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IMPACT ASSESSMENT REPORT

Accompanying the documents

Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

on driving licences, amending Directive (EU) 2022/2561 of the European Parliament and of the Council, Regulation (EU) 2018/1724 of the European Parliament and of the Council and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012
and
Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
on the Union-wide effect of certain driving disqualifications

{COM(2023) 127 final} - {SEC(2023) 350 final} - {SWD(2023) 129 final}

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Glossary

Term or acronym	Meaning or definition
ACEM	European Association of Motorcycle Manufacturers
ADAS	Advanced Driver Assistance Systems
API	Application Programming Interface
BAC	Blood Alcohol Content
BOE	Barrel of Oil Equivalent
CADAS	Centralised Automated Driving Assistance System
CARE	Community database on road accidents
CBE	Cross Border Enforcement
CEETTAR	Confédération Européenne des Entrepreneurs de Travaux Techniques Agricoles Ruraux et Forestiers
CNG	Compressed Natural Gas
COPERT	COmputer Programme to calculate Emissions from Road Transport
CPC	Certificate of Professional Competence
DDL	Data Definition Language
DKU	Dansk Kørelærer-Union
DUI	Driving Under the Influence (of alcohol/drugs…)
ECF	European Cyclists' Federation
ECLI	European Case Law Identifier
EFTA	European Free Trade Association
EIDAS	Electronic Identification, Authentication and trust Services
ETF	European Transport Workers Federation
ETSC	European Transport Safety Council
EUCARIS	European Car And Driving licences Information System
FEVR	Fédération Européenne des Victimes de la Route
FIA	Fédération Internationale de l'Automobile
GDP	Gross Domestic Product

Term or acronym	Meaning or definition
GDPR	General Data Protection Regulation (EU) 2016/679
GDV	German Insurance Association
GP	General Practitioner
HGV	Heavy Goods Vehicle
HPT	Hazard Perception Test
IEC	International Electrotechnical Commission
IIA	Inception Impact Assessment
IRU	International Road Transport Union
ISCO	International Standard Classification of Occupations
ISO	International Standardisation Organisation
LCV	Light Commercial Vehicle
LNG	Liquefied Natural Gas
LPG	Liquefied Petroleum Gas
MS	Member State(s)
OECD	Organisation for Economic Co-operation and Development
OPC	Open Public Consultation
PIN	Road Safety Performance Index
QR code	Quick Response code
RESPER	Réseau des Permis (EU driving licence network)
SDG	Sustainable Development Goal
SME	Small and Medium-sized Enterprises
SSMS	Sustainable and Smart Mobility Strategy
TFEU	Treaty on the Functioning of the European Union
UITP	Union Internationale des Transports Publics
UNECE	United Nations Economic Commission for Europe
VTI	Swedish National Road and Transport Research Institute

1 1 INTRODUCTION: POLITICAL AND LEGAL CONTEXT

1.1 1.1 Political context

This Impact Assessment accompanies a legislative proposal for the revision of Directive 2006/126/EC on driving licences (hereinafter "the DL Directive" or "the Directive")[1] and a legislative proposal for a Directive on the Union wide effect of certain driving disqualifications, which was planned as an integral part of the DL Directive but due to legal considerations has been separated and is presented as an integral, separate legislative proposal for a new directive.

One of the most advanced frameworks in the world on driving licences is in force and applied by the EU and other EEA Member States. Altogether it covers more than 250 million drivers. The cornerstone of this structure is the DL Directive which establishes a common legal framework of measures for the recognition and issuance of driving licences in the European Union. Its objectives are the improvement of road safety and facilitating the free movement of citizens within the EU. With freedom of movement established by the European Single Market, EU rules on driving licences have contributed to ease cross-border travels and facilitated change of residence for citizens establishing themselves in another Member State. Nonetheless, citizens are still confronted with inconsistencies between national approaches, which in turn affect their driving rights. They also face shortcomings and difficulties in the implementation of the Directive.

Road safety in the EU has improved quite significantly over the last 20 years. The number of road fatalities has gone down by 61.5% from around 51,400 in 2001 to around 19,800 in 2021. However, the 2011 White Paper's target[2] to halve road casualties by 2020 compared to 2010 was missed and the decade only recorded a reduction of 37%[3], despite the unprecedented drop in road traffic volumes in the wake of the COVID-19 pandemic which has heavily influenced the decrease of road fatalities between 2019 and 2020[4]. However, the improvement in road safety has not been as strong as needed. The slowdown in the reduction of the number of road deaths that set in around 2014 (see Figure 1) prompted the transport ministers of the EU to issue a ministerial declaration on road safety at the informal transport Council in Valletta in March 2017[5]. In that declaration, the Member States called upon the Commission to explore the strengthening of the EU's road safety legal framework to ensure that even less people die in road crashes.

As part of its third Mobility Package of May 2018, the Commission issued "A Strategic Action Plan on Road Safety"[6] where it called for a new approach to counter the stagnating trend in road safety figures in the EU and move closer to the long-term goal of zero road fatalities across the EU by 2050 ("Vision Zero").

In June 2019, the Commission published the EU Road Safety Policy Framework 2021-2030 – Next steps towards "Vision Zero"[7]. In it, the Commission proposed new interim targets of reducing the number of road deaths by 50% between 2020 and 2030 as well as reducing the number of serious injuries by 50% in the same period, as recommended by the Valletta Declaration, and decided to implement the so-called "Safe System approach". This approach considers death and serious injury in road collisions largely preventable, while acknowledging that collisions will continue to occur. It takes as a point of departure the fact that people make mistakes and aims to ensure that such mistakes do not give rise to fatalities or serious injuries

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1 Directive 2006/126/EC of the European Parliament and of the Council of 20 December 2006 on driving licences (Recast) (Text with EEA relevance), OJ L 403, 30.12.2006, p. 18–60

2 European Commission, Roadmap to a Single European Transport Area – Towards a competitive and resource (2011), White Paper

3 From 29 600 causalities in 2010 to 18 800 in 2020

4 During the first lockdown, ETSC reported a 70-85% reduction in traffic volumes in major European cities (ETSC)

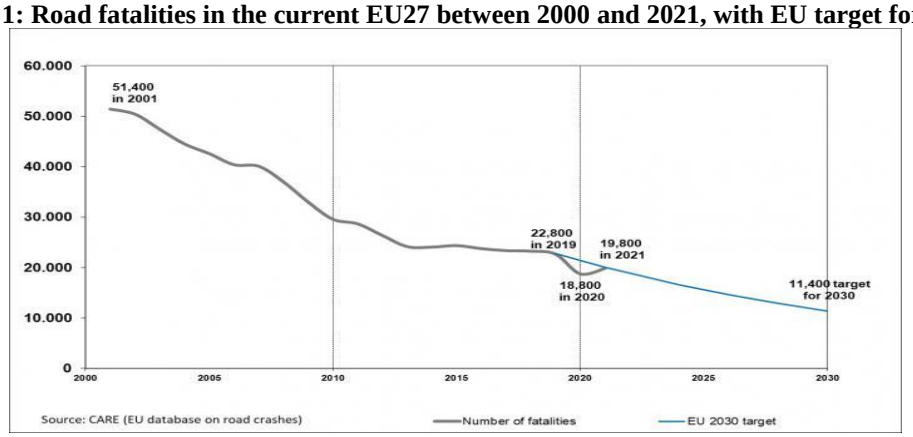
5 See: https://eumos.eu/wp-content/uploads/2017/07/Valletta_Declaration_on_Improving_Road_Safety.pdf; in June 2017, the Council adopted conclusions on road safety endorsing the Valletta Declaration (see document 9994/17).

6 Annex I to COM(2018) 293 final (Europe on the Move. Sustainable mobility for Europe: safe, connected and clean)

7 SWD(2019) 283 final

by holistically focusing on five pillars: safe roads and roadsides, safe speeds, safe road users, safe vehicles, and fast and effective post-crash care, which all contribute to reducing the impact of crashes.

Figure 1: Road fatalities in the current EU27 between 2000 and 2021, with EU target for 2030[8]



In its Sustainable and Smart Mobility Strategy[9] of 2020, the Commission reiterated the target of zero fatalities in all modes of transport by 2050 and announced the revision of the DL Directive, to address technological innovation including mobile driving licences, under Flagship 10 "Enhancing transport safety and security". In October 2021, the European Parliament adopted a resolution on the EU Road Safety Policy Framework 2021-2030[10], calling on the Commission to further promote road safety, notably through higher standards in terms of driver training.

The UN Global Plan for the Decade of Action[11] released in October 2021, which also emphasised the "Safe System approach", promotes the same reduction targets already in place at EU level. It calls also on continued improvements, including on enhancement of laws and their enforcement with a special attention to vulnerable road users and young people.

Finally, it can be also underlined that the commercial road transport sector faces increasing demand and a significant shortage of drivers (400 000 for freight and more than 17 000 for passengers).[12] While many actions are required to allow the sector to answer to the need, the driving licence plays naturally an important role for the access to the profession of driver.

1.2 1.2 Legal context

The EU rules on driving licences aim to ensure a high level of road safety across the European Union by establishing common standards on skills, knowledge, physical and mental fitness of drivers and the verification thereof. They also facilitate the free movement of persons, by reducing the administrative burden on persons transferring their residence to a Member State other than the one that issued their driving licence. Finally, they include measures supporting the fight against fraud and forgery.

The first Directive on driving licences (Directive 80/1263/EEC)[13] introduced the very first set of rules in the EU as regards harmonisation of the national driving licence schemes, in particular through the

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8 Source: https://transport.ec.europa.eu/2021-road-safety-statistics-what-behind-figures_en
9 COM(2020) 789 final
10 P9_TA(2021)0407 https://www.europarl.europa.eu/doceo/document/TA-9-2021-0407_EN.pdf
11 Decade of Action - United Nations Sustainable Development
12 IRU driver shortage report 2022
13 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.

introduction of a Community model of the licence, through the preliminary definition of vehicle categories and by laying down the conditions under which driving licences can be issued or exchanged across the EU. These rules were further refined and extended in the second driving licences Directive (Directive 91/439/EEC)[14]. Most importantly, the mutual recognition of driving licences issued by Member States was established and requirements for a minimum age to obtain a driving licence were introduced. The currently applicable rules were established by the DL Directive adopted in 2006 and became applicable as of 19 January 2009.

Since its adoption in 2006, the Directive has been amended eleven times between 2009 and 2020, mainly to improve the harmonisation of common standards and requirements, as well as to adapt to technological developments.

The Driving Licence Directive specifies the model of the Union driving licence (physical card). It defines the categories of vehicles which can be driven with a given driving licence and the minimum age for obtaining it[15]. It also provides Member States with the optional flexibility to extend certain driving rights to additional vehicles under certain conditions with an effect limited to their territories.

The Directive also defines the conditions for the issuance and renewal of driving licences, in particular:

- the normal residence of the person concerned, enabling the identification of the Member State that should issue the driving licence.

  The implementation of this concept differs across the EU. In particular, it depends on whether a Member State holds or not a registry for foreigners who are EU nationals;

- the requirements on driving skills and knowledge to be met at the theoretical and practical tests.

  The Directive does not lay down rules on the training to be followed before the tests. They are therefore regulated at national level;

- the requirements on physical and mental fitness to drive for applicants and drivers

The methods to assess the compliance with these requirements are not specified in detail, which results in differences among Member States. In addition, the verification is optional at the renewal of driving licences for the categories A (motorcycle) and B (car and small vans). Member States may also decide for more frequent checks when the holder is aged of 55 years or more. These requirements are minimum conditions to be met and Member States can decide to adopt stricter rules to increase road safety.

The Directive introduces the EU network for the exchange of information related to driving licences between national authorities (RESPER). It allows to verify driving rights based on the issuance number of a driving licence and to verify if an applicant has already a driving licence issued by another Member State. It also provides for the possibility of secure messages for any other matter. Such network is used for the implementation of the Directive on driving licences. Some Member States are accessing RESPER through the EUCARIS network[16].

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

[15] The description of the vehicle categories is provided in Annex 7 of this Impact Assessment and a synthesis of the minimum ages can be found in Annex 8 thereof.

[16] EUCARIS – EUCARIS is the EUropean CAR and driving license Information System.

Based on an amendment of the Directive adopted in 2018, RESPER can also be used for the purpose of control, solely in relation to implementing the Directives on driving licences, on the qualification of professional drivers and on the cross border enforcement of road-traffic offenses.

The Directive provides also for specific rules applicable to various aspects of exchange, replacement and withdrawal of driving licences.

It should also be noted that the Directive does not cover all matters regarding driving licences (for example, the EU rules related to licences issued by a third country are very limited in scope) and provides some flexibility regarding its implementation (for example the minimum age for a driving licence of category AM – mopeds – is set to 16 but can vary from 14 to 18 years across the EU).

Regarding driving licences issued by third countries, the Directive specifies the information to be reported on the EU driving licence in the context of an exchange and restricts the recognition of the driving licence in case the holder changes his/her normal residence in the future. The Directive also establishes certain effects of a withdrawal in case the holder relocates in another Member State. However, international agreements and national laws provide for the main rules on these situations.

Indeed, rules on foreign driving licences are largely laid down in the 1968 Vienna Convention[17] in most Member States. However, in Spain, Cyprus, Malta, and Ireland, its predecessor, the 1949 Geneva Convention[18] still applies, which Germany and Latvia are not Contracting Parties of. Both the Geneva Convention and the Vienna Convention provide rules to ensure that duly issued domestic or international driving licences from one Contracting Party are recognised in another one, under certain conditions[19]. Contrary to the rules laid down in the Directive, the Conventions only establish the right to drive when in transit and do not allow for the seamless exchange of the driving licences between the Contracting Parties in case drivers change their residence. The national laws identify the foreign driving licences that can be exchanged (which issuing country, which category) and the conditions associated to the exchange (for example, to undergo a medical examination).

Finally, road traffic rules are a national prerogative, especially for what concerns thresholds and consequences of offenses such as financial penalties, penalty points or driving disqualification. In most of the cases, the effects of a driving ban affecting a non-resident are usually limited to the territory of the state where the offense has been committed.

1.3 1.3 Synergies with the Directive facilitating cross-border exchange of information on road-safety-related traffic offences

Directive (EU) 2015/413 (called hereafter the CBE Directive) aims to improve road safety by ensuring equal treatment of resident and non-resident offenders. In the event of certain road-safety-related traffic offences having been committed with a vehicle registered in another Member State, it grants the Member State where the offence occurred access to the vehicle registration data (VRD) of the Member State of registration of the vehicle concerned. This should facilitate the identification of a driver suspected of committing a road-safety-related traffic offence in a Member States other than that where the vehicle is registered, which is an important element in the cross-border enforcement of traffic offences. An effective cross-border enforcement reduces impunity and hence induces a more cautious behaviour by the drivers concerned. A more cautious behaviour should lead to fewer road accidents and hence a reduction in fatalities, injuries and material damage. However, the CBE

[17] Convention on Road Traffic done at Vienna in 1968
[18] Convention on Road Traffic done at Geneva in 1949
[19] More information on which convention applies in case the country of the driver and the one which roads are used are Contracting Parties to different (or neither) ones: Road Traffic Brochure_EN.pdf (unece.org)

Directive does not provide for instruments enabling the mutual recognition of financial penalties or driving disqualifications.

In its Article 15 on mutual assistance, the Driving Licence Directive provides also for a network for the exchange of information related to driving licences (RESPER). It can be used for the implementation of, and to control the compliance with the Driving Licence Directive, the Directive on professional qualifications[20] and Directive (EU) 2015/413 [21] (the "CBE Directive"). There is currently no legal certainty on the question whether RESPER can be used for the purposes of the CBE Directive (relying on EUCARIS) because of the formulation of Article 15 of the DL Directive and because of the fact that Article 4(4) of the CBE Directive stipulates that Member States must ensure that the exchange of information under the CBE Directive is carried out "*without exchange of data involving other databases which are not used for the purposes of this Directive*". Consequently, a vast majority of law enforcement authorities are not using RESPER for the purpose of control.

The CBE Directive is being revised in parallel to the revision of the Driving Licence Directive, for both legal reasons and reasons of consistency. In this context, the removal of restrictions on the use of other databases is considered. Access to RESPER for the purpose of enforcement will be possible under the conditions specified by the Driving Licence Directive and as a result, more offences are expected to be successfully investigated. This has been assessed in the context of the impact assessment accompanying the revision of the CBE Directive. In addition, the revision of the DL Directive will provide for clarification of all the use cases which require access to RESPER in the context of law enforcement, in order to completely remove legal uncertainties. The scope of the CBE Directive does not include driving disqualifications. The procedural steps included therein only cover measures that can facilitate the identification of the offender and measures related to the content of information that the identified person (mostly the owner or holder of the vehicle) must receive and the language of this information. The revision of the CBE Directive aims to improve enforcement through measures related to the investigation and better identification of offenders. It also aims to improve the protection of the fundamental and procedural rights of the offender. However, it will not provide the necessary legal basis for the mutual recognition of driving disqualifications. As the CBE Directive does not regulate the procedure to the point where a legally binding decision is made, or any issues relating to such a decision or the sanction contained in it, it is not a sufficient tool for mutual recognition (i.e. there is no decision to recognize).

The Court's recent judgement in Case C-266/21 (HV) underlines that the DL Directive not only regulates situations in which a Member State suspends, pursuant to its national legislation and on account of unlawful conduct in its territory, the right to drive of the holder of a driving licence issued by another Member State insofar as it establishes that the effect of such suspension is limited to that territory alone, but that it is also the only legislation in force to do so. Consequently, the mutual recognition of driving disqualification will be addressed in the context of this initiative. The revision of the DL Directive will also build on the corresponding CBE procedures to identify and bring the potential offender to justice in cases where the sanction is driving disqualification, like it is possible today for the case of financial penalties. In fact, the most crucial elements of this cooperation are already in place as the CBE Directive includes already the type of offences, which can be mutually recognised in order to give rise to an EU-wide driving disqualification, such as excessive speed driving and driving under the influence of alcohol.

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[20] Directive (EU) 2022/2561 of the European Parliament and of the Council of 14 December 2022 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers (codification), OJ L 330, 23.12.2022, p. 46.

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

On the other hand, by using the procedures within the CBE Directive not only the effective investigation of these offences can be guaranteed but the protection of the fundamental and procedural rights of the offenders as well. In that context it is important to note that the information letter contained within the current CBE Directive will be revised. The template provided in Annex II to the CBE Directive will be removed and a mandatory minimum content will be identified. This content will include an obligation to provide the offender with information on the possible sanctions for the offence (explicitly naming driving disqualification as an example) and the available legal recourses. Certain parts of the information letter are planned to be given as information, even where the offender is not remotely detected but caught on the spot by authorities. This is important as this measure would ensure that the offender is sufficiently informed about his/her available legal possibilities in case a driving disqualification (or other sanction) would be imposed on him/her. Should the Member State of the offence not comply with the procedures of the CBE Directive, opportunities will be provided to the Member State that issued the driving licence to either refuse the recognition of the decision or to provide additional legal recourse before enforcing the driving disqualification.

1.4 1.4 Synergies with other EU policy instruments

The DL Directive governs driving rights according to vehicle categories. Certain categories are defined by reference to EU rules:

- Council Directive 96/53/EC laying down the maximum authorised dimensions in national and international traffic and the maximum authorised weights in international traffic[22], allowing to identify the types of alternatively fuelled vehicles;

- Regulation (EU) No 168/2013 on the approval and market surveillance of two- or three-wheel vehicles and quadricycles[23], allowing to identify the types of mopeds, motorcycles, motor tricycles and quadricycles.

The DL Directive determines the minimum ages to obtain a driving licence for (future) professional drivers, which are also subject to Directive (EU) 2022/2561 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers[24].

In addition, rules on the protection of personal data also apply to the exchange of information related to driving licences, in particular:

- Regulation (EU) 2018/1725 on the protection of natural persons with regard to the processing of personal data by the European Union institutions, bodies, offices and agencies and on the free movement of such data[25];

- Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation)[26].

Finally, the Commission has adopted on 3 June 2021 a proposal[27] for the revision of Regulation (EU) No 910/2014 as regards establishing a framework for a European Digital Identity. This new framework

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22 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:01996L0053-20190814 OJ L 235, 17.9.1996, p. 59–75
23 OJ L 60, 2.3.2013, p. 52–128
24 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022L2561 OJ L 330, 23.12.2022, p. 46–69
25 https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32018R1725 OJ L 295, 21.11.2018, p. 39–98
26 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02016R0679-20160504 OJ L 119, 4.5.2016, p. 1–88
27 https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM%3A2021%3A281%3AFIN COM(2021) 281 final

provides building blocks relevant for the mobile driving licences. In particular, the electronic identity and, potentially, the electronic wallet features can be used to develop an interoperable solution for EU mobile driving licences.

1.5 1.5 Evaluation of the Driving Licence Directive

An ex-post evaluation of the DL Directive has been published in 2022[28]. Despite the limitations regarding data availability, resulting in limited robustness of certain conclusions, the Directive was considered to have had a generally positive effect on improving road safety and has likely helped to facilitate the free movement of citizens inside the EU. The evaluation acknowledged that the EU transport system is changing fast, due to the impact of digitalisation, an increasing emphasis on active modes in urban transport, the emergence of new forms of mobility, developments regarding connectivity, automation and the increasing role of artificial intelligence, as well as the uptake of low- and zero-emission vehicles. This requires the DL Directive to be adapted, to address not only current needs but also future challenges. The main conclusions of the evaluation and how they have been considered in this impact assessment can be found in Annex 9.

1.6 1.6 Sustainable Development Goals

The initiative aims at improving road safety. In the context of the United Nation's 2030 agenda for sustainable development, it hence directly contributes to sustainable development goal #11 *"Make cities and human settlements inclusive, safe, resilient and sustainable"* and in particular to target 11.2 *"By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons"*.

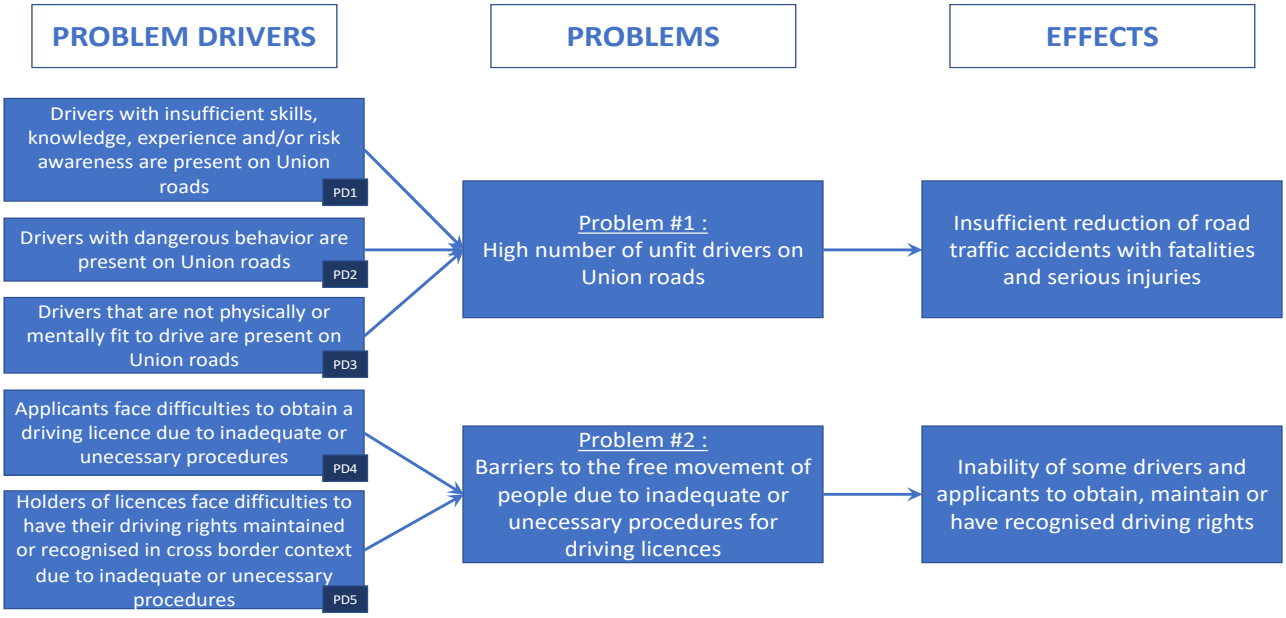
2 2 PROBLEM DEFINITION

2.1 2.1 What are the problems?

The ex-post evaluation found that the Directive has contributed to an improvement of road safety. However, in light of the ambitious EU targets (Vision Zero and Valletta Declaration), more efforts are needed to reduce road fatalities and serious injuries. The revision of the Directive could contribute to it. Similarly, the Directive has had a positive impact on the free movement of citizens in the EU. However, certain provisions still result in administrative burden or obstacles to the free movement of people. This is the case of, for example, rules on normal residence and on the recognition of driving licences issued in third countries. An overview of the problem drivers, problems and their implications is presented in Figure 2**Figure 2**.

Figure 2: Problem tree

[28] Evaluation of the Directive 2006/126/EC of the European Parliament and of the Council of 20 December 2006 on driving licences _SWD/2022/0017 final.



2.1.1 Problem 1: High number of unfit drivers on EU roads

Problem 1 is related to holders of driving licences whose presence on EU roads presents risks due to their lack of fitness to drive. In many serious crashes resulting in death, serious health loss and non-fatal injuries, the driver's skills, knowledge, behaviour and medical fitness play an important role.

Monitoring of road traffic fatalities and serious injuries does not account for the cause of an accident because it is often difficult to determine it accurately, being related to multiple factors (e.g. a small hole in the asphalt, a moment of distraction and insufficient fitness to react) and it is not determined at the time of data collection. It is therefore impossible to quantify accurately the underlying cause(s) of fatalities or serious injuries resulting from road accidents. In addition, and despite the fact that the ambitious EU targets on road safety are not met, road safety in the EU is quite advanced, with only 42 road fatalities per million inhabitants in the EU, while the global average is 167[29].

Skills, knowledge, risk awareness and experience remain limited particularly for novice drivers. This constitutes an intrinsic part of the learning curve, but also the reason for the existence of driving licences, which establishes at what point of the learning curve (i.e. the minimum requirements in terms of knowledge and experience) novice drivers are issued a licence and are allowed to drive on EU roads. The higher level of accidents and fatalities of novice drivers indicates that the requirements for issuing driving licences are not fully calibrated to road safety objectives. In 2019, young road user deaths represented around 23% of all road deaths in the EU and 2 out of 5 fatal collisions involved a young driver or rider (aged 15 to 30).[30] According to the CARE database, for every 100,000 experienced drivers[31], on average there are 3 experienced driver fatalities per year, while for every 100,000 novice drivers[32], there are 10 novice driver fatalities.

In addition, the progressive introduction of new technologies such as advanced driver assistance systems and, in the future, automated vehicles will have a substantial impact on the use of vehicles.

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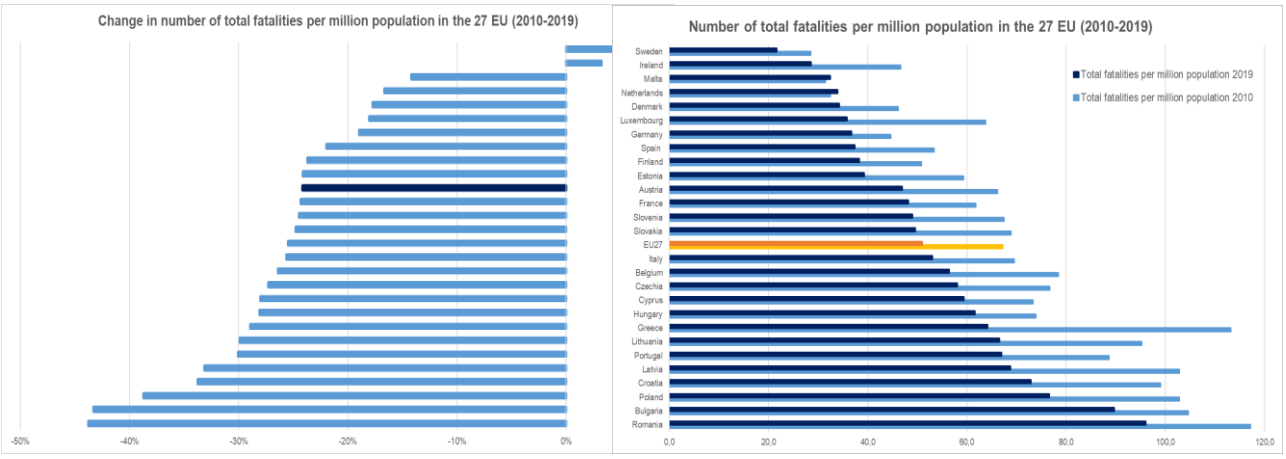
29 https://www.acea.auto/figure/road-fatalities-per-million-inhabitants-europe-and-world/
30 Source: ETSC PIN Flash Report 41 - https://etsc.eu/wp-content/uploads/PIN-Flash-41_web_FINAL.pdf
31 More than11 years after obtaining their driving licence
32 Less than 4 years after obtaining their driving licence

Whereas such technologies have the potential to improve road safety and contribute to more inclusive mobility, they also bring new challenges for the drivers in terms of skills and knowledge of new functionalities, which are not covered by the current Directive.

Another group of drivers unfit to drive are those with dangerous behaviour. From an EU perspective, it concerns more specifically drivers committing a very serious infraction. There is currently no mutual recognition of driving disqualifications for offences committed in a Member State other than the one that issued the driving licence. When the disqualification concerns a non-resident, nothing prevents the latter from continuing to drive in all Member States, except for the one where he or she was convicted. As drivers who commit serious traffic offences in other Member States are not held accountable, there is no equal treatment of resident and non-resident offenders in the EU. This situation creates imunity and is not conducive to improving road safety.

Finally, the last category of drivers presenting risk on European roads are those that are not physically or mentally fit to drive. The ex-post evaluation has found that the current age-based screening is no longer perceived as the most relevant. Although there is evidence about potential physical deterioration connected with age, some studies have concluded that specific medical conditions, such as substance abuse, mental disorders, epilepsy and diabetes, heart conditions and sleep apnoea are not necessarily connected with age, while at the same time being more important factors when it comes to the medical fitness to drive.[33]

Figure 3 Change (a) and total number (b) of road fatalities per million population in the 27 EU countries (2010-2019), reference year 2010



(a) (b)

Source: CADAS Data (2019)

[33] Charlton J et al. (2010) Influence of chronic illness on crash involvement of motor vehicle drivers, Monash University Accident Research Centre.

The persistently high number of traffic fatalities and serious road traffic injuries – which in part is due to too many dangerous and unfit drivers on EU roads – remains a major societal problem, causing human suffering and losses as well as unacceptable economic costs estimated at EUR 250 billion yearly, or 2% of GDP[34]. Between 2010 and 2019, the number of road deaths in the EU decreased by 23% (from 29,600 to 22,800 fatalities per year) and the number of serious injuries by 20%[35]. The decrease in the number of fatalities has been heterogeneous by Member State (see Figure 3). However, in 2019, road crashes in the EU still claimed 22,800 lives and left more than 1.2 million people injured. In 2020, some 18,800 people were killed on EU roads. Although that number was more than 17% below 2019, this high annual reduction rate was heavily influenced by an unprecedented drop in road traffic at the height of the COVID-19 pandemic[36]. In 2021, the number of fatalities increased to 19,800.

According to five interviewed national authorities,[37] current rules at national level are satisfactory and sufficient to deliver on the road safety targets established at the EU level. Two others,[38] however, find them insufficient to reach EU road safety targets. Regarding the adequacy of physical and mental fitness rules in place in the EU, six Member State authorities[39] consider that updating these rules is needed.

Finally, it should be highlighted that according to the "Safe System Approach" referred to in section 1.1, many factors have to be considered when analysing a road crash: the infrastructure, the vehicle, the traffic, the driver and the emergency services. In that context, the accurate identification of underlying causes depends on the availability of relevant information gathered in the process of recording road fatalities or serious injuries. This difficulty is increased by the fact that crashes usually result from multiple causes, hence the limitations which are associated with the use of such data.

2.1.2 Problem 2: Barriers to the free movement of people due to inadequate or unnecessary procedures for driving licences

A limited number of unnecessary or unjustified procedures for obtaining the licence or exercising or maintaining driving rights in another EU country remains in place when drivers obtain, use, replace, renew, or exchange driving licences. This ultimately hinders their free movement within the EU. According to the evaluation, some measures of the Directive (such as the concept of normal residence) have been difficult to apply and may have led to a high administrative burden or obstacles to free movement. In practice, citizens with well-documented driving rights that are confronted with such remaining barriers may remain without driving licences for up to 6 months or even longer. The evaluation noted progress towards digitalisation of driving licences in some Member States, but with limited effects in the absence of a European framework.

In addition, ten individual complaints addressed to the Commission have shown that the current Directive may, in certain cases, prevent EU citizens from obtaining a driving licence in countries where their knowledge of the local language is insufficient and where an interpreter is not authorised during the tests. They have also confirmed problems resulting from diverging applications of the concept of normal residence. Moreover, several cases have been brought to the Court of Justice of

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[34] Sustainable and Smart Mobility Strategy – putting European transport on track for the future https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0331&from=EN

[35] CADAS Data (2019)

[36] During the first lockdown of April 2020, ETSC reported a 70-85% reduction in traffic volumes in major European cities (https://etsc.eu/covid-19-huge-drop-in-traffic-in-europe-but-impact-on-road-deaths-unclear/)

[37] DE, FI, SI, SE, FR

[38] NL, BG

[39] DE, BG, NL, BE, SE, FR

the European Union (hereinafter "the Court") when drivers, whose driving licence was withdrawn, were abusing this situation or were facing disproportionate consequences for the offence committed.

Furthermore, there are no common rules for the exchange of driving licences issued by third countries when the holder establishes his or her residence in the European Union, and the EU licences obtained in one Member State may cease to be valid in case this person transfers his or her residence to another Member State. For example, in Sweden, only licences issued by the United-Kingdom, the Faroe Islands, Switzerland and Japan are exchanged, while Finland exchanges licences issued by more than 100 countries.

Finally, several Member States[40] have introduced, or are planning to introduce, national mobile (digital) driving licences without being accompanied by the issuance of a physical support (i.e. card). As the current Directive establishes the principle of mutual recognition only for physical licences, mobile driving licences will therefore remain valid only on the territory of the issuing State. Consequently, the current framework is an obstacle to reaping the benefits of digital transformation of road transport at European level and hinders free movement across the EU.

Barriers to the recognition, the acquisition or the renewal of driving rights can socially and financially affect the life of the drivers concerned in a profound way. Though the issues at stake are limited in scope[41], the impact on the affected citizens is extremely important. Several studies have identified the lack of car access as an important barrier to accessibility to, and uptake of, employment. Studies with such findings have been conducted in, amongst others, Belgium[42], Czechia[43], France[44], Ireland[45] and Spain[46]. Other studies[47] find a clear link between holding a driving licence, access to cars and gainful employment for young persons.

In the open public consultation for this impact assessment, 59% of respondents (4,462 out of 7,532) indicated that removing unjustified obstacles to obtaining driving licences (first issuance) in the Directive is very important. A lack of mutual recognition of theoretical driving tests is another example of a possible obstacle to free movement, and indeed it was assessed as an important problem by 12 out of 20 respondents from Member State authorities in the survey. Similarly, regarding medical exams taken in one Member State and not being recognised in another Member State, 11 out of 20 respondents from national authorities considered it as an important problem. Likewise, 14 out of 20 respondents from national authorities find that applicants moving to another Member State and

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[40] Already available (Spain, Denmark, Greece, Poland, Portugal) and under consideration (Austria, Belgium, Cyprus, Estonia, Finland, Germany, Ireland, Italy, Lithuania, Luxembourg, Netherlands, Sweden) according to UNECE informal document 10 of 13 September 2022 and consultation activities.

[41] EU residents do not usually face these barriers. It concerns only very specific situations.

[42] Fransen K., Deruyter G., De Maeyer P., The impact of driver's licence ownership on unemployed job seekers' access to job openings: Assessing the driver's licence at School project in Flanders, Case Studies on Transport Policy, Volume 6, Issue 4,2018, Pages 695-705, https://doi.org/10.1016/j.cstp.2018.08.008.

[43] Marada M., Květoň V. Transport supply and demand changes in relation to unemployment: Empirical evidence from the Czech Republic in a time of crisis. Tijdschrift Voor Economische en Sociale Geografie, 107 (2016), pp. 611-627.

[44] Cavaco S. et al. Contraintes spatiales et durée de chômage. Revue Française D'économie, 18 (2004), pp. 229-257.

[45] O'Connell P.J., McGuinness S., Kelly E. The transition from short- to long-term unemployment: A statistical profiling model for Ireland Economic and Social Review, 43 (2012), pp. 135-164.

[46] Matas A, Raymond JL, Roig JL (2010) Job accessibility and female employment probability: The cases of Barcelona and Madrid. Urban Studies 47: 769–787.

[47] Aretun, A., Nordbakke S., Developments in driver's licence holding among young people. Potential explanations, implications and trends. VTI, Linköping Sweden 2014.

not being able to take their licence in the Member State of residence as they do not speak the language, nor English, to be an important problem and a possible barrier to the free movement of citizens.

Regarding driving licence tourism, the problem has significantly reduced with the introduction of RESPER (EU network for the exchange of information on driving licences) which enables authorities to verify if driving rights exist or have been revoked in another country. Regarding fraud and forgery, the fraudsters also benefit from the evolution of technologies and while the risk remains present, it is mainly linked to forged driving licences using the old models. The obligation of the current Directive for all driving licences to comply with the new model (plastic card) by 2033 is expected to significantly mitigate the issue.

2.2 2.2 What are the problem drivers?

2.2.1 Problem driver 1: Drivers with insufficient skills, knowledge, experience and/or risk awareness are present on EU roads

Driving involves a large set of rather diverse skills, in particular information acquisition and perceptual-motor coordination, anticipation and assessment of the traffic situation, risk estimation, setting safety margins, balancing the disparate attractions of speed and caution. Driving requires to master relatively easy skills, like vehicle handling, and also more complex cognitive skills[48]. Indeed, while vehicle handling skills are relatively easy to master in only a few hours, skills such as anticipation of potentially hazardous traffic situations require years of practice.

For the period 2017-2020, for every 100,000 novice drivers[49], there are 10 novice driver fatalities, whereas for every 100,000 experienced drivers[50], there are just 3 experienced driver fatalities, based on most recent CARE data available from 18 EU countries[51].

The link between driving skills and knowledge and road safety is confirmed by research[52]. Inexperience and age are considered the main factors behind the high rate of collisions involving young and novice drivers. Multiple studies demonstrated that a lack of driving experience is translated into a greater probability of being involved in road crashes as well as of serious breaches of road traffic laws[53, 54, 55, 56].The lack of driving experience, in terms of kilometres driven, affects the capacity to control adequately the vehicle in difficult situations and increases the tendency to commit operative errors (e.g. harsh braking or close following), and increases the probability to be involved in near crash events[57]. The evaluation[58] and

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48 DaCoTA (2012) Novice Drivers, Deliverable 4.8j of the EC FP7 project DaCoTA https://www.dacota-project.eu

49 Less than 5 years after obtaining the driving licence

50 Between 10 and 20 years after obtaining the driving licence

51 Austria, Bulgaria, Croatia, Denmark, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Luxembourg, Poland, Portugal, Romania, Slovakia, Slovenia and Spain

52 European Commission (2017), Study on driver training, testing and medical fitness.

53 Alfonsi, R., Ammari, A., Usami, D. S. (2018), Lack of driving experience, European Road Safety Decision Support System, developed by the H2020 project SafetyCube. Retrieved from www.roadsafety-dss.eu on 03/11/2021

54 Massie, D. L., Green, P. E., & Campbell, K. L. (1997). Crash involvement rates by driver gender and the role of average annual mileage. Accident Analysis & Prevention, 29(5), 675-685.

55 Li, G., Braver, E. R., & Chen, L. H. (2003). Fragility versus excessive crash involvement as determinants of high death rates per vehicle-mile of travel among older drivers. Accident Analysis & Prevention, 35(2), 227-235.

56 Maycock, G. (1985). Accident liability and human factors – researching the relationship. Traffic Engineering and Control, 26(6), 330-335.

57 Simons-Morton, B. G., Ouimet, M. C., Zhang, Z., Klauer, S. E., Lee, S. E., Wang, J. & Dingus, T. A. (2011). Crash and risky driving involvement among novice adolescent drivers and their parents. American Journal of Public Health, 101(12), 2362-2367.

58 Evalution of Directive 2006/126/EC of the European Parliament and of the Council of 20 December 2006 on driving licences SWD (2022) 17 final

the implementation report[59] highlighted that the missing element in current driver training and testing was risk awareness and hazard preparation exercises. In addition, training drivers to be able to use efficiently the state-of-the-art safety-related technologies that will also protect other road users (e.g., pedestrians, cyclists, riders of powered two wheelers) is also missing. In the public consultation underpinning this impact assessment[60], 3,358 out of 7,532 (44%) respondents considered improving drivers' skills and knowledge in the Directive as extremely/very important and 2,829 out of 7,532 respondents (37%) as important. This view was concurred by Member State authorities in the survey, where 19 out of 32 respondents in this group (59%)[61] agreed that insufficient driving experience and/or risk awareness, in particular of novice drivers, is a very important problem for road safety.

In addition to the case of novice drivers, drivers need skills and knowledge when driving new vehicles which include advanced technologies that assist the driver and aim at improving road safety. The maturity of technologies does not presently allow for them to totally replace the driver. Additional skills and knowledge are required to ensure an effective and safe use of these technologies, starting with advanced driving assistance system (such as advanced breaking systems or intelligent speed assistance), but also preparing for the use of more advanced vehicle automation. Multiple studies [62,63,64] have also confirmed that over-reliance and inappropriate use of ADAS have been highlighted as a safety risk reducing effectiveness of various ADAS systems, which could be mitigated through training. During the targeted interviews, seven Member State authorities[65] expressed the need for updating the rules to account for new technologies, such as autonomous driving, ADAS, eco-driving, the ability to use navigation and the knowledge related to alternatively fuelled vehicles. In the targeted survey among national authorities, 16 out of 30 respondents[66] assessed insufficient skills and knowledge of drivers concerning new safety technologies as important for road safety, and only 2 respondents did not consider it a problem.

Moreover, the vehicle categories no longer fully match the market situation which has evolved, resulting in insufficient skills and knowledge of certain drivers. For instance, a licence of category AM is required to drive a moped while this is not the case for an e-scooter, even if both vehicles have a maximum design speed above 25 km/h. In addition, during the first workshop, UITP[67] has reported the evolution of the market offer regarding minibuses. They are now able to carry up to 22 passengers (16 currently for category D1) while their length remains below 8 meters. CEETTAR has also indicated the differences among national licences for agricultural vehicles, which is an issue for posted workers.

2.2.2 Problem driver 2: Drivers with dangerous behaviour are present on EU roads

ETSC reports that exceeding speed limits and drink driving are among the important factors leading to death and serious injury on European roads, along with failing to wear seatbelts. [68] Furthermore, findings from a recent study indicated that speeding drivers as well as drivers driving under the influence (DUI) of alcohol or drugs were frequently involved in single-vehicle crashes under low-volume conditions

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59 'The implementation of Directive 2006/126/EC on driving licences – Final report' by Hasselt University et al,, 2017 http://publications.europa.eu/resource/cellar/bbd8141d-e603-11e7-9749-01aa75ed71a1.0001.01/DOC_1

60 COWI, Ecorys and NTUA (2022), Impact assessment support study

61 More than one authority responded from some Member States, thus the number of 32 respondents.

62 https://etsc.eu/us-study-shows-drivers-let-their-focus-slip-as-they-get-used-to-driver-assistance-systems/

63 https://aaafoundation.org/understanding-the-impact-of-technology-do-advanced-driver-assistance-and-semi-automated-vehicle-systems-lead-to-improper-driving-behavior/

64 https://www.fiaregion1.com/wp-content/uploads/2020/10/FIA-Region-I-_ADAS-study_18122020.pdf

65 DE, BE, NL, BG, FI, SE, FR

66 More than one authority responded from some Member States, thus the number of 30 respondents.

67 https://www.uitp.org

68 https://etsc.eu/wp-content/uploads/ETSC_PINFLASH42_v2TH_JC_FINAL_corrected-060522.pdf

(night-time, weekend, low-volume roads).[69] During the period 2016-2020, 41% of total driver fatalities in Europe concerned single-vehicle road crashes, mainly due to dangerous behaviour[70]. For the same period 2016-2020, 50% of novice driver (18-24) fatalities concerned single-vehicle road crashes[71]. Statistics also show that men are mainly affected by the problem of drink-driving.[72] Considering these findings, the great majority of single-vehicle crashes occur as a result of dangerous behaviour.

The consequence of a road traffic offence on the offender's driving licence differs very much across the EU, depending on the country of issuance, residence and offence. A driving licence can be suspended or withdrawn when its holder commits serious road traffic offences. However, this decision can only be taken by the State of issuance or State of residence[73]. When a person commits such an offence abroad, he or she is banned from driving only in that country (the State of offence). In such a situation, a dangerous driver can continue to drive in all EU Member States apart from the State of offence and still poses a threat to road safety in those countries.

Based on an amendment of the DL Directive adopted in 2018, RESPER can also be used for the purpose of control, however exchanges in the context of the Committee on driving licences have shown that the 2018 amendment to the Directive does not specify the use cases for law enforcement in a way that allows for a clear mapping with the practices on the field. It creates a risk that certain uses of RESPER by law enforcement authorities could be challenged before the Court. In addition, these consultation activities have shown that the response time is not always satisfactory, and the data quality could be improved.

The share of speeding offences committed by drivers in foreign vehicles differs greatly across Member States. For example, holiday and transit countries (e.g. Austria, Luxembourg and France) attract a lot of non-resident drivers, while the more remote countries are likely to attract less foreign traffic. Although the share of detected offences with foreign registered vehicles differs significantly between Member States (Hungary 91%, Luxembourg 42%), on average around 18% of all speeding offences are committed by drivers in foreign vehicles. This means that there is a material group of drivers who commit serious traffic offences in other Member States but are not (fully) held accountable for them. The investigation of offenses potentially resulting in driving disqualifications committed by non-residents is not covered by the CBE Directive. The procedural steps included therein only cover measures that can facilitate the identification of the offender and measures related to the content of information that the identified person (mostly the owner or holder of the vehicle) must receive and the language of this information. The revision of the CBE Directive aims to improve enforcement through measures related to investigation and better identification of offenders, and to improve the protection of the fundamental and procedural rights of the offender. However, it will not provide the necessary legal basis for the mutual recognition of driving disqualifications.

The evaluation of the Driving Licence Directive[74] concluded that the absence of a clear EU framework for the mutual recognition of driving disqualification poses challenges when it comes to preventing abuses by drivers that commit offences on the territory of one Member State but then can continue to drive in other Member States without bearing consequences of the offences. This was corroborated by the views of 16 out of 21 respondents representing national authorities who saw the

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69 Speeding and impaired driving in fatal crashes-Results from in-depth investigations - PubMed (nih.gov)
70 Based on most recent CARE data available from 25 EU countries (all but Cyprus and Ireland)
71 ibid
72 https://etsc.eu/83-of-drink-drivers-are-men/
73 In that later case, the Directive allows the state of residence to proceed with the automatic exchange of the driving licence in accordance with its police and judicial laws
74 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022SC0017

fact that residents and non-residents in the EU do not face the same consequences regarding driving disqualification as a generally important problem. Also, respondents identified as an important problem the fact that residents and non-residents do not face the same consequences regarding penalty/demerit points (11 out of 21 respondents). When asked about the absence of a mutual recognition of driving disqualification, some Member States[75] confirmed that it renders difficult the enforcement of disqualification across borders and hence poses a risk to road safety in the EU, especially in cases where the banning from driving resulted from serious offences (e.g. driving under the influence of alcohol among others).

2.2.3 Problem driver 3: Drivers that are not physically or mentally fit to drive are present on EU roads

According to results of the survey conducted in the context of the support study, a range of 5-15% of all traffic accidents were attributed to driver's medical condition. This range is confirmed by multiple sources: the ETSC PIN Flash Report 40 (2021) indicates that, in Finland, 16% of all fatal collisions are attributed to a driver illness[76]. In France, close to 4% of total accidents was attributed to medication[77]. A Danish report[78] revealed that, during the period 2017-2019, 9% of traffic accidents was attributed to impaired physical conditions and 1% to an unbalanced state of mind[79]. Ageing is an important factor when considering the mental and physical ability to drive. Elderly drivers are more prone to be involved in a car accident.[80] Currently, more than 20% of road fatalities in the EU are caused by drivers over 60 years old, while they represent approximatively 30% of all licence holders. In particular, the presence of cognitive dysfunction due to the ageing process, especially in the case of neurocognitive disorders of high prevalence, such as Alzheimer's disease, may critically compromise a person's fitness to drive[81] [82]. Finally, apart from functional limitations, physical vulnerability is also a factor which contributes to the relatively high fatality rate and increased crash severity for elderly road users in road crashes.[83]

In the survey among national authorities[84], 8 out of 22 respondents (36%) considered the problem of inadequate medical screening of all drivers as important, while 4 out of 22 (18%) did not identify it as a problem for road safety. 10 out of 22 respondents (45%) from other groups of stakeholders considered that insufficient medical screening constitutes an important or very important problem for road safety. Overall, stakeholders other than national authorities argued that the focus on medical requirements in Annex III of Directive 2006/126/EC is too narrow and that there is a lack of clinical guidelines and scientifically validated criteria. They believed that the focus should be placed on functional requirements to drive rather than age-related requirements and argued that there should be a standardised set of procedures for screening medical fitness to drive across the EU to help medical professionals detect medical/fitness to drive issues.

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75 BG, SE, BE

76 https://etsc.eu/wp-content/uploads/PIN-Flash-40_Final.pdf

77 La sécurité routière en France : Bilan de l'accidentalité de l'année 2019

78 Ulykkesfaktorer in Vejdirektoratet (2020) Dødsulykker 2019 Årsrapport

79 https://www.statistik.at/fileadmin/publications/Strassenverkehrsunfaelle-2021.pdf

80 Oxley, J., Corben, B., Fildes, B., O'Hare, M., & Rothengatter, T. (2004). Older vulnerable road users- measures to reduce crash and injury risk. Monash University Accident Research Centre Reports, 218, 162.

81 Jacobs M., Hart E. P., Roos R.A.C. (2017). "Driving with a neurodegenerative disorder: an overview of the current literature", Journal of Neurology, Volume 264, p. 1678-1696.

82 Pavlou, D., Beratis, I., Papadimitriou, E., Andronas, N., Kontaxopoulou, D., Fragkiadaki, S., Yannis, G., Papageorgiou S.G. (2017) Mild Cognitive Impairment and driving: Does in-vehicle distraction affect driving performance? Accident Analysis and Prevention, Volume 103, p. 148-155.

83 European Commission, Older Drivers, European Commission, Directorate General for Transport, September 2015 https://road-safety.transport.ec.europa.eu/system/files/2021-07/ersosynthesis2015-olderdrivers25_en.pdf

84 COWI, Ecorys and NTUA (2022), Impact assessment support study

During the interviews[85], Member States authorities[86] expressed the need for changes to minimum standards for physical and mental fitness to drive. In the survey, most respondents from national authorities (68% or 15 out of 22) acknowledged the insufficiency or inadequacy of standards for medical fitness as a problem. This view was concurred by respondents other than national authorities who considered insufficient or inadequate standards on physical and mental fitness to be a very important (24%) or important (44%) problem for road safety. Regarding the age-related medical screening, some Member States[87] during the interviews did not think of aging as a problem and opposed the idea that more frequent medical screening for older drivers would be needed. According to one Member State[88], this would in fact restrict elders' right to mobility too soon. Another MS[89] instead remained open to the idea of limiting older drivers' mobility under certain conditions (e.g., driving during the night, a limit of kilometres that can be driven).

