



## Draft Case Study

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### Kurze Zusammenfassung:

Dieser Artikel diskutiert die Auswirkungen eines von der EU eingeführten einheitlichen Aus- und Weiterbildungssystems anhand der Erfahrungen, die mit der Richtlinie 2003/59/EG über die Grundqualifikation und Weiterbildung von BerufskraftfahrerInnen gemacht wurden. Die Richtlinie sollte zur Verbesserung der Straßensicherheit beitragen und einem FahrerInnenmangel, welcher sich in vielen europäischen Ländern zunehmend abzeichnet, entgegenwirken. Die Auswirkungen der Richtlinie wurden im Zuge des ProfDRV-Projekts genauer untersucht, dieser Artikel basiert auf den Projektergebnissen.

Im ersten Teil des Artikels werden Instrumente zur Vereinheitlichung/besseren Vergleichbarkeit europäischer (Berufs-)Bildungspolitik in den Mitgliedsstaaten der europäischen Union diskutiert: Zum Einen wird hier auf den generellen Ablauf bei der Entwicklung und Umsetzung von Richtlinien eingegangen und zum Anderen werden relevante Richtlinien und Empfehlungen der Europäischen Kommission reflektiert. Im Rahmen des ProfDRV-Projekts wurde die Umsetzung der Richtlinie 2003/59/EG in sieben europäischen Ländern untersucht (Deutschland, Großbritannien, Italien, Niederlande, Österreich, Spanien und Ungarn). Die Projektergebnisse werden im vorliegenden Artikel anhand einer SWOT-Analyse analysiert und diskutiert. Aufbauend auf diesen Erkenntnissen werden Schlussfolgerungen und Empfehlungen für die Weiterentwicklung der Richtlinie 2003/59/EG sowie die Entwicklung neuer Richtlinien, die auf die Einführung eines EU-weit einheitlichen Aus- und Weiterbildungssystems abzielen, beschrieben.

### Short summary:

This Case Study discusses the implications of an EU-introduced common VET-scheme considering the experiences made with directive 2003/59/EC on the initial qualification and periodic training of professional drivers. The directive aimed at improving road safety and should contribute to combat the driver shortage which is a common phenomenon in Europe. The impact of the directive was further investigated in the course of the ProfDRV-project, this article is based on the results.

It discusses instruments for harmonising educational policies within the Member States of the European Union by reflecting the development and implementation of directives in the EU in general and by reflecting other relevant directives and recommendations. In the Prof-DRV-project the implementation of directive 2003/59 has been investigated in 7 different European countries. The project findings are analysed and discussed. Based on these findings conclusions and recommendations for the further development of directive 2003/59 and the development of new directives that aim at introducing EU-common VET-schemes are drawn.

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## (1) Introduction

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The road freight and passenger transport sector provides jobs for more than 4.5 million EU-citizens and already since 1976 (Council Directive 76/914/EEC) professional driver training is considered to be a matter of European interest. During the past decades qualification requirements changed and increased fundamentally for professional drivers because of changes in work organisation, new technical standards, changing legal regulations, market requirements and work environments as well as a fast internationalisation of the transport market. These developments contradict with the rather low level of professional qualification and a missing "learning" culture in the branch, which characterises this occupation nearly all over Europe and leads, together with a mostly negative image of the sector, already today to an alarming shortage of qualified drivers who possess the qualifications required by employers. Because the qualification of professional drivers is considered to be an important factor regarding road safety with high relevance for all EU member states DG Energy and Transport introduced directive 2003/59/EC that regulates common basic and continuous training for professional drivers.

The Leonardo da Vinci-project "Professional Driving – more than just driving!: Qualification requirements and vocational training for professional drivers in Europe" investigated vocational training schemes for this occupation in the countries examined from a Vocational Education and Training (VET) and Lifelong Learning (LLL) perspective, further a core job profile for professional drivers is defined and European educational standards for initial and periodic VET for drivers that are compatible with EQF are drafted.

This article draws conclusions from the project findings and develops recommendations for the further development of directive 2003/59 and on sheds light on what to consider when introducing an EU-common VET-scheme. The first section of the article 'European Instruments for harmonising educational policies within the Member States' is dealing with the development and implementation of directives in the European Union in general and with directives and recommendations in the field of (vocational) education and training relevant for this case study in particular. Further the wider embeddedness of such directives and recommendations in the wider European vocational education policy is discussed. In the next section the implementation approaches identified in the 7 investigated countries (Austria, Germany, Hungary, Italy, Netherlands, Spain and the United Kingdom) are reflected and four types of implementation approaches are identified. The core of the next section builds a SWOT-analysis of the implementation of directive 2003/59. On the basis of this the thresholds and chances of the directive are discussed before conclusions are drawn on what to consider when introducing European-wide common VET-schemes.

