1 drivers association, 6 driving school associations, 10 road safety and road users' associations (or civil societies and their members), 1 vehicle manufacturer association and 8 'other category'.

In the open public consultation, the respondents mostly considered the benefits to be in the area of freedom of movement for drivers (almost 70% of the respondents reported that the improvements were achieved to a great or somewhat extent), road safety for citizens (around 60% of respondents indicated a great or somewhat extent), and the fight against driving licence fraud (almost 50% of replies indicated a great or somewhat extent).

Furthermore, the majority of respondents indicated that the directive brought less benefits when it comes to the equal treatment of non-professional drivers. 50% of the stakeholders reported that improvements have been made in this area to a very little extent or not at all, as compared to what could have been reasonably expected from Member States acting individually at national level, whereas less than 30% of replies considered that the directive has had an important role in this area.

5.5.3 Would it have been possible to have the same results without the directive?

The analysis assumes, based on available information, that in the absence of the directive, Member States would probably have established more bilateral agreements with other countries or groups of countries, and that those agreements would have likely not reached such a comprehensive harmonisation of driving licence rules and requirements as is currently established by the directive. At the same time, Member States would likely have continued to rely on existing international mechanisms (i.e. through UNECE structures).

When comparing the achievements of the directive with the potential accomplishments that could have been achieved at regional, national, and international level in the absence of the EU directive, the key added value of the directive relates to increased harmonisation in terms of road safety and free movement. This has been described in a more detailed manner in the baseline analysis (see section 2.2), and under the effectiveness evaluation (see section 5) the introduction of minimum standards and harmonised driving licence rules and requirements at EU level has brought about benefits that would otherwise likely not have been achieved to the same extent.

In the absence of the directive, the majority of the Member States would have likely relied on the United Nations road safety mechanisms. Considering the scope of these instruments, one can reasonably conclude that the achievements in terms of free movement of citizens would not have been better facilitated at international level. As regards the international cooperation through the existing structures within the United Nations systems, the achievements can be better compared in terms of road safety trends rather than facilitation of free movement of citizens. Namely, the United Nations legal instruments on road safety are different in scope; their aim is not to facilitate free movement of citizens but rather to facilitate the recognition of driving licences when driving in a foreign country for a shorter period. Those conventions facilitate the free movement of drivers in short term visits to certain countries, but they do not have mechanisms similar to the directive in the case of a permanent change of country of residence. The directive establishes rules to facilitate the process for the exchange,

replacement, and renewal of driving licences for driving licence holders that transfer their normal residence, while the United Nations legal instruments don't have such mechanisms.

When comparing the achievements in terms of road safety between the EU/EEA region and other UNECE sub regions[282], the analysis indicates, based on the road fatality figures, that there is a higher level of added value for road safety emerging from the directive due to the stricter rules and increased harmonisation.

According to the literature review[283], the total number of fatalities in road traffic accidents decreased between 2007 and 2017 by almost 30% in the UNECE region.[284] The same source emphasises an even more substantial decrease for the UNECE sub-region comprising the EU Member States and EEA countries. Among the UNECE sub-regions, a relatively low decrease was observed in North America (11%). When drawing a comparison between the UNECE region and the EU/EEA sub-region, which is governed by a stricter road safety framework under the directive, it can be concluded that the road safety trends in the EU/EEA sub-region are improving at a faster rate than globally and in the overall UNECE region. This development could be an indication of the impact of the directive, but it is necessary to interpret this conclusion carefully, as road traffic developments depend on many different factors, one of the most prominent ones being the development level of a country. On the other hand, a comparison between the two UNECE sub-regions with mostly high-income countries, namely the EU/EEA sub-region and North America, shows that the road safety trends based on the road fatalities indicator are substantially better in the EU/EEA sub-region.

The EU added value is also evidenced by the results of the statistical analysis which clearly show that the directive has led to improved road safety in the Member States. The trends have been improving faster in the Member States than in the non-Member States which did not implement the directive.

Another key benefit of the directive as compared to what could have been achieved through bilateral and international cooperation is increased harmonisation. This was confirmed by 5 interviewed national authorities[285], and 5 non-governmental stakeholders.[286] This was specially the case with:

- The introduction of a single driving licence model (before the directive there were more than 110 different driving licence models with different entitlements and validity periods in Europe. The directive simplified this patchwork, reducing the administrative burden, and facilitating driver mobility.

[282] The UNECE region is governed by a set of international instruments which have some objectives which are similar to those in the driving licence directive.

[283] UNECE (2020), A foundational Safety System concept to make roads safer in the Decade 2021-2030. https://unece.org/DAM/road_Safety/Documents/4th_UN_Partnership_meeting_4_Nov_20/BN_UNECE_publication_road_safety_plan.pdf

[284] The ECE region covers the 56 countries that are UNECE Member States, including the countries of Europe, but also countries in North America (Canada and United States), Central Asia (Kazakhstan, Kyrgyzstan, Tajikistan, Turkmenistan and Uzbekistan) and Western Asia (Israel).

[285] BE, DE,ES, GR and NL.

[286] FEMA, FIA, IFMC, IRU, ETF.

- The introduction of a uniform approach towards driving licence categories and validity periods: this has improved free movement of citizens and facilitated the reduction of fraud and 'driving licence tourism'.
- Establishment of a pan-European network for the exchange information on driving licences (RESPER): The establishment of RESPER has made an important contribution to reducing the administrative burden of driving licence authorities and to reducing driving licence fraud and 'driving licence tourism'.Establishment of minimum requirements for examiners.
- Establishment of medical check-ups for professional drivers.
- Introduction of graduated access to motorcycle driving licences.

6. CONCLUSIONS

The evaluation has assessed the effectiveness, the efficiency, relevance, coherence and the EU added value of Directive 2006/126/EC on driving licences. Based on the analysis in the previous sections the following conclusions are drawn, while recalling the limitations detailed in section 4.

Effectiveness

Road Safety

The analysis, as mentioned in section 4.2, faced limitations in terms of data availability, since there is no obligation of reporting applicable to the Member States under the directive. In that context, unlike other policy areas subject to an obligation of reporting, there is no comprehensive initial set of data available for the analysis. While other factors have also influenced road safety (e.g. improved infrastructure, education, vehicle technology, reduced dangerous behaviour), the analysis provides some statistical evidence, with the respective caveats, that the effect of the directive has been positive when it comes to road safety. Although the analysis is based on incomplete data, it is confirmed by stakeholders' opinions to some extent.

Certain new provisions of the directive are found by stakeholders to be particularly important in contributing to enhanced road safety, including minimum standards for driving examiners, medical examination for professional drivers, and tests for drivers of mopeds and motorcycles.

While progress was likely made in terms of improving road safety, in light of the ambitious EU targets (Vision Zero and Valletta Declaration), more efforts are however needed to reduce road fatalities and accidents. The evaluation concludes that the directive could be an important tool that can contribute to this.

Harmonisation of the driving licence rules

A higher level of harmonisation of the driving licence rules across EU Member States seems to have been brought by the three driving licence directives of 1980, 1991 and 2006, and is likely to have been beneficial to the objectives on road safety and free movement. Nevertheless, some differences still remain when it comes to administrative validity periods, in particular the application of exemptions for certain categories of drivers (novice drivers and older drivers), the requirements for issuance of driving licences upon expiry of administrative validity periods, the requirements for medical checks and for periodicity of medical examinations of non-professional drivers (categories A and B), the practices and requirements on training and testing (e.g. formal, informal, or combination training, hazard perception risk / self-assessment, risk awareness, self-awareness requirements), the requirements for drivers' examiners, and the recognition of driving licences issued by third countries.

Skills and knowledge

Training requirements vary considerably across Member States, while the standards on skills and knowledge of drivers are established by the directive. There is limited information concerning the extent to which the skills of professional and non-professional drivers may have improved and the effect the directive may have had in this regard. The results of the consultation activities are inconclusive when it comes to the direct effect of the directive on raising driving skills. Stakeholder views vary regarding the need to harmonise training obligations. Some stakeholders indicate that the absence of a harmonised framework for training has implications on the skills of drivers and road safety, whereas other stakeholders point to the need to allow flexibility to Member States to accommodate their national specificities in defining training curricula. At the same time, the consulted stakeholders highlight the importance of elements such as risk awareness and self-awareness for novice drivers and low mileage drivers when it comes to important aspects for ensuring road safety.

In addition, the directive sets out minimum standards for driving examiners concerning quality assurance and regular periodic training measures. The evaluation finds that most[287] Member States perceived that both quality assurance and periodic training requirements are sufficient to guarantee quality of training and road safety, although some aspects could be improved (e.g. communication skills). Furthermore, Member States and non-governmental stakeholders consulted were of the view that the current provisions of the directive concerning drivers' examiners have had a positive effect on road safety.

Absence of an EU-wide framework for mutual recognition of driving disqualifications

The analysis further indicates that the absence of an EU-wide framework for mutual recognition of driving disqualifications poses challenges when it comes to preventing abuse by drivers that commit traffic offences in one Member State but can then drive in another Member State without bearing consequences for their offences. This issue was also raised in the proceedings of the European Court of Justice.

RESPER

RESPER is considered an effective tool for the exchange of information between national authorities. The advantages of RESPER include: fast exchange of driving licence information; access to relevant information on validity of driving licences; possibility to prevent driving licence fraud and accelerate the procedures related to exchange and renewal of driving licences; and facilitation of the implementation of the principle of mutual recognition of driving licences. The disadvantages relate both to the system's quality - query errors, incomplete information, as well as limited uses. RESPER is not being utilised when it comes to exchange of driving information for enforcement purposes, exchange of information on demerit points, exchange of information on national codes, and normal residence.

Facilitation of free movement

Another key objective of the directive is the facilitation of the free movement of citizens inside the EU. The provisions that have likely been particularly impactful in this regard include the Community Model driving licence, the principle of mutual recognition of licences issued in Member States, and minimum age categories.

In contrast, other provisions presumably still result in administrative burden or obstacles to the free movement of people. This is the case of the provision on normal residence, which has

[287] Desk research reveals that Member States considered that the current level of requirements for both quality assurance and periodic training are sufficient (19 out of 20 Member States).

unexpected negative effects, given that the 185 days rule is difficult to apply and there is no clear definition for interpreting the existence of personal ties.

While there is limited information concerning the impact of differences in recognition of driving licences issued in third countries, stakeholders have indicated that the lack of a harmonised approach to recognising driving licences issued in third countries poses challenges. These include an increased administrative burden for authorities, driving licence shopping, and increased barriers for third country nationals, including professional drivers.

Reduction of fraud and 'driving licence tourism'

Reduction of fraud and 'driving licence tourism' has been another key objective of the directive. Although precise data on driving licence fraud and 'driving licence tourism' is not consistently available, roughly half of the stakeholders consulted perceive that the provisions of the directive particularly RESPER, the Union model, and anti-fraud measures, have contributed to reducing fraud and 'driving licence tourism'.

Efficiency

The existing evidence does not allow quantification of the extent to which the directive may have led to excessive costs or administrative burden for citizens, authorities and firms. On the one hand, the provisions on the Community Model driving licence and RESPER do not appear to have led to additional costs for citizens and are also found to have likely contributed to a reduction in administrative burden. On the other hand, harmonised validity periods and the requirement to renew driving licences periodically, as well as the requirement to have regular medical checks for professional drivers, are found to have likely increased administrative burden and costs for citizens. Progressive access to category A system is also possibly associated with increased costs and burden on applicants.

Significant differences are found in the driving licence fees incurred in Member States. The main causes for variation in costs are related to national requirements and the level of efficiency and organisational specificities of national administrations. Similar differences are found in the training costs incurred in the Member States. These may be explained by differences in training requirements in terms of the number of lessons (theoretical and practical), requirements for specialised training (e.g. cost of first aid course), and the national and regional specificities in terms of the market for the provision of driving licence training.

Several areas with potential for simplification and reduction of administrative burden are identified. These relate to: digital licence renewal and medical checks for professional drivers; progressive access to category A licences; rules related to weight limits for category B licences; and processes related to normal residence. Digital solutions and digitalisation of driving licences are insufficiently explored at present, and the use of RESPER could offer further potential for reduction in the administrative burden.

Relevance

The technological context for driving licences has evolved over the past years due to digitalisation, new technological solutions, and increased awareness about the environmental impact of the transport sector. The evaluation finds that the current provisions of the directive on driving skills and knowledge do not sufficiently reflect the new technological solutions,

such as semi-automated and automated driving, vehicles with automatic transmission, advanced driver-assistance and efficiency increase systems, and alternative fuel vehicles. Furthermore, digital transformation provides an opportunity to further improve document security based on digital counter-falsification measures and requires the mutual recognition of driving licences to be extended to digital driving licences.

New transport modes, offering new solutions of micro-mobility such as electric scooters, bikes and mopeds, have increased in popularity among road users. However, currently Member States have different approaches to regulating such new forms micro-mobility. Some consulted stakeholders have raised concerns related to the absence of a common EU framework for regulating new micro-mobility solutions, in particular when it comes to road safety. Others, however, doubt the need for an EU initiative on micro-mobility.

The evaluation finds that there may be a need to maintain a balance between road safety and the mobility needs of young drivers. The current minimum age limits established by the directive are found to be broadly adequate. However, there is substantive variation in minimum age limits amongst countries, in particular as regards licences for mopeds. The consultation also pointed to the fact that stakeholders representing the motorcycling community consider the system of progressive access and requirements thereof to be too demanding for young people. Some Member States have explored the potential to lower the minimum age limit for accompanied driving for non-professional drivers and professional drivers. Regarding age limits for professional drivers, there is no unanimous view amongst stakeholders as to the appropriate age limits. While trade union representatives broadly indicate that there is no need to lower the minimum age and efforts should focus on the attractiveness of the sector, industry representatives point to the need to lower the age requirements to address the problem of driver shortages in Europe.

The analysis points to the fact that a balance may also need to be achieved between road safety and the mobility needs of ageing drivers. Member States have taken different approaches in terms of regulating the mobility of older drivers with several Member States implementing special requirements for older drivers (e.g. increased medical checks, shorter validity periods upon renewal). There is no conclusive evidence that fitness screening based on age provide significant safety benefits[288] but the consultation indicates that more attention should be paid to high health risk drivers and the consultation indicates that more attention should be paid to high health risk drivers. Another conclusion of the evaluation is that the increased mobility of citizens within the EU is causing difficulties in obtaining a driving licence in instances of insufficient command of the official language of the country of residence.

Coherence

The evaluation found no major internal inconsistencies between the directive's provisions. However, a key area where further precision may be needed relates to the provisions on normal residence, which pose challenges signalled by national authorities. Inconsistencies regarding equivalence rules were also raised, and the level of precision of Annex III on standards on alcohol and drugs and medicinal products was regarded as being insufficient.

In terms of coherence with international legislation, the evaluation did not find major inconsistencies between the directive and the international conventions with similar objectives (1949 Geneva Convention on Road Traffic and the 1968 Vienna Convention on Road Traffic).

[288] Study on driver training, testing and medical fitness (2017)

In terms of coherence with EU road safety and transport legislation, the evaluation finds overall coherence with overarching EU policies (e.g. Vision Zero, Valletta Declaration) and EU legislation. The directive is found to be complementary to the Cross-Border Enforcement directive 2015/645, but synergies seem to be insufficiently explored concerning the enforcement of mutual recognition of driving disqualifications between countries. In terms of coherence with other EU legislation, the evaluation does not point out to major gaps or inconsistencies. However, the directive is not sufficiently aligned with the type approval legislation in particular Regulation (EU) No 168/2013 (L-category type approval framework, and the possibility to tow trailers with category A vehicles).

EU added value

The evaluation concludes that the main benefit of the directive as compared to what could have been achieved in bilateral and international cooperation is related to the increased harmonisation of driving licence rules across Member States. The analysis indicates that the directive has had a positive effect on road safety, the free movement of EU citizens, the reduction in driving licence fraud and driving licence tourism, as well as reduction in administrative burden. However, some challenges remain regarding some provisions. The same level of achievement would probably not have occurred in the absence of the directive, as cooperation would have likely continued via bilateral agreements between countries which, in turn, would have also probably implied a higher complexity of the licensing system and a greater administrative burden.

- **ANNEXES**

- Annex 1: Procedural information
- Annex 2: Summary of public and stakeholder consultation
- Annex 3: Methodology
- Annex 4: Intervention logic
- Annex 5: Tables and graphs
- Annex 6: REFIT costs and benefits

Annex 1: Procedural information

1. LEAD DG, DECIDE PLANNING

• The lead Directorate-General is DG MOVE.

• The evaluation was validated in Decide under reference PLAN/2019/5793

2. ORGANISATION AND TIMING

• The evaluation roadmap was published on 13 August 2019.

• The evaluation was launched on 24 October 2019 with the first meeting of the Interservice Steering Group, consisting of the following Commission Services and Agencies: GROW, EMPL MOVE, SG, SJ and RTD. The group discussed the outline of the evaluation, including the evaluation roadmap and the drafts of the intervention logic, evaluation questions, consultation strategy and the terms of reference for an external study to support the evaluation.

• The Commission contracted an external consultant to carry out the study to support the evaluation. This work started in March 2020 and was concluded on 30 March 2021. The kick-off meeting for the support study was held on 20 March 2020.

• The Interservice Steering Group discussed the inception report for the support study on 20 March 2019.

• On 16 October 2020, a stakeholder workshop was held to present preliminary results of the evaluation and to consult with the more than 66 participants from the road safety sector. The results from the workshop were reflected in the evaluation and the support study.

• The second interim report[289] for the support study was submitted to the Interservice Steering Group on 03 December 2020 and approved on 11 December 2020.

• The Commission conducted a public consultation on the evaluation from 28 October 2020 to 20 January 2021.

• The Interservice Steering Group discussed the draft final report for the support study on 19 February 2021. All final deliverables of the support study, including the final report, the executive summary, all technical annexes and the stakeholder consultation report were approved on 22 June 2021.

. EVIDENCE, SOURCES AND QUALITY

• The evaluation relies mostly on the support study in the ex post evaluation[290]conducted by an external contractor.

• This study will be publicly available.

[289] Which included the results of the first interim report.

[290] Support Study to the ex-post evaluation of Directive 2006/126/EC on Driving Licences (Specific Contract MOVE/C2/2019-534/SI2.826438 under framework contract MOVE/A3/2017-257) - ISBN: 978-92-76-37815-0

Annex 2: Stakeholder consultation

INTRODUCTION

The Commission coordinated various consultation activities between 13 August 2019 and 20 January 2021 in the context of the *ex-post* evaluation of the directive.

The Commission conducted one consultation on the roadmap of the initiative, and one open public consultation[291]. Exchanges were also held during meetings of expert groups and Committees chaired by the Commission.

The Commission also contracted an external study in support of the evaluation. The study included targeted questionnaires and interviews as well as a workshop — all conducted by the contractor[292]. Their results are also included in this report.

CONSULTATION METHODS

In order to ensure that all affected and interested stakeholders are represented during the stakeholder consultation, the approach for consulting stakeholders and citizens has been presented in the roadmap of the initiative.

The roadmap was published on 13 August 2019, and was then open for feedback until 10 September 2019.

Targeted surveys were conducted with national authorities and non-governmental stakeholders between 31 August and 11 December 2020.

Structured interviews with national authorities and non-governmental stakeholders were also conducted between 4 May and 24 August 2020.

A stakeholder workshop was conducted on 16 October 2020 for the purpose of gathering evidence, confirming identified findings, seeking feedback on emerging findings, and collecting views.

Finally, an open public consultation was also held between 28 October 2020 and 20 January 2021, allowing the interested public and stakeholders to express their views on the current rules.

TARGETED CONSULTATION

The targeted consultation involved surveys and interviews conducted on a number of selected stakeholders, as opposed to the public consultation and the roadmap, which were open to the public.

[291] The details of the consultations can be consulted at https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/11930-Driving-licence-rules-evaluation_en

[292] "Support study to the ex-post evaluation of Directive 2006/126/EC on driving licences" by COWI commissioned by the European Commission

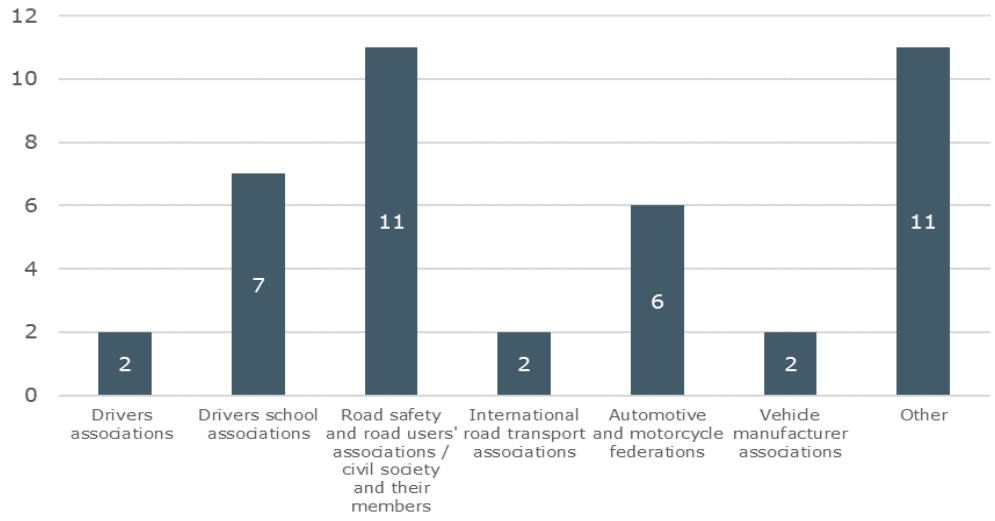
SURVEYS

Targeted surveys with national authorities and non-governmental stakeholders were held from 31 August until 11 December 2020.

The questionnaire for national authorities was answered by national authorities (ministries, national transport authorities) covering 26 Member States(Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia , Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden). In two cases (i.e. Luxembourg and Bulgaria), 2 different national authorities from the same country provided answers to the questionnaire. Furthermore, national authorities from covering 2 EEA countries (Iceland and, Norway) and Switzerland also provided responses to the questionnaire: The results of the survey are comprehensive in the sense that they cover all Member States. The majority of the questions addressed to the national authorities concerned the collection of objective information related to the policy options made by the directive and the level of implementation of its provisions.

The questionnaire for non-governmental stakeholders was answered by 41 participants covering various stakeholder categories e.g. road safety and road users' associations, driving school associations, drivers' associations, automotive and motorcycle federations, international road transport associations and vehicle manufacturer associations, as illustrated below.

Figure 1 – Distribution of non-governmental organisations having answered to the survey by type



Source: Survey with non-governmental organisations.