However, while there is evidence about the potential physical deterioration connected with age, some studies have concluded that specific medical conditions, such as substance abuse, mental disorders, epilepsy and diabetes, heart conditions and sleep apnoea are not necessarily connected with age. At the same time, they are more important factors when it comes to medical fitness to drive.[90] Consequently, mandatory age-based screening of drivers has not been shown to be effective in preventing severe collisions.

2.2.4 Problem driver 4: Applicants face difficulties to obtain a driving licence due to inadequate or unnecessary procedures

Complaints addressed by citizens to the Commission[91,92], the ex-post evaluation and consultation activities in the frame of this impact assessment have shown that obtaining a driving licence may be hindered by inadequate or unnecessary procedures.

The current rules under the DL Directive on normal residence provide for a strong framework to fight against fraud but may not be fully adequate anymore due to the changes in mobility patterns within the EU during the past two decades.

The Directive (Article 12) defines normal residence as "*the place where a person usually lives, that is for at least 185 days in each calendar year, because of personal and occupational ties, or, in the case of a person with no occupational ties, because of personal ties which show close links between that person and the place where he is living*". It allows to determine the Member State competent to issue a driving licence for a person. The conditions of establishment of a normal residence differ however from one Member State to another and are mainly linked to national fiscal rules, but also the respective registration rules. In addition, the normal residence may also be determined based on the personal ties of the person, irrespective of his or her place of residence. The current concept results in a situation where a person can have multiple normal residences or where the normal residence cannot be identified (usually during the six first months after a person relocates

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85 COWI, Ecorys and NTUA (2022), Impact assessment support study
86 DE, BG, NL, BE, SE, FR
87 DE; FR,SE
88 DE
89 FR
90 Charlton J et al. (2010) Influence of chronic illness on crash involvement of motor vehicle drivers, Monash University Accident Research Centre.
91 CHAP (Complaints Handling – Accueil des Plaignants) is the Commission IT tool for registering and managing complaints and enquiries by European citizens or businesses concerning the application of EU law by a Member State.
92 SOLVIT (Solutions to problems with your EU rights) is a service provided by the national administration in each EU country and in Iceland, Liechtenstein and Norway. SOLVIT aims to find solutions within 10 weeks – starting on the day your case is taken on by the SOLVIT centre in the country where the problem occurred.

from one MS to another). During interviews, when asked about whether the current implementation of normal residence in Member States impacts the free movement of people in the European Union, most interviewed Member State authorities found the definition of normal residence problematic, to the extent that some[93] called for guidance or a clarification of normal residence from the EU to ensure uniform application of the principle. Other Member States[94] reported issues with residents caught in between Member States, who cannot apply (or renew) for a licence in the Member State they are living as normal residents nor in their new Member State as they have not passed the 185-days threshold in that country. The importance of the problem was also confirmed by 12 out of the 20 representatives of national authorities responding to the survey.

Difficulties may also occur when a person establishes his or her normal residence in another Member State and should pass the tests in the new country of residence, while that person does not have a sufficient level of skills of the languages available for the tests. It is especially true when national rules do not allow for an interpreter and when no/limited tests in another language are provided. Such a situation arises in particular in the case of the theoretical tests for which the testing time is limited and questions require an advanced knowledge of the language used. It may also affect practical tests when a quick reaction is expected. The impact assessment support study[95] has shown that in 2021, there were between 40,000 and 80,000 potential applicants that could not conduct the test due to language barriers. This language issue was generally perceived as an important problem by 14 out of the 20 respondents representing national authorities in the survey, although to different degrees. This was however seen as less of a problem when applicants for graduated access for motorcycles have to pass through cumbersome and costly procedures to obtain their licence (7 out of 20 respondents).

Additionally, existing rules limit the right to drive vehicles with an automatic transmission gear only when the test has been passed on such a vehicle. A procedure for extending the right to drive also manual transmission gear vehicles once a licence for automatic transmission gear vehicles is obtained is not foreseen. Consequently, the holder of a driving licence subject to this restriction has to undergo the complete curriculum required from any applicant, including the driving test, to have the restriction removed. With the progressive electrification of the car fleet and the phasing out of conventional fuel vehicles, and in particular the proposed phasing out of new conventional fuel cars and vans (part of the "Fit for 55" package[96]), automatic transmission gear is expected to be the norm in new vehicles in the future. Certain vehicle manufacturers also indicated that they are even considering to stop placing on the market new vehicles with manual transmission gear earlier than previously thought[97,98]. By 2030, around 15% of the car fleet is projected to be equipped with automatic gear transmission, going up to over 90% by 2050.

Moreover, the lifetime of vehicles in driving schools is usually of 2 or 3 years[99] and, thus, it is expected that the fleets of driving schools will change to automatic transmission gear vehicles much faster than the overall fleet. Therefore, the existing DL Directive does not seem sufficiently aligned with the European Climate Law and with technological developments. In the survey[100], respondents from national authorities were divided on this issue: 8 out of 20 respondents did not consider it a problem, whereas 7 did consider it as an important problem to different degrees. Respondents outside the national administration were slightly more convinced that this could be a problem, 9 out of 22 respondents identified the issue of drivers tested on

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93 BE, BG, SE, FI
94 NL, BE
95 COWI et al. (2022), Impact assessment support study for the revision of the directive on driving licences
96 Delivering the European Green Deal | European Commission (europa.eu)
97 Articles of Auto Motor Sport
98 Articles of Automobilwoche
99 Lesauto kost rijschoolhouder 8 euro per lesuur | RijschoolPro
100 COWI, Ecorys and NTUA (2022), Impact assessment support study

automatic gear not being allowed to drive a manual gear unless they pass another examination to be an important problem.

Another obstacle resulting from the transition to zero-emission vehicles is related to their mass. The increased mass of some of these vehicles (e.g. because of batteries) may exceed the maximum mass of vehicles authorised to be driven with a driving licence of category B and require a licence of category C.

Finally, the consultation activities have underlined that road transport operators consider the minimum age for categories C and D (18 and 21 years) an obstacle for pupils leaving the school at 16 years old to access the profession of drivers because of the resulting time to obtain a licence, which is too long. The 2022 report[101] of the International Road Transport Union (IRU) on the shortage of drivers identifies for 2021 3 million truck drivers and 425 thousand unfilled positions, as well as 234 thousand bus and coach drivers and 30 thousand jobs unfilled. One third of current professional drivers are 55 years old or more. They are expected to retire in the coming years. In parallel, young people (25 years and below) represent only a very limited share of professional drivers (3% for buses and coaches, 7% for trucks). While the underlying causes for the shortage of drivers are related to many other issues which negatively affect the attractiveness of the profession, road transport operators report that the minimum age to obtain a driving licence presents an obstacle for some of out-of-school young people, considering that compulsory school obligation ends often at 16 years. Indeed, training curricula and/or waiting times for access to the driver profession appear significantly longer than for other professions.

According to EUROSTAT 2020 data, there are 545,000 out of school young people aged 16 or 17 years in the EU. It is not possible to assess the share of young people that would decide to become a professional driver but an estimate of 5% applied to young people out of school would result in 27,000 new drivers if the minimum age for category C/D was decreased to 16 years (respectively 13,500 for a minimum age of 17 years). While it cannot be concluded that the access to the profession due to long training and age limitations is one of the main underlying causes of the shortage of professional drivers, considering how critical the shortage of drivers is becoming and the likely effects on the functioning of the internal market, reducing the minimum age cannot be disregarded as a complementary measure that could contribute to mitigating the issue of driver shortage.

2.2.5 Problem driver 5: Holders of licences face difficulties to have their driving rights maintained or recognised in cross-border context due to inadequate or unnecessary procedures

The ex-post evaluation has shown that the current rules may not be adequate regarding certain specific aspects of the recognition or maintenance of driving rights. The open public consultation confirmed these findings, as removing obstacles to renewing, replacing or exchanging driving licences issued by EU/EEA Member States was perceived as extremely or very important to the respondents (4,428 out of 7,532 respondents, or about 58%). Also, removing of obstacles to renewing, replacing or exchanging driving licences issued by non-EU countries was considered as either extremely/very important (3,612 out of 7,532 respondents, or 48%) or important (1,818 out of 7,532 respondents, or 24%).

Firstly, the same issues apply regarding the national implementing rules to establish the normal residence of a person as for problem driver 4. It concerns a person unable to have a normal residence identified who is therefore not in a position to renew his or her driving licence in the event of a loss

[101] https://www.iru.org/resources/iru-library/driver-shortage-european-report-2022

or a theft. It concerns also persons having two or more normal residences who may abuse this situation to avoid the consequences of road traffic offences.

Secondly, the current rules provide the optional possibility for driving a motorcycle of category A1 with a licence of category B but the resulting rights are only valid on the territory of the State of issuance. Complaints addressed by citizens to the Commission and the European Parliament questioned the limitation, especially in case of two countries applying this same optional equivalence[102].

Thirdly, the mutual recognition of driving licences established by the DL Directive is strictly limited to physical documents. Digital transformation has improved the daily life of citizens and has become a tool for administrative simplification. Currently, five Member States[103] allow for the possibility to hold a driving licence in digital format. Many other Member States have initiated projects to deliver similar services. Under the current DL Directive, these digital licences are not mutually recognised and therefore remain valid on the territory of the issuing State only. A citizen with a digital driving licence wanting to drive in another Member State needs to carry the physical licence (card). In this context, citizens are not able to fully reap the benefits of the digital transformation. The same applies to administrations both when issuing driving licences and for the purpose of enforcement. 10 out of 18 respondents to the survey[104] among national authorities considered the fact that drivers cannot make use of their digital driving licence when driving on the territory of another Member State a problem. Only one respondent did not consider it a problem. Interviewed Member States[105] generally agreed that the lack of mutual recognition of mobile driving licences impacts the free movement of those EU drivers that currently hold one. According to two Member States[106], the fact of having to carry both a physical and digital driving licence when driving across the EU means that drivers have to bear additional costs. In the survey, 7 of the 22 respondents not belonging to national authorities considered the fact that drivers cannot make use of their mobile driving licence when driving on the territory of another Member State as an important problem and 4 of 22 respondents as a very important problem that imposes unnecessary administrative burden and costs on drivers.

Fourthly, as regards driving disqualifications in case the offender changes residence, the Court has held that outside of an explicit period of prohibition on applying for a new driving licence, if drivers change their normal residence and apply for a new driving licence, their new licence must be recognised in all Member States, and even in a Member State that imposed a driving disqualification on them previously[107]. Whether the condition of normal residence was fulfilled can only be assessed by the Member State of issuance. Therefore, other Member States can only refuse to recognise the validity of the new driving licence within their territory based on non-compliance with the normal residence criteria, if it is established based on entries on the driving licence or other indisputable information from the issuing Member State that such condition has not been satisfied[108].

Moreover, holders of EU driving licences who moved to overseas territories of EU Member States and hence changed their normal residence, are also often not able to drive in a Member State other

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[102] One example is the case of holders of category B licences being authorised to drive light motorcycles in Germany or Austria but only on the territory of the state that has issued the licences

[103] Poland, Portugal, Greece, Spain and Denmark

[104] COWI, Ecorys and NTUA (2022), Impact assessment support study

[105] BG, BE, NL, FR, SI, FI, DE

[106] BE, NL

[107] Case C-419/10, Hofmann, ECLI:EU:C:2012:240

[108] See for example: Case C-467/10, Akyüz, ECLI:EU:C:2012:112, paragraph 62

than the one the territory depends on because of the limitations of the driving licence issued by this overseas territory (e.g. Danes from Greenland who can only drive in Denmark and Greenland).

Finally, three types of issue concern driving licences issued by third countries

- The holder of a driving licence issued by a third country is subject to different rules, depending on the Member State where he/she establishes his/her residence in the EU. Indeed, in certain Member States, he/she may be able to obtain an EU driving licence by means of an administrative exchange while in others, he/she will have to pass the theoretical and practical tests. 11 of the 22 respondents from national authorities in the stakeholder survey considered the issue of third countries' driving licence holders who encounter difficulties in exchanging their licence in Member States as an important problem.
- EU driving licences issued in exchange of a third-country driving licence are marked with the harmonised Union code 70. This code restricts the rights of the holder in case he/she later establishes his/her residence in another EU Member State. The new Member State of residence may refuse to recognise and exchange the EU driving licence with a code 70[109]. In that case, the holder would have to pass the theoretical and practical tests to maintain his/her driving rights. During the workshop of 22 April 2022, most of the Member States and stakeholders have acknowledged that this hampers the free movement of persons while road safety is very unlikely to be at risk.
- A driver who passed the driving test in the EU may not be able to regain his/her EU driving licence if he/she leaves the EU, exchanges his/her EU driving licence for a foreign one and returns in an EU Member State other than the one where he/she passed the driving test. The current EU rules do not create an obligation on that Member State to consider the rights previously acquired in the EU. Consequently, these persons are likely to be required to pass the driving test again if an exchange is not possible. This problem has been raised several times in SOLVIT and has been confirmed by the competent authorities.

2.3 2.3 How likely is the problem to persist?

2.3.1 Problem 1: High number of unfit drivers on EU roads.

Without further EU level intervention, the high number of unfit drivers on EU roads is likely to persist. New vehicles will incorporate advanced safety technologies: from 7 July 2024, all new vehicles will be required to have certain safety technologies installed in accordance with the General Safety Regulation (Regulation (EU) 2019/2144). Other safety technologies will follow later (July 2026 / January 2029). Member States may adapt the content of the tests while remaining in compliance with the EU rules. However, without a general focus on these technologies, drivers' skills will be only partially adapted and drivers may lack training to safely operate them. In addition, by 2030, around 15% of the car fleet is projected to be equipped with automatic gear transmission, going up to over 90% by 2050. The current rules, relevant for a fleet mainly consisting of vehicles with manual gear transmission, will be rapidly outdated. While Member States may adopt certain simplifications applicable on their national territory to address this issue, these solutions may result in additional obstacles to the free movement of people and goods.

Moreover, the vehicle fleets will remain heterogeneous and the initially lower levels of automation will still require the driver's intervention in case of a risky road situation. The ageing of the population will on the one hand contribute to fewer fatalities due to the lower share of young drivers in the

[109] Usually the exchange is possible only if the new state of residence exchanges driving licences issued by the concerned third country.

overall driver population, but on the other hand it will likely result in an increase in the number of drivers that are physically or mentally unfit to drive.

Finally, in absence of further EU level intervention, the behaviour of drivers will not significantly improve. The number of offences committed abroad will likely decrease by 2040 due to the gradual introduction of new safety features in the vehicle fleet, based on the General Safety Regulation[110]. However, as the effect of the introduction of new safety features in the vehicle fleet is expected to peter out by 2040, the number of detected offences is projected to increase again post-2040. Member States could in theory establish bilateral or multilateral frameworks for the mutual recognition of driving disqualifications or simply rely on information exchanged within RESPER to enforce sanctions on holders of a driving licence issued by their authorities when an offence is committed abroad. However, the set-up would be sub-optimal, notably because of the complexity to achieve a complete European geographical coverage and the risk of different rules and rights applicable to drivers. In the past, multiple Conventions (1964, 1976) tried to address the issue in the framework of the Council of Europe. However, they were not ratified by enough Member States to result in a significant impact.

In this context, the number of fatalities is projected to decrease by 3% by 2030 relative to 2020 (15% reduction for 2020-2050) and the number of serious injuries to remain relatively stable by 2030 (10% decrease for 2020-2050). Neither the 50% reduction of fatalities by 2030, nor zero fatalities on European roads by 2050 will be achieved.

2.3.2 Problem 2: Barriers to the free movement of people due to inadequate or unnecessary procedures for driving licences.

Without further EU level action, applicants will continue to experience difficulties in obtaining their driving licences in Member States other than the Member State of origin, due to the barriers and extra costs related to the knowledge of the local language when taking a driving exam in another Member State, to different medical fitness practices and to different requirements by Member States for accessing driving licences. The problem is expected to persist also in relation to the establishment of normal residence and the misalignment of the provisions related to automated transmission and to the maximum mass of vehicles that can be driven with a category B licence, given the increasing number of electric vehicles that are generally heavier.

In addition, holders of driving licences will likely continue to see their driving rights limited because of the lack of mutual recognition of certain rights entrusted by driving licences, and the additional costs they have to bear when moving to another Member State, resulting from the change of administrative validity periods and the need for additional medical fitness checks. Holders of driving licences will likely also continue to experience difficulties renewing or exchanging their driving licences in other Member States due to divergent interpretations of ‘normal residence’ and the lack of a uniform approach to check ‘normal residence’ across Member States.

The number of Member States issuing mobile driving licences is expected to increase over time. Without further EU level action, drivers holding mobile driving licences will however not be able to fully benefit from the advantages as the validity of the digital licence will be limited to the territory of the Member State issuing it. Drivers will therefore continue to see their freedom of movement restricted in case they only carry a digital driving licence.

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[110] Regulation (EU) 2019/2144

Finally, regarding the shortage of professional (bus, coach and truck) drivers, the current rules on minimum age result in an earliest entry into the profession at 18 years.

With costs remaining an obstacle to the modal shift away from road operations and the automation of vehicles, it is expected that the shortage of professional drivers will remain a relevant issue in the long term. This trend is confirmed by the increase in traffic as illustrated in the Staff Working Document accompanying the Sustainable and Smart Mobility Strategy (section 5)[111] and the increase of the demand for commercial road transport reported by IRU[112].

2.3.3 Foresight

The analysis incorporates throughout all its dimensions relevant foresight tools. It does so to anticipate trends and issues that may affect the initiative and build a robust, future-proof evidence base for its likely impact. Megatrends[113] and strategic foresight report findings[114] are used throughout the problem definition, baseline, policy objectives and options sections of the document.

The megatrend "Accelerating technological change and hyperconnectivity" will affect significantly the problem affecting road safety with the progressive introduction of automation and connectivity in the sector of road transport. International policy work is still on-going regarding automated driving, in particular in the context of the UN Economic Commission for Europe[115]. The ex-post evaluation has identified the need to update the standards on skills and knowledge to be met in order to obtain a driving licence. Moreover, the 2022 Strategic Foresight Report points to the potential of future digital technologies to render road transport more efficient and sustainable, if used properly[116]. For example, the use of data from vehicles and their environment can optimise charging. This in turn requires training driving licence holders to use new technologies as they reach the market.

Another megatrend that impacts how the problems will likely evolve is "Shifting health challenges". As Europeans are living longer and healthier lives, the challenges that come with it affect their fitness to drive at different ages. This has been taken into account in the analysis in the following sections.

Finally, the significance of migration is changing too. In 2020, an estimated 281 million people were living outside their country of birth worldwide.[117] As their numbers are higher than ever and continue to grow, the problems related to obtaining or exchanging driving licences outside one's country of origin will continue to persist and possibly worsen.

3 3 WHY SHOULD THE EU ACT?

3.1 3.1 Legal basis

Title VI (Articles 90-100) of the Treaty on the Functioning of the EU (TFEU) establishes the EU's prerogative to make provisions for the Common Transport Policy. Article 91(1)(c) TFEU provides that the European Union has competence in the field of transport to lay down measures to improve

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111 EUR-Lex - 52020SC0331 - EN - EUR-Lex (europa.eu)
112 Europe driver shortage to triple by 2026 if no action: new IRU report | IRU | World Road Transport Organisation
113 https://knowledge4policy.ec.europa.eu/foresight/tool/megatrends-hub_en
114 https://ec.europa.eu/info/strategy/strategic-planning/strategic-foresight_en
115 https://unece.org/automated-driving#accordion_3
116 COM(2022) 289 final.
117 https://knowledge4policy.ec.europa.eu/increasing-significance-migration_en

transport safety, while Article 91(1)(d) TFEU provides the same competence as regards "any other appropriate provisions".

It is the longstanding practice of the Court that the European Union enjoys broad legislative powers within the remit of the common transport policy[118] , and most of the policy measures clearly fall within the scope of this competence. However, in the case of mutual recognition of driving disqualifications (PM 4), additional legal examinations were carried out in order to determine whether Article 91(1) TFEU is the correct legal basis to adopt such measure on. It was concluded that Article 91(1) TFEU can be considered the correct legal basis, as long as the conduct is considered an offence, which is sanctioned with driving disqualification in both the Member State of the offence and the Member State of the normal residence (principle of 'dual disqualification'). Furthermore, the legal examination concluded that it is not possible to use a dual legal basis, i.e. common transport policy legal basis together with the legal basis contained within Title V of Part Three of the TFEU (judicial and police cooperation).

3.2 3.2 Subsidiarity: Necessity of EU action

Under the principle of subsidiarity, in areas which do not fall within its exclusive competence, the EU shall act only if and in so far as the objectives of the proposed action cannot be sufficiently achieved by the Member States. Matters related to driving licences contain transnational aspects that cannot be covered by individual Member States alone. While the DL Directive represents an important step in the process of harmonising the rules on driving licences and contributes to the implementation of Union policies, it has so far been amended eleven times to harmonise common standards and requirements, as well as to adapt the rules to the scientific and technical progress that has occurred since 2006. The Directive's 2022 ex-post evaluation has identified the need for its thorough review to ensure that all elements are in place to fulfil the policy objectives.

In light of the EU targets on road safety and the insufficient progress projected in reducing road fatalities and serious injuries', further EU action is needed to deliver on the set targets. For example, the fight against dangerous behaviour on roads can only deliver fully in case non-resident road traffic offenders face the same sanctions for their conduct as residents.

EU level action is needed also to remove unnecessary and unjustified barriers to the free movement of people due to inadequate procedures for issuing and renewing driving licences. These problems need to be addressed at EU level because they have a cross-border dimension. A prominent example are the mobile driving licences which can only be mutually recognised across the EU if the solutions used by Member States are interoperable.

3.3 3.3 Subsidiarity: Added value of EU action

The 2022 ex-post evaluation underlined the added value of the DL Directive, particularly in terms of its effectiveness and efficiency. The Directive is found to have had a positive effect on road safety, the free movement of EU citizens, the reduction of driving licence fraud and of driving licence tourism, and it also led to a reduction of the administrative burden, in particular for driving licence holders.

Without EU intervention, cooperation on driving licences between Member States would have continued probably via bi- or multilateral agreements which, in turn, would probably have resulted in higher

[118] Case C-223/02, *Spain and Finland* v *Parliament and Council*, ECLI:EU:C:2004:497, paragraph 29 and the case law cited there.

complexity of the licensing system and a higher administrative burden for the licence holders. Administrative issues may also have been faced by drivers when travelling to Member Statesthat are not Contracting Parties to the Vienna Convention[119], for example the requirement to hold an international driving permit. Finally, when changing residence in the EU, holders of EU driving licences would have to obtain a new driving licence issued by their new country of residence, either by means of an administrative exchange or by passing the driving test like any other applicant.

Similarly, in the absence of EU action only multi- and bilateral agreements between the Member States could be applied to enable mutual recognition of driving disqualifications of non-resident drivers. However, despite the relatively broad support shown by the stakeholders for mutually recognising the driving disqualifications of the perpetrators of offences that are usually punishable with a disqualification in the EU (e.g. driving under the influence), only one such existing agreement currently in force was identified[120]. This in turn means, that there are no driving disqualifications for committing even the most serious road traffic offences in other EU countries, if the decision is not taken by the Member State which issued the driving licence.

In the absence of EU intervention, the integration of foreign professional drivers in the EU road transport sector will remain limited because of administrative difficulties for foreign drivers to maintain their driving rights. Removing this barrier could contribute to solving the driver shortage issue in the EU together with other actions, for example in relation to driver qualifications.

4 4 OBJECTIVES: WHAT IS TO BE ACHIEVED?

4.1 4.1 General objectives

In view of the problems identified in Section 2.1, the initiative should improve road safety and facilitate the free movement of persons in the European Union. It should also contribute to sustainable road transport and to its digital transformation as well as support Sustainable Development Goals *"making cities and human settlements inclusive, safe, resilient and sustainable"*[121] and in particular *"by 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons"*[122].

4.2 4.2 Specific objectives

The specific objectives (SOs) and their correspondence with the problem drivers are presented in Figure 3.

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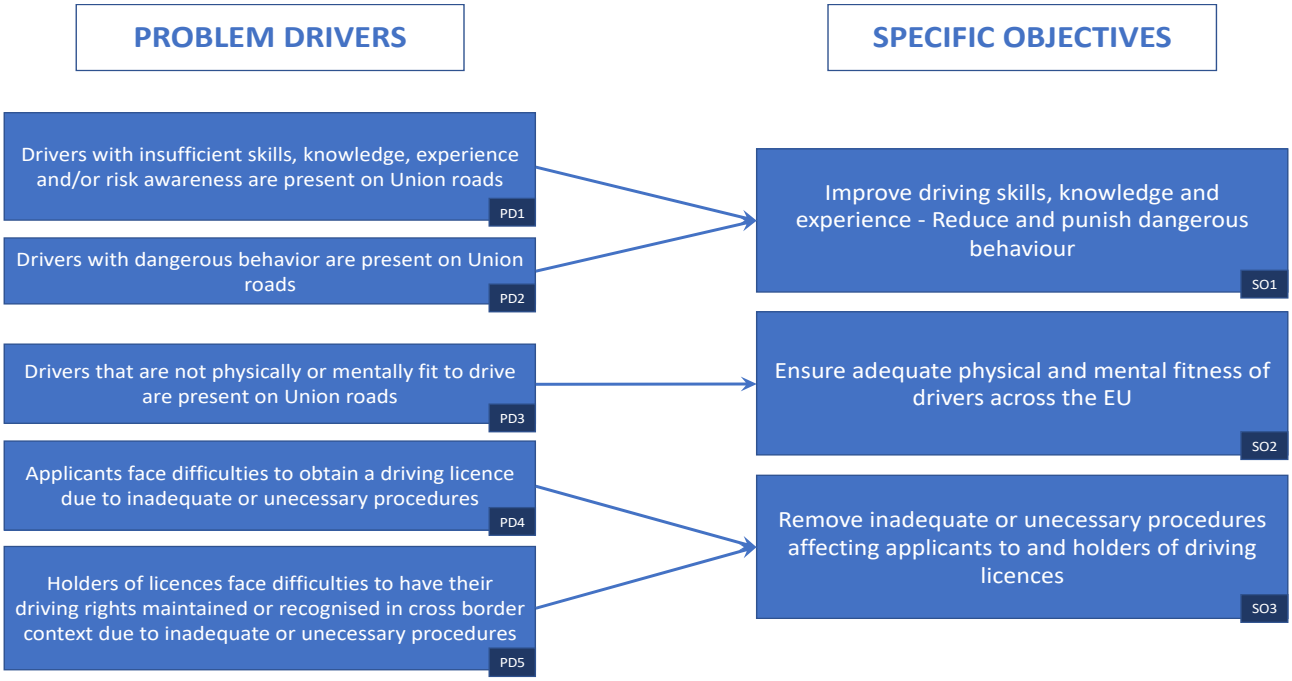
[119] Spain, Malta, Cyprus and Ireland

[120] Agreement on the Mutual Recognition of Driving Disqualifications between Ireland and the United Kingdom of Great Britain and Northern Ireland (signed in Dublin on 30 October 2015; entered into force on 1 August 2017): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/680101/TS_24.2017_CM_9544_WEB_UK_Ireland_Driving_Disqual.pdf

[121] Goal #11 of the UN 2030 Agenda for Sustainable Development https://sdgs.un.org/2030agenda

[122] Target 11.2 of the UN 2030 Agenda for Sustainable Development https://sdgs.un.org/2030agenda

Figure 3: Correspondence between the problem drivers and the specific objectives



SO1: Improve driving skills, knowledge and experience, and reduce and punish dangerous behaviour. This specific objective addresses problem drivers 1 and 2. The rules on driver training, testing and probation have to ensure that especially young and novice drivers obtain the skills, knowledge, experience and risk awareness needed to drive safely. Also, all drivers should benefit from improved skills and knowledge on advanced technologies, using the safety and environmental potential of innovation to the full extent, as well as on ensuring a safe coexistence of motorised traffic and active modes. Drivers should be held accountable for their dangerous driving behaviour in all Member States, in order to create an environment conducive to improving road safety.

SO2: Ensure adequate physical and mental fitness of drivers across the EU. This specific objective addresses problem driver 3. Rules concerning physical and mental fitness to drive for non-professional drivers have to be improved and updated to the latest technological development. In addition, the medical screening process across the EU should be better aligned to contribute to the delivery of the road safety targets.

SO3: Remove inadequate or unnecessary barriers affecting applicants and holders of driving licences. This specific objective addresses problem drivers 4 and 5. Notwithstanding the current levels of harmonisation, a number of barriers still persist related to drivers' access to licences and to the recognition of their driving rights, which in turn hinder freedom of movement in the EU: difficulties with the driving tests resulting from the knowledge of languages, different rules to determine normal residence for the residents in the EU or absence of continuity of certain driving rights when travelling and when changing residence in the EU. In addition, further harmonisation e.g. with regard to the validity of the driving licence and of mobile driving licences should be introduced.

5 5 WHAT ARE THE AVAILABLE POLICY OPTIONS?

5.1 5.1 What is the baseline from which options are assessed?

The EU Reference scenario 2020 (REF2020) is the starting point for the impact assessment of this initiative. The REF2020 takes into account the impacts of the COVID-19 pandemic on the transport sector. More detailed information about the preparation process, assumptions and results are included in the Reference scenario publication[123]. Building on REF2020, the baseline scenario for this impact assessment has been designed to include the initiatives of the 'Fit for 55' package proposed by the Commission on 14 July 2021. The baseline assumes that there is no further EU level intervention beyond the current Diving Licence Directive. More details on the baseline scenario are provided in Annex 4. The baseline scenario is common with that of the impact assessment accompanying the revision of the Directive (EU) 2015/413 on facilitating cross-border exchange of information on road-safety-related traffic offences, to ensure consistency.

The baseline also incorporates foresight megatrends[124] (see section 2.3.3) and developments captured in the 2022 Strategic Foresight Report.[125] Among others, it captures the trend of increasing demand for transport as population and living standards grow, the links between digital technologies and greening road transport by making it more efficient, and the shift towards zero-emission vehicles, etc.

The baseline scenario assumes the achievement of the milestones of the Sustainable and Smart Mobility Strategy[126] in terms of using more sustainable transport modes, thus reflecting in a stylised way other initiatives that are currently in preparation. Nevertheless, this still implies an increase in the road transport activity by 2030 and 2050 relative to the current levels.

In the baseline scenario, the number of fatalities is projected to decrease by 23% by 2030 relative to 2015 and by 30% by 2050 relative to 2015[127]. The number of serious and slight injuries is projected to decrease at a lower rate (by 18% between 2015 and 2030 and by 25% for 2015-2050). This is despite the increase in traffic over time. Relative to 2020, the number of fatalities and slight injuries is projected to decrease by 3% by 2030 while the number of serious injuries is projected to remain relatively stable. The lower growth rates in relation to 2020 reflect the impact of the COVID-19 pandemic. By 2050, the number of fatalities would be 13% lower relative to 2020 while the number of serious injuries would be 10% lower and that of slight injuries 11% lower. In particular, the number of fatalities in which novice drivers driving a car are involved are projected to increase by 3% until 2030 (to around 3,900) and to then decrease to around 3,400 by 2050 (i.e. an overall 10% decrease for 2020-2050). This is because, despite the fact that novice drivers are more prone to accidents, the ageing of the population will lead to a decrease in the share of young drivers in the overall driver population. In the baseline scenario, the targets of the *EU Road Safety Policy Framework 2021-2030 – Next steps towards "Vision Zero"* of reducing the number of road deaths by 50% between 2020 and 2030 as well as reducing the number of serious injuries by 50% in the same period, would not be met. In addition, this is still far from the goal of the *Sustainable and Smart Mobility Strategy* of a close-to-zero death toll for all modes of transport in the EU by 2050.

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[123] EU Reference Scenario 2020 | Energy (europa.eu)
[124] https://knowledge4policy.ec.europa.eu/foresight/tool/megatrends-hub_en#explore
[125] COM(2022) 289 final.
[126] EUR-Lex - 52020DC0789 - EN - EUR-Lex (europa.eu)
[127] Projections refer to injuries in which a passenger vehicle, a light commercial vehicle, a bus or a truck is involved (power two wheelers are not included in the projections).

The number of driving licences (A to D categories) is projected to increase by around 5% by 2030 relative to 2019 (from around 250 million in 2019 to 263 million licences in 2030) and to remain relatively stable by 2050 (at around 260 million in 2050). Without further EU level action on the mutual recognition of mobile driving licences, the physical licences are projected to remain dominant in the EU by 2050. Indeed, while most of the Member States are likely to implement mobile driving licences, they would remain valid only on the territory of the State issuing them. To travel abroad within the EU, drivers would still have to keep their physical driving licences.

In the baseline scenario, the number of theoretical and practical driving tests is projected to increase by 7% by 2030 (from 21.2 million in 2019 to 22.7 million in 2030) and by 12% by 2050 (at around 23.8 million), relative to 2019. The costs associated to the theoretical and practical driving tests would go up from EUR 1.47 billion in 2019 to EUR 1.55 billion in 2030 and EUR 1.64 billion by 2050.

The total number of offences committed by drivers in foreign registered vehicles is aligned with those used in the impact assessment supporting the revision of the CBE Directive as there should be no difference between the numbers of detected speeding and drink-driving offences as regards whether they are detected for the purposes of the CBE Directive (i.e. to issue financial penalties) or to pursue the cases and issue a driving ban. In the case of the impact assessment supporting the revision of the CBE Directive however, the relevant number of offences are the ones that are connected to remote detection. For the purpose of this impact assessment, all the offences which are detected are relevant, regardless of the method of detection, as long as they reach a level of seriousness that leads to a driving disqualification under the law of the Member State that detected the offence.

The number of EU exchanged licences would increase by 3% by 2030 and 4% by 2050, while the number of third country exchanged licences are projected to go up by 2% by 2030 and 7% by 2050. Without further EU level intervention, holders of foreign driving licences (including EU citizens) will likely continue to see their driving rights limited. Indeed, the restrictions when moving to another Member State will remain applicable to them. The Russian aggression of Ukraine is not expected to have an impact on the baseline. In particular, its possible effects in relation to driving licences have already been addressed and mitigated through Regulation (EU) No 2022/1280[128].

5.2 5.2 Description of the policy options

As a first step, a comprehensive list of possible policy measures was established after extensive consultations with stakeholders, expert meetings, independent research and the Commission's own analysis. This list was subsequently screened based on the likely effectiveness, efficiency and proportionality of the proposed measures in relation to the given objectives, as well as their legal, political and technical feasibility.

5.2.1 Discarded policy measures

Not taking action has been discarded, considering the need to adapt the current rules to technological, societal and scientific developments. Among others, the current framework on driving licences does not allow for accommodating mobile driving licences. Consequently, it is becoming a barrier to the digital transformation, including the significant benefits it can bring in terms of cost savings and simplification. Several possible policy measures were also considered during the impact assessment process but were discarded because proposing an action to address the issue at EU level would not

[128] OJ L 195, 22.7.2022, p. 13.

yield additional results. Further details on the discarded policy measures and the reasons for discarding them are set out in Annex 5.

5.2.2 Retained policy measures

The retained policy measures have been grouped in 3 policy options: policy option A (PO-A), policy option B (PO-B) and policy option C (PO-C). Table 1**Table 1** presents the list of policy measures included in the policy options with the problem drivers and specific objectives. A more detailed description of the policy measures is included in Annex 6.

All three policy options include 12 common policy measures ("PMc") that are presented in Table 1. These policy measures reflect the necessary changes due to technological, scientific and societal evolutions in the EU and will be included in each policy option.

Table 1: Overview of policy measures common to the three options

Policy measure	Problem Driver	Specific objective
PMc 1: Update of standards on skills and knowledge to be met for the first issuance of a driving licence.	PD1	**SO1**
PMc 2: Introduction of rules to remove restrictions associated to automatic gear transmission.		
PMc 3: Amendments to the definitions of vehicle categories for cars and vans (maximum mass)		
PMc 4: Improvement of RESPER for the purpose of enforcement	PD2, PD4 PD5	**SO1** **SO3**
PMc 5: Update of standards on physical and mental fitness to be met for the issuance of driving licences	PD3	**SO2**
PMc 6: New rules on the use of technologies to mitigate medical unfitness		
PMc 7: Establishment of a knowledge management platform for authorities regarding physical and mental fitness to drive		
PMc 8: Clarification of the concept of normal residence	PD4 PD5	**SO3**
PMc 9: Introduction of an EU mobile driving licence	PD5	
PMc 10: Introduction of a possible QR code on the physical licence in the areas reserved for microchip		
PMc 11: Improvement and simplification of rules on administrative validity.		
PMc 12: Mutual recognition of optional equivalences – New equivalence applicable to small bus combined with a trailer		

Table 2 includes the additional policy measures for PO-B (7) and PO-C (13). These policy options represent an additional level of ambition and scope, as explained below.

Table 2: Overview of policy measures not common to the three options

Policy measure	Problem Driver	Specific objective	Option B	Option C
PM 1: Rules on training and probation periods - Recommendation on lifelong training	PD1 PD2	**SO1**	**X**	**X**
PM 2: Amendments to the definition of the mopeds' category to include certain micro mobility means	PD1	**SO1**		**X**
PM 3: Introduction of a new category for tractors - amendment to the definition of the small bus category				**X**
PM 4: Mutual recognition of driving disqualifications	PD2	**SO1**	**X**	

Policy measure	Problem Driver	Specific objective	Option B	Option C
PM 5: Rules on consequences of penalty points for non-residents - Rules on rehabilitation in case of a change of normal residence				**X**
PM 6: Rules on simple medical screening	PD3	**SO2**	**X**	
PM 7: Rules on advanced medical screening				**X**
PM 8: Removal of the staging requirement to obtain a licence of category CE or DE	PD4	**SO3**	**X**	**X**
PM 9: Flexibility for the first issuance of driving licences in case of restrictions related to languages			**X**	**X**
PM 10: Mutual recognition of physical and mental assessment	PD4 PD5			**X**
PM 11: New optional equivalence related to vehicles with limited maximum speed	PD5		**X**	**X**
PM 12: Rules on the removal of code 70				**X**
PM 13: New optional equivalence related to bus without passengers				**X**
PM 14: Rules on the exchange of foreign driving licences.			**X**	**X**

5.2.3 Description of the options

Three policy options (PO-A, PO-B and PO-C) have been designed to address all problem drivers identified in relation to road safety and to the free movement of persons. All options contribute to the general objectives by removing obstacles for applicants and for holders of driving licences, and by reducing the number of road traffic accidents.

PO-A reflects the basic update of the Directive, taking into account the lessons learnt from the evaluation and integrating societal, technological and scientific evolutions. It does not change the scope of the Directive and it contains measures which are also included in PO-B and PO-C.

PO-B includes additional efforts to meet EU road safety objectives, targeting all drivers (including novice drivers) in three important domains: skills and knowledge, medical fitness and dangerous behaviour. It also removes some barriers on the free movement of persons faced by holders of foreign licences and applicants.

Finally, PO-C reinforces the road safety measures introduced with PO-B regarding medical fitness and dangerous behaviour. It also extends the scope of the Directive to new vehicles (tractors, e-scooters with a maximum speed of 25 km/hour).

<u>Policy option A</u>

Policy option A (PO-A) includes policy measures that are common to all three policy options. The measures under PO-A aim at aligning the Directive on driving licences to the technological, scientific and societal developments in the EU. While the current scope of the Directive remains the same, improvements are brought to its main provisions answering to the market needs and opportunities.

PO-A will contribute to road safety. To address Specific Objective 1 "*Improve driving skills, knowledge and experience and reduce and punish dangerous behaviour",* the range of issues subject to testing will be extended, in particular to check drivers' knowledge of new vehicle features and to introduce hazard perception tests (PMc1).

In addition, improvements to RESPER (the network for the exchange of information related to driving licences) will support further cooperation between issuing authorities, in particular in relation to law enforcement, and thereby better fight against fraud and dangerous behaviour (PMc4). For that purpose, requirements on the response time and data quality of RESPER will be introduced and the use cases will be better specified in order to avoid legal uncertainty. It will result in a system relevant to support the control of driving licences.

PO-A will also ensure adequate levels of skills and knowledge to accompany the uptake of zero-emission vehicles. Today's driving licence rules reflect the fact that the EU vehicle fleet still uses predominantly conventional fuels. The rules will be updated to take into account the increased uptake of alternatively fuelled vehicles with automatic gear transmission (PMc2) and the excess of mass resulting from electric vehicles' propulsion systems (PMc3).

In addition, to support Specific Objective 2 "*Ensure adequate physical and mental fitness of drivers across the EU*", the standards on physical and mental fitness to be met by applicants (PMc5) and the rules on the use of technologies to mitigate unfitness to drive (PMc6) will be updated in line with technological and scientific developments[129]. Also, a new dedicated information platform will be established to allow for wider sharing of information and to improve knowledge management between authorities by means of annual meetings (PMc7).

Furthermore, to support specific objective 3 "*Remove inadequate or unnecessary barriers affecting applicants and holders of driving licences"*, the same administrative validity of driving licences for category A and B (non-professional) should be applied in all MS. The issue of <u>validity periods for licences</u> is resulting from the possibility for Member States to select two durations (10 or 15 years). When a person changes normal residence and asks for an exchange of driving licences, the administrative validity of his or her driving rights may be reduced. This poses a problem for the free movement of people by setting unnecessary administrative barriers to the holders of EU driving licences, and the objective here is to remove the barriers related to the recognition of their rights (SO3). Measure PMc11 (Improvement and simplification of rules on administrative validity) will simplify the procedure for the citizens currently holding a driving licence of 10 years' administrative validity. Lessons learned from the COVID-19 pandemic will also be considered and authorities could waive requirements on administrative validity in exceptional circumstances. Optional equivalences[130] will be mutually recognised (PMc12). Specific implementing rules will be introduced to develop the concept of normal residence which will specify how the normal residence should be determined during the six first months of establishment in a new country, including special cases where two or more Member States consider they can be issuing authority. (PMc8), in particular to avoid that a person is not able to have his or her normal residence determined. Additional equivalence will be introduced allowing the holder of a licence of category D1 and CE to drive a small bus with a trailer (PMc12).

Finally, the free movement of persons will be ensured also in the digital era, through the introduction of the EU mobile driving licence (PMc9). In parallel, it will be possible to add a QR code on physical driving licences to improve security of documents. It will allow administrations, law enforcement and potentially private bodies to verify the authenticity of the information printed on the driving licences (similar mechanisms as for the EU covid certificate). It will also reduce costs compared to the chipset currently foreseen under the existing Driving Licence Directive (PMc10).

<u>Policy option B</u>

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[129] For example alcohol interlocks in case of dependence to alcohol or potentially in the future certain ADAS technologies to offset the consequences of Mild Cognitive Impairments.

[130] For example, if a person is authorised to drive a light motorcycle with a licence of category B in his or her country of residence, he or she will be able to do the same in any other MS that has applied the same optional equivalence

Policy option B (PO-B) represents an increase of policy intervention as regards road safety, as well as the reduction of administrative burden affecting professional drivers, holders of foreign driving licences, EU citizens not fluent in the language of their state of residence and young persons in remote areas.

Regarding Specific Objective 1 "*Improve driving skills, knowledge and experience and reduce and punish dangerous behaviour",* besides the measures included in PO-A, new rules on training and probation periods will ensure that novice drivers are better prepared for driving safely in complex traffic situation. Lifelong training will be promoted to keep the skills of experienced drivers up to date, also in the advent of new technologies (PM1). Moreover, road safety is expected to be further improved also by introducing the mutual recognition of driving disqualifications for major road safety-related offences (such as driving under the influence of alcohol) (PM4).

Regarding Specific Objective 2 "*Ensure adequate physical and mental fitness of drivers across the EU"*, in addition to the updated standards on physical and mental fitness to be met by applicants and drivers introduced under PO-A, a simple fitness screening based on a self-assessment will become mandatory at first issuance and at renewal together with the possibility for more frequent screening of drivers' medical fitness for drivers above 70 years old. A training programme to support general practitioners will be set up to support the introduction of these new screening rules (PM6).

In relation to Specific Objective 3 "*Remove inadequate or unnecessary barriers affecting applicants and holders of driving licences",* in addition to the measures under PO-A, the issuance of the driving licence document will be simplified.

Applicants who are EU nationals will be able to obtain their first driving licence of category B either in their country of residence or in their country of citizenship in the event their country of normal residence does not allow interpreters and their native language is not available for test there (PM9). This will be possible due to the adaptation of the rules on normal residence and it will address the problems faced by persons not sufficiently at ease with the official languages of their country of residence. This measure has been designed by considering the risk of fraud (driving licence tourism). It is therefore limited to cases where the set-up related to test languages can be problematic, and limited to category B licences.

To mitigate the shortage of professional drivers, existing rules on bus and truck drivers would be simplified, to enable more flexibility between these professions (PM8). The measure will remove the requirement to hold a driving licence of category C (truck) or D (bus) to obtain a driving licence of category CE or DE (same vehicles but with a trailer) (PM8).

Rules on the exchange of driving licences issued by third countries applying licensing schemes of similar performance as the EU will be introduced (PM14). They will allow holders of driving licences issued by the third country whose licensing system guarantees a level of road safety equivalent to the one in the EU to obtain an EU driving licence by means of an administrative exchange. The driving licences issued in that context will not be marked with the harmonised Union code 70. This right will be also be provided to holders of licences issued by third countries who have previously obtained a driving licence following a test in the EU (e.g. an expatriate returning to the EU). In addition, Member States will keep the bilateral competence to determine other third countries with which an administrative exchange is possible, as it is the case now.

Finally, to cater for mobility issues in remote areas, it will be possible for Member States to extend driving rights of the holder of a B1 driving licence by allowing them to drive vehicles of a higher mass with a maximum speed up to 45 km/h, but only on the national territory of the relevant Member States (PM11).

Policy option C

Policy option C (PO-C) represents a further increase in harmonisation and scope compared to option PO-B, notably by introducing rules on the recognition of penalty points for non-residents, by requiring a driving licence for micro mobility vehicles with a speed beyond 25 km/h and by laying down rules on the mutual recognition of a physical and mental fitness assessment.

On Specific Objective 1 "*Improve driving skills, knowledge and experience and reduce and punish dangerous behaviour",* the mutual recognition of driving disqualifications will be reinforced and complemented by rules on penalty points' systems and rehabilitation (PM5). Furthermore, the categories of vehicles for which a driving licence is required would be amended to include new smart mobility vehicles of a maximum speed between 25 and 45 km/h (PM2). This issue is mainly related to problem driver 1 (insufficient skills, knowledge, experience and/or risk awareness) and it is due to an increasing use of e-scooters and other forms of micro-mobility in cities, resulting in an increase of accidents affecting their users. Stakeholders' consultations and desk research[131] have underlined that users of these vehicles are exposed to similar risks as other vulnerable road users (i.e. cyclists and moped riders). It has also been noted that the risk profile of certain micro mobility means can be very similar to the one of mopeds, especially when the design speed is between 25 and 45 km/hour. Consequently, the drivers of these vehicles will be subject to tests similar to the ones for mopeds (category AM), ensuring a minimum level of driving skills and knowledge of the road traffic rules. Finally, the mutual recognition of national licences required to drive agricultural vehicles will be introduced to solve problems faced by cross-border farming activities, and the definition of category D1 (for small buses) will be updated (PM 3) by increasing the number of authorised passengers from 16 to 22 in order to better align it with the market opportunities and needs. Regarding tractors, licences for agricultural or forestry tractors are governed at national level. Consequently, there is no mutual recognition resulting in obstacles affecting notably posted workers, agricultural contractors and cross-border agricultural activities. Regarding small buses, the definition of the category D1 includes buses of a maximum length of 8 meters with 9 to 16 passenger seats. The ex-post evaluation has identified that the current market supply provides for buses of such dimension with up to 22 passenger seats.

Regarding Specific Objective 2 "*Ensure adequate physical and mental fitness of drivers across the EU"*, option PO-C requires that the mandatory screening of medical fitness at first issuance or renewal be carried out by a general practitioner and it foresees more frequent screening of drivers' medical fitness from the age of 65 years and onwards. A training programme to support general practitioners will be set up to support the introduction of these new screening rules (PM7).

In relation to Specific Objective 3 "*Remove inadequate or unnecessary barriers affecting applicants and holders of driving licences",* in addition to the measures under policy option B, the mutual recognition of physical and mental fitness assessment (PM 10) will be introduced as a consequence of the harmonised medical screening. In addition, former holders of driving licences issued by a third country should be able to continue to drive when changing their residence to another Member State, provided they have a positive road safety track record of at least 5 years (PM12). For that purpose, the initiative will specify that the restrictions associated to code 70 will not apply once these conditions are met.

Finally, rules relevant to professional drivers will be further simplified, allowing MS to authorise the holder of a driving licence of category C (truck) to drive a bus without passengers on their territory. This will mainly affect employees in charge of maintenance and the repair of buses and trucks and

[131] https://www.itf-oecd.org/sites/default/files/docs/safe-micromobility_1.pdf

with the measure, the workers will not have to obtain the licences for both trucks (category C) and buses (category D) (PM13).

All policy options fully encompass the ***'digital by default' principle***, reflecting the 2030 Digital Compass Communication.[132] They enable smooth digital policy implementation and foster digital transformation, as they have been designed with digitalisation as the first-best option, where available. For example, mobile driving licences have the end user at the centre of digitalisation, will be issued by default from 2028 and will be interlinked with the EU Digital Identity Wallet,[133] the use of RESPER ensures interconnectivity for MS authorities, while training and testing of drivers' knowledge of ADAS systems levers digital and technological innovation to improve road safety.

5.2.4 Main trade-offs

To identify the measures which may require trade-offs between the objectives, measures with a likely negative impact on road safety while having positive impact on green transition, free movement of persons and administrative simplification, have been considered. Multiple consultation activities have been conducted to confirm for each of these measures the problem driver they would address and to identify potential mitigation actions, in particular when similar provisions exist at national level.

When no mitigation action was available to control the negative impact on road safety, or when the risk of negative impacts on road safety was considered too high, the measures have been discarded. This applies for example to measures such as reducing the minimum age required for obtaining a driving licence, removal of the graduated access scheme for category A licences and removal of code 70 (see also Annex 5 on discarded measures).

The analysis of the main trade-offs has been performed for the cases discussed below: regarding the rules on driving vehicles with automatic gear transmission, increase of vehicles' mass due to the transition to alternative fuels, optional equivalence in case of vehicles with limited speed and the minimum age requirement to drive.

Regarding **the rules applicable to vehicles with automatic gear transmission**, and related possible trade-offs between green transition and road safety, it should first be underlined that the skills and knowledge required to drive cover both the control of the vehicle and behaviour in traffic. This is reflected in the skills to be assessed during the driving test, as specified in Annex II to the Directive. During the consultation activities and in particular the first workshop, it has been underlined that the easiness to operate vehicles with automatic transmission allows for better results regarding behaviour in traffic of novice drivers having passed the test with automatic gear transmission.

Measure PMc 2 (Introduction of rules to remove restrictions associated to automatic gear transmission) has been designed in a way to avoid negative effects on road safety. Therefore, an additional certified training or a short practical test would be required to remove the restrictions on drivers having passed the test on a vehicle with automatic gear transmission (licences marked with code 78). It will focus on the skills and knowledge specific to manual gear transmission. A similar scheme is already in place in Germany with an effect limited to its national territory, and the competent authority has not reported specific road safety issues with its implementation.

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[132] Commission Communication, 2030 Digital Compass: the European way for the Digital Decade, COM(2021) 118.

[133] Regulation of the European Parliament and of the Council amending Regulation (EU) No 910/2014 as regards establishing a framework for a European Digital Identity.