## (2) European Instruments for harmonising educational policies within the Member States

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The European Union has several instruments for harmonising educational policies within the Member States with the aim to bring national laws of the Member States into line with one another. Harmonisation<sup>1</sup> in this regard means to make sure that the rules laid down by the different EU countries impose similar obligations on citizens of all those countries and that they impose certain minimum obligations in each country. In this section the development and implementation of directives in the EU as one of these instruments and several directives and recommendations that aim at harmonising educational policies are discussed.

### (2.1) Development and implementation of Directives in the European Union

The European secondary legislation comprises the binding legal instruments (regulations, directives and decisions) and the non-binding instruments (resolutions and opinions) provided in the European Treaty on

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<sup>1</sup> Cf. [http://europa.eu/abc/eurojargon/index\\_en.htm](http://europa.eu/abc/eurojargon/index_en.htm) (27.01.2012).

Functioning of EU States (EUR-Lex<sup>2</sup>). In Article 288 of the Treaty, which builds the European Union's constitutional basis, the EU constitutes that "to exercise the Union's competences, the institutions shall adopt regulations, directives, decisions, recommendations and opinions" (Official Journal of the European Union C83, p. 171-172). In short the differences of these instruments are the following:

- A regulation is general and directly applicable in all Member States and it is binding in its entirety.
- A directive is binding, as to the result to be achieved, upon each Member State to which it is addressed, but it leaves the choice of forms and methods to the national authorities.
- A decision is binding in its entirety. A decision which specifies those to whom it is addressed is binding only to them.
- Recommendations and opinions have no binding force (ibid.).

Referring to these definitions the main aim of directives is to harmonise national legislations and to enhance the comparability between the legislations of European Member States. Since directives are flexible instruments it is up to the Member States addressed by a directive, how to implement and anchor the European policy defined in the respective directive. When a new directive is developed, a draft is prepared by the Commission after consulting relevant stakeholders at national and European level in order to guarantee the practical relevance of the directive to be developed.

After finalising a draft directive the Council of Ministers, the Commission and the European Parliament are launching a public consultation period, therefore a draft of the directive is published and public is invited to discuss its contents. These consultation periods should not be less than eight weeks, commencing when papers have been delivered (cf. Eurim Briefing No 26, May 1999). After the public consultation the directive is, if necessary reviewed and adapted, and is then presented to the Parliament and the Council for approval or rejection. When the directive is adopted the Member States have to issue national implementation measures and have to transpose the directive into national law until a certain deadline set out in the directive (cf. Europa – Summaries of EU Legislation).

## (2.2) Directives and Recommendations relevant for this Case Study

Since the Treaty on Functioning of EU Member States went into force several European Directives and Recommendations have been passed. Especially of concern are here those directives and recommendations that aimed at standardising and harmonising specific qualifications and/or training programmes within the European Union. With directive 2003/59 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers the European Commission aimed to enhance and guarantee the quality of professional drivers. Before the establishment of directive 2003/59 only the Netherlands and France have set additional requirements for professional drivers besides the driving license (Ministry of Transport, Public Health and Water management 2010). In 2005 the European Commission established directive 2005/36 on the recognition of regulated professional qualifications, although this directive aims on professional groups, different from professional drivers, it also has the objective to enhance transparency, comparability and the mutual recognition of professional qualifications in Europe. With the establishment of the European Qualification Framework which aims at enhancing the comparability, transferability and recognition of qualifications and competences within the European Union in 2008 and the recommendation on the establishment of a European Credit System for Vocational Education and Training (ECVET) in 2009 the European Union has set important steps to enhance the comparability and mutual recognition of qualifications within the EU.

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<sup>2</sup> Cf. [http://eur-lex.europa.eu/en/droit\\_communaire/droit\\_communaire.htm#1.3](http://eur-lex.europa.eu/en/droit_communaire/droit_communaire.htm#1.3) (05.01.2012).

First steps for harmonising road transport in Europe were set in 1976 when the **Council directive 76/916/EEC** on the minimum level of training for road transport drivers was established. In 1985 the European Union issued **Council regulation No 3820/85** on the harmonization of certain social legislation relating to road transport. Regulating amongst other issues the minimum age of drivers in the European Union, the maximum driving period as well as break and resting periods. And finally **directive 91/439/EEC** and its successors on driving licences specifying the European Driving License and regulating driving licenses of all categories within the European Union was introduced. **Directive 2003/59** on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers amended Council regulation No 3820/85 and Council directive 91/439/EEC and repealed directive 76/916/EEC (Directive 2003/59/EC, p. 1). The assumption behind developing Directive 2003/59 was that a minimum standard for drivers training in Europe will increase road safety and the safety of the driver in general.