STRUCTURED INTERVIEWS

A series of interviews have been held with 9 national authorities (Belgium, Bulgaria, Denmark, Finland, Germany, Greece, Netherlands, Slovenia and Spain) and 13 non-governmental stakeholders (motorcycle and automotive industry, driving instructors, road safety organisations, driving schools, transport workers, motorcyclists, motor homes' owners, and road transport operators).

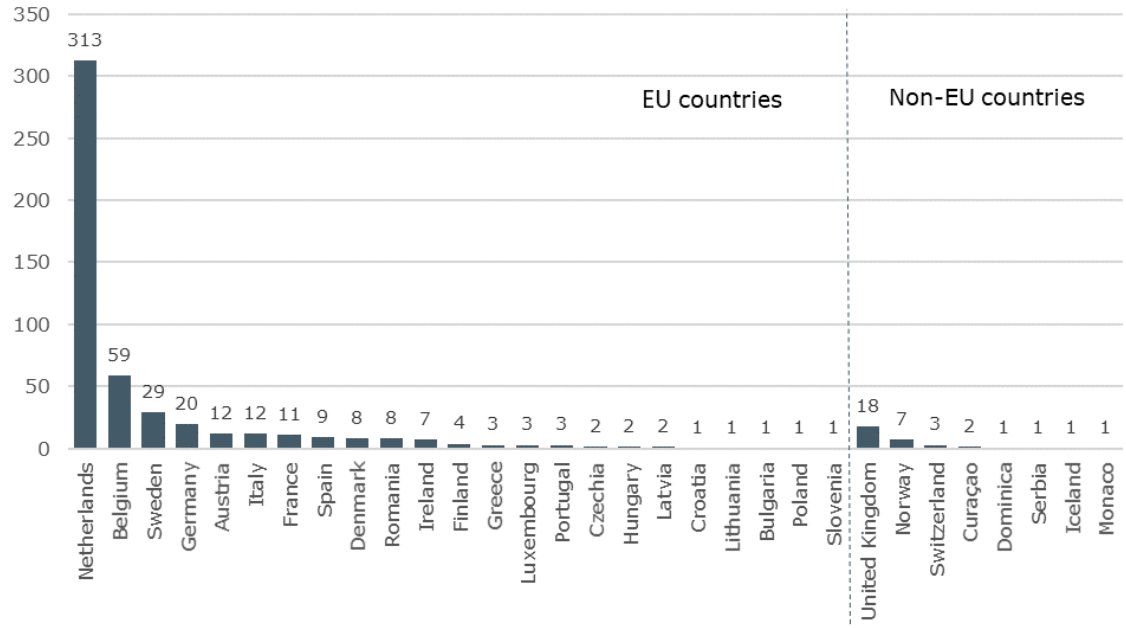
STAKEHOLDER WORKSHOP

A stakeholder workshop was conducted on 16 October 2020 with the purpose of gathering evidence, confirming issues found in the evaluation, collecting views on the performance and implementation of the directive, and seeking feedback on the emerging findings. The workshop was aimed at the validation and discussion of preliminary findings with the stakeholder community. Itwas attended by 66 participants including representatives from driving licence authorities, transport safety associations, road user associations, driving schools associations and driving schools, automotive and motorcycle federations, the consortium members of the support study and policy officers of the European Commission.

OPEN PUBLIC CONSULTATION

An open public consultation was also carried out, between 28 October 2020 and 20 January 2021, when a total of 546[293] respondents from 23 Member States and 8 other countries provided feedback. An absolute majority, i.e. 57% (313), of respondents originated from the Netherlands, followed by Belgium (10%), Sweden (5%), and Germany (3%). Eastern European countries were less represented. The high proportion of respondents from the Netherlands can be explained by a wide mobilisation to provide views concerning motorcyclist rules.

Figure 2 Distribution of respondents by country of origin (N= 546)



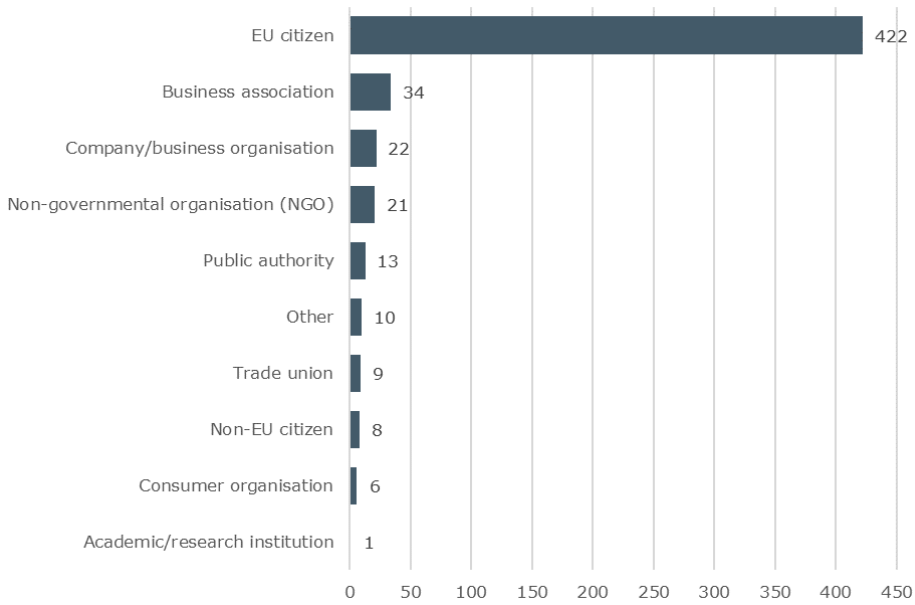
Source: Open Public Consultation, Question: Country of origin

The majority of respondents (77%, i.e. 422 respondents) answered as EU citizens. A high percentage of EU citizens originated from the Netherlands (71% of respondents that identified themselves as EU citizens). The remainder of the respondents represented a variety of stakeholder groups including business associations, companies / business, non-governmental

[293] 548 responses were received but 2 were excluded from *analysis* as they indicated that they were tests.

organisations, public authorities, trade unions, consumer organisations, non-EU citizens and academic institutions.

Figure 2 Distribution of respondents by type of stakeholder (N= 546)



Source: Open Public Consultation Survey, Question: I am giving my contribution as …

EVALUATION ROADMAP CONSULTATION

A consultation on the evaluation roadmap was held during the period 13 August 2019 to 10 September 2019. Comments were provided by 22 respondents. The consultation responses included: 10 business associations; 3 non-governmental organisation; 2 business organisations / businesses; 1 public authority; 3 consumer organisations; 1 other association (optometry and optics); and 2 EU citizens.

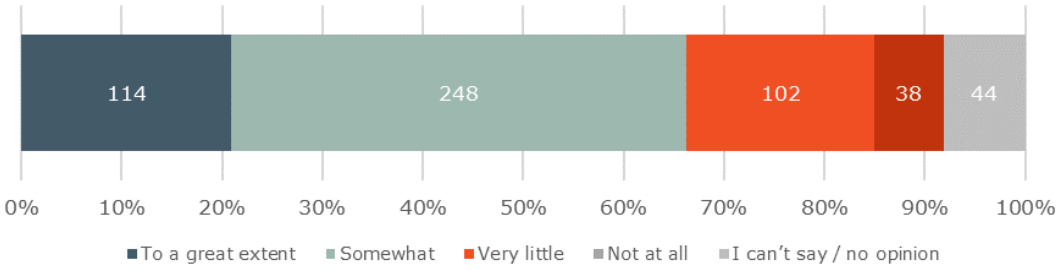
GENERAL AREAS OF INTEREST FOR NON-GOVERNMENTAL STAKEHOLDERS

Each of the major stakeholder groups addressed have certain areas of particular interest in the evaluation. Road safety and road users associations have a particular interest when it comes to the provisions of the directive and the extent to which they yield the best results in terms of road safety. Driving school associations have a specific interest in the provisions on training and testing of drivers. Drivers' associations have an interest in ensuring that the provisions of the directive do not impose unnecessary burden and provide for a smooth process of obtaining a licence and related procedures. International and road transport associations have a particular interest when it comes to road safety, as well as specific provisions of the directive such as provisions concerning professional drivers and provisions concerning motorcycle riders. Finally, automotive and motorcycle federations and vehicle manufacturer associations have a particular interest in ensuring that the provisions of the directive do not negatively affect technological advances in the industry.

Impact on Road Safety

Most of the respondents who could make an assessment in the survey of national authorities (11 out of 32), most non-governmental survey respondents (30 out of 41), national authority interviewees (9) and non-governmental stakeholder interviewees (7 out of 13) made a positive assessment of the contribution that the directive has had on road safety. Furthermore, open public consultation respondents (362 out of 546) generally assess the directive **as having had a positive effect on road safety.** Below we present some of the more detailed results.

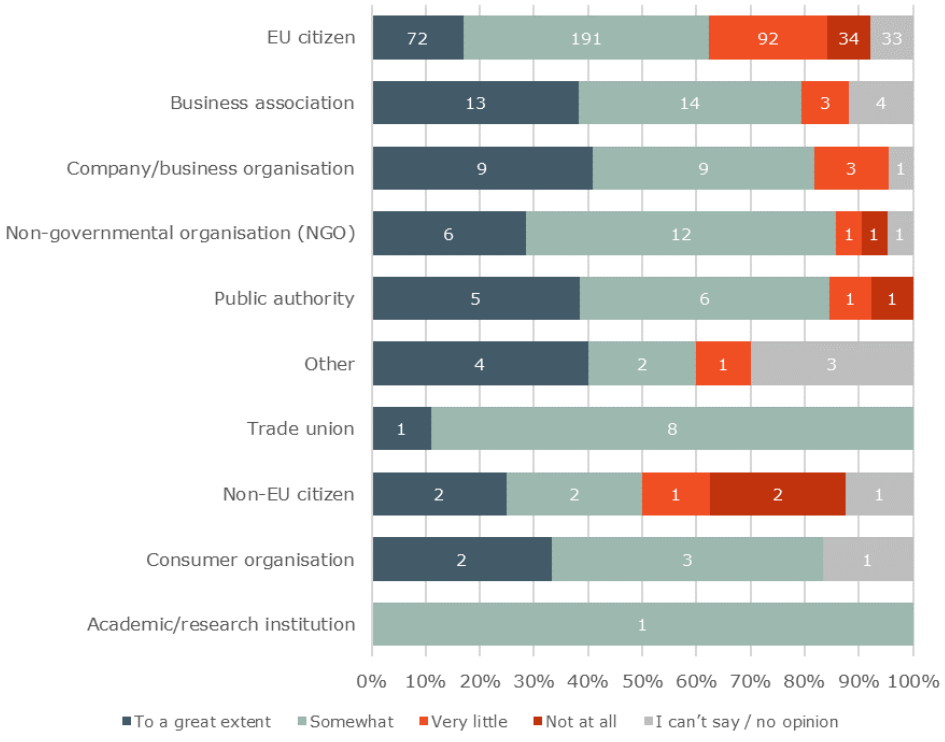
In your view, to what extent is ***the directive a relevant tool to reduce the number of road crashes in the EU?***



Source: Open Public Consultation Survey, Question 1.

When analysing the results by stakeholder group, it is notable that most of the stakeholders that considered the directive had not been a relevant tool to reduce road safety were represented by EU citizens (i.e. 90%, i.e. 126 of the 140 respondents that had either answered 'very little' or 'not at all' were EU citizens).

In your view, to what extent is the ***directive a relevant tool to reduce the number of road crashes in the EU?***

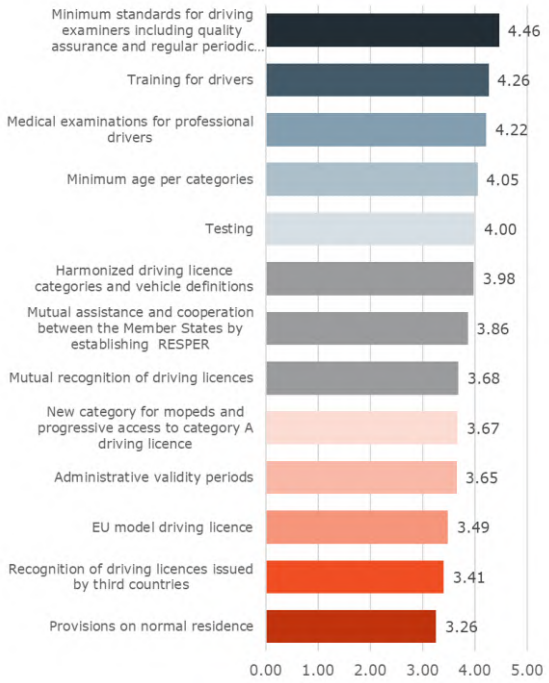


Source: Open Public Consultation Survey, Question 1.

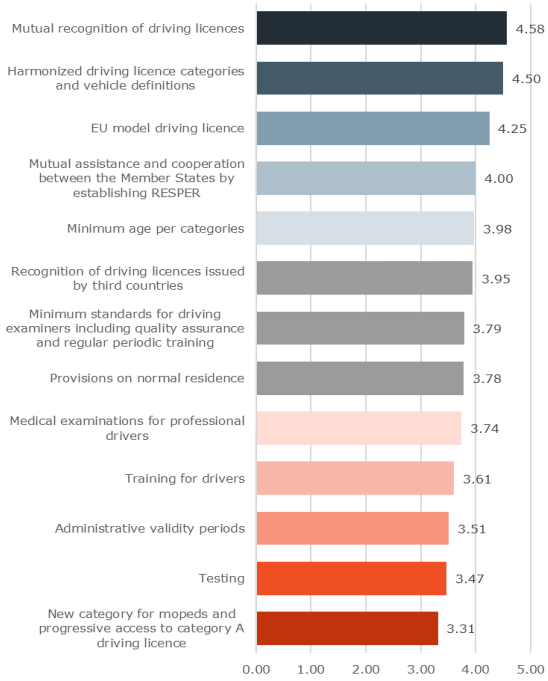
Particularly important provisions

Provisions that are considered to have been particularly important by stakeholders when it comes to road safety include minimum standards for driving examiners (including quality assurance and periodic training), medical examinations for professional drivers, and training for drivers. The positive impact on drivers is also echoed by driving school associations. In the targeted survey with non-governmental stakeholders the following opinions where expressed:

How important are the following provisions of the driving licence Directive 2006/126/EC in improving road safety



How important are the following provisions of the driving licence Directive 2006/126/EC in ensuring free movement of EU citizens?

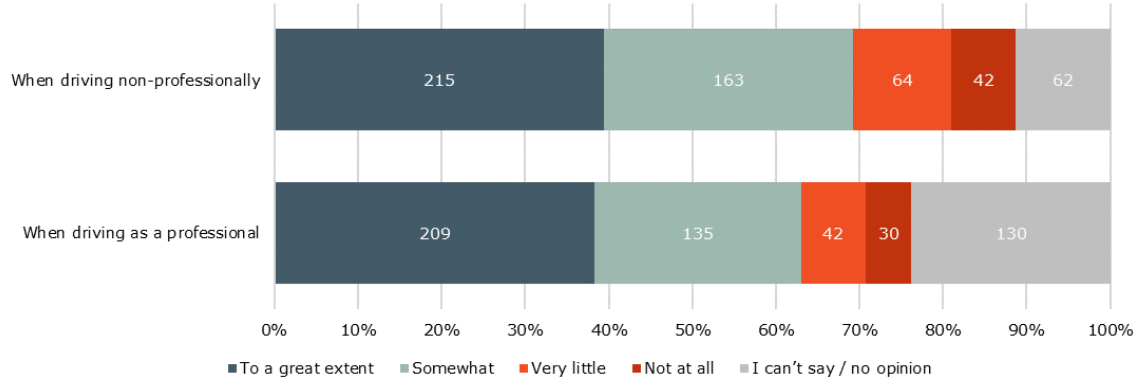


Source: targeted survey with non-governmental stakeholders

Free Movement

The stakeholders consulted (23 out of 32 respondents in the survey of national authorities, 9 national authorities interviewed, and 8 out of 13 non-governmental stakeholder interviews) indicate that the directive facilitated free movement of persons. The open public consultation also pointed to the fact that the directive has contributed to facilitating free movement of both professional (378 out of 546 respondents) and non-professional drivers (343 out of 564 respondents). Some of the more detailed results of the open public consultation are set out below:

To what extent do you think the directive is a relevant tool to facilitate the free movement of citizens when they drive across the EU, when driving non-professionally and when driving professionally?

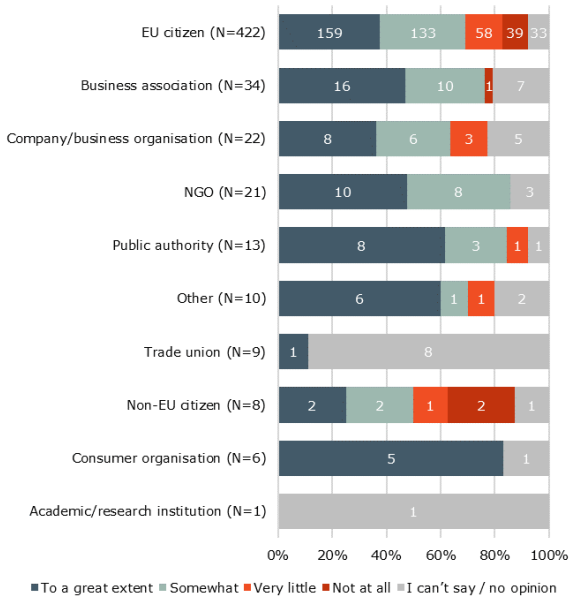


Source: Open Public Consultation Survey, Question 2.

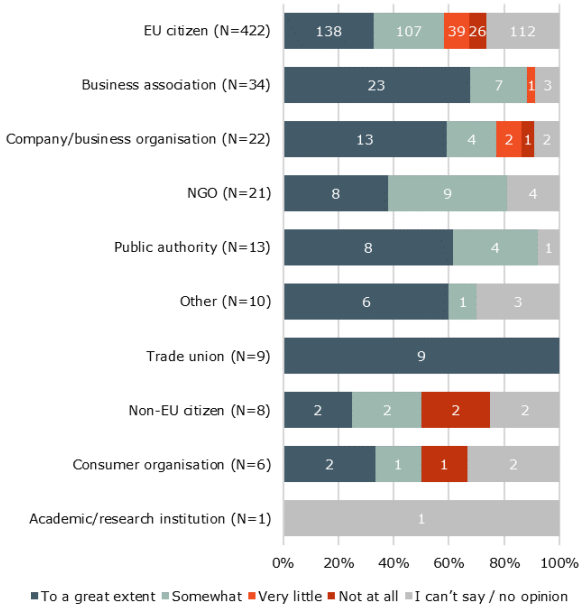
When looking at the distribution of responses by type of stakeholders, less positive assessments of the relevance of the directive as a tool to facilitate free movement of citizens came again from respondents that represented EU citizens as well as non-EU citizens (see figure below).

To what extent do you think the directive is a relevant tool to facilitate the free movement of citizens when they drive across the EU, when driving non-professionally and when driving professionally?

When driving non-professionally



When driving professionally



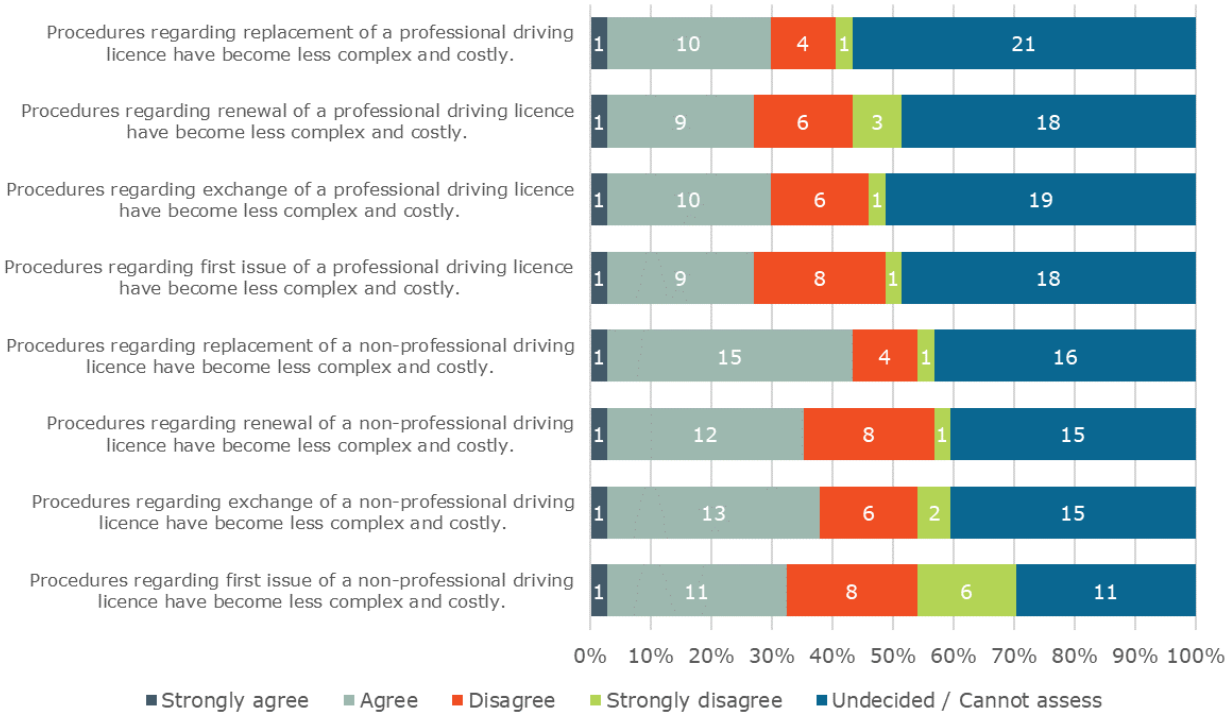
However it is generally recognised that certain provisions of the driving licence directive negatively affect the free movement of drivers, particularly the rules on normal residence.

CONSULTATION RESULTS – ADMINISTRATIVE BURDEN ON CITIZENS

Consulted stakeholders presented mixed views when it comes to the new procedures introduced by the third driving licence directive.

On one hand, their views were either neutral on the effect - 14 out of 20 national authorities in the targeted survey said that the processing time had not changed after the directive - or broadly positive - in the range of 9 to 15 respondents (see graph bellow) in the targeted survey with non-governmental authorities assessed that the procedures for first issue, replacement, renewal or exchange have become less complex and costly.