Regarding **the increase of vehicles' mass resulting from the shift to alternative fuels**, and the related possible trade-off between green transition and road safety, category B driving licences includes vehicles with a maximum mass up to 3.5 tons, according to the Directive. Battery technologies have significantly evolved during the last years. The weight of electric cars remains now on average below 2 tons[134]. Consequently, vans are the vehicles for which the shift to alternative fuels would require a higher category of driving licences. The total number of vans in the EU was about 29 million in 2020, while the alternatively fuelled vans accounted for only 1.9% of all vans on the road[135]. In addition, new vehicles are required by the General Safety Regulation[136] to be equipped with advanced safety technologies (such as advanced driving assistance systems), which will significantly improve road safety[137].

The increase of the maximum mass for category B to 4.25t (PMc 3) is therefore expected to have a very limited negative impact on road safety, mainly because of a higher risk for other vulnerable road users compared to lighter vehicles. Indeed, the expected negative effect resulting from a higher mass will be largely mitigated by the scope of application of the measure (only alternatively fuelled vehicles) and the fact that almost all the vehicles concerned will benefit from advanced technologies regarding road safety.

Regarding **the minimum age requirements to drive**, and related possible trade-offs between simplification and road safety, two measures are likely to increase the presence of young drivers on the road:

- With the introduction of rules on accompanied driving (PM 1), applicants to licences of category B and C will have the possibility to pass the driving test at 17 years of age. However, they will not be authorised to drive alone before 18 years of age. Such a system is already available for category B in some Member States (e.g. Germany, Austria) and has shown very positive effects on road safety. The learner is acquiring experience under the supervision of an adult and is more capable to drive when he/she reaches 18 years of age. The effect on road safety for this measure is expected to be positive.
- The optional possibility to allow driving vehicles with maximum speed and mass limitations with a licence of category B1 instead of category B (PM 11) is expected to improve the mobility of young people, especially in rural areas. The measure may pose an additional road safety risk, notably for vulnerable road users. However, the measure is proposed to be optional (it requires a decision of the concerned Member State), the maximum speed and the mass of the vehicles are significantly limited (45 km/hour and 2.5 tons) in order to reduce the consequences of an accident, and the category of concerned drivers is narrowed down to the strict need (applicable only to drivers aged up to 21 years). Finally, the requirements on skills and knowledge to be met at the driving test for a licence of category B1 are the same as for category B but for a lower speed (60 km/hour[138]).

6 6 WHAT IS THE IMPACT OF THE POLICY OPTIONS?

This section summarises the main expected economic, social and environmental impacts of each policy option[139]. The proposed measures included in the policy options are assumed to be

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134 https://www.eea.europa.eu/ims/new-registrations-of-electric-vehicles
135 vans_fact_sheet_ACEA.pdf
136 Regulation (EU) 2019/2144 (OJ L 325, 16.12.2019, p. 1).
137 https://ec.europa.eu/commission/presscorner/detail/en/IP_22_4312
138 The two values of speed (45 and 60km/hour) are different because category B1 is targeting heavy quadri- motorcycles which are usually lighter than these vehicles (modified M1 category).
139 The analysis in this section is based on COWI et al. (2022), *Impact assessment support study for the revision of the directive on driving licences*, and on the analysis of stakeholders' feedback.

implemented from 2025 onwards, so that the assessment has been undertaken for the 2025-2050 period, and it refers to EU27. Costs and benefits are expressed as present value over the 2025-2050 period, using a 3% discount rate. As the analysis covers a long-term future, it incorporates foresight analysis described in section 2.3.3 and in the baseline section. Further details on the methodological approach are provided in Annex 4.

6.1 6.1 Economic impact

The assessment of the economic impacts includes the costs which the various policy options entail for public administrations, the private sector and citizens. In addition, this section covers the impacts on SMEs, digital by default[140] and the functioning of the internal market and competition.

6.1.1 Impact on public administrations

Adjustment costs for Member States administrations. The adjustment costs for Member States administrations are the same in PO-A, PO-B and PO-C, driven by three policy measures (PMc1, PMc4 and PMc9) included in all options. More specifically, the update of standards on skills and knowledge for the first issuance of a driving licence (PMc1) requires the development of (animated) videos for the driver hazard perception test (HPT). These videos are assumed to be developed and updated every 5 years, starting from 2025. At EU level, the costs for implementing PMc1 are estimated at EUR 3.5 million in 2030 and 2050 relative to the baseline (see Table 3)[141]. In addition, the improvement of RESPER for the purpose of enforcement (PMc4) is estimated to lead to one-off costs of EUR 50,000 on average per Member State, i.e. EUR 1.4 million for the whole EU in 2025. Furthermore, the introduction of the EU mobile driving licence (PMc9) requires the development of an IT system for mobile driving licences[142]. Such an IT system would involve one-off costs of EUR 12.9 million in 2025 plus annual maintenance costs estimated at EUR 1.9 million relative to the baseline (see Table 3). The other measures included in the three options do not have a significant impact on the adjustment costs for Member States administrations. The detailed impacts on costs by policy measure are provided in Annex 4.

Overall, PO-A, PO-B and PO-C are estimated to result in one-off adjustment costs for EU Member States' administrations of EUR 14.3 million in 2025 and to recurrent adjustment costs of EUR 5.5 million in 2030 and 2050 relative to the baseline (see Table 3). Expressed as present value over the 2025-2050 horizon (in 2021 prices), the total adjustment costs for the Member States administrations (including one-off costs) are estimated at EUR 63.2 million in all policy options.

Table 3. Recurrent costs and costs savings for Member States administrations in the POs relative to the baseline scenario (EU27), in million EUR (2021 prices)[143]

	Difference to the baseline					
	PO-A		PO-B		PO-C	
	2030	2050	2030	2050	2030	2050
Adjustment costs - recurrent	5.5	5.5	5.5	5.5	5.5	5.5
PMc1 – updated standards on skills	3.5	3.5	3.5	3.5	3.5	3.5
PMc4 – improvement of RESPER						
PMc9 – EU mobile driving licence	1.9	1.9	1.9	1.9	1.9	1.9
Enforcement costs	0.0	0.0	1.5	1.1	4.5	3.0

140 https://ec.europa.eu/info/sites/default/files/file_import/digitally-transformed_user-focused_data-driven_commission_en.pdf

141 Belgium, Germany, Finland and the Netherlands already implement this measure and thus no additional costs are expected for these Member States relative to the baseline.

142 Different costs are foreseen for the Member States that would need to set up the system and those that have a system in place or under development but would need to upgrade it. More details are provided in Annex 4.

143 Source: COWI, Ecorys and NTUA (2022), Impact assessment support study; Note: excluding one-off adjustment costs

PM4 – driving disqualifications (I)			1.5	1.1		
PM5 – driving disqualifications (II)					4.5	3.0
Enforcement cost savings	145.9	181.2	145.9	181.2	145.9	181.2
PMc9 – EU mobile driving licence	129.0	145.5	129.0	145.5	129.0	145.5
PMc10 – QR code	0.03	0.04	0.03	0.04	0.03	0.04
PMc11 – administrative validity	16.9	35.7	16.9	35.7	16.9	35.7
Administrative cost savings	90.8	133.2	90.8	133.2	90.8	133.2
PMc9 – EU mobile driving licence	90.8	133.2	90.8	133.2	90.8	133.2

Enforcement costs for Member States administrations. In PO-B the driving disqualifications resulting from specific offenses (for example driving under the influence of alcohol) would be mutually recognised (PM4). The increase in the number of driving disqualifications for such offences is estimated at 182,514 in 2030 and 225,000 in 2050 relative to the baseline. Total enforcement costs for Member States authorities are estimated at EUR 1.5 million in 2030 and EUR 1.1 million in 2050 relative to the baseline (see Table 3). These costs are related to the time required for investigations[144] and mailing costs. More details on the estimation of the costs are provided in Annex 4, including detailed results by Member State.

In PO-C, penalty points will also be applied to non-residents and driving disqualification resulting from penalty points system should be mutually recognised (PM5). The total number of cases where the penalty points need to be applied is estimated at 525,288 in 2030 and 606,915 in 2050 relative to the baseline. Total enforcement costs for Member States authorities are estimated at EUR 4.5 million in 2030 and EUR 3 million in 2050 relative to the baseline (see Table 3). Expressed as present value over the 2025-2050 horizon (in 2021 prices), the enforcement costs for Member States administrations are estimated at EUR 26.3 million in PO-B and EUR 75.3 million in PO-C.

Enforcement cost savings for Member States administrations. The three policy options entail enforcement cost savings for the Member States administrations. They are driven by three common policy measures (PMc9, PMc10 and PMc11) included in PO-A, PO-B and PO-C and are thus the same for all options. More specifically, the introduction of the EU mobile driving licences (PMc9) is expected to lead to cost savings related to the production of driving licences, estimated at EUR 129 million in 2030 and EUR 145.5 million in 2050 relative to the baseline (see Table 3). The enforcement cost savings due to the introduction of a QR code on the physical licence in the areas reserved for a microchip (PMc10) are estimated to be limited (EUR 0.03 million in 2030 and 0.04 million in 2050) relative to the baseline. This is because only the Netherlands makes use of microchips (and would thus be affected by PMc10) and most driving licences would become digital in PO-A, PO-B and PO-C as an effect of PMc9. In addition, PMc11 (improvement and simplification of rules on administrative validity) is estimated to lead to enforcement cost savings of EUR 16.9 million in 2030 and EUR 35.7 million in 2050 relative to the baseline (see Table 3). This is because, in PMc11, the 15 year long administrative validity of driving licences for A and B categories will be made mandatory and exclusive. The Directive currently requires an administrative validity period of 10

[144] Based on stakeholders' consultation in the context of the impact assessment for the revision of Directive (EU) 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences (CBE Directive), the investigation time per foreign registered offence is currently around 15 minutes. The time spent on investigation depends to a large extent on whether the process is automated or not. Member States that adopt an automated system, and adopt an owner/holder liability regime, generally have an investigation time between 1 and 3 minutes. In the baseline scenario, a decrease in the investigation time of 5% per year has been assumed, in line with the impact assessment accompanying the revision of the CBE Directive. The investigation time is thereby estimated at 15 minutes in 2019, 8.5 minutes in 2030, 5.1 minutes in 2040 and 3.1 minutes in 2050. This explains why the enforcement costs decrease over time relative to the baseline, while the number of investigations increases.

years but allows Member States to also issue licences for 15 years. Thus, PMc11 would only lead to cost savings for the 15 Member States that issue licences with an administrative validity period of 10 years[145]. The detailed impacts on costs by policy measure are provided in Annex 4, also accounting for the synergies between the measures included in each option.

Overall, PO-A, PO-B and PO-C are estimated to result in enforcement cost savings for EU Member States administrations of EUR 145.9 million in 2030 and EUR 181.2 million in 2050 relative to the baseline (see Table 3). Expressed as present value over the 2025-2050 horizon (in 2021 prices), the total enforcement cost savings for the Member States administrations are estimated at EUR 2,830.6 million in all policy options.

Administrative cost savings for Member States administrations. For all policy options, the introduction of the EU mobile driving licence (PMc9) is also expected to lead to administrative cost savings for Member States administrations estimated at EUR 90.8 million in 2030 and EUR 133.2 million in 2050 relative to the baseline (see Table 3). Expressed as present value over the 2025-2050 horizon (in 2021 prices), the total administrative cost savings for the Member States administrations are estimated at EUR 1,969.3 million in PO-A, PO-B and PO-C. These costs are related to the time spent to ensure that the physical licences are issued to the right person, and thus the time spent to validate the identity of the person to which a new licence is provided. When procedures are digitised, the time spent on such procedures and the associated costs are overcome. The other measures included in the three options do not have a significant impact on the administrative costs or cost savings for Member States administrations. The detailed impacts on costs savings for PMc9 are provided in Annex 4.

Net cost savings for Member States administrations. Overall, when considering the adjustment costs (both one-off and recurrent), the enforcement costs, the enforcement cost savings and the administrative cost savings, the net cost savings for Member States administrations are estimated at EUR 4,736.6 million in PO-A, EUR 4,710.4 million in PO-B and 4661.4 million in PO-C, expressed as present value over the 2025-2050 horizon (in 2021 prices) relative to the baseline. The net cost savings for Member States administrations are largely driven by the introduction of the EU mobile driving licences (PMc9). The difference between net savings between policy options is explained by PM4 and PM5 which are included only in PO-B and PO-C, respectively.

Adjustment costs for the European Commission. Three policy measures included in the options are expected to lead to adjustment costs for the European Commission: PMc7 (common to PO-A, PO-B and PO-C), PM6 (included in PO-B) and PM7 (included in PO-C). The costs for the European Commission of PO-B (due to PM6) and PO-C (due to PM7) are expected to be the same.

PMc7 (establishment of an information platform for authorities to exchange on the physical and mental fitness to drive) would involve the organisation by the Commission of one meeting per year between national experts, to exchange knowledge and best practices regarding physical and mental fitness to drive, complemented by other online events. The cost of the meeting is estimated at EUR 30,000 per year (from 2025 onwards) and includes the reimbursement of the national experts. In addition, both PM6 (rules on simple medical screening) and PM7 (rules on advanced medical screening) would require the development of an (online) training programme for general practitioners. The costs for developing the online content of the training programme are estimated at EUR 33,500 to EUR 142,000, depending on the level of detail. The training programme is assumed

[145] These Member States are: BE, BG, EE, ES, HR, HU, IE, IT, LT, LV, MT, NL, RO, SE and SI.

to be updated regularly (once every five years), starting from 2025. More detailed explanations are provided in Annex 4.

Overall, PO-A is estimated to result in adjustment costs for the European Commission of EUR 0.03 million in 2030 and 2050 relative to the baseline, while PO-B and PO-C would lead to costs of EUR 0.06 to 0.17 million in 2030 and 2050 relative to the baseline. Expressed as present value over the 2025-2050 horizon (in 2021 prices), the total adjustment costs for the European Commission are estimated at EUR 0.6 million in PO-A, and at EUR 0.7 to 1.1 million in PO-B and PO-C.

6.1.2 Impact on the private sector

Hassle costs savings for road transport operators. PMc9 (introduction of the EU mobile driving licences), included in all three policy options, is estimated to lead to a reduction in hassle costs for the renewal of category C and D licences[146]. A World Bank study[147] on the Estonian e-Government system conservatively estimated that each renewal request saved 15 minutes on average compared to the case where the system was not in place. C and D licences are mainly used by professional drivers and the cost savings are thus expected to benefit transport operators, mainly SMEs in the road transport sector (SMEs represent 99% of the road transport operators)[148]. The hassle cost savings are derived by using the average labour costs by Member State[149], and are estimated at EUR 32.8 million in 2030 and EUR 38.7 million in 2050 relative to the baseline (see Table 4)[150]. Expressed as present value over the 2025-2050 horizon (in 2021 prices), total hassle cost savings for road transport operators are estimated at EUR 587 million in PO-A, PO-B and PO-C relative to the baseline.

Adjustment costs for general practitioners. In PO-B, the measure related to rules on simple medical screening (PM6) is expected to lead to 4,515 additional (online) training courses for general practitioners in 2030 and 5,057 courses in 2050, relative to the baseline[151]. The adjustment costs for general practitioners in PO-B are estimated at EUR 3.1 million in 2030 and EUR 3.4 million in 2050 relative to the baseline[152] (see Table 4). In PO-C the measure related to rules on advanced medical screening (PM7) has the same impact as PM6 in terms of costs for (online) training courses for general practitioners. Expressed as present value over the 2025-2050 horizon (in 2021 prices), total adjustment costs for GPs are estimated at EUR 57.7 million in PO-B and PO-C.

Table 4: Costs and cost savings for the private sector in the POs relative to the baseline scenario (EU27), in million EUR (2021 prices)[153]

	Difference to the baseline					
	PO-A		PO-B		PO-C	
	2030	2050	2030	2050	2030	2050
Hassle cost savings	32.8	38.7	32.8	38.7	32.8	38.7
PMc9 – EU mobile driving licence	32.8	38.7	32.8	38.7	32.8	38.7
Adjustment costs			3.1	3.4	3.1	3.4
PM6 – simple medical screening			3.1	3.4		

146 These costs relate for example to the waiting time for picking up the physical licence, etc.
147 https://thedocs.worldbank.org/en/doc/165711456838073531-0050022016/original/WDR16BPEstonianeGovecosystemVassil.pdf
148 https://eur-lex.europa.eu/resource.html?uri=cellar:9d5c61bf-4629-11e7-aea8-01aa75ed71a1.0001.02/DOC_1&format=PDF
149 Eurostat Structure of earnings survey, Labour Force Survey data for Non-Wage Labour Costs
150 To improve clarity, the upper part of Table 4 covers the measures that are common in all policy options while the bottom part the measures that are included only in PO-B and PO-C.
151 PM6 is expected to lead to additional training courses for GPs in all MS except for EL, HU, IT, LV, PL, RO and ES that are expected to continue to implement a stricter screening (medical assessment instead of screening) and for which a training of GPs to support the screening is not required.
152 The EU average tariff per hour for a trainer is estimated at 150 EUR and the training is assumed to last 4 hours.
153 Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

	Difference to the baseline					
	PO-A		PO-B		PO-C	
	2030	2050	2030	2050	2030	2050
PM7 – advanced medical screening					3.1	3.4
Administrative cost savings			44.8	53.8	44.8	53.8
PM8 – removal of staging requirement			44.8	53.8	44.8	53.8

Administrative cost savings for road transport operators. In PO-B and PO-C, the removal of the requirement to hold a licence of category C or D to obtain a licence of category CE or DE (PM8) is expected to lead to administrative cost savings for professional drivers that benefit road transport operators. The removal of this requirement would lead to a reduction in the number of theoretical and practical tests required to obtain a CE or DE category licence, estimated at 469,349 in 2030 and 572,082 in 2050, relative to the baseline. The administrative cost savings for road transport operators in PO-B and PO-C are thus estimated at EUR 44.8 million in 2030 and EUR 53.8 million in 2050 relative to the baseline[154] (see Table 4). Expressed as present value over the 2025-2050 horizon (in 2021 prices), total administrative cost savings for road transport operators are estimated at EUR 875.3 million in PO-B and PO-C.

For the purpose of reporting on the application of the 'one in, one out' approach[155], the annual average reduction in the number of theoretical and practical tests for 2025-2050 has been estimated at 510,474 relative to the baseline in both PO-B and PO-C and the annual average cost savings for 2025-2050 at EUR 48.5 million[156], which implies an average cost per theoretical and practical test for a C and D category licence of 95 EUR.

6.1.3 Impact on citizens

In terms of benefits for citizens, the initiative will increase the assurance that drivers on EU roads have the skills, knowledge, experience, and risk awareness, are physically and mentally fit to drive and that their behaviour is not dangerous. Ensuring a high level of safety is important for all road users. It will also have positive effects on road transport operators, driving schools and law enforcement authorities, since their employees and civil servants will be less exposed to safety risks.

The initiative will also remove barriers affecting persons when obtaining or exercising driving rights, and the most important effect will result from the **introduction of mobile driving licences**, which is common to all policy options. It will allow the drivers seamless interaction with authorities when exchanging information on driving rights. Regarding the risk of exclusion for certain category of population potentially resulting from the introduction of the EU mobile driving licences, the measure has been designed according to the "digital by default" principle. It envisages that physical driving licences will continue to be issued upon request and without conditions. Persons with less access to digital technology will continue to be able to prove their driving rights with physical driving licences. This would also be the case for drivers who travel abroad in countries where the EU mobile driving licence is not recognised.

In addition, PO2 and PO3 will include other measures that will affect targeted groups of citizens, in particular holders of driving licences transferring to other EU countries, applicants that are not fluent

[154] The average cost per theoretical test for a category C licence is estimated at EUR 42, based on data for 17 Member States, and the average cost per practical test at EUR 134. For a category D licence, the average cost per theoretical test is estimated at EUR 43, based on data for 17 Member States, while the average cost per practical test at EUR 136. For the Member States for which data was not available, the average cost per test for the 17 Member States has been used.

[155] https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en

[156] Both the annual reduction in the number of tests and the annual costs savings are calculated as simple averages over 2025-2050 for the purpose of 'one in, one out'.

in the language of their host country, or young persons willing to become professional drivers. PO2 and PO3 will also introduce measures allowing faster access to licences of category CE or DE for professional drivers across the EU, which will reduce barriers to access to the driver profession.

The specific rules related to the **concept of normal residence**, which are included in all three policy options, will also help persons transferring their normal residence to another Member State. Even if the number of persons facing unnecessary or unjustified procedures is rather low, consequences for each individual can be significant. Clarification of the concept of normal residence should solve the problem of determining the issuing authority just after the transfer of residence and it is expected to contribute positively to the freedom of movement.

Simplification of rules on administrative validity will put the holders of EU driving licences on equal footing, regardless in which country they apply for or extend the licence and facilitate the exchange of driving licences by issuing authorities that will not be faced with driving licences with validity periods different from those they apply (included in PO1, PO2 and PO3). The mutual recognition of optional equivalences will allow holders of driving licences to enjoy rights granted by an optional equivalence also in other Member States applying the same rules (all three policy options include this measure).

Due to the alignment to the latest legislation on the **protection of personal data and the use of the eIDAS** features for the EU mobile driving licence, which will be included in all three policy options, citizens will benefit from a high level of security and privacy of the information handled. Regarding the possible introduction of a QR code (included in in PO1, PO2 and PO3), the same approach on data protection as the one for the microchip on a physical driving licence will apply: the QR code will provide access to the same information as the one on the physical driving licence. In any case, it will not be possible to access the information without a visual access to the physical driving licence.

The mutual recognition of driving disqualifications, provided in PO2 and PO3, will give procedural safeguards to non-resident drivers who commit road safety traffic offences and ensure that their fundamental rights are respected. PO2 and PO3 will also have a positive impact on the right of non-discrimination, given they will provide flexibility for the first issuance of driving licences in case of restrictions related to languages which will allow applicants to choose where to take the tests.

Administrative cost savings for citizens. Two policy measures lead to administrative cost savings (PM2c and PM12). PM2c (introduction of rules to remove restrictions associated to automatic gear transmission) is common to the three policy options, while PM12 (rules on the removal of Code 70) is only included in PO-C.

In the baseline scenario, the applicants for a B licence need to conduct a complete test with a vehicle with manual transmission if they want to remove the restrictions (Code 78) on their driving licences issued following a driving test with a vehicle with an automatic transmission. In PMc2 it is assumed that the conditions to remove Code 78 will be lighter (shorter test or certified training). PMc2 is expected to only affect holders of a Code 78 licence[157] that would like to have this code removed. In the baseline scenario, the number of practical tests for a Code 78 licence is projected to increase to 1.6 million at EU level by 2030 and 8.1 million by 2050, driven by the uptake of zero-emission vehicles with automatic transmission. In Germany, some 450 tests are conducted annually to have Code 78 removed. This represents around 0.9% of the Code 78 tests[158]. In PMc2 the number of

[157] The harmonised Union code 78 imposes a restriction on holders of such a licence, in the sense that they can only drive a vehicle with automatic transmission.

[158] https://www.bundesrat.de/SharedDocs/drucksachen/2020/0501-0600/579-20.pdf?__blob=publicationFile&v=1

practical tests for removing Code 78 would decrease by 0.9% in 2025, 0.1% in 2030 and 0% by 2050 relative to the baseline. The reduction is significantly lower post-2025 because of the increasing share of vehicles with automatic transmission and thus the limited need to be able to drive a vehicle with manual transmission. PMc2 would result in a decrease in the number of practical tests at EU level by 1,019 in 2030 and 714 in 2050 relative to the baseline. The administrative cost savings for citizens are estimated at EUR 0.09 million in 2030 and EUR 0.07 million in 2050 relative to the baseline (see Table 5). Altogether, citizens are expected to benefit from administrative cost savings due to removing restrictions associated to automatic gear transmission, estimated at EUR 2.3 million expressed as present value over 2025-2050 relative to the baseline in all three policy options.

For the purpose of reporting on the application of the 'one in, one out' approach, the annual average reduction in the number of practical tests for 2025-2050 has been estimated at 1,184 relative to the baseline in PO-A, PO-B and PO-C for PMc2 and the annual average decrease in the administrative costs for 2025-2050 at EUR 0.1 million[159], implying an average cost per practical test of EUR 92.

In the baseline, holders of a third country licence are restricted via code 70. Other EU Member States may decide not to recognise the licence. As such, these holders may have to conduct a driving test (theoretical and practical) to be able to obtain an EU licence when changing residence. In PM12 (included in PO-C), code 70 is assumed to be removed from the licence when the driver has been holding an EU licence for at least 5 years and has not committed serious road traffic offenses. By implementing PM12, it is expected that fewer holders of a third country licence would conduct a driving test to obtain an EU licence that can also be exchanged when the holder changes residence. Thus, the number of tests is estimated to decrease by 7,235 in 2030 and 7,552 in 2050 relative to the baseline. The administrative cost savings for citizens are estimated at EUR 1 million in 2030 and EUR 1.1 million in 2050 relative to the baseline (see Table 5). Expressed as present value over the 2025-2050 period, they are estimated at EUR 19.3 million relative to the baseline (in 2021 prices) in PO-C.

For the purpose of reporting on the application of the 'one in, one out' approach, the annual average reduction in the number of theoretical and practical tests for 2025-2050 has been estimated at 7,353 relative to the baseline in PO-C for PM12 and the annual average reduction in the administrative costs for 2025-2050 at EUR 1.1 million[160], which implies an average cost for the theoretical and practical test of 143 EUR.

Table 5: Costs and cost savings for applicants/holders of driving licences in the POs relative to the baseline scenario (EU27), in million EUR (2021 prices)[161]

	Difference to the baseline					
	PO-A		PO-B		PO-C	
	2030	2050	2030	2050	2030	2050
Adjustment costs	2.8	2.9	2.8	2.9	2.8	2.9
PMc1 – updated standards on skills	2.8	2.9	2.8	2.9	2.8	2.9
Administrative cost savings	0.09	0.07	0.09	0.07	0.09	0.07
PMc2 – rules on gear transmission	0.09	0.07	0.09	0.07	0.09	0.07
Adjustment cost savings	136.0	130.3	136.0	130.3	136.0	130.3
PMc5 – updated medical standards	136.0	130.3	136.0	130.3	136.0	130.3
Hassle cost savings	72.7	116.0	72.7	116.0	72.7	116.0

[159] Both the annual reduction in the number of tests and the annual cost savings are calculated as simple averages over 2025-2050 for the purpose of 'one in, one out'.

[160] Both the annual reduction in the number of tests and the annual cost savings are calculated as simple averages over 2025-2050 for the purpose of 'one in, one out'.

[161] Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

	Difference to the baseline					
	PO-A		PO-B		PO-C	
	2030	2050	2030	2050	2030	2050
PMc9 – EU mobile driving licence	72.7	116.0	72.7	116.0	72.7	116.0
Adjustment costs			24-47.8	43.8-68.3	369.9-502.5	440.4-578.8
PM6 – simple medical screening						
Low			24.0	43.8		
High			47.8	68.3		
PM7 – advanced medical screening						
Low					369.9	440.4
High					502.5	578.8
Adjustment cost savings			131.0	124.2		
PM6 – simple medical screening			131.0	124.2		
Administrative cost savings					1.0	1.1
PM12 – removal of code 70					1.0	1.1

Adjustment costs for citizens. In all policy options (PO-A, PO-B and PO-C), the update of standards on skills and knowledge for the first issuance of a driving licence (PMc1) is expected to lead to adjustment costs for applicants for a B category licence. PMc1 will extend the range of issues subject to testing, including knowledge of new vehicle features (safe use of Advanced Driving Assistance System/automation) as well as perception of hazardous situations, understanding of risk factors in normal traffic situations (including the presence of new vulnerable road users such as e-scooters) and knowledge of the safety of zero emission vehicles (e.g. chemical and explosion risks in the event of fire affecting an electric vehicle). It is likely to result in adjustment costs for applicants, especially concerning the theoretical test. This is because applicants are to be tested on more subjects. Especially the Hazard Perception Test (HPT) that is conducted separately from a theoretical test might result in fewer passing the test and the need to retake the test. Belgium, Germany, Finland and the Netherlands have already introduced the HPT and they are assumed to continue to implement it in the baseline scenario. At EU level, PMc1 is estimated to lead to an increase in the number of theoretical tests, due to a drop in the passing rate and the need to retake the test, by 74,174 in 2030 and 75,382 in 2050. This would lead to an increase in the costs for the first issuance of the licence for those that need to retake the test (estimated at EUR 2.8 million in 2030 and EUR 2.9 million in 2050 relative to the baseline[162] (see Table 5[163]). As acknowledged in the evaluation support study[164], the data collected on the costs of driving licences for the first application cover both the theoretical and practical tests, as well as the cost of the licence itself[165]. Expressed as present value over the 2025-2050 period, the adjustment costs for consumers in PO-A, PO-B and PO-C are estimated at EUR 52.5 million relative to the baseline (in 2021 prices).

Two additional measures (PM6 and PM7), included in PO-B and PO-C respectively, lead to adjustment costs for citizens. Both PM6 (rules on simple medical screening) and PM7 (rules on advanced medical screening) include the screening of fitness to drive for each driver renewing its driving licence independent of age, possible or mandatory more frequent screening for elderly drivers and a vision test for applicants. In PO-B, the adjustment costs for citizens are estimated at EUR 24

[162] The average cost for a theoretical test is estimated at EUR 38, based on information obtained for 17 Member States (i.e. ranging between EUR 7 EUR for Poland to EUR 110 for Portugal). For the other Member States, the average cost for a theoretical test has been used for estimating the costs.

[163] To improve clarity, the upper part of Table covers the measures that are common in all policy options while the bottom part the measures that are included only in PO-B and PO-C.

[164] Support study to the ex-post evaluation of Directive 2006/126/EC on Driving Licences - Publications Office of the EU (europa.eu)

[165] The costs related to the tests and the licence cannot be separated.

to 47.8 million in 2030 and EUR 43.8 to 68.3 million in 2050 relative to the baseline, while in PO-C they are estimated at EUR 369.9 to 502.5 million in 2030 and EUR 404.4 to 578.8 million in 2050 relative to the baseline (see Table 5). Expressed as present value over the 2025-2050 period, the adjustment costs for citizens are estimated at EUR 663.6 to 1,106.6 million relative to the baseline (in 2021 prices) in PO-B and EUR 7,472.4 to 9,960.9 million PO-C. The significant difference between PO-B and PO-C comes from the rules related to the administrative validity of driving licences for category A and B for elderly drivers. In PO-C the administrative validity of driving licences for drivers above 65 years old is shortened to 5 years, which results in an increase in the number of medical checks at EU level (i.e. by 2.6 million in 2030 and 3.2 million in 2050 relative to the baseline) and thus significant adjustment costs for citizens. On the other hand, in PO-B more frequent medical screening for drivers above 70 years old results in a reduction in the number of medical checks at EU level (i.e. by 3.6 million in 2030 and 3.4 million in 2050 relative to the baseline) and is thus reported in the following section. The reduction in the number of medical checks results from the change of the minimum age from which a more frequent assessment of elderly drivers can be required. The current Directive specifies a minimum age of 50 years while PM6 and PM7 specify respectively an age of 70 and 65 years. The requirement of mandatory frequent tests will have a limited effect considering the number of drivers aged 65 and above, and the fact that a number of Member States currently apply more frequent assessments of elderly drivers at ages higher than 50 years.The impact of these two measures on the number of medical checks depends on the baseline situation in each Member State. The differences between adjustment costs for the screening of fitness to drive when renewing the driving licence independent of age and the vision test also play a role in the difference between PO-B and PO-C. Detailed explanations for PM6 and PM7 at Member State level are provided in Annex 4.

Adjustment cost savings for citizens. Two measures (PMc5 and PM6) lead to adjustment cost savings for citizens. PMc5 (update of standards on physical and mental fitness to be met for the issuance of driving licences) is common to the three policy options, while PM6 is included in PO-B. In PMc5, less frequent medical checks of drivers suffering from diabetes (every 10 years instead of 5) taking into account the evolution of medical care for this disease, are estimated to lead to a reduction in the number of medical tests by 2.3 million in 2030 and 2.2 million in 2050 relative to the baseline. The adjustment cost savings for citizens are estimated at EUR 136 million in 2030 and EUR 130.3 million in 2050 relative to the baseline, in PO-A, PO-B and PO-C. The changes in the rules for the consultation of the GP for elderly people (above 70 years old) lead to adjustment cost savings estimated at EUR 131 million in 2030 and EUR 124.2 million in 2050 relative to the baseline for PM6 (PO-B), due to the reduction in the number of medical checks (i.e. by 3.6 million in 2030 and 3.4 million in 2050 relative to the baseline). Citizens are expected to benefit from adjustment cost savings due to less frequent medical checks for drivers suffering from diabetes (every 10 years instead of 5) and changes in the rules for the consultation of the general practitioners for elderly people (above 70 years old), estimated at EUR 2,477.5 million relative to the baseline (in 2021 prices) in PO-A and PO-C and at EUR 4,891.4 million PO-B.

Hassle cost savings for citizens. PMc9 (introduction of the EU mobile driving licence), included in all three policy options, is estimated to lead to a reduction in hassle costs for the renewal of category A and B licences[166]. A World Bank study[167] on the Estonian e-Government system conservatively estimated that each renewal request saved 15 minutes on average compared to the case where the system was not in place. The hassle cost savings for citizens are estimated at EUR 72.7 million in 2030 and EUR 116 million in 2050 relative to the baseline (see Table 5). Expressed as present value

[166] These costs relate for example to the waiting time for picking up the physical licence, etc.
[167] https://thedocs.worldbank.org/en/doc/165711456838073531-0050022016/original/WDR16BPEstonianeGovecosystemVassil.pdf

over the 2025-2050 horizon (in 2021 prices), total hassle cost savings for citizens are estimated at EUR 1,697.2 million in PO-A, PO-B and PO-C.

Overall, ***PO-A and PO-B would result in net cost savings (i.e. benefits) for citizens*** estimated at EUR 4,124.4 million in PO-A and at EUR 5,431.8 to 5,874.7 million in PO-B, expressed as present value over the 2025-2050 horizon. On the other hand, ***PO-C would result in net costs for citizens*** estimated at EUR 3,328.7 to 5,817.2 million expressed as present value relative to the baseline.

6.1.4 Impact on SMEs

The initiative is relevant for SMEs, specifically for road transport operators, general practitioners and driving schools.

As explained in section 6.1.2, all policy options are expected to result in a reduction of hassle costs for ***road transport operators***, 99% of them being SMEs (enterprises employing up to 250 people and with a turnover of less than EUR 50 million[168,169,170]), due to the implementation of the introduction of the EU mobile driving licence for the C and D categories.

The hassle cost savings are estimated at EUR 32.8 million in 2030 and EUR 38.7 million in 2050 relative to the baseline (see section 6.1.2). Expressed as present value over the 2025-2050 horizon (in 2021 prices), total hassle cost savings for road transport operators are estimated at EUR 587 million in PO-A, PO-B and PO-C. In addition, PO-B and PO-C would result in administrative cost savings for road transport operators due to the removal of the requirement to hold a licence of category C or D to obtain a licence of category CE or DE (PM8). The administrative cost savings for road transport operators in PO-B and PO-C are estimated at EUR 44.8 million in 2030 and EUR 53.8 million in 2050 relative to the baseline (see section 6.1.2). Expressed as present value over the 2025-2050 horizon (in 2021 prices), the cost savings are estimated at EUR 875.3 million in PO-B and PO-C relative to the baseline. Thus, all policy options would lead to a reduction in costs for road transport operators, although the impacts of PO-B and PO-C would be higher than those of PO-A.

On the other hand, PO-B and PO-C are expected to result in ***additional costs for general practitioners,*** linked to the need to follow training on fitness to drive. Indeed, general practitioners are usually working as independent or as part of a health centre that employs less than 250 persons. Therefore, they fall under the EUROSTAT definition of SMEs. The adjustment costs for general practitioners are estimated at EUR 3.1 million in 2030 and EUR 3.4 million in 2050 relative to the baseline in PO-B and PO-C. Expressed as present value over the 2025-2050 horizon (in 2021 prices), total adjustment costs for general practitioners are estimated at EUR 57.7 million in both PO-B and PO-C (see section 6.1.2).

Another group of small and medium-sized businesses to be affected by the initiative will be the driving schools' sector. Driving schools will continue to have the opportunity to offer training to applicants for a driving licence but with further harmonisation of the different categories of driving licences they are expected to gain additional work opportunities in all policy options (PO-A, PO-B and PO-C). The overall impact of the initiative on driving schools is expected to result from the combination of two direct effects:

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[168] See Commission Recommendation 2003/361/EC of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises, OJ L 124, 20.5.2003, p. 36.

[169] https://eur-lex.europa.eu/resource.html?uri=cellar:9d5c61bf-4629-11e7-aea8-01aa75ed71a1.0001.02/DOC_1&format=PDF

[170] https://ec.europa.eu/eurostat/databrowser/view/SBS_SC_1B_SE_R2__custom_3493320/default/table

- The update of standards and rules will result in costs to update the curricula. However, introducing rules on training has been discarded (see Annex 5). Consequently, the changes will be limited and could be dealt with at a limited cost via the periodic updates performed notably to align with new traffic rules;
- The actions taken to facilitate the access to categories of licence relevant to professional drivers will increase marginally the number of persons passing the tests and therefore the opportunity to supply training services.

In addition, the rule related to automatic gear transmission (PMc2), included in the three policy options, is expected to indirectly have a positive impact on SME. On the one hand, according to views provided by driving schools in the context of the consultation activities, applicants are not willing to train and pass the driving test on a vehicle with an automatic gear transmission because of the need to undergo an additional complete test to be able to drive vehicles with manual gear transmission. On the other hand, as underlined in the section on problems, the offer has already started to decrease for first-hand vehicles with manual gear transmission considering the target of 100% of new cars to be zero emission in 2035, as proposed by the Commission as part of the "Fit for 55" package. PMc2, included in all options, will address this inconsistency between the evolution of the vehicle market and of customer demand. It will allow for a simpler removal of restrictions on driving licences obtained following a driving test on a vehicle with automatic gear transmission with a training or a test focusing strictly on skills and knowledge that are different when driving vehicles with manual or automatic gear transmission. It will have a positive impact on driving schools allowing them to adapt their business and their vehicle fleet, in line with the EU policy on alternative-fuelled vehicles.

6.1.5 Digital by default

All policy options will have a positive impact on the application of the 'digital by default' principle, introduced by the common measure on the EU digital driving licence (PMc9). The driving licence under all options will be issued in digital format by default from 2028. Therefore, the administrative procedures involving driving licences will be conducted digitally and the private sector will also be able to develop on-line solutions when driving rights should be proven. However, it should be noted that it will remain necessary to keep the possibility to issue physical driving licences (for example when the driver is to travel to a third country where the digital driving licence is not recognised). Another measure which will also contribute to the digital principle is the introduction of a possible QR code on the physical licence in the areas currently reserved for a microchip (PMc10), which will provide access to additional information, not displayed on the physical driving licence, and is also common to all three options. This measure will benefit from the infrastructure to be implemented to support the mobile driving licences (PMc 9). It will indeed rely on the same type of API for licence registry as used by the mobile driving licences. In addition, the improvement of RESPER (PMc4) will increase the use of digital means by administrations with indirect benefits for the holders of driving licences. Finally, a special attention will be given to removing potential obstacles to digital training and testing, when it does not negatively affect road safety, notably when updating the standards on skills and knowledge (PMc1), introducing training of general practitioners (PM6 and PM7) and the rules to remove Code 78 related to gear transmission (PMc2).

6.1.6 Impact on the functioning of the internal market and on competition

Internal market. All policy options are expected to have a positive impact on the functioning of the internal market, by removing unnecessary barriers for applicants and holders of driving licences and facilitating the free movement of people. All options will specify how the normal residence should be determined during the first six months of establishment in a new country (PMc8). They will also include the mutual recognition of the new equivalence applicable to small buses combined with a

trailer (PMc12) and introduce mobile driving licences (PMc9), which will rely on the ISO/IEC 18013-5 standard. This will ensure interoperability of the mobile driving licences issued by each EU Member State and their recognition in the EU and abroad.

The positive impact of PO-B and PO-C is however expected to be higher than that of PO-A, as these two options will introduce measures allowing faster access to licences of category CE or DE (PM8). They also include additional optional equivalences (PM11 and PM13) that will apply only on the territories of Member States implementing them and are not expected to distort the market. PO-C would have further positive impact on the functioning of the internal market by introducing rules for the exchange of driving licences issued by a third country whose licensing system guarantees a level of road safety equivalent to the one in the EU (PM14). In addition, this policy option introduces a mutual recognition of physical and mental assessments (PM10), with a potential positive impact, albeit indirect, on the free movement of people.

The implementing rules related to the concept of normal residence would also avoid specific cases when a person transferring his or her normal residence to another Member State may have to wait several months to have his or her issuing authority identified. While there is no direct impact of these last measures on the functioning of the internal market and on competition, a positive indirect impact can be expected.

Competitiveness. As explained in section 6.1, all policy options are expected to lead to hassle cost savings for road transport operators since the introduction of the EU mobile driving licence (PMc9), included in all three policy options, is estimated to lead to a reduction in hassle costs for the renewal of the category C and D licences. In addition, in PO-B and PO-C, the removal of the requirement to hold a licence of category C or D to obtain a licence of category CE or DE (PM8) is expected to lead to administrative cost savings for professional drivers that benefit road transport operators. Therefore, it can be concluded that all three policy options improve the competitiveness of the road transport operators, the expected impact being higher in PO-B and PO-C than in PO-A.

6.2 6.2 Social impact

The social impact is assessed in terms of impacts on road safety and impacts on the protection of fundamental rights.

6.2.1 Impacts on road safety

With regard to the impacts in terms of lives saved and serious injuries avoided, the estimates take into account the overlapping impacts between measures.

In addition, conservative assumptions have been used for deriving the impacts, as explained in Annex 4 (section 7). The multiple causes of accidents and the limited availability of a complete dataset leads to uncertainty, as already explained in section 2.1.1. Moreover, Member States play an important role in the implementation and enforcement of the rules on driving licences.

Table 6 provides the expected reduction in the number of fatalities and serious injuries relative to the baseline in 2030 and 2050, while Table 7 shows the cumulative number of lives saved and injuries avoided relative to the baseline over the 2025-2050 horizon.

Table 6: Reduction in the number of fatalities and injuries in the POs relative to the baseline, in 2030 and 2050[171]

	Difference to the baseline					
	PO-A		PO-B		PO-C	
	2030	2050	2030	2050	2030	2050
Fatalities	3	3	51	44	79	68
Serious injuries	29	28	488	419	755	649
Total fatalities and injuries avoided	32	31	539	463	834	717

In PO-A, the updated standards on skills and knowledge (PMc1) are estimated to have a significant positive impact on road safety. On the other hand, the harmonisation of the administrative validity of category A and B licences to 15 years (PMc11) would reduce the frequency of certain medical tests and thus result in limited negative effects. Overall, PO-A results in 3 lives saved in 2030 and in 2050 relative to the baseline, and 28-29 serious injuries avoided (see Table 6). Cumulatively, over the 2025-2050 horizon 48 lives are estimated to be saved (less than 0.1% reduction relative to the baseline) and 466 serious injuries avoided.

The positive impact on road safety would be higher in PO-B, due to the introduction of rules on training and probation period, with a probation period for novice drivers (PM1), the mutual recognition of driving disqualifications (PM4) and the rules on medical screening and assessment (PM 6). In PO-B, the number of lives saved are estimated at 51 in 2030 and 44 in 2050 relative to the baseline, and the number of serious injuries avoided at 488 in 2030 and 419 in 2050. Cumulatively, over the 2025-2050 horizon 1,153 lives are estimated to be saved (0.3% reduction relative to the baseline) and 11,020 serious injuries avoided in PO-B relative to the baseline.

PO-C goes one step further with more advanced rules on driving disqualifications (PM5) and medical fitness (PM7), resulting in 79 lives saved in 2030 and 68 lives saved in 2050. In addition, the number of serious injuries avoided is estimated at 755 in 2030 and 649 in 2050 relative to the baseline. Cumulatively, over the 2025-2050 horizon 1,837 lives are estimated to be saved (0.5% reduction relative to the baseline) and 17,562 serious injuries avoided in PO-C relative to the baseline.

The other measures included in the policy options are expected to have a marginal positive or neutral effect on road safety and their impacts are not further quantified. A detailed qualitative assessment is provided in Annex 10.

Thus, all policy options result in a reduction in the number of fatalities and injuries relative to the baseline scenario. PO-C shows the highest reduction relative to the baseline, followed by PO-B and PO-A. The impact in 2025 (the first year of the assumed application of the revised Directive) is assumed to be zero as the behavioural change is only expected in the year following that of a successfully implementation. As the number of road victims in the baseline is decreasing over time (mainly due to the deployment of intelligent speed assistance systems which is expected to lead to fewer speed-related accidents), the impact of the revised Directive in relation to the baseline also decreases over time.

Table 7: Cumulation reduction in the number of fatalities and injuries in the POs relative to the baseline, for 2025-2050[172]

	PO-A	PO-B	PO-C
Fatalities	48	1,153	1,837
Serious injuries	466	11,020	17,562

[171] Source: COWI, Ecorys and NTUA (2022), Impact assessment support study
[172] Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

Total fatalities and injuries avoided	514	12,173	19,399

Table 8 provides the reduction in the external costs of accidents relative to the baseline, expressed as present value over the 2025-2050 horizon, in 2021 prices. The 2019 Handbook on the external costs of transport[173] has been used to monetise the costs. According to the Handbook, the external cost of a fatality in 2021 prices is estimated at around EUR 3.6 million and that of a serious injury at around EUR 0.5 million.

Table 8: Reduction in the external costs of accidents in the POs relative to the baseline, expressed as present value over the 2025-2050 horizon, in 2021 prices (million EUR)[174]

	PO-A	PO-B	PO-C
Fatalities	123.3	2,896.1	4,611.7
Serious injuries	182.6	4,216.4	6,715.0
Total fatalities and injuries	305.9	7,112.6	11,326.7

As a result of the positive impacts on lives saved and injuries avoided presented above, PO-C shows the highest impact in terms of reduction in the external costs of accidents relative to the baseline (expressed as present value over the 2025-2050 horizon), estimated at EUR 11.3 billion. It is followed by PO-B with EUR 7.1 billion and PO-A with EUR 0.3 billion.

6.2.2 Impact on fundamental rights

The policy options were assessed to determine if they have an impact on the fundamental rights and equal treatment of EU citizens. The starting point of the assessment of the fundamental rights is the Charter of Fundamental Rights of the European Union[175]. The assessment identified several potentially relevant fundamental rights: protection of personal data (Article 8), non-discrimination (Article 21) and freedom of movement and residence (Article 45). In addition, the assessment was also made regarding equal treatment, which goes beyond the fundamental right of non-discrimination and ensures that resident and non-resident offenders are treated in the same way.

All policy options will be aligned with the latest legislation on the protection of personal data (GDPR and Regulation (EU) No 2018/1725) through the improvement of RESPER, the network for the exchange of information on driving licences (PMc4) and through establishing the EU digital driving licence (PMc9). The clear definition of the cases where RESPER can be used will remove the existing legal ambiguities which constitute a risk on the personal data of drivers. The use of the eIDAS features for the EU driving licence, in particular the electronic identity for enrolment and the EU Wallet for the storage and exchange of data will ensure a high level of security and privacy of the information handled. It should be however highlighted that the increased use of digital tools will result in new privacy risks.

The transition to the EU digital driving licence is not expected to exclude certain categories of the population. Indeed, while the digital driving licence will be issued by default, everyone will be able to obtain a physical driving licence by choice.

Although the number of persons having their freedom of movement hindered because of unnecessary or unjustified procedures related to driving licences may be low, the consequence for individuals can

[173] https://op.europa.eu/en/publication-detail/-/publication/9781f65f-8448-11ea-bf12-01aa75ed71a1
[174] Source: COWI, Ecorys and NTUA (2022), Impact assessment support study
[175] OJ C 326 of 26.10.2012 p.2

be significant, when they cannot obtain or keep their driving rights. In that respect, all policy options are expected to contribute positively to the freedom of movement. The clarification of the concept of normal residence (PMc8) should solve the problem of determining the issuing authority just after the transfer of residence. The simplification of the rules on administrative validity (PMc11) will put the holders of EU driving licences on an equal footing, regardless in which country they apply for an extension of the licence. The mutual recognition of optional equivalences (PMc12) will allow holders of driving licences to enjoy rights granted by an optional equivalence also in other Member States applying the same rules. The mutual recognition of driving disqualifications (PM4) and of rules on penalty points (PM5) will give procedural safeguards to non-resident drivers who commit road safety traffic offences and ensure that their fundamental rights are respected. A positive impact on the freedom of movement is foreseen also in the case of holders of driving licences issued by third countries (in case the licensing system of the third country concerned is similar to the one in the EU in terms of road safety), which will allow for easier access to EU driving licences. This latter could positively affect around 25,680 to 27,100 persons each year[176].

Besides these impacts on fundamental rights which are common to all three policy options, PO-C is expected to bring a positive impact to drivers from third countries holding an EU licence for at least 5 years and not having committed serious road traffic offenses, as well as EU drivers with licences issued in third countries (but formerly holding an EU one). Code 70, which will be removed in such cases, concerns 7, 235 and 7,552 persons in 2030 and 2050 respectively[177].

PO-B and PO-C are also expected to have a positive impact on the right of non-discrimination, given they will provide flexibility for the first issuance of driving licences in case of restrictions related to languages (PM9), which will allow applicants to choose where to take the tests; it concerns between 41,816 and 75,951 persons each year[178].

In conclusion, all policy options contribute to the protection of fundamental rights and to equal treatment of road users. However, given the number of drivers that are concerned by the additional measures on drivers from third countries and those concerned by the language provisions, PO-B and PO-C are expected to bring a higher positive impact.

6.2.3 Impact on fraud

Regarding driving licence tourism, RESPER enables authorities to verify if driving rights exist or have been revoked in another country. In addition, the measure related to normal residence (PMc 8) would contribute to a reduction in the number of cases where a person can justify a normal residence in more than one country and abuse this situation to escape from the consequences of a road-traffic offense.

Regarding fraud and forgery, the fraudsters also benefit from the evolution of technologies and the risk remains present, mainly linked to forged driving licences using old models. The obligation of the current Directive for all driving licences to comply with the new model (plastic card) by 2033 is expected to significantly mitigate the issue. In addition, the improvement of RESPER (PMc 4), in particular in terms of responsiveness, should help the police in the verification of driving rights, notably when suspecting a case of forgery.

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[176] Source: COWI, Ecorys and NTUA (2022), Impact assessment support study
[177] See section 6.1.3
[178] Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

However, it should be stressed that the introduction of the EU mobile driving licence (PMc 9) is expected to have the biggest contribution to the fight against fraud and forgery. A wide deployment would indeed result in less time for verification (almost immediate with a digital driving licence) and therefore more time to assess the authenticity of physical driving licences.

6.3 6.3 Environmental impact

All policy options are expected to have a positive impact on the environment, albeit a small one. By including new rules on automatic gear transmission and increasing the maximum mass for most of the zero-emission vehicles in category B[179], they will facilitate the uptake of such vehicles, thus contributing to the objectives of the EU Smart and Sustainable Mobility Strategy[180] and the European Climate Law[181].

Currently only large vans (including camper vans) over 3,500 kg are technically classed as a heavy goods vehicle (HGV), requiring a higher class of licence (category C or C1 instead of B). However, the same type of alternatively fuelled vehicles have an increased mass compared to their petrol and diesel counterparts. This is due to the additional weight of their powertrain, for example the battery. The amendment of the definitions of vehicle categories for cars and vans regarding maximum mass (PMc3) will allow holders of a category B driving licence to use alternatively fuelled vehicles (vans and campers) of up to 4,25t, without a trailer. It is expected to have a positive impact on the transition from fossil-fuelled vehicles for this category of road users.