*"More particularly, the obligation to hold an initial qualification and to undergo periodic training is intended to improve road safety and the safety of the driver, including during operations carried out by the driver while the vehicle is stopped. Furthermore, the modern nature of the profession of driver should arouse young people's interest in the profession, contributing to the recruitment of new drivers at a time of shortage" (Directive 2003/59/EC, (5), p.2).*

Although directives in the freight transport sector might have an indirect impact on reducing the shortage of qualified personnel, it is not easy to assess whether those measures have an impact on reducing the driver shortage, since directives also might lead to an increase in both the demand and supply side. It can be assumed that measures for solving the problem of shortage of qualified drivers "should follow a holistic, coordinated and targeted approach directed at both the demand and supply side, with coherent and coordinated effort at all levels - European, national, local - involving different actors and stakeholders (social partners, transport and education policy-makers)".<sup>3</sup>

**Directive 2005/36** on the mutual recognition of Professional Qualifications, made provisions whereby professionals qualified in one (home) Member State can seek professional recognition of their qualifications in another (host) Member State for the purpose of practising their profession in that host Member State. This directive applies only where the profession is regulated in the host Member State i.e. where the practice of the profession is confined by law, regulation or administrative procedure to persons who hold specific qualifications or registration/recognition from a specific competent authority or professional body (Department of Education and Skills). In June 2011 the European Commission has released a Green Paper for revising the Directive on the Recognition of Professional Qualifications; this formal consultation process has led to a proposal for modernising Directive 2005/36/EC which was adopted by the European Commission in December 2011.<sup>4</sup>

In 2008 the European Parliament established the recommendation on establishment of a **European Qualification Framework (EQF)**. It expresses that the development and recognition of citizens' knowledge, skills and competence are crucial for the development of individuals, competitiveness, employment and social cohesion in the Community. Such development and recognition should facilitate transnational mobility for workers and learners and contribute to meet the requirements of supply and demand in the European labour market. Access to and participation in lifelong learning for all, including disadvantaged people, and the use of qualifications should therefore be promoted and improved at national and Community level (Recommendation of the European Parliament and of the Council on the establishment of the European Qualifications Framework for lifelong learning).

<sup>3</sup> Directorate-General for Internal Policies. Policy Department B: Structural and Cohesion Policies, p. 101.

<sup>4</sup> Cf. <http://www.efpa.eu/news/proposal-for-modernising-the-professional-qualifications-directive> (20.06.2012).

With the recommendation on the establishment of a **European Credit System for Vocational Education and Training (ECVET)** in 2009 the European Commission tried to invent a system to encourage vocational mobility of both trainees and professionals.

All these directives, regulations and recommendations reflect the wider political strategy the European Union followed at least since the last decade:

- In the Lisbon Strategy (2000) the European Union has committed to become the “most competitive and dynamic knowledge-based economy in the world”, capable of sustainable economic growth with more and better jobs and greater social cohesion (Lisbon Strategy<sup>5</sup>). Therefore the development and enhancement of high quality vocational education and training was a crucial and integral part of this strategy.
- With the Copenhagen declaration (2002) the European Commission established the European dimension of vocational education and training including the mutual recognition of qualifications and competences.
- The Maastricht communiqué (2004) was built upon the Copenhagen declaration and established action plans at national level to increase investment in VET and to increase flexibility of VET systems, to better react on labour market needs. These goals also were confirmed in the
- Helsinki communiqué (2006) when the European Commission decided to draw attention on initial vocational education and training in order to reduce youth unemployment rates in European Member States.
- The Bruges communiqué (2010) states the view that national VET systems need to be connected to the wider world in order to remain up-to-date and competitive.

Especially when concerning that the road freight transport sector represents 47% of the whole freight transport sector (sea: 41%; rail transport: 8%; river transport: 4%<sup>6</sup>) in Europe and contributes with 7% to the European GDP it becomes obvious that a better quality, enhanced mobility and a better image of professional drivers are important issues for the European Union. This is even more important when reflecting a Manpower study from 2012 which rank drivers globally on position 7 out of 10 jobs employers have difficulties to fill (the shortage increased compared with the Manpower Talent Shortage Survey 2010, where drivers have been on position 9). Therefore the directive 2003/59 cannot be seen isolated from this wider political strategy of the European Union.

### **(3) Implementation of the EU Directive 2003/59 in the investigated Countries**

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Since directives are very flexible instruments and Member states just have to achieve a particular result, without definition of how to achieve that result, there are very different approaches for implementing directive 2003/59 in the investigated countries. In the course of the ProfDRV-project Country Case Studies based on desk research and expert interviews with relevant stakeholders in the countries Austria, Germany, Hungary, Italy, Netherlands, Spain and the United Kingdom were developed. Based on these case studies the implementation approaches used by the investigated countries became visible.

In **Austria** directive 2003/59/EC was legally anchored in 2006 with the Federal Law Gazette BGBl I Nr. 153/2006; detailed provisions for implementing Directive 2003/59 were issued in 2008 by the Federal Ministry for Transport, Innovation and Technology with the Federal Law Gazette BGBl II Nr. 139/2008. Although the Federal Ministry is responsible for introducing Directive 2003/59 in Austria, the nine provinces are in charge for the implementation.

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<sup>5</sup> Cf. <http://www.bka.gv.at/site/4913/default.aspx> (04.01.2012).