To what extent do you agree with the following statements concerning the impacts of the directive for EU citizens since it was first time implemented (1983)? (N=37)

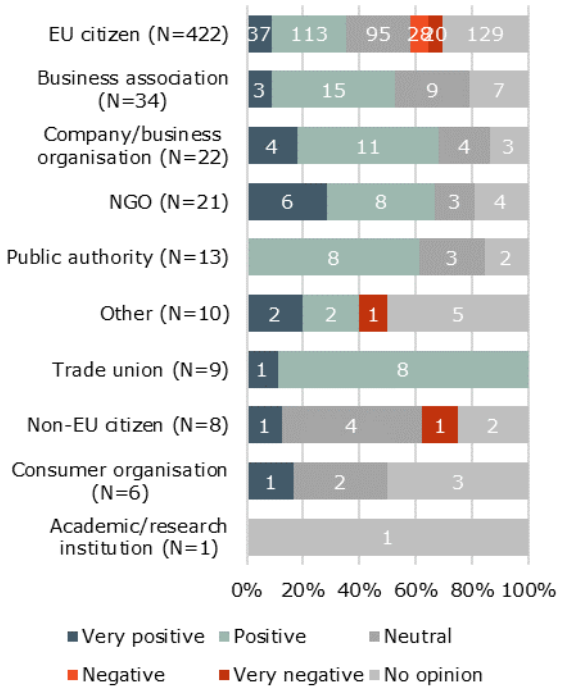


Source: Survey with non-governmental organisations.

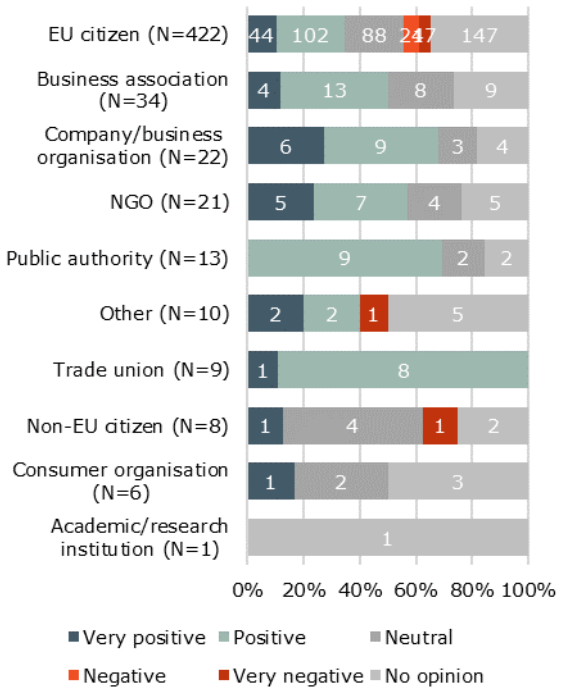
On the other hand, interviewed stakeholders (7 out of 9 interviewed national authorities, 9 out of 13 interviewed non-governmental stakeholders) as well as the open public consultation (196 out of 546 respondents) point to the fact that the administrative validity periods rules have led to higher administrative burden, particularly when it comes to professional drivers. However, some stakeholders (5 out of 13 interviewed national authorities) have also acknowledged that the benefits of the harmonisation outweigh the burden. In the open public consultation, the following questions were asked relating to the effect on administrative burden:

Impact of introducing a 5-years validity period on the driving licences of professional drivers?

For professional drivers with activities in other Member States



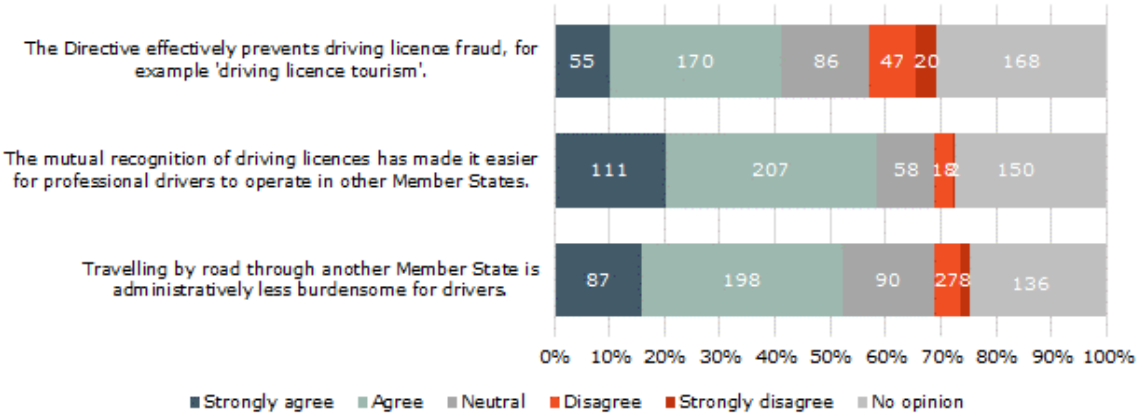
For professional drivers with only national activities



Source: Open Public Consultation Survey, Question 9.

In the comparison of the situation between 2000 and 2013 and the current one, respondents to the public consultation saw a positive improvement overall. Most of all, respondents agreed that it has become easier for professional drivers to operate in other Member States thanks to mutual recognition of driving licences. 58% of all respondents (i.e. 318) agreed or strongly agreed with this statement. Respondents also pointed to improvements as regards the decrease in administrative burden when travelling by road through another Member State. 52% of respondents either agreed or strongly agreed that travelling has become less burdensome. Furthermore, 41% agreed or strongly agreed that the directive is effective with regard to mutual recognition of driving licences and its impact on professional drivers, whereas 12% disagreed or strongly disagreed with this statement.

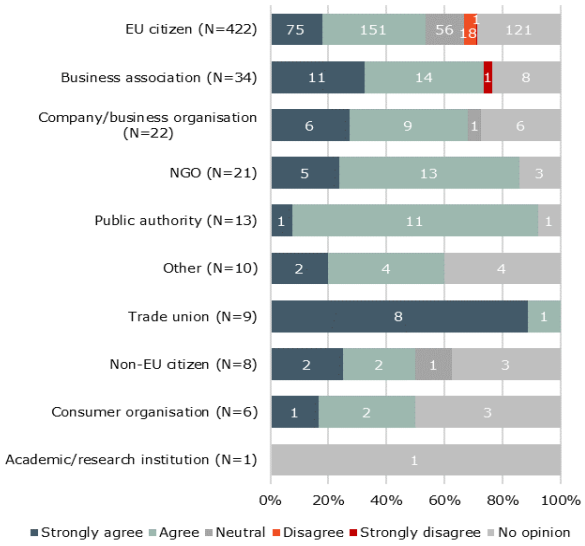
Comparing the current situation with the situation between 2000 and 2013, what is your opinion on the following statements?



Source: Open Public Consultation Survey, Question 10.

As regards the results across various stakeholder groups(has shown in the chart below), it can be observed that trade union representatives most strongly agreed that the mutual recognition of driving licences has made it easier for professional drivers to operate in other Member States. Furthermore, this stakeholder group almost uniformly disagreed with the statement that the directive has been successful in relation to driving licence fraud. As regards the latter, around 38% of public authorities shared the same view.

The mutual recognition of driving licences has made it easier for professional drivers to operate in other Member States.

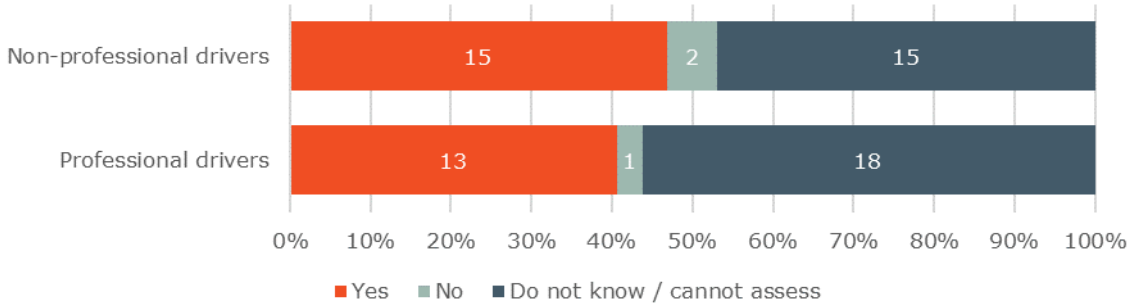


CONSULTATION RESULTS – EFFECTS OF THE DIRECTIVE ON DRIVING SKILLS

Concerning the skills of non-professional drivers, a significant proportion of national authorities consulted in the targeted survey (15 out of 32) provided a positive assessment on this matter, while the remainder did not make any assessment. Concerning the skills of

professional drivers, a substantive proportion of national authorities consulted in the survey (18 out of 32) could not make an assessment, whereas the remainder (13 out of 32) made a positive assessment.

Has the third driving licence directive contributed to improving driving skills of non-professional drivers and professional drivers?



Source: Survey with national authorities.

In the targeted survey with non-governmental organisations, just over a half of the 41 surveyed stakeholders perceived that the directive led to improved driving skills of professional and non-professional drivers

CONSULTATION RESULTS – EFFECT OF THE DIRECTIVE ON EXAMINERS' SKILLS

National authorities consider that the level competences related to knowledge and understanding of driving and assessment, assessment skills, personal driving skills and quality of services is sufficient (19 out of 20 Member States).

In addition, literature review indicates that national authorities generally perceive that the current provisions of the directive on driving examiners have had a positive effect on road safety (11 out of 20 Member States).

CONSULTATION RESULTS – EFFECT OF THE DIRECTIVE ON NOVICE DRIVERS

23 out of 32 respondents in the targeted survey of national authorities, and 9 national authorities interviewed, pointed out that the directive has contributed to improved road safety by reducing the number of road fatalities and serious injuries at national level for novice and young drivers.

Almost all the non-governmental stakeholders interviewed had the same view, except one which considers that the graduated access scheme applied to motorcycles is counterproductive because it reduces the number of young riders and therefore only delays the problem.

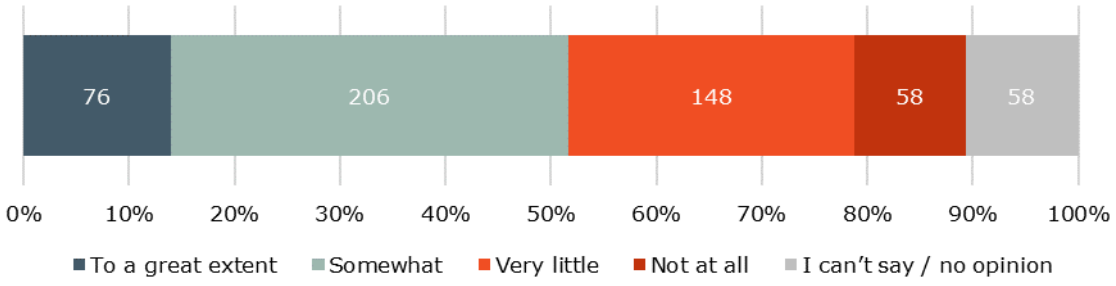
The majority of respondents to the open consultation (276 out of 546) strongly disagreed or disagreed that the graduated access system for motorcycle licences is important to ensure road safety, while only 184 either strongly agreed or agreed with the statement.

However, it should be underlined that a large proportion of these negative answers was from Dutch stakeholders (209 out of the 276). Those who are against graduated access system for motorcycle licences view it as too burdensome for novice drivers, while other stakeholders mainly licensing authorities, consider that graduated access has advantages allowing younger drivers to get familiar with less powerful bikes, before acceding the more powerful ones.

Adequacy of the directive in relation to new technologies and new vehicles:

In the open public consultation, opinions were split on the **adequacy of the directive in relation to new technologies and new vehicles:**

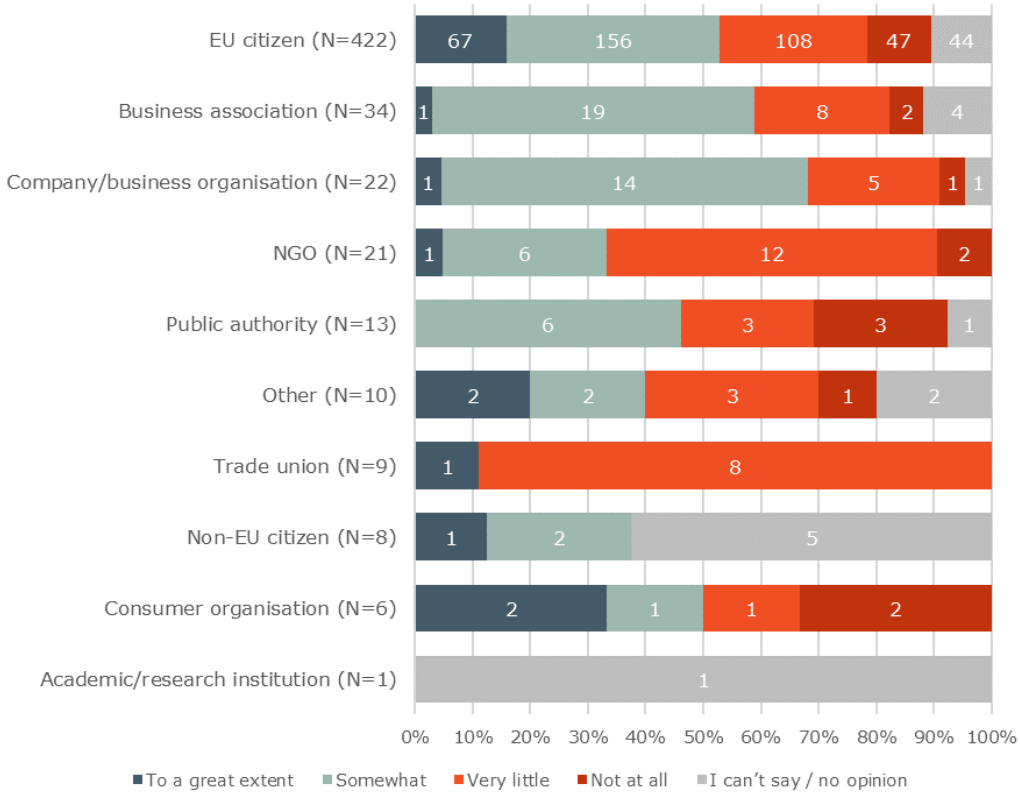
To what extent are the knowledge requirements to obtain a driving licence adapted to new technologies fitted to vehicles?



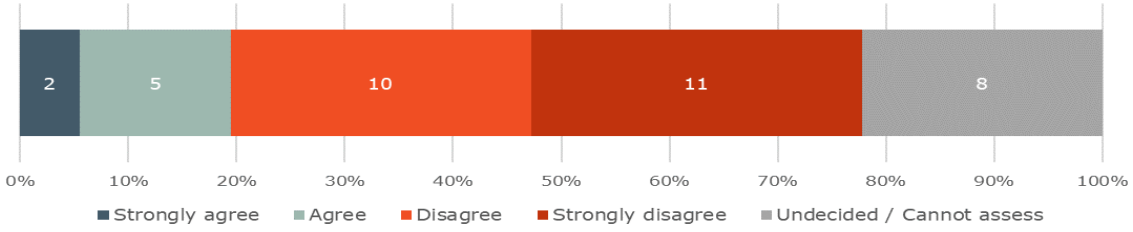
Source: Open Public Consultation Survey, Question 3.

As shown below, opinions were split across the various types of stakeholders. Notably, a large proportion of EU citizens, NGOs and trade unions considered the driving licence requirements to be very little or not at all adapted to new technologies.

To what extent are the knowledge requirements to obtain a driving licence adapted to new technologies fitted to vehicles?



To what extent do you agree with the following statements on current and future needs in terms of legal, social, and technological considerations and developments? The directive sufficiently covers the new mobility solutions such as e-scooters and other personal micro mobility solutions. (N=36)



Source: Survey with non-governmental stakeholders.

USE OF THE STAKEHOLDER INPUT FOR THE EVALUATION

Stakeholder input received during the stakeholder consultation was an important tool to address certain limitations in access to quantitative data for the evaluation. The results from the analysis of the stakeholder input have been used when answering the individual evaluation questions as a complementary source that may or may not corroborate the findings from other sources. Statements or positions brought forward by certain stakeholders have been highlighted as such.

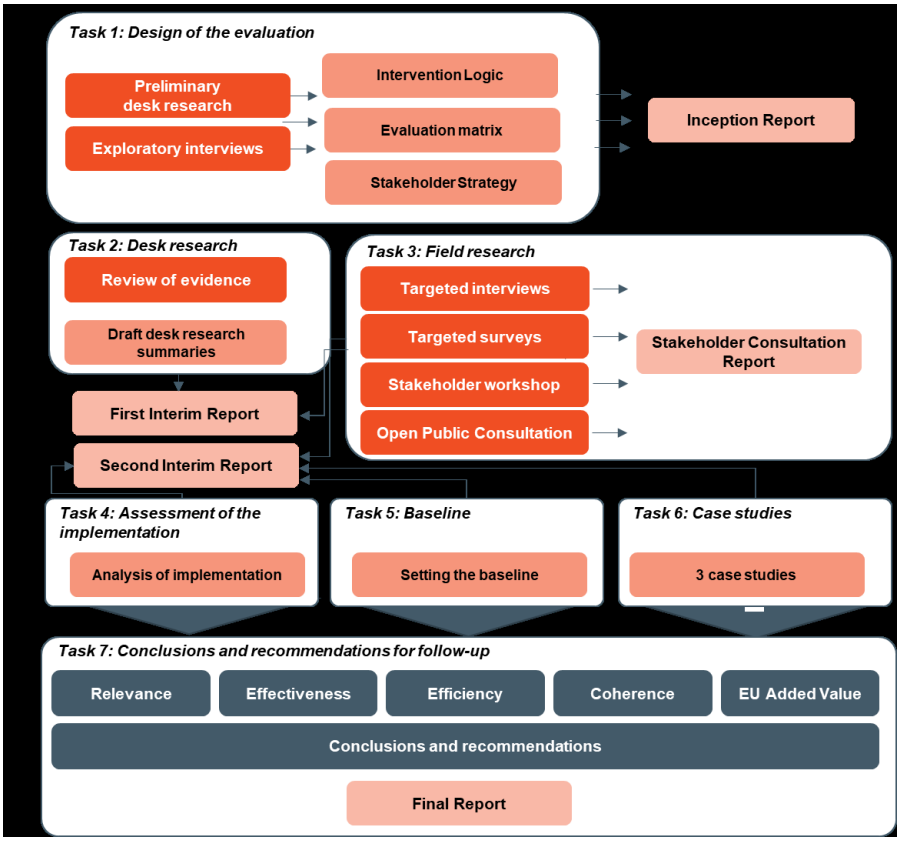
Annex 3: Methodology

(1) Methodology and sources of information

The evaluation process started in August 2019, following the Commission's Better Regulation Guidelines.[294] In the Commission, an Inter-Service Steering Group (ISSG) provided advice and monitored the progress of the exercise. Being composed of members from different Commission services and having the necessary mix of knowledge and experience, the ISSG brought together a range of different perspectives and provided the necessary input, in particular where the evaluation touched different policy areas, such as the need to consider micro mobility solutions at EU level.

A support study was carried out by an external contractor to provide input to this evaluation.[295] In accordance with the Terms of Reference, the study was structured along seven tasks, as depicted in the figure below.

Figure 4 Support Study Methodology Structure



[294] https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how/better-regulation-guidelines-and-toolbox_en

[295] Support Study to the ex-post evaluation of Directive 2006/126/EC on Driving Licences (Specific Contract MOVE/C2/2019-534/SI2.826438 under framework contract MOVE/A3/2017-257) - ISBN: 978-92-76-37815-0

The methods and tools used for the evaluation are summarised in the following paragraphs.

Review of legislative documents and reports

In order to provide the evaluation with factual information, desk research on several related issues was carried out. The aim of the desk research was to collect, organise and analyse relevant information from relevant secondary sources. This included statistical data, legislative documents, and relevant reports and studies, with the intention of collecting both quantitative and qualitative evidence to complement the primary evidence collected through field research. All findings and results were compared and synthesised to provide evidence-based answers to the evaluation questions.

The analysis was structured according to an **evaluation matrix**, presented in Annex 3. This matrix operationalised a set of evaluation questions and sub-questions, indicators and judgement criteria that would be used to answer them. It was developed on the basis of an in-depth understanding of the directive's intervention logic, taking in consideration what it aimed to achieve and how, as presented in Annex 4.

Analysis of statistical data and modelling

An analysis was conducted in order to examine and quantify wherever possible the effect of the driving licence directives on road safety (EQ 1, EQ 2.6). The findings rely on a comprehensive analysis of data on road safety indicators (the number of road fatalities is the basic road safety indicator) collected from relevant databases (CARE Database, CADaS Database, IRTAD Database, EU Pocketbook). Along with the road safety data, population, vehicle fleet, vehicle kms, GDP and infrastructure data (length of motorways) were all collected from Eurostat and other EU sources (CARE Database[296], CADaS Database[297] and IRTAD Database[298]). The different time periods selected to analyse the impact of the driving licence directive by quantifying, wherever feasible, specific indicators, are presented below.

- Before 1983: no driving licence directive in place.
- From 1983 until now: full period of the driving licence directives in place:
    - 1983-1996: Time period with the first driving licence directive in force
    - 1996-2006: Time period with the second driving licence directive in force
    - 2007-2012: Implementation period of the third driving licence directive
    - 2013-2018: Time period with the third driving licence directive fully in force

The methodological approach for the analysis includes five steps: four descriptive-exploratory steps and one statistical modelling step.

[296] Community Road Accident Database.

[297] CADaS - The Common Accident Data Set (D 1.14) is a common structure including a minimum set of standardised data elements.

[298] International Road Traffic and Accident Database (IRTAD) includes safety and traffic data, aggregated by country and year, from 1970 onwards.

Step 1 entailed a comparison of the total fatality trends before and after the first driving licence directive.

Step 2 represented a comparison of the total fatality trends after the first driving licence directive between (i) the Member States with the driving licence directive in force and (ii) the European countries without the driving licence directive in force.

Step 3 compared the total fatality trends between the first, second and third driving licence directives.

For these first 3 steps, a descriptive analysis was carried out to analyse total road accident fatality data from 1970-2018. The results of this analysis are presented as part of EQ 1.

Step 4 constituted a comparison between the fatality trends of several road users (directly affected by the driving licence directive) with those who were not directly affected, for the years 1999-2018 (due to limited data). The fourth step is based on examining the fatality trends of the following road user groups directly affected by the directive: novice drivers due to changes to harmonised rules on driving examiners and better training; motorcyclists and moped riders due to modifications of driving licence categories and especially the graduated access system for motorcycles starting from the new AM category.

Step 4 also contains a descriptive analysis, which is presented in EQ2.6 and is a step prior to the modelling step which follows.