In addition, new rules on automatic gear transmission (PMc2) should contribute positively to the transition to zero-emission vehicles. Indeed, the development of alternatively fuelled vehicles (hybrid, electric and hydrogen) will gradually lead to the prevalence of automatic transmission in vehicles. Consultation activities have shown that driving schools have no incentives to include automatic gear box cars for training, while the candidates do not want to undergo an additional full practical exam with a manual gear box to have removed the restriction on automatic gear only. Over time, automatic gear transmission will become the norm in the EU in line with the baseline scenario projections. Learners will do their driving training and tests increasingly in an automatic transmission vehicle while the need for an additional driving test to use manual transmission will decrease. Consequently, the new rule on automatic gear transmission (PMc2) will allow for more training on zero-emission vehicles during the transition from fossil-fuelled vehicles, indirectly contributing to this change.

Finally, a marginal positive impact is expected from the introduction of digital driving licences by default from 2028 (PMc9), which means that drivers will no longer have to carry a physical licence anymore for driving in the EU (or in a third country recognising the EU digital driving licence). It was estimated[182] that approximatively 130 tonnes of plastic (polycarbonate) can be saved annually because of the introduction of the digital licence. Moreover, the possibility to print a QR code in the space reserved on physical driving licences for a microchip (PMc10) is expected to reduce the amount of silicon used to produce the microchip by 0.2 tonnes per year. This development is also in line with the EU's objective to become more independent in terms of supply chains of raw materials, as stated

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[179] There is not necessarily the case of biofuels for example.
[180] COM(2020) 789 final https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52020DC0789
[181] Regulation(EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 (OJ L 243, 9.7.2021, p. 1).
[182] Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

in the 2022 Strategic Foresight Report. Moreover, the initiative's objective to increase the uptake of mobile driving licences is also likely to spur the twinning between the digital and green transitions[183].

The impact on the environment of the other policy measures is not expected to be significant and has not been quantified. Following the analysis above, no significant harm is expected on the environment by any of the policy options.

7 7 HOW DO THE OPTIONS COMPARE?

7.1 7.1 Effectiveness

The assessment of effectiveness looks at the extent to which the general and specific objectives (SO) of the intervention are met. Table 9 provides the link between policy objectives and assessment criteria.

Table 9: Link between objectives and assessment criteria

General objectives	Specific objectives	Assessment criteria
The general objectives are: (i) improve road safety; (ii) facilitate the free movement of persons in the European Union	SO1 - Improve driving skills, knowledge and experience and reduce and punish dangerous behaviour	Standards on skills, knowledge, and probation periods to be met for the first issuance of a driving licence are harmonised Dangerous behaviour abroad is more coherently punished
	SO2 - Ensure adequate physical and mental fitness of drivers across the EU	Drivers are regularly medically screened, depending on their health status and age
	SO3 – Remove inadequate or unnecessary barriers affecting applicants and holders of driving licences	Mobile driving licence recognised across the EU Removal of cases where normal residence is an obstacle to exercise or maintain driving rights

All options contribute to the **general objectives** by facilitating the free movement of all EU residents and by reducing the number of road traffic accidents, notably those involving novice drivers. PO-B is expected to result in a higher decrease of the number of accidents than PO-A for all drivers, and especially for novice drivers. All policy options will remove more obstacles to free movement, for applicants and for holders of driving licences. PO-C is more effective than PO-B and PO-A, because it is expected to bring an additional decrease of the number of road accidents and to facilitate the free movement also for former holders of licences issued in third countries having their residence in the EU.

Concerning **SO1**, all options are expected to reduce road fatalities, notably those of novice drivers, with the update of the standards on skills and knowledge to be met at the driving test. PO-B and PO-C are expected to perform better than PO-A with the expected reduction of road accidents for novice drivers due to the introduction of a probation period and related stricter rules in this period. In addition, both PO-B and PO-C will introduce a recommendation on lifelong training for all drivers. They are also expected to address impunity for dangerous behaviour on the road while driving in another Member State by introducing the mutual recognition of driving disqualifications. PO-C is however expected to be the most effective, albeit only marginally, as an additional reduction of road accidents is expected due to rules on the recognition of penalty points for drivers committing offenses abroad.

[183] https://ec.europa.eu/info/strategy/strategic-planning/strategic-foresight/2022-strategic-foresight-report_en

Concerning **SO2**, the effects of PO-A are expected to be marginal and they can mainly be attributed to the adaptation to medical progress while monitoring certain diseases (e.g. diabetes). PO-B is expected to contribute to improving road safety more, due to the mandatory screening of medical fitness at renewal, based on self-assessment, and more frequent medical screening for drivers aged 70 years or more. PO-C is expected to be the most effective due to a more advanced medical screening and frequent verifications extended to drivers older than 65, which will be mandatory every 5 years.

Concerning **SO3**, all options are expected to remove unnecessary barriers for applicants and holders of driving licences. The main contribution to SO3 will come from the introduction of the mobile driving licence. All policy options will also resolve problems regarding normal residence faced by certain persons changing their residence to another Member State. PO-B and PO-C are expected to perform better than PO-A at removing the unnecessary barriers, facilitating the access to driving licences for professional drivers and for applicants which are not fluent in the language of their country of residence. They will also remove obstacles affecting holders of driving licences issued in certain third countries who will be able to obtain an EU driving licence when establishing in the EU. PO-C is expected to be marginally the most effective in addressing SO3, since it will in addition remove or reduce administrative barriers affecting persons which are not covered by the other options, notably former holders of licences issued in third countries who already established their residence in the EU and agricultural workers engaged in cross-border activities.

7.2 7.2 Efficiency

Efficiency concerns "the extent to which objectives can be achieved for a given level of resource/at least cost". In all policy measures, the benefits outweigh by far the increase in costs, relative to the baseline. The costs and benefits are summarised in Table 10.

Table 10: Summary of costs and benefits of policy options – net present value for 2025-2050 compared to the baseline (in million EUR), in 2021 prices[184]

	Difference to the baseline		
	PO-A	PO-B	PO-C
Member States administrations			
Adjustment costs	63.2	63.2	63.2
Enforcement costs	-	26.3	75.3
Enforcement cost savings	2,830.6	2,830.6	2,830.6
Administrative cost savings	1,969.3	1,969.3	1,969.3
European Commission			
Adjustment costs - ongoing	0.6	0.7-1.1	0.7-1.1
Citizens			
Adjustment costs	52.5	716.2-1,159.1	7524.9-10,013.4
Administrative cost savings	2.3	2.3	21.5
Adjustment cost savings	2,477.5	4,891.4	2,477.5
Hassle cost savings	1,697.2	1,697.2	1,697.2
Businesses			
Adjustment costs	-	57.7	57.7
Administrative cost savings	-	875.3	875.3
Hassle cost savings	587.0	587.0	587.0
Reduction in the external costs of accidents			
Total fatalities and injuries	305.9	7,112.6	11,326.7
Fatalities	123.3	2,896.1	4,611.7

[184] Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

	Difference to the baseline		
	PO-A	PO-B	PO-C
Member States administrations			
Injuries	182.6	4,216.4	6,715.0
Total costs	116.3	864.1-1,307.5	7,721.8-10,210.8
Total benefits	9,869.7	19,965.7	21,785.1
Net benefits	9,753.4	18,658.2-19,101.6	11,574.3-14,063.3

The major cost element of the policy options, except for PO-A, consists of adjustment costs for citizens related to the rules on medical screening (PO-B and PO-C). Other significant groups of costs, included in all policy options, are adjustment costs for Member States administrations for setting up the technical solutions to support the mutual recognition of the mobile driving licences and administrative costs for citizens related to the updating of standards on skills and knowledge to be met for the first issuance of a driving licence.

PO-A, including only measures common to all options, shows the lowest ***total costs*** estimated at EUR 116.3 million relative to the baseline, expressed as present value over 2025-2050. PO-B shows significantly higher costs, estimated at EUR 864.1 to 1,307.5 million relative to the baseline, expressed as present value over 2025-2050. The main difference in terms of costs between PO-A and PO-B is due to the rules on simple medical screening and the mutual recognition of driving disqualifications in PO-B. PO-C shows the highest total costs estimated at EUR 7,721.8 to 10,210.8 million relative to the baseline, expressed as present value over 2025-2050. Again, the difference in costs between PO-B and PO-C is driven mainly by the rules on medical screening, which become more stringent at renewal and the medical screening becomes more frequent after a driver reaches the age of 65, and to lower extent by the rules on consequences of penalty points for non-residents.

All policy options show significant ***total benefits***, linked to the reduction in the external costs of accidents driven by the lives saved and injuries avoided, but also due to the mutual recognition of the mobile driving licences that leads to administrative cost savings and enforcement cost savings for Member States administrations and hassle cost savings for citizens and the private sector. PO-A shows the lowest total benefits estimated at EUR 9,869.7 million relative to the baseline (expressed as present value over 2025-2050, in 2021 prices). PO-B shows significantly higher benefits, estimated at EUR 19,965.7 million, expressed as present value over 2025-2050 relative to the baseline. The main differences between PO-A and PO-B in terms of cost savings are related to the medical screening for drivers, which will reduce the number of medical checks of elderly people, the removal of the staging requirement to obtain a licence of category CE or DE for professional drivers, but also due to the considerable reduction in the external costs of accidents. PO-C shows higher benefits than PO-B, estimated at EUR 21,785.1 million (expressed as present value over 2025-2050, in 2021 prices) relative to the baseline, mainly due to the higher reduction in the external costs of accidents brought about by the lives saved and injuries avoided.

Overall, all policy options result in ***net benefits*** relative to the baseline. The net benefits are estimated at EUR 9,753.4 million in PO-A relative to the baseline, expressed as present value over 2025-2050, at EUR 18,658.2 to 19,101.6.1 million in PO-B and EUR 11,574.3 to 14,063.3 million in PO-C. The net benefits are highest in PO-B, followed by PO-C and PO-A. PO-C shows the lowest benefit to cost ratio (2.1 to 2.8), followed by PO-B (15.3 to 23.1) and PO-A (84.9).

7.3 7.3 Coherence

Internal coherence assesses how various elements of the revised Directive function together to achieve the objectives. Although all three POs address the identified problems, they do so in different

ways, and with a different level of intervention. PO-A addresses the problems and objectives with a mix of policy options that are common also to the other two options. PO-B and PO-C require further harmonisation and thus ensure a higher degree of internal coherence than PO-A. Since the revision also deals with matters related to the enforcement of sanctions (i.e. mutual recognition of driving disqualifications in PO-B and PO-C), particular care is taken not to exceed what is essential to achieve one of the main objectives of the initiative, which is to improve road safety. The legal examination referred to in part 3.1, identified Article 91(1) TFEU to be the correct legal basis for the adoption of such measures. Nevertheless, as the mutual recognition of decisions/judgments are principally covered by Title V of Part Three of the TFEU (judicial and police cooperation), these measures will need to be drawn up carefully to avoid elements that should be regulated under one of the legal bases provided therein. This is relevant for both options PO-B and PO-C.

External coherence concentrates on the compliance of the initiative with national policies, other EU instruments and relevant EU policies, as well as international obligations. All identified policy options show strong links to several EU instruments. The vehicle categories for mopeds, motorcycles, tri- and quadri-motorcycles are defined on the basis of the type approval regulation for these vehicles[185]. The exchange of information related to driving licences, including for the EU mobile driving licence, have to be aligned with relevant rules on data protection. The introduction of the EU mobile driving licence relies on the eIDAS initiative whose legislative proposal[186] is still discussed by the co-legislators and certain technical features are not yet consolidated in detail. Specific attention will be required to ensure the coherence between the initiatives on eIDAS and on driving licences, notably regarding the compatibility of the ISO/IEC 18013-5 standard and the relevant judicial and police rules for road traffic.

The compliance with the UNECE conventions on road traffic (Geneva 1949, Vienna 1968) will remain in place in all policy options. Specific measures such as sub-categories (e.g. A2) or equivalences will continue to be relevant only on the territory of the EU/EEA Member States. The EU mobile driving licence introduced by all policy options will be subject to this limitation and that is the reason why it will still be possible to carry a physical driving licence. In addition, measures in relation to road traffic offenses (PMc 4 in all policy options, PM 4 in PO-B and PM 5 in PO-C) will ensure coherence with national laws relevant to that matter. The mutual recognition of driving disqualifications of foreign drivers, introduced in PO-B and PO-C, is designed in a way not to interfere with national legislations, especially as regards the definition and classification of what constitutes an offence (irrespectively of their criminal or administrative nature), and the national rules of procedure (including enforcement) that govern criminal and administrative offenses.

7.4 7.4 Subsidiarity and proportionality

The intervention at EU level is needed to facilitate free movement through harmonised rules on driving licences, as Member States on their own cannot ensure the seamless recognition of the right to drive provided by a driving licence issued by another Member State. Regarding road safety, the majority of Member States cannot contribute to the EU targets on road safety on their own, as the quality of the training and of the licensing systems of other Member States influences their policy intervention (e.g. cases of numerous tourists on the roads of France or Spain during the months of July and August). Member States could conclude bilateral and multilateral agreements, but cooperation would remain fragmented as these agreements would not be harmonised and applicable elsewhere in the EU. A transparent, efficient, and coordinated approach with equal treatment of road

[185] Regulation (EU) No 168/2013 (OJ L 60, 2.3.013, p. 52)
[186] COM(2021) 281 final of 3.6.2021 (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021PC0281)

users on EU roads is therefore needed. As all policy options ensure a harmonisation of the legal framework, the requirement of subsidiarity is fulfilled.

Possible issues related to **subsidiarity** are mainly related to the measures on the mutual recognition of driving disqualifications (PM4 for policy option PO-B and PM5 for PO-C), with a higher likelihood of possible subsidiarity issues for PM5 given the larger scope of this measure (i.e. the related offences include recidivism in addition to speeding and drink driving for PM4).

The definition and effects of offenses are established by national road traffic rules, including recidivism (penalty points). The initiative does not aim at regulating these aspects at EU level. It will only provide a legal instrument to enable the mutual recognition of driving disqualifications resulting from speeding, drink driving (PM4, PM5) and penalty points (PM5).

It is worth noting however, that since the decision to issue or withdraw a driving licence forms part of a Member State's sovereignty, it is not possible to unilaterally adopt rules on the mutual recognition of driving disqualification measures issued by other Member States. The recognition of driving disqualifications requires an agreement between the Member State that issued the decision and the Member State that executes it, which cannot be achieved only through national rules. In the absence of such an agreement, Member States can act only with an effect limited to their territory, in case they wish to restrict the validity of such documents. The Union-wide effects of a driving disqualification will therefore always be dependent on the actions of the Member State that issued the driving licence, but which without an EU intervention usually does not have the necessary information, legal instruments, or incentive to act.

Following the Court of Justice of the European Union's interpretation of the Directive, even in cases where the disqualification was enacted by the Member State that issued the driving licence, if the offender changes the normal residence and he/she is issued a new driving licence, every Member State must accept it. This includes the place of their previous normal residence that decided on the disqualification. As this case law is underpinned by the principle of mutual recognition of driving licences, it can only be sufficiently addressed by EU legislation.

From a legal point of view, the only viable alternative of EU action would be bi- or multilateral treaties. However, experience shows that this alternative is only theoretical. There is only one such bilateral agreement in place (between Ireland and the United Kingdom). Several Conventions in the past (1964, 1976) tried to address the issue of driving disqualification in the framework of the Council of Europe. However, they were not ratified by enough Member States to be effective.

Furthermore, the legal examination concluded that it is not possible to use in the same legislative instrument a dual legal basis, i.e. common transport policy legal basis together with the legal basis contained within Title V of Part Three of the TFEU (judicial and police cooperation) due to the Treaty-based procedural specificities and legal effects of acts based on Article 82 TFEU. Consequently, two separate legal acts on the two respective legal bases would be required in case the mutual recognition of driving disqualifications was to be ensured for administrative and criminal offenses alike.

Finally, driving disqualifications can be covered under the transport legal basis in so far as the offence in question qualified as administrative by nature and would be disqualifying in both Member States, the one where it is committed and the one of issuance/residence (principle of 'dual disqualification'). This should apply to penalty points as well. Therefore, as regards penalty points the measure is designed in a way that it is not affected by the difference between road traffic rules across Member States. The principle is to extend the mutual recognition of driving disqualifications resulting from offenses of drink driving or speeding (PM4) to driving disqualifications resulting from an excessive

number of penalty points, in cases where such a sanction is already provided for by both Member States based on the penalty points issued for the conduct.

Points of attention, in particular not to interfere with the national constitutional and JHA[187] frameworks, have been identified and should be fully taken into account when offences fall under criminal law. However, it should be underlined that during the consultation activities, one Member State (Germany) expressed the view that such a measure would exceed the EU competence on police and judicial cooperation and may not be compatible with the Constitution of the Federal Republic of Germany.

In addition, questions of subsidiarity regarding other measures such as the assessment of medical fitness to drive (PM6 for policy option PO-B, PM7 for PO-C), rules on administrative validity (PMc 11 for all policy options) and requirements related to theminimum age for different licence categories (PM 1 for policy options PO-B and PO-C) are not expected because these aspects are already covered to a certain extent by Articles 4 and 7 of the current Directive:

- Regarding medical fitness, the relevant measures (PM 6 for PO-B and PM 7 for PO-C) will slightly expand the scope of the Directive with the introduction of a mandatory screening for category A and B licences. However, it should be noted that similar requirements already exist in the Directive, notably for categories C (trucks) and D (buses) where medical assessment is required at renewal and replacement of the licences.

  It should also be added that the principle of mutual recognition of driving licences is anchored on the principle that drivers from different Members States have an equivalent level of aptitude to drive both in terms knowledge, training but also of physical health. Allowing physically unfit drivers to exchange their driving licenses in Members States with a more refined health screening system could put at stake the trust of the whole EU system of exchange of driving licences. It could also affect road safety, because it would allow drivers with different levels of fitness to drive on EU roads.

  Finally, it can also be reported that no issue has been raised on the basis of Article 168 TFEU[188] regarding the feasibility of such measures. Indeed, measures which aim to harmonize the medical fitness assessment of drivers can be considered an important element of the mutual recognition of driving licenses and, while medical in nature, they are not related to measures of public safety as defined in Article 168 TFEU.

- Regarding the administrative validity, it should also be noted that the planned new duration of validity (15 years) is already in place in 12 Member States (AT, CY, CZ, DE, DK, FI, FR, EL, LU, PL, PT, SK) and no opposition has been expressed during the consultation activities when considering this specific measure (PMc 11). Allowing to issue driving licences for temporary foreign workers for the duration of their residence permit should be considered as an optional and temporary derogation, which Member States decide upon.

- Regarding minimum age, it should first be noted that the measure on reducing minimum age(s) required for obtaining a driving licence was discarded. The only measure retained with an impact on age is PM1, which sets rules on accompanied driving for drivers between 17 and 18 years old, and it applies after they pass the driving test for driving licences B and C. Subsidiarity is therefore respected because if Member States were allowed to create divergent national regimes this would constitute a discrimination

[187] Justice and Home Affairs
[188] Art. 168 TFEU - (ex Article 152 TEC) (lexparency.org)

between those young people that would have the possibility to drive before reaching majority, and those who would not. This argument is particularly relevant for category C driving licences, because this would mean that candidate drivers from Members States that would not accept accompanied driving before 18 years, would only start their professional training one year later than candidates from Member States with those systems in place. In addition, this could also change the level playing field between Member States in tackling driver shortage, because those Member States having a system of accompanied driving will have prepared professional drivers sooner than those who do not. Finally, besides improving the quality of training, the goal of accompanied driving is the reduction of fatalities in which young drivers are involved.

In relation to **proportionality**, the proposed revision aims to improve road safety and to facilitate the free movement of persons. PO-A contributes to this objective by updating the existing provisions of the Directive, taking into account technological, scientific and societal evolutions. The measures proposed under PO-A are therefore considered to be proportionate in view of the objectives of the revision.

PO-B in addition reinforces the EU intervention to ensure that drivers on EU roads are fit to drive and resolves some specific issues of free movement. The measures proposed under PO-B are proportionate in view of the objectives of the revision.

PO-C builds on PO-B but reinforces it, with the intervention regarding the measures that affect third country drivers, dangerous behaviour and persons physically or mentally unfit to drive. The stakeholders' views are divided, and while some Member States consider that the rules on fitness to drive and on driving licences issued by third countries are sufficient, others believe that there is a need for further action.

Regarding **medical fitness**, PO-A takes into account the evolution of health care and technologies (PMc 5), to clarify the use of technologies to offset medical unfitness to drive (PMc 6) and to facilitate the exchange of information on this specific topic between authorities (PMc 7). It does not change the general approach to medical fitness to drive established by the Directive. The policy options PO-B and PO-C however modify the way in which the medical fitness to drive of drivers and applicants is verified. Both PM 6 and PM 7 introduce a system of screening, considering the best practices notably implemented in Sweden and shifting the age-focused approach of the current Directive to a system allowing a progressive identification of a driver's or applicant's fitness to drive. PM 7 includes a more strict screening resulting in higher adjustment costs for drivers and applicants but also in a higher rate of detection of cases of unfitness to drive. Finally, PM 10 simply provides for additional freedom of movement with the mutual recognition of medical fitness assessments, considering that the systems implemented in all Member States will be sufficiently aligned for such a recognition.

Considering **the foresight** megatrend "Accelerating technological change and hyperconnectivity", the need to hold a driving licence is expected to become obsolete when full automation will be in place because the driver's role will become extremely limited or marginal. However, introducing consolidated rules on driving rights also for highly automated vehicles would result in a risk to have them changed in the foreseeable future, either because of the lessons learnt in the field or to become interoperable several times with international partners. Such an approach would not be proportionate in the absence of a common and mature approach on automated vehicles at international level and it would create legal uncertainty for the market. Each policy option includes the update of standards on skills and knowledge applicable to drivers (PMc1) which provide sufficient flexibility to adapt the rules to automated vehicles for the cases where the driver may be requested or may decide to take back the control (levels 3 and 4 of automation).

8 8 PREFERRED OPTION

8.1 8.1 Identification of the preferred policy option and stakeholder views

Regarding **effectiveness,** the impact assessment concludes that all options will contribute to the general objectives of the initiative by 1) facilitating the free movement of all EU residents and by 2) reducing the number of road traffic accidents, notably those involving novice drivers.

When addressing specific objective 1 (Improve driving skills, knowledge and experience and reduce and punish dangerous behaviour), all options are expected to reduce road fatalities. However, PO-B and PO-C are expected to be more effective than PO-A, due to the expected reduction of road accidents for novice drivers (the introduction of a probation period and stricter rules for novice drivers).

In the OPC, 5,787 out of 7,532 respondents stated that improving the provisions of the Directive on the standards on drivers' skills and knowledge is extremely/very important to meet EU road safety targets and to remove the obstacles to free movement. This was reinforced during the workshops, where it was highlighted that sustainable mobility and multimodality should be promoted during training programmes (Italy, ECF). Also, a majority of respondents (53%, 5,073 out of 7,532) stated that EU rules on driving skills affecting the emission and energy consumption of vehicles is relevant for the EU objective of climate neutrality by 2050.

Both PO-B and PO-C are expected to address dangerous behaviour on the road while driving abroad in the EU, by introducing the mutual recognition of driving disqualifications. In terms of this specific objective, PO-C is expected to be the most effective, but only marginally, which is due to the fact that it is the only option that introduces rules on penalty points for drivers committing offenses abroad.

A large majority of respondents to the OPC (68%, 5,146 out of 7,532) stated that it is very/important that the scope of the Directive is expanded to include rules on the mutual recognition of driving disqualifications. Most stakeholders[189] supported the mutual recognition of driving disqualifications during the workshop and the targeted interviews. However, NL raised some legal concerns, while DE was the only stakeholder to firmly disagree with the mutual recognition.

Overall, many stakeholders were supportive of the mutual recognition of driving disqualifications, especially when it comes to offenses related to speeding and drink/drunk driving. This was confirmed in the OPC, where about 6,106 (81%) and 4,966 (66%) out of 7,532 respondents, considered the mutual recognition of driving disqualifications resulting from driving under the influence of alcohol or of drugs and from speeding as very/important for the revision of the Directive respectively. Specificially, when asked which offences should be mutually recognised in the EU, 87% of respondents to the OPC (6,586 out of 7,532) chose driving under the influence of alcohol and drugs and 46% (3,470 out of 7,532) selected speeding. In the targeted interviews, the ETSC, as well as ACEM and the DKU expressed support for the mutual recognition of driving disqualifications resulting from speeding, drink/drunk driving. SE, SI and BE were also supportive, despite acknowledging the difficulties in finding an agreement with other Member States and with the actual implementation.

Concerning specific objective 2 (Ensure adequate physical and mental fitness of drivers across the EU), the effects of PO-A are expected to be only marginally positive. Both PO-B and PO-C are expected to improve road safety more than PO-A due to the screening of medical fitness. PO-B contains the mandatory screening of medical fitness at renewal, based on a self-assessment, and more

[189] FR, HU, SE, SI, BE, NL, ETSC, FEVR and CEETAR.

frequent medical screening for drivers aged 70 years or more. PO-C is more ambitious – and it includes a more advanced medical screening requirement and frequent verifications extended to drivers above the age of 65, which will be mandatory every 5 years. Again, PO-C is most effective when achieving this objective.

The survey showed that 70% of the non-governmental organisations' respondents (16 out of 23) considered that requiring medical fitness to be screened at driving licence renewal for categories A and B would have a positive impact on road safety. Non-governmental organisations were divided on the impact of this measure on the free movement of drivers: while 35% of the respondents (8 out of 23) believe it will have no impact on the free movement of drivers, 21% (5 out of 23) believe it would increase free movement and 9% (2 out of 23) believe it would decrease free movement.

On the introduction of guidelines/recommendations for a standardised medical screening process for B licences, several stakeholders would support it[190]. DE, on the other hand, would oppose it. In the survey, a majority of respondents from national authorities (13/21) expected a positive impact on road safety from the provision of guidelines/recommendations for a standardised medical screening process for B licences. In the survey, 78% of the non-governmental organisation respondents (18/23) considered that providing guidelines/recommendations for a standardised medical screening process for B licences would have a positive impact on road safety (small positive impact: 10/23; large positive impact: 8/23). The establishment of a platform for the sharing of best practices on medical check procedures adopted in EU Member States was supported by most interviewed stakeholders[191]. In the survey among national authorities, the measure was expected to have positive impacts on road safety by a majority of respondents (13/21). In the survey among non-governmental organisations, 70% of respondents (16/23) found that establishing a platform for efficient sharing of best practices on medical checks procedures would have a positive impact on road safety.

All options are also designed to remove unnecessary barriers for applicants and holders of driving licences (specific objective 3). The main impact here will be brought by the introduction of the mobile driving licence. PO-B and PO-C are expected to perform better to achieve this objective than PO-A. PO-C is expected to be marginally the most effective in addressing this objective, since it will in addition remove or reduce administrative barriers affecting persons which are not covered by the other options, such as former holders of licences issued in third countries who already established their residence in the EU.

Most interviewed Member States[192], as well as other stakeholders (ETSC, ACEM, and DKU) strongly supported the establishment of the mutual recognition of mobile driving licences. Interviewed Member States also called for the interoperability of mobile driving licences, based on ISO standards.

Regarding the costs, the major cost element of the policy options are the adjustment costs for citizens related to the rules on medical screening, which are incurred only in PO-B and PO-C. PO-A shows lower costs than PO-B as it does not cover the rules on simple medical screening and the mutual recognition of driving disqualifications, as it is the case for PO-B. PO-C shows the highest total costs. Again, the difference in costs between PO-B and PO-C is driven by the rules on medical screening.

Regarding **efficiency,** all policy options result in significant net benefits relative to the baseline, with the net benefit being the highest in PO-B, followed by PO-C and PO-A. PO-C shows the lowest

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190 FIA, ETSC, BG and DKU.
191 BG, DE, FI, SE, FIA, ACEM and DKU.
192 BE, BG, DE, NL SE and SI.

benefit to cost ratio, followed by PO-B and PO-A. The benefit to cost ratio is estimated at 84.9 for PO-A, 15.3 to 23.1 for PO-B and 2.1 to 2.8 for PO-C. In terms of efficiency, therefore PO-A gives the best results. This is mainly due to the absence of costs related to the medical screening in PO-A relative to PO-B and PO-C. Also, the difference in costs between PO-B and PO-C is driven by the rules on medical screening, with PO-C showing the highest costs.

On the basis of the assessment of effectiveness of the three options in relation to the specific objectives of the initiative, PO-A is the least performing option and PO-B and PO-C perform similarly, with a marginal advantage for PO-C in the overall assessment of the effectiveness due to the more demanding medical screening requirement and due to reducing administrative barriers for former holders of licences issued in third countries having their residence in the EU. As to efficiency, the best performing option is PO-A followed by PO-B, with PO-C lagging far behind. PO-A performs most efficiently as it does not provide any requirement regarding medical screening, but this also means that it is expected to be less ambitious regarding the general objective of increasing road safety.

Concerning **internal coherence**, PO-A remains coherent with relevant EU legislation while both PO-B and PO-C were assessed in view of possible issues regarding the legal base and the delineation with national legislation on recognising and enforcing decisions related to road traffic offences, which will both have to be considered carefully. In addition, all policy options bear the same risk that the eIDAS rules do not allow for interoperability of mobile driving licences issued in the EU with the ISO/IEC 18013-5 standard. Concerning **external coherence**, PO-A remains coherent with national and other international legislations. PO-B and especially PO-C might lead to issues of external coherence, in particular by interfering too much with criminal law, in particular national legislation on recognising and enforcing decisions related to road traffic offences. In terms of **subsidiarity**, all options fulfil this principle, and they would all bring about the harmonisation of the legal framework, albeit at different levels of ambition. With respect to the **proportionality,** PO-A and PO-B will both achieve the objectives in a coherent and effective way, while leaving the necessary scope for national decision. PO-C may however result in issues of proportionality, due to the high level of policy intervention regarding the fight against dangerous behaviour of drivers (PO5) and unfitness to drive (PO7) resulting in significant changes to the existing approaches in Member States.

Overall, considering the assessment of effectiveness, efficiency, and coherence of the three options, and given that all three options are proportionate and comply with subsidiarity, **the analysis points at PO-B as the preferred policy option**, since it brings the best balance between the objectives which must be achieved (increasing road safety and facilitating the free movement of persons) and costs and benefits incurred.

Stakeholders widely supported the measures common to all policy options, such as on the update of standards on skills and knowledge and those on medical fitness, the harmonisation of the administrative validity of category A and B licences, and the introduction of a mobile driving licence, with some different views expressed on the technical and administrative solutions.

In addition to these measures, measures on training and probation periods in PO-B have been widely supported by administrations and stakeholders although with some potential concerns expressed by certain Member States[193].

In the OPC, about 66% of respondents agreed that it is very/important to extend the scope of the Directive by introducing rules on training and probation periods (including accompanied driving).

[193] SE questioned the need for harmonisation, DE and FI were opposed to certain restrictions

The lack of harmonisation in this area was further emphasised in the workshops (CERT, ETSC). Most interviewed stakeholders (FI, FIA, ETSC, ACEM, and DKU) agreed that rules on training need to be extended to cater for e.g., different weather and traffic conditions. In the OPC, 57% of respondents (4,998 out of 7,532) considered important introducing a minimum number of kilometres or hours of training required to pass a driving test in the revision of the Directive. According to a majority of survey respondents from national authorities (17 out of 22), providing further rules on training would have a generally positive impact on road safety.

Also, EU level recommendations on the content of drivers' training programmes would be welcomed by most interviewed stakeholders (DE, FIA, ETSC, ACEM and SE). The introduction of recommendations on the content of drivers' training programme was considered to have a positive impact on road safety by a majority of survey respondents from national authorities (15/22).

The introduction of common minimum standards of a mandatory probation period was supported by a majority of respondents to the OPC (57%, 4,297 out of 7,532). In the targeted survey, the impact of establishing a probation period was assessed as generally positive for road safety by a majority of respondents from national authorities (15/24).

Regarding the increase of maximum mass for electric vehicles, the measure has been generally welcomed, albeit some stakeholders would prefer to have it in place for all vehicles (for example users of camper vans have expressed the need for an increase of maximum mass but without restrictions related to the type of propulsion). A road safety organisation[194] opposed the measure considering the likely degradation of road safety while four Member States[195] asked to apply the extending measure to all vehicles. Finally, most Member States acknowledged the issue related to licences issued by third countries, but they were of diverging views regarding the proportionality of such a measure.

PO-B is expected to strike the right balance regarding mutual recognition of driver disqualifications for severe offences (PM 4), which was supported by many stakeholders in the public consultation (4,731 respondents out of 7,532, or 62%) as well as stakeholders during the workshop[196], with some raising legal concerns[197]. It also introduces basic medical fitness screening (PM6) which should in stakeholder's view bring positive impacts on road safety, despite the expected increase in costs for businesses and drivers, while PO-C with more stringent rules on medical fitness screening appears more costly and more intervening, hence less acceptable to Member States.

On the basis of what precedes and the analysis above it can be concluded that PO-B is the preferred policy option.

8.2 8.2 REFIT (simplification and improved efficiency)

This initiative is part of the Commission Work Programme 2022 under Annex II (REFIT initiatives), under the heading 'A New Push for European Democracy'[198]. The initiative has an important REFIT dimension in terms of simplification and alignment of the procedures that Member States apply to driving licences. An important cost burden resulting from the Directive on driving licences are the issuance procedures and the production of the physical driving licence because of the large number of EU residents concerned. An important part of simplification and related burden reduction will be

[194] ETSC
[195] DE, BG, FR and FI
[196] FEVR, ETSC, CEETAR, FR, NL, SI, SE, BE
[197] NL, DE
[198] COM(2021) 645 final

the introduction of the EU mobile driving licence. Specifically, it will be easier to obtain, replace, renew or exchange a mobile driving licence as it will be possible to perform the complete procedure on-line. In addition, the harmonisation of the administrative validity of driving licences for group 1 drivers (category A and B licences) will also result in less interaction with the administration because of the less frequent need for renewal of the driving licence (every 15 years instead of every 10 years for the Member State currently applying this rule).

8.3 8.3 Application of the 'one in, one out' approach

PO-B is expected to lead to significant *administrative cost savings for road transport operators* due to the removal of the requirement to hold a licence of category C or D to obtain a licence of category CE or DE (PM8). As explained in section 6.1.1, the annual average reduction in the number of theoretical and practical tests for 2025-2050 is estimated at 510,474 relative to the baseline and the annual average cost savings for 2025-2050 at EUR 48.5 million[199], which implies an average cost per theoretical and practical test for the C and D category licence of EUR 95.

PO-B is also expected to lead to *administrative cost savings for holders of a Code 78 licence* (PM2c). The annual average reduction in the number of practical tests for 2025-2050 has been estimated at 1,184 relative to the baseline and the annual average decrease in the administrative costs for 2025-2050 at EUR 0.1 million, which implies an average cost per practical test of EUR 92.

Overall, PO-B is estimated to lead to ***administrative cost savings for citizens and businesses***, estimated at EUR 48.6 million per year.

9 9 HOW WILL ACTUAL IMPACT BE MONITORED AND EVALUATED?

The revision of the Directive on driving licences will result in the adoption of a fourth act addressing this topic. The first three Directives have already contributed significantly to an improvement of road safety and of the free movement of people, resulting in drivers who are more skilled and knowledgeable and more fit to drive. In addition, the impunity of traffic offenders has been reduced with the introduction of a single driving licence in the EU and the establishment of the RESPER network. At the same time, rules on issuance and exchange of EU driving licences allow most drivers to travel or change residence in the EU without facing significant obstacles or difficulties.

Most likely the changes to be proposed will not have the same impact on the ground as the low hanging fruits that have already been reaped. When it comes to road safety, however, incremental improvements are important as each life saved counts on the way to achieve "Vision Zero" (close to zero fatalities on the EU roads by 2050) – provided that the measures used to achieve this aim are not disproportionate. The preferred policy option is expected to lead to 1,153 lives saved and 11,020 injuries avoided over the 2025-2050 period relative to the baseline.

Since the general objective is the improvement of road safety, the core indicator to measure success of the initiative would be a reduction in the number of road fatalities and the number of seriously injured persons in accidents for which the driver is considered one of the causes. For that purpose, the number of accidents will be considered in total and when certain conditions are met (e.g. the ones involving only one vehicle or those where the driver was a novice or physically/mentally unfit to drive). The indicator will have to also consider overall road safety developments and the evolution

[199] Both the annual reduction in the number of tests and the annual costs savings are calculated as simple averages over 2025-2050 for the purpose of 'one in, one out'.

of road traffic and of the number of driving licences in each Member State (to take account of other possible factors).

In relation to the second general objective of facilitating the free movement of persons, the core indicator to measure success of the initiative would be a reduction in the number of complaints and court cases in relation to the driving licences' procedures.

The indicators related to both objectives will continue however to be relatively difficult to assess because of the multiple underlying causes of accidents, the unavailability of data and the low number of complaints and court cases in relation to driving licences' procedures.

For SO1, the success will be measured by the fact that standards on skills, knowledge, and probation periods to be met for the first issuance of a driving licence are harmonised, and that dangerous behaviour is sanctioned irrespectively of the residence of the offender. For SO2, the share of drivers regularly medically screened, depending on health status and age, will be a measure of success. For SO3, the number of MS issuing mobile driving licences and/or recognising EU mobile driving licences will be a measure of success, as well as a low number of complaints and court cases where normal residence is an obstacle to the recognition of existing driving rights.

The Commission will monitor the implementation and effectiveness of this initiative through several actions and a set of core indicators that will measure progress towards achieving the operational objectives. Five years after the deadline for transposition of the legislative act, the Commission services should carry out an evaluation to verify to what extent the objectives of the initiative have been reached.

Established monitoring instruments (e.g. the CARE database) will be used to monitor the correlation between road accidents and driving licences. The reporting will include information on the number of accidents with injuries and/or fatalities as well as on the drivers involved such as their age, the validity and issuing date of their driving licences and results of their drug/alcohol tests. In order to allow, to the maximum extent possible, to separate the effects of the revised Directive from other factors, statistics on the number of driving licences issued will be retrieved from Member States. It should allow to assess the relative evolution of road safety for the main groups of drivers affected by the revision (e.g. novice drivers, drivers will health conditions).

Statistics will also continue to be produced by the Commission regarding the use of the RESPER network for the exchange of information on driving licences, established under Article 15 of Directive 2006/126/EC. The Commission may also explore the possibility to complement this information with statistics produced by EUCARIS, the application used by several Member States to connect to RESPER.

With respect to the interoperability of the EU mobile driving licence, a dedicated working group under the Committee established under Article 9 of the Directive will monitor the progress with the objective to identify and solve potential issues.

The Commission will also invite Member States to share statistics acquired from national registries, as it has been done in the frame of the support study for this impact assessment, in particular on the number of licences issued per categories, per gender and per age group.

ANNEX 1: PROCEDURAL INFORMATION

1. LEAD DG, DECIDE PLANNING/CWP REFERENCES

The lead DG is DG MOVE, Unit C2: Road Safety

DECIDE reference number: PLAN/2021/10346

Item 25 in Annex II (REFIT initiatives) to the Commission Work Programme 2022

2. ORGANISATION AND TIMING

The impact assessment follows the ex-post evaluation of Directive 2006/126/EC on driving licences published in 2021. The impact assessment started in 2021, with the publication of the inception impact assessment on 23 April 2021[200].

The impact assessment on a possible review of the Directive on driving licences was coordinated by an Inter-Service Steering Group (ISSG). The Commission Services participating in the ISSG were: Secretariat-General (SG), Legal Service (LS), DG Communications Networks, Content and Technology (CNECT), DG Justice and Consumers (JUST), DG Migration and Home Affairs (HOME), DG Climate Action (CLIMA), DG Environment (ENV), DG for Employment, Social Affairs and Inclusion (EMPL), DG Health and Food Safety (SANTE) and DG Industry, Entrepreneurship and SMEs (GROW). The Inter-Service Steering Group met altogether six times: on 31 March 2021, 1 June 2021, 22 July 2021, 24 June 2022, 6 September 2022 and 6 October 2022. It was consulted throughout the different steps of the impact assessment process: notably on all stakeholder consultation materials and deliverables from the external contractor and on the draft Staff Working Document.

3. CONSULTATION OF THE RSB

The Impact Assessment received a positive opinion from the Regulatory Scrutiny Board on 18 November 2022 which made the following main recommendations for improvements:

RSB comments	Modification of the IA report
(1) The presentation of the measures and their implications should be improved. The option description should be detailed enough to allow a better understanding of the functionality of the measures and any trade-offs between different objectives.	In Section 5.2.3, the description of the measures PMc 4, PMc 8, PM 2, PM 3, PM 9, PM 12 and PM 14 has been improved. A new section 5.2.4 has been introduced to discuss the trade-offs between the measures PMc2, PMc 3, PM1 and PM 11.
(2) The report should better explain the feasibility of certain options as regards subsidiarity, for instance, on the mutual recognition of driving disqualification. It should explicitly present any subsidiarity	Section 7.4 has been updated to present the subsidiarity issues related to the mutual recognition of driving disqualifications, including with reference to the views of Member States. Additional information has

[200] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12978-Revision-of-the-Directive-on-Driving-Licences_en

issues and refer to the views of Member States on the measures considered.	also been introduced regarding the measures on minimum age and medical fitness.
(3) The report should better justify the choice of the preferred option. It should provide a more transparent comparison of options, in particular in terms of effectiveness and efficiency.	Section 8.1 has been reinforced to better present the reasons for the choice of the preferred option.
(4) The report should further clarify the impact analysis. It should be more explicit about the costs related to medical screening and explain whether these are (partially) covered by medical insurance schemes in the Member States. It should also more clearly distinguish between the administrative and adjustment costs, in particular in case of the costs for citizens.	In section 6.1, the description of economic impacts for PMc 1 (new standards on skills and knowledge) and PM5/6 (medical fitness screening and assessment) has been updated accordingly. It has also been clarified that the costs for citizens associated to PMc 1 are adjustment costs.

4. EVIDENCE, SOURCES AND QUALITY

The impact assessment is based on several sources, using both quantitative and qualitative data. This includes:

- Ex-post evaluation of Directive 2006/126/EC on driving licences (SWD(2022) 17 final)
- Stakeholder consultation activities (see Annex 2)
- External support study carried out by an independent consortium (lead by COWI)
- Commission experience in monitoring and implementing the Directive
- Community database on road accidents (CARE)

ANNEX 2: STAKEHOLDER CONSULTATION (SYNOPSIS REPORT)

This annex provides a summary of the outcomes of the consultation activities carried out for the review of the DL Directive, including in the context of the external support study. It notes the range of stakeholders consulted, describes the main consultation activities, and provides a succinct analysis of their views and the main issues they raised. The full analysis of the consultation results is presented in the stakeholder consultation report annexed to the support study.

The objectives of the consultation activities were the following:

(1) to collect information and opinions of stakeholders on the key problems and associated drivers, the definition of relevant policy objectives linked to those problems, and the identification, definition and screening of policy measures that could be considered in this Impact Assessment

(2) to gather information and opinions on the likely impacts of policy measures and options.

1. OVERVIEW OF CONSULTATION ACTIVITIES

Consultation activities have taken place in 2021 and 2022, from the publication of the Inception Impact Assessment (IIA) in May 2021, to the Open Public Consultation that closed in May 2022.

As part of the initial feedback mechanism, interested parties had the possibility to provide **feedback on the Inception Impact Assessment** from 23 April to 21 May 2021.

Subsequently, the following targeted consultation activities were carried out:

(1) Two rounds of interviews were held;
- (a) Exploratory interviews during the inception phase (Q1 and Q2 2022)
- (b) In-depth interviews to plug information gaps and assess the expected impacts of policy measures (Q2 and Q3 2021).

(2) Two rounds of surveys were carried out;
- (a) A survey to substantiate the problem analysis (Q2 2022).
- (b) A survey to assess the impact of policy measures (Q2 and Q3 2022).

(3) Three expert workshops were held;
- (a) On training, testing and vehicle categories, on 22 March 2022.
- (b) On issuance and mutual recognition of driving licences on 22 April 22.
- (c) Consequences of road traffic offences and medical fitness on 19 May 2022.

Finally, an **open public consultation** was accessible on the website "Have your Say" from 25 February to 20 May 2022. In total, 7,532 responses were received from different stakeholders. Some stakeholders also provided position papers together with their responses to the OPC. 58 additional written inputs including position papers were submitted together with the OPC responses. It should be noted that, given the number of responses and the method used, this consultation is not a representative survey nor is it analysed as such. The views of the respondents are presented hereafter objectively, without any inference as to what any majority or minority of citizens may think of each topic.

2. STAKEHOLDER GROUPS CONSULTED

This section provides a short overview of the main types of stakeholders identified and targeted as part of the targeted consultation.

Inception Impact Assessment

The IIA was open to the general public and 2,213 responses have been received. Various stakeholders participated in the consultation: academic and research institutions, business associations, company and business organisations, consumer organisations, EU and non-EU citizens, environmental organisations, non-governmental organisations, public authorities, trade unions and other interested stakeholders.

The feedback has been largely focused on the increase of the maximum mass of vehicles that can be driven with a licence of category B (see below). The other feedback has been taken into account and addressed in the following consultation activities, for example in relation to mobile driving licences, optional equivalences, normal residence and driving disqualifications.

Open Public Consultation (OPC)

The OPC was open to the general public and 7,532 opinions have been expressed. Various stakeholders participated in the consultation: academic and research institutions, business associations, company and business organisations, consumer organisations, EU and non-EU citizens, environmental organisations, non-governmental organisations, public authorities, trade unions and other interested stakeholders.

Targeted survey

The targeted survey has been shared with public authorities in Member States and non-governmental organisations, driving schools and driving school associations, road safety organisations, road transport association and/or their members, road users and road users' associations (citizen, drivers motorcyclists, caravan), industry/business associations and/or their members, associations for persons with disabilities, trade unions, international bodies (road safety), car insurance associations, digital service providers, data protection authorities and associations.

Targeted interviews

During in-depth interviews we focused on the following target groups: public authorities in Member States, automotive and motorcycle federations, drivers' associations, driving school associations, European transport workers association, international road transport association, national driving licence authorities, road safety and road users' association, vehicle manufacturer associations, transport safety disability association, driving school associations.

Workshops

Three workshops have been held to discuss with stakeholders and national administrations the following topics:

1. Training, testing and vehicles' categories - 22 March 2022
2. Issuance and mutual recognition of driving licences - 22 April 2022
3. Consequences of road traffic offences and medical fitness - 19 May 2022

The workshops have been announced publicly with a call for expression of interests to participate published on 8 February 2022 on the DG MOVE website201. All entities having expressed an interest have been invited to the workshops, except 14 driving schools established in Ireland to ensure a balance representativeness of the audience[202].

The following stakeholders' groups have been invited: academic and research institutions, transport-related associations, consumer organisations, environmental organisations, non-governmental organisations, road safety advocates, public authorities, trade unions and other interested stakeholders.

The participation to all the consultation activities is presented in the table below.

Stakeholder type	Interviews	Survey	IIA	Workshop	OPC	Total
Academia	0	0	2	7	2	**2**
Business associations	5	14	44	82	178	**197**
EU citizens	0	0	2037	0	7024	**7024**
Non-EU citizens	0	0	36	0	157	**157**
NGOs	9	17	13	9	47	**73**
Public authorities	11	51	5	206	33	**95**
Trade unions	1	0	3	7	3	**4**
Other	0	2	27	0	88	**90**
Total	**26**	**84**	**2213**	**311**	**7532**	**7642**

3. FEEDBACK RECEIVED ON PROBLEM DEFINITION

The excessive number of deaths and serious injuries on EU roads

According to DE, FI, SI, SE and FR their national rules are generally satisfactory and sufficient to deliver on the road safety targets established at the EU level.

Nevertheless, DE, BG, NL, BE, SE and FR called for the updating of standards on physical and mental fitness. Only FI considered the EU standards as adequate.NL identified some room for improvement in its national rules on training, examination and provisional licence system.

In the open public consultation, 70% (5,319 out of 7,532 respondents) and 63% (4,732 out of 7,532 respondents), respectively, evaluated the rules on drivers' skills, knowledge, and experience and drivers' physical and mental fitness to be adequate/very adequate. 55% (3,313 out of 7,532 respondents) also believed the EU rules on drivers' behaviour on the road to be adequate/very adequate. Stakeholders were more divided on the adequacy of the rules to fight unlicensed drivers:

[201] https://transport.ec.europa.eu/news/road-safety-call-expressions-interest-workshops-driving-licences-directive-2022-02-08_en

[202] Only one driving school established in Ireland has been invited, the selection has been based on the completeness of the information provided, in particular regarding the subjects of interest expressed by the stakeholders

40% (3,038 out of 7,532 respondents) considered the rules adequate/very adequate compared to 33% (2,491 out of 7,532 respondents) considering the opposite.

The free movement of persons is constrained by unnecessary procedures related to driving licences

In the open public consultation, when asked to evaluate the current EU rules to facilitate the free movement of people in the European Union, most respondents believed them to be adequate/very adequate. 76% of the respondents (5,745 out of 7,532 respondents) believed the rules on the recognition of driving licences when travelling in another Member State to be adequate/very adequate. Similarly, the rules for renewal, replace or exchange of a driving licence are perceived as adequate/very adequate by about 54% of respondents (3,132 out of 7,532 respondents). However, respondents were unsure on how to evaluate the rules on obtaining a driving licence as a resident in another Member State. Only 42.3% of respondents (3,186 out of 7,532 respondents) believed them to be adequate/very adequate.

4. FEEDBACK RECEIVED ON PROBLEM DRIVERS

Presence of drivers with insufficient skills, knowledge, experience and/or risk awareness on EU roads

In the OPC, a clear majority of respondents rated improving drivers' skills and knowledge as either extremely/very important (about 44%, 3,358 out of 7,532) or important (37%, 2,829 out of 7,532). Stakeholders demonstrated an even greater support for improving drivers' experience and risk awareness: about 54% of respondents (4,137 out of 7,532) rated it as extremely/very important. In the targeted survey, 59% of respondents from national authorities agreed that insufficient driving experience and/or risk awareness in particular of novice drivers is a very/important problem vis a vis road safety (19). In the targeted survey, 74% of the non-governmental organisations agreed that insufficient driving experience and risk awareness of novice drivers is an important problem for road safety (22/30).

During the targeted interviews, DE, BE, NL, BG, FI, SE and FR expressed the need for updating test requirements and standards (integrating new forms of technology, such as autonomous driving, ADAS, eco-driving, the ability to use navigation, knowledge related to alternatively fuelled vehicles and the updates brought by the CPC for professional drivers).

The aspect of insufficient skills and knowledge concerning new safety technologies (e.g., ADAS) was assessed as moderately/important vis a vis road safety by about 50% of respondents in the targeted survey with national authorities (16), whereas only 6% of respondents (2) did not consider it as a problem. 53% of the respondents from non-governmental organisations assessed insufficient skills and knowledge regarding new safety technologies as an important or very important problem (16/30).

Concerning minimum standards for trainers, 41% (13) and 34% (11) of respondents in the targeted survey from national authorities assessed the insufficient skills and knowledge of driver trainers to adequately prepare drivers and ensure they have the skills and knowledge to drive as very/important and moderately/slightly important, respectively. Among respondents from non-governmental organisations, 50% deemed insufficient skills and knowledge of driver instructors to adequately prepare drivers as an important aspect of road safety (15/30).

Concerning examiners, about 41% of respondents from national authorities (13) stated that insufficient skills and knowledge of driving examiners to adequately test applicants a very/important

problem. 47% of respondents from non-governmental organisations found insufficient skills and knowledge of driving examiners to be an important issue (14/30).