<sup>6</sup> Romanian Association for international Road Transport. Online: [http://crib.mae.ro/upload/docs/6095\\_artri\\_art\\_sec.pdf](http://crib.mae.ro/upload/docs/6095_artri_art_sec.pdf) (04.01.2012).

Austria has chosen the test-only option for the initial qualification and all truck drivers who received their license after 9 September 2009 have to complete the initial qualification. Those drivers with a license issued before 9 September have to participate in periodic training. The three-year apprenticeship training in professional driving exists in parallel, but those passing the final apprenticeship exam also receive the initial qualification for the Certificate of Professional Driving (CPC), marked with Code 95 in the driving license.

**Germany** has implemented the directive into German law with the Professional driver qualification law (BKrFQG) in 2006. The BKrFQG is considered as part of traffic and driving license law in Germany and is administered at regional level by the chambers of commerce in terms of initial qualification / training and by the ministries of traffic for periodic training. Germany has chosen the test-only and the training (140 hours) and test options. The formal public initial vocational education and training scheme to become a professional driver exists in parallel, but those passing through this system obtain together with their skilled-worker-certificate the driver CPC as required by the directive.

In **Hungary** a system of initial qualification and periodic training for professional drivers already existed before the directive. By order of the Ministry of Transport, the National Transport Authority (NKH) is responsible for implementing the directive in Hungary. Since Hungary already possessed a system of initial qualification and periodic training it was possible to ensure a smooth transfer from the already existing system into the new system by keeping the given best-practices of the past and building-in the request coming along with the directive. Hungary has chosen the test-only option, although the NKH recommends a training programme of 5 days for the CPC, just as it was before.

The competent authority responsible for the implementation of the directive in **Italy** is the Government and its Ministry of Transport. The implementation of the directive led to a new professional certificate in Italy named "Carta di Qualificazione del Conducente" (CQC). In terms of national qualification, CQC is now an essential requirement to work as a professional driver. Italy has chosen the training and test options with 140 or 280 hours of training to receive the initial qualification; after training and test the CQC is issued. Before the implementation of the directive Italy had no vocational education and training for professional drivers besides the driving license.

In the **Netherlands** a compulsory training for road transport drivers was introduced in 1975 in order to improve driver quality and driver skills. As a result each truck driver operating a truck with a total laden weight over 7.5 tonnes must hold a CPC, a certificate of professional competence. For the implementation of the directive the Ministry of Transport, Public Works and Water Management is responsible. The measures of the directive were integrated in the existing system and the directive was legally implemented with the Regeling Rijbewijzen (Driving License regulation). The Netherlands have chosen the test-only option for the initial qualification which is issued with Code 95 in the driving license.

**Spain** legally anchored the directive in national law with the Royal Decree 1032/2007. Before Spain had a three-folded system for achieving the driving licenses: C/C1 as a first step, C1+E and C+E licence in a second step and the ADR-certification in a third step. After completing the first step it was also possible to advance directly to step 3. The implementation of the directive and its initial qualification has led to a new certificate in Spain the "Certificado de Aptitud profesional", to be obtained after training and test options with 140 or 280 hours of training. Through the implementation of the directive a structured training system for drivers was implemented, although it is not completely integrated in the general Spanish professional training system and the National Qualifications Framework. In April 2012 a new professional title "Driving Vehicle Road Transport" was established with the Royal Decree 55/2012, which is a training programme on intermediate level. The training programme comprises 2000 hours, is part of the professional family "Transport and Vehicle Maintenance" and is in level 3 of the Spanish "International Standard Classification of Education" ("Clasificación Internacional Normalizada de la Educación").<sup>7</sup>

<sup>7</sup> BOLETÍN OFICIAL DEL ESTADO, Miércoles 18 de abril de 2012, Ministro de Educación, Cultura y Deporte.

In the **United Kingdom** before the directive professional drivers have been subject to training during their initial driving test and subsequently at their employers' discretion only. The government Department for Transport has set-up an official body (JAUPT) responsible for managing and accreditation of periodic training standards. Since the initial qualification is to be obtained through the test-only option in the course of vocational driving licence test, the DSA (Driving Standards Agency) is responsible for initial qualification. In the UK there is a slight cross-over between periodic training and the National Vocational Qualifications, although this is not considered as ideal.

For more detailed information on the investigated cases see also the country case studies developed in the course of the project. On the basis of our analysis we can distinguish between four approaches for implementing the directive.