Step 5 involved the development of 7 statistical models (Generalised Linear Mixed Models) which use panel data for all available European countries in order to predict the direct effect (inferring causality) of the driving licence directive and other factors on road safety in Europe, and more specifically on: *Total Road Accident Fatalities per million population; Driver Fatalities per million population; Novice Driver Fatalities per million population; Elderly Driver Fatalities per million population; Professional Driver Fatalities per million population, PTW Fatalities (Mopeds + Motorcyclists) per million population; Motorcyclist Fatalities per million population*.

For Step 5, the methodological approach relies on quantifying the impact that the driving licence directives have had on the seven (7) target variables mentioned above. In order to develop the models, other variables aside from the driving licence directive's effect on road safety were also selected to be included. When selecting the variables to be included in the statistical model, desk research was conducted to identify the most critical parameters relevant to the driving licence directive and road safety. The modelling methodology is presented in detail in the support study. When developing the database it was decided that the key variables to be inserted in the model in order to quantify their impact on the target "fatalities per million population" variable were: *per capita GDP (Gross Domestic Product); vehicle fleet per population; driving licence directives; Directive 2003/59/EC on professional driver training; Directive 2008/96/EC on road infrastructure safety management*.

Field research

The field research consisted of public consultation and a range of targeted consultation activities detailed in Annex 2. Nine-stakeholder groups[299] were consulted in the context of the study by the following means:

A targeted survey was launched on 31 August and was open until 11 December 2020. It was targeted to a range of different stakeholder groups, including national competent authorities, but also all different industry sectors, and associative stakeholders representing road safety and road users associations, drivers' school associations, drivers' associations, automotive and motorcycle federations, international road transport associations, and vehicle manufacturer associations. This online survey included questions on the effectiveness, relevance, and EU added value of Directive 2006/126/EC. The questionnaire for national authorities was answered by national authorities covering all 27 Member States. National authorities from Iceland and Norway also provided responses to the questionnaire. The questionnaire for non-governmental stakeholders was answered by 41 participants.

Targeted interviews aimed to complement the questionnaires by collecting more details on why stakeholders hold certain opinions, as well as to gather additional evidence in relation to evaluation questions for which qualitative data was judged to be an important source. A total of 40 interviews were planned, out of which 29 were effectively carried out with a sample of key stakeholders per main stakeholder type. The interviews included 9 representatives of national authorities, 13 non-governmental stakeholders (associations and other organisations) and 2 representatives from the European Commission.

A stakeholder workshop was organised with competent authorities on 16 October 2020, aimed at the validation and discussion of preliminary findings with the stakeholder community. 66 participants attended, including representatives from driving licence authorities, transport safety associations, road user associations, driving school associations, automotive associations and a motorcycle federation.

An open public consultation[300] was held from 28 October 2020 until 20 January 2021. The consultation specifically related to the relevance, effectiveness, coherence, efficiency and EU added value of the directive. A total of 546 responses were received.

Three case studies were carried out the methodology for establishing a link between the directive and its effects on road safety and free movement of citizens and quantifying them, on digital driving licences and on accompanied driving.

The data collected was used to respond to the evaluation questions. All of the analytical findings constitute the basis for the assessment on how the directive has scored on the

[300] The open public consultation was organised by the European Commission and consisted of an online questionnaire published on a dedicated Commission webpage. It was accessible to the general public and any person interested in the topic could have submitted a contribution.

evaluation criteria. Each of these criteria was addressed through evaluation questions, as presented in the evaluation question matrix presented below.

(2) Limitations and robustness of findings

Even though the evaluation was designed to ensure the robustness of the evidence supporting its findings, limitations to the robustness of certain conclusions were identified while conducting the analysis, and such limitations are inherent to this type of exercise.

Limitations related to the COVID-19 crisis

The analysis of the effect on road safety covers the period 2006 up to 2018. Thus, the study does not factor in recent socio-economic developments, specifically the COVID-19 crisis that had an unprecedented impact on transport and mobility of European citizens, bringing travel largely to a standstill for several months. Unprecedented reductions in traffic volumes have been reported across Europe since confinement measures associated with the COVID-19 pandemic were introduced.[301] Nevertheless this reduction did not lead to prolonged period of reductions in fatalities and, in some countries, no reductions at all because some drivers increased speed.

Limitations concerning the stakeholder consultation

A key source of information were stakeholder consultation activities. Several challenges were encountered in the collection of data from stakeholders, but mitigation actions were taken. Some key limitations related to the stakeholder activities include the engagement of stakeholders, particularly in light of the COVID-19 lockdown restrictions.

For the survey with the non-governmental authorities, 41 responses were received and covered several stakeholder groups. Given the relatively limited number of responses, the findings from the survey of non-governmental authorities are not representative of the full population of non-governmental stakeholders that are affected by the driving licence directive.

For the open public consultation, the consultation received a total of 546 responses, a large proportion of them from the Netherlands (313). This is interpreted as a possible result of coordinated action of certain categories of stakeholders. To overcome this limitation, the evaluation presents in a transparent manner the data sources and the findings and highlights questions where there was a high proportion of stakeholders answering in the same or similar manners. Moreover, the total number of responses does not constitute a representative sample of EU citizens, not even of those directly affected by the directive. Thus, the results of the consultation cannot be interpreted to represent the views of all of the affected citizens.

[301] https://etsc.eu/pin-briefing-the-impact-of-covid-19-lockdowns-on-road-deaths-in-april-2020/

Limitations concerning data availability

The evaluation takes place 40 years after the implementation of the first driving licence directive. This long timespan has important implications in terms of data availability for defining the baseline scenario, which gives rise to limitations in terms of the measurability of effects, outcomes, results, costs, and benefits arising from the driving licence directive. To overcome this lack of data, some assumptions had to be made, relying on desk research, consultation of stakeholders, and results of statistical modelling of road safety trends which ensures that the results are as robust and credible as possible.

Concerning the analysis of the *effect of European driving licence rules on road safety (effectiveness),* statistics on road accident fatalities are available from 1970 until present but only as total figures. Although providing robust evidence, the statistical modelling has several limitations, since road safety can be affected by many factors beyond the driving licence directives (such as legislative, policy[302], technological and demographic factors).

However, such policies, programmes and actions cannot be included in statistical models, as they are not specific directives or guidelines that Member States would implement. In order to mitigate this limitation, the effects of such factors on road safety developments were taken into account and statistically estimated[303] together with all other developments not included in the model as separate variables (e.g. vehicle technology, road infrastructure, legislation changes etc.).

Concerning the contribution of the driving licence directive to *facilitating free movement across EU for EU citizens* (EQ 1), literature concerning the movement of persons across the borders and its relation to driving licence rules is very limited and mostly provides qualitative assessments of the extent to which the two are related. Similarly, statistical data on this is not available to monitor and assess the trends over time and the effect of the driving licence directive on free movement. This constitutes a key limitation of the analysis. To mitigate this limitation, qualitative evidence was collected through stakeholder consultation to ascertain the perceived effect that the directive has had.

Concerning the assessment of the *impact of the directive on driving licence tourism and driving licence fraud* (EQ 2.3), a key limitation constitutes the fact that there are no consistent statistics on driving licence fraud.

Concerning the analysis of the effect of the *absence of a common framework on driving' disqualifications on road safety* (EQ 6), data on the frameworks in place in countries that mutually recognise disqualifications was not made available in the data collection processes. Nevertheless, the analysis is still robust as it relies on evidence collected through desk research (e.g. analysis of Court of Justice rulings) as well as comprehensive consultation activities.

[302] For instance, the Road Safety Action Programme (2003-2010), the Communication providing policy orientations on road safety for the period 2011-2020 and, most recently, the Valetta Declaration and the EU Road Safety Policy Framework 2021 -2030 – Next steps towards 'Vision Zero'

[303] This was done through the random effects of the model.

The analysis of efficiency (EQ 9 – 11) is relying on data collected via several data collection streams, including desk research and surveys of national authorities. Limitations concerning the analysis concern the availability of precise costs and administrative burden data associated with the driving licence directive. The analysis is essentially quantitative with diverging views between national authorities that consider that administrative burden and costs have been reduced, while citizens do not seem to have perceived that reduction.

(3) Evaluation questions matrix

Effectiveness

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
EQ 1: At the level of its general objectives, to what extent (in quantitative and qualitative terms) has the directive contributed a) to enhance road safety b) to facilitate free movement for EU citizens? What have been the effects (positive or negative impacts) of the directive?				
EQ 1.1: To what extent has the directive contributed to enhanced road safety?	EQ 1.1: The directive contributed to enhanced road safety.	Trends in road traffic fatalities and/or serious injuries (compared to baseline)	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.22 Overview of future measures for improvement in the area of road safety); Road Safety Atlas[304] and Annual Accident Report[305], based on Community database on Accidents on the Roads in Europe; European Commission (2019), Preliminary Road Safety Statistics[306]. • Databases: Eurostat (Transport Accident Statistics[307] and Transport Safety Statistics[308]); International Road Traffic Accident Database (IRTAD)[309]; ERF Statistics (2019)[310]; • TRID database[311]	Comparison of road safety data trends (road fatalities and/or serious injuries) for different road user categories with the total road safety trends will allow us to assess how much provisions of the directive affecting different road user groups (such as motorcycle riders, novice and young riders, etc.) have contributed to improved road safety trends.

[304] https://ec.europa.eu/transport/road_safety/specialist/statistics_en

[305] https://ec.europa.eu/transport/road_safety/statistics-and-analysis/data-and-analysis/annual-statistical-report_en

[306] https://ec.europa.eu/commission/news/road-safety-2019-apr-04_en

[307] https://ec.europa.eu/euros tat/statistics-explained/index.php?title=Archive:Transport_accident_statistics

[308] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Category:Transport_safety

[309] https://stats.oecd.org/Index.aspx?DataSetCode=IRTAD_CASUAL_BY_AGE

[310] https://erf.be/statistics/safety-2019/

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			• Targeted survey with all stakeholder categories • Targeted interviews with selected stakeholder groups • Open Public Consultation	
EQ 1.2: To what extent has the directive contributed to facilitation of free movement for EU citizens?	EQ 1.2: The directive contributed to facilitation of free movement for EU citizens.	Contribution of provisions of the directive to free movement of citizens	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 3.3. Overview of fees for driving licences before and after implementation of the third driving licence directive). • Databases: Eurostat (e.g. EU citizens living in another Member State - statistical overview)[312] for estimation of number of EU citizens moving from one country to another from) • Targeted survey with national authorities and drivers' associations and drivers school associations and road users' associations / civil society and their members • Targeted interviews with selected stakeholder groups	Analysis of provisions of the directive or factors related to the directive that contributed to free movement (e.g. provisions on common licence, costs for driving licence renewal/ exchange/ replace).
		• Measures (at Member State level) for mutual recognition of driving	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.2 Overview of future measures	Based on the desk and field research, the study team analysed which measures have been adopted by the Member

[311] Combines the records from TRB's Transportation Research Information Services (TRIS) Database and the OECD's Joint Transport Research Centre's International Transport Research Documentation (ITRD) Database.

[312] https://ec.europa.eu/eurostat/statistics-explained/index.php/EU_citizens_living_in_another_Member_State_-_statistical_overview

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		licences in another Member State	for improvement in the area of freedom of movement). • Targeted survey to national authorities, drivers' associations and drivers school associations and Road safety and road users' associations / civil society and their members • Targeted interviews with selected stakeholder groups	States to implement the provision on mutual recognition of driving licences. Changes since the implementation of this provision would indicate positive developments regarding facilitation of free movement of the EU citizens.
EQ 2. At the level of specific objectives: EQ 2.1: To what extent has the administrative burden for drivers and Member States been reduced, particularly when a driver changes his Member State of residence and subsequently the new Member State of residence exchanges his driving licence issued in another Member State? What are the remaining obstacles or difficulties in such a case?				
EQ 2.1: To what extent has the administrative burden been reduced for drivers and Member States?	EQ 2.1: The administrative burden has been reduced for drivers and Member States, particularly in the case of change of residence.	• Administrative burden for first issuing, renewal, exchange, replacement of driving licences for citizens	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.16 effects of administrative validity periods on costs for citizens). • Targeted survey with national authorities and non-governmental stakeholders	Analysis of provisions of the directive that have led to increased / decreased administrative burden for citizens and Member States national authorities.
		• Processing time and required documentation for issuing, exchanging, replacing and renewing of driving licences for national authorities	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 3.2 Overview of the duration of administrative processes for driving licences). • Targeted survey with Member State authorities, drivers' associations and drivers school associations • Targeted interviews with selected stakeholder groups	

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Types of difficulties and obstacles for drivers wanting to change their driver licence in another Member State	• Reports and studies: e.g. European Commission (2017), Implementation study • Targeted survey with national authorities and non-governmental stakeholders	
EQ 2.2: In which areas (e.g. validity periods, medical exams, training or testing) have uniform driving licence rules and requirements been established across Member States? In which areas are there still divergences?				
EQ 2.2: To what extent have uniform driving licence rules and requirements been established across the Member States concerning validity periods of driving licence, medical checks and trainings?	EQ 2.2: Uniform driving licence rules and requirements have been established across the Member States concerning validity periods of driving licence, medical checks and trainings	• Instances of discrepancies in administrative validity periods for driving licence categories • Instances of discrepancies in administrative validity periods for replacing driving licences • Instances of discrepancies in limited administrative validity periods for first licence issued to novice drivers • Instances of discrepancies in medical checks upon renewal for driving licence categories A-B	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.2 Overview of administrative validity periods for driving licence category A-B, Table 4.3 Motivation for chosen administrative validity period for driving licences of categories A-B, Table 4.4 administrative validity period of replacement driving licence., Table 4.5 administrative validity periods for driving licence category B and C, Table 4.6 for first licence issues to novice drivers (categories A-B and C-D), Table 4.7 limited administrative validity periods, Table 4.17 medical examination for categories AM/A1/A2/A/B1/B upon renewal, Table 4.18 medical examination for categories C, CE, C1, C1E, D, DE, D1, D1E upon renewal, Table 4.23 future measures for improvement in the area of medical checks); European Commission (2017), Study on driver training, testing and medical fitness (2017); CIECA (2017), Guide on Driver Licencing: The driving licence encyclopaedia of the International Commission for Driver Testing[313]. • Targeted survey with Member State authorities and other stakeholders	The study team will update the existing information regarding discrepancies in specific driving licence rules and requirements by consulting Member States and asking them to validate/ update existing mappings on variations in terms of implementation of different provisions in the Member States.

[313] The information is available to CIECA members. See: https://www.cieca.eu/

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Instances of discrepancies in mandatory medical examinations for categories C-D upon renewal • Instances of discrepancies in minimum standards for driving examiners including quality assurance and regular periodic training	• Targeted interviews with selected stakeholder groups	
EQ 2.3: To what extent have the possibilities of driving licence fraud and "driving licence tourism" been reduced?				
EQ 2.3: To what extent have driving licence fraud and driving licence tourism been reduced due to the directive?	EQ 2.3: Fraud and driving licence tourism have been reduced due to the directive.	• Instances of driving licence fraud/ forgery and driving licence tourism	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.21 Overview of future measures for improvement in the area of anti-fraud protection, Table 8.4 overview of the effects of RESPER on driving licence fraud); EReg Topic Group X (2011), Report on Driving Licence Tourism. • Infringement proceedings • Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER)* • Targeted survey with national authorities, drivers' associations and drivers school associations • Targeted interviews with selected stakeholder groups • Open Public Consultation	Analytical approach as described under EQ 1.1 on trends in instances of driving licence fraud/forgery and driving licence tourism

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Level of use and exchange of information via RESPER by authorities when issuing, exchanging, replacing, renewing, revoking driving licences	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 7.3 overview of the system being used to connect to RESPER, Table 7.4 and 7.5 on the interface of RESPER system, Table 7.6 average number of monthly sent and received requests through RESPER). • Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER)* • Targeted survey with Member State authorities, RESPER representatives • Targeted interviews with selected stakeholder groups	Based on the information provided by EC expert on RESPER and information provided by Member States in interviews and survey, the study team will analyse the frequency and situations in which information accessed via RESPER has been used by competent authorities. The analysis will look also into other possible procedures to verify normal residence in order to assess, whether driving licence fraud and driving licence tourism can be successfully detected by the Member States.
		• Procedures to verify normal residence in different Member States	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.12: Overview of procedure to check normal residence); EReg Topic Group X (2012), Report on Normal Residence. • Targeted survey with Member State national authorities, road safety and road users' associations / civil society and their members, transport associations • Targeted interviews with selected stakeholder groups • Open public consultation	
EQ 2.4: To what extent have the driving skills of non-professional and professional drivers been raised?				
EQ 2.4: To what extent	EQ 2.4: The driving skills of	• Change in the level of skills of	• Reports and studies: e.g. European Commission (2017), Study on	Based on the results from desk

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
have the driving skills of non-professional and professional drivers increased as a result of the provisions of the directive?	non-professional and professional drivers have increased as a result of the provisions of the directive.	professional drivers (e.g. knowledge and understanding of driving and assessment competences, personal driving skills and quality of service, vehicle technique and physics requirements)	driver training, testing and medical fitness. • Targeted survey with national authorities, drivers' associations and drivers school associations and road transport associations • Targeted interviews with selected stakeholder groups • Open public consultation	review and additional field research, the team will explore whether targeted stakeholders perceive improvements in driving skills for professional and non-professional drivers.
		• Change in the level of skills of non-professional drivers	• Reports and studies: e.g. European Commission (2017), Study on driver training, testing and medical fitness. • Targeted survey with national authorities, drivers' associations and drivers school associations and road transport associations • Targeted interviews with selected stakeholder groups • Open public consultation	
EQ 2.5: To what extent have the provisions on the qualification of driving examiners contributed to safe driving? Is the relevant monitoring framework fit for that purpose?				
EQ 2.5: To what extent have the provisions on the qualification of driving examiners contributed to safe driving?	EQ 2.5: The provisions on the qualification of driving examiners contributed to safe driving (with less road fatalities and/or serious injuries).	• Requirements for qualifications for driving examiners at the level of Member States	• Reports and studies: e.g. European Commission (2017), Study on driver training, testing and medical fitness, European Commission (2014), Novice driver preparation - an international comparison. • Targeted survey with national authorities, drivers' associations and drivers school associations and road transport associations	The study team analysed Member States' national requirements for qualifications for driving examiners at the level of Member States and how important these provisions are for road safety as perceived by

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			• Targeted interviews with selected stakeholder groups	various stakeholders. The conclusion will be made on the assumption that a better qualified examiner means lower probability of novice drivers involved in road fatalities and/or serious injuries.
		• Extent to which the requirements of qualifications for driving examiners led to safe driving	• Targeted survey with national authorities, drivers' associations and drivers school associations and road transport associations • Targeted interviews with selected stakeholder groups	
		• Novice drivers involved in road fatalities and/or serious injuries	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.22 Overview of future measures for improvement in the area of road safety); Road Safety Atlas[314] and Annual Accident Report[315], based on Community database on Accidents on the Roads in Europe; European Commission (2019), Preliminary Road Safety Statistics[316]. • Databases: Eurostat (Transport Accident Statistics[317] and Transport Safety Statistics[318]); International Road Traffic Accident Database (IRTAD)[319]; ERF Statistics (2019)[320]; • TRID database[321]	

[314] https://ec.europa.eu/transport/road_safety/specialist/statistics_en

[315] https://ec.europa.eu/transport/road_safety/sites/roadsafety/files/pdf/statistics/dacota/asr2018.pdf

[316] https://ec.europa.eu/commission/news/road-safety-2019-apr-04_en

[317] https://ec.europa.eu/euros tat/statistics-explained/index.php?title=Archive:Transport_accident_statistics

[318] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Category:Transport_safety

[319] https://stats.oecd.org/Index.aspx?DataSetCode=IRTAD_CASUAL_BY_AGE

[320] https://erf.be/statistics/safety-2019/

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			• Targeted survey with all stakeholder categories	
EQ 2.6: To what extent have novice and/or young motorcycle drivers been protected in terms of road safety?				
EQ 2.6: To what extent are the provisions for novice and young motorcycle drivers sufficient to ensure road safety?	EQ 2.6: The provisions for novice and young motorcycle drivers are sufficient to ensure road safety.	• Number of young and novice motorcycle drivers involved in traffic fatalities and/or serious injuries	• Reports and studies: e.g. Road Safety Atlas[322] and Annual Accident Report (2018); Study on driver training, testing and medical fitness (2017); SafetyNet (2009); Novice Drivers, DaCoTA (2012); Novice Drivers ERSO (2015); European Commission (2018); Novice Drivers	Based on statistical analysis, field research and desk research an assessment of the impact of the provisions of the directive on novice and motorcycle divers was made.
EQ 2.7: To what extent has the application and the enforcement of driving licence rules by Member States been facilitated?				
EQ 2.7: To what extent has the application and enforcement of driving licence rules has been facilitated?	EQ 2.7: The application and enforcement of driving licence rules has been facilitated by RESPER.	• Number of Member States connected to RESPER through national database directly and through EUCARIS	• Reports and studies: European Commission (2017), Implementation study (e.g. Table 8.2: Overview of RESPER characteristics). • Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER)*	The study team will assess usefulness and reliability of information accessed through RESPER as perceived by national competent authorities. This analysis will lead to a conclusion, whether RESPER is a successful tool for application and the enforcement of driving licence rules.
		• Level of use and exchange of information via RESPER by Member States in terms of information on the licences they have issued, exchanged, replaced,	• Reports and studies: e.g. Grimaldi (2012), Assistance with the verification of compliance of national legislative measures implementing Directive 2006/126/EC, as amended by directive 2009/113/EC (Horizontal assessment report); European Commission (2017), Implementation study (e.g. Table 8.2: Overview of RESPER	

[321] Combines the records from TRB's Transportation Research Information Services (TRIS) Database and the OECD's Joint Transport Research Centre's International Transport Research Documentation (ITRD) Database.

[322] https://ec.europa.eu/transport/road_safety/specialist/statistics_en

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		renewed or revoked	characteristics). • Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER)* • Targeted survey and interviews with national driving licence authorities • Open public consultation	
	EQ 2.7: The application and enforcement of driving licence rules has led to reduced number of instances of driving licence fraud and driving licence tourism.	• Instances of driving licence fraud and driving licence tourism	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.21 Overview of future measures for improvement in the area of anti-fraud protection, Table 8.4 overview of the effects of RESPER on driving licence fraud); EReg Topic Group X (2011), Report on Driving Licence Tourism. • Infringement proceedings, Rulings of the Court of Justice • Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER)* • Targeted survey with national authorities, drivers' associations and drivers school associations • Targeted interviews with selected stakeholder groups • Open Public Consultation	See analytical approach under EQ 1.1 on instances of driving licence fraud and driving licence tourism. Reduced number of instances of driving licence fraud and driving licence tourism would support the assumption that application and enforcement of driving licence rules has been facilitated.
EQ 3: To what extent has RESPER facilitated the objectives of the directive and what are its shortcomings, if any?				