Only FR expressed a need for common standards on the probation period for novice drivers, while, 79% of respondents from national authorities (22) confirmed to impose restrictions in the form of probation periods.

In the targeted survey, 56% of respondents (18) from national authorities assessed the insufficient skills and knowledge of all drivers of new mobility solutions with a maximum speed between 25 and 45 km/h as a slightly/moderately important problem. 50% of the respondents from non-governmental organisations assessed insufficient skills or knowledge of drivers of new mobility solutions important or very important (15/30). During interviews, Member States did not believe that an extension of the scope of the Directive to new mobility solutions (e.g. e-scooters), or the creation of specific new vehicle categories for such mobility solutions, could have an impact on road safety.

When it comes to the minimum age for driving, FI considers it should be lowered for B category to enable people in sparsely populated areas of the country to move around. In the OPC, more respondents (43%) had the same position. Other consulted stakeholders, either during interviews or workshops, including DE, SE, ETF, ETSC and DKU indicated that a general lowering of the age for driving with a B licence would have negative effects, although generally supporting accompanied driving at the age of 16.

Non-governmental organisations were divided on the potential impacts of reducing the age limit for B licence to 16 years, while on the issue of requiring accompanied driving onto road safety: 36% of the non-governmental authority respondents considered it would have a positive impact (8), 27% of the non-governmental authority respondents considered it would have a negative impact (6) and 36% of the non-governmental authority respondents did not indicate their opinion (8).

Concerning professional driving and its impact on road safety, some interviewed stakeholders (NL, BE, SI, ETSC, BG, and SE) believed that lowering the age would have negative impacts on road safety. On the other hand, DE supported the lowering of the minimum age for category C licences to 18, whereas FI supported lowering the age for professional driving to 18 years for both C and D licences. FR called instead for more training for professional drivers, especially on risk perception. The lowering of the minimum age for a D licence to 18 years is considered to have no impact (26%), somewhat positive (25%) or somewhat negative impact (15%) on road safety by respondents to the OPC. In the OPC, respondents have identified a need for simplifying the access to licences for commercial vehicles (67%).

Presence of drivers with dangerous behaviour on EU roads

The absence of a clear EU framework for the mutual recognition of driving disqualifications poses challenges when it comes to preventing abuse by drivers, and it impacts road safety. This finding was corroborated by Member States during the targeted interviews. Reducing both dangerous behaviours by drivers and the number of unlicensed drivers seem to be relevant factors for stakeholders that responded to the OPC. In effect, about 55% (5,063 out of 7,532) and 69% (5,201 out of 7,532) of them, respectively, rated them as extremely/very important.

In the targeted survey, a large majority of representatives from national authorities identified the fact that residents and non-residents do not face the same consequences regarding driving disqualification in the EU as a generally important problem (16/21). In the targeted survey, respondents from non-governmental organisations agreed that residents and non-residents not facing the same consequences regarding driving disqualification is an important problem in relation to road safety

(64%). Similarly, they agreed that residents and non-residents not facing the same consequences regarding penalty/demerit points is an important problem in relation to road safety (64%).

National authorities estimated that, on average, the number of offences resulting in driving disqualifications committed per year is in the range of 25,000-above 50,000. The number of driving disqualifications for domestically registered drivers (e.g., driving licence is issued in the same Member State that imposes the disqualification) was estimated in the range 0-5,000. The number of driving disqualifications for drivers registered in another EU Member State (e.g., driving licence is not issued in the Member State that imposes the disqualification) was estimated in the range 0-5,000. The number of driving disqualifications for drivers registered in third countries EU Member State (e.g., driving licence is not issued in Europe) was estimated in the range 0-5,000. More respondents estimated the number of offences resulting in penalty/demerit points committed per year in the range 0-1,000. Slightly more respondents estimated the number of offences resulting in penalty/demerit points for domestically registered drivers (e.g., driving licence is issued in the same Member State that imposes the penalty/demerit point) in the range 0-1,000. The number of offences resulting in penalty/demerit points for drivers registered in another EU Member State (e.g., driving licence is not issued in the Member State that imposes the disqualification) was estimated in the range 0-5,000. The number of offences resulting in penalty/demerit points for drivers registered in third countries (e.g., driving licence is not issued in Europe) was estimated in the range 0-1,000.

Sixteen of 21 national authorities and 13 non-governmental organisations that responded to the targeted survey assessed the fact that fraudulent drivers (with illegally obtained driving licences) continue to drive on EU roads as an important problem for road safety.[203]

Thirteen of 21 respondents to the targeted survey for national authorities and 15 NGOs identified current approaches to the rehabilitation of disqualified drivers as inadequate to keep dangerous drivers off EU roads.

Presence of drivers that are not fit to drive on EU roads

According to OPC results, respondents consider improving the Directive to ensure drivers' physical and mental fitness as either extremely/very important (about 55%, 4,190 out of 7,532) or important (about 30%, 2,274 out of 7,532). In the targeted survey, more respondents from national authorities, (8) confirmed the existence of the problem of inadequate medical screening of all drivers as moderately/important, compared to 4 respondents that did not identify it as a problem for road safety. Ten respondents from non-governmental organisations considered medical screening of all drivers to constitute an important (8) or very important (2) problem for road safety, while 7 respondents find it to be a slightly important (3) or not a problem at all for road safety (4). Overall, non-governmental organisations argued that the focus on medical requirements in Annex III is too narrow and that there is a lack of clinical guidelines and scientifically validated criteria. Indeed age-related requirements are considered to result in suboptimal results, while the focus should be placed on functional requirements to drive. The role of visual function to be fit to drive was emphasised by various stakeholders.

In the targeted survey, we asked representatives from national authorities to indicate estimates on the average number of traffic fatalities from 2019 where drivers' medical condition was a contributing factor. 16 out of 22 respondents estimated a range of 0-25 traffic collisions in 2019 attributed to driver

[203] According to six out of seven respondents, the number of forged EU licences per year per Member State could go up to 500, and the number of traffic collisions that can be attributed to driving licence fraud (e.g., where the offender held a fraudulent licence) per year is also estimated in the range 0-500.

medical condition/fitness to drive, regardless of drivers' age; 15 out of 22 respondents estimated a range of 0-10 traffic collisions in 2019 attributed to driver medical condition/fitness to drive of drivers below 50 years; 17 out of 22 respondents estimated a range of 0-25 traffic collisions attributed to driver medical condition/fitness to drive of drivers above 50 years. The following table details the distribution of estimates on the number of traffic fatalities from 2019 where the drivers' medical condition was a contributing factor per respondent country to the second targeted survey.

Table 11. No. of traffic collisions attributed to driver medical condition/ fitness to drive (second survey results)

Member State	Overall	Below 50 years	Above 50 years
LT	13	3	10
DE	388	223	165
PT	284	102	248
FI	352	-	

When asked to indicate the most common illnesses that are the cause of traffic collision in their respective countries, 10 public authorities responded with the following ranking:

1. Substance dependency (5,4 out of 8)
2. Cardiovascular disease / Epilepsy (4,6 out of 8)
3. Epilepsy
4. Reduced mobility / diabetes mellitus (4,3 out of 8)
5. Mental disorders (4,1 out of 8)
6. Cerebrovascular diseases (3,5 out of 8).

Applicants face difficulties to obtain a driving licence due to inadequate or unnecessary procedures

In the OPC 4,462 out of 7,532 respondents (59%) considered it extremely/very important to remove unjustified obstacles to obtaining driving licences in the Directive.

During interviews, most interviewed Member states found that the definition of normal residence is problematic. The importance of the problem was confirmed by 12 out of 20 representatives from national authorities responding to the targeted survey. In the targeted survey, most of the non-governmental respondents could not assess the importance of the issue of applicants having their application rejected due to difficulties proving their normal residence (12/22).

In the case of first-time issuance of driving licences, applicants can find barriers when it comes to e.g., moving to another Member State after having done a theoretical driving test or a medical examination in their Member State of origin. During the interviews, the lack of mutual recognition of theoretical driving tests has not been acknowledged to have a relevant impact on the freedom of movement of persons in the European Union (FI, SE, and FR). In the targeted survey, only 3 out of 20 respondents from Member State did not consider it a problem, whereas 12 other respondents assessed that it is an important problem, to different degrees. Also, in the case of medical tests taken abroad, all respondents from national administrations stated in the targeted survey that their countries

do not recognise the validity of medical checks administered by authorities in other Member States (AT, BG, HR, DK, FI, LU, PT, SK, SI, and SE).

Another issue that applicants experience is the fact that, when moving to another Member State, they cannot pass the tests to obtain their licence in the Member State of residence if they do not speak the language or English. This was generally perceived as an important problem by a majority of respondents to the targeted survey from national authorities, although to different degrees (14/20). Representatives of national authorities were less convinced of the importance of the following problem (7/20): applicants for graduated access for motorcycles have to pass through cumbersome and costly procedures to obtain their licence. Eighteen Member States indicated that they already offer tests, either theoretical or practical or both, in English and/or allow the use of an interpreter. In addition, some countries offer tests in several other languages (e.g., Norway offers theory tests for category B in Sami, Arabic, Sorani and Turkish; Sweden offers theory tests in 14 languages; Slovakia offers tests in the languages of minority groups living in the country). Furthermore, in the targeted survey country representatives have indicated an average number of 2290 for tests taken by driving licence applicants with support from an interpreter for 2019 (based on targeted survey estimates from Bulgaria, Croatia, Finland, Luxembourg, Malta, Norway, Portugal, Slovenia, and Sweden).

Holders of licences face difficulties to have their driving rights maintained or recognised due to inadequate or unnecessary procedures

Respondents to the OPC stated that removing obstacles to renewing, replacing or exchanging driving licences issued by EU/EEA Member States is extremely/very important (about 58%, 4,428 out of 7,532). Also, the removing of obstacles to renewing, replacing or exchanging driving licences issued by non-EU countries was rated as either extremely/very important (48%, 3,612 out of 7,532) or important (24%, 1,818 out of 7,532).

According to interviewed Member States, the ease of exchanging a driving licence issued by a third country varies substantially across the EU: for instance, BG uses the same requirements for the exchange of driving licences that third countries apply to them, FI exchanges all third country licences without an exam for category 1, SE does not exchange any third country driving licences (with a few exceptions, e.g., Japan, the UK), and FR exchanges licences from 103 countries. It results in very inhomogeneous treatment of third country migrants depending on their EU Member State of residence.

More than half of respondents from national authorities in the targeted survey, considered the issue of third countries' driving licence holders encountering difficulties in exchanging their licence in Member States as an important problem, to different degrees (11/20). The indistinct establishment of the normal residence across Member States can constitute an obstacle to the exchange and renewal of a driving licence. In the targeted survey, representatives from Member States could not estimate the number of cases of requests for exchange or renewal of licences that were rejected due to non-compliance with the requirements on normal residence due to unavailable statistics. In the targeted survey, almost half of the non-governmental authorities could not assess the importance of the issue of exchanging third countries licences with European licences (10/22). The rest were divided with 32% of the respondents finding it to be an important problem (7) and 14% finding it to not be such an important issue (3). When it comes to the issue of recognition of exchanged driving licence after moving to another Member states, over half of the non-governmental authorities could not assess its importance as an issue and 27% of the participating non-governmental authorities considered it to be an important problem (6).

Most of the respondents to the targeted survey from national authorities considered the fact that drivers cannot make use of their digital driving licence when driving on the territory of another Member State a problem (10/18). Only one respondent did not consider it a problem. Interviewed Member States (Bulgaria, Belgium, Netherland, France, Slovenia, Finland, Germany, and Sweden) generally agreed that the lack of introduction of the EU mobile driving licence impacts free movement of those EU drivers that currently hold a digital driving licence. In the targeted survey, half of the non-governmental respondents considered the fact that drivers cannot make use of their digital driving licence when driving on the territory of another Member State as an important (7/22) or very important (4/22) problem when it comes to imposing unnecessary administrative burden and costs on drivers.

When renewing their driving licence in another Member State, drivers have the administrative validity period of their licence affected (reduced), as a different administrative validity period will be applied than the one in their Member State of origin. The importance of this issue in accordance with representatives from Member States responding to the targeted survey is unclear: 7 out of 20 respondents stated that it is an important problem to different degrees, and 7 others that it is not a problem. Also, drivers have to pass additional medical checks if they move to another Member State imposing stricter requirements on medical checks (in case of renewal, exchange of replacement). This was considered as an important problem by more respondents (9/20), than the ones that did not consider it as such (5/20).

In the targeted survey, representatives of national authorities were asked to indicate whether their countries impose stricter rules for professional drivers, drivers above a certain age and novice drivers when it comes to validity periods and medical checks. For the first category, 65% of respondents stated that their countries increase frequency of medical checks, 45% that administrative validity periods are reduced, and 35% responded that other requirements are applied, such as refresher courses. 55% of respondents also indicated that medical checks' frequency is increased in the case of drivers above a certain age. For this category of drivers, 35% of respondents stated that their countries reduce administrative validity periods and the other 35% applies other requirements. For novice drivers, 80% of respondents indicated to apply other requirements, e.g., refresher courses, probation periods, less penalty points etc., whereas 20% responded that administrative validity periods are reduced and 5% that the frequency of medical checks is increased. In the targeted survey, 37% of non-governmental authority respondents considered that drivers having the administrative validity period of their licence affected if they move and want to renew their licence in another Member states as an important issue (8).

Most respondents to the OPC (about 66%) stated that improving the mutual recognition of driving licences is extremely/very important.

5. FEEDBACK RECEIVED ON POSSIBLE SOLUTIONS

Update of standards on skills and knowledge (through theoretical tests and where needed practical tests), to cover driver hazard perception, risk factors related to micro mobility means, advanced driving assistance systems, increasingly automated vehicles, safety of alternatively fuelled vehicles

In the OPC, 5,787 out of 7,532 respondents stated that improving the provisions of the Directive on the standards on drivers' skills and knowledge is extremely/very important to meet EU road safety targets and to remove the obstacles to free movement.

Hazard perception

Most interviewed stakeholders (FI, FR, SE, FIA, ETSC, ACEM and DKU) supported their inclusion in theoretical tests, also through digital means. In the targeted survey, most respondents from Member States assessed the impact on road safety of requiring a theoretical hazard perception test as positive (16/24). Most respondents, however, could not assess the impact of such measure on free movement. Costs for national authorities are expected to somewhat increase (15/24). Costs for businesses are expected either to be possibly increased by the measure (7 non-governmental stakeholders), decreased (4 responses) or experience no impact (8 responses). Moreover, 16 non-governmental organisations found theoretical hazard perception tests to have a large positive impact on road safety and 6 found that it has a small positive impact.

Micro mobility

Some interviewed stakeholders called for a common definition of micro mobility first and more cohesion between the Directive and the type approval regulation (DE and SE). The DKU, FIA and ETSC would support including users of micro mobility under the group 'other vulnerable road users' in the Directive. In the targeted survey, representatives from Member States assessed the impact of including users of micro mobility under the group vulnerable road users as generally positive on road safety (14/24).

Most respondents could either not assess the impact of such measure on free movement (11/24) or assessed that the measure does not yield any impact (6/24). Concerning the costs for businesses, more respondents could either not assess them (9/24) or expected such costs to somewhat increase (6/24). Costs for drivers are expected to somewhat increase (10/24), although about 7 respondents out of 24 could not assess them. Costs for national authorities are generally expected to increase (12/24).

ADAS

Some interviewed stakeholders (FI, ETSC, and FIA) strongly supported the inclusion of ADAS notions in theoretical tests. In the targeted survey, 63% of non-governmental organisations found the inclusion of questions on advanced driver-assistance systems in theoretical exams to have a positive impact on road safety (19. 43% of non-governmental organisations' respondents considered that including questions on advanced driver-assistance-systems in theoretical exams would have no impact on theoretical exams (13). 27% considered that it would have a positive impact (8) and 30% had no opinion (9). Non-governmental organisations are quite divided on whether including questions on advanced driver-assistance systems in theoretical exams would impact business costs. While 27% believe it would have no impact, 17% of the respondents thinks that it would decrease the costs and 23% think that it would increase the costs.

Safety of new technologies

With regards to updating training and testing of new technologies, a majority of respondents to the OPC (about 57%, 4,272 out of 7,532) believed that it should be done on a voluntary basis.

FIA, ETSC, DKU and SE supported during interviews the inclusion of questions related to electric vehicles in theoretical exams. Similarly, 29% of non-governmental authority respondents consider that including road-safety related questions for electric vehicles in theoretical exams would have no impact for national authorities (8/28) and 29% believe it would somewhat (7/28) or substantively (1/28) increase the cost for national authorities.

Climate and environment

The adjustment of training to the needs of climate and the environment seems to be a relevant factor for stakeholders. About 53% of respondents to the OPC believed that the establishment of more stringent standards on eco-driving skills to be met at the driving test can have a positive environmental impact. This was reinforced during the workshops, where it was highlighted that sustainable mobility, multimodality should be promoted during training programmes (Italy, ECF). Also, a majority of respondents (53%, 5,073 out of 7,532) stated that EU rules on driving skills affecting the emission and energy consumption of vehicles is relevant for the EU objective of climate neutrality by 2050.

Driving rights will be associated to vehicles with the automatic gear transmission used for the driving test. The restriction on the use of manual vehicles will be removed after a certified training with manual gear transmission (before or after the driving test) or a short practical test

Many interviewed stakeholders (DE, FI, SI, BE, NL, SE, FIA, DKU and to some extent ETSC) supported the proposal to remove code 78 for drivers who conducted practical tests in an automatic geared vehicle, upon completing a minimum of hours training taken in a manual geared vehicle. In the targeted survey, representatives from national authorities were divided when assessing the impact on road safety of removing code 78 upon minimum training. In the targeted survey of representatives from national authorities, 6 out of 24 respondents assessed the impact as positive, 6 as negative and 5 did not see this measure producing any impact on road safety. Non-governmental stakeholders were divided on the questions of removing code 78 upon minimum training: while 10 of 30 respondents find that it will have a positive impact, the same number considered that this measure would have no or a small negative impact on road safety.

Respondents to the targeted survey for MS either could not assess the impact on free movement of such measure (10/23) or expected a rather positive impact (7/23). Moreover, impact on costs for drivers and businesses could not clearly be specified.

In the OPC, stakeholders were asked to assess the relevance to the objective of climate neutrality by 2050 of the existing restrictions when the driving test is passed on a vehicle with automatic transmission. 51% of respondents do not perceive the current restrictions to be relevant to achieve climate neutrality.

The rights associated to vehicle categories will be updated and aligned - driving licences of categories A1, A2 and A will allow driving with a trailer (mass to be determined) - driving licence of category B will allow driving alternatively fuelled vehicles of a mass not exceeding 4,25t (equivalence which is optional under article 6(4)(c) will become mandatory including for transport of persons)

In the OPC, 6,223 out of 7,532 respondents (almost 83%) considered that improving the definition of vehicle categories is extremely/very important. A number of policy measures on vehicle categories has been presented during interviews, including (i) increasing the maximum weight of B-category vehicles, from 3.5t to 4.25t, potentially with restrictions and/or limited scope, (ii) allowing users with an A-licence to drive with a trailer, (iii) removing or simplifying the graduated access scheme for A-licences.

DE, BG, FR, FI, FIA supported the first measure (i), whereas BE, NL, SE and the DKU supported the measure only for campervans, electric vehicles, and vehicles with social function. In contrast, the ETSC was against such measure as increasing the weight would increase the risk and more training

would be needed. In the OPC, a large majority of respondents (87%) considered it very important that in the revision of the Directive the maximum mass of vehicles for category B is increased to 4,25t and subject to a specific training. Such findings were confirmed during the workshops, with a wide agreement on increasing the maximum weight. During the Inception Impact Assessment, 2,057 out of 2,213 respondents recommended to increase the maximum mass to 4,25t or more. A large majority of respondents to the OPC (76%, 5,741 out of 7,532) further considered such measure to have a fully positive impact on road safety. More respondents to the targeted survey for national authorities believed that increasing the maximum weight of B-category from 3.5 to 4.25t could have a negative impact on road safety (9/18), but a positive impact on free movement (9/18). Views regarding the costs of these measures vary, but costs for businesses and citizens were thought to decrease by 7-8 national authorities, while costs for administrations may increase according to 6 of them.

On the second point (ii), DE, FI, BG, BE, NL and SI would support allowing users with an A-licence to drive with a trailer, while FR and SE instead did not see the need for this measure. In the targeted survey, representatives from national authorities were divided between no impact of the measure on road safety (4/18) or a small negative impact (4/18). A positive impact on free movement was instead foreseen by more respondents (7/18), whereas no impact was expected on costs for business (7/18) and costs for national authorities (7/18). Costs for drivers were expected to decrease as a consequence of the measure (6/18).

Concerning the removal or simplification of graduated access to A licence (iii), DE, FR, SE and ACEM support the graduated access and would not wish the system being changed. On the other hand, NL, BE and SI indicated that there has been no hard data to confirm the graduate access scheme has a positive effect on road safety. In the targeted survey, non-governmental organisations emphasised that staged access for A-licences should be removed as it has no impact on the costs for businesses, drivers and small impacts on free movement while increasing the cost for national authorities. More representatives from national authorities indicated in the targeted survey that removing the graduated access scheme for A-licences would have a negative impact on road safety (10/18). No impact on free movement and costs for business was foreseen (6/18) (5/18). Costs for drivers were expected to decrease by more respondents (9/18). In the targeted survey, most of the non-governmental organisations found that removing the graduated access scheme for A-licences would have negative impacts for road safety (13/22). Regarding the impacts on free movement, non-governmental organisations were divided: 32% believed it would have positive impacts (7), 9% believed it would have no impact (2) and 23% believed it would have negative impacts onto free movement (5).

The use of RESPER for the purpose of enforcement will be improved to make it more effective during roadside checks. RESPER will allow information exchanges regarding driving disqualifications.

Among MS authorities that responded to the targeted survey, the following already use RESPER for enforcement purposes: HR, FI, SE, whereas almost all countries that answered the survey use RESPER for administrative purposes (AT, BG, HR, DK, FI, LU, NO, RO, SK, SI, and SE). According to survey respondents from national authorities, RESPER is still insufficiently used both for administrative and enforcement purposes.

The standards on physical and mental fitness (Annex III) will be updated: vision, diabetes, dependences and disorders.

In the OPC, stakeholders strongly expressed the need for improving the provisions of the Directive on standards on drivers' physical and mental fitness. About 76% of respondents (5,718 out of 7,532), in fact, stated that improving such standards is extremely/very important. During interviews, Member States (DE, FI, SE, BG) and other stakeholders (DKU, ACEM, FIA, ETSC) have generally agreed with the need to update minimum standards of physical and mental fitness for driving (Annex III) in order to reflect current scientific evidence. This applies to changes in the following domains: visual field defects, diabetes and blood sugar in interstitial fluid measurements, and narcolepsy. During the workshops, NL, FR and DK supported updating Annex III to make more room for vision provisions and requirements and update provisions on diabetes.

Rules on the use of technologies to mitigate medical unfitness (e.g., alcohol lock) will be developed

Introducing rules on the use of technologies to increase inclusiveness and compensate for reduced medical fitness, as in the example of alcohol interlocks has been supported by interviewed stakeholders (FI, FIA, BG, SE, DKU). In the survey, more respondents (9/21) assumed a positive impact on road safety resulting from this measure. A majority of respondents could not assess its impact on free movement (12/21), costs for business (12/21), costs for drivers (14/21) and costs for national authorities (11/21). In the survey, thirteen (57%) of the participating non-governmental organisations believed that allowing the use of technology to increase inclusiveness will have a positive impact on road safety.

Clarification regarding the establishment of normal residence will be established, in particular to cover cases with no and multiple normal residences (first 6 months in a new country, cases where two - or more - MS consider they can be issuing authority, special cases)

The establishment of normal residence can have an impact on the issuance, renewal, replacement and exchange of driving licences. In the OPC, more than 60% of respondents (5,114 out of 7,532), considered necessary to improve the provisions of the Directive concerning issuing, renewing and replacing of driving licences and their exchange when relocating elsewhere in the EU as extremely/very important.

Adopting interpretative guidelines to assess normal residence was assessed positively by respondents in the survey for national authorities, especially for its impact on road safety (12/19) and free movement (11/19). When assessing the impacts of such measure on costs for business, more respondents were divided between decreasing costs (5/19) and no impact at all (5/19). More respondents assessed that the measure would contribute to lower costs for drivers (6/19) and for national authorities (9/19).

In the survey, half of the non-governmental organisations could not assess the impacts of adopting interpretative guidelines to judge normal residence onto road safety (11). The rest mostly believed it would have no impact on road safety (6). During the interviews, SE welcomed exemptions to be made for the establishment of normal residence for citizens that work for embassies, international organisations or NGOs and that live in third countries for long periods.

Mobile driving licences will be mutually recognised based on the ISO18013-5 standard and general principles (involving eIDAS)

The OPC shows that 5,078 out of 7,532 respondents (67%) strongly support the extension of the Directive to introduce mobile driving licences. Most interviewed Member States (DE, BG, BE, NL, SI, and SE) as well as other stakeholders (ETSC, ACEM, and DKU) strongly supported the establishment of the mutual recognition of mobile driving licences. Interviewed Member States also

called for interoperability of mobile driving licences, based on ISO standards. About 79% of respondents to the OPC (5,932 out of 7,532) fully/somewhat agreed that privacy and cyber-security are important factors in the design and operation of mobile driving licences. During the workshop, FR, DG MOVE, and DG CNECT supported the harmonisation of mobile driving licences.

Requiring the mutual recognition of mobile driving licences would have positive impacts on road safety and free movement, according to most respondents to the survey for national authorities (11/18 and14/18 respectively).

Furthermore, about 74% of respondents to the OPC (5,550 out of 7,532) agreed that digital administration of driving licences can make it easier for people to change their place of residence to another Member State.

It will be possible to have a QR code on the physical licence in the areas reserved for microchip

During targeted interviews, requiring a digitally signed barcode on the physical licence instead of a microchip, was strongly supported by FIA, ACEM and the ETSC. DE, SE and FI did not oppose the measure in principle, however expressed concerns. Non-governmental organisations in the survey could not assess the impact of requiring a digitally signed barcode on the physical licence instead of a microchip on road safety (11/22), while 28% believed it would have a small (1) or larger (5) positive impact on road safety. Similarly, most of the non-governmental organisations' respondents could not assess the impact of such measure on free movement (10/22), or on the costs for businesses (11/22).

Rules on administrative validity will be improved and simplified: - the administrative validity of licences for A and B categories will be 15 years only - MS will be able to reduce the administrative validity in the case of temporary stay of third country nationals

In the OPC, about 73% of respondents (5,474 out of 7,532) stated that ensuring a same period of administrative validity for driving licences of category A and B is very/important to consider in the revision of the Directive. During interviews, BG, as well as FIA, were supportive of harmonising driving licences' administrative validity periods, but DE and FI, as well as the DKU, would oppose any proposal to change the status quo of 15 years administrative validity period. DE and SE also do not saw the need for allowing exemptions for temporary workers/residents from third countries in EU Member States to make sure that the administrative validity is equal to the duration of the work/residence permit.

In the survey with national authorities, harmonising administrative validity periods for exemptions was considered to have a positive impact on road safety (8/19) and on free movement (9/19). Almost half of the non-governmental organisations could not assess the impacts of this measure onto the costs for businesses (9/22), on the costs for drivers (10/22) and on the costs for national authorities (9/22).

In the OPC, about 73% of respondents (5,479 out 7,532) believed that the scope of the Directive should be extended to cater for events of crisis and put in place procedures aimed at extending the administrative validity of driving licences during such unexpected events (e.g., COVID-19).

An equivalence will be introduced to allow the holder of a licence of categories D1 and CE to drive vehicles under category DE. Optional equivalences will be mutually recognised between MS implementing them (new EU codes).

Most of the interviewed Member States (DE, FI, BE, BG, NL, FR and SE) expressed support for a measure allowing the equivalence D1+CE=D1E (i). This measure was expected to have no impact on road safety by most countries.

On mutual recognition of optional equivalences, ACEM informed that this is already an option in 14 Member States. Only DE and FR expressed strong support for this measure, on the other hand BG, NL, SE opposed the proposal. In the OPC, about 51% of respondents (3,825 out of 7,532) stated that the removal of the requirement to hold a licence of category C, C1, D or D1 to obtain a licence in category CE, C1E, DE or D1E can have a fully/somewhat positive impact on road safety, whereas 22% of respondents (1,635 out of 7,532) considered this impact rather neutral. During the workshops, FR, SK and NL agreed with the first proposition of recognising optional rights. However, FR and SK disagreed with staging requirements for CD and DE licences.

Rules on training and probation periods will be introduced, including standards on trainers and accompanying persons. Recommendation on lifelong training will also be formulated.

In the OPC, about 66% of respondents agreed that it is very/important to extend the scope of the Directive by introducing rules on training and probation periods (including accompanied driving). The lack of harmonisation in this area was further emphasised in the workshops (CERT, ETSC). Most interviewed stakeholders (FI, FIA, ETSC, ACEM, and DKU) agreed that rules on training need to be extended to cater for e.g., different weather and traffic conditions. In the OPC, 57% of respondents (4,998 out of 7,532) considered important introducing a minimum number of kilometres or hours of training required to pass a driving test in the revision of the Directive. According to a majority of survey respondents from national authorities, providing further rules on training would have a generally positive impact on road safety (17/22).

Also, recommendations on the content of drivers' training programmes at the EU level would be welcomed by most interviewed stakeholders (DE, FIA, ETSC, ACEM, SE). The introduction of recommendations on the content of drivers' training programme was considered to have a positive impact on road safety by a majority of survey respondents from national authorities (15/22).

The introduction of common minimum standards of a mandatory probation period was supported by a majority of respondents to the OPC (57%, 4,297 out of 7,532). In the targeted survey, the impact of establishing a probation period was assessed as generally positive for road safety by a majority of respondents from national authorities (15/24).

Most of the interviewed stakeholders (FI, FIA, ETSC, ACEM, NL, SE, and DKU) would be in favour to establishing common minimum standards for driver trainers, such as guidelines, common curriculum and/or common tests. In the OPC, about 75% of respondents (5,635 out of 7,532) supported having common standards for professional driving instructors and for accompanying persons in the revision of the Directive.

Concerning examiners, about 79% of respondents to the OPC (5,946 out of 7,532) considered improving standards for driving examiners as extremely/very important to achieve the EU road safety targets and remove obstacles to free movement. Interviewed stakeholders (FI, SE, FIA, ETSC, and DKU) supported the updating of training standards for examiners to include hazard perception and issues related to new technologies and professional communication (Annex IV).

On lifelong training, respondents to the OPC were split: 32% of them (2,436 out of 7,532) considered introducing a principle of lifelong training as an important measure in the revision of the Directive, whereas 2,246 (29%) were neutral and 2,134 (28%) did not consider it important. During the

stakeholder workshop, it was emphasised by GDV that life-long training should be encouraged on a voluntary basis. The European Driving School association supports periodic training courses.

Additional training will be required for holders of licences for category B to engage in international and cabotage road transport. Compliance to the standards on physical and mental fitness for category 2 drivers will be required for the renewal of licences of category B for Light Good Vehicle drivers engaged in international and cabotage road transport.

During the interviews, the proposal to introduce an EU Code for driving in Light Good Vehicles (LGVs) was strongly supported by the ETSC, whereas it was opposed by the DKU, in contrast FI. SE did not oppose it but rather underlined the importance that it is related to professional driving and that the administrative burden resulting from it does not exceed the benefits. Other stakeholders (DE and NL) considered such a code to be more relevant in the context of the CPC Directive. In the survey, the impact of such proposal on road safety was assessed as positive by 8 respondents out of 21 from national authorities, whereas 6 respondents did not believe it could produce any impact on road safety. Although 27% of the non-governmental organisations considered that the introduction of An EU code for driving light good vehicles would have no impact on businesses (8), it is worth noting that most non-governmental organisation respondents did not have an opinion (13/30).

In the survey, despite 9 respondents out of 21 from national authorities could not assess such impact, 8 respondents were convinced of the positive impact on road safety of applying the group 2 classification for professional drivers to light good vehicles.

Categories of driving licences will be amended: - category AM will be updated to cover all vehicles of a speed between 25 and 45 km/h, including micro-mobility means

Although in the OPC, a large majority of respondents (4,741 out of 7,532) considered it very/important to integrate such smart mobility means in the category AM in the revision of the Directive, most of the interviewed Member States, as well as ACEM, opposed both the creation of a new category and the inclusion under the category AM of micro-mobility vehicles (NL, BE, FR, FI and DE).

In the targeted survey, 70% of the participating non-governmental organisations expected that policy measured on micro-mobility to have some positive impact (21): small for 40% of the respondent (12) and large for 30% of the respondents (9). While 28% of the non-governmental organisations believed that it would have positive impacts on free movement (6); 32 % of the non-governmental organisations believed it would have no impact on the costs for businesses (7); 41% of the non-governmental organisations considered that it would increase the costs for drivers (9) and 37% of the remaining respondents believed it would increase the costs for national authorities (8).

A majority of national administrations responding to the survey indicated that their countries do not impose specific driving licence requirements related to users of micro mobility.

Categories of driving licences will be amended: - a new category T-EU will be introduced for tractors - the definition of category D1 will be updated by increasing the number of bus passengers from 16 to 22

During interviews, stakeholders were asked to express their support towards (i) introducing a category for agricultural vehicles, (ii) increasing the maximum number of passengers under a D1 licence.

On the first point (i), DE, FI and SE did not see the need for such a measure, rather DE would see it possible that licences for agricultural vehicles are mutually recognised. In general, mutual recognition of licences across the European Union seems to be strongly supported by stakeholders: in the OPC, almost 87% of respondents stated that the recognition of driving licences when travelling in a Member State other than the state of residence is extremely/very important to meet the road safety targets and remove obstacles to free movement in the EU. This is complimented by about 62% of respondents as well who that stated that it is very/important to establish mutual recognition of national licences for agricultural vehicles and forestry vehicles when on the road in the revision of the Directive.

The second proposal (ii) was opposed by DE, FR, SE and the ETSC, while it was supported by FI and BG. The measure was expected to have a negative impact on road safety by more country representatives responding to the survey (8/18), whereas positive impacts on free movement were expected (8/18). In the survey, almost half of the non-governmental organisations could not assess the impacts of this policy measure onto road safety (10/22), onto free movement (13/22), onto the costs for businesses (14/22), onto the costs for drivers (13/22) and onto the costs for national authorities (12/22). The remaining respondents were divided with 19% believing it would have positive impacts on road safety (4), 23% believing it would have no impact on road safety (5) and 14% believing it would have negative impacts onto road safety (3). As regards free movement, most of the remaining respondents considered that it would have positive impacts (4/22).

Driving disqualifications will be mutually recognised

A large majority of respondents to the OPC (68%, 5,146 out of 7,532) stated that it is very/important that the scope of the Directive is expanded to include rules on the mutual recognition of driving disqualification. Most stakeholders supported the mutual recognition of driving disqualifications during the workshop (FEVR, ETSC, CEETAR, FR, HU and NL). However, NL raised some legal concerns, while DE was the only stakeholder to firmly disagree with the mutual recognition.

Overall, many stakeholders were supportive of the mutual recognition of driving disqualification, especially when it comes to offenses related to speeding, drink/drunk driving. This was confirmed in the OPC, where about 6,106 (81%) and 4,966 (66%) out of 7,532 respondents, considered the mutual recognition of driving disqualifications resulting from driving under the influence of alcohol or of drugs and from speeding as very/important for the revision of the Directive respectively. Furthermore, 62% of respondents (4,731 out of 7,532) considered the mutual recognition of driving disqualification for other offenses also very/important in the revision of the Directive. In specific, when asked which offences should be mutually recognised in the EU, 87% of respondents to the OPC (6,586 out of 7,532) chose driving under the influence of alcohol and drugs and 46% (3,470 out of 7,532) selected speeding. For speeding, respondents to the OPC tended to prefer a 30 km/h minimum excess above the speed limit in urban areas triggering the mutual recognition of driving disqualification (47%, 3,570 out of 7,532), whereas in rural areas they were divided between 50 km/h (38%, 2,880 out of 7,532) and 30 km/h (22%, 1,680 out of 7,532) and on motorways between 50 km/h (32%, 2,393 out of 7,532) and 70 km/h (27%, 2,032 out of 7,532). In the targeted interviews, the ETSC, as well as ACEM and the DKU expressed support for the mutual recognition of driving disqualification resulting from speeding, drink/drunk driving. SE, SI and BE were also supportive, despite acknowledging the difficulties in finding an agreement with other Member States and with the actual implementation.

Rules on consequences of penalty points for non-residents will be established. Rules on rehabilitation in case of a change of normal residence will be established

During the targeted interviews, stakeholders were asked to express their views on a series of measures to harmonise the regime for driving disqualification throughout the EU, namely:

Specifying minimal rehabilitation periods or activities for imposed disqualifications.

DE expressed a negative view. SE questioned the need to harmonise rehabilitation periods. SE uses the probation periods for drunk driving to incentive the use of alcohol interlocks and considers that a harmonised approach for probation could jeopardise this incentive. The DKU on the other side expressed support for such harmonisation effort. In the survey, more respondents from national authorities indicated that this measure would have positive impacts on road safety (13/20).

On introducing a harmonised system for penalty points in the Directive, and applicable sanctions:

FI, DE and SE expressed negative views on the harmonisation of systems of penalty points. In contrast, BG and the DKU would support it, despite foreseeing difficulties to find an agreement among Member States and in terms of practical implementation.

During the workshop, the introduction of a harmonised penalty point system at the European level was supported by some stakeholder (FR, ETSC). SE shared some reservation, pointing out the risk of points shopping in other Member States if there is mutual recognition. In the survey, more representatives from national authorities assessed that the measure would have a positive impact on road safety (11/20). The impact on free movement was non-assessable for more than half of the respondents (11/20), while the other half were divided. In the survey, non-governmental organisations considered that introducing a harmonised system for penalty points would have a positive impact on road safety (14/22). Non-governmental organisations were divided on the question of its impact on free movement: 32% considered that it would have a positive impact on free movement (7), 14% considered that it would have no impact (3), 18% considered that it would have a negative impact (4) and 36% could not assess the impact of such measure on free movement (8). 45% of non-governmental organisation respondents could not assess the impact of such measure on the costs for businesses (10) and 41% of the respondents considered that such measure would have no impact on the costs for businesses (9). While 45% of the respondent could not assess the impact of such measure on the costs for drivers (10), 36% of the respondents considered that it will have no impact on the costs for drivers (8). Non-governmental organisations were divided on the impacts of this measure on national authorities costs: 37% of the respondents considered that this measure will increase the costs for national authorities (8), 14% of the respondents considered that it will have no impact on the costs for national authorities (3) and 14% of the respondents considered that it will decrease the costs for national authorities (3).

On harmonising the driver disqualification sanction for speeding and drink/drug-driving:

Most national authorities are convinced that harmonising driver disqualification sanctions for speeding and drink / drug-driving can have a positive impact on road safety. Despite more than half of respondents being not able to assess it (11/20), more respondents found that the measure can have a positive impact on free movement (5/20).

In the survey, non-governmental organisations indicated that harmonising driver disqualification sanctions for speeding and drink/drug-driving would have a positive impact on road safety (17/22). Non-governmental organisations were divided on the impact of such measure on free movement: 37% of the respondents considered that it would have a positive impact on free movement (8), 14% considered that it would have no impact on free movement (3), 14% considered that it would have a negative impact on free movement (3) and 36% could not assess the impact of such measure (8).

Guidelines on medical screening and assessment will be formulated. A programme will be launched to support the training of general practitioners on fitness to drive.

FIA, ETSC, BG and DKU would support the introduction of guidelines/recommendations for standardised medical screening process for B licences. DE, on the other hand, would oppose it. In the survey, a majority of respondents from national authorities (13/21) expected a positive impact on road safety of providing guidelines/recommendations for a standardised medical screening process for B licences. In the survey, 78% the non-governmental organisation respondents considered that providing guidelines/recommendations for a standardised medical screening process for B licences would have a positive impact on road safety (small positive impact: 10/23; large positive impact: 8/23).

The establishment of a platform for the sharing of best practices on medical check procedures adopted in EU Member States was supported by most interviewed stakeholders (DE, FIA, ACEM, SE, DKU, FI, and BG). In the survey, the measure was expected to have positive impacts on road safety by most representatives from national authorities (13/21). In the survey, 69% of non-governmental organisation respondents found that establishing a platform for efficient sharing of best practices on medical checks procedures would have a positive impact on road safety (16).

Furthermore, the establishment of a platform for sharing best practices on medical fitness procedures adopted in EU Member States was also considered to have a positive impact on road safety by most respondents from national authorities (13/21).

Rules on physical and mental screening and assessment will be established. A programme will be launched to support the training of general practitioners on fitness to drive.

In the survey, the proposal to require medical fitness to be screened at driving licence renewal for categories A and B was expected to produce positive impacts on road safety by more respondents (9/21). The impact of the measure on free movement was considered as positive by 8 respondents out of 21. Respondents expected an increase in costs for business and costs for drivers (6/21) (12/21), despite several could not assess the impact of the measure on such costs (9/21) (6/21). Also, costs for national authorities are expected to increase (12/21).

In the survey, 70% of the non-governmental organisations' respondents considered that requiring medical fitness to be screened at driving licence renewal for categories A and B would have a positive impact on road safety (16). Non-governmental organisations were divided on the impact of this measure on the free movement of drivers: while 35% of the respondents believe it will have no impact on the free movement of drivers (8), 21% believe it would increase free movement (5) and 9% believe it would decrease free movement (2). 47% of non-governmental organisations' respondents considered that it would increase the costs for businesses (11), 22% of the respondents considered it would have no impact on the costs of businesses (5). 68% of the respondents considered that requiring medical fitness to be screened at driving licence renewal for categories A and B would increase somewhat (13) or substantively (2) the costs for drivers and 41% considered that it will somewhat (9) increase the costs for national authorities.

Applicants that are EU nationals shall be able to obtain their first driving licence of category B in their country of nationality in the event their state of normal residence does not allow interpreters and the official language of their country of nationality is not available for test in the state of normal residence

Stakeholders were asked to assess the measure to require the mutual recognition of theoretical tests. Such measure would allow trainees to conduct an exam in their own language, e.g., in the Member

State in which they were born, and conduct a practical exam in the Member State where they have normal residence. DE and SE would not support such measure. Accordingly, traffic rules are a national competence.

In the OPC, respondents were not fully convinced of this proposal: 45% of them (3,395 out of 7,532) considered it very/important to be considered, whereas about 28% (2,135 out of 7,532) and 17% (1,265 out of 7,532) were, respectively, either neutral or opposed the proposal.

In the survey, the possibility of mutual recognition of theoretical tests was assessed as having a positive impact on road safety as slightly more respondents from national authorities (7/19) foresaw a positive impact than a negative one (6/19). Most respondents expected a positive impact on free movement (12/19). In the survey, almost half of the non-governmental organisations' respondents considered that the mutual recognition of theoretical tests would have a positive impact on road safety (9), despite 36% of the respondents not being able to assess the impact of such measure (8).

The requirement to hold a licence of category C or D to obtain a licence of category CE or DE is removed

Among Member States, DE, FI and SE would support removing the staging requirement, whereas BG and NL opposed the proposal. In the survey for national authorities, more respondents foresaw negative impacts on road safety resulting from this measure (8/18) but positive impacts on free movement (7/18). The measure was also expected to decrease costs for business (8/18) and for drivers (9/18), whereas no impact was foreseen on costs for national authorities (5/18).

Physical and mental assessment will be mutually recognised

DE rejected such proposal, considering it intrusive of Member States' competences. On the same line, SE opposed the measure claiming that the magnitude of the problem does not justify such a response. BG, as well as the DKU, would instead support the measure.

In the survey, more representatives of national administrations answered that the mutual recognition of medical exams would have a positive impact on road safety (7/19), as well as on free movement (11/19). In the survey, 41% of the non-governmental organisations found that the mutual recognition of medical exams would have a positive impact on road safety (9/22), despite 32% of the respondents not being able to assess the impacts of such measure.

MS will be able to establish an optional equivalence, valid only on its territory, allowing a holder of an AM licence to drive car of which the power is physically limited to [TBC] up to 21 years

During the interviews, we asked stakeholder whether they would support a measure to allow Member States to opt for an optional equivalence for B-licence when a driver holds and AM-licence. DE, BG, SE, ACEM and ETSC would oppose the measure. In the survey, most respondents from national authorities expected a negative impact on road safety resulting from allowing Member States to opt for an optional equivalence for B-licence when a driver has received AM-licence (10/19), whereas more respondents expected positive impacts on free movement (5/19).

Half of the non-governmental organisations surveyed found that allowing Member states to opt for an optional equivalence for B-licence when a driver has received AM-licence would have negative impacts onto road safety (11/22) against 10% of the respondents arguing that it would have a positive impact (2).

Code 70 shall be removed from the licence when the driver has been holding an EU licence for at least 5 years and has not committed serious road traffic offenses. Former holders of a driving licence, obtained after passing tests in the EU shall be able to regain all their driving rights in exchange of a foreign driving licences when they relocate in the EU irrespective of their new country of residence.

Interviewed Member States were asked to state their support to a measure that would remove code 70 at the first or second renewal upon the condition that no severe traffic violations have been committed. BG opposed such proposal, which was instead supported by BE, SI and SE. This measure was believed to have no impact on road safety by more respondents from national administrations in the survey (6/19). More respondents expected a positive impact of the measure on free movement (6/19), as well as decreasing costs for business (6/19) and costs for drivers (6/19) as a consequence of its implementation. No impact was foreseen on costs for national authorities (6/19).

In the survey, almost half of the non-governmental organisations' respondents could not assess the impact of removing Code 70 at the first or second renewal if no severe traffic violations were made onto road safety (10/22), onto free movement (9/22) and onto the costs for businesses (10/22). 32% believed that it would have no impact on road safety (7/22). 41% believed that it would have a positive impact on free movement (9/22). 32% of the respondents believe that this measure would decrease the costs for drivers (7/22). Yet, almost half of the respondents could not assess its impacts on the costs for drivers (10/22). While 41% of the respondents could not assess the impacts of this measure onto the costs for national authorities (9/22), 41% of the respondents believed it would have no impacts on the costs for national authorities (9/22).

MS will be able to establish an optional equivalence, valid only on their territory, allowing a holder of a C licence to drive an empty bus

Among interviewed Member States, DE, FI, SE, BE and NL would support allowing holders of a C licence to drive an empty bus. The measure was instead opposed by BG and FR. In the survey, non-governmental organisations were divided on the impact of this measure on road safety: 32% believed that it would have no impact (7) and 28% of the respondents believed that it would have negative impacts onto road safety (6).

Rules on the exchange of foreign driving licences will be established for Third Countries whose licensing system are of the same level as in the EU in term of road safety

DE and BG expressed support for this measure. A majority of respondents to the OPC stated that it is very/important to extend the scopeof the Directive by introducing rules on exchanging driving licences issues by a non-EU country. Furthermore, about 65% of respondents to the OPC fully/somewhat agreed that common rules on the exchange of driving licences issued by a non-EU country are needed to address the shortage of professional drivers. This measure was perceived positively by more respondents from national authorities in the survey, especially for its impact on road safety (9/19) and on free movement (10/19).

In the survey, half of the non-governmental organisations could not assess the impact of establishing a list of third countries accessing the EU framework based on the safety of the foreign licensing system (11/22). 32% of the non-governmental organisations found that such measure would have a positive impact on road safety (8). More than half of the non-governmental organisations (55%/12) believe that such measure will have a positive impact on free movement.

ANNEX 3: WHO IS AFFECTED AND HOW?

1. PRACTICAL IMPLICATIONS OF THE INITIATIVE

Summary of the preferred policy option implementation

The revision of the Directive on driving licences aims at improving road safety and at facilitating the free movement of EU citizens.

The benefits of the preferred policy option are expected to fall on different stakeholder groups: road users, national issuing authorities, law enforcement authorities, driving schools, transport operators and, to a lesser extent, car manufacturers.

The preferred policy option will increase the assurance that drivers on EU roads have the skills, knowledge, experience and risk awareness, are physically and mentally fit to drive and that their behaviour is not dangerous. Ensuring a high level of safety is important for all the road users. It will also have positive effects on road transport operators, driving schools and law enforcement authorities, since their employees and civil servants will be less exposed to safety risks.

The driving licences will be better adapted to alternative fuel vehicles and thus to the evolution of the fleet towards zero-emission vehicles. This will also indirectly benefit car manufacturers, by facilitating the uptake of the concerned technologies, and driving schools, by relaxing potential constraints on vehicles to be used for training.

The preferred policy option will also remove barriers affecting persons when obtaining or exercising driving rights. The most important effect will result from the introduction of mobile driving licences. It will allow for seamless interactions when exchanging information on driving rights. It will benefit all users, from drivers to law enforcement authorities and businesses (for example car rental companies) and national issuing authorities. In addition, other measures will affect targeted groups of citizens, in particular holders of driving licences transferring to other EU countries, applicants that are not fluent in the language of their host country, or young persons willing to became professional drivers for example.

Regarding European competitiveness, the preferred option is expected to lead to hassle cost savings for road transport operators since the introduction of the EU mobile driving licence is estimated to lead to a reduction in hassle costs for the renewal of the category C and D licences. C and D licences are mainly used by professional drivers and the costs savings are thus expected to benefit transport operators, mainly SMEs in the road transport sector. In addition, the preferred option will include the removal of the requirement to hold a licence of category C or D to obtain a licence of category CE or DE, which is expected to lead to administrative costs savings for professional drivers that will benefit road transport operators. The removal of this requirement would lead to a reduction in the number of theoretical and practical tests required to obtain a CE or DE category licence.

Implications on road users, market actors and public authorities

While the revision of the Directive on driving licences is an initiative benefitting all road users, the costs will be essentially borne by Member States' administrations in charge of implementing it. These costs relate to:

1. Update of the procedures and standards for the issuance of driving licences.
2. Introduction and implementation of the mobile driving licences.

3. Introduction and implementation of procedures for the mutual recognition of driving disqualifications.

The European Commission would also incur some costs related to the development of technical solutions, notably in relation to RESPER, and to the exchange of information on medical fitness between authorities.

Citizens will incur adjustment costs for the measures on screening of fitness to drive for drivers renewing their driving licence, independent of age (i.e. self-assessment) and vision test for applicants. They are also expected to incur administrative costs related to the update of standards on skills and knowledge for the first issuance of a driving licence.

The initiative results in administrative cost savings for the private sector, mainly rental companies and transport operators, notably due to the removal of the staging requirements for category CE and DE licences. It also results in hassle costs savings thanks to the introduction of the mobile driving licence. The initiative will however lead to some additional costs for general practitioners, for following (online) training on physical and mental fitness. Indirectly, as road users, some businesses could benefit from increased road safety.