- **Best possible integration of the directive in the existing system:** An already existing IVET scheme is adapted to the directives requirements. This was especially the case in the Netherlands where there already existed a system of compulsory training for professional drivers beside the driving license. Therefore the Netherlands have chosen to implement the directive by maintaining the existing procedures and adopting them with the new requirements set out in the directive.
- **Directive opens a parallel system to the already existing VET system:** There has been an IVET scheme for professional drivers before and the directive opens a new system, but this new system is not connected with the previous one. This is especially the case for Hungary and Spain where there already existed an IVET-scheme for professional drivers before the implementation of the directive.
- **Combination of both previous types:** There has been an IVET scheme for professional drivers before. The directive opens a new system, but this new system is in addition integrated in the previous system that runs in parallel to the new system. This is the case for Austria and Germany where beside the driving license also the three-year apprenticeship training to become a professional driver exist. In both countries the final apprenticeship exam (skilled-workers-certificate) is recognised as initial qualification as foreseen in the CPC. The difference to the previously mentioned systems is that only the initial qualification for CPC is integrated in the apprenticeship training and that the periodic training runs in parallel to the existing system.
- **Directive lead to the development of a new system:** There has been no IVET scheme for professional drivers before and a new scheme is established for the directive. This is the case for Italy and the UK where besides the driving license there existed no specific training programmes for drivers apart from some isolated training courses (e.g. ADR).

This shows that there are very different approaches in the investigated countries how to deal with the requirements defined in the directive. Hence it also shows weaknesses and strengths of the different approaches in place. In the following section the strengths and weaknesses of the directive are discussed more in detail.

#### (4) Directive 2003/59/EC – SWOT-analyses of the implementation

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There is little research available on how effective directives are and what effects are conceivable. With the implementation of directive 2003/59 it is possible to keep records of strategies, effects and consequences from this attempt to introduce an EU-wide common VET scheme. One way of analysing and evaluating this attempt is to conduct a SWOT-analyses (strengths, weaknesses, opportunities and threats).

The first element of the SWOT-analyses are the strengths of the directive, what works well from both the view of relevant stakeholders, policy makers, training providers and the view of drivers to whom the directive is addressed. Leading questions are 'what are the advantages of the directive', 'what do stakeholders perceive as strengths', 'what factors support the use of a directive'? In a next step the weaknesses of directive 2003/59 are investigated;

here the leading questions are 'what does not work well', 'what could be improved', 'what should be avoided', 'what do stakeholders perceive as weakness'? From the investigation of strengths and weaknesses the analysis proceeds identifying the opportunities, which includes any favourable condition that could improve directive 2003/59. When analysing the opportunities it is useful to consider the strengths and ask whether these open up any opportunities? Other questions to be addressed 'are there any changes in policy related to vocational education and training', 'are there changes in social patterns, occupational profiles'? The final element of the SWOT-analysis is the identification of threats<sup>8</sup>. It has to be considered that a strength could at the same time mean a weakness viewed from a different perspective and that each weakness could at the same time represent an opportunity. Leading questions to identify the threats are 'what obstacles are occurring', 'are quality standards / job profiles changing', 'are there any weaknesses that seriously threaten the directive'? <sup>9</sup>

In the following table the general strengths, weaknesses, opportunities and threats identified in the implementation of directive 2003/59 in the investigated countries are listed. These strengths, weaknesses, opportunities and threats can be identified on macro level (European, national and regional level), meso level (employers, training providers, companies etc.) as well as on micro level (drivers). The SWOT-analysis is based on several interviews with relevant stakeholders and case studies derived from them. This list is not exhaustive and can be continuously expanded.

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<sup>8</sup> For external views this could be enriched by a PEST-analysis (Political, Economic, Socio-cultural and Technological environment).

<sup>9</sup> Cf. [http://www.mindtools.com/pages/article/newTMC\\_05.htm](http://www.mindtools.com/pages/article/newTMC_05.htm) (05.01.2012).