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
EQ 3.1: To what extent has RESPER facilitated the achievement of the general objectives of the directive?	EQ 3.1: RESPER facilitated the achievement of objectives of the directive (i.e. free movement of people and road safety).	• Level of simplification of administrative processes for checking driving licence validity	• Reports and studies: e.g. European Commission (2017), Implementation study (Annex 8: Table 8.6: Overview of the effects of RESPER on the update and verification of driving licence information, Table 8.16: Overview of future measures for improvement in the area of enforcement, Table 8.7: Overview of the procedure to check the validity of an applicants' request in different situations (Before RESPER), Table 8.8: Overview of the procedure to check the validity of an applicants' request in different situations (After RESPER). • Targeted survey with different stakeholders, Member State authorities, national driving licence authorities and road safety, road users' associations / civil society and their members • Targeted interviews with selected stakeholder groups • Open public consultation	Based on the existing research and additional field research (survey and interviews), the study team will assess, whether the introduction of RESPER has led to simplified procedures for checking driving licence validity. Simplification will be measured in terms of availability of information and verification tools, as well as Member States' general perceptions.
		• Level of use and exchange of information via RESPER by Member States in terms of information on the licences they have issued, exchanged, replaced, renewed or revoked	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 8.2: Overview of RESPER characteristics). • Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER)* • Targeted survey with national driving licence authorities • Targeted interviews with selected stakeholder groups • Open public consultation	See analytical approach under EQ 2.7 level on use and exchange of information via RESPER by Member States in terms of information on the licences they have issued, exchanged, replaced, renewed or revoked

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Instances of document fraud identified with the aid of RESPER	• Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER)* • Targeted survey with national authorities, drivers' associations and drivers school associations • Targeted interviews with selected stakeholder groups • Open Public Consultation	The aim of this indicator is to identify a proportion of document fraud instances identified with the aid of RESPER as compared to other possible sources.
EQ 3.2: Do RESPER facilities have any shortcomings that need to be overcome to further facilitate the achievement of the objectives?	EQ 3.2: RESPER has/does not have shortcomings that need to be overcome to further facilitate the achievement of the objectives.	• Shortcomings/ areas for improvement of RESPER	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 8.2: Overview of RESPER characteristics). • Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER)* • Targeted survey with different stakeholders, Member State authorities and national driving licence authorities • Targeted interviews with selected stakeholder groups	Based on the existing research and additional field research (survey and interviews), the study team will assess, whether stakeholders identify any shortcomings and areas for improvements.
		• Level of usefulness of RESPER services (e.g. Search Driving Licence by Name, Get Driving Licence Details, Notify Driving Licence Status, Secure Message)	• Reports and studies: e.g. European Commission (2017), Implementation study (Table 7.7: Overview of how satisfied the Member States are with the SDLN service in RESPER, Table 7.8: Overview of the way in which Member States send SDLN requests and Table 7.9: Overview of issues with Member States not responding to SDLN requests, Table 7.10: Overview of how satisfied the Member States are with the GDLD service in RESPER, Table 7.11: Overview of how the GDLD services is applied by each Member State and Table 7.12: Overview of issues with Member	Based on the existing research and additional field research (survey and interviews) to update the existing knowledge, the study team will assess usefulness of RESPER services as perceived by relevant stakeholders.

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			States not responding to GDLD requests, Table 7.13: Overview of how satisfied the Member States are with the NDLS service in RESPER and Table 7.14: Overview of issues with Member States not responding to NDLS requests, Table 7.15: Overview of the implementation and use of secure messages, Table 7.16: Overview of how satisfied the Member States are with the secure messages service in RESPER and Table 7.17: Overview of issues with Member States not responding to secure messages). • Data from RESPER network *(to be determined based on input from DG MOVE on the contents of RESPER.)* • Targeted survey with national driving licence authorities, RESPER • Targeted interviews with selected stakeholder groups	
EQ 4: To what extent the possible differences between Member States resulting from the lack of minimum and/or harmonised training obligations for learner drivers have had an impact on road safety?				
EQ 4.1: To what extent have differences between Member States in terms of training requirements an impact on road safety?	EQ 4.1: Differences between Member States in terms of training requirements have an impact on road safety.	• Training obligations and requirements in the Member States for novice drivers	• Reports and studies: European Commission (2017), • Study on driver training, testing and medical fitness; Mapping by the European Driving School Association on requirements for novice drivers; ETSC (2018), Briefing: 5th EU Road Safety Action Programme 2020-2030; Study on driver training, testing and medical fitness (2017). • Targeted survey to national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members, insurance companies, road transport associations, insurance companies	The study team will update the existing mapping on training requirements with further field research.

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			• Targeted interviews with selected stakeholder groups • Case study 3 – Accompanied driving for category B driving licences • Open public consultation	
		• Level of impact of varying requirements and obligations for training in the Member States on road safety	• Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members, insurance companies, road transport associations, insurance companies • Targeted interviews with selected stakeholder groups • Open public consultation	Impact of varying training requirements and obligations on road safety will be analysed through stakeholder consultations, including targeted survey, interviews and Open Public Consultation.
		• Number of novice drivers involved in traffic fatalities and/or serious injuries	• Reports and studies: e.g. Study on driver training, testing and medical fitness (2017). • Targeted survey with driver's associations and drivers school associations, road safety and road users' associations / civil society and their members, road transport associations • Targeted interviews with selected stakeholder groups • Open public consultation	The assumption made here is that harmonised training obligations for learner drivers leads to lower probability of novice drivers involved in road fatalities and/or serious injuries. The analytical approach is aligned with the baseline approach.
EQ 5: What has been the impact, if any, of differences across Member States regarding the recognition of driving licences issued by third countries, for example in relation to driver shortage for EU hauliers?				

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
EQ 5.1: To what extent have differences across Member States on recognition of driving licences issued by third country an impact on driver shortage and other issues?	EQ 5.1: Differences across Member States on recognition of driving licences issued by third country had an impact on driver shortage and other issues.	• Differences between Member States in recognition of driving licence issued by third countries (e.g. processing, validating, renewing driving licence)	• Targeted survey with interviews with different stakeholders, Member State authorities • Targeted interviews with selected stakeholder groups • Open public consultation	Based on the results from field research, the team will identify any issues that the Member States might encounter due to the differences across Member States regarding the recognition of driving licences issued by third countries.
		• Types and scale of impact of the different procedures for handling driving licence from third country on driver shortage (e.g. for EU hauliers)	• Targeted survey with interviews with different stakeholders, Member State authorities • Targeted interviews with selected stakeholder groups • Open public consultation	
EQ 6: What has been the impact, if any, of the absence of an EU framework for the mutual recognition of driving disqualifications on road safety in general and on driving licence tourism in particular?				
EQ 6.1: To what extent has the absence of an EU framework for the mutual recognition of driving disqualifications an impact on road safety, particularly concerning driving licence tourism?	EQ 6.1: The absence of an EU framework for the mutual recognition of driving disqualifications had an impact on road safety, particularly concerning driving licence tourism.	• Current practices in terms of mutual recognition of driving disqualifications in the Member States	• Reports and studies: e.g. Evaluation Study on the Application of directive 2011/82/EU Facilitating the Cross-Border Exchange of Information on Road Safety Related Traffic Offences. • Targeted survey of national authorities • Targeted interviews with selected stakeholder groups	Based on the results from the existing research and additional field research, the team will identify any issues that the Member States might encounter due to the absence of an EU framework for the mutual recognition of driving disqualifications, especially in

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Type and scale of impact of absence of EU framework for mutual recognition of driving disqualifications on road safety and driving licence tourism	• Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members, insurance companies, road transport associations, insurance companies • Targeted interviews with selected stakeholder groups • Open public consultation	terms of driving licence tourism.
EQ 7: Which factors have contributed to/hindered the achievement of objectives?				
EQ 7.1: Which types of factors have hindered or contributed to achieving road safety?	EQ 7.1: Types of factors that have hindered or contributed to achieving road safety	• Typology of factors that have contributed or hindered the achievement of road safety	• Reports and studies: e.g. WHO Global Status Report on Road Safety (2018). • Targeted survey of national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members, insurance companies, road transport associations, insurance companies • Targeted interviews with selected stakeholder groups • Open public consultation	Based on the results from the existing research and additional field research, the team will identify any types of factors that have hindered or contributed to achieving road safety and free movement of EU citizens.
EQ 8: Has the directive led to any positive or negative unexpected effects?				
EQ 8.1: Has the directive led to any unexpected effects?	EQ 8.1: The directive has led to unexpected effects.	• Unintended positive effects of the directive (e.g. citizens benefiting from improved transport security)	• Evidence collected under the previous questions on effectiveness • Targeted survey of national driving licence authorities, drivers'	Based on the results from the field research, the team will identify any positive or negative unexpected effects as perceived

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Unintended negative effects of the directive (e.g. novice drivers facing increased costs for obtaining driving licence, more unlicenced novice drivers)	associations and drivers school associations, road safety and road users' associations / civil society and their members, insurance companies, road transport associations, insurance companies • Targeted interviews with selected stakeholder groups • Open public consultation	by various stakeholders.

Efficiency

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
EQ 9: Has the directive resulted in any excessive costs/negative impacts as regards **EQ 9.1. Introducing a national driving licence based on a new single Community Model?**				
EQ 9.1.1: What have been the costs and burden for introducing a national driving licence based on a new single Community Model?	EQ 9.1.1: Costs and burden for introducing a national driving licence based on a new single Community Model.	• Costs associated with the new EU driving licence model for EU citizens (e.g. processing fees	• Reports and studies: e.g. European Commission (2017), Implementation study: Chapter 3.1 Union Model Licence, Table 3.3 Overview of fees for driving licences before and after implementation of the third driving licence directive). • EC webpage: Europa.eu[323] (information by national authorities of all Members States except HR, LT and SK on the process of driving licence renewal in another EU country; on driving licence recognition, exchange). • Targeted survey with Member State authority's driver's associations and driver's school associations, road safety and road users' associations / civil society and their members, road transport associations and industry associations	The study team will assess based on the existing research and additional field research, whether the introduction of the new driving single Community Model has led to additional costs and administrative burden for the EU citizens.

[323] https://europa.eu/youreurope/citizens/vehicles/driving-licence/driving-licence-renewal/index_en.htm

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			• Targeted interviews with selected stakeholders	
		• Level of administrative burden associated with the new EU driving licence model for EU citizens (processing time, requirements for application)	• Reports and studies: e.g. European Commission (2017), Implementation study: Chapter 3.1 Union Model Licence (in particular information on costs for citizens. • Targeted survey and interviews with Member State authority's driver's associations and driver's school associations, road safety and road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholders	
		• Level of administrative burden associated with the new EU driving licence model of for national authorities (e.g. changes in staffing costs related to processing the single Community Model driving licence)	• Reports and studies: e.g. European Commission (2017), Implementation study: Chapter 3.1 Union Model Licence (in particular information on data storage, duration of administrative processes, and administrative burden for public administration before and after the introduction of the Union Model Licence, e.g. Table 3.2: Overview of the duration of administrative processes. • Targeted survey and interviews with Member State authorities • Targeted interviews with selected stakeholders	
EQ 9.1.2: What have been the benefits and other types of impacts of the introduction of the national	EQ 9.1.2: Benefits and other types of impacts of the introduction of the national driving licence based on a	• Change in number of fraud cases and level of security since the introduction of the new single	• Findings and data sources under EQ 1.1 on trends in instances of driving licence fraud and driving licence tourism	Based on the existing research and additional field research, the study team will assess trends of driving licence fraud since the introduction of the new single Community

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
driving licence based on a new single Community Model?	new single Community Model	Community Model	• Reports and studies: e.g. European Commission (2017), Implementation study: Chapter 3.1.3 Overview and assessment of advanced and future functionalities and reliability (in particular the information on advanced anti-fraud measures, status of implementation of the microchip, potential of non-physical driving licence, digital features for physical driving licence, etc.). • Targeted survey and interviews with national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members as well as road transport associations • Targeted interviews with selected stakeholders • Open Public Consultation	Model (to the extent that such data is available). Reduced number of driving licence fraud and driving licence tourism means reduced number of unlicenced drivers, who have not been properly trained. Such unlicenced drivers pose danger for themselves and other road users and therefore less fraud translates into a positive benefit for all road users.
		• Change in number of different licence models in circulation across the EU	• Studies and reports: e.g. European Commission (2015), Driving Licence Handbook. • EC webpage: Driving licence models - Europa website[324]	Based on the existing research and additional field research, the study team will assess whether the introduction of the national driving licence based on a new single Community Model has led to a reduced number of different licence models across the EU. Reduced number will showcase simplification of validity checks across the EU as a benefit for the competent national authorities.

[324] See: https://ec.europa.eu/transport/road_safety/topics/driving-licence/models_en

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
EQ 9.2. Establishing uniform driving licence rules and requirements? And in particular as regards age limits, driving licence validity periods and exceptions?				
EQ 10.2.1: What have been the costs and burden for harmonisation of age limits, driving licence validity periods and the exceptions?	EQ 10.2.1: Costs and burden for harmonisation of age limits, driving licence validity periods and the exceptions	• Compliance costs in relation to driving licence renewal requirements (e.g. validity period, physical and mental fitness examination, age limits) • Costs and administrative burden for authorities in relation to requirements related to renewal of driving licences (e.g. validity periods and exemptions, age limits)	• Targeted survey with national driving licence authorities, drivers' associations and drivers school associations • Targeted interviews with selected stakeholders • Reports and studies: e.g. European Commission (2017), Implementation study: Chapter 4.1.2 Harmonised administrative validity periods and medical checks, Chapter 3.3 Modification of driving licence categories, Chapter 3.1.2.6 Administrative burden for public administration: storage and delivery. • Targeted survey and interviews with national driving licence authorities • Targeted interviews with selected stakeholders	Based on the existing research and additional field research, the study team will assess the costs and administrative burden related to harmonisation of driving licence rules, in particular as regards age limits, driving licence validity periods and exceptions, as perceived by national authorities and other stakeholders.
EQ 9.2.2: What have been the benefits and other types of impacts of the uniform driving licence rules and	EQ 9.2.2: Benefits and other types of impacts of the uniform driving licence rules and requirements (e.g.	• Road safety trends that can be correlated to the requirements of	• Reports and studies: e.g. European Commission (2017), Implementation study (e.g. Table 4.22 Overview of future measures for improvement in the area of road safety); Road Safety Atlas[325] and Annual Accident Report[326], based on Community database on	Based on the results from the desk and field research, the team will identify any benefits and other types of impacts of the uniform driving licence rules and requirements as

[325] https://ec.europa.eu/transport/road_safety/specialist/statistics_en

[326] https://ec.europa.eu/transport/road_safety/sites/roadsafety/files/pdf/statistics/dacota/asr2018.pdf

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
requirements (e.g. introduction of rules on age limits, driving licence validity periods and the exceptions)?	introduction of rules on age limits, driving licence validity periods and the exceptions)	the directive • Benefits of harmonising rules on age limits, validity periods and the related exceptions	Accidents on the Roads in Europe; European Commission (2019), Preliminary Road Safety Statistics[327]. • Databases: Eurostat (Transport Accident Statistics[328] and Transport Safety Statistics[329]); International Road Traffic Accident Database (IRTAD)[330]; ERF Statistics (2019)[331]; • TRID database[332] • Targeted survey with all stakeholder categories • Targeted interviews with selected stakeholder groups • Open Public Consultation • Reports and studies: e.g. European Commission (2017), Implementation study: in particular Table 4.15: Overview of the effects of administrative validity periods on administrative burden for	perceived by various stakeholders.

[327] https://ec.europa.eu/commission/news/road-safety-2019-apr-04_en

[328] https://ec.europa.eu/euros tat/statistics-explained/index.php?title=Archive:Transport_accident_statistics

[329] https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Category:Transport_safety

[330] https://stats.oecd.org/Index.aspx?DataSetCode=IRTAD_CASUAL_BY_AGE

[331] https://erf.be/statistics/safety-2019/

[332] Combines the records from TRB's Transportation Research Information Services (TRIS) Database and the OECD's Joint Transport Research Centre's International Transport Research Documentation (ITRD) Database.

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			citizens. • Targeted survey and interviews national driving licence authorities, driver's associations and drivers school associations, road safety and road users' associations / civil society and their members and road transport associations • Targeted interviews with selected stakeholders • Open Public Consultation	
EQ 9.3: Strengthening the principle of progressive access to category A driving licences?				
EQ 9.3.1: What have been the costs and burden for progressive access to category A driving licences?	EQ 9.3.1: Costs and burden for progressive access to category A driving licences	• Costs for citizens for first issuing, exchanging, replacing the category A driving licence via progressive access as compared to direct access	• Report and studies: e.g. European Commission (2017), Implementation study: Chapter 3.3 Modification of driving licence categories; Delhaye, A., Marot, L. (2015), A European Scanning Tour for Motorcycling Safety, Final Report of the EC/MOVE/C4 project RIDERSCAN: Chapter 2.2. Improving access to PTWs; Annex 2: User Survey – Feedback from European riders on the 3DLD implementation (Chapter 3.4. Opinion about the new licence scheme), Annex 4: Member States Amplifying Questions – EU Road Safety Authorities' views and recommendations, Annex 5: Motorcycling Community Amplifying Questions - Riders and Industry Safety Experts' views and recommendations, etc. • Targeted survey with national driving licence authorities and driver's associations and drivers school associations • Targeted interviews with selected stakeholders	The aim of this assessment is to conclude whether the introduction of progressive access to category A driving licences has incurred much higher costs as compared to costs for obtaining category A driving licences through direct access. Through additional indicators, the study team will also collect information how the provision on progressive access to category A driving licences affected the costs and administrative burden for national authorities and driving schools and instructors.

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Costs estimation for citizens for obligatory theoretical and practical course in professional driving school to obtain a driving licence	• Reports and studies, e.g. Delhaye, A., Marot, L. (2015), Training, testing and licencing, Deliverable 1 of the EC/MOVE/C4 project RIDERSCAN (Annex 2: User Survey – Feedback from European riders on the 3DLD implementation - Chapter 3.4. Opinion about the new licence scheme). • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholders • Open Public Consultation	
		• Administrative burden for national administrations to apply for the category A driving licence	• Reports and studies: e.g. European Commission (2017), Implementation study: Annex 5: Survey results regarding modification of driving licence categories. • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members, road transport associations • Targeted interviews with selected stakeholders • Open Public Consultation	

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Administrative burden for driving schools and instructors to extend the curricula of driving schools as linked to upgrading training, testing for category A driving licences	• Reports and studies: e.g. European Commission (2017), Implementation study: Annex 5: Survey results regarding modification of driving licence categories. • Targeted survey and interviews with driver's associations and drivers school associations	
EQ 9.3.2: What have been the benefits and other impacts of the introduction of progressive access to category A driving licences?	EQ 9.3.2: Benefits and other impacts of the introduction of progressive access to category A driving licences.	• Road safety trends (e.g. motorcycles involved in road fatalities and/or serious injuries)	• Findings and data sources under EQ1.1 on trends of road traffic accidents • Reports and studies: e.g. WHO (2018), Global status report on road safety; FEMA (2016), Motorcycle Safety and Accidents in Europe - a summary report.	Comparison of road safety data trends (road fatalities and/or serious injuries) for motorcycle road user category with the total road safety trends will allow us to assess how much provisions of the directive (in particular, the introduction of progressive access to category A driving licences) affecting motorcycle riders have contributed to improved road safety trends. The approach is further described in chapter 5.4.
		• Trends in progressive access compared to direct access to category A driving licences	• Reports and studies: e.g. Delhaye, A., Marot, L. (2015), A European Scanning Tour for Motorcycling Safety, Final Report of the EC/MOVE/C4 project RIDERSCAN: Chapter 2.2. Improving access to PTWs; ACEM Industry Report (2015), Chapter 4: The economics of the motorcycle sector and ACEM statistical release. • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road transport associations • Targeted interviews with selected stakeholders	Based on the desk and field research, the study team will identify the number of EU citizens opting for progressive access as compared to a direct access to category A driving licences (to the extent that such data is available). The aim of the assessment is to identify whether progressive access is a popular choice for young and novice riders.

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			• Open Public Consultation	
		• Level of impact of the introduction of progressive access to category A driving licences on road safety of young and novice drivers	• Reports and studies: e.g. European Commission (2017), Study on driver training, testing and medical fitness: Chapter 5: Graduated access to higher motorcycle categories; Christie (2014), A Discussion Paper on Elements of Graduated Licensing Systems for Motorcycle Riders; ITF (2015), Improving Safety for Motorcycle, Scooter and Moped Riders: Chapter 5: Countermeasures addressing road user behaviour (sub-chapter: Licencing, Training and Education); Delhaye, A., Marot, L. (2015), A European Scanning Tour for Motorcycling Safety, Final Report of the EC/MOVE/C4 project RIDERSCAN. • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members, road transport associations, industry associations, insurance companies • Targeted interviews with selected stakeholders • Open Public Consultation	Based on the desk and field research, the study team will assess the trends of road safety for young and novice riders as compared to the general road safety trends in order to assess, whether the provisions of the directive affecting young and novice drivers have led to positive road safety trends.
		• Level of impact of the introduction of progressive access to category A driving licences on driver education and training curricula	• Reports and studies: e.g. Christie (2014), A Discussion Paper on Elements of Graduated Licensing Systems for Motorcycle Riders; European Commission (2017), Implementation study, Chapter: 3.3.2.2 Categories A1/A2/A, Annex 5: Chapter Graduated access from A1 to A2 and from A2 to A and Chapter Access from A1 to A; Annex 2: User Survey – Feedback from European riders on the 3DLD implementation.	Based on the desk and field research, the study team will assess the changes in training obligations due to the introduction of progressive access to category A.

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			• Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members, road transport associations • Targeted interviews with selected stakeholders • Open Public Consultation	
EQ 9.4: Establishing the EU driving licence network (RESPER)?				
EQ 9.4.1: What have been the costs of RESPER?	EQ 9.4.1: Costs of RESPER	• Costs of RESPER for the European Commission • Costs of RESPER for national authorities	• Targeted interviews with the European Commission • Reports and studies: e.g. European Commission (2016), Evaluation Study on the Application of directive 2011/82/EU Facilitating the Cross-Border Exchange of Information on Road Safety Related Traffic Offences • Targeted survey and interviews with national driving licence authorities	Based on the desk and field research, the study team will assess the costs of RESPER for national authorities (if any) and the EU institutions.
EQ 9.4.2: What have been the benefits and other impacts of RESPER?	EQ 9.4.2: Benefits and other impacts of RESPER	• Number of Member States connected to RESPER directly through national database or through EUCARIS	• Findings and data sources under EQ2.7 on number of Member States connected to RESPER	The aim of this assessment is to analyse all benefits and impacts of RESPER, including reduction of administrative burden for national authorities.

