



Údarás Um Shábháilteacht Ar Bhóithre
Road Safety Authority

Working To Save Lives

***Partial Regulatory Impact Assessment of
Directive 2003/59/EC on the initial
qualification and periodic retraining of
vocational drivers***

Policy context

In line with directive 2003/59/EC, the Road Safety Authority (RSA) is proposing regulations regarding the implementation of a ***Certificate of Professional Competence*** for all professional passenger vehicle and truck drivers. This will involve a compulsory initial qualification and compulsory periodic retraining of professional drivers every 5 years.

The directive also requires that the state make arrangements to approve training programs and certify trainers delivering those programmes.

The contents of the training course include knowledge of the construction and main component parts of a vehicle, general knowledge of transport and administrative procedures and practical experience of driving goods or passenger vehicles.

Although Member States are encouraged to make provision for more extensive training for professional drivers France and the Netherlands were the only Member States to have introduced basic compulsory vocational training before the new Directive was drafted. As a result most professional drivers in the European Union are working solely on the basis of their driving licence.

It was felt by the European Commission, that in light of this lack of training, a compulsory and uniform ***Certificate of Professional Competence*** be introduced across the Union and therefore on 10 September 2003 ***Directive 2003/59/EC*** came into effect.

Under Article 14 of the directive legislation enforcing the Regulation should be in place by 10 September 2008 for class D vehicles (buses) and 10 September 2009 for class C vehicles (trucks). Since 1 September the RSA has commenced a process for the implementation of this Directive. To transpose this Directive by 10 September 2006 would have precluded the necessary consultation process and not allowed for feedback from stakeholders.

Objectives of the Directive

The Road Safety Authority wishes to implement this directive in the most cost effective and efficient manner possible with the minimum of inconvenience caused to drivers and the industry.

The primary objectives of the directive are:

- To improve road safety
- To raise the standard of new professional drivers and to maintain and enhance the professionalism of existing vocational truck and bus drivers throughout the union.

- To assist in the free movement of workers throughout the EU.
- To attract more drivers to the freight and passenger transport industries by standardisation of training and examination of drivers throughout the EU.
- To standardise regulations throughout the EU, ensuring that unequal conditions of competition do not arise.
- To deliver the best subject matter to students through a universally high standard of training and instructors

Identification of options

Option 1: Do nothing

The government is obliged to implement the directive.

Option 2: Implement the directive

As a member of the European Union The Republic of Ireland was a participant in the negotiations surrounding the formulation of **Directive 2003/59/EC** and is obliged to facilitate its implementation in the State ***therefore this course of action is recommended.***

Options for implementing the directive

The directive requires that, in addition to holding a current relevant driving licence, professional drivers must obtain the **Certificate of Professional Competence (CPC)** and shall continue to undergo periodic retraining every 5 years to retain the CPC.

The government is obliged to make arrangements for:

- The implementation of the CPC for new vocational drivers (**8000 per year** approx)
- Periodic retraining of existing vocational drivers (at least **50,000** based on estimated 51,200 vocational drivers employed in Q2 2006* in the passenger and road freight transport industries)

Initial qualification

Article 3 of the directive requires member states to choose one of two options to provide for the initial qualification on or before 10 September 2008 for class D (bus) drivers and 10 September 2009 for Class C (truck) drivers.

**Per Central Statistics Office report*

A driver does not need to hold a **full** driving licence before undertaking the Initial Qualification for the CPC; however, a driver **must** hold a full driving licence in the appropriate category along with the CPC in order to drive professionally.

The type of Initial Qualification that must be undertaken for the training hours plus test option is dependent upon the age of the driver and the type of vehicle that they wish to drive. The detailed test option applies to all drivers equally, irrespective of age (see fig 1 on page 5).

Option 1 - Combining course attendance and a test

There are 2 alternatives:

(a): E.U imposed regulation of a **280-hour** training course followed by a written/oral test

- Each trainee must drive individually for at least **20 hours** accompanied by an instructor from an approved centre as part of a continual assessment process
- A maximum of **8 hours** out of the twenty shall include driving on special terrain or in a *top of the range* simulator*.
- At the end of the course the relevant authority must give the driver a written or oral test which includes at least one question from the list of subjects outlined in appendix (i)

Or

(b): Accelerated initial qualification consisting of **140 hours** of training following the same syllabus as option 1(a) and is dependant on the age of the driver and the size of the vehicle as out lined in *fig 1* on page 5.