Strengths	Weaknesses
<p>Macro Level</p> <ul style="list-style-type: none"> <li>Addressing and aligning differences in vocational education and training programmes / requirements in EU Member States</li> <li>Harmonising educational policies for drivers within the European Union</li> <li>Consultation processes on national and European level</li> <li>Room for interpretation; measures of directive can be adopted to national contexts</li> <li>Directive introduced a system of training for drivers</li> </ul> <p>Meso Level</p> <ul style="list-style-type: none"> <li>Consultation processes during implementation: participation of relevant stakeholders, experts, ministries of Transport, chambers of commerce, unions etc. to meet the needs of the sector branch</li> <li>Separation of training and examination in the test only option can improve the quality of training providers as they are not checking their own students</li> <li>Employers know what a driver that has the CPC is able to do, also if the driver has not completed CPC in the respective country</li> <li>Increasing number of training providers offering training courses for professional drivers</li> </ul> <p>Micro level</p> <ul style="list-style-type: none"> <li>Developing and setting-up a minimum standard for driver training</li> <li>Improving the image of drivers<sup>10</sup></li> <li>Increasing number of drivers following courses</li> <li>Consideration soft skills (communication or interpersonal skills)<sup>11</sup>.</li> </ul>	<p>Macro level</p> <ul style="list-style-type: none"> <li>Character of a directive leads to different modes of implementation and a general lack of comparability</li> <li>At national level: different responsible authorities (national governments, provincial governments); comparability often not even within one country</li> <li>At government level: Different responsible authorities (Ministry of Transport or Ministry of Education or share of responsibilities / conflict of responsibilities)</li> <li>Different training measures even within one country (federalism)</li> <li>The directive does not consider already existing measures in place (e.g. apprenticeship, VET programmes)</li> <li>Significant differences in the application of the directive among the European countries</li> <li>Different deadlines for the directives' implementation in the countries</li> <li>driving licences issued before a certain date have been automatically converted in CPCs without completing initial qualification</li> <li>CPC-qualification cannot be aligned to National, Sectoral and European Qualification Frameworks nor used for ECVET mobility, because of missing learning-outcome orientation</li> <li>Directive does up-to-now not lead to more comparability of drivers training within the EU</li> <li>For addressing road safety and drivers' shortage the directive can just be a starting point</li> <li>Directive replaced training measures that worked well in some countries (now just requirements of directive)</li> <li>Expected training hold-up, until the very end of deadlines</li> <li>Directive is not able to combat the missing learning culture in the sector</li> </ul> <p>Meso level</p> <ul style="list-style-type: none"> <li>Directive does often not meet needs of employers</li> <li>Intended objectives cannot be approached with a top-down-approach such as the directive</li> <li>Not enough participation of relevant stakeholders when developing and implementing the directive</li> <li>Test-only option does not include training, this is a kind of status quo (driving license) in some investigated countries</li> <li>Periodic training is mostly conducted theoretical (cost savings) and without any test</li> <li>Current training is not the best option to achieve more professionalization and it is not adjusted to the real needs of the professional drivers</li> <li>No funds available for training providers to cover expenses necessary to implement training courses as well as for trainees to participate in the training measure</li> </ul>

<sup>10</sup> With the measures set in the directive, drivers receive a certain level of vocational education and training, which could lead to a better image of drivers.

<sup>11</sup> The directive refers to these skills with the "ability to adopt behavior to help enhance the image of the company" (See Directive 2003/59/EC).

	<p>Micro level</p> <ul style="list-style-type: none"> <li>• The CPC is not capable for implementing the job as driver competently</li> <li>• Up-to now measures of the directive have no impact on geographical mobility of drivers in Europe<sup>12</sup></li> <li>• Most interviewed experts, drivers, employers etc. perceive the new rules set by the directive as an additional burden / hindering obstacle without real benefit</li> <li>• Expected driver shortage could increase, because of the directive. E.g. seasonal drivers, career changers now face an additional obstacle to enter into this occupation<sup>13</sup></li> </ul>
<b>Opportunities</b>	<b>Threats</b>
<p>Macro level</p> <ul style="list-style-type: none"> <li>• Aligning differences in vocational education and training in Europe</li> <li>• Increased road safety and safety of the driver</li> <li>• Better comparability of training for drivers and driver qualifications within Europe</li> <li>• By using learning-outcomes the directive could improve transparency, comparability and recognition of knowledge, skills and competences of drivers within the European Union</li> <li>• Mutual recognition of qualifications achieved in another Member State</li> <li>• Other European policies (Lifelong Learning, EQF, ECVET) could be considered and the directive could be linked to these instruments</li> </ul> <p>Meso level</p> <ul style="list-style-type: none"> <li>• Set a minimum standard for driver qualification, employers know what a driver with a completed CPC is able to do, if an output-oriented approach (knowledge, skills and competences necessary to perform competently the profession) would be followed</li> <li>• Better and more holistic integration of the views of Industries and other stakeholders/experts with regard to knowledge, skills and competences necessary to compete in the labour market</li> </ul> <p>Micro level</p> <ul style="list-style-type: none"> <li>• adequate training for all drivers</li> <li>• increasing number of qualified drivers</li> <li>• increased mobility of newly trained drivers<sup>14</sup></li> </ul>	<p>Macro level</p> <ul style="list-style-type: none"> <li>• Missing training infrastructure in some countries, obligation to set-up a new, adequate training infrastructure, because of directive</li> <li>• Different costs of training measures in the Member States (distortion of competition)</li> <li>• Directive raises differences across Europe, because of different implementation approaches in the Member States (character of a directive)</li> <li>• Very different approaches to handle the directives implementation even within one country (federalism)</li> <li>• Quality of the implementation as a crucial aspect for the success of the Directive</li> <li>• General lack of information in the investigated countries with regard to the directive</li> <li>• Parts of periodic training completed in another European country are often not recognised in another EU country</li> <li>• Requirements for CPC are far lower than for other VET programmes for drivers in some countries (e.g. skilled-worker-certificate)</li> <li>• Directive does not follow a vocational education and training approach and pedagogical considerations, but rather an administrative approach (increased road security)</li> </ul> <p>Meso level</p> <ul style="list-style-type: none"> <li>• Training infrastructure available is often inadequate (e.g. Driving Schools); often quality suffers</li> <li>• Directive up-grades the qualification of professional drivers, but nearly no career opportunities for drivers in the investigated countries</li> <li>• Often well trained drivers have no added value for companies (raises salaries etc.), vocational education and training is often not required</li> <li>• Often employers are not interested in more comparability of their professional drivers, because drivers are not supposed to work abroad (with exception of cross-border traffic)</li> <li>• Apprenticeship training could decrease, because the CPC is an easier and faster way to start working as a driver than 3-year apprenticeship training</li> <li>• Employers agree that the CPC is no measure against driver shortage<sup>15</sup></li> </ul>

<sup>12</sup> Our research shows that most drivers are not considering going abroad for practicing their profession.