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
		• Change in the administrative burden for national authorities and citizens	• Reports and studies: e.g. European Commission (2017), Implementation study, Table 8.13: Overview of the effects of RESPER on administrative burden for citizens, Table 8.14: Overview of information that a citizens needs to provide besides the information accessed through RESPER, Table 8.15: Overview of the effects of RESPER on the costs for citizens, Table 8.15: Overview of the effects of RESPER on the costs for citizens. • Targeted survey and interviews with national driving licence authorities	This analysis will lead to a conclusion, whether RESPER brings more benefits than disadvantages and whether RESPER related costs are justified.
		• Level of information quality and reliability accessed through RESPER by national authorities	• Reports and studies: e.g. European Commission (2017), Implementation study, Table 7.7: Overview of how satisfied the Member States are with the SDLN service in RESPER, Table 7.10: Overview of how satisfied the Member States are with the GDLD service in RESPER, Table 7.13: Overview of how satisfied the Member States are with the NDLS service in RESPER, Table 7.16: Overview of how satisfied the Member States are with the secure messages service in RESPER.	
		• Change in number of fraud cases since the introduction of RESPER	• Reports and studies: e.g. European Commission (2017), Implementation study, Annex 8: Table 8.4: Overview of the effects of RESPER on driving licence fraud, Table 8.5: Overview of the effects of RESPER on driving licence fraud in specific situations • Targeted survey and interviews national driving licence authorities	
EQ 9.5: How do the above costs compare to the benefits (EQ 10.1 – EQ 10.4) established? Which stakeholder groups had to deal with which costs, and which benefitted from the rules?				

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
EQ 9.5.1: How do the costs of selected provisions of the directive (single model licence, uniform driving licences, progressive access, RESPER) compare to their benefits?	EQ 9.5.1: Comparison of costs and benefits of selected provisions of the directive (single model licence, uniform driving licences, progressive access, RESPER)	• Costs and benefit assessments including for specific stakeholder groups (from EQ 10.1 – EQ 10.4)	• Findings under EQ 9.1 – EQ 9.4	The costs associated with the implementation of the directive will be compared to the benefits.
EQ 10: Are there significant differences in costs between MSs and what is causing them?				
EQ 10.1: Differences in costs between Member States are significant.	EQ 10.1: Differences in costs of selected provisions of the directive (single model licence, uniform driving licences, progressive access, RESPER) between the Member States are significant.	• Costs per Member State	• Findings under EQ 9.1 – EQ 9.4	To the extent data is made available, the study will assess the differences in costs between Member States identified under EQ 9.1 – EQ 9.4 and make a conclusion on causes of cost differences. The latter conclusion will be based on the results of planned consultation activities.
EQ 10.2: What have been the causes of the significant cost differences across the Member States?	EQ 10.2: Causes of the significant cost differences of selected provisions of the directive (single model licence, uniform driving licences, progressive access, RESPER) across the Member States	• Causes of costs for different cost categories (types of costs, as defined in EQ11.1)	• Targeted survey and interviews with national driving licence authorities, drivers' associations and drivers school associations • Targeted survey and interviews national driving licence authorities	
EQ11: Is there a potential for simplification and reduction of regulatory burden caused by the directive, for instance through further digitalisation or better exploiting potential synergies with other travel documents within the Schengen area?				

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
EQ11.1: Has the directive led to any unnecessary complexities and regulatory burden?	EQ11.1: Unnecessary complexities and regulatory burden caused by the directive	• Processes, procedures, activities linked to the directive's objectives that impose unnecessary complexities for different stakeholder groups (e.g. renewing driving licence procedures, time and required documentation for requesting a driving licence, medical checks, administrative validity periods, etc.)	• Findings from other criteria, particularly in terms of effectiveness of the directive (See EQ 2.1 on administrative burden) and in terms of relevance of the directive (See EQ 12-15) • Reports and studies: e.g. European Commission (2017), Implementation study. • Targeted survey and interviews with national driving licence authorities, drivers' associations and drivers school associations, road safety and road users' associations / civil society and their members • Open Public Consultation	Based on the desk and particularly field research as well as a Case study on Digital Driving Licence, the study team will assess whether there is a potential for simplification and reduction of regulatory burden caused by the directive, for instance through further digitalisation or better exploiting potential synergies with other travel documents within the Schengen area.
EQ 11.2: Which are the opportunities for simplification of the directive and reduction of the regulatory burden?	EQ 11.2: Opportunities for simplification of the directive and reduction of the regulatory burden	• Identified opportunities to simplify and reduce the costs in relation to (administrative) processes and procedures by means of digitisation	• Findings under EQ9: Has the directive resulted in any excessive costs/negative impacts findings from other criteria, particularly in terms of effectiveness of the directive (See EQ2.1 on administrative burden) and in terms of relevance of the directive (See EQ12-15) • Reports and studies: e.g. European Commission (2017), Implementation study: 3.1.2.6 Administrative burden for public administration: storage and delivery and Table 3.4: Data storage and transfer before & after implementation of the third driving licence directive; EReg (2016), Improving Registration & Licencing Services through Digital Service Channels - Final Report. • Case study on Digital Driving Licence • Targeted survey and interviews with national driving licence authorities, drivers' associations and drivers school associations, road	

Sub-question	Assessment / Judgement criteria	Indicators	Data sources	Analytical approach
			safety and road users' associations / civil society and their members • Open public consultation	
EQ 11.3: Are there opportunities for simplification of the directive and reduction of the regulatory burden by means of enhancing synergies with other travel documents within the Schengen area?	EQ 11.3: Opportunities for simplification of the directive and reduction of the regulatory burden by means of enhancing synergies with other travel documents within the Schengen area	• Identified opportunities to simplify and reduce the costs in relation to (administrative) processes and procedures by means of enhancing synergies with other travel documents within the Schengen area	• Findings under EQ9: Has the directive resulted in any excessive costs/negative impacts findings from other criteria, particularly in terms of effectiveness of the directive (See EQ2.1 on administrative burden) and in terms of relevance of the directive (See EQ12-15) • Reports and studies: e.g. Implementation study (2017): 3.1.3.3 Acceptance of driving licences as ID document. • Targeted survey and interviews with national driving licence authorities, drivers' associations and driving school associations, road safety and road users' associations / civil society and their members. • Open Public Consultation	

Relevance

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
EQ 12: Do the objectives incorporated in the directive match the needs of today and the foreseeable future?				
EQ 12.1: Do the objectives of the directive address the current and future most significant needs in terms of legal considerations?	EQ 12.1: The objectives of the directive address the current and future most significant needs in terms of legal considerations.	• Level of alignment/mismatch between the objectives of the directive and the current and foreseen most significant needs in terms of legal considerations (e.g. the concept of normal residence, digital driving licence, driving licence as proof of identity)) • Extent to which current and arising legal challenges are addressed by the directive (e.g. in terms of technological advances, e.g. driverless vehicles, ride sharing, cooperative intelligent transport systems, eco-driving requirements, etc.) • Level of flexibility of the directive to address the future identified needs	• Reports, studies, relevant legislation: e.g. European Commission (2017), Implementation study (conclusions and recommendations); CIPTEC (September 2018), D1.1: Report on major market trends, the effect of societal trends on market and their influence on public transport (Chapter 7: Legal changes); Joint Research Centre (2019), The future of road transport - Implications of automated, connected, low-carbon and shared mobility. • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups • Open public consultation • Case study 2 - Digital driving licence and Case study 3 - Accompanied driving	The assessment will rely on a qualitative analysis of the current and future most significant needs and the extent to which they are addressed by the current provisions of the directive. This will be done both on the basis of desk research which will be triangulated with assessments made by stakeholders in the field research.

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
EQ 12.2: Do the objectives of the directive address the current and foreseen most significant needs in terms of social developments?	EQ 12.2: The objectives of the directive address the current and foreseen most significant needs in terms of social developments.	• Level of alignment/mismatch between the objectives of the directive and the current and foreseen most significant needs in terms of social advances (e.g. progressive access to categories, ageing population) • Level of flexibility of the directive to address social needs (e.g. socially inclusive mobility)	• Reports, studies, relevant legislation: e.g. European Commission (2017), Implementation study (chapter 3.2.2.5 Medical checks upon renewal information related to ageing population); CIPTEC (2018), D1.1: Report on major market trends, the effect of societal trends on market and their influence on public transport (chapter 4: Social Changes); Institute of Transport Economics Norwegian Centre for Transport Research (2019), How will social trends impact transport?; European Commission (2017), Study on driver training, testing and medical fitness (chapter 3.5.1 age limits, chapter 8). • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups • Open public consultation • Case study 3 - Accompanied driving	

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
EQ 12.3: Do the objectives of the directive address the current and foreseen most significant needs in terms of adaptation to technical progress?	EQ 12.3: The objectives of the directive address the current and foreseen most significant needs in terms of adaptation to technical progress.	• Level of alignment/mismatch between the objectives of the directive and the current and foreseen most significant needs in terms of these technological advances (e.g. automatic transmission, active and passive safety features, alternative fuel vehicles, digital driving licence, automated driving, intelligent transport systems, clean transport technologies, car-sharing schemes, technology for motorcycles, including additional safety features ABS braking systems since 2016, etc.) • Level of flexibility of the directive to address the identified needs	• Reports, studies, relevant legislation: e.g. European Commission (2017), Implementation study (chapter 3.3.2.7 Electromobility and other forms of alternative propulsions); CIPTEC (2018), D1.1: Report on major market trends, the effect of societal trends on market and their influence on public transport (chapter 5: technological changes); Joint Research Centre (2019), The future of road transport - Implications of automated, connected, low-carbon and shared mobility; Joint Research Centre (2018), Electric vehicles in Europe from 2010 to 2017: is full-scale commercialisation beginning?; European Environmental Agency (2016), Electric vehicles in Europe; Zagorskas and Burinskiene (2019), Challenges Caused by Increased Use of E-Powered Personal Mobility Vehicles in European Cities. • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups • Open public consultation • Case study 2 - Digital driving licence and Case study 3 - Accompanied driving	
EQ 13: Are the minimum age limits established in the directive appropriate for current social needs?				

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
EQ 13.1: Do the minimum age limits in the directive address the current social needs of the Member States?	EQ 13.1: The minimum age limits in the directive address the current social needs of the Member States.	• Variations in age limits applicable across Member states • Level of alignment/ mismatch between the minimum age limits in the directive with social needs in different Member States and need for safe driving	• Reports, studies, relevant legislation: e.g. European Commission (2017), Implementation study (Table 5.2 comparison of minimum age for obtaining categories A1/A2/A before and after the implementation of the directive); European Commission (2017), Study on driver training, testing and medical fitness (conclusions and recommendations). • Findings under EQ12.3 on mapping on the most significant needs in terms of social developments (e.g. socially inclusive mobility) • Findings under EQ 9.2.2 on negative impact of the harmonisation of age limits, driving licence validity periods and the exceptions • Targeted interviews with selected stakeholder groups	The assessment will rely both on evidence on the age limits and the levels of road safety to try to assess whether the age limits are appropriate as well as stakeholders perceptions.
EQ 14: To what extent are all the types of existing or newly developed vehicles covered by the directive, given new mobility solutions such as micro mobility and electric bicycles and scooters? Are there significant differences among Member States or among age groups?				
EQ 14.1: To what extent are existing or newly developed vehicles covered by the directive?	EQ 14.1: Extent to which the existing or newly developed vehicles are covered by the directive.	• Practices in relation to road users of new mobility solutions in Member States (number of Member States that introduced new mobility solutions in legislation, requirements on age limitation)	• Reports, studies: Joint Research Centre (2019), The future of road transport - Implications of automated, connected, low-carbon and shared mobility; European Commission (2017), Implementation study (chapter 3.3.2.7 Electromobility and other forms of alternative propulsions); Zagorskas and Burinskiene (2019), Challenges Caused by Increased Use of E-Powered Personal Mobility Vehicles in European Cities.	The analytical approach will rely on a qualitative analysis of the extent to which the directive's provisions cover newly developed vehicles and/or the extent to which these are covered at the national level. This will be complemented with evidence from stakeholders' assessments of new mobility solutions that should be

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
			• Findings under EQ 12.4 on mapping of the current and foreseen most significant needs in terms of adaption to technical progress • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups • Open public consultation	covered by the directive.
		• Issues related to national legislation on new categories of vehicles in those Member States that introduced e-scooters, electric bicycles and other micro mobility solutions in their national legislation	• Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups • Open public consultation	
		• Level of flexibility of the directive to accommodate new road users such as electric bicycle and e-scooter riders	• Reports, studies: Joint Research Centre (2019), The future of road transport - Implications of automated, connected, low-carbon and shared mobility; European Commission (2017), Implementation study (chapter 3.3.2.7 Electromobility and other forms of alternative propulsions); Zagorskas and Burinskiene (2019), Challenges Caused by Increased Use of E-Powered	

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
			Personal Mobility Vehicles in European Cities. • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups • Open public consultation	
EQ 15: To what extent are the provisions on driving licence renewal adapted to demographic trends such as an ageing population?				
EQ 15.1: Are the provisions on driving licence renewal in the directive adapted to demographic trends?	EQ 15.1: Provisions on driving licence renewal in the directive are adapted to demographic trends.	• Trends in road traffic accidents according to age groups • Practices in Member States related to renewal of driving licences (e.g. frequency of driving licence renewal according to the age of the population, frequency of vision screening, medical questionnaire, traffic fatalities according to age group (above 65) / elderly road traffic fatalities)	• Findings under EQ 1.1 on trends of road traffic accidents • Reports, studies: e.g. European Commission, (2015), Older Drivers (report); Traffic Safety Basic Facts 2017[333]; European Commission (2017), Implementation Report (chapter 3.2.2.5 Medical checks upon renewal (information related to ageing population); European Commission (2017), Study on driver training, testing and medical fitness (chapter 3.5.1 Age limits) • Findings under EQ 12.3 on mapping on the most	This assessment will firstly provide quantifiable results on road safety trends for older generations. The approach is aligned with the baseline methodology. Based on the existing research and additional field research, the study team will map practices related to driving licence renewal procedures in different Member States in order to assess, whether relevant national legislations take into consideration demographic trends. These results

[333] https://ec.europa.eu/transport/road_safety/sites/roadsafety/files/pdf/statistics/dacota/bfs2017_main_figures.pdf

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
			significant needs in terms of social developments • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups • Open public consultation	will underpin the assessment of flexibility of the directive, as perceived by various stakeholders, to accommodate demographic trends at EU level.
		• Level of alignment of the provisions on driving licence renewal in the directive with demographic trends (e.g. age-based driver screening policies, requirements on medical assessment according to age groups, requirements on licence renewal according to age groups, methods used for the drivers' assessment and driver fitness) and needs	• Reports, studies: e.g. European Commission (2017), Implementation study (chapter 3.2.2.5 Medical checks upon renewal (information related to ageing population, chapter: Limited administrative validity periods for Group 1 and Group 2 drivers); European Commission (2017), Study on driver training, testing and medical fitness (chapter 3.5.1 age limits, chapter 8. Requirements on medical fitness to drive) • Findings under EQ 12.3 on mapping on the most significant needs in terms of social developments • Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups	

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
			• Open public consultation	
		• Level of flexibility of the directive's objectives to accommodate demographic trends in Member States	• Targeted survey with national driving licence authorities, drivers' associations and drivers school associations, road users' associations / civil society and their members, road transport associations and industry associations • Targeted interviews with selected stakeholder groups • Open public consultation	

Coherence

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
EQ 16: To what extent are the provisions of the directive coherent and consistent with one another? Are there any overlaps, contradictions or inconsistencies?				
EQ 16.1: Are the provisions set out in the directive internally consistent and coherent?	EQ 16.1: The provisions set out in the directive are internally consistent and coherent.	• Complementarities, overlaps and contradictions between the provision on the new model licence (Art. 1) and anti-forgery measures (Art. 2) • Complementarities, overlaps and contradictions between the provision on anti-forgery measures (Art. 2) with the functionalities of RESPER (Art. 15) • Complementarities, overlaps and contradictions between provisions with regards to driving skills (Annex IV) and provisions on mandatory medical checks (Art. 7) and with the provision on harmonisation of categories (Art. 14) • Complementarities, overlaps and contradictions between the provision on harmonisation of categories (Art. 14) and the provision on mandatory medical checks (Art. 7)	• Reports and studies: e.g. European Commission (2017), Implementation study: chapter 4.2.3 Harmonised administrative validity periods and medical checks and recommendations. • Other desk research: e.g. Feedback on the roadmap on Driving Licence rules (2019)[334] ; infringement procedures of the directive (e.g. published by the European Commission; collected through Task 4).	Based on the desk research, the study team will assess whether the provisions of the directive are coherent and consistent with one another and whether there are any overlaps, contradictions or inconsistencies. The approach to this assessment will rely on legal analysis of the provisions of the directive.
EQ 17: Are there any inconsistencies/gaps/overlaps between the directive and other legislation at international level which has similar objectives, and in particular with the relevant international obligations of the Member States?				

[334] https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2019-5226562_en.

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
EQ 17.1: To what extent are there inconsistencies, gaps or overlaps between the directive and other legislation?	EQ 17.1: There are no inconsistencies, gaps and overlaps between the directive and other legislation at international level with similar objectives.	• Inconsistencies, gaps and overlaps between the directive and international interventions with similar objectives related to: - **Road safety:** e.g. with the International UNECE Transport Agreements and Conventions on road traffic[335], legal instruments related to road transport and border crossing facilitation - **Free movement:** e.g. with the UNECE border crossing facilitation[336], Geneva Convention on Road Traffic (1949)[337], Vienna Convention on Road Traffic (1968)[338] and its 2006 amendments[339] - **Fraud:** e.g. with the Geneva Convention on Road Traffic (1949)[340], and the 1971 European Agreement Supplementing the Convention (Road Traffic)[341], Vienna	• Findings from other evaluation questions on effectiveness (e.g. EQ1, EQ2.1, EQ2.3, EQ3, EQ7) • Legislation: policies and legislation at the international level with similar objectives as Directive 2006/126/EC and identify the objectives of these selected policies and legislation. • Studies by other organisations such as FIA[348] and the UNECE[349]). • Targeted survey and interviews with national competent authorities and members from UNECE	Comparative analysis of the provisions of the directive and other legislation based on desk research and assessments by stakeholders. The team is aware that the international obligations are much narrower in scope compared to the driving licence directive, therefore only any possible contradictions or overlaps will be assessed in the analysis.

335 The UN Economic Commission for Europe (UNECE) guides the process of harmonizing and simplifying border crossing procedures for the various modes of inland transport and provides an overview of international UNECE Transport Agreements on its website http://www.unece.org/trans/conventn/legalinst.html

336 https://www.unece.org/trans/international-agreements/transconventnlegalinst/list-of-agreements-for-tabs/border-crossing-facilitation-agreements-and-conventions.html

337 https://treaties.un.org/pages/ViewDetailsV.aspx?src=TREATY&mtdsg_no=XI-B-1&chapter=11&Temp=mtdsg5&clang=_en

338 https://treaties.un.org/Pages/ViewDetailsIII.aspx?src=TREATY&mtdsg_no=XI-B-19&chapter=11

339 https://www.unece.org/fileadmin/DAM/trans/conventn/Conv_road_traffic_EN.pdf

340 https://treaties.un.org/pages/ViewDetailsV.aspx?src=TREATY&mtdsg_no=XI-B-1&chapter=11&Temp=mtdsg5&clang=_en

341 https://treaties.un.org/doc/Publication/UNTS/Volume%201731/volume-1731-A-17847-English.pdf

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
		Convention on Road Traffic (1968)[342] and its 2006 amendments[343] - **Testing and training of drivers and examiners:** e.g. with the Geneva Convention on Road Traffic (1949)[344], and the 1971 European Agreement Supplementing the Convention (Road Traffic)[345], Vienna Convention on Road Traffic (1968)[346] and its 2006 amendments[347] • Identified mechanisms to ensure exchanges and synergies between the directive and the identified legislation at the international level	• Open Public Consultation	
EQ 17.2: Are there any inconsistencies, gaps and overlaps between the directive and relevant	EQ 17.2: There are no inconsistencies, gaps and overlaps between the directive and relevant international obligations of	• Inconsistencies, gaps, overlaps of the directive with key international obligations of the EU27 Member States, aligned with the objectives	• Findings from other evaluation questions on effectiveness (e.g. EQ1,	

[348] FIA (2017), Proposed amendment relating to driving permits in the 1968 road traffic convention, https://www.unece.org/fileadmin/DAM/trans/doc/2017/wp1/ECE-TRANS-WP1-2017-March-Presentation-3e.pdf

[349] United Nations, Main United Nations Road Transport Agreements, https://sustainabledevelopment.un.org/content/documents/1761Main%20UN%20Road%20Transport%20Agreements.pdf

[342] https://treaties.un.org/Pages/ViewDetailsIII.aspx?src=TREATY&mtdsg_no=XI-B-19&chapter=11

[343] https://www.unece.org/fileadmin/DAM/trans/conventn/Conv_road_traffic_EN.pdf

[344] https://treaties.un.org/pages/ViewDetailsV.aspx?src=TREATY&mtdsg_no=XI-B-1&chapter=11&Temp=mtdsg5&clang=_en

[345] https://treaties.un.org/doc/Publication/UNTS/Volume%201731/volume-1731-A-17847-English.pdf

[346] https://treaties.un.org/Pages/ViewDetailsIII.aspx?src=TREATY&mtdsg_no=XI-B-19&chapter=11

[347] https://www.unece.org/fileadmin/DAM/trans/conventn/Conv_road_traffic_EN.pdf

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
international obligations of the Member States?	the Member States	regarding road safety, free movement, fraud, and drivers' training and education, i.e. with the Geneva Convention on Road Traffic (1949)[350] and the 1971 European Agreement Supplementing the Convention (Road Traffic)[351], Vienna Convention on Road Traffic (1968)[352] and its 2006 amendments[353] • Identified mechanisms to ensure exchanges and synergies between the directive and relevant international obligations of the Member States	EQ2.1, EQ2.3, EQ3, EQ7, EQ17.1) • Other desk research: e.g. international legislation and international obligations of the Member States. • Targeted survey and interviews with national competent authorities. • Open Public Consultation	
EQ 18: To what extent is the directive coherent with: EQ 18.1: other EU legislation in the area of road safety, and in particular with regards to their scope of application				
EQ 18.1: Is the directive designed in a way to support the objectives and minimise overlaps / ensure synergies	EQ 18.1: The directive is designed in a way to support the objectives and minimise overlaps / ensure synergies	• Level of synergies between the directive (objectives, provisions and scope of application) and directive 2015/413 on cross-	• Findings from other evaluation questions on effectiveness (e.g. EQ1, EQ2.1, EQ2.3, EQ3, EQ7) on the	Comparative analysis of the provisions of the directive with other relevant legislation based on desk research and

350 https://treaties.un.org/pages/ViewDetailsV.aspx?src=TREATY&mtdsg_no=XI-B-1&chapter=11&Temp=mtdsg5&clang=_en

351 https://treaties.un.org/doc/Publication/UNTS/Volume%201731/volume-1731-A-17847-English.pdf

352 https://treaties.un.org/Pages/ViewDetailsIII.aspx?src=TREATY&mtdsg_no=XI-B-19&chapter=11

353 https://www.unece.org/fileadmin/DAM/trans/conventn/Conv_road_traffic_EN.pdf

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
with other EU legislation in the area of road safety?	with other EU legislation in the area of road safety	border exchange of information on road-safety related traffic offenses[354] • Level of synergies between the directive (objectives, provisions and scope of application) and directive 2003/59/EC on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers[357] • Level of consistency of the minimum age requirement in Directive 2003/59/EC on training of professional drivers and Directive 2006/126/EC • Stakeholders perceptions on synergies/ overlaps and coherence of the directive with a sample of another EU legislation	extent to which issues are detected regarding the implementation of the directive, and whether these have a connection to requirements in the key EU legislation in the area of road safety • Other desk research: e.g. Directive 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences[355], Directive 2003/59/EC and Directive 2006/126/EC; Feedback on the roadmap on Driving Licence rules (2019)[356]. • Targeted survey and interviews with Member State authorities, road safety and road users' associations. • Targeted survey and interviews with Member State authorities and road safety and road users' associations	stakeholders' assessments.