- Each trainee driver must drive for at least **10 hours** accompanied by an instructor from an approved training centre as part of a continual assessment process.
- Each trainee driver must spend a minimum of **4 hours** on special terrain or in a *top of the range* simulator*
- At the end of the course the relevant authority must give the driver a written or oral test which includes at least one question from the list of subjects outlined in appendix (i)

* The term “*top of the range*” is not fully defined in regulations and is assumed that a minimum standard for such a simulator will need to be laid down in legislation

As **fig. 1** demonstrates, accelerated initial training is age specific. Access to certain types of vehicle qualifications would be denied to some drivers on the basis of age.

In addition the directive does not allow vocational training to be carried out in conjunction with the accelerated training.

Fig. 1.

AGE OF DRIVER	CATEGORY OF VEHICLE	INITIAL QUALIFICATION	
		Hours Plus Test 280 or 140	CPC TEST ONLY Theory and Practical
18	Goods vehicles over 3500kg with or without a trailer	280 hours*	6 Hours
18	Goods vehicles between 3500kg and 7000kg with or without a trailer	140 hours	6 Hours
18 ROI only - Restricted to 50 Km routes	Buses and passenger vehicles with accommodation for more than eight passenger. Buses and passenger vehicles with accommodation for more than eight but less than 16 passenger. All with or without a trailer	280 hours*	6 Hours
18 ROI only – No passengers	Buses and passenger vehicles with accommodation for more than eight passenger. Buses and passenger vehicles with accommodation for more than eight but less than 16 passenger. All with or without a trailer	280 hours*	6 Hours
20 ROI only	Buses and passenger vehicles with accommodation for more than eight passenger. Buses and passenger vehicles with accommodation for more than eight but less than 16 passenger. All with or without a trailer	280 hours*	6 Hours
21	Goods vehicles over 3500kg with or without a trailer	140 hours	6 Hours
21	Buses and passenger vehicles with accommodation for more than eight passenger. Buses and passenger vehicles with accommodation for more than eight but less than 16 passenger. All with or without a trailer	280 hours*	6 Hours
21 ROI only Restricted to 50 Km routes	Buses and passenger vehicles with accommodation for more than eight passenger. Buses and passenger vehicles with accommodation for more than eight but less than 16 passenger. All with or without a trailer	140 hours	6 Hours
23	Buses and passenger vehicles with accommodation for more than eight passenger. Buses and passenger vehicles with accommodation for more than eight but less than 16 passenger. All with or without a trailer	140 hours	6 Hours

* Accelerated initial training is not possible

Option 2: involving a test only

The theoretical test will consist of two parts:

- Multiple choice questions, direct questions or a combination of both
- Case studies

The exact contents of the theoretical test will be developed in accordance with the guidelines laid down by the EU and in consultation with stakeholders.

The practical test lasting ***120 minutes*** will consist of two parts:

- Driving test lasting at least ***90 minutes***
- Practical test covering, at a minimum, subjects 1(d), 1(e), 1(f), 3(b), 3(c) and 3(e) (outlined on appendix 1) lasting at least ***30 minutes***

Again the contents of the practical test will be developed in accordance with the guidelines laid down by the EU and in consultation with stakeholders

Vocational training

If Option 1(a) or 1(b) is chosen, the syllabus and training for the CPC will be formalised and administered by the RSA (or a body appointed by the Authority). Should the state adopt a test only option, however, the directive instructs that member states **may** run a vocational training scheme for young drivers. This will allow them to work for financial reward within the state prior to obtaining the CPC. The duration of the vocational training must be between 6 months and 3 years.

The vocational training must be subject to the same training syllabus for either Option 1 or Option 2

In Ireland at present there is limited vocational training for HGV and PSV drivers. It is offered by organisations such as FAS and the various VEC's around the country. The RSA will consult with stakeholders to ensure that the most appropriate vocational training schemes are available to all new drivers.

Many transport companies already have in house training facilities, which should be relatively easy to adapt to the new CPC requirements.

The RSA, in conjunction with the Driver and Vehicle Testing Agency in Northern Ireland (DVTA), will look at the viability of allowing drivers taking the Vocational route to a CPC on both sides of the border to drive in all parts of the island.