<sup>13</sup> Although there is not yet data available on this and it might be still too early to draw real conclusions on this.

<sup>14</sup> Although there is not yet data available on this and it might be still too early to draw real conclusions on this.

	<ul style="list-style-type: none"> <li>• Little interest/motivation in implementing the directive from the side of training providers, stakeholders, employers etc.</li> </ul> <p>Micro level</p> <ul style="list-style-type: none"> <li>• Many drivers wait to the very last moment with initial qualification and periodic training</li> <li>• Directive does not yet have effects on enhanced geographical mobility of professional drivers<sup>16</sup></li> <li>• Often drivers are not interested in more comparability of their professional standards, because they are not considering to work abroad</li> <li>• Training does not lead to more professionalisation of drivers in some countries<sup>17</sup></li> <li>• Since in most of the investigated countries drivers are responsible for paying their CPC there is in dispute, if the directive will lead to an increasing the number of drivers</li> </ul>
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<sup>15</sup> Although it might be too early to draw conclusions on this point.

<sup>16</sup> Although it might be too early to draw conclusions on this point; most of the interviewed drivers are not tending to work abroad.

<sup>17</sup> Although in some countries training has not yet started and therefore there is not yet an influence of the Directive perceivable.

The SWOT-analysis allows us to draw wider conclusions on the effectiveness of directives. The strengths show several positive aspects of the directive. This applies on the micro (image and qualification of the drivers) as well as on the macro level (harmonisation of educational policies for drivers, set-up of a minimum qualification standard for drivers all over Europe). The character of a directive offers on the one hand room for interpretation and could facilitate a smooth transposition into the existing national systems. On the other hand our research shows that the character of a directive leads to even more different systems in Europe (and even within one country). In some countries it opened a parallel track to the existing systems and in other countries it led to the creation of a new system. This fosters the perception that with the directive in place it is not possible to enhance comparability and transparency in driver qualification amongst Europe as well as to mutual recognise driver qualifications.

The consultation of relevant stakeholders including drivers and employers during the implementation process in the investigated countries could be considered as strength of the directive. But also in this respect our analysis show that the majority of stakeholders perceive that they were not able to participate in the development and implementation of the directive in an efficient manner. The weaknesses are two-folded, they concern the character of a directive in general and the content of the directive in particular (options for initial qualification, no measures on how to conduct training).

One main opportunity of the directive is that it could contribute to more comparability and mutual recognition of driver qualification by setting-up minimum requirements. This could be enhanced by using an output- rather than an input-oriented approach. When a learning-outcome-based description of the knowledge, skills and competence of drivers who have completed the CPC would be followed, it would be easier to link the directive to other European Instruments i.e. EQF and ECVET. The directive when implemented properly could provide drivers with the knowledge, skills and competences necessary to work as a professional driver and this could facilitate the process of aligning vocational education and training requirements for professional drivers in Europe. If that could be achieved with the means of the directive is very much depended on the quality of the implementation process. The consulted stakeholders generally doubt that the means of the directive are able to achieve the expected outcomes. They perceive the directive as an additional burden for drivers and they state that in some of the investigated countries training does not have any impact on the quality of the drivers. In countries with test-only option it is criticised that it is not necessary to complete a training programme to receive initial qualification and that this is a kind of status quo with just another test.

## (5) Thresholds and Chances of Directives

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The SWOT-analysis has shown that the directive implicates several strengths, weaknesses, opportunities and threats concerning the implementation of directive 2003/59, although there might be even more strengths and opportunities as well as weaknesses and threats as quoted in the SWOT-analysis. In this section we will discuss the thresholds and chances of directive 2003/59 for enhancing the comparability of VET for drivers in Europe.

### (5.1) Enhance comparability of VET in Europe

Directives are an important means to harmonise different policies within the European Union, with directive 2003/59 a step to enhance the comparability and mutual recognition of training for professional drivers in Europe was set. But since the directive is a directive and no regulation Member States have much room for interpretation. It can be seen in the country analyses that in some countries implementation worked well and the new structures were integrated in the existing structures in an efficient way, whereas in others it have led to a kind of status quo. Since the directive leaves much room for interpretation to the countries, our research show that the directive does not yet have an effect on more comparability of driver qualification levels at European and not even on national level. It is even questioned by the consulted experts, if the directive has any impact on drivers' actual abilities. Some of the experts stated that the needs of the branch would have been better met when introducing a regulation

with a more binding character. The assumption that standardised vocational education and training will lead to better road security, better comparability and therefore more mobility cannot be confirmed. Our research shows, that there is no real want of drivers to be more mobile than they already are, and there is hardly any motivation to seek work in another European country by the interviewed drivers. Although in some countries, for example Austria, third country drivers are already an important resource to maintain road freight transport. The general lack of a "learning culture" in the branch both from the side of the drivers and the side of employers and hardly no career opportunities are other obstacles that cannot be solved with the measures set in the directive.