2. SUMMARY OF COSTS AND BENEFITS

I. Overview of Benefits (total for all provisions) – Preferred Option *(Policy option B)*		
Description	***Amount***	***Comments***
Direct benefits		
Enforcement costs savings for Member States administrations, expressed as present value over 2025-2050, relative to the baseline	EUR 2.8 billion	Enforcement costs savings for Member States administrations are mainly driven by measures related to the mutual recognition of mobile driving licences, the possible introduction of a QR code on the physical licence in the areas reserved for microchips, and improvements and simplification of rules on administrative validity. In terms of present value over 2025-2050, the enforcement costs savings are estimated at EUR 2.8 billion.
Administrative costs savings for Member States administrations, expressed as present value over 2025-2050, relative to the baseline	EUR 2 billion	The introduction of the EU mobile driving licence expected to lead to administrative costs savings for Member States administrations estimated at EUR 2 million, expressed as present value over 2025-2050 relative to the baseline. These costs are related to the time spent to ensure that the physical licences are issued to the right person, and thus the time spent to validate the identity of the person to which a new licence is provided. When procedures are digitised, the time spent on such procedures and the associated costs are overcome.
Administrative costs savings for citizens, expressed as	EUR 2.3 million	Administrative costs savings for citizens due to the introduction of rules to remove

present value over 2025-2050, relative to the baseline		restrictions associated to automatic gear transmission, estimated at EUR 2.3 million expressed as present value over 2025-2050 relative to the baseline.
Adjustment costs savings for citizens, expressed as present value over 2025-2050, relative to the baseline	EUR 4.9 billion	Adjustment costs savings for citizens due to less frequent medical checks for drivers suffering of diabetes (every 10 years instead of 5) and changes in the rules for the consultation of the general practitioners for elderly people (above 70 years old), estimated at EUR 4.9 billion relative to the baseline (expressed as present value over 2025-2050).
Hassle costs savings for citizens, expressed as present value over 2025-2050, relative to the baseline	EUR 1.7 billion	Hassle costs savings for citizens due to the introduction of the EU mobile driving licence, estimated at EUR 1.7 billion relative to the baseline (expressed as present value over 2025-2050).
Administrative costs savings for businesses, expressed as present value over 2025-2050, relative to the baseline	EUR 0.9 billion	The removal of the requirement to hold a licence of category C or D to obtain a licence of category CE or DE is expected to lead to administrative costs savings for professional drivers that benefit road transport operators. The administrative costs savings are estimated at EUR 0.9 billion relative to the baseline, expressed as present value over the 2025-2050 horizon.
Hassle costs savings for businesses, expressed as present value over 2025-2050, relative to the baseline	EUR 0.6 billion	The introduction of the EU mobile driving licences is estimated to lead to a reduction in hassle costs for the renewal of the category C and D licences. The C and D licences are mainly used by professional drivers and the costs savings, estimated at EUR 0.6 billion relative to the baseline (expressed as present value over 2025-2050), are thus expected to benefit transport operators, mainly SMEs in the road transport sector.
Improvement in the functioning of the internal market		Positive impact on the functioning of the internal market is expected due to the removal of unneccesary barriers for applicants and holders of driving licences and facilitating free movement of people, the main measure being an introduction of mobile driving licences. The common ISO/IEC 18013-5 standard will ensure interoperability of the mobile driving licences issued by each EU Member State and their recognition in the EU and abroad. Preferred option will also introduce measures allowing faster access to licences of category CE or DE for professional drivers across the EU which will reduce

		barriers for the access to driver profession. The rules related to the concept of normal residence will also help persons transferring their normal residence to another Member State.
Improvements related to the free movement of people		Preferred option is expected to contribute positively to the freedom of movement, and even if the number of persons facing unnecessary or unjustified procedures is rather low, consequences for an individual can be significant. Clarification of the concept of normal residence should solve the problem of determining the issuing authority just after the transfer of residence. Simplification of rules on administrative validity will put the holders of the EU driving licences on equal footing, regardless in which country they apply for or extent the licence. Mutual recognition of optional equivalences will allow holders of driving licences to enjoy rights granted by an optional equivalence also in other Member States applying the same rules.
Contribution to the fundamental rights and equal treatment of EU citizens		Preferred option will align DL Directive to the latest legislation on the protection of personal data through improvement of the network for exchange of information on driving licences RESPER and establishing the EU digital driving licence (PMc9). The use of the eIDAS features for the EU driving licence and EU Wallet for the storage and exchange of data will ensure a high level of security and privacy of the information handled. Mutual recognition of driving disqualifications will give procedural safeguards to non-resident drivers who commit road safety traffic offences and ensure that their fundamental rights are respected. It will also have a positive impact on the right of non-discrimination, given it will provide flexibility for the first issuance of driving licences in case of restrictions related to languages which will allow applicants to choose where to take the tests.
Indirect benefits		
Reduction in the number of fatalities and serious injuries relative to the baseline (cumulative over 2025-2050)	1,153 lives saved and 11,020 injuries avoided	Indirect benefit to society at large. Significant positive effects on road safety are expected, in particular due to the updated standards on skills and knowledge, the introduction of rules on training and probation period, with a probation period for novice drivers, the mutual recognition of driving disqualifications and the rules on

		medical screening and assessment. The impacts are estimated at 1,153 lives saved and 11,020 serious injuries avoided over the 2025-2050, relative to the baseline.
Reduction in external costs of accidents (fatalities and serious injuries), expressed as present value over 2025-2050, relative to the baseline	EUR 7.1 billion	Indirect benefit to society at large, due to the lives saved and injuries avoided. The reduction in the external costs of accidents is estimated at EUR 7.1 billion, expressed as present value over the 2025-2050 horizon (in 2021 prices) relative to the baseline.
Reduction in the use of plastic (polycarbonate), relative to the baseline	130 tonnes of plastic (polycarbonate) saved annually	Indirect benefit to society at large, from the introduction of digital driving licence by default from 2028 onwards that would result in approximatively 130 tonnes of plastic (polycarbonate) saved annually.
Administrative cost savings related to the 'one in, one out' approach		
Administrative costs savings for citizens, relative to the baseline (annual average)	EUR 0.1 million per year on average	Administrative costs savings for citizens are due to the introduction of rules to remove restrictions associated to automatic gear transmission. The annual average reduction in the number of practical driving tests is estimated at 1,184 relative to the baseline. The administrative costs savings are estimated at EUR 0.1 million on average per year, relative to the baseline.
Administrative costs savings for businesses, relative to the baseline (annual average)	EUR 48.5 million per year on average	Administrative costs savings for road transport operators, mainly SMEs, are due to the removal of the requirement to hold a licence of category C or D to obtain a licence of category CE or DE. The measure would lead to a reduction in the number of theoretical and practical driving tests, estimated at 510,474 on average per year relative to the baseline. The administrative costs savings are estimated at EUR 48.5 million per year on average, relative to the baseline.

II. Overview of costs – Preferred option *(Policy option B)*							
		Citizens/Consumers		**Businesses**		**Administrations**	
		One-off	**Recurrent**	**One-off**	**Recurrent**	**One-off**	**Recurrent**
	Direct adjustment costs, expressed as present value over 2025-2050, relative to the baseline	-	For citizens: EUR 716.2 to 1159.1 million, due to screening of fitness to drive for drivers renewing their driving licence and vision test for applicants.	-	For general practitioners: EUR 57.7 million, for (online) training on physical and mental fitness.	For Member States administrations: EUR 14.3 million, for the development of an IT system for the mobile driving licences and the improvement of RESPER for the purpose of enforcement.	For Member States administrations: EUR 48.9 million, for maintenance of an IT system for the mobile driving licences and the development of (animated) videos for the driver hazard perception test. For the European Commission: EUR 0.7 to 1.1 million, for the establishment of an information platform for authorities to exchange on physical and mental fitness to drive and the development of an (online) training programme for general practitioners.
	Direct enforcement costs, expressed as present value over 2025-2050, relative to the baseline	-	-	-	-	-	For Member States administrations: EUR 26.3 million, for the investigation and notification of driving disqualifications.
Costs related to the 'one in, one out' approach							

Total	Direct adjustment costs, expressed as present value over 2025-2050, relative to the baseline	-	For citizens: EUR 716.2 to 1159.1 million, due to screening of fitness to drive for drivers renewing their driving licence and vision test for applicants.	-	For general practitioners: EUR 57.7 million, for (online) training on physical and mental fitness.		
	Indirect adjustment costs	-	-	-	-		
	Administrative costs (for offsetting), expressed as present value over 2025-2050, relative to the baseline	-	-	-	-		

3. RELEVANT SUSTAINABLE DEVELOPMENT GOALS

III. Overview of relevant Sustainable Development Goals – Preferred Option *(Policy option B)*		
Relevant SDG	**Expected progress towards the Goal**	**Comments**
SDG # 11 *"Make cities and human settlements inclusive, safe, resilient and sustainable"* and in particular to target 11.2 *"By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons"*	EU roads are expected to become safer for all road users by: - improving the skills, knowledge, experience and risk awareness of drivers on EU roads, - ensuring mental and physical fitness of drivers - reducing dangerous behaviour. It is estimated to result in 1,153 lives saved and 11,020 serious injuries avoided over the 2025-2050 horizon, relative to the baseline.	Legislation on road use, including licensing, is a core element of the Safe System Approach in road safety and a core principle of the 2020 UN "Stockholm Declaration on road safety"[204]

[204] https://www.roadsafetysweden.com/contentassets/b37f0951c837443eb9661668d5be439e/stockholm-declaration-english.pdf

ANNEX 4: ANALYTICAL METHODS

1. DESCRIPTION OF THE ANALYTICAL METHODS USED

The main model used for developing the baseline scenario for this initiative is the PRIMES-TREMOVE transport model by E3Modelling, a specific module of the PRIMES models. The model has a successful record of use in the Commission's energy, transport and climate policy assessments. In particular, it has been used for the impact assessments underpinning the "Fit for 55" package[205], the impact assessments accompanying the 2030 Climate Target Plan[206] and the Staff Working Document accompanying the Sustainable and Smart Mobility Strategy[207], the Commission's proposal for a Long Term Strategy[208] as well as for the 2020 and 2030 EU's climate and energy policy framework.

For the assessment of the impacts of the policy options an excel-based tool has been developed by COWI, Ecorys and NTUA in the context of the impact assessment support study[209]. The tool draws on the Standard Cost Model for the assessment of the costs and also includes an assessment of the impacts on road safety. The excel-based tool builds on data from the CARE database, the analysis of stakeholders' feedback and desk research undertaken in the context of the impact assessment support study. The proposed measures which involve the amendment of the Directive are assumed to be implemented from 2025 onwards, so that the assessment has been undertaken for the 2025-2050 period and refers to EU27. Costs and benefits are expressed as present value over the 2022-2050 period, using a 3% discount rate.

PRIMES-TREMOVE model

The PRIMES-TREMOVE transport model projects the evolution of demand for passengers and freight transport, by transport mode, and transport vehicle/technology, following a formulation based on microeconomic foundation of decisions of multiple actors. Operation, investment and emission costs, various policy measures, utility factors and congestion are among the drivers that influence the projections of the model. The projections of activity, equipment (fleet), usage of equipment, energy consumption and emissions (and other externalities) constitute the set of model outputs.

The PRIMES-TREMOVE transport model can therefore provide the quantitative analysis for the transport sector in the EU, candidate and neighbouring countries covering activity, equipment, energy and emissions. The model accounts for each country separately which means that the detailed long-term outlooks are available both for each country and in aggregate forms (e.g. EU level).

In the transport field, PRIMES-TREMOVE is suitable for modelling *soft measures* (e.g. eco-driving, labelling); *economic measures* (e.g. subsidies and taxes on fuels, vehicles, emissions; ETS for transport when linked with PRIMES; pricing of congestion and other externalities such as air pollution, accidents and noise; measures supporting R&D); *regulatory measures* (e.g. CO_2 emission performance standards for new light duty vehicles and heavy duty vehicles; EURO standards on road transport vehicles; technology standards for non-road transport technologies, deployment of Intelligent Transport Systems) and *infrastructure policies for alternative fuels* (e.g. deployment of

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[205] Delivering the European Green Deal | European Commission (europa.eu)
[206] SWD(2020)176 final.
[207] EUR-Lex - 52020SC0331 - EN - EUR-Lex (europa.eu)
[208] Source: 2050 long-term strategy (europa.eu)
[209] The analysis in this section is based on the COWI et al. (2022), Impact assessment support study for the revision of the directive on driving licences, and on the analysis of stakeholders' feedback.

refuelling/recharging infrastructure for electricity, hydrogen, LNG, CNG). Used as a module that contributes to the PRIMES energy system model, PRIMES-TREMOVE can show how policies and trends in the field of transport contribute to economy-wide trends in energy use and emissions. Using data disaggregated per Member State, the model can show differentiated trends across Member States.

The PRIMES-TREMOVE has been developed and is maintained by E3Modelling, based on, but extending features of, the open source TREMOVE model developed by the TREMOVE[210] modelling community. Part of the model (e.g. the utility nested tree) was built following the TREMOVE model.[211] Other parts, like the component on fuel consumption and emissions, follow the COPERT model.

Data inputs

The main data sources for inputs to the PRIMES-TREMOVE model, such as for activity and energy consumption, come from EUROSTAT databases and from the Statistical Pocketbook "EU transport in figures[212]. Excise taxes are derived from DG TAXUD excise duty tables. Other data comes from different sources such as research projects (e.g. TRACCS project) and reports.

In the context of this exercise, the PRIMES-TREMOVE transport model is calibrated to 2005, 2010 and 2015 historical data. Available data on 2020 market shares of different powertrain types have also been taken into account.

2. BASELINE SCENARIO

In order to reflect the fundamental socio-economic, technological and policy developments, the Commission prepares periodically an EU Reference Scenario on energy, transport and GHG emissions. The socio-economic and technological developments used for developing the baseline scenario for this impact assessment build on the latest "EU Reference scenario 2020" (REF2020)[213]. The same assumptions have been used in the policy scenarios underpinning the impact assessments accompanying the "Fit for 55" package[214].

2.1. Main assumptions of the Baseline scenario

The main assumptions related to economic development, international energy prices and technologies are described below.

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[210] Source: https://www.tmleuven.be/en/navigation/TREMOVE

[211] Several model enhancements were made compared to the standard TREMOVE model, as for example: for the number of vintages (allowing representation of the choice of second-hand cars); for the technology categories which include vehicle types using electricity from the grid and fuel cells. The model also incorporates additional fuel types, such as biofuels (when they differ from standard fossil fuel technologies), LPG, LNG, hydrogen and e-fuels. In addition, representation of infrastructure for refuelling and recharging are among the model refinements, influencing fuel choices. A major model enhancement concerns the inclusion of heterogeneity in the distance of stylised trips; the model considers that the trip distances follow a distribution function with different distances and frequencies. The inclusion of heterogeneity was found to be of significant influence in the choice of vehicle-fuels especially for vehicles-fuels with range limitations.

[212] Source: https://ec.europa.eu/transport/facts-fundings/statistics_en

[213] EU Reference Scenario 2020 (europa.eu)

[214] Policy scenarios for delivering the European Green Deal (europa.eu)

2.1.1. Economic assumptions

The modelling work is based on socio-economic assumptions describing the expected evolution of the European society. Long-term projections on population dynamics and economic activity form part of the input to the model and are used to estimate transport activity, particularly relevant for this impact assessment.

Population projections from Eurostat[215] are used to estimate the evolution of the European population, which is expected to change little in total number in the coming decades. The GDP growth projections are from the Ageing Report 2021[216] by the Directorate General for Economic and Financial Affairs, which are based on the same population growth assumptions.

Table 12: Projected population and GDP growth per Member State

	Population			GDP growth	
	2020	2025	2030	2020-'25	2026-'30
EU27	447.7	449.3	449.1	0.9%	1.1%
Austria	8.90	9.03	9.15	0.9%	1.2%
Belgium	11.51	11.66	11.76	0.8%	0.8%
Bulgaria	6.95	6.69	6.45	0.7%	1.3%
Croatia	4.06	3.94	3.83	0.2%	0.6%
Cyprus	0.89	0.93	0.96	0.7%	1.7%
Czechia	10.69	10.79	10.76	1.6%	2.0%
Denmark	5.81	5.88	5.96	2.0%	1.7%
Estonia	1.33	1.32	1.31	2.2%	2.6%
Finland	5.53	5.54	5.52	0.6%	1.2%
France	67.20	68.04	68.75	0.7%	1.0%
Germany	83.14	83.48	83.45	0.8%	0.7%
Greece	10.70	10.51	10.30	0.7%	0.6%
Hungary	9.77	9.70	9.62	1.8%	2.6%
Ireland	4.97	5.27	5.50	2.0%	1.7%
Italy	60.29	60.09	59.94	0.3%	0.3%
Latvia	1.91	1.82	1.71	1.4%	1.9%
Lithuania	2.79	2.71	2.58	1.7%	1.5%
Luxembourg	0.63	0.66	0.69	1.7%	2.0%
Malta	0.51	0.56	0.59	2.7%	4.1%
Netherlands	17.40	17.75	17.97	0.7%	0.7%
Poland	37.94	37.57	37.02	2.1%	2.4%
Portugal	10.29	10.22	10.09	0.8%	0.8%
Romania	19.28	18.51	17.81	2.7%	3.0%
Slovakia	5.46	5.47	5.44	1.1%	1.7%
Slovenia	2.10	2.11	2.11	2.1%	2.4%
Spain	47.32	48.31	48.75	0.9%	1.6%
Sweden	10.32	10.75	11.10	1.4%	2.2%

[215] EUROPOP2019 population projections: Eurostat - Data Explorer (europa.eu)
[216] The 2021 Ageing Report: Underlying assumptions and projection methodologies The 2021 Ageing Report: Underlying Assumptions and Projection Methodologies | European Commission (europa.eu)

Beyond the update of the population and growth assumptions, an update of the projections on the sectoral composition of GDP was also carried out using the GEM-E3 computable general equilibrium model. These projections take into account the potential medium- to long-term impacts of the COVID-19 crisis on the structure of the economy, even though there are inherent uncertainties related to its eventual impacts. Overall, conservative assumptions were made regarding the medium-term impacts of the pandemic on the re-localisation of global value chains, teleworking and teleconferencing and global tourism.

2.1.2. International energy prices assumptions

Alongside socio-economic projections, transport modelling requires projections of international fuel prices. The projections of the POLES-JRC model – elaborated by the Joint Research Centre and derived from the Global Energy and Climate Outlook (GECO[217]) – are used to obtain long-term estimates of the international fuel prices. The table below shows the oil prices assumptions of the baseline and policy options of this impact assessment.

Table 13: Oil price assumptions

in $'15 per boe	2015	2020	2030	2040	2050
Oil	52.3	39.8	80.1	97.4	117.9
in €'15 per boe	2015	2020	2030	2040	2050
Oil	47.2	35.8	72.2	87.8	106.3

Source: Derived from JRC, POLES-JRC model, Global Energy and Climate Outlook (GECO)

2.1.3. Technology assumptions

Modelling scenarios are highly dependent on the assumptions on the development of technologies, both in terms of performance and costs. For the purpose of the impact assessments related to the "Climate Target Plan" and the "Fit for 55" policy package, these assumptions have been updated based on a rigorous literature review carried out by external consultants in collaboration with the JRC[218]. Continuing the approach adopted in the long-term strategy in 2018, the Commission consulted on the technology assumption with stakeholders in 2019. In particular, the technology database of the PRIMES and PRIMES-TREMOVE models (together with GAINS, GLOBIOM, and CAPRI) benefited from a dedicated consultation workshop held on 11th November 2019. EU Member States representatives also had the opportunity to comment on the cost elements during a workshop held on 25th November 2019. The updated technology assumptions are published together with the EU Reference Scenario 2020[219]. The same assumptions have been used in the context of this impact assessment.

2.1.4. Policies in the Baseline scenario

Building on the EU Reference scenario 2020, the baseline scenario for this impact assessment has been designed to include the initiatives of the 'Fit for 55' package[220]. It also assumes the implementation of the General Safety Regulation (Regulation (EU) 2019/2144). The Baseline scenario assumes no further EU level intervention beyond the current DL Directive.

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217 https://ec.europa.eu/jrc/en/geco
218 JRC118275
219 EU Reference Scenario 2020 (europa.eu)
220 Delivering the European Green Deal | European Commission (europa.eu)

2.2. Baseline scenario results

Evolution of the number of fatalities and injuries. In the baseline scenario, the number of fatalities is projected to decrease by 23% by 2030 relative to 2015 and by 30% by 2050 relative to 2015[221]. The number of serious and slight injuries is projected to decrease at lower rate (by 18% between 2015 and 2030 and by 25% for 2015-2050). This is despite the increase in traffic over time. Relative to 2020, that reflects the impact of the COVID-19 pandemic, the number of fatalities and slight injuries is projected to decrease by 3% by 2030 while the number of serious injuries is projected to remain relatively stable. By 2050, the number of fatalities would be 13% lower relative to 2020 while the number of serious injuries would be 10% lower and that of slight injuries 11% lower. In particular, the number of fatalities in which novice drivers driving a car are involved are projected to increase by 3% by 2030 (at around 3,900) and to decrease at around 3,400 by 2050 (10% decrease for 2020-2050). This is because, despite the fact that novice drivers are more prone to accidents, the ageing of the population will lead to a decrease in the share of young drivers in the overall driver's population. In the baseline scenario, the targets of the *EU Road Safety Policy Framework 2021-2030 – Next steps towards "Vision Zero"*, of reducing the number of road deaths by 50% between 2020 and 2030 as well as reducing the number of serious injuries by 50% in the same period, would not be met. In addition, this is still far from the goal of the *Sustainable and Smart Mobility Strategy* of close to zero death toll for all modes of transport in the EU by 2050.

Evolution of the number of theoretical and practical driving tests and costs. In the baseline scenario, the number of theoretical and practical driving tests is projected to increase by 7% by 2030 (from 21.2 million in 2019 to 22.7 million in 2030) and by 12% by 2050 (at around 23.8 million), relative to 2019. The number of theoretical and practical driving tests for category B licence is driven by the projected evolution of the population above 15 years old[222] and the evolution of the vehicle stock over time, while the number of theoretical and practical driving tests for categories A, C and D licences are driven by the projected evolution of the vehicle stock. The projected evolution of the total number of theoretical and practical driving tests, by Member State, in the baseline scenario is provided in Table 14.

Table 14: Projected evolution of the total number of theoretical and practical driving tests, by Member State, in the baseline scenario (in millions)

	2019	2030	2050
Austria	0.34	0.39	0.42
Belgium	0.71	0.87	0.92
Bulgaria	0.27	0.27	0.28
Cyprus	0.05	0.05	0.06
Croatia	0.23	0.24	0.25
Czech Republic	0.51	0.58	0.70
Denmark	0.22	0.25	0.25
Estonia	0.06	0.07	0.07
Finland	0.27	0.29	0.27
France	3.57	4.09	4.28
Germany	3.47	3.32	3.56
Greece	0.36	0.42	0.43
Hungary	0.29	0.33	0.37
Ireland	0.33	0.36	0.38
Italy	1.77	1.96	2.03

[221] Projections refer to injuries in which a passenger vehicle, a light commercial vehicle, a bus or a truck is involved (power two wheelers are not included in the projections).

[222] The 2021 Ageing Report: Economic and Budgetary Projections for the EU Member States (2019-2070) (europa.eu)

	2019	2030	2050
Latvia	0.06	0.05	0.05
Lithuania	0.23	0.21	0.25
Luxembourg	0.03	0.03	0.04
Malta	0.02	0.03	0.03
Netherlands	1.15	1.15	1.19
Poland	1.94	2.06	1.90
Portugal	0.48	0.50	0.48
Romania	1.35	1.43	1.51
Slovenia	0.10	0.09	0.09
Slovakia	0.19	0.20	0.22
Spain	2.48	2.59	2.79
Sweden	0.76	0.90	0.97
EU27	**21.24**	**22.74**	**23.77**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

The average cost for a theoretical test for a category B licence is estimated at EUR 38 (i.e. ranging between EUR 7 for Poland and EUR 110 for Portugal) and the one for the practical driving test at EUR 88, based on information obtained for 17 Member States in the context of the impact assessment support study. For category A licences, the average cost for the theoretical test is estimated at EUR 37 and for the practical test at EUR 101. For category C and D licences, the average cost for a theoretical test is estimated at EUR 42 and EUR 43, respectively, and for the practical test at EUR 134 and EUR 136, based on data for 17 Member States. For the other Member States, the average cost for the 17 Member States has been used. The total costs at EU level associated to the theoretical and practical driving tests are projected to go up from EUR 1.47 billion in 2019 to EUR 1.55 billion in 2030 and EUR 1.64 billion by 2050, driven by the increase in the number of theoretical and practical driving tests (see Table 15).

Table 15: Projected evolution of the total number of theoretical and practical driving tests, by Member State, in the baseline scenario (in millions)

	2019	2030	2050
Austria	14.3	16.5	17.7
Belgium	21.3	25.9	28.0
Bulgaria	17.4	17.3	18.3
Cyprus	3.1	3.5	3.8
Croatia	14.8	15.9	16.2
Czech Republic	27.5	31.7	39.0
Denmark	14.2	15.9	16.1
Estonia	4.0	4.2	4.7
Finland	19.4	20.7	19.4
France	148.7	170.4	177.9
Germany	252.1	243.2	264.9
Greece	18.6	20.5	21.1
Hungary	18.8	20.9	23.8
Ireland	22.6	22.7	24.2
Italy	154.2	176.4	184.4
Latvia	3.9	3.5	3.4
Lithuania	7.3	6.5	8.1
Luxembourg	2.5	3.0	3.4
Malta	1.6	1.8	2.2
Netherlands	90.8	83.8	86.8
Poland	37.7	40.1	37.6
Portugal	61.0	62.5	59.6

	2019	2030	2050
Romania	69.8	73.7	78.0
Slovenia	4.1	3.6	3.6
Slovakia	11.9	12.5	13.6
Spain	387.9	407.8	441.4
Sweden	42.2	48.1	51.8
EU27	**1,471.6**	**1,552.5**	**1,648.9**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

Evolution of the number of active driving licences and exchanged licences. The number of driving licences (A to D categories) is projected to increase by around 5% by 2030 relative to 2019 (from around 250 million in 2019 to 263 million licences in 2030) and to remain relatively stable by 2050 (at around 260 million in 2050). Without further EU level action on the mutual recognition of the mobile driving licences, the physical licences are projected to remain dominant in the EU by 2050. Indeed, while most of the Member States are likely to implement mobile driving licences, they will remain valid only on the territory of the State issuing them. To travel abroad within the EU, drivers will still have to keep their physical driving licences.

Table 16: Projected evolution of the number of active licences, by Member State, in the baseline scenario (in millions)

in million	2019	2030	2050
Austria	5.0	5.4	5.5
Belgium	6.3	6.8	6.9
Bulgaria	4.0	3.8	3.3
Cyprus	0.5	0.6	0.6
Croatia	2.3	2.3	2.0
Czech Republic	5.9	6.2	6.1
Denmark	3.2	3.4	3.5
Estonia	0.7	0.8	0.7
Finland	3.8	3.9	3.7
France	36.3	39.4	40.3
Germany	40.1	42.7	42.5
Greece	6.1	6.2	5.7
Hungary	5.5	5.6	5.4
Ireland	2.8	3.3	3.8
Italy	38.2	39.7	38.4
Latvia	0.9	0.8	0.7
Lithuania	1.5	1.4	1.2
Luxembourg	0.3	0.4	0.5
Malta	0.3	0.3	0.4
Netherlands	11.4	12.0	12.2
Poland	22.0	22.9	21.4
Portugal	6.6	6.8	6.3
Romania	7.7	7.6	6.7
Slovenia	1.2	1.2	1.2
Slovakia	3.6	3.7	3.6
Spain	26.9	28.5	28.8
Sweden	6.7	7.4	8.2
EU27	**249.6**	**263.1**	**259.7**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

The number of EU exchanged licences would increase by 3% by 2030 and 4% by 2050, while the number of third country exchanged licences are projected to go up by 2% by 2030 and 7% by 2050

(see Table 17). Without further EU level intervention, holders of foreign driving licences (including EU citizens) will likely continue to see their driving rights limited. Indeed, the restrictions when moving to another Member State will remain applicable to them.

Table 17: Projected evolution of the total number of exchanges at EU level in the baseline scenario (in millions)

	2019	2030	2050	'19-'30	'19-'50
Exchanges	0.77	0.79	0.81	2%	5%
EU exchanges	0.35	0.36	0.37	3%	4%
Third countries exchanges	0.42	0.43	0.44	2%	7%

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

3. IMPACTS BY POLICY MEASURE ON COSTS

This section explains the inputs used and provides the assessment of the impacts of the policy measures included in the policy options on costs. The synergies between the measures included in the options are already captured in this section.

PMc1: Update of standards on skills and knowledge to be met for the first issuance of a driving licence

Adjustment costs for citizens

PMc1 foresees to extend the range of issues subject to testing, including knowledge of new vehicle features (safe use of Advanced Driving Assistance System/automation) as well as perception of hazardous situations, understanding of risk factors in normal traffic situations (including the presence of new vulnerable road users such as e-scooters) and safety of zero emission vehicles (e.g. chemical and explosion risks in the event of fire affecting an electric vehicle).

The measure would likely result in adjustment costs for applicants for a B-licence, especially concerning the theoretical test. This is because applicants are to be tested on more subjects and this may result in fewer passing the test, with the need to retake the test. Especially the Hazard Perception Test (HPT) that is conducted separately from a theoretical test is likely to result in fewer passing the exam. Belgium, Germany, Finland and the Netherlands have already introduced the HPT and they are assumed to continue to implement it in the baseline scenario.

Flanders introduced the Hazard Perception Test in June 2017. During 2018-2020, about 80% of the candidates passed the Hazard Perception Test (77% in 2017, 81% in 2018 and 80% in 2019). The Netherlands revised the theoretical testing framework in 2019 and improved the Hazard Perception Test element (e.g. by making use of video instead of pictures). There was however no clear impact on the passing rate of theoretical exams. The passing rate for the theoretical exam increased from 41% in 2019 to 43% in 2020, to drop to 38% in 2021.

It is difficult to relate the passing rate of the Hazard Perception Test to the passing rate of the theoretical exam. The question is whether the candidates that fail the Hazard Perception Test also fail other parts of the theoretical exam. If this is the case, the introduction of HPT would not affect passing rates; people that do not pass the HPT would not have passed the theoretical exam in the baseline scenario. The other extreme, in which only candidates that passed other parts of the exam fail the HPT, results in larger impacts. In this situation, it is estimated that the passing rate would drop by 20% based on experience in Flanders. On the other hand, data from the Netherlands suggests that the HPT is mainly failed by candidates that would have also failed the exam if the HPT was not introduced (since there was no clear impact on average passing rates for theoretical exams). Data from Belgium, on the passing rates of theoretical exams, suggests a similar dynamic. The passing

rate for the theoretical B-exam decreased from 40% in 2017 to 39% in 2018 and increased to 44% in 2020 and 40% in 2021.

Other elements of the measure, such as testing on advanced drivers' assistance systems, may also lead to a decrease in the passing rates for the theoretical exams. This is because the test may become more difficult and capture more elements, especially on the theoretical part. The decrease in passing rates translates in an increase in (re-)testing relative to the baseline.

Considering all these effects, it is estimated that PMc1 would thus lead to an increase by 74,174 of the theoretical tests in 2030 and 75,382 in 2050, assuming a 1% drop in passing rates relative to the baseline. The average cost for a theoretical exam is estimated at 38 EUR, based on information obtained for 17 Member States (i.e. ranging between 7 EUR for Poland to 110 for Portugal). For the other Member States, the average cost for a theoretical exam has been used for estimating the costs. The adjustment costs for applicants for a B-licence are estimated at EUR 2.8 million in 2030 and EUR 2.9 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, the adjustment costs for citizens in PMc1 are estimated at EUR 52.5 million relative to the baseline (in 2021 prices). The costs of PMc1 are the same in all policy options.

Adjustment costs for Member States administrations

For the development of the Hazard Perception Test, new testing material would need to be developed. In PMc1 it is assumed that all Member States that do not have an HPT component in their testing framework (i.e. all except Belgium, Germany, Finland and the Netherlands) would need to develop some (animated) videos. The cost for the production of the video is estimated at around EUR 7,000 per minute on average at EU level and the animated video is assumed to require 30 minutes. The animated video is assumed to be produced every 5 years starting from 2025. The adjustment costs for Member States authorities are estimated at EUR 3.5 million in 2030 and in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, the adjustment costs for Member States authorities are estimated at EUR 15.2 million relative to the baseline (in 2021 prices). The costs of PMc1 are the same in all policy options.

Other elements of PMc1, aiming to update the standards on skills and knowledge, are not expected to lead to adjustment costs for Member States authorities. During the stakeholders' consultation, it was acknowledged that theoretical tests are often revised (e.g. questions are removed and others added). Thereby, they are not expected to result in additional costs relative to the baseline.

PMc2: Introduction of rules to remove restrictions associated to automatic gear transmission

Administrative costs savings for citizens

Restrictions related to transmission gear will be adapted to reflect the increased uptake of electric vehicles. Without compromising road safety, these adaptations will make it simpler to remove the restriction applied to driving licences when passing the driving test on a vehicle with an automatic gear transmission (a short practical test, potentially on simulator, or a certified training will be required instead of the full practical test currently required).

Germany has implemented this measure since January 2021 and it is assumed to continue to implement it in the baseline scenario. The assumptions used for assessing the impacts of this measure draw on the impact assessment that supported the decision-making in Germany for implementing the

measure[223]. In the impact assessment it is argued that the measure might have different impacts for driving licence applicants. On the one hand, it would be easier to learn how to drive in a vehicle with an automatic transmission. As such, fewer lessons may be needed and thereby the costs of obtaining a B-licence may decrease. On the other hand, by requiring a minimal number of training hours in a vehicle with automatic gear, the training requirements would be higher relative to the baseline and the training costs may increase. The impact assessment concluded that overall these two effects would balance out.

PMc2 is expected to only affect holders of a Code 78 licence[224] that would like to have this code removed. In the baseline scenario, the number of practical tests for a Code 78 licence is projected to increase to 1.6 million at EU level by 2030 and 8.1 million by 2050, driven by the uptake of zero-emission vehicles with automatic transmission. In Germany, some 450 tests are conducted annually to have Code 78 removed. This represents around 0.9% of the Code 78 tests[225]. In PMc2 the number of practical tests for removing the Code 78 licence would decrease by 0.9% in 2025, 0.1% in 2030 and 0% by 2050 relative to the baseline. The reduction is lower post-2025 because of the increasing share of vehicles with automatic transmission and thus the limited need to be able to drive a vehicle with manual transmission. PMc2 results in a decrease in the number of practical tests at EU level by 1,019 in 2030 and 714 in 2050 relative to the baseline.

The administrative costs savings for citizens are estimated at EUR 0.09 million in 2030 and EUR 0.07 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, they are estimated at EUR 2.3 million relative to the baseline (in 2021 prices). The costs savings for citizens of PMc2 are the same in all policy options.

Impacts on the private sector (driving schools)

There are no costs associated to PMc2 for driving schools. In the baseline scenario, the progressive uptake of zero-emission vehicles imply the uptake of vehicles with automatic transmission by default. Thereby, the demand for Code 78 licences and Code 78 tests is projected to increase (i.e. to 1.6 million tests in 2030 and 8.1 million tests in 2050) in the baseline, since the need to be able to drive a vehicle with manual transmission would decrease.

PMc3: Amendments to the definitions of vehicle categories for cars and vans (maximum mass)

In PMc3, category B licence will include alternatively-fuelled vehicles of a maximum mass not exceeding 4,25t, without a trailer. This measure is expected to have a positive impact on citizens, by allowing them to drive such vehicles with a category B licence. It would also have an indirect positive effect on manufacturers of B category vehicles. PMc3 is not expected to have a significant impact on costs.

PMc4: Improvement of RESPER for the purpose of enforcement

Adjustment costs for Member States administrations

Improvements to RESPER (the network for the exchange of information related to driving licences) will be introduced to further support cooperation between issuing authorities and thereby ensuring a

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223 https://www.bundesrat.de/SharedDocs/drucksachen/2020/0501-0600/579-20.pdf?__blob=publicationFile&v=1

224 EU Code 78 imposes a restriction on the holder of the licence, in the sense that they can only drive a vehicle with automatic transmission.

225 https://www.bundesrat.de/SharedDocs/drucksachen/2020/0501-0600/579-20.pdf?__blob=publicationFile&v=1

better fight against fraud and dangerous behaviour. It will address the practical difficulties related to privacy protection resulting from the Directive (EU) 2018/645, by clarifying the use cases and with a strong focus on fundamental rights. In addition, the needs of law enforcement will be better covered in term of data quality and reactivity as well as with the inclusion of information on driving disqualifications of non-residents[226].

All Member States are already using the RESPER system for the exchange of information. The ex-post evaluation[227] indicated that Member States favour the use of RESPER for enforcement purposes. However, some Member States indicated that the data quality is often low. Both findings were confirmed during a stakeholders' workshop organised on 19 May 2022, during the targeted interviews and the targeted survey organised in the context of the impact assessment support study[228].

Some technical modifications would be needed to ensure that RESPER is able to exchange additional elements, mainly related to driving disqualifications. It should be noted however, that overall, these costs are likely not to be substantial. In the assessment, a conservative assumption has been made in which all Member States are faced with one-off adjustment costs of EUR 50,000 relative to the baseline, bringing the total one-off costs for the EU27 at EUR 1.350 million in 2025.

PMc4 also supports the implementation of other policy measures included in the options. For example, enforcement authorities would benefit from access to the system to check the validity of a digital driving licence (PMc9). The mutual recognition of driving disqualifications (PM4) would also be facilitated by the exchange of information via RESPER.

PMc5: Update of standards on physical and mental fitness to be met for the issuance of driving licences

Adjustment costs savings for citizens

In PMc5 the requirements related to diabetes would be updated taking into account the evolution of medical care for this disease. In particular, the frequency of the physical fitness assessment will be of 10 years instead of 5.

According to an OECD study[229], in 2019 about 32.3 million adults were diagnosed with diabetes in the EU. Around 66% of the population above 15 years old is in possession of a driving licence. The number of adults diagnosed with diabetes that hold a driving licence is estimated at around 21.3 million, or 8.5% of the total number of active driving licences in 2019. Assuming that the share of adults diagnosed with diabetes would remain constant over time in the baseline scenario, the number of driving licences held by people diagnosed with diabetes is projected to increase to 22.7 million by 2030 and slightly decrease to 21.8 million by 2050. In the baseline scenario, in line with the requirements of the Directive, people diagnosed with diabetes need to undertake a physical fitness check every five years. Thus, the number of physical fitness checks is estimated at 4.3 million in 2019, 4.5 million in 2030 and 4.4 million in 2050 in the baseline scenario.

In PMc5, the frequency of the physical fitness assessment is increased to ten years. As a result, the number of physical fitness checks for people suffering from diabetes is estimated to decrease by 2.3 million in 2030 and 2.2 million in 2050 relative to the baseline. Based on data available for 23

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[226] Member States will be then able to decide if and how they apply or not disqualification to the offender.

[227] 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/2022/0017 final.

[228] COWI et al. (2022), *Impact assessment support study for the revision of the directive on driving licences*

[229] https://www.oecd-ilibrary.org/sites/83231356-en/index.html?itemId=/content/component/83231356-en

Member States, the average cost per medical check is estimated at 47 EUR. For Member States for which the cost per medical check is not available (BG, CY, MT, PT) the average cost of 47 EUR per medical check has been assumed.

The adjustment costs savings for citizens is estimated at EUR 136 million in 2030 and EUR 130.3 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, they are estimated at EUR 2.477 million relative to the baseline (in 2021 prices). The costs savings for citizens of PMc5 are the same in all policy options.

The estimated reduction in the number of physical fitness checks and the reduction in costs relative to the baseline, by Member State, is provided in Table 18.

Table 18: Reduction in the number of physical fitness checks and costs (in million EUR) in PMc5 relative to the baseline

	Reduction in the number of physical fitness checks		Reduction in costs for physical fitness checks (in million EUR)	
	2030	2050	2030	2050
Austria	46,410	46,991	1.6	1.6
Belgium	60,116	60,753	4.4	4.4
Bulgaria	32,124	26,699	1.5	1.3
Cyprus	4,829	5,229	0.2	0.2
Croatia	19,308	16,216	0.8	0.7
Czech Republic	53,766	50,316	1.1	1.0
Denmark	29,115	29,483	1.6	1.6
Estonia	6,567	6,183	0.3	0.2
Finland	27,657	24,788	3.7	3.3
France	343,554	350,908	12.4	12.6
Germany	367,529	348,537	49.6	47.1
Greece	53,642	46,846	1.1	0.9
Hungary	48,296	44,920	0.4	0.4
Ireland	25,275	28,179	1.3	1.4
Italy	344,956	329,163	20.7	19.7
Latvia	6,937	5,523	0.3	0.2
Lithuania	9,965	6,940	0.2	0.2
Luxembourg	3,544	3,987	0.2	0.2
Malta	2,998	3,454	0.1	0.2
Netherlands	109,123	110,544	4.5	4.6
Poland	195,993	172,871	8.3	7.3
Portugal	59,414	54,058	2.8	2.6
Romania	65,077	51,942	1.8	1.4
Slovenia	10,791	10,255	0.6	0.6
Slovakia	32,498	30,342	0.5	0.5
Spain	250,010	248,049	15.0	14.9
Sweden	64,169	70,708	0.9	1.0
EU27	**2,273,662**	**2,183,889**	**136.0**	**130.3**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

PMc6: New rules on the use of technologies to offset medical unfitness

In PMc6, when a person does not meet the standards on physical and mental fitness, a driving licence may be issued to that person with the obligation to use a technology that mitigates the unfitness to drive (e.g. alcohol interlock).

In the baseline, drivers that are diagnosed with 'alcohol-dependence' are not entitled to drive a vehicle (Annex III.14). A paper by Rehm at al. (2015)[230] estimated that some 3% of EU citizens in the age group 18 to 64 suffer from alcohol dependence. With new intelligent devices such as alcohol interlock, a driver should repeatedly proof that he/she is not under the influence of alcohol when driving a vehicle. This could facilitate people with alcohol dependence to drive a vehicle equipped with an alcohol interlock, which could have a positive effect on the free movement of people diagnosed with alcohol-dependence. However, they will have to bear the costs of installing the device in the vehicle. In the Netherlands, the full costs (installation, administrative costs, costs for monitoring and support) for an alcohol interlock are estimated at EUR 200 per month[231] or EUR 2,400 per year driver. There is no evidence on the number of people that suffer from alcohol dependence that would be willing to install an alcohol interlock. For this reason, the costs related to this measure are not quantified. PMc6 is included in all policy options and the potential costs would be the same, not affecting the ranking of the options.

PMc7: Establishment of a knowledge management Platform for authorities regarding physical and mental fitness to drive

Adjustment costs for the European Commission

In PMc7 an expert group will be established and annual meetings will be organised by the European Commission, to allow authorities to share information and best practices in relation physical and mental fitness to drive (e.g. screening, assessment). The cost of organising one meeting per year, including the reimbursement of participants, is estimated at EUR 30,000 per year from 2025 onwards. Expressed as present value over the 2025-2050 period, the adjustment costs for the European Commission are estimated at EUR 0.6 million relative to the baseline (in 2021 prices). The costs of PMc7 are the same in all policy options.

PMc8: Clarification of the concept of normal residence

In PMc8 the concept of normal residence will be developed to specify how the normal residence should be determined during the 6 first months of establishment in a new country, including certain special cases where two or more Member States consider they can be issuing authority.

The number of EU exchanges of driving licences is estimated at some 0.3 million cases in 2019 and projected at around 0.2 million by 2030 and 2050 in the baseline scenario. The number of cases where normal residence cannot be established is fairly small at EU level. However, although the number of cases is low, the consequences for individuals can be significant. For example, the right to drive a vehicle (e.g. issuance of a licence) might not be granted if no country recognises the normal residence of an individual, which significantly impairs the free movement of these road users. This was also highlighted during the stakeholders' consultation.

The clarification of the concept of normal residence is expected to have a positive impacts costs related to handling of complaints from citizens and in extreme cases, court rulings. They are also expected to result in a reduction of the hassle costs for citizens. However, it was not possible to quantify the reduction in costs. PMc8 is included in all policy options and the potential cost savings would be the same, not affecting the ranking of the options.

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230 https://pubmed.ncbi.nlm.nih.gov/25342593/
231 https://etsc.eu/wp-content/uploads/2016_12_alcohol_interlock_guidelines_final.pdf

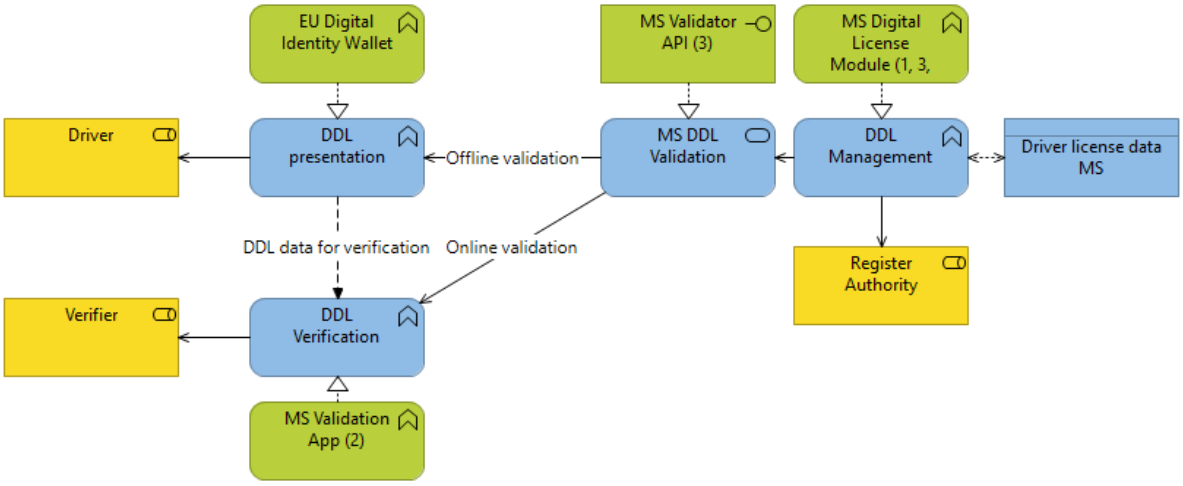
PMc9: Introduction of the EU mobile driving licence

In PMc9 an EU digital driving licence is assumed to be introduced, based on ISO18013-5 and on eIDAS features. Mobile driving licences would be recognised from 2026 and would be issued by default from 2028.

Adjustment costs for Member States administrations

The introduction of the EU mobile driving licence (PMc9) requires the development of an IT system for the mobile driving licences. The estimation of the costs is based on the following architecture, which adheres to the ISO standard and assumes the use of the EU Identity Wallet.

Figure 4: Architecture for establishing a system for mobile driving licences



Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

The cost elements of the system are explained below:

1. **Ensure and maintain integration with existing driving licence issuance system**. This element provides the estimated costs of integrating the existing driving licence issuing system with the module that generate the digital driving licence (see point 4 below).
2. **Build/implement and maintain validator app.** This element provides the estimated costs of developing and maintaining a validator app that can be used by authorities to validate the digital driving licence presented to them as a QR code.
3. **Build and maintain API for licence registry.** This element provides the estimated costs of implementing an API (Application Programming Interface) in the existing licence registries that can be used by the validator app to query additional details or obtain up-to-date information about the status of the licence presented.
4. **Build and maintain the generator for digital driving licence.** This element provides the estimated costs of implementing and maintaining the module that can generate the digital secure document that will be held in the EU Digital Identity Wallet. This include generating the secure QR code.
5. **Build DDL secure document (based on the EU Wallet).** This element provides the cost of establishing the secure document data structure based on the EU Digital Identity Wallet and maintaining this.

In the assessment of costs, the following assumptions have been made:

1. The European Digital Identity Wallet is available (i.e. part of the baseline) so that Member States do not need to implement the app that holds the digital licence.
2. The annual maintenance costs are assumed to be 15% of the investments costs.

The number of hours per element, required for building the system for Member States that do not have such system in place is estimated as follows:

1. **Ensure and maintain integration with existing driving licence issuance system**
   Investment costs (one-off in 2025): 4,500 hours
   Maintenance costs (annual recurring costs from 2026): 675 hours
2. **Build/implement and maintain validator app**
   Investment costs (one-off in 2025): 3,500 hours
   Maintenance costs (annual recurring costs from 2026): 525 hours
3. **Build and maintain API for licence registry**
   Investment costs (one-off in 2025): 4,500 hours
   Maintenance costs (annual recurring costs from 2026): 675 hours
4. **Build and maintain generator for digital driving licence**
5. Investment costs (one-off in 2025): 3,500 hours
   Maintenance costs (annual recurring costs from 2026): 525 hours
6. **Build DDL secure document (based on EU Wallet)**
7. Investment costs (one-off in 2025): 3,000 hours
   Maintenance costs (annual recurring costs from 2026): 450
8. **Contingency costs (buffer)**
9. Investment costs (one-off in 2025): 3,500 hours
   Maintenance costs (annual recurring costs from 2026): 525 hours

Thereby, for Member States that do not have any system in place the total number of hours required for implementing the system in 2025 is estimated at 22,500 hours, while 3,375 hours would be required annually from 2026 onwards for maintenance. Differences in infrastructure costs driven by the need to support more users are expected to be negligible. The evidence for the implementation costs is based on the experience of Denmark and Norway. Both these countries include the implementation of a wallet, which will be built within the EU Digital Identity Wallet.

For Member States that already have a system in place or indicated plans to implement a system in the coming years (AT, BE, DE, DK, EL, ES, FI, IT, IE, NL, PL), reflected in the baseline, the additional number of hours for the implementation is estimated at 11,000. This assumes that some activities would still be required (for example to ensure compliance with ISO18013-5 and connection to the EU Wallet), but these costs are expected to be lower relative to MS with no system in place. The number of hours required for maintenance would be however the same, estimated at 3,375 hours per year.

To estimate the costs, the tariffs per hour from the Eurostat Structure of earnings survey, Labour Force Survey data for Non-Wage Labour Costs (i.e. ISCO 2 – professionals) have been used.

The IT system would involve one-off costs of EUR 12.9 million in 2025 plus annual maintenance costs estimated at EUR 1.9 million from 2026 onwards, relative to the baseline. Expressed as present value over the 2025-2050 period, the adjustment costs for the Member States authorities are estimated at EUR 46.7 million relative to the baseline (in 2021 prices), of which EUR 12.9 million one-off costs in 2025.

The estimated one-off and recurrent maintenance costs by Member State are provided in Table 19.

Table 19: Estimated one-off and recurrent maintenance costs (in EUR) by Member State for implementing the IT system for mobile driving licences in PMc9, relative to the baseline

	One-off costs in 2025 (EUR)	Recurrent costs from 2026 (EUR)
Austria	490,574	73,586
Belgium	582,136	87,320
Bulgaria	173,967	26,095
Cyprus	589,338	88,401
Croatia	317,249	47,587
Czech Republic	420,512	63,077
Denmark	569,391	85,409
Estonia	403,933	60,590
Finland	467,516	70,127
France	1,030,330	154,550
Germany	540,619	81,093
Greece	238,736	35,810
Hungary	307,649	46,147
Ireland	543,562	81,534
Italy	477,643	71,647
Latvia	324,963	48,744
Lithuania	287,302	43,095
Luxembourg	1,088,898	163,335
Malta	470,699	70,605
Netherlands	490,449	73,567
Poland	161,627	24,244
Portugal	472,417	70,863
Romania	321,794	48,269
Slovenia	454,282	68,142
Slovakia	346,205	51,931
Spain	336,715	50,507
Sweden	1,019,310	152,897
EU27	**12,927,816**	**1,939,172**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

Enforcement costs savings for Member States administrations

The introduction of the EU mobile driving licences (PMc9) is expected to lead to costs savings with the production of driving licences as the physical licence card is no longer the default option for the issuance of licences.

Currently, the Directive requires a physical driving licence for mutual recognition within the EU. Since the administrative validity of a licence is usually between 10 to 15 years, in the baseline scenario it is projected that all road users would still have a physical licence card, as they are expected to cross the border at least once in 10 to 15 years.

The evidence for the production costs of driving licences draws on data for BE, DK and NL. The production cost per driving licence is estimated at EUR 5.8 in BE, EUR 9.3 in DK and EUR 9.7 in NL. Expressed as share of the licence cost (the fee that the driver needs to pay to the issuing authority), this is estimated at 29% for BE, 21% for DK and 24% for NL. On average, the production costs in these countries accounts for 25% of the total costs.

