



ECFD and UPEI recommendations for the revision of Directive 2003/59/EC on the qualification requirements for drivers of road vehicles

Background

Directive 2003/59/EC on the qualification requirements for drivers of road vehicles (CPC Directive) is a central part of the EU's framework to improve road safety, as training of professional drivers contributes to reducing the incidence of human error as a cause of accidents. The Directive is currently being reviewed, with the objective to ensure it continues to guarantee safety provisions laid down in the EU common transport policy and the compliance with principles of the internal market. This paper, written jointly by ECFD and UPEI, sets out recommendations for the revision of the Directive. They are based on the extensive day-to-day experience of our members with road safety and tank truck driver qualification and training.

Our position on the European Commission's proposal

ECFD and UPEI welcome the European Commission's proposal to review and update the EU CPC Directive. The proposed text **reflects the key concerns of the professional tank drivers'** as highlighted throughout the evaluation process.

The **absence of an explicit authorization to account hours spent on the mandatory ADR training towards the CPC periodic training has been reported to the European Commission** during the Directive's evaluation. In its new proposal COM(2017)0047 published in January 2017, **the Commission clearly and specifically took note of this issue** identifying it as a shortcoming the "*ambiguity regarding the possibility to combine professional driver training with other training courses required under EU law (i.e. hazardous goods (ADR))*". In addition, the institution recognizes that CPC training content is not necessarily fully adapted to driver's needs.

In particular, **our members welcome the clarification provided by the Commission** on the possibility offered to Member States to combine CPC training with other trainings required under EU law. Explicit references to the additional trainings concerned, and notably for driving dangerous goods (ADR Directive 2008/68/EC), are necessary to provide certainty to Member States and ensure a common application and interpretation of the rules across the European Union.

More importantly, enabling the combination of two mandatory trainings will definitely improve CPC training content and satisfy more generally its road safety objective. It would tailor it to professional drivers' needs and make it relevant to each sector specificities, while limiting considerably the hitherto strain on tank truck drivers. This avoids duplication of training schemes and encourages professional drivers to learn subjects of direct relevance to their work, also in view of life-long learning. **Accounting completed specific trainings as one of the seven hour periods required under CPC periodic training** will also save and make profitable precious hours for businesses whose drivers are the main resource. This is definitely **a step in the right direction** and ECFD and UPEI strongly advise EU policy makers to **keep explicit references to ADR trainings in the final CPC directive** (especially in new point 2.1 of Annex I section 2, and new section 4 of Annex I).



However, based on our members' practical experience, it is clear that **tank truck drivers would largely benefit from combining more ADR training hours with CPC refresher courses** than the currently proposed single period of seven hours. Our two organizations would thus encourage policy makers to **extend this possibility to two periods of seven hours**. Given the hazardousness of the fuel they transport and deliver in case of accident or spill, priority should logically be given to adequate training on proper and safe management of such dangerous goods. In that respect, the compulsory ADR training does not lessen the directive's main objective of strengthened road safety, quite the opposite. In addition, two seven-hour periods will be more appropriate to keep pace with ADR legislation new developments, occurring every two years.

One should indeed keep in mind that initial and periodic training obligations also impose economic burdens, particularly on SMEs, which dominate the heating oil delivery business. Acknowledging the complementarity of EU trainings brings great relief to these small and micro-businesses whose financial capabilities are not unlimited.

Summary

- **We welcome the clarification** given to Member States regarding the possibility of combining specific EU trainings with CPC training
- We encourage legislators to **keep explicit references to ADR trainings (required under Directive 2008/68/EC) in Annex I** of the final revised directive
- We call for **at least two seven-hour periods of ADR training to be counted as part as CPC training**, contributing to better training relevance and increased road safety

The ECFD represents the interests of 10,000 distributors of petroleum products, including domestic heating oil, kerosene, petrol, diesel, gasoil and liquefied petroleum gases (butane, propane, LPG). Its members are essentially family-owned SMEs who supply from the refineries, terminals and their own storage directly to their customers' tanks. Members include the Austrian Association of fuel and petroleum distributors (WKO), the Belgian Federation of Fuel Suppliers (BRAFCO), Bundesverband mittelständischer Mineralölunternehmen e.V. (UNITI), the French Fédération Française des Combustibles et Carburants (FF3C), and the UK Federation of Petroleum Suppliers (FPS).

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UPEI represents European importers and wholesale/retail distributors of refined petroleum products and their alternatives, supplying Europe's customers, independently of the major fuel producers. It was created in 1962 with the aim of ensuring a level playing field for the supply of energy on the European market and safeguarding a competitive approach. The organisation brings together national associations and suppliers across Europe.

Today UPEI also acts as an informed and responsible partner to Europe's decision-makers on the risks and opportunities involved in the transition to a low carbon economy.

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