Directive 2003/59 provides in annex I the minimum qualification and training requirements defined by a list of subjects. This is a rather input than output-oriented approach and does not include a learning-outcome based description of knowledge, skills and competences to be achieved through the training and it does not support the recognition of learning-outcomes achieved at the workplace since every driver has to complete the training modules regardless, if he/she is already able to apply his/her knowledge. By adapting the list of subjects with certain learning-outcomes to be achieved, directive 2003/59 could be improved and it would be an important step in order to approach more comparability of drivers' qualification in Europe. Another advantage of a learning-outcome-based approach is that it then would be possible to align CPC to NQFs, SQFs and EQF. There are some countries that already have finalised their NQFs, for instance the Netherlands, Spain, France, Germany and the UK, although referencing is not yet completed and it is still unclear, if CPC will be referenced. Austria, Italy Finland, and Sweden for example have not yet finalised their NQFs. In Austria and Germany for instance it can be expected that apprenticeship in professional driving and the CPC will be referenced to different levels, if it will be referenced at all. Since the level of knowledge is an important wage indicator, it can be assumed that this might also affect salaries of drivers, although it is too early to draw conclusions on that<sup>18</sup>.

In the Prof-DRV-project one work package intends to develop an EQF compatible core job/qualification profile for the occupation "professional driver" by using a learning outcome approach and defining skills, knowledge and competences needed to perform competently in the workplace and therefore to create conditions for employability. A learning-outcome based description of the knowledge, skills and competences drivers have after completing the driver qualification in a European Member State could facilitate the process of enhancing comparability and mutual recognition of driver qualification in Europe. This could be achieved by referencing the Certificate of Professional Competence to National Qualification Frameworks and align them to EQF. The core job profile developed in the ProfDRV-project could serve as a starting point for linking directive 2003/59 to these existing European Instruments.

## **(6) Conclusions and Outlook**

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Through the analysis of the implementation of directive 2003/59 general conclusion for introducing an EU-wide common VET scheme can be drawn.

One general problem of directives is that they leave much room for interpretation, which is often leading to considerable discrepancies, when implemented on national level. It seems that many countries often choose the easiest way of implementation by just providing what the directive prescribes which in the short and medium term often leads to even more differences within the countries. Low quality often is a result of this, since the directive is too less integrated into the national context. The case investigated shows that directives attempting to harmonise VET might open parallel tracks to existing systems instead of linking old and new requirements in an efficient manner. Another impediment is that directives follow a top-down-approach, thus the contents and implementation strategies are in most countries not with the respective target group, which is leading to the rejection of the directive and the perception that the directive is an additional burden. It would be important to better include the

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<sup>18</sup> This point will be further investigated!

needs of the European Member States (e.g. by conducting qualification needs analysis), when developing directives as well as when implementing directives.

Directives do not impose on the Member States a specific manner of implementation, therefore countries choose very different approaches and this can lead to more confusion than transparency. Better consultation procedures (involvement of national experts, training providers, the respective professional group etc.) during the development as well as the implementation of directives could counteract confusion and enhance comparability and transparency. Directives in vocational education and training should in addition consider national approaches when developing new educational standards: For example, if the national legislation foresees the involvement of social partners when defining new qualifications, this should also be considered when implementing directives in vocational education and training.

One main objective of directives in the field of (vocational) education and training is to contribute to more comparable and mutual recognisable qualifications/qualification requirements as well as to raise the qualification levels of the respective professions. The EQF-approach with its learning-outcome-based descriptions of knowledge, skills and competences could facilitate the process of harmonising / making more comparable European vocational education and training policies / programmes. Therefore it would be important for future directives in the field of vocational education and training to follow an output-oriented-approach by describing the learning outcomes to be acquired in terms of knowledge, skills and competence and to assess the expected learning outcomes of a directive. Then it would be possible to align the qualification requirements defined in a directive to National, Sectoral and finally the European Qualification Framework. This would lead to real comparability and more transparency between training programmes available in EU member states and conclusions on the efficiency of such measures could be made. This is also important when considering the wider educational policy context of the European Union - in which most of these directives are embedded - that aims to become the "most competitive and dynamic knowledge-based economy in the world", capable of sustainable economic growth with more and better jobs and greater social cohesion (Lisbon Strategy) and to establish a European dimension of vocational education and training including the mutual recognition of qualifications and competences (Copenhagen declaration).

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For further information on the project please consult:

[www.project-profdrv.eu](http://www.project-profdrv.eu)

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