Periodic Training

Articles 7 and 8 require member States to ensure that arrangements are put in place for the provision of periodic retraining every five years for vocational drivers who have been:

- Driving professionally for five years after obtaining the initial CPC

Or

- Exempt from the initial training course under the proviso of “**Acquired Rights**” *. Such drivers should receive periodic training within five years of the legislative enactment.

Each member state can, however vary the length of the retraining period from between 3 and 7 years to facilitate coordination of individual driving licence expiration and retraining for CPC

The training will be **35 hours**, which may be taken in blocks ***of no less than 7 hours*** duration over the **5-year period**. There is no requirement in the Regulations for an exam at the end of the retraining period, however paragraph 13 of the introductory preamble states that Member States or their designated entities should be “responsible for organising the tests provided for in connection with the initial qualification **AND** the periodic retraining.

Both the training and retraining programme are concerned with maintenance and development of the vocational drivers ability and must be completed if a driver is to obtain or retain his or her CPC. Drivers who hold a CPC and have ceased to work in the industry shall undergo the CPC retraining course before returning to the industry. Understanding of the meaning of the term “absence from the industry” shall be defined by the RSA.

Equivalence

The directive proposes that people who have successfully completed CPC for class D wishing to apply for a CPC for class C (and vice-versa) should not have to resit the common part of the test.

* *Having held a full class D licence before 10 September 2008 and a class C licence before 10 September 2009*

Community codes

The directive has given member states two options of recording a driver's compliance with the new regulations:

- ***Option 1:*** The relevant authority would issue a ***Certificate of Professional Competence*** on a separate card to be kept with the driver at all times
- ***Option 2:*** Marking the driver's current vocational licence with the community code.

Exemptions

- The Directive does not apply to drivers of:
- Vehicles with a maximum authorised speed not exceeding 45 kph
- Vehicles used by the Armed Forces, Civil Defence, the Fire Service or forces maintaining public order
- Vehicles undergoing road tests
- Vehicles used during states of emergency or assigned to rescue missions
- Vehicles used in the course of driving lessons for any person wishing to obtain a driving licence or a CPC
- Vehicles used for the non commercial carriage of passengers or goods, for personal use
- Vehicles used for the non-commercial carriage of passengers or goods, for personal use.
- Vehicle carrying materials or equipment used by the driver in the course of his or her work, providing that driving the vehicle is not the principle activity of his or her work.

Economic costs of accidents and casualties

In Ireland incidents involving buses and trucks are a comparatively small percentage of the over all road traffic accident statistics. When they do occur however, there can be very serious consequences both socially and economically.

Economic costs and statistics of accidents involving buses and trucks.

Fig 2 highlights the numbers of casualties involving both PSV and HGV vehicles in Ireland in 2005

	<i>Buses</i>	<i>Lorries</i>	TOTAL
<i>Fatal injuries</i>	4	42	46
<i>Serious injuries</i>	11	69	80
<i>Minor injuries</i>	76	346	431*

Fig 2.

** includes 9 accidents that involved both a bus and truck*

Fig 2.1 shows the total cost of casualties. The figures are taken from “parameter values for use in cost benefit analysis of transport projects” Goodbody consultants 2004 and includes factors such as lost output, human costs, medical costs, property, insurance and policing (expressed as 2002 market prices)

Cost of a road fatality	€2,280,000
Cost of a serious injury	€304,600
Cost of a minor injury	€30,000

Fig2.1

Taking into consideration the numbers of casualties and their associated costs the total cost to the Irish economy is shown in figure 2.2 below

	<i>Buses</i>	<i>Lorries</i>	<i>Overall Cost (€)m</i>
<i>Fatal injuries (€)</i>	9,120,000	95,760,000	104
<i>Serious injuries (€)</i>	3,350,600	21,017,400	24.5
<i>Minor injuries (€)</i>	2,280,000	10,380,000	12.9
<i>Total (€)</i>	14,750,600	127,157,400	142

Fig 2.2

As fig 2.2 illustrates, Bus and Lorry accidents cost the Irish economy approximately **€142 million** (2002 market prices) in 2005. The EU Road Safety Action Plan has set a target of a 50% reduction in road deaths across the EU by 2010.

If 50% of these accidents were prevented through improved skills and driving abilities potential **savings of approximately €71 million** (at current market values) could have been made as illustrated in figure 2.3.