In PMc9 it is assumed that the cost of renewing, issuing and exchanging a licence is reduced by 25% relative to the baseline. However, there would likely still be licence holders that would like to have a physical licence, for example because they are digitally illiterate. Based on data from Eurostat[232], about 20% of people in the EU do not have the required digital skills. Thereby, it is assumed that about one-fifth of licence holders would still require a physical driving licence in PMc9. In addition, drivers sometimes also use their licence in a Third Country that does not recognise a digital driving licence. The assessment is focused on the share of drivers that might use their licence in Africa, Asia or South America. For other regions, it has been assumed that they will adopt a driving licence system that would recognise the EU mobile driving licence. The share of trips to Africa, Asia or South America is estimated at 2.8% of all trips of EU citizens. These licence holders are assumed to still require a physical licence to be able to drive in one of the above mentioned regions. Both the digital literacy levels and the share of trips to Africa, Asia or South America are differentiated by Member State in the estimation of the costs savings.

Thus, the introduction of the EU mobile driving licences (PMc9) is expected to lead to enforcement costs savings for Member States administrations, for the production of driving licences, estimated at EUR 129 million in 2030 and EUR 145.5 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, the costs savings are estimated at EUR 2,312 million relative to the baseline (in 2021 prices).

The estimated enforcement costs savings for Member States administrations, by Member State, are provided in Table 20.

Table 20: Enforcement costs savings for Member States administrations in PMc9, relative to the baseline (in million)

	2030	2050
Austria	3.4	3.8
Belgium	1.3	1.5
Bulgaria	0.4	0.5
Cyprus	0.3	0.3
Croatia	0.6	0.7
Czech Republic	0.4	0.5
Denmark	2.1	2.2
Estonia	0.5	0.6
Finland	2.3	2.4
France	12.2	13.0
Germany	19.7	23.8
Greece	8.0	9.2
Hungary	0.3	0.4
Ireland	3.5	4.0
Italy	13.6	14.6
Latvia	0.2	0.2
Lithuania	0.4	0.5
Luxembourg	0.1	0.2
Malta	0.3	0.4
Netherlands	3.8	4.0
Poland	28.6	32.5
Portugal	1.7	1.9
Romania	1.4	1.8
Slovenia	0.3	0.3

[232] ISOC_SK_DSKL_I21

	2030	2050
Slovakia	0.7	0.8
Spain	20.7	23.0
Sweden	2.2	2.6
EU27	**129.0**	**145.5**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

Administrative costs savings for Member States administrations

The introduction of the EU driving licence (PMc9) is also expected to lead to administrative costs savings for Member States administrations. These costs are related to the time spent to ensure that the physical licences are issued to the right person, and thus the time spent to validate the identity of the person to which a new licence is provided. When procedures are digitised, the time spent on such procedures and the associated costs are overcome.

A study by the World Bank[233] on the Estonian e-Government system conservatively estimated that each request could save some 15 minutes compared to the case where the system was not in place. Drawing on the World Bank paper it is conservatively assumed that 15 minutes are saved for all procedures related to the application or renewal of a driving licence. To estimate the cost savings, the tariffs per hour from the Eurostat Structure of earnings survey, Labour Force Survey data for Non-Wage Labour Costs (ISCO 5) have been used.

The administrative costs savings for Member States administrations are thus estimated at EUR 90.8 million in 2030 and EUR 133.2 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 horizon (in 2021 prices), the total administrative costs savings for the Member States administrations are estimated at EUR 1,969.3 million in PMc9 in all policy options.

Hassle costs savings for road transport operators

PMc9 is estimated to lead to a reduction in hassle costs for the renewal of the category C and D licences. Drawing on the World Bank study[234], it has been assumed that each renewal request saved 15 minutes on average compared to the case where the system was not in place. The C and D licences are mainly used by professional drivers and the costs savings are thus expected to benefit transport operators, mainly SMEs in the road transport sector (i.e. 99% of the road transport operators)[235]. The hassle costs savings are derived by using the average labour costs by Member State[236], and are estimated at EUR 32.8 million in 2030 and EUR 38.7 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 horizon (in 2021 prices), total hassle costs savings for road transport operators are estimated at EUR 587 million in PMc9.

Hassle costs savings for citizens

PMc9 is estimated to lead to a reduction in hassle costs for the renewal of the category A and B licences. Drawing on the Worldbank study[237], it has been assumed that each renewal request saved 15 minutes on average compared to the case where the system was not in place. The hassle costs savings for citizens are estimated at EUR 72.7 million in 2030 and EUR 116 million in 2050 relative

[233] https://thedocs.worldbank.org/en/doc/165711456838073531-0050022016/original/WDR16BPEstonianeGovecosystemVassil.pdf
[234] https://thedocs.worldbank.org/en/doc/165711456838073531-0050022016/original/WDR16BPEstonianeGovecosystemVassil.pdf
[235] https://eur-lex.europa.eu/resource.html?uri=cellar:9d5c61bf-4629-11e7-aea8-01aa75ed71a1.0001.02/DOC_1&format=PDF
[236] Eurostat Structure of earnings survey, Labour Force Survey data for Non-Wage Labour Costs
[237] https://thedocs.worldbank.org/en/doc/165711456838073531-0050022016/original/WDR16BPEstonianeGovecosystemVassil.pdf

to the baseline. Expressed as present value over the 2025-2050 horizon (in 2021 prices), total hassle costs savings for citizens are estimated at EUR 1,697.2 million in PMc9.

The costs and costs savings of PMc9 are the same in all policy options.

PMc10: Introduction of a possible QR code on the physical licence in the areas reserved for microchip

Enforcement costs savings for Member States administrations

In PMc10 it would be possible to print a QR code in the space reserved on physical driving licences for microchips. It would provide access to additional information, not displayed on the physical driving licence.

PMc10 would lead to a reduction in the production cost of licences. The difference in costs between a licence with a microchip and a licence with a digitally signed bar code is estimated to be EUR 0.50[238]. In both cases the same information would be stored, but it would either be stored on a digitally signed QR code or on a microchip. In the baseline scenario, only Netherlands makes use of the microchip and it is thus the only country affected by the measure.

The enforcement costs savings due to the introduction of a QR code on the physical licence in the areas reserved for microchip (PMc10) are estimated to be limited (EUR 0.03 million in 2030 and 0.04 million in 2050) relative to the baseline. This is because only the Netherlands makes use of microchips and also because most driving licences would become digital in all policy options, as an effect of PMc9. Expressed as present value over the 2025-2050 horizon (in 2021 prices), the enforcement costs savings for Member States administrations are estimated at EUR 0.6 million in PMc10 in all policy options.

PMc11: Improvement and simplification of rules on administrative validity

Enforcement costs savings for Member States administrations

In PMc11, the 15 years long administrative validity of driving licences for A and B categories will be made mandatory and exclusive.

The Directive currently requires an administrative validity period of 10 years, but allows Member States to also issue licence for 15 years. For Member States that are already issuing licences for 15 years by default (AT, CY, CZ, DE, FI, FR, EL, LU, PL, PT, SK and DK) the measure would have no impact.

For all other Member States, the number of licences that would have to be renewed is estimated to decrease by 1.8 million in 2030 and 3.7 million in 2050. PMc11 is thus estimated to lead to enforcement costs savings of EUR 16.9 million in 2030 and EUR 35.7 million in 2050 relative to the baseline, due to the lower number of licences to be renewed. Expressed as present value over the 2025-2050 horizon (in 2021 prices), the enforcement costs savings for Member States administrations are estimated at EUR 518.3 million in PMc11 in all policy options.

The estimated enforcement costs savings for Member States administrations, by Member State, are provided in Table 21.

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[238] https://internetpkg.com/average-cost-of-manufacturing-a-sim-card/

Table 21: Enforcement costs savings for Member States administrations in PMc11, relative to the baseline (in million)

	2030	2050
Austria	-	-
Belgium	0.8	1.7
Bulgaria	0.3	0.6
Cyprus	-	-
Croatia	0.3	0.5
Czech Republic	-	-
Denmark	-	-
Estonia	0.1	0.2
Finland	-	-
France	-	-
Germany	-	-
Greece	-	-
Hungary	0.3	0.6
Ireland	0.6	1.6
Italy	6.5	13.5
Latvia	0.1	0.2
Lithuania	0.1	0.1
Luxembourg	-	-
Malta	0.1	0.4
Netherlands	2.3	5.1
Poland	-	-
Portugal	-	-
Romania	0.9	1.6
Slovenia	0.1	0.2
Slovakia	-	-
Spain	3.3	7.2
Sweden	0.9	2.2
EU27	**16.9**	**35.7**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

PMc12: Mutual recognition of optional equivalences – New equivalence applicable to small bus combined with a trailer

Administrative costs savings for road transport operators

In PMc12 the optional equivalence would be mutually recognised. For that purpose, an EU code would be introduced for each of the optional equivalence of the Directive. A licence granted for categories D1 and CE shall be valid to drive vehicles in category D1E.

In the baseline scenario, a new driving test is required to allow a driver with a D1 licence to obtain a D1E licence. In PMc12, if a drivers already has a D1 and a CE licence, the drivers does not have to pass another exam. The C and D licences are mainly used by professional drivers and the costs savings are thus expected to benefit transport operators, mainly SMEs in the road transport sector. However, the number of D1 licence holders is negligible at the EU level (e.g. in Germany, D1 category licences represent only 0.002% of all licences) and the share of holders of a D1 and a CE licence is even lower. Therefore, the administrative costs savings due to the measure would not expected to be significant and are not estimated. The measure would however benefit some road transport operators.

PM1: Rules on training and probation periods - Recommendation on lifelong training

PM1 foresees rules on accompanied driving for drivers who are between 17 and 18 years old after passing the driving test will be introduced for categories B and C. It will include a specific EU code and standards applicable to accompaniers. It will require to reduce for this specific case the minimum age from 18 to 17 years old to be professionally qualified (Directive (EU) 2022/2561). A probation period of a minimum of 2 years will be established for novice drivers. It will be subject to strict rules related to driving under influence (zero tolerance) and potentially additional rules and/or restrictions defined by each MS. A recommendation will be adopted for lifelong training, with the objective to maintain drivers' skills and knowledge on advanced technologies. PM1 is not expected to have a significant impact on costs.

PM2: Amendments to the definition of the mopeds' category to include certain micro mobility means

In PM2 the category AM will include all vehicles with a speed between a maximum speed of 25 and 45 km/h, including micro-mobility means. It will not cover vehicles with a maximum speed below 25 km/h. PM2 is not expected to have a significant impact on costs.

PM3: Introduction of a new category for tractors - amendment to the definition of the small bus category

In PM3 the mutual recognition of national licences for tractors will be introduced. In addition, the number of maximum passengers for vehicles of category D1 will be increased from 16 to 22.

The introduction of tractor licences has two counteracting effects. On the one hand, the mutual recognition of licences for agricultural vehicles is expected to facilitate the work of seasonal workers and farmers in the border areas. On the other hand, the introduction of the T-EU licence would imply that applicants would need to undergo mandatory training and testing, which may not be currently required by Member States. Hence, this might increase the costs of obtaining a T-licence relative to the baseline. It was not possible to estimate the costs and benefits associated to PM3 but their size is expected to be small.

The revised definition for the number of passengers to be carried under a D1 licence is expected to have a positive impact on road transport operators, as they will be able to carry more passengers. The share of D1 licences is however low (e.g. only 0.002% in Germany) and the impact on costs savings is thus expected to be limited. However, the measure may particularly benefit SMEs that provide services in remote areas.

PM4: Mutual recognition of driving disqualifications

Enforcement costs for Member States administrations

In PM4 driving disqualifications resulting from specific offenses (speed driving and driving under the influence of alcohol) would be mutually recognised. PM4 would lead to enforcement costs for Member States administrations relative to the baseline, to ensure that driving disqualifications can be imposed on foreign drivers (e.g. drivers that have a licence which was not issued by the Member State in which the offence was committed). The associated costs are related to the additional time spent on investigations and the costs associated to the notification of the foreign offender.

In order to calculate the costs associated to PM4, first an estimation of the increase in driving disqualifications for (severe) speeding offences and offences associated to driving under the influence of alcohol relative to the baseline is needed.

The total number of offences committed by drivers in foreign registered vehicles is aligned with those used in the impact assessment supporting the revision of the CBE Directive as there should be no difference between the numbers of detected speeding and drink driving offences as regards whether they are detected for the purposes of the CBE Directive (i.e. to issue financial penalties) or to pursue the cases and issue driving disqualification. In the case of the impact assessment supporting the revision of the CBE Directive however, the relevant number of offences are the ones that are connected to remote detection. For the purpose of this impact assessment, all the offences which are detected are relevant, regardless of the method of detection, as long as they reach a level of seriousness that leads to a driving disqualification under the law of the Member State that detected he offence.

Speeding offences. The number of speeding offences is available for 20 Member States. For the remaining Member States the number of speeding offences has been extrapolated drawing on the number of speed cameras in each Member State. The number of offences committed abroad is projected to decrease by 2040 (from 91.7 million in 2019 to 86.9 million in 2040) due to the gradual introduction of new safety features in the vehicle fleet, due to the General Safety Regulation[239]. However, as the effect of the introduction of new safety features in the vehicle fleet is expected to peter out by 2040, the number of detected offences is projected to increase again post-2040 (to 92.2 million by 2050). Around 15% of all traffic offences are estimated to be committed by drivers in foreign registered vehicles[240]. In addition, drawing on data for Belgium, the share of severe speeding offences that might result in a driving disqualification has been estimated at 0.9%. The number of driving disqualifications for severe speeding offences is thus estimated at 117,643 in 2030 and 123,639 in 2050 relative to the baseline.

Driving under the influence of alcohol (DUI) offences. The number of DUI offences is available for 15 Member States. In order to estimate the DUI offences for the remaining MS, the historical information on the percentage of drivers that were tested positively during checks has been used[241]. The number of DUI offences is estimated at 1.2 million in 2019 and it is projected to increase to 1.5 million by 2030 and 2.4 million by 2050, drawing on the development of enforcement intensity over the period 2010-2019[242]. Findings from the DRUID project were used to estimate the share of offences in which the tested blood alcohol concentration (BAC) was higher than 0.8 g/l[243]. On the EU level, some 26% of all alcohol offences were estimated to be severe, risking losing the licence. In addition, as for the speed offences it has been assumed that around 15% of all traffic offences are committed by drivers in foreign registered vehicles[244]. The number of driving disqualifications for driving under the influence of alcohol is thus estimated at 64,871 in 2030 and 101,361 in 2050 relative to the baseline.

The total number of driving disqualifications for (severe) speeding offences and for driving under the influence of alcohol is estimated at 182,514 in 2030 and 225,000 in 2050 relative to the baseline.

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239 Regulation (EU) 2019/2144, OJ L 325, 16.12.2019, p. 1.

240 Ecorys et al. (2022), *Impact Assessment support study for the revision of Directive (EU) 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences*

241 Ecorys, Instytut Transportu Samochodowego (ITS) (2022): Prevention of driving under the influence of alcohol and drugs - Publications Office of the EU (europa.eu)

242 ibid

243 European Monitoring Centre for Drugs and Drug Addiction (2012): Driving Under the Influence of Drugs, Alcohol and Medicines in Europe – findings from the DRUID project (TDXA12006ENN_402402.pdf (europa.eu))

244 Ecorys et al. (2022), *Impact Assessment support study for the revision of Directive (EU) 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences*

Investigation costs. Based on stakeholders' consultation in the context of the impact assessment for the revision of the CBE Directive, the investigation time per foreign registered offence is currently around 15 minutes. The time spent on investigation depends to a large extent on whether the process is automated or not. Member States that adopt an automated system, and adopt an owner/holder liability regime, generally have an investigation time between 1 and 3 minutes. In the baseline scenario, a decrease in the investigation time of 5% per year has been assumed. The investigation time is thereby estimated at 15 minutes in 2019, 8.5 minutes in 2030, 5.1 minutes in 2040 and 3.1 minutes in 2050[245].

Mailing costs for successfully investigated offences. The postal charges for sending regular mail within EU are estimated to be between 1 and 2 EUR, and the postal charges for registered mail are estimated at 4 to 5 EUR[246,247,248,249,250]. Based on desk research in the context of the impact assessment support study for the revision of the CBE Directive, it was found that Germany[251], the Netherlands[252], Belgium[253] and France[254] generally use 'standard' mail for sending penalty notices, and that Italy[255] and Spain[256] require the information letter to be sent via registered mail[257]. In the baseline scenario, it has thus been assumed that 50% of the letters are sent via registered mail and 50% via standard mail. Thus, the mailing cost per penalty notice sent abroad within EU was estimated at 3 EUR.

Total enforcement costs for Member States authorities related to driving disqualifications for (severe) speeding offences and for driving under the influence of alcohol are estimated at EUR 1.5 million in 2030 and EUR 1.1 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 horizon (in 2021 prices), the enforcement costs for Member States administrations are estimated at EUR 26.3 million in PM4. PM4 is only included in PO-B.

The estimated enforcement costs for Member States administrations, by Member State, are provided in Table 22.

Table 22: Enforcement costs for Member States administrations in PM4, relative to the baseline (in thousand)

	2030	2050
Austria	51.1	31.0
Belgium	88.5	54.6
Bulgaria	5.4	6.3
Cyprus	4.8	3.7
Croatia	16.7	17.0
Czech Republic	26.3	22.4
Denmark	2.0	1.5

245 Ecorys et al. (2022), *Impact Assessment support study for the revision of Directive (EU) 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences*
246 https://www.deutschepost.de/de/p/portoberater.html#/Brief/International/Rechteckig/bis_235_x_125_mm/bis_20_g/Guenstig
247 https://www.postnl.nl/versturen/brief-of-kaart-versturen/brief-of-kaart-buitenland/
248 https://www.bpost.be/nl/tarieven
249 https://www.poste.it/gamma/lettera.html
250 https://cennik-poczta--polska-pl.translate.goog/usluga,zagraniczny_przesylka_listowa.html?_x_tr_sl=pl&_x_tr_tl=en&_x_tr_hl=nl&_x_tr_pto=ajax,se,elem
251 https://www.bussgeldkatalog.org/bussgeldbescheid/per-einschreiben/
252 https://wetten.overheid.nl/BWBR0004581/2021-01-01
253 https://www.verkeerszaken.be/artikel/a/97/Wat-u-moet-weten-over-www-verkeersboeten-be
254 https://www.comparateur-stagespermis.com/infractions-et-amendes
255 https://quifinanza.it/info-utili/notifica-multa-quando-avviene/316997/
256 https://motor.elpais.com/conducir/no-sabes-si-te-han-puesto-una-multa-aqui-puedes-enterarte/
257 It should be noted that some Member States, such as Belgium and France, do sent letters via registered mail if no payment is made after the first letter has been sent via ordinary mail.

	2030	2050
Estonia	3.5	3.3
Finland	52.2	35.2
France	191.0	137.9
Germany	253.9	173.9
Greece	18.4	16.3
Hungary	12.3	12.6
Ireland	0.4	0.3
Italy	564.8	403.8
Latvia	3.5	3.2
Lithuania	10.6	10.3
Luxembourg	1.9	1.3
Malta	0.9	0.8
Netherlands	30.8	22.8
Poland	25.5	24.5
Portugal	5.7	5.1
Romania	9.0	9.9
Slovenia	4.5	4.0
Slovakia	1.3	1.3
Spain	72.2	54.2
Sweden	92.1	57.4
EU27	**1,549.3**	**1,114.7**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

PM5: Rules on consequences of penalty points for non-residents - Rules on rehabilitation in case of a change of normal residence

Enforcement costs for Member States administrations

In PM5, penalty points will be also applied to non-residents and driving disqualification resulting from penalty points system should be mutually recognised. PM5 would lead to enforcement costs for Member States administrations relative to the baseline, to ensure that penalty points are also applied on foreign drivers. The associated costs are related to the additional time spent on investigations and the costs associated to the notification of the foreign offender.

In order to calculate the costs associated to PM5, first an estimation of the increase in the number of cases where the penalty points need to be applied for (severe) speeding offences and for driving under the influence of alcohol relative to the baseline is needed.

The estimation follows a similar approach as for PM4. However, for driving under the influence of alcohol, the number of awarded penalty points is estimated by considering cases with a blood alcohol concentration above 0.5 (instead of 0.8 in PM4). As a result, 107,237 additional cases are estimated for 2030 and 167,558 for 2050 relative to the baseline. For speeding, a similar approach was used as for PM4, but drawing on data for Belgium the share of severe speeding offences that might result in penalty points has been estimated at 3.2%. As a result, the number of cases in which penalty points would be awarded has been estimated at 418,050 in 2030 and 439,357 in 2050 relative to the baseline.

The total number of cases where the penalty points need to be applied for (severe) speeding offences and for driving under the influence of alcohol is estimated at 525,288 in 2030 and 606,915 in 2050 relative to the baseline.

The same assumptions for the investigation costs and mailing costs per case have been used as in PM4. Total enforcement costs for Member States authorities are estimated at EUR 4.5 million in

2030 and EUR 3 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 horizon (in 2021 prices), the enforcement costs for Member States administrations are estimated at EUR 75.3 million in PM5. PM5 is only included in PO-C.

The estimated enforcement costs for Member States administrations, by Member State, are provided in Table 23.

Table 23: Enforcement costs for Member States administrations in PM5, relative to the baseline (in thousand)

	2030	2050
Austria	180.3	108.8
Belgium	301.9	183.3
Bulgaria	11.8	12.9
Cyprus	14.2	10.4
Croatia	39.4	37.3
Czech Republic	79.1	63.7
Denmark	6.0	4.2
Estonia	9.1	7.9
Finland	162.8	104.5
France	516.9	346.8
Germany	732.8	470.1
Greece	47.1	38.7
Hungary	27.9	25.9
Ireland	1.1	0.7
Italy	1,583.0	1,056.1
Latvia	10.5	8.9
Lithuania	27.3	24.2
Luxembourg	5.5	3.6
Malta	2.6	2.1
Netherlands	81.5	56.1
Poland	66.7	59.1
Portugal	14.2	11.8
Romania	18.2	18.9
Slovenia	12.1	9.9
Slovakia	2.6	2.6
Spain	229.2	165.8
Sweden	311.9	190.3
EU27	**4,495.4**	**3,024.8**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

PM 6: Rules on simple medical screening

In PM6 non-binding guidelines would be established for assessing applicants' vision for group 1 drivers (A and B category licence). Medical screening will be mandatory at renewal for group 1 drivers, based on a self-assessment triggering assessments by a general practitioner and/or a specialist if required. More frequent medical screening will be possible for drivers of the age of 70 years old. In addition, an instrument will be established to prepare training material related to medical screening for general practitioners (in all EU languages). PM6 is only included in PO-B.

Adjustment costs for the European Commission

PM6 would require the development of an (online) training programme for general practitioners. The costs for developing the online content of the training programme are estimated at EUR 8,500 to

36,000 per hour[258]. Thus, a four hour online training is estimated at EUR 33,500 to EUR 142,000, depending on the level of detail. The training programme is assumed to be updated regularly (once every five years), starting from 2025. Expressed as present value over the 2025-2050 horizon (in 2021 prices), the adjustment costs for the European Commission are estimated at EUR 0.1 to 0.6 million.

Adjustment costs for general practitioners

The number of general practitioners (GPs) in the EU is estimated at around 460 thousand[259] and it is projected to increase to around 484 thousand by 2030 and 544 thousand by 2050 in the baseline scenario, increasing at somewhat lower rates than in the past. To estimate the number of (online) training courses required, it is assumed that each GP needs to attend the training each five year starting from 2025 and the class size is of 15 GPs[260]. PM6 is expected to lead to additional training courses for GPs in all MS except for EL, HU, IT, LV, PL, RO and ES that are expected to continue to implement a stricter screening (medical assessment instead of screening) and for which a training of GPs to support the screening is not required. Thus, PM6 is expected to lead to 4,515 additional (online) training courses for general practitioners in 2030 and 5,057 in 2050, relative to the baseline. The training is assumed to take four hours and the cost for the trainer is assumed at EUR 150 per hour on average at EU level. The adjustment costs for general practitioners in PM6 are estimated at EUR 3.1 million in 2030 and EUR 3.4 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 horizon (in 2021 prices), they are estimated at EUR 57.7 million.

Adjustment costs savings for citizens

In PM6 more frequent medical screening would be possible for drivers above 70 years old. However, this measures needs to be assessed in combinations with PMc11, where shorter administrative validity for the driving licences for A and B categories than 15 years would not be allowed for fit drivers before 70 years old. The measure only affects the holders of driving licences for A and B categories.

Data for driving licences by age group are available for DE[261], IT[262], NL[263], LV[264], SK[265], FI[266] and SE[267]. On average, for these Member States 16% of licences for A and B categories are attributed to drivers above 70 years old, 21% to drivers above 65 year old, 29% to drivers above 60 years old and 47% to drivers above 50 years old. To estimate the number of driving licences by age group at EU level, the average share by age group has been assumed for MS where data is not available. In the following step, the number of 'age-dependent' medical tests that were conducted in the period 2017-2021 was estimated by applying the current rules per Member State to the number of licences held by elder people. In the baseline scenario, the number of 'age-dependent' medical tests has been assumed to grow in line with the population projections from Eurostat for the relevant age group[268].

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258 https://raccoongang.com/blog/how-much-does-it-cost-create-online-course/
259 Source : Eurostat (hlth_rs_sp)
260 Literature suggests that a class size of 12 to 21 is deemed optimal.
261 https://www.kba.de/DE/Statistik/Kraftfahrer/Fahrerlaubnisse/Fahrerlaubnisbestand/fahrerlaubnisbestand_node.html
262 https://www.anfia.it/data/studi-e-statistiche/automobili-cifre/miscellaneous/08italiapatenti.xlsx
263 https://opendata.cbs.nl/statline/#/CBS/nl/dataset/83488NED/table?ts=1659960260602
264 https://www.csdd.lv/vaditaja-apliecibas/vaditaja-apliecibas
265 https://www.minv.sk/?statisticke-prehlady-agendy-vodicov-a-vodicskych-preukazov
266 https://trafi2.stat.fi/PXWeb/pxweb/fi/TraFi/TraFi__Ajokortit/010_ajok_tau_101.px/
267 https://www.transportstyrelsen.se/sv/vagtrafik/statistik/Korkort/Statistik-over-korkortsinnehavare-efter-kon/
268 Source : Eurostat (PROJ_19NP)

To estimate the impact of PM6, an assessment was made for Member States that currently use the provision of the Directive to reduce the administrative validity of licences for people above 50 years old. Thus, the reduction in the number of medical tests has been estimated for lifting the age limit from 50 to 70 years old. This yields significant differences by Member State:

1. For 6 Member States (AT, BE, DE, PL, RO and SE), no impact is expected as they do not make use of the possibility to reduce the administrative validity to increase the frequency of medical testing.
2. For 6 Member States (CY, EE, FI, IE, NL, SI), no impact is expected as they have chosen an age limit that is either at 70 years old (CY, EE, FI, IE, SI) or above (75 year old for NL).
3. For 3 Member States (BG, HR and MT), no information is available and the impact has thus not been quantified. This implies that they are assumed not to be affected by PM6.
4. For the remaining Member States, a reduction in the number of medical tests is expected as they currently shorten the administrative validity of driving licences for A and B categories below 70 years old (DK, FR, HU, LT and LV to 50 years old; CZ, LU and PT to 65 years old; EL, ES, IT and SK to 65 years old).

For Member States that require a medical fitness check to be conducted every time that the driving licences for A and B categories are renewed (EL, ES, HU, IT, LV and PL) the impact is adjusted taking into account the renewal, to avoid overestimating the reduction in the number of 'age-dependent' medical tests.

The reduction in the number of 'age-dependent' medical tests relative to the baseline, by Member State, is provided in Table 24. At EU level, the measure is estimated to result in a reduction of the medical tests by 3.6 million in 2030 and 3.4 million in 2050 relative to the baseline.

Table 24: Reduction in the number of 'age-dependent' medical tests in PM6, relative to the baseline (in thousand)

	2030	2050
Austria	-	-
Belgium	-	-
Bulgaria	-	-
Cyprus	-	-
Croatia	-	-
Czech Republic	136	140
Denmark	63	60
Estonia	-	-
Finland	-	-
France	2,171	2,102
Germany	-	-
Greece	82	74
Hungary	306	267
Ireland	-	-
Italy	399	370
Latvia	7	6
Lithuania	82	53
Luxembourg	9	10
Malta	-	-
Netherlands	-	-
Poland	-	-
Portugal	48	37
Romania	-	-
Slovenia	-	-

	2030	2050
Slovakia	43	48
Spain	210	195
Sweden	-	-
EU27	**3,556**	**3,364**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

Data on costs for a medical test is available for 23 Member States. The average cost for the 23 Member States (EUR 47 per test) has been applied to the 4 Member States (BG, CY, MT and PT) for which data is missing. However, for BG, CY and MT the measure is not expected to have an impact.

Thus, the changes in the rules for the consultation of the GP for elderly people (above 70 years old) lead to adjustment costs savings estimated at EUR 131 million in 2030 and EUR 124.2 million in 2050 relative to the baseline for PM6. Expressed as present value over the 2025-2050 period, the adjustment costs savings for citizens are estimated at EUR 2,414 million.

The reduction in costs with 'age-dependent' medical tests relative to the baseline, by Member State, is provided in Table 25.

Table 25: Reduction in costs with the 'age-dependent' medical tests in PM6, relative to the baseline (in million)

	2030	2050
Austria	-	-
Belgium	-	-
Bulgaria	-	-
Cyprus	-	-
Croatia	-	-
Czech Republic	2.8	2.9
Denmark	3.4	3.2
Estonia	-	-
Finland	-	-
France	78.2	75.7
Germany	-	-
Greece	1.6	1.5
Hungary	2.8	2.4
Ireland	-	-
Italy	24.0	22.2
Latvia	0.3	0.2
Lithuania	2.1	1.3
Luxembourg	0.5	0.5
Malta	-	-
Netherlands	-	-
Poland	-	-
Portugal	2.3	1.8
Romania	-	-
Slovenia	-	-
Slovakia	0.7	0.8
Spain	12.6	11.7
Sweden	-	-
EU27	**131.0**	**124.2**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

Adjustment costs for citizens

PM6 includes the screening of fitness to drive for each driver renewing its driving licence, independent of age and a vision test for applicants.

For the *screening of fitness to drive for each driver renewing their driving licence independent of age*, several MS (AT, BE, CY, FI, IE, NL, PT and SE) already apply the measure and thus PM6 would not have an impact on them relative to the baseline. Other MS (EL, ES, HU, IT, LV, PL, RO) require a medical test at the renewal of their driving licence and thus PM6 would not have an impact on them. For the remaining MS (BG, CZ, DE, DK, EE, FR, HR, LU, LT, MT, SI, SK), the estimated number of renewed licences per year is used to estimate the number of self-assessments. In addition, it is assumed that some 8% of all self-assessments would result in a medical test, drawing on the practices regarding periodic screening for the UK[269]. The increase in the number of medical tests is estimated at 0.2 million in 2030 and 0.5 million in 2050 relative to the baseline. Making use of the average cost per medical test by MS, the adjustment costs for citizens are estimated at EUR 18.1 million in 2030 and EUR 37.6 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, they are estimated at EUR 552.9 million relative to the baseline (in 2021 prices).

For the *vision test*, only CY, FR and NL currently use a 'licence-plate self-test', while the other MS require a vision test. For the 'licence-plate self-test', applicants for a driving licence are asked prior to their practical exam to read the licence plate of a vehicle that is at some 15 to 20 meters distance. As non-binding rules will be established for assessing applicants' vision in PM6, it has been assumed that only CY and NL implement the measure. The additional number of tests relative to the baseline are estimated at 404,787 in 2030 (22,782 for CY and 382,004 for NL) and 418,209 in 2050 (24,117 for CY and 394,032 for NL). Assuming a cost per vision test of EUR 15 to 75 in NL[270] and EUR 9 to 46 EUR in CY, the adjustment costs for citizens are estimated at EUR 5.9 to 29.7 million in 2030 and EUR 6.1 to 30.7 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, they are estimated at EUR 110.7 to 553.7 million relative to the baseline (in 2021 prices).

The total adjustment costs for citizens for the screening of fitness to drive for each driver renewing their driving licence independent of age and for the vision test are estimated at EUR 24 to 47.8 million in 2030 and EUR 43.8 to 68.3 million in 2050. Expressed as present value over the 2025-2050 period, they are estimated at EUR 663.6 to 1,106.6 million relative to the baseline (in 2021 prices).

PM7: Rules on advanced medical screening

In PM7 the applicants' vision will be checked by certified professionals for group 1 (A and B category licence) drivers. Medical screening will be mandatory at renewal for group 1 drivers, based on a self-assessment filled out with a general practitioner triggering specific assessments if required. Administrative validity of driving licences of group 1 will be shorten to 5 years for drivers of the age of 65 years old or above to enable more frequent medical screening. An instrument will be established to prepare training material related to medical screening for general practitioners (in all EU languages). PM7 is only included in PO-C.

Adjustment costs for the European Commission

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[269] Source: https://www.nhs.uk/conditions/nhs-health-check/what-is-an-nhs-health-check-new/; In the UK, the assessment is performed by a professional. Under PM6, a self-assessment is assumed without the involvement of a GP. For this reason it is assumed that the procedure is less effective and thus some people that might be medically unfit would not be identified. Therefore, the figure for UK (16.1%) is scaled down by 50% to account for this.

[270] https://kostentracker.nl/oogtest-kosten-prijsvoorbeelden-en-meer

In PM7 the adjustments costs for the European Commission are the same as those in PM6. Expressed as present value over the 2025-2050 horizon (in 2021 prices), they are estimated at EUR 0.1 to 0.6 million.

Adjustment costs for general practitioners

In PM7 the adjustments costs for the general practitioners are the same as those in PM6. The adjustment costs are estimated at EUR 3.1 million in 2030 and EUR 3.4 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 horizon (in 2021 prices), they are estimated at EUR 57.7 million.

Adjustment costs for citizens

In PM7 the administrative validity of driving licences of group 1 will be shorten to 5 years for drivers of the age of 65 years old or above to enable more frequent medical screening.

The assessment follows the same logic as that for PM6. However in this case all Member States are required to test all group 1 drivers above 65 years old every 5 years. As for PM6 this yields significant differences by Member State:

1. For the 5 Member States (AT, BE, DE, PL, RO and SE) that do not make use of the possibility to reduce the administrative validity to increase the frequency of medical testing, PM7 would lead to an increase of testing for drivers above 65 years old.
2. For the 6 Member States (CY, EE, FI, IE, NL, SI), that have chosen an age limit above 70 years old, PM7 would also lead to an increase in testing for drivers above 65 years old.
3. For 3 Member States (BG, HR and MT), no information is available and the impact has thus not been quantified. This implies that they are assumed not to be affected by PM7.
4. For the 4 Member States (EL, ES, IT and SK) that have chosen an age limit above 65 years old, PM7 is expected to have no impact relative to the baseline.
5. For the remaining 9 Member States, a reduction in the number of medical tests would be expected as they currently shorten the administrative validity of driving licences for A and B categories below 65 years old (DK, FR, HU, LT and LV to 50 years old; CZ, LU and PT to 60 years old). However, in the baseline in DK medical tests are conducted every 15 years from the age of 50. In PM7 the frequency is increased to 5 years above 65 years old. For this reason, PM7 also leads to an increase in the number of medical tests in DK relative to the baseline. Similarly, for PT medical tests are conducted every 15 years from the age of 60. PM7 would thus lead to an increase in the number of medical tests in PT relative to the baseline.

The change in the number of 'age-dependent' medical tests relative to the baseline, by Member State, is provided in Table 26. At EU level, the measure is estimated to result in an increase in the number of medical tests by 2.6 million in 2030 and 3.2 million in 2050 relative to the baseline.

Table 26: Change in the number of 'age-dependent' medical tests in PM7, relative to the baseline (in thousand)

	2030	2050
Austria	243	294
Belgium	301	353
Bulgaria	-	-
Cyprus	15	17
Croatia	-	-
Czech Republic	-82	-84
Denmark	44	57

	2030	2050
Estonia	19	22
Finland	48	45
France	-1,818	-1,771
Germany	1,842	1,921
Greece	-	-
Hungary	-278	-238
Ireland	44	55
Italy	-	-
Latvia	-3	-2
Lithuania	-65	-44
Luxembourg	-5	-5
Malta	-	-
Netherlands	349	339
Poland	1,025	1,182
Portugal	177	217
Romania	321	356
Slovenia	10	9
Slovakia	-	-
Spain	-	-
Sweden	375	453
EU27	**2,561**	**3,175**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

The adjustment costs for citizens due to the shortening of the administrative validity of driving licences of group 1 to 5 years for drivers of the age of 65 years old or above are estimated at EUR 300.6 million in 2030 and EUR 330.5 million in 2050 relative to the baseline for PM7. Expressed as present value over the 2025-2050 period, they are estimated at EUR 5,744.4 million.

The change in costs with 'age-dependent' medical tests relative to the baseline, by Member State, is provided in Table 27.

Table 27: Change in costs with the 'age-dependent' medical tests in PM7, relative to the baseline (in million)

	2030	2050
Austria	8.5	10.3
Belgium	21.9	25.7
Bulgaria	-	-
Cyprus	0.7	0.8
Croatia	-	-
Czech Republic	-1.7	-1.7
Denmark	2.4	3.1
Estonia	0.8	0.9
Finland	6.4	6.1
France	-65.5	-63.8
Germany	248.6	259.3
Greece	-	-
Hungary	-2.5	-2.1
Ireland	2.2	2.7
Italy	-	-
Latvia	-0.1	-0.1
Lithuania	-1.6	-1.1
Luxembourg	-0.2	-0.2
Malta	-	-

	2030	2050
Netherlands	14.5	14.1
Poland	43.2	49.9
Portugal	8.4	10.3
Romania	8.7	9.6
Slovenia	0.6	0.5
Slovakia	-	-
Spain	-	-
Sweden	5.3	6.4
EU27	**300.6**	**330.5**

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study

For the *screening of fitness to drive for each driver renewing their driving licence independent of age*, the approach is similar to PM6 and would result in an increase in the number of self-assessments in BG, CZ, DE, DK, EE, FR, HR, LU, LT, MT, SI and SK. However, in this case as the self-assessment will be filled out with a general practitioner, some 16% of all self-assessments would result in a medical test, drawing on the practices regarding periodic screening for the UK[271]. The increase in the number of medical tests is estimated at 0.5 million in 2030 and 1 million in 2050 relative to the baseline. The adjustment costs for citizens are estimated at EUR 36.2 million in 2030 and EUR 75.2 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, they are estimated at EUR 1,105.8 million relative to the baseline (in 2021 prices).

For the *vision test*, also FR would be required to replace the 'licence-plate self-test' by a vision test (in addition to CY and NL which already do so in PM6), due to the mandatory nature of the measure. For FR the additional number of tests relative to the baseline are estimated at 1.7 million in 2030 and 1.8 million in 2050 and the adjustment costs at EUR 27.2 to 136 million in 2030 and EUR 28.5 to 142.3 million in 2050. Thus, the total adjustment costs for citizens for the vision test in PM7 (for CY, NL and FR) are estimated at EUR 33.1 to 165.7 million in 2030 and at EUR 34.6 to 173 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, they are estimated at EUR 622.1 to 3,110.7 million relative to the baseline (in 2021 prices).

The total adjustment costs for citizens for the shortening of the administrative validity of driving licences of group 1 to 5 years for drivers of the age of 65 years old or above, for the screening of fitness to drive for each driver renewing its driving licence independent of age and for the vision test are estimated at EUR 369.9 to 502.5 million in 2030 and EUR 440.4 to 578.8 million in 2050. Expressed as present value over the 2025-2050 period, they are estimated at EUR 8,377.6 to 10,866.2 million relative to the baseline (in 2021 prices).

PM 8: Removal of the staging requirement to obtain a licence of category CE or DE

Administrative cost savings for road transport operators

In PM8, the removal of the requirement to hold a licence of category C or D to obtain a licence of category CE or DE is expected to lead to administrative costs savings for professional drivers that benefit road transport operators.

Based on information from France and Germany, about 37% to 40% (FR and DE) of all C exams (C, C1E or C1E) concern CE exams. The professional drivers that have conducted a test for a CE licence had already obtained a C licence, which is currently required by the Directive. For D licences, no

[271] Source: https://www.nhs.uk/conditions/nhs-health-check/what-is-an-nhs-health-check-new/

information is available, but buses are generally less likely to drive with a trailer than heavy goods vehicles. To estimate the impact of the measure, it has been assumed that the number of C and D tests would decrease by 30% relative to the baseline.

PM8 would lead to a reduction in the number of theoretical and practical tests required to obtain a CE or DE category licence, estimated at 469,349 in 2030 and 572,082 in 2050, relative to the baseline. The administrative costs savings for road transport operators in PM8 are thus estimated at EUR 44.8 million in 2030 and EUR 53.8 million in 2050 relative to the baseline[272]. Expressed as present value over the 2025-2050 horizon (in 2021 prices), total administrative costs savings for road transport operators are estimated at EUR 875.3 million in PO-B and PO-C.

PM 9: Flexibility for the first issuance of driving licences in case of restrictions related to languages

This measure would only affects a fairly small number of cases. The demand for tests in other languages is relatively small (for example, in Spain about 1.5% of all theoretical exams are conducted in another language) and the measure only affects Member States that do not allow for interpreters or facilitate a test conducted in another language. There are no significant impacts expected on costs although PM9 may result in some reduction of the hassle costs for citizens.

PM 10: Mutual recognition of physical and mental assessment

There are no significant impact on costs expected due to PM10.

PM 11: New optional equivalence related to vehicles with limited maximum speed

There are no significant impact on costs expected due to PM11.

PM 12: Rules on the removal of code 70

Administrative costs savings for citizens

In PM12 the Code 70 will be removed from the licence when the driver has been holding an EU licence for at least 5 years and has not committed serious road traffic offenses. PM 12 is included in PO-C only.

In the baseline, holders of a third country licence are restricted via Code 70. Other EU Member States may decide not to recognise the licence. As such, these holders may have to conduct a driving test (theoretical and practical) to be able to obtain an EU licence when changing residence. On an annual basis, some 8 to 9% of third country licence holders (with Code 70) change residence within EU.

In PM12 (included in PO-C), the code 70 is assumed to be removed from the licence when the driver has been holding an EU licence for at least 5 years and has not committed serious road traffic offenses. By implementing PM12 it is expected that fewer holders of a third country licence would conduct a driving test to obtain an EU licence that can also be exchanged when the holder changes residence. Thus, the number of tests is estimated to decrease by 7,235 in 2030 and 7,552 in 2050 relative to the baseline. The administrative costs savings for citizens are estimated at EUR 1 million

[272] The average cost per theoretical test for a category C licence is estimated at EUR 42, based on data for 17 Member States, and the average cost per practical test at EUR 134. For category D licence, the average cost per theoretical test is estimated at EUR 43, based on data for 17 Member States, while the average cost per practical test at EUR 136. For the Member States for which data was not available, the average cost per test for the 17 Member States has been used.

in 2030 and EUR 1.1 million in 2050 relative to the baseline. Expressed as present value over the 2025-2050 period, they are estimated at EUR 19.3 million relative to the baseline (in 2021 prices) in PO-C.

PM 13: New optional equivalence related to bus without passengers

The measure is expected to lead to limited impact on costs savings as the holder of a driving licence of category C would be authorised to drive a bus without passengers on the territory of his or her issuing state, if that later has decided to implement this optional equivalence. However, the costs savings are not expected to be significant and it was not possible to quantify them.

PM 14: Rules on the exchange of foreign driving licences

PM14 is expected to lead to some limited costs savings for citizens. However, it was not possible to estimate the impacts on costs savings.

4. IMPACTS BY POLICY MEASURE ON SAFETY

This section explains the inputs used and provides the assessment of the impacts of the policy measures included in the policy options on safety. Only the measures with significant impact, that have been quantified, are included. The synergies between the measures included in the options are already captured in this section. A qualitative assessment of the impact on road safety of the remaining policy measures is provided in Annex 10.

PMc1: Update of standards on skills and knowledge to be met for the first issuance of a driving licence

The road safety impact PMc1 and in particular of the Hazard Perception Test (HPT) was estimated based on findings from the UK. Research from the UK indicate that drivers that have passed an HPT are 2.5% less likely to be engaged in an accident in the first three years after having passed this exam, when accidents on all public roads are considered[273]. The study also showed that the HPT would reduce the number of accidents in the first year of driving by 1.4%. A conservative approach has been used in our assessment, drawing on the impact assessment support study, taking into account the effect of the HPT in the first year of driving.

This is used to estimate the impact of PMc1. However, as the data extracted from the CARE database consists of novice drivers with less than 5 years of experience, an adjustment was needed. This was done by considering that drivers in their first year of driving are more accident prone than drivers in years 2 to 5. More specifically, it was found that 46% of all driver fatalities occur within the group of novice drivers will less than 2 years of experience. It was further assumed that 55% of all fatalities of novice drivers with less than 2 years of experience are attributed to novice drivers with less than 1 year of experience. This results in an estimated 0.4% reduction in the car fatalities in which novice drivers are involved, for countries that did not implement the HPT in the baseline (all MS except for Belgium[274], Germany, Finland and the Netherlands[275]). The number of lives saved is thus estimated at 10 in 2030 and 8 in 2050 at EU level, relative to the baseline, while the number of serious injuries

[273] Table A5.10 from RSRR81 - Cohort II - A study of learner and new drivers. Volume 1 - main report.

[274] https://assets-global.website-files.com/604a00a4df74a7000318621d/607edfdbcec6a17747865d44_20-3137_Goca_jaarverslag2019_NL_20200505-small.pdf

[275] European Commission, Directorate-General for Mobility and Transport, Vlakveld, W., Fernández-Medina, K., Oxley, J., et al., Study on driver training, testing and medical fitness : final report, Publications Office, 2017 (for DE, FI and NL).

avoided at 96 in 2030 and 76 in 2050. PMc1 is part of all policy options and its impact is the same across options.

PMc11: Improvement and simplification of rules on administrative validity

In PMc11, the 15 years long administrative validity of driving licences for A and B categories will be made mandatory and exclusive. As explained in section 3 of Annex 4, the Directive currently requires an administrative validity period of 10 years, but allows Member States to also issue licence for 15 years. For Member States that are already issuing licences for 15 years by default (AT, CY, CZ, DE, FI, FR, EL, LU, PL, PT, SK and DK) the measure would have no impact. For all other Member States, the number of licences that would have to be renewed is estimated to decrease by 1.8 million in 2030 and 3.7 million in 2050.

This implies that in some Member States the number of medical checks for the renewal of the driving licences would be reduced relative to the baseline. A study for the Netherlands showed that people older than 70 were in 0.8% of cases deemed medically unfit to drive[276]. A larger group (36.2%) was deemed fit, however with restrictions. In most cases, these restrictions concerned requirements to wear glasses or not to drive during night time. It must be noted that most of the tested people that were restricted to only drive with glasses, already used glasses prior to medical test. Thus, the imposed restriction was mainly of an administrative nature, with no significant impact on road safety. For this reason, for the assessment, only the people that are deemed unfit to drive are assumed to pose a real threat to road safety.

For assessing the impact of the measure on safety, it has been assumed that if the number of the medical checks in a Member State is reduced, the number of fatalities in which unfit drivers are involved would increase by 0.8%. The increase in the number of fatalities at EU level is estimated at 7 in 2030 and 5 in 2050 relative to the baseline, while the number of serious injuries avoided at 67 in 2030 and 48 in 2050.

PM1: Rules on training and probation periods - Recommendation on lifelong training

The *road safety impact of accompanied driving* was derived based on findings from five countries that have implemented the system (Germany[277], Sweden[278], Netherlands[279], France[280] and Norway[281]). The studies show different effects, with a significant positive impact in Sweden (35% reduction in fatalities in which novice drivers with less than 2 years of experience are involved) and no significant impact observed in France, Netherlands and Norway. For Germany, the reduction in the number of fatalities in which novice drivers are involved was estimated at 23%. For assessing the impact of accompanied driving in PM1 the average of the five countries is used. To be conservative, the estimate has been further scaled down by 50%. In addition, based on data for the Netherlands, it has been assumed that 35% of all applicants for a B licence would make use of the possibility to

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[276] https://www.rivm.nl/bibliotheek/rapporten/280001001.pdf

[277] Schade, F.-D. & Heinzmann, H.-J. (2011). Sicherheitswirksamkeit des Begleiteten Fahrens ab 17. Summative Evaluation. BASt-Bericht Mensch und Sicherheit, Heft M 218. Bundesanstalt für Straßenwesen (BASt), Bergisch Gladbach. https://bast.opus.hbz-nrw.de/opus45-bast/frontdoor/deliver/index/docId/544/file/M218.pdf

[278] Gregersen, N.P., Berg, H,-Y., Engström, I., Nolén, S., et al. (2000). Sixteen years age limit for learner drivers in Sweden - an evaluation of safety effects. In: Accident Analysis & Prevention, vol. 32, nr. 1, p. 25-35.

[279] https://swov.nl/system/files/publication-downloads/r-2015-11.pdf

[280] Page, Y., Ouimet, M.C. & Cuny, S. (2004). An evaluation of the effectiveness of the supervised driver training system in France. In: Proceedings of the 48th Annual Conference of the Association for the Advancement of Automotive Medicine AAAM, 13-15 September 2004, Key Biscayne, Florida. p. 131-145.

[281] OECD & ECMT (2006). Young drivers: the road to safety. Joint OECD/ECMT Transport Research Centre, Paris.

obtain the licence at the age of 17 and drive accompanied. Further correcting for the fact that the group of novice drivers below 5 years is used (as in PMc1), the road safety impact of accompanied driving in PM1 is estimated at a 0.9% reduction in the number of fatalities in which novice drivers are involved. No impact relative to the baseline was assumed for MS that already implement accompanied driving (BE, DE, FR, EL, IE, NL and SE)[282].

For the *strict rules related to driving under influence (zero tolerance) for novice drivers*, the road safety impact was derived by considering a study for Belgium[283] on the impact of introducing an alcohol limit for novice drivers. The study found that this measure could decrease the number of fatalities in Belgium by 2 to 4. The study for Belgium considered all drivers in the age group of 18-24, as a proxy for novice drivers. Using the lower estimate and the total number of fatalities in which novice drivers are involved in Belgium, this implies a reduction by 1.2% in fatalities in which novice drivers are involved. Further correcting for the group of novice drivers with experience of less than five years, the impact of strict rules related to driving under influence (zero tolerance) for novice drivers is estimated at a 0.9% reduction in the number of fatalities for novice drivers. In addition, the measure is assumed to have no impact relative to the baseline for MS that already have in place a probation period[284] (AT, DE, FR, HR, IE, IT, LV, NL PT, SI).

PM1 is jointly implemented together with PMc1 in the PO-B and PO-C. Both measures target the same group of drivers (i.e. novice drivers), however they have a different and complementary impact. However, as the same fatality cannot be reduced twice, the impact of measure PM1 is only applied to fatalities in which novice drivers are involved that are not prevented by PMc1. The reduction in the number of fatalities at EU level due to PM1 is estimated at 32 in 2030 and 29 in 2050 relative to the baseline, while the number of serious injuries avoided at 306 in 2030 and 277 in 2050.

PM4: Mutual recognition of driving disqualifications

The estimation of the number of driving disqualifications resulting from driving under the influence of alcohol has been explained in the previous section of Annex 4, in relation to the impacts on costs.

Road safety impacts due to driving disqualifications resulting from driving under the influence of alcohol. In order to estimate the impacts on road safety, first the share of fatalities attributed to alcohol was estimated. A recent study estimated that some 19% to 26% of all fatalities are attributed to alcohol, with an average estimate of 22.5%[285]. The share of fatalities attributed to alcohol in the total number of fatalities is assumed to remain constant over time in the baseline scenario.