354 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32015L0413

355 European Commission, EU Road Safety Policy, https://ec.europa.eu/transport/road_safety/specialist/policy_en

356 https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2019-5226562_en.

357 https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32003L0059

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
			• Open Public Consultation	
EQ 18.2: Other EU transport legislation, in particular in the areas of automated driving and digitalisation policies? Are there any overlaps, gaps or inconsistencies? Are there any complementarities/synergies?				
EQ 18.2: Is the directive designed in a way to support the objectives and minimise overlap / ensure synergies with other EU transport legislation, particularly in the areas of automated driving and digitalisation policies?	EQ 18.2: The directive is designed in a way to support the objectives and minimise overlap / ensure synergies with other EU transport legislation, particularly in the areas of automated driving and digitalisation policies	• Synergies between the directive (objectives, provisions and scope of application) and the Cooperative, connected and automated mobility initiative (CCAM)[358] in the framework of the European Strategy on Cooperative Intelligent Transport Systems (C-ITS) • Level of synergies between the directive (objectives, provisions and scope of application) and the Digital Transport policy and framework[360]	• Findings from other evaluation questions on effectiveness (e.g. EQ1, EQ2.1, EQ2.3, EQ3, EQ7) on the extent to which issues are detected regarding the implementation of the directive, and whether these have a connection to requirements in the key other EU transport legislation • Other desk research: e.g. EU transport legislation and initiatives; Feedback on the roadmap on Driving Licence rules (2019)[359].	Comparative analysis of the provisions of the directive with other EU transport legislation, in particular in the areas of automated driving and digitalisation policies based on desk research and stakeholders' assessments.

[358] https://ec.europa.eu/transport/themes/its/c-its_en

[359] https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2019-5226562_en.

[360] https://www.consilium.europa.eu/en/press/press-releases/2017/12/05/digitalisation-of-transport-council-conclusions/

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
		• Stakeholders perceptions on synergies /overlaps and coherence of the directive with the sample of other EU transport legislation	• Targeted survey and interviews with Member State authorities, road safety and road users' associations and industry associations • Open Public Consultation	
EQ 18.3: Other EU legislation such as motor vehicle type-approval legislation, the Digital Single Market and e-Government initiatives in relation to digitalisation?				
EQ 18.3: Is the directive designed in a way to support the objectives and minimise overlap / ensure synergies with other EU legislation related to motor vehicle type-approval legislation, the Digital Single Market and e-Government initiatives in relation to digitalisation?	EQ 18.3: The directive is designed to support the objectives and minimise overlap / ensure synergies with EU legislation related to motor vehicle type-approval, the Digital Single Market and e-Government initiatives in relation to digitalisation	• Level of synergies between the directive (objectives, provisions and scope of application) and the Regulation (EU) 2018/858 of the European Parliament and of the Council of 30 May 2018 on the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles361 • Level of synergies between the directive (objectives, provisions and scope of application) and the Regulation 167/2013 on the type-approval of tractors and Regulation 168/2013 on the type-approval of motorcycles	• Findings from other evaluation questions on effectiveness (e.g. EQ1, EQ2.1, EQ2.3, EQ3, EQ7) on the extent to which issues are detected regarding the implementation of the directive, and whether these have a connection to requirements in the key other EU legislation • Other desk research: e.g. EU legislation related to e-Government initiatives and in relation to digitalisation; • Feedback on the roadmap on Driving	Comparative analysis of the provisions of the directive with other EU legislation, such as motor vehicle type-approval legislation, based on desk research and stakeholders' assessments.

[361] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R0858

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
		• Level of synergies between the directive (objectives, provisions and scope of application) the Digital Single Market • Level of synergies between the directive (objectives, provisions and scope of application) and e-Government initiatives in relation to digitalisation	Licence rules (2019)[362]. • Targeted surveys and interviews with Member State authorities (to retrieve examples of e-Government initiatives in relation to digitalisation) •	
EQ 19: What are the impacts of the observed internal/external inconsistencies/gaps/overlaps of the effectiveness?				
EQ 19.1: Have the observed inconsistencies/gaps/overlaps any negative impacts on the effectiveness of the directive?	EQ 19.1: The observed inconsistencies/gaps/overlaps have some/no negative impacts on the effectiveness of the directive	• Level of impact of the identified inconsistencies, gaps and/or overlaps as part of EQ 16, EQ 17 and EQ 18 on the effectiveness of the directive in achieving the objectives • Stakeholders' views and perception on the level of impact on the effectiveness of the directive	• Findings from the other evaluation questions on coherence (e.g. EQ16 – EQ18) • Other desk research: e.g. selected EU legislation (mapping with scope of application). • Targeted survey and interviews with selected stakeholders.	• Based on desk and especially field research, the study team will assess whether observed internal/external inconsistencies/gaps/overlaps have an impact on the effectiveness of the driving licence directive, as perceived by various stakeholders. Qualitative assessment of the types of impacts that gaps and overlaps between the directive and other

[362] https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2019-5226562_en.

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
			• Open Public Consultation	legislation have.

EU added value

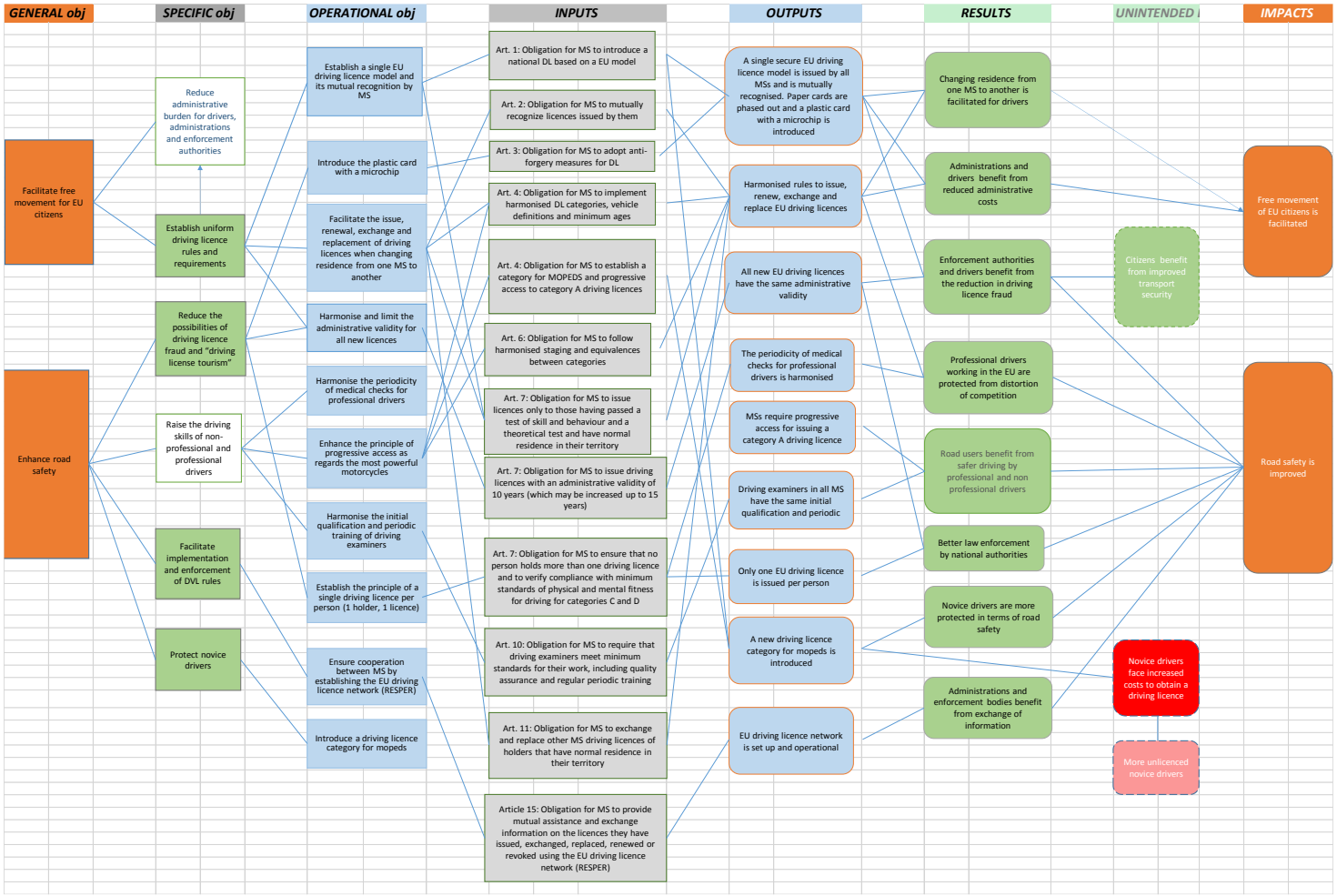
Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
EQ 20: What are the benefits of intervening at EU level, over and above what could have been reasonably expected from MSs acting individually at regional, national or international level (notably through the UNECE structure)?				
EQ 20.1: Has the directive brought benefits beyond what the Member States could achieve acting individually at national, regional and international level?	EQ 20.1: The directive has brought benefits beyond what the Member States could achieve acting individually at national, regional and international level.	• Benefits achieved through the intervention at the EU level in the fields of road safety, free movement, fraud, driving skills and education, protection of (novice) drivers and others • Benefits achieved at Member States level by having acted individually through the UNECE at the national, regional and/or international level • Perception from Member States regarding whether (and where feasible, how much) the (hypothetical) absence of the directive could have affected road	• Findings from the effectiveness, efficiency and relevance criteria • Other desk research: e.g. UNECE database, national legislation and policies, etc. • Targeted survey and interviews with national driving licence authorities (national competent authorities), drivers associations and drivers school associations and road safety, road users' associations / civil society and their members and road transport associations	The findings on the extent to which the directive has reached its objectives in terms of road safety and free movement of persons will used to support the added value of the directive as compared to a scenario where no directive would have been adopted. This will be complemented with assessments by stakeholders from the field research on the benefits of the directive.

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
		safety in their countries • Rating of the added value of the key provisions of the directive (by stakeholders and by evaluators)/ stakeholder assessment of the benefits • Identified changes in the national processes, policies and/or initiatives due to synergies achieved through the directive	• Open Public Consultation	
EQ 21: How much actual value has been created, and what evidence is there in terms of order of magnitude of this added value?				
EQ 21.1: How much of the added value has been created through the implementation of the directive?	EQ 21.1: Extent of the added value created through the implementation of the directive	• Level of contribution of the directive to free movement EU citizens as measured through effectiveness and efficiency questions and indicators, e.g. administrative burden and changed processes for renewing driving licence, harmonisation of the validity periods and the uniformed rules and requirements in costs for renewing driving licence	• Findings from the effectiveness, efficiency and relevance criteria • Reports and studies: e.g. European Commission (2017), Implementation study: Table 4.8 overview of the effects of administrative validity periods on freedom of movement, table 4.20 overview of future measures for improvement in the area of freedom of movement. • Case study 1 - Methodology for establishing a causal link between the directive and its effects on road safety and free movement of	The assessment will rely on evidence concerning the contribution of the directive to road safety and free movement of persons (i.e. dimensions of added value that can be quantified). This will be complemented with evidence from stakeholders assessments.

Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
			citizens/drivers and quantifying them • Targeted survey and interviews with national authorities, drivers' associations and drivers school associations, civil society and their members	
		• Level of contribution of the directive to road safety as measured through effectiveness and efficiency questions and indicators, e.g. trends in road traffic accidents, trends in instances of forgery / fraud, trends on the measures and harmonised rules related to drivers' education, driving examiners rules and medical checks	• Findings from the effectiveness, efficiency and relevance criteria • Reports and studies: e.g. European Commission (2017), Implementation study: Table 4.22 overview of future measures for improvement in the area of road safety. • Targeted survey and interviews with national authorities, drivers' associations and drivers school associations and Road safety and road users' associations • Case study 1 - Methodology for establishing a causal link between the directive and its effects on road safety and free movement of citizens/drivers and quantifying them	
		• Number of instances of driving licence fraud and driving licence tourism	• Findings and data sources under EQ1.1 on trends in instances of driving licence fraud and driving licence tourism	
EQ 22: Would it have been possible to have the same results without the directive?				
EQ 22.1: To what extent the same results	EQ 22.1: Extent to which the same results could have been	• Identified results achieved by the directive (i.e. for road safety, free	• Findings from the effectiveness, efficiency and relevance criteria	As described above, this assessment will rely on evidence from effectiveness and efficiency

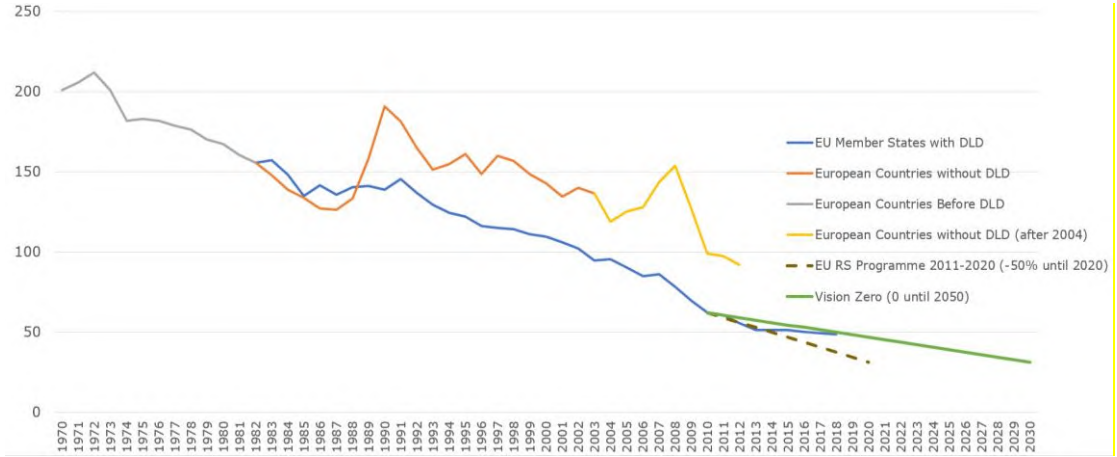
Sub-question	Assessment /Judgement criteria	Indicators	Data sources	Analytical approach
could have been achieved without the directive?	achieved without the directive	movement of persons and forgery / fraud) at the national level	• Targeted survey and interviews with national authorities, drivers' associations and drivers school associations and Road safety and road users' associations	criteria which will be complemented with stakeholder's assessments from the field research.
		• Perception by stakeholders on whether (and maybe how much) the (hypothetical) absence of the directive would have affected road safety in their countries	• Targeted survey and interviews with national authorities, EU institutions (DG MOVE), road safety and road users' associations, road transport association, industry associations and the UNECE (selection of members)	
		• Perception by stakeholders on how the driving licence procedures would have progressed in their Member State (and beyond) without the directive	• Open Public Consultation	
		• Level of inconsistencies between Member States' policies before the implementation of the directive	• Targeted survey and interviews with national authorities, EU institutions (DG MOVE), road safety and road users' associations, road transport association, industry associations and the UNECE (selection of members)	
			• Open Public Consultation	

Annex 4: Intervention logic



Annex 5: Tables and graphics

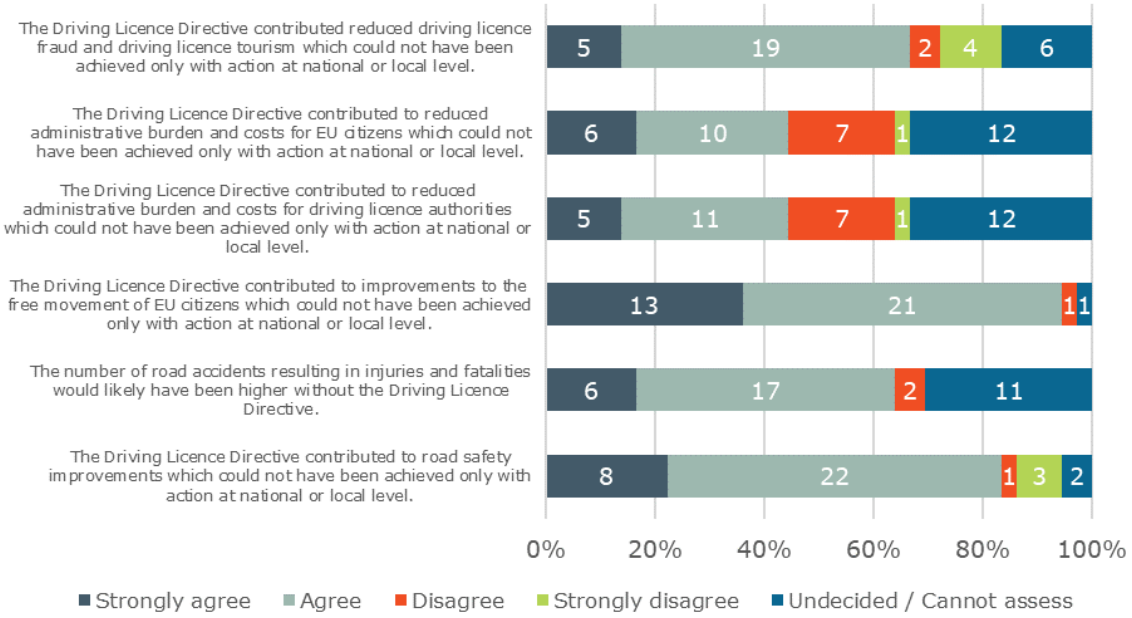
Figure 1 Comparison of road accident fatalities per million population compared to targets (road accident fatalities per million population) [363]



Source: evaluation support study based on CARE Data, CADaS Data, extracted 2020

[363] European countries before 1983, 10 MS and 18 non-MS from 1983-1985, 12 MS and 16 non-MS from 1986-1994, 15 MS and 13 non-MS from 1995-2003, 25 MS and 3 non-MS from 2004-2006, 27 MS and 1 non-MS from 2007-2012, 28 MS from 2014-2018.

Figure 2 Responses to the question "Question To what extent do you agree with the following statements concerning the added value of the directive?"



Source: Survey with non-governmental stakeholders.

Table 1 Objectives, tools/measures and legal obligations imposed by the directive

General objectives	Specific Objectives	Tools/measure	Legal Provision
Facilitate free movement	**Reduce administrative burden for drivers, administrations and enforcement authorities**	To establish a single EU driving licence model and its mutual recognition by Member States	Art. 1: Obligation to introduce a national driving licence based on a Community Model
		To introduce the plastic card with a microchip	Art. 3: Obligation to adopt anti-forgery measures for driving licences
	Establish uniform rules and requirements	To facilitate the issue, renewal, exchange and replacement of driving licences when changing residence from one Member State to another	Art. 2: Obligation to mutually recognise driving licences issued by the Member States
			Art. 4: Obligation to implement harmonised driving licence categories, vehicle definitions and minimum ages
			Art. 4: Obligation to establish a category for MOPEDS and progressive access to category A driving licences
			Art. 11: Obligation to exchange and replace other Member States' driving licences of holders that have normal residence in their territory
			Art. 7: Obligation to issue driving licences only to those having passed a test of skill and behaviour and a theoretical test and have normal residence in their territory
		To harmonise and limit the administrative validity for all new licences	Art. 7: Obligation to issue driving licences with an administrative validity of 10 years (which may be increased up to 15 years)

Enhance road safety	**To reduce the possibilities of driving licence fraud and "driving licence tourism"**	To establish the principle of a single driving licence per person (1 holder, 1 licence)	Art. 7: no person holds more than one driving licence, and a requirement to verify the compliance with minimum standards of physical and mental fitness for driving categories C.
	To raise the driving skills of non-professional and professional drivers	To harmonise the periodicity of medical checks for professional drivers	Art.7 (3) Obligation of continuing compliance with the standards on medical fitness for professional drivers
		To harmonise the initial qualification and periodic training of driving examiners	Art. 4: Obligation to establish a category for MOPEDS and progressive access to category A driving licences
			Art. 10: Obligation to require that driving examiners meet minimum standards for their work, including quality assurance and regular periodic training
		To enhance the principle of progressive access to more powerful motorbikes	Art.6 : Obligation to follow harmonised staging categories and equivalences between categories Art. 7 (1) (c) Obligation of Minimum 2 years' experience on the lower category
	To facilitate the implementation and enforcement of driving licence rules	To foster cooperation between Member States by establishing the EU driving licence network (RESPER)	Article 15: Obligation to provide mutual assistance and exchange information on the licences they have issued, exchanged, replaced, renewed or revoked using the EU driving licence network (RESPER)
	To protect novice drivers	Introduce a driving licence category for mopeds	Art. 4: Obligation to establish a category for MOPEDS and progressive access to category A driving licences

Table 2 Methodology Structure

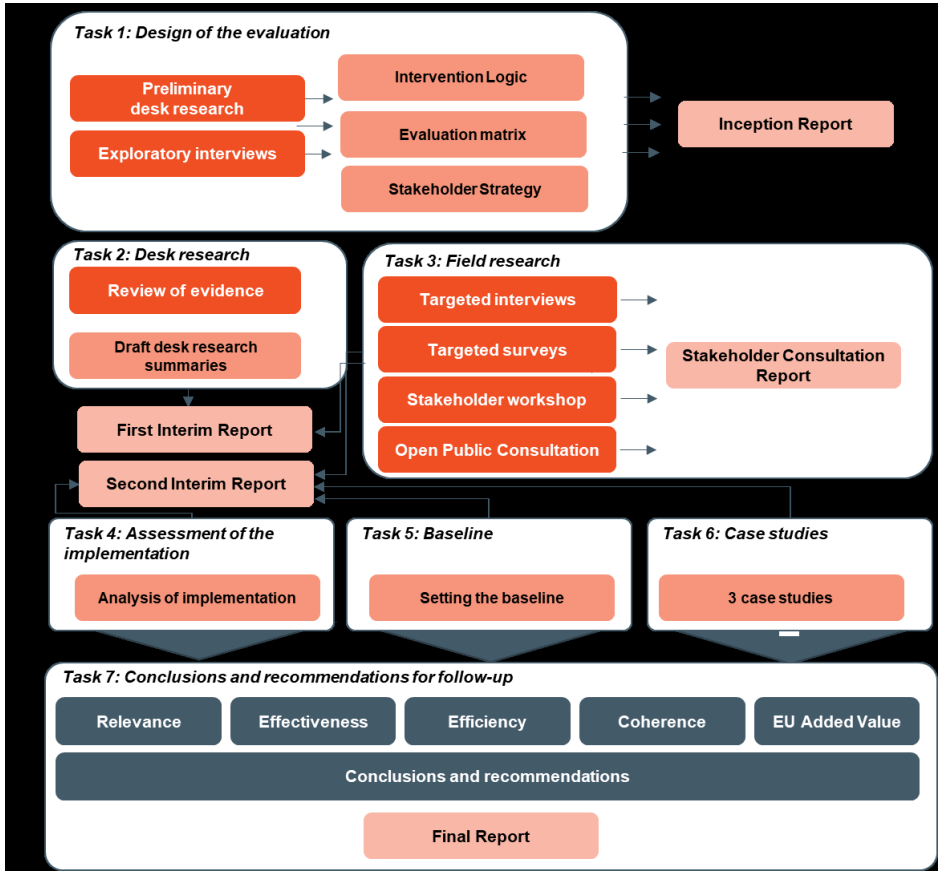


Figure 2 Support Study Methodology Structure

Table 3 Validity periods

Table Administrative validity periods for A-B driving licence categories

Category	10 years	15 years
AM, A1, A2, A	Belgium, Bulgaria, Croatia, Czechia , Estonia, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Portugal, Romania, Slovenia, Spain, Sweden, United Kingdom	Austria, Cyprus, Germany, Denmark, Finland, France, Greece, Iceland, Norway, Poland, Slovakia
B, B1, BE	Belgium, Bulgaria, Croatia, Czechia , Estonia, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, the Netherlands, Portugal, Romania, Slovenia, Spain, Sweden, United Kingdom	Austria, Cyprus, Germany, Denmark, Finland, France, Greece, Iceland, Norway, Poland, Slovakia

Source: Based on the results from the targeted survey with national authorities and European Commission (2017), The implementation of Directive 2006/126/EC on driving licences. Re-port drafted by Hasselt University, NTUA.

Shorter administrative validity periods and limitations for novice drivers are applied in several Member States. For categories A and B licences, as presented in Table 0-1 below, 7 Member States apply either shorter validity periods or probation/trial periods. The limited validity period is usually 2-3 years. Some countries have a two-phased driving licencing procedure. In Luxembourg, the candidates for licences A2 and B have to undergo additional training before obtaining a permanent licence. For categories C and D, exceptions and limitations for novice drivers are much more rarely imposed, as only in Norway and Ireland, there is a probational period or limited validity period for novice professional drivers which is less than the usual 5 years.

In some countries, there are stricter rules applied to novice drivers. According to the national authorities in Austria, Bulgaria, Greece, Norway, Slovenia, Sweden and Belgium, novice drivers are automatically subject to stricter rules (e.g. in terms of penal measures, demerit points, alcohol limit, additional training). For example, Belgium applies stricter penal measures for certain traffic violations for novice drivers. Norway also applies stricter penalties for traffic offences. Slovenia applies stricter rules including a lower maximum number of penalty points, additional safety training, zero alcohol policy. Bulgaria applies the same limitations for novice drivers as for other drivers, but the maximum number of penalty points is lower for novice drivers.

Table 0-1Shorter administrative validity periods for driving licences and other limitations concerning administrative validity periods when it comes to novice drivers

Exemptions	Countries
Shorter administrative validity period for category AM, A1, A2, B, B1, B	• France (3 years) • Iceland (3 years for B category) • Ireland (2 years) • Lithuania (2-3 years) • Luxembourg (2 years for categories A2 and B) • Norway (2 years of probation period) • Slovenia (2 years or until the age of 21 years)
Shorter administrative validity period for category C, CE, C1, C1E, D, DE, D1, D1E	• Ireland (2 years) • Norway (probation period)
Shorter administrative validity period first licence issued for categories C and D	• Ireland (2 years) • Norway (probation period)
Other	• Austria (stricter rules) • Belgium (stricter penal measures for certain traffic violations) • Germany (2 years' probation period) • Netherlands (5 years for first issue of categories A and B) • Sweden (trial period of 2 years)

Source: Survey with national authorities.

Concerning the limited administrative validity periods for drivers above 50 years, several national authorities impose exemptions or limitations. As presented below, 8 Member States and Norway apply shorter administrative validity periods for older drivers for categories A and B, whereas 6 Member states and Norway apply shorter administrative validity periods for category C and D. Furthermore, 13 Member States and Norway apply increased frequency of medical checks whereas 1 country requires refresher courses.

Table 0-2 Are there any exceptions or limitations in your country concerning administrative validity periods when it comes to drivers above 50 years?

Shorter administrative validity period for category AM, A1, A2, B, B1, BE	Shorter administrative validity period for category C, CE, C1, C1E, D, DE, D1, D1E	Increased frequency of medical checks	Refresher courses	Other measures	No additional exceptions/ limitations
• Finland • Greece • Hungary • Ireland • Italy[364] • Luxembourg • Netherlands • Norway • Slovenia	• Austria • Finland • Ireland • Norway • Hungary • Greece • Poland • Slovenia	• Austria • Belgium • Czechia • Finland • Estonia • Greece • Hungary • Ireland • Latvia • Lithuania • Luxembourg • Netherlands • Norway • Slovenia	• Slovenia	• Germany • Slovenia	• Croatia • Cyprus • Denmark • France • Iceland • (Italy[365]) • Romania • Slovakia • Slovenia • Spain • Sweden

Source: Survey with national authorities.

[364] The Italian national authority did not specify under this question, whether there is a shorter validity period for categories A-B, however, it indicated so under one of its previous responses to the question ('What is the current administrative validity period in your country for A and B driving licence categories?'). According to its reply, Italy has a different administrative validity period of categories A and B driving licences for older drivers. From the age of 70 years, the validity period is reduced to 3 years and from the age of 80 it is reduced to 2 years.

[365] Under another question, the Italian national authority indicated that the validity period for categories A-B is reduced to 3 years from the age of 70 years and from the age of 80 it is reduced to 2 years.

The conditions for renewing driving licences after expiry of administrative validity vary across Member States. As presented below, 7 Member States apply the examination of minimum standards for physical and mental training for renewal of driving licences, whereas other Member States apply other requirements ranging from renewed photos, medical examination, self-declaration of physical fitness or re-testing.

Table 0-3 Requirements and conditions for renewal of driving licences when the administrative validity period expires

Examination of minimum standards for physical and mental training for renewal of category AM, A1, A2, B, B1, BE licences	Other
• Bulgaria • Estonia • Greece • Hungary • Lithuania • Poland • Spain	• Belgium (declaration for fitness for Group 1) • Croatia (medical examination) • Cyprus (renewed photo) • Czech Rep. (no requirement)) • Denmark (if expired over 3 years, re-test) • Finland (if expired over 2 years, re-test for Group 1) • Germany (no requirement) • Ireland (self-declaration of fitness, verification of normal residence) • Italy (psycho-physical examination) • Latvia (medical examination) • Luxembourg (medical check over 60 years) • Netherlands (no requirement) • Norway (renewed photo) • Romania (physical check) • Iceland (medical examination) • Slovakia (psychological and health examination for category C1-DE) • Slovenia (no requirements) • Sweden (new photo)

Table 4

Have the driving licence directives contributed to a decrease in the number of instances of fraud as compared to the instances of fraud as compared to the period prior to their first implementation (1983)? (N=32)

	Yes	No	Mixed opinions	Do not know / cannot assess
Forged driving licences detected per year	Belgium, Czechia , Cyprus, Denmark, Finland, Hungary, Latvia, Poland, Portugal, Slovakia, Slovenia	Netherlands	Bulgaria[366], Luxembourg[367]	EU: Austria, Estonia, Greece, Croatia, France, Germany, Ireland, Italy, Lithuania, Romania, Spain, Sweden EEA: Iceland, Norway
Driving licence fraud involving citizens of other EU countries per year	Cyprus, Czechia , Hungary, Finland, Portugal, Poland, Latvia, Luxembourg, Slovakia, Slovenia	Italy, Netherlands	Bulgaria	EU: Austria, Belgium, Estonia, Greece, Croatia, Denmark, France, Germany, Ireland, Lithuania, Romania, Spain, Sweden EEA: Iceland, Norway
Driving licence fraud involving citizens of third countries per year	Cyprus, Czechia , Denmark, Poland	Belgium, Finland, Netherlands, Portugal	Bulgaria, Luxembourg	EU: Austria, Estonia, Greece, Croatia, France, Germany, Ireland, Hungary, Italy, Latvia, Lithuania, Romania, Slovakia, Slovenia, Spain, Sweden EEA: Iceland, Norway

Source: Survey with national authorities.

[366] Note that 2 national authorities from Bulgaria have responded to this question and their response was contradictory (one answered 'Yes' whereas the other answered 'No').

[367] Note that 2 national authorities from Luxembourg have responded to this question and their response was contradictory (one answered 'Yes' whereas the other answered 'No').

Table 5

To what extent do you agree with the following statements on current and future needs in terms of legal, social, and technological considerations and developments?

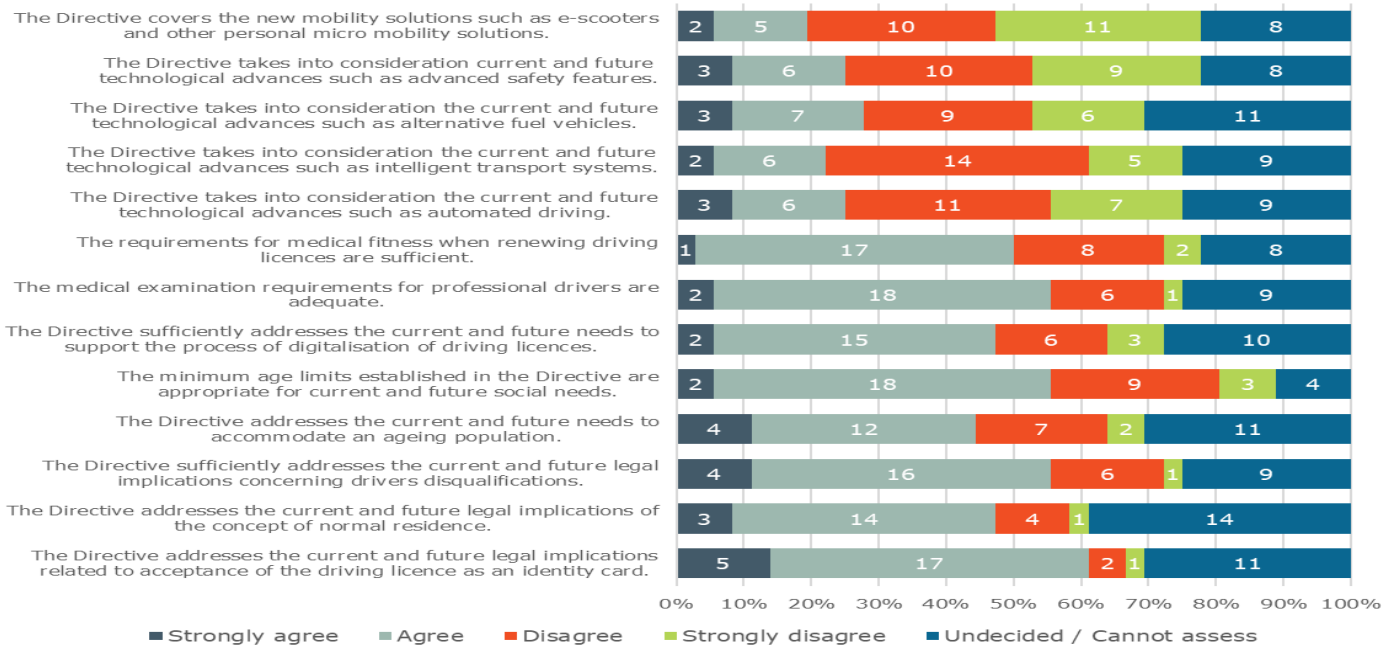


Table 6

Judgments of the Court of Justice of the European Union in preliminary rulings on driving licences

Case number	Date of judgment	MS	Subject
C-56/20	29/04/2021	DE	Request for a preliminary ruling from the Verwaltungsgerichtshof Baden-Württemberg (Higher Administrative Court of Baden-Württemberg, DE) in the proceedings *AR v Stadt Pforzheim.* Driving licences – Mutual recognition – Withdrawal of the licence in the territory of a Member State other than the issuing Member State – Affixing of an endorsement to the driving licence indicating that it is not valid within that Member State
C-47/20	29/04/2021	DE	Request for a preliminary ruling from the Bundesverwaltungsgericht (Federal Administrative Court, DE) in the proceedings *F. v Stadt Karlsruhe* Driving licences – Withdrawal of the licence in the territory of a Member State other than the issuing Member State – Renewal of the licence by the issuing Member State after the withdrawal decision – No automaticity of mutual recognition
C-112/19	28/10/2020	DE	Request for a preliminary ruling from the Verwaltungsgericht Aachen (Administrative Court, Aachen, DE) in the proceedings *Marvin M. v Kreis Heinsberg* Directive 2006/126/EC – Article 2(1) and Article 11(4) – Driving licence – Mutual recognition – Extent of the obligation to recognise – Driving licence having been the subject of an exchange – Exchange made at a time when the right to drive had been withdrawn by the issuing Member State – Fraud – Refusal to recognise the driving licence issued in the context of the exchange
C-9/18	28/02/2019	DE	Request for a preliminary ruling from the Oberlandesgericht Karlsruhe (Higher Regional Court, Karlsruhe, DE) in the criminal proceedings against *Detlev Meyn*

			Directive 2006/126/EC — Mutual recognition of driving licences — Refusal to recognise a driving licence issued in another Member State — Right to drive established on the basis of a driving licence
C-195/16	26/10/2017	DE	Request for a preliminary ruling from the Amtsgericht Kehl (Local Court, Kehl, DE) in the criminal proceedings against *I.* Directive 2006/126/EC — Article 2(1) — Mutual recognition of driving licences — Definition of 'driving licence' — Driving licence pass certificate authorising its holder to drive in the Member State having awarded it before the issue of the definitive driving licence — Situation in which the holder of a test pass certificate drives a vehicle in another Member State — Obligation to recognise the test pass certificate — Penalties imposed on the holder of the test pass certificate for driving a vehicle outside of the Member State in which it was awarded — Proportionality
C-632/15	26/04/2017	RO	Request for a preliminary ruling from the Înalta Curte de Casație și Justiție (High Court of Cassation and Justice, RO) in the proceedings *Costin Popescu v Guvernul României and Others* Directive 2006/126/EC — Article 13(2) — Concept of 'entitlement to drive granted before 19 January 2013' — National legislation transposing the directive — Obligation to obtain a driving licence imposed on persons who were allowed to ride a moped without a licence before the entry into force of that legislation
C-664/13	25/06/2015	LV	Request for a preliminary ruling from the Administratīvā apgabaltiesa (Regional Administrative Court, LV) in the proceedings *VAS „Ceļu satiksmes drošības direkcija"* (Department of Road Safety, CSDD) *and Latvijas Republikas Satiksmes ministrija* (Ministry of Transport of the Republic of Latvia) *v Kaspars Nīmanis.* Driving licence — Renewal by the issuing Member State — Condition of residence in the territory of that Member State — Declaration of residence
C-339/14	21/05/2015	DE	Request for a preliminary ruling from the Oberlandesgericht Nürnberg (Higher Regional Court, Nuremberg, DE) in the criminal proceedings against *Andreas Wittmann.* Directive 2006/126/EC — Mutual recognition of driving licences — Period of prohibition — Issue of the driving licence by a Member State before the entry into force of a period of prohibition in the Member State of normal residence — Grounds for refusing to recognise in the Member State of normal residence the validity of a driving licence issued by another Member State

C-260/13	23/04/2015	DE	Request for a preliminary ruling from the Verwaltungsgericht Sigmaringen (Administrative Court, Sigmaringen, DE) in the proceedings *Sevda Aykul v Land Baden-Württemberg* Directive 2006/126/EC — Mutual recognition of driving licences — Refusal of a Member State to recognise, in the case of a person having driven under the influence of narcotic substances, the validity of a driving licence issued by another Member State
C-356/12	22/05/2014	DE	Request for a preliminary ruling from the Bayerischer Verwaltungsgerichtshof (Higher Administrative Court of Bavaria, DE) in the proceedings *Wolfgang Glatzel v Freistaat Bayern* Directive 2006/126/EC — Point 6.4 of Annex III — Validity — Charter of Fundamental Rights of the European Union — Articles 20, 21(1) and 26 — United Nations Convention on the Rights of Persons with Disabilities — Driving licences — Physical and mental fitness to drive a motor vehicle — Minimum standards — Visual acuity — Equal treatment — No possibility of derogation — Proportionality
C-467/10	01/03/2012	DE	Reference for a preliminary ruling from the Landgericht Gießen (Regional Court, Gießen, DE) in the criminal proceedings against *Baris Akyüz* Directives 91/439/EEC and 2006/126/EC — Mutual recognition of driving licences — Refusal of a Member State to recognise, in respect of a person who does not satisfy the physical and mental requirements for driving under the laws of that Member State, the validity of a driving licence issued by another Member State
C-419/10	26/04/2012	DE	Reference for a preliminary ruling from the Bayerischer Verwaltungsgerichtshof (Higher Administrative Court of Bavaria, DE) in the proceedings *Wolfgang Hofmann v Freistaat Bayern.* Directive 2006/126/EC — Mutual recognition of driving licences — Refusal by a Member State to recognise, in favour of a person whose driving licence was withdrawn on its territory, the validity of a driving licence issued by another Member State
C-224/10	13/10/2011	DE	Reference for a preliminary ruling from the Landgericht Baden-Baden (Regional Court, Baden-Baden, DE) in the criminal proceedings against *Leo Apelt*. Directive 91/439/EEC - Mutual recognition of driving licences - Withdrawal of the national driving licence issued by the Member State of residence and issue of a driving licence for vehicles in categories B and D by another Member State - Refusal of recognition by the Member State of residence - Obligation to hold a valid licence for vehicles in category B at the time of issue of the licence for vehicles in category D.

Annex 6: REFIT costs and benefits

I. Overview of costs – benefits identified in the evaluation									
		Citizens/Consumers		Businesses		Administrations		Other	
		Qualitative	Quantitative / monetary	Qualitative	Quantitative / monetary	Qualitative	Quantitative / monetary	Qualitative	Quantitative / monetary
Benefits	Indirect social benefits	Limited qualitative evidence of improvements in perceived road safety	No quantitative evidence	No data available	No data available				
	Economic benefits of the introduction of a common Community Model driving licence	Limited qualitative evidence of reduction of cost	No quantitative evidence	No evidence of positive economic impact on businesses.		Weak qualitative proof of positive direct economic impact. Weak qualitative evidence of cost-savings for MS authorities			
	Economic benefits of the harmonised rules on administrative validity periods	Limited qualitative evidence of reduction in costs	No quantitative evidence	No evidence of positive economic impact on businesses		Weak qualitative proof of positive direct economic impact	No quantitative evidence		
	Economic benefits of rules on progressive access to category A driving licences	No evidence	No quantitative evidence	No evidence of positive economic impact on businesses		no data available	No data available		
	Environmental	No evidence found on environmental							

	benefits	benefits						
	Unintended benefits (economic/social)	No qualitative evidence of unintended indirect economic/social benefits for citizens.						
	Indirect positive impact on economy	No evidence found on expected indirect positive economy impact the directive led to optimised use of existing infrastructure.						
	Indirect social benefits on safety	No quantitative evidence of expected indirect positive social impact that directive led to improved safety.						
	Indirect environmental benefit	No evidence found on expected indirect positive environmental impact of the directive.						

		Citizens/Consumers		**Businesses**	**Administrations**		**[Other…]**	**Citizens/Consumers**
Costs		**Qualitative**	**Quantitative / monetary**	**Qualitative**	**Quantitative / monetary**	**Qualitative**	**Quantitative / monetary**	**Qualitative**
	Economic costs of the introduction of a common Community Model driving licence	Mixed finding as to marginal raises and decreases in costs	Significant variation in the cost of driving licence fees applied in Member States. Significant differences are found in the driving licence fees incurred in Member States. For a first-time application, they vary between	No qualitative evidence	No quantitative evidence	Mixed finding as to marginal raises and decreases in costs		

			EUR 175 and EUR 6 (categories A, B) and between EUR 218 and EUR 8 (categories C and D). For exchange, the fees vary between EUR 145 and EUR 7 (categories A, B) and between EUR 208 and EUR 7 (categories C and D).					
	Economic costs of the harmonised rules on administrative validity periods	Increased cost for citizens	No quantitative evidence	No qualitative evidence	No quantitative evidence	No raise		
	Economic costs of the rules on progressive access to category A driving licences	Increased cost for citizens	No quantitative evidence of the increase in cost compared to baseline. However, one stakeholder estimates that the costs for obtaining an A licence in Europe can range between EUR 800 to EUR 3,000.	No qualitative evidence	No quantitative evidence	No raise		