The impact has been estimated by considering: (i) the relative increase in the driving disqualifications resulting from driving under the influence of alcohol relative to the baseline; (ii) the reduction in the crash rate as a result of suspending licences, estimated at 17% based on road safety cube estimates[286]. In addition, an adjustment has been made using the share of fatalities in which a foreign registered

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[282] EReg (2022) The Vehicle and Driver Chain in Europe 2022, EReg – Association of European Vehicle and Driver Registration Authorities, Brussels.

[283] Nathalie Moreau, Heike Martensen, Stijn Daniels, Lowering the legal alcohol limit in Belgium? – Potential effects on the number of traffic victims, Brussels, Belgium: Vias institute – Knowledge Centre Road Safety https://www.vias.be/publications/Verlaging%20van%20de%20wettelijke%20alcohollimiet%20in%20Belgi%C3%AB/Lowering_the_legal_alcohol_limit_in_Belgium.pdf

[284] ETSC PIN Flash Report 41 https://etsc.eu/wp-content/uploads/PIN-Flash-41_web_FINAL.pdf

[285] European Commission, Directorate-General for Mobility and Transport, Modijefsky, M., Janse, R., Spit, W., et al., *Prevention of driving under the influence of alcohol and drugs*, Publications Office of the European Union, 2022, https://data.europa.eu/doi/10.2832/218096.

[286] https://www.roadsafety-dss.eu/assets/data/pdf/synopses/Licence_suspension_27062017.pdf

vehicle is involved in relation to the number of traffic offences in which a foreign registered vehicle is involved. This adjustment has been performed to correct for possible differences in offence/accident ratios for foreign drivers that generally drive on safer roads, such as highways, and draws on data from the CARE database and the impact assessment support study for the revision of the CBE Directive[287]. In addition, PM4 is jointly implemented together with PMc1 and PM1 in PO-B. A correction is made to reflect the fact that PM1 and PM4 apply to different drivers groups (i.e. while PM1 is mainly targeted at novice drivers, PM4 addresses all drivers). In addition, as the same fatality cannot be reduced twice, the impact is assessed for fatalities involving novice drivers that are not prevented by PMc1 and PM1.

Road safety impacts due to driving disqualifications resulting from speed driving. The impact has been estimated by considering: (i) the relative increase in the driving disqualifications resulting from severely speeding relative to the baseline; (ii) the impact of speed enforcement drawing on Elvik et al. (2015)[288]. It is estimated that 0.9% of all speeding offences are sufficiently severe to risk losing the licence[289]. The estimated impact of traffic rules enforcement draws on Elvik et al. (2015)[290]. This study, conducted in the framework of the Road Safety Cube, found that a 1% increase in the speed enforcement level is associated with 0.6% to 0.7% decrease in the number of road accidents. In addition, an adjustment has been made using the share of fatalities in which a foreign registered vehicle is involved in relation to the number of traffic offences in which a foreign registered vehicle is involved, drawing on data from the CARE database and the impact assessment support study for the revision of the CBE Directive[291]. This adjustment has been performed to correct for possible differences in offence/accident ratios for foreign drivers that generally drive on safer roads, such as highways. As the same fatality cannot be prevented twice, the impact is assessed for fatalities involving novice drivers that are not prevented by PMc1, PM1 and PM4 (alcohol). The reduction in the number of fatalities at EU level is estimated at 5 in 2030 and 3 in 2050 relative to the baseline, while the number of serious injuries avoided at 48 in 2030 and 29 in 2050.

PM5: Rules on consequences of penalty points for non-residents - Rules on rehabilitation in case of a change of normal residence

For PM5, the assessment of the road safety impacts follows a similar approach as for PM4. However, a lower BAC-limit was considered and thus a higher number of offences can be successfully enforced. In addition, the impact on the crash rates has been assumed at 16% based on the Road Safety Cube linked to the introduction of the penalty points system[292]. As the impact is slightly smaller but the affected group larger, the impact of PM5 is expected to be slightly higher than that of PM4.

In addition, PM5 is jointly implemented together with PMc1 and PM1 in PO-C. A correction is made to reflect the fact that PM1 and PM5 apply to different drivers groups (i.e. while PM1 is mainly targeted at novice drivers, PM5 addresses all drivers). In addition, as the same fatality cannot be reduced twice, the impact is assessed for fatalities involving novice drivers that are not prevented by PMc1 and PM1. The reduction in the number of fatalities at EU level is estimated at 9 in 2030 and 7

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[287] Ecorys et al. (2022), *Impact Assessment support study for the revision of Directive (EU) 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences*

[288] Elvik, R. (2015). Methodological guidelines for developing accident modification functions. Accident Analysis & Prevention 80(3), 26-36. Doi: 10.1016/j.aap.2015.03.038.

[289] https://www.verkeersstatistieken.federalepolitie.be/verkeersstatistieken/interactief/

[290] ibid.

[291] Ecorys et al. (2022), *Impact Assessment support study for the revision of Directive (EU) 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences*

[292] Goldenbeld, Ch (2017), Demerit point system, European Road Safety Decision Support Systems, developed by the H2020 project SafetyCube.

in 2050 relative to the baseline, while the number of serious injuries avoided at 86 in 2030 and 67 in 2050.

PM6: Rules on simple medical screening

Shortening the administrative validity of driving licences of category A and B licences to 5 years for drivers of the age of 70 years old or above, to enable more frequent medical screening. A study for the Netherlands showed that people older than 70 were in 0.8% of cases deemed medically unfit to drive[293]. A larger group (36.2%) was deemed fit, however with restrictions. In most cases, these restrictions concerned requirements to wear glasses or not to drive during night time. It must be noted that most of the tested people that were restricted to only drive with glasses, already used glasses prior to medical test. Thus, the imposed restriction was mainly of an administrative nature, with no significant impact on road safety. For this reason, for the assessment, only the people that are deemed unfit to drive are assumed to pose a real threat to road safety, which represents a conservative assumption. The same share of people unfit to drive is assumed for the age group 50 to 70 years old, in lack of more detailed information.

The change in the number of medical check due to PM6 are provided in section 3 of Annex 4. At EU level, the reduction in the medical checks is estimated at 3.6 million in 2030 and 3.4 million in 2050 relative to the baseline.

For assessing the impact of the measure on safety, it has been assumed that if the number of the medical checks in a Member State is reduced, the number of fatalities in which drivers of 50 to 70 years old are involved would increase by 0.8%. Member States that do not test based on age, or adopt a higher age limit than 70, are unaffected by the measure. Thus, as explained in section 3 of Annex 4, the measure is expected to only have an impact for DK, FR, HU, LT, LV, CZ, LU, EL, ES, IT and SK.

Medical screening at renewal, based on a self-assessment triggering assessments by a general practitioner if required. Several MS (AT, BE, CY, FI, IE, NL, PT and SE) already apply the measure and thus PM6 would not have an impact on them relative to the baseline. Other MS (EL, ES, HU, IT, LV, PL, RO) require a medical test at the renewal of their driving licence and thus PM6 would not have an impact on them. For the remaining MS (BG, CZ, DE, DK, EE, FR, HR, LU, LT, MT, SI, SK), the increase in the number of medical tests is estimated at 0.2 million in 2030 and 0.5 million in 2050 relative to the baseline, as explained in section 3 of Annex 4.

According to results of the survey conducted in the context of the impact assessment support study, a range of 5-15% of all traffic accidents were attributed to driver's medical condition. This range is confirmed by multiple sources: the ETSC PIN Flash Report 40 (2021) indicates that, in Finland, 16% of all fatal collisions are attributed to a driver illness[294]. In France, close to 4% of total accidents was attributed to medication[295]. A Danish report296 revealed that, during the period 2017-2019, 9% of traffic accidents was attributed to impaired physical conditions and 1% to an unbalanced state of mind[297]. Based on data available for 9 Member States, the average share of fatalities attributed to

[293] https://www.rivm.nl/bibliotheek/rapporten/280001001.pdf
[294] https://etsc.eu/wp-content/uploads/PIN-Flash-40_Final.pdf
[295] La sécurité routière en France Bilan de l'accidentalité de l'année (2019)
[296] Ulykkesfaktorer in Vejdirektoratet (2020) Dødsulykker 2019 Årsrapport
[297] https://www.statistik.at/fileadmin/publications/Strassenverkehrsunfaelle-2021.pdf

driver's medical condition is estimated at 8%. This is used to derive the number of fatalities that have likely resulted from medically unfit drivers.

In addition, as explained in section 3 of Annex 4, it is assumed that some 8% of all self-assessments would result in a medical test, drawing on the practices regarding periodic screening for the UK298. Information from Belgium[299], shows similar order of magnitude with 10% of all drivers that were initially referred to a self-assessment being unfit to drive. To provide for a conservative estimate, it is assumed that around half of the number of road fatalities in which experienced drivers are involved are due to medical fitness. As explained above, only BG, CZ, DE, DK, EE, FR, HR, LU, LT, MT, SI and SK are affected by this measure.

For the vision test, a paper by ECOO300 shows that some 10% of all people are expected to have inadequate vision and as such should not be able to drive a vehicle without accompanying measures such as the requirement to wear glasses. Lack of vision is shown to increase the probability of being involved in an accident by 9% relative to people that have adequate vision[301]. For assessing the impacts of the measure, it has been conservatively assumed that the benefits would only occur during the first year of driving, after obtaining the licence.

PM6 is assumed to be implemented jointly with PMc1, PM1 and PM4. As the same fatality cannot be reduced twice, the impact is assessed for fatalities involving drivers that are not prevented by PMc1 and PM1 and PM4. The reduction in the number of fatalities at EU level is estimated at 11 in 2030 and 9 in 2050 relative to the baseline, while the number of serious injuries avoided at 105 in 2030 and 85 in 2050.

PM7: Rules on advanced medical screening

For PM7 a similar approach is used as for PM6. In relation to the shortening of the administrative validity to 5 years for drivers of the age of 65 years old or above, for assessing the impact of the measure on safety, it has been assumed that if the number of the medical checks in a Member State is reduced, the number of fatalities in which drivers of 65 to 70 years old are involved would increase by 0.8%. However, the impacts are different in PM7 relative to PM6 because the groups of Member States that reduce the number of medical checks is different, as explained in section 3 of Annex 4. Similar approach as in PM6 has been used for assessing the safety impacts of the medical screening at renewal of a driving licence. The impact is however estimated to be higher due to the fact that the self-assessment is conducted with a CP. The same approach as in PM6 has also been used for the vision test. However, in PM7 also FR adopt the vision test as explained in section 3 of Annex 4 and thus the impacts are larger.

Finally, PM7 is assumed to be implemented jointly with PMc1, PM1 and PM5. As the same fatality cannot be reduced twice, the impact is assessed for fatalities involving drivers that are not prevented by PMc1 and PM1 and PM5. The reduction in the number of fatalities at EU level is estimated at 35

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298 Source: https://www.nhs.uk/conditions/nhs-health-check/what-is-an-nhs-health-check-new/; In the UK, the assessment is performed by a professional. Under PM6, a self-assessment is assumed without the involvement of a GP. For this reason it is assumed that the procedure is less effective and thus some people that might be medically unfit would not be identified. Therefore, the figure for UK (16.1%) is scaled down by 50% to account for this.

299 https://www.vias.be/publications/Statistisch%20Rapport%202018%20-%20Rijvaardigheid%20en%20rijgeschiktheid/Statistisch_rapport_2018_-_Rijvaardigheid_en_rijgeschiktheid.pdf

300 https://www.ecoo.info/wp-content/uploads/2017/01/Visual-Standards-for-Driving-in-Europe-Consensus-Paper-January-2017....pdf

301 https://www.toi.no/getfile.php/135780-1176216112/Publikasjoner/T%C3%98I%20rapporter/2003/690-2003/690-2003-el.pdf

in 2030 and 29 in 2050 relative to the baseline, while the number of serious injuries avoided at 334 in 2030 and 277 in 2050.

A summary of the impacts of the measures on the number of fatalities and serious injuries is provided in Table 28.

Table 28: Change in the number of fatalities and serious injuries, by measure, relative to the baseline

	Difference to the baseline					
	PO-A		PO-B		PO-C	
	2030	2050	2030	2050	2030	2050
Total fatalities	-3	-3	-51	-44	-79	-68
PMc1	-10	-8	-10	-8	-10	-8
PMc11	7	5	7	5	7	5
PM1			-32	-29	-32	-29
PM4			-5	-3		
PM5					-9	-7
PM6			-11	-9		
PM7					-35	-29
Total serious injuries	-29	-28	-488	-419	-755	-649
PMc1	-96	-76	-96	-76	-96	-76
PMc11	67	48	67	48	67	48
PM1			-306	-277	-306	-277
PM4			-48	-29		
PM5					-86	-67
PM6			-105	-85		
PM7					-334	-277
Total fatalities and injuries avoided	-32	-31	-539	-463	-834	-717

Source: COWI, Ecorys and NTUA (2022), Impact assessment support study; Note: the negative sign denotes a decrease in the number of fatalities and serious injuries and the positive sign an increase relative to the baseline.

ANNEX 5: DISCARDED POLICY MEASURES

During the Impact Assessment process, a number of possible policy measures have been discussed with the key stakeholders and finally discarded, as explained below.

Policy measure	Relevant Driver	Short description	Reason for discarding
Rules on mandatory lifelong training and testing are introduced to ensure adequate skills and knowledge of drivers in the context of fast-changing technologies	PD1	Lifelong training or testing is made mandatory either at the renewal of the driving licences or at purchase of a new vehicle.	The consultation activities identified that benefits in road safety can be expected by a better use of advanced technologies such as ADAS, but the knowledge and skills required vary significantly from one equipment to another. In addition, authorities question the consequences for a driver not complying with these rules. Therefore, the measure has been discarded due to lack of effectiveness and political feasibility.
Amendments to the definitions of vehicle categories for motorcycles	PD1	Categories A1, A2 and A will include the combination of motorcycles with a trailer.	The consultation activities identified a demand expressed solely by the users. The current rules applicable in the EU[302] vary significantly from one Member State to another and are often linked to other traffic rules, such as speed limits. In addition, the absence of type approval rules for motorcycle trailers at EU level does not allow to identify the types of trailers to be authorised. The amendment would therefore go beyond the legal basis of the Directive.
Introduction of categories for agricultural vehicles	PD5	Article 4 of Directive 2006/126/EC will be amended to include a definition of one or several categories for agricultural vehicles, including minimum age.	The consultation activities identified a demand expressed solely by one stakeholder representing Agricultural, Rural and Forestry Contractors. The current rules applicable in the EU vary significantly from one Member State to another and are often linked also to professional matters, for example with different conditions applicable to agricultural and non-agricultural uses. The amendment would therefore go beyond the legal basis of the Directive.

[302] https://www.femamotorcycling.eu/consumer-information/riding-with-a-trailer/

Policy measure	Relevant Driver	Short description	Reason for discarding
Mutual recognition of training / theoretical test	PD1	Training started in a MS will be taken into account in other MS requiring a minimum training to be able to pass the driving test Theoretical test will be mutual recognised for the purpose of obtaining a driving licence after having transferred the normal residence to another EU MS.	The rules on training are defined at national level and are very heterogeneous, including regarding the training set-up and trainers. Exchanges with authorities have shown that establishing equivalences would be extremely complex in the absence of a common reference. Regarding theoretical test, certain aspects covered are the same everywhere in the EU. However, considering the differences between road traffic rules, the mutual recognition would create an additional risk on novice drivers which are the most affected by road accidents. The measure has been discarded because of limited feasibility and effectiveness.
Rules for Light Commercial Vehicles (LCV) drivers	PD1	A Union code will be introduced and required for LCV drivers subject to new rules on driving and resting time. Specific training and potentially assessment of medical fitness will be required to obtain the marking of the code.	While rules on driving and resting times will be introduced for some LCV drivers, consultation activities have not allowed to identify a demand to ensure the knowledge of these rules by the drivers concerned. In addition, the potential problems to be settled by such measures have not been fully confirmed by the support study. The implementation would result in significant administrative burden, considering that the verification would likely have to be conducted in a more frequent manner than the renewal of licences of category B. The measure has been discarded because of limited feasibility and effectiveness.
Changes to the requirements on minimum age	PD4	The minimum age(s) required for obtaining a driving licence are lowered.	The consultation activities have shown limited interest in reducing the minimum ages, in particular due to the resulting implications on road safety. Data from the US[303] show that the risk of motor vehicle crashes is higher among teens aged 16–19 than among any other age group. Road safety organisations also indicated to be against this measure during Workshop #1, and no Member State indicated to be in favour during the workshop. Thereby, the measure is discarded due to limited relevance and acceptance among stakeholders.

[303] https://www.cdc.gov/transportationsafety/teen_drivers/teendrivers_factsheet.html

Policy measure	Relevant Driver	Short description	Reason for discarding
Removal of code 70	PD5	Under this measure, an exchanged licence is no longer issued with a Code 70. This would mean that any person with an exchanged have this licence mutually recognised in all EU Member States.	Many Member States in Workshop #2 indicated to be against this measure because they would like to keep the possibility not to exchange driving licences obtained in exchange of a licence issued by a third country they consider not being at the level of the EU from a road safety point of view. Thereby, the measure is discarded due to limited political feasibility. However, code 70 will not be issued in case of third countries considered at the same level of road safety (see Retained measures, PM 14)
Removal of the graduated access scheme for A licences	PD1 PD4	The requirements to hold a driving licence of category A1 or A2 for at least two years before passing a test for the category A2 or A for young drivers would be removed.	Motorcyclist associations argue that the graduated access scheme for A licences is not proportionate. Road safety organisations are against the simplification/removal of the graduated access scheme. Furthermore, France indicated during the workshop that it experimented with a simplified approach to A-licences, but that this pilot was stopped due to a high number of fatalities. Thereby, removing the graduated access scheme is expected to deteriorate road safety, and the political feasibility of this measure might be problematic. Thereby, the measure is discarded due to potential increase in external costs (increase in fatalities) and limited political feasibility.
Specific rules to deal with language related issues	PD4	The measure would require Member States to provide theoretical tests in all EU languages or to allow an interpreter in order to overcome the language barrier.	Member States have mixed experiences with the use of interpreters. Some allow for interpreters or translate the theoretical tests in other languages. Others have negative experiences with interpreters as they might result in fraud (and thereby stopped allowing the use of interpreters). Due to the mixed appetite for the measure, political feasibility is expected to be problematic for the measure allowing interpreters. Some Member States already make the theoretical test available in other languages, but no Member States (to our knowledge) offers the theoretical test in all EU languages. Member States that also make the theoretical test available in other languages indicate that only a (very) small number of people make use of this. Translating all theoretical questions into 23 EU languages is associated with a large cost and the benefits are likely small. Thereby, the measure to have the tests in all EU languages is discarded due to limited effectiveness and efficiency.

Policy measure	Relevant Driver	Short description	Reason for discarding
Harmonise road traffic rules and applicable sanctions	PD2	In order to enable the mutual recognition of driving disqualifications, the road traffic rules, including threshold and consequences of offenses would be harmonised.	Although this measure might have significant positive impacts on road safety and the mutual recognition of sanctions, the political feasibility is likely absent. Also, the legal feasibility would highly likely be problematic, due to different legal regimes in MS and due to limited EU intervention in this area.
Introduce a harmonised system for penalty points in the Directive	PD2	Under this measure, the relation of penalty points to driving disqualifications is harmonised across the EU. This system would harmonise the existing penalty point mechanisms in Member States and specify the number of penalty points that an offender can receive (possibly within a certain time frame), before a driving disqualification is imposed.	The measure is unlikely because it is not legally feasible (incl. from subsidiarity point of view) – same as above.
Require novice drivers to attend a driver refresher course	PD 1	Novice drivers are required to attend a driver refresher course six to nine months after they have received their licence. The refresher course lasts about few hours and consists of theoretical and practical training.	The views with this system are mixed, with some arguing that the costs and efforts from novice drivers to attend the refresher course are disproportionate and others arguing that the benefit for road safety exist. Member States currently already have the possibility to require these refresher courses and some are using this possibility, but some Member States would consider this measure not to be proportionate. Therefore, the measure is discarded due to limited political feasibility/ proportionality.
Introduce standards to be complied with by driving schools and instructors	PD1	By establishing minimum standards for driving schools and instructors, it is expected that the quality of training will increase.	Most Member States have already established such standards which are adapted to national specificities. The views expressed in workshop #1 and at the committee on driving licences held in May 2022 have underlined business difficulties encountered by driving schools

Policy measure	Relevant Driver	Short description	Reason for discarding
			because of a shortage of instructors and COVID-19. European standards would consequently be low and result in marginal effects. Therefore, the measure is discarded due to limited political feasibility and effectiveness.
Introduced rules on the content of driver training	PD1	By definition the content of the training, it is expected that the quality of training will increase.	Most of the Member States have already established such rules which are aiming to prepare to the driving test, but which also are adapted to national specificities (e.g. environment such as icy roads and road traffic rules) and general objectives on road safety at national level. The views expressed in workshop #1 and at the committee on driving licences held in May 2022 have underlined very inhomogeneous approaches. The measure would therefore have either to provide a very large flexibility or to require changes to training schemes which are considered performant. Therefore, the measure is discarded due to limited proportionality, efficiency and effectiveness.
Introduce rules for former holders of EU driving licences residing in EU overseas territories	PD5	These drivers would be issued (at their request) a driving licence with a specific EU code. The driving licence would be valid only when presented with the driving licence issued by the overseas territory.	This measure would address problems reported by Denmark on former holders of driving licences issued by Denmark who are now residing in Greenland. The number of concerned persons seems very limited: a few hundred people travelling in the EU (abroad Denmark). Therefore, the measure is discarded due to limited proportionality and potential risk on road safety in case of driving disqualifications.

ANNEX 6: RETAINED POLICY MEASURES

This annex presents the policy measures that have been retained to be included in policy options. First, the measures common to all policy options are presented. The second table provides the policy measures additionally included in PO-B and/or PO-C.

Policy measures common to all policy options

Driver	Policy measure	Short description	Link to a specific objective
PD1	**PMc1**: Update of standards on skills and knowledge to be met for the first issuance of a driving licence.	The standards to be met for obtaining a driving licence will be updated. A driver hazard perception test will have to be conducted, including by use of simulators. Knowledge of risk factors related to micro mobility means and of safety of alternatively fuelled vehicles will be assessed. Knowledge and potentially skills related to advanced driving assistance systems and other automation aspects of the vehicle will be assessed.	**SO1**
	PMc2: Introduction of rules to remove restrictions associated to automatic gear transmission.	Drivers who passed their driving test with an automatic gear vehicles will be able to remove the associated restriction on their driving licences (code 78). To remove the restrictions, they will have to follow a certified training or to pass successfully a short practical test, potentially with simulators. The test and the training will be conducted on a vehicle with manual transmission and will focus on skills dependent on the type of vehicle's transmissions.	
	PMc3: Amendments to the definitions of vehicle categories for cars and vans (maximum mass).	Category B will include alternatively-fuelled vehicles of a maximum mass not exceeding 4,25t, without a trailer.	
PD2 PD4 PD5	**PMc4:** Improvement of RESPER for the purpose of enforcement	Requirements on RESPER will be introduced. They will specify the response time to be met when answering to requests and they will allow also to improve the data quality. Additional information will be exchanged, in particular in relation to driving disqualifications.	**SO1** **SO3**

Driver	Policy measure	Short description	Link to a specific objective
PD3	**PMc5:** Update of standards on physical and mental fitness to be met for the issuance of driving licences	Requirements related to diabetes will be updated taking into account the evolution of medical care for this disease (for example, the frequency of the physical fitness assessment will be reduced from every 5 years to every 10 years).	**SO2**
	PMc6: New rules on the use of technologies to mitigate medical unfitness	When a person does not meet the standards on physical and mental fitness, a driving licence may be issued to him or her with the obligation to use a technology that mitigates the unfitness to drive (e.g. alcohol interlock)	
	PMc7: Establishment of a knowledge management Platform for authorities regarding physical and mental fitness to drive	An expert group will be established and annual meetings will be organised to allow authorities to share information and best practices in relation physical and mental fitness to drive (e.g. screening, assessment)	
PD4 PD5	**PMc8:** Clarification of the concept of normal residence	The concept of normal residence will be developed to specify how the normal residence should be determined during the 6 first months of establishment in a new country, including certain special cases where two or more Member States consider they can be issuing authority.	**SO3**
PD5	**PMc9:** Introduction of the EU mobile driving licence	An EU digital driving licence will be introduced, based on ISO18013-5 and on eIDAS features. Mobile driving licences will be recognised from 2026 and will be issued by default from 2028.	
	PMc10: Introduction of a possible QR code on the physical licence in the areas reserved for microchip	It will be possible to print a QR code in the space reserved on physical driving licences for microchips. It will provide access to additional information, not displayed on the physical driving licence.	
	PMc11: Improvement and simplification of rules on administrative validity.	The 15 years long administrative validity of driving licences for A and B categories will be made mandatory and exclusive. MS will be able to issue driving licences with an administrative validity not exceeding that of the residence permit of the (foreign) holder[304].	

[304] In a similar but more effective manner than Regulation (EU) 2020/698 and Regulation (EU) 2021/567.

Driver	Policy measure	Short description	Link to a specific objective
	PMc12: Mutual recognition of optional equivalences – New equivalence applicable to small bus combined with a trailer	Optional equivalence will be mutually recognised. For that purpose, an EU code will be introduced for each of the optional equivalence of the Directive. A licence granted for categories D1 and CE shall be valid to drive vehicles in category D1E.	

Policy measures included in options PO-B and/or PO-C

Driver	Policy measure	Short description	Link to a specific objective
PD1 PD2	**PM1:** Rules on training and probation periods - Recommendation on lifelong training	Rules on accompanied driving for drivers who are between 17 and 18 years old after passing the driving test will be introduced for categories B and C. It will include a specific EU code and standards applicable to accompaniers. It will require to reduce for this specific case the minimum age from 18 to 17 years old to be professionally qualified (Directive (EU) 2022/2561) A probation period of a minimum of 2 years will be established for novice drivers. It will be subject to strict rules related to driving under influence (zero tolerance) and potentially additional rules and/or restrictions defined by each MS. A recommendation will be adopted for lifelong training, with the objective to maintain drivers' skills and knowledge on advanced technologies.	**SO1**
PD1	**PM2:** Amendments to the definition of the mopeds' category to include certain micro mobility means	The category AM will include all vehicles with a speed between a maximum speed of 25 and 45 km/h, including micro-mobility means. It will not cover vehicles with a maximum speed below 25 km/h	**SO1**
	PM3: Introduction of a new category for tractors - amendment to the definition of the small bus category	The mutual recognition of national licences for tractors will be introduced. The number of maximum passengers for vehicles of category D1 will be increased from 16 to 22.	

Driver	Policy measure	Short description	Link to a specific objective
PD2	**PM4:** Mutual recognition of driving disqualifications	Driving disqualifications resulting from specific offenses (excessive speed driving and driving under the influence of alcohol) will be mutually recognised.	**SO1**
	PM5: Rules on consequences of penalty points for non-residents - Rules on rehabilitation in case of a change of normal residence	Penalty points will be also applied to non-residents and driving disqualification resulting from penalty points system should be mutually recognised.	
PD3	**PM6:** Rules on simple medical screening	Non-binding guidelines will be established for assessing applicants' vision for group 1 drivers. Medical screening will be mandatory at renewal for group 1 drivers, based on a self-assessment triggering assessments by a general practitioner and/or a specialist if required. Administrative validity of driving licences of group 1 will be shortened to 5 years for drivers of the age of 70 years old or above to enable more frequent medical screening. An instrument will be established to prepare training material related to medical screening for general practitioners (in all EU languages).	**SO2**
	PM7: Rules on advanced medical screening	Applicants' vision will be checked by certified professionals for group 1 drivers. Medical screening will be mandatory at renewal for group 1 drivers, based on a self-assessment filled out with a general practitioner triggering specific assessments if required. Administrative validity of driving licences of group 1 will be shortened to 5 years for drivers of the age of 65 years old or above to enable more frequent medical screening. An instrument will be established to prepare training material related to medical screening for general practitioners (in all EU languages).	
PD4	**PM8**: Removal of the staging requirement to obtain a licence of category CE or DE	The requirement to hold a licence of category C or D to obtain a licence of category CE or DE will be removed	**SO3**

Driver	Policy measure	Short description	Link to a specific objective
	PM9: Flexibility for the first issuance of driving licences in case of restrictions related to languages	Applicants that are EU nationals shall be able to obtain their first driving licence of category B in their country of citizenship in the event their state of normal residence does not allow interpreters and the official language of their country of citizenship is not available for theoretical or practical test in their country of normal residence	
PD4 PD5	**PM10:** Mutual recognition of physical and mental assessment	Verifications that the standards on physical and mental fitness to drive are met will be mutually recognised by the Member States.	
PD5	**PM11:** New optional equivalence related to vehicles with limited maximum speed	The holder of a B1 licence aged 21 years old or less will be authorised to drive a vehicle whose maximum mass is 2 500 kg and maximum speed is physically limited to 45 km/h on the territory of his or her issuing state if that later has decided to implement this optional equivalence	
	PM12: Rules on the removal of code 70	The code 70 will be removed from the licence when the driver has been holding an EU licence for at least 5 years and has not committed serious road traffic offenses. Driving licences will be issued without a code 70 in the event of an exchange of foreign licences as concerns former holders of an EU driving licence for the categories obtained after passing tests in the EU	
	PM13: New optional equivalence related to bus without passengers	The holder of a driving licence of category C will be authorised to drive a bus without passengers on the territory of his or her issuing state if that later has decided to implement this optional equivalence.	
	PM14: Rules on the exchange of foreign driving licences.	Rules will be introduced establishing a legal basis for the exchange of driving licences issued by a third country whose licensing system guarantees a level of road safety equivalent to the one in the EU. The issued driving licences will not be marked with a code 70. MS will be able to continue to establish new framework under the current rules for the exchange of driving licences with countries whose level of road safety has not been assessed.	

ANNEX 7: VEHICLE CATEGORIES

This annex explains the various categories of vehicles specified by Article 4 of Directive 2006/126/EC. These categories are marked on the driving licences and refer to the type of vehicles that a person can drive when he or she holds a driving licence of the corresponding category.

Motorcycles, motor tricycles, light quadricycles and mopeds

Category	Type of vehicles
AM	Two-wheel vehicles or three-wheel vehicles with a maximum design speed of not more than 45 km/h, as defined in Article 1(2)(a) of Directive 2002/24/EC[305] of the European Parliament and of the Council of 18 March 2002 relating to the type-approval of two or three-wheel motor vehicles (excluding those with a maximum design speed under or equal to 25 km/h), light quadricycles as defined in Article 1(3)(a) of Directive 2002/24/EC
A1	motorcycles with a cylinder capacity not exceeding 125 cubic centimetres, of a power not exceeding 11 kW and with a power/weight ratio not exceeding 0,1 kW/kg, motor tricycles with a power not exceeding 15 kW,
A2	motorcycles of a power not exceeding 35 kW and with a power/weight ratio not exceeding 0,2 kW/kg and not derived from a vehicle of more than double its power,
A	motorcycles motor tricycles with a power exceeding 15 kW

Cars and vans

Category	Type of vehicles
B	motor vehicles with a maximum authorised mass not exceeding 3 500 kg and designed and constructed for the carriage of no more than eight passengers in addition to the driver; motor vehicles in this category may be combined with a trailer having a maximum auth-orised mass which does not exceed 750 kg.
B1	quadricycles, as defined in Article 1(3)(b) of Directive 2002/24/EC (optional)
BE	combination of vehicles consisting of a tractor vehicle in category B and a trailer or semi-trailer where the maximum authorised mass of the trailer or semi-trailer does not exceed 3 500 kg,

[305] Directive 2002/24/EC has been repealed by Regulation (EU) No 168/2013.

Trucks

Category	Type of vehicles
C	motor vehicles other than those in categories D1 or D, whose maximum authorised mass is over 3 500 kg and which are designed and constructed for the carriage of no more than eight passengers in addition to the driver; motor vehicles in this category may be combined with a trailer having a maximum authorised mass which does not exceed 750 kg;
CE	combinations of vehicles where the tractor vehicle is in category C and its trailer or semi-trailer has a maximum authorised mass of over 750 kg,
C1	motor vehicles other than those in categories D1 or D, the maximum authorised mass of which exceeds 3 500 kg, but does not exceed 7 500 kg, and which are designed and constructed for the carriage of no more than eight passengers in addition to the driver; motor vehicles in this category may be combined with a trailer having a maximum authorised mass not exceeding 750 kg;
C1E	combinations of vehicles where the tractor vehicle is in category C1 and its trailer or semi-trailer has a maximum authorised mass of over 750 kg provided that the authorised mass of the combination does not exceed 12 000 kg, combinations of vehicles where the tractor vehicle is in category B and its trailer or semi-trailer has an authorised mass of over 3 500 kg, provided that the authorised mass of the combination does not exceed 12 000 kg,

Buses

Category	Type of vehicles
D	motor vehicles designed and constructed for the carriage of more than eight passengers in addition to the driver; motor vehicles which may be driven with a category D licence may be combined with a trailer having a maximum authorised mass which does not exceed 750 kg;
DE	combinations of vehicles where the tractor vehicle is in category D and its trailer has a maximum authorised mass of over 750 kg,
D1	motor vehicles designed and constructed for the carriage of no more than 16 passengers in addition to the driver and with a maximum length not exceeding 8 m; motor vehicles in this category may be combined with a trailer having a maximum authorised mass not exceeding 750 kg;
D1E	combinations of vehicles where the tractor vehicle is in category D1 and its trailer has a maximum authorised mass of over 750 kg,

ANNEX 8: MINIMUM AGES

This annex explains the minimum ages specified by Article 4 of Directive 2006/126/EC. These ages are the minimum ages required to obtain a driving licence of a given category. Reference to flexibility indicates the possibility for a Member State to choose a different minimum age in an interval specified by the Directive.

1. MINIMUM AGE FOR MOPEDS, MOTORCYCLES, TRICYCLES, QUADRICYCLES, CARS AND VANS (DIRECTIVE 2006/126/EC)

Motorcycles, tricycles, light quadricycles and Mopeds

	Baseline
AM	16 years
A1	16 years
A2	18 years
A (tricycles)	21 years

For category AM, a flexibility on the minimum age (down to 14 years or up to 18 years) may be applied.

A (motorcycles)	baseline
Direct access	24 years
Graduated access	20 years (after 2 years of A2 experience)

For the graduated access, a flexibility on the minimum age may be applied.

	Flexibility #1	Flexibility #1
A1	17 years	18 years
A2	19 years	20 years
A (motorcycles)	21 years (after 2 years of A2 experience)	22 years (after 2 years of A2 experience)

Cars, heavy quadricycles and vans

	B1	B / BE
Baseline	16 years	18 years
Flexibility*	up to 18 years	down to 17 years

* Only within the territory of Member States applying the provision

2. Minimum age for drivers of trucks and buses

Trucks and buses without a professional qualification (Directive (EU) 2022/2561)

C1 / C1E	C / CE	D1 / D1E	D / DE
18 years	21 years	21 years	24 years

Trucks and buses with a professional qualification (Directive (EU) 2022/2561)

C / CE	D / DE	D / DE (accelerated qualification with restrictions)
18 years (standard qualification)	21 years (standard qualification) 23 years (accelerated qualification)	21 years (service route < 50km)

Minimum age for categories C1/C1E and D1/D1E are the same as above (18 and 21 years).

Optional flexibilities with a professional qualification (Directive (EU) 2022/2561)

D1 / D1E	D/DE	D / DE (standard qualification with restrictions)
18 years (standard qualification)	20 years (standard qualification)	18 years (without passengers) or (service route < 50km)

Only within the territory of Member States applying the provision

Standard qualification refers to a Certificate of Professional Competence as referred to in Article 6(1) of Directive (EU) 2022/2561.

Accelerated qualification refers to a Certificate of Professional Competence as referred to in Article 6(2) of Directive (EU) 2022/2561.

ANNEX 9: LINKS BETWEEN MAIN CONCLUSIONS OF THE EX-POST EVALUATION AND THE IMPACT ASSESSMENT

The following table summarises the links between the conclusions of the ex-post evaluation and the impact assessment of the Driving Licences Directive.

Main ex-post evaluation conclusions	Impact Assessment
Conclusions on relevance	
The current rules on driving skills and knowledge do not sufficiently reflect new technological solutions, such as advanced driver assistance systems, semi-automated and automated driving, as well as the uptake of micro-mobility solutions and low- and zero-emissions vehicles with automatic gear transmission.	The impact assessment further develops the specific objectives but the general objective (improving road safety and facilitating the free movement of people) remains valid.
Conclusions on effectiveness	
The effect of the Directive on road safety is considered as being positive but is assessed to be insufficient to meet the EU targets for 2030. In addition, there are still some provisions which, when implemented, may create obstacles to the free movement of persons.	Policy measures are defined to support the EU framework with new rules on training and probation periods, the mutual recognition of driving disqualifications and guidelines for establishing the normal residence.
Conclusions on efficiency	
Standardised validity periods, the requirement to renew driving licences and regular medical checks for professional drivers are likely to have increased both the administrative burden and the costs for citizens. Some stakeholders also claim that the system of progressive access to category A licences has led to higher costs and burdens for applicants. The Union model driving licence and RESPER do not appear to have led to higher costs for citizens; they have likely helped reduce administrative burden. Digital solutions, including the mobile driving licences have not been sufficiently explored, and RESPER could be used more to reduce the administrative burden.	Policy measures are defined to enable the simplification and reduction of the administrative burden, in particular in relation to digital transformation. Furthermore, the recognition of mobile driving licences is expected to improve efficiency, including when implementing administrative procedures.
Conclusions on coherence	
The Directive complements the cross-border enforcement Directive, but possible synergies in enforcement through a mutual recognition of driving disqualifications are not exploited. The Directive could also be better aligned with the EU type approval legislation for vehicles. With the digital transformation (already started with the use of RESPER), focus on data protection and the GDPR is needed.	The impact assessment identifies areas where improving coherence is required, including in terms of vehicles' definition and recognition of disqualifications.
Conclusions on EU Added Value	
Without the Directive, EU countries would likely have cooperated through bilateral agreements and through other means, which would most likely have resulted in more complex licensing systems and a higher administrative burden. In this respect, the main benefit of the Directive is the increased harmonisation of driving licence rules across the EU. However, EU action is still needed on some specific topics.	EU action continues to be needed to deliver on the policy objectives of the DL Directive, for instance by enabling the mutual recognition of mobile driving licences, by improving the use of RESPER and by clarifying the normal residence concept.

ANNEX 10: EFFECTS ON ROAD SAFETY – QUALITATIVE ASSESSMENT

This annex summarises hereafter the qualitative assessment of the expected effects of policy measures and options on road safety. This complements the quantitative analysis performed for measures with more significant impact, detailed in Annex 4.

Positive impact

In terms of positive impact, all policy options will contain measures on updated standards on skills and knowledge which applicants will have to meet for the first issuance of the driving licence (PMc1). Literature has shown that hazard perception test and training result in drivers avoiding 16% more hazards[306] and in a reduction around 10% of "non-low-speed public road crashes"[307]. The UK has introduced a hazard perception test which has been considered as potentially saving hundreds of lives every year[308]. In addition, the improvement of RESPER (PMc4), the introduction of a possible QR code (PMc10) and the introduction of the EU digital driving licence (PMc9) should allow to verify more efficiently the validity of a driving licence during a roadside check or an administrative procedure. It will result in a limited positive impact on road safety by improving the means to fight against fraud and consequently by reducing impunity. The rules on the use of technologies to mitigate medical unfitness (PMc6) should allow to maintain the driving rights for persons unfit to drive (for example, with an alcohol interlock). Consequently, it will provide a secure environment to these drivers that could have continued to drive without a driving licence with the current rules. The establishment of an information platform expert group on medical fitness to drive (PMc7) should enable more share of knowledge, lessons learnt and best practices on the assessment of the physical and mental fitness to drive between Member States authorities. It is expected to progressively improve the national systems in place. All policy options will also provide the clarification of the concept of normal residence (PMc8) which should help if a person may claim two or more normal residences. It will allow to identify drivers taking benefit of their personal situation to avoid the consequence of offenses. The resulting impact on impunity will have an indirect small effect on road safety.

The positive impact on road safety is however expected to be higher in PO-B and PO-C, given that they both introduce another set of measures with additional positive impact: the introduction of rules on training and probation period, with a probation period of a minimum of 2 years for novice drivers, and recommendation on lifelong learning (PM1). Accompanied driving after passing the driving test at 17 has shown a reduction of 22% of accidents in Germany[309] per kilometre driven by these drivers. The mutual recognition of driving disqualifications for offenses such as excessive speed driving and driving under the influence of alcohol (PM4) should also contribute to road safety, with additional expected effects resulting from rules on penalty points and rehabilitation (PM 5) in case of PO-C. In the public consultation, the mutual recognition of driving disqualifications has been recognised to have a positive impact on road safety regarding speeding (5,143 out of

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306 Vidotto, G., Bastianelli, A., Spoto, A., & Sergeys, F. (2011). Enhancing hazard avoidance in teen novice riders. Accident Analysis and Prevention, 43(1), 247–252

307 https://impact.ref.ac.uk/casestudies/CaseStudy.aspx?Id=37241

308 https://www.gov.uk/government/news/hazard-perception-test-wins-road-safety-award

309 BASt - Berichte der BASt - Summative Evaluation of "Accompanied Driving from Age 17"

7,532 or 68% respondents) and driving under the influence (6,224 out of 7,532 or 82% respondents)

Both PO-B and PO-C would also benefit from rules on medical screening and assessment (PM 6 and PM 7 respectively), bringing additional positive impact for the road safety. Minor but still positive impact for PO-C compared to other two options would have the introduction of micro mobility vehicles in the scope of category AM (PM2) requiring driving licence, which should reduce the number of fatalities involving such vehicles for speeds between 25 km/h and 45 km/h.

Neutral impact expected

The policy options also include measures which are not expected to have a negative impact on road safety, even if they may be perceived as potentially deteriorating the road safety. Such measure, included in all policy options, are the updated rules for vehicles with automatic gear transmission (PMc2). The removal of restrictions (code 78) is currently obtained by doing a full test on a vehicle with manual transmission. The new rules will allow the removal of this code following a certified training or a practical test, focusing on the difference between manual and automatic transmission and providing the same level of assurance of the capability of the driver to control a vehicle with a manual transmission as with the current rule. A similar rule is in place in Germany and has not shown an increase of accidents involving drivers previously subject to the code 78 restrictions. The update of the standards on physical and mental fitness (PMc5) is also expected to have a neutral impact on road safety. It envisages the reduction of the frequency of medical checks for drivers suffering diabetes mellitus which reflects the evolution of the health care regarding this medical issue since 1996. The mutual recognition of optional equivalence and the introduction of a new equivalence related to small buses and trailer (PMc12) should also have a negligible impact on road safety. Both measures are expected to cover a very limited number of drivers. The new equivalence already exists for bigger buses from the second Directive (applicable from 1994) which also includes the optional equivalences to be mutually recognised. The data available on road fatalities do not indicate any specific negative pattern regarding these rules.

The introduction of a new category for tractors and the change to the definition of category D1 (PM3): regarding small buses, reflect an evolution of the market offer. The dimension of these buses will remain unchanged (below 8 meters). Regarding tractors, while differences can be noticed in the national licensing systems, their use in a professional context in rural areas is not expected to be a source of increased number of accidents.

Additional measures brought about in PO-B and PO-C are also expected to have a neutral impact on road safety. This applies to the removal of the staging requirement (need to have the licence of category C or D to obtain a licence of category CE or DE under PM8) where the standards to be met at the driving test for categories CE or DE include the ones required for category C or D. In addition, the professional qualification (Directive (EU) 2022/2561) foresees a verification of the skills and knowledge of the driver regarding driving ability and road safety. The introduction of an optional equivalence allowing to drive a bus without passengers with a licence of category C (PM3) concerns extremely limited routes and the standards to be met at the driving tests for a bus are the same as the ones for a truck except for what concerns passengers.

Being included only in PO-C, the introduction of rules on the exchange of foreign driving licences (PM14) is not expected to have negative impacts, since the rules will only concern driving licences issued by third countries whose licensing system is similar to the EU one regarding road safety. Also included in PO-C, the rules on the removal of code 70 (PM12) require that the former holder of a foreign driving licence has a positive track record in term of road safety.

Marginal negative impact expected

All policy options contain two measures having a potentially negative impact on road safety, while bringing positive impacts for the other objectives of the initiative. It has not been possible to quantify them. The increase of the maximum mass for category B to 4.25t (PMc3) is expected to have a limited negative effect on road safety. While the increase of the mass is likely to result in an increase of fatalities and serious injuries for vulnerable road users, the effect will be partially mitigated by the scope of application of the measure limited to electric vehicles. On the other hand, the vehicles concerned will be the recent ones and will benefit from advanced technologies regarding road safety.

The harmonisation of the administrative validity to 15 years (PMc11) is expected to have a limited negative effect on road safety. It will reduce the frequency of medical check for MS which now apply an administrative validity of 10 years and request a medical check or screening at renewal[310].

While certain of the measures above may concerns the same driver, we have not been able to identify a negative impact on road safety resulting from the combined effects of each of the measures.

[310] AT, BE, CY, EL, ES, FI, HU, IE, IT, LV, NL, PL, PT, RO and SE (78% of group 1 licences)

ANNEX 11: EFFECTIVENESS OF THE POLICY OPTIONS

The following table summarises the expected effectiveness of each policy option, complementing the description in section 7.1.

Key expected impacts				
××	×	O	✓	✓✓
Strongly negative	*Negative*	*No or negligible impact*	*Positive*	*Strongly positive*
		PO-A	**PO-B**	**PO-C**
Specific objective 1: improve driving skills, knowledge and experience and reduce and punish dangerous behaviour				
Standards on skills, knowledge, training and probation periods to be met for the first issuance of a driving licence are harmonised		Positive impact on road safety, due to upgraded skills resulting in 106 avoided fatalities and serious injuries in 2030 and 84 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 2,388 relative to the baseline.	Strong positive impact on road safety, due to: - upgraded skills, resulting in 106 avoided fatalities and serious injuries in 2030 and 84 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 2,388. - probation periods and training implemented across the EU, helping avoid 338 fatalities and serious injuries in 2030 and 306 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 8,360 relative to the baseline.	Strong positive impact on road safety, due to: - upgraded skills, resulting in 106 avoided fatalities and serious injuries in 2030 and 84 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 2,388. - probation periods and training implemented across the EU, helping avoid 338 fatalities and serious injuries in 2030 and 306 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 8,360 relative to the baseline.

Dangerous behaviour abroad is more coherently punished	Positive impact is expected due to improvements to RESPER to improve data quality and specifying the response delays to requests and ensure a better fight against fraud and dangerous behaviour. This will support cooperation between issuing authorities which will also benefit from access to the system to check the validity of a digital driving licence. Additional albeit limited positive impact on road safety due to the introduction of the EU digital driving licence, which should allow to verify more efficiently the validity of a driving licence during a roadside check or an administrative procedure thereby improving the means to fight against fraud and consequently reducing impunity.	Strong positive impact on road safety due to the mutual recognition of driving disqualifications for severe road traffic offences, which will result in 53 less fatalities and serious injuries in 2030 and 32 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 947, relative to the baseline. Additional albeit limited positive impact on road safety due to the introduction of the EU digital driving licence, which should allow to verify more efficiently the validity of a driving licence during a roadside check or an administrative procedure thereby improving the means to fight against fraud and consequently reducing impunity.	Strong positive impact on road safety due to the mutual recognition of driving disqualifications for severe road traffic offences combined with rules on penalty points, which will result in 95 less fatalities and serious injuries in 2030 and 74 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 2,097, relative to the baseline. Additional albeit limited positive impact on road safety due to the introduction of the EU digital driving licence, which should allow to verify more efficiently the validity of a driving licence during a roadside check or an administrative procedure thereby improving the means to fight against fraud and consequently reducing impunity.

Specific objective 2: ensure adequate physical and mental fitness of drivers across the EU			
Drivers are regularly medically screened, depending on their health status and age	Positive impact of updated standards on skills and knowledge (such as perception tests, risk awareness, adaptation to new technologies), which applicants will have to meet for the first issuance of the driving licence	Strongly positive impact on the number of lives saved due to the simple medical screening, which will reduce fatalities and serious injuries by 116 in 2030 and 94 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 2,352, relative to the baseline. In addition, positive impact of updated standards on skills and knowledge (such as perception tests, risk awareness, adaptation to new technologies), which applicants will have to meet for the first issuance of the driving licence	Strongly positive impact on the number of lives saved due to the advanced medical screening, which will reduce fatalities and serious injuries by 369 in 2030 and 306 in 2050. Cumulatively, over 2025-2050, avoided fatalities and serious injuries amount to 8,428, relative to the baseline. In addition, positive impact of updated standards on skills and knowledge (such as perception tests, risk awareness, adaptation to new technologies), which applicants will have to meet for the first issuance of the driving licence

Specific objective 3: Remove inadequate or unnecessary barriers affecting applicants and holders of driving licences			
Mobile driving licence recognised across the EU	Strong positive impact on removing barriers to the free movement of people due to the introduction and use of mobile driving licences, which will be mutually recognised across the EU. This will bring hassle cost savings of EUR 1,697.2 million for citizens and EUR 587 million for businesses, expressed as present value over the 2025-2050 period (relative to the baseline).	Strong positive impact on removing barriers to the free movement of people due to the introduction and use of mobile driving licences, which will be mutually recognised across the EU. This will bring hassle cost savings of EUR 1,697.2 million for citizens and EUR 587 million for businesses, expressed as present value over the 2025-2050 period (relative to the baseline).	Strong positive impact on removing barriers to the free movement of people due to the introduction and use of mobile driving licences, which will be mutually recognised across the EU. This will bring hassle cost savings of EUR 1,697.2 million for citizens and EUR 587 million for businesses, expressed as present value over the 2025-2050 period (relative to the baseline).
Removal of cases where normal residence is an obstacle to exercise of maintain driving rights	Positive impact on fundamental rights and free movement of people is expected due to the clarification of the concept of normal residence, even if the expected impact should be small due to the low number of cases. But the consequences for individuals can be significant and can importantly impair the free movement of these road users. It is expected to have a positive impacts to the costs related to handling of complaints from citizens and in extreme cases, court rulings. They are also expected to result in a reduction of the hassle costs for citizens. Positive impacts for the applicants in cases of first issuance of driving licence category B, due to reduced barriers related to language requirements for driving licence tests. Some reduction in hassle costs for the citizens concerned is expected.	Positive impact on fundamental rights and free movement of people is expected due to the clarification of the concept of normal residence, even if the expected impact should be small due to the low number of cases. But the consequences for individuals can be significant and can importantly impair the free movement of these road users. It is expected to have a positive impacts to the costs related to handling of complaints from citizens and in extreme cases, court rulings. They are also expected to result in a reduction of the hassle costs for citizens. Positive impacts for the applicants in cases of first issuance of driving licence category B, due to reduced barriers related to language requirements for driving licence tests. Some reduction in hassle costs for the citizens concerned is expected.	Positive impact on fundamental rights and free movement of people is expected due to the clarification of the concept of normal residence, even if the expected impact should be small due to the low number of cases. But the consequences for individuals can be significant and can importantly impair the free movement of these road users. It is expected to have a positive impacts to the costs related to handling of complaints from citizens and in extreme cases, court rulings. They are also expected to result in a reduction of the hassle costs for citizens. Positive impacts for the applicants in cases of first issuance of driving licence category B, due to reduced barriers related to language requirements for driving licence tests. Some reduction in hassle costs for the citizens concerned is expected.