Potential approximate savings (given a 50% reduction in traffic accidents)

<i>Buses</i>	<i>Lorries</i>	TOTAL
€7,375,300	€63,578,700	€71 million

Fig 2.3

Benefits and Costs of each option

- ***No change:*** There would be no benefits to adopting this course of action indeed the government would be exposed to infraction proceedings by the E.U. Furthermore, Irish businesses may be denied access to European markets
- ***Adopt the directive:*** The benefits to the industry are dependant on the costs of training, savings made and the reduction in the occurrences of accidents.

The main benefit of adopting options 1a or 1b is that each new driver will have acquired the knowledge and experience associated with four or eight intensive weeks of training with a highly qualified professional

Adopting option 2 in effect means that the state will not impose a codified training syllabus on the industry. The success of the candidates is dependant on the quality of the training received

The quality of the training courses will be determined by the market (in so far higher pass rates of candidates who do a particular training course will attract new candidates).

Costs of the Training Options

In calculating the costs of the training options the following assumptions were made:

- The average weekly earnings in March 2006 of an employee involved in the Land Transport Industry are €673.45, per the Central Statistics office (CSO). Given an average 40 hour week (CSO), average hourly earnings are €17 approximately
- The average cost of a driving lesson is **€55** per hour per The RSA Chief Driver Tester,

- Almost **8000** candidates sat tests for category C and D licences in 2005

Fig 3. Cost of Training (Option1)

	<i>Option 1(a) 280 hours</i>	<i>Option 1(b) 140 hours</i>
Lost Earnings @ €17 per hour	€4,760	€2,380
Cost of training @ €55 per hour	€15,400	€ 7,700
Cost of test	€45	€45
Total Cost per Driver	€20,205	€ 10,125
Total Cost for 8000 Trainees	€161.6 million	€ 81 million

Option 2. Four-hour theory test plus 2-hour practical test

Making an assumption that the test will cost in the region of **€45** and given the number of candidates sitting tests in 2005 the cost of this option would be in the region of:

Fig 4 Cost of training (Option2)

Cost of test	Number of candidates	Total Cost
€45	8000	€360,000

Estimated Costs of Vocational Training

It is difficult to estimate the cost of the vocational training given that individual drivers will require different amounts of training to achieve an acceptable driving standard. Assuming an average cost of **€55 per hour** training fee outlined in the example and given an average of **100 hours** of lessons* for 8000 candidates.

Fig 5

Cost Per Candidate	€5,500
No of Candidates	8000
Total Costs	€44 million

** This is the estimated time taken to train a novice vocational driver to become sufficiently skilled to obtain the CPC, Per RSA Chief Driver Tester*

Periodic retraining

In calculating the costs of the retraining the following assumption were made:

- The Average hourly wage of a driver per CSO statistics is **€17**
- The hourly cost of training is **€55**
- The cost of the test (should it be deemed necessary) is **€45**
- **50,000** people approximately were employed in the transport sector in Q.2 2006 (see page 3),

Fig 4. Costs of 35 hours of re-training

<i>Lost earnings @ €17 per hour</i>	€595
<i>Cost of training @ €55 per hour</i>	€1,925
<i>Cost of test (if applied)</i>	€45
<i>Total cost per driver over 5 years</i>	€2,565
<i>Total cost for 50,000 drivers per anum</i>	<i>€25.65 million</i>
<i>Total cost over 5 years</i>	<i>€128.25 million</i>

General economic benefits and Impacts

- Reduced fuel consumption combined with more efficient use of load transportation will have knock on effects for Irish consumers.
- Should the state fail to implement the directive the Irish road haulage and passenger transport industries would be denied access to the European market whilst at the same time facing competition at home from non-national companies.
- According to Sustainable Energy Irelands “Energy in Ireland 1999-2004” report Irish truck and passenger vehicle industry consumed some 2.1 million tonnes of oil equivalent in 2004. The Momenta report for the Department for

Transport in the U.K (on the Safe and Fuel Efficient Driver Training Programme Autumn 2005) proposed that sufficient driver training will result in a **5%** reduction in fuel consumption which would result in a saving of **105,000 tonnes of oil per anum (approximately 83.5 million litres @ €1 per litre)**

- Reduction in road accidents will save employers the costs of vehicle repair; loss of trade, and the cost to the health service will be reduced.

Fig.5 Total potential savings

<i>Fuel Savings (5%)</i>	<i>Traffic accident reductions of 50% (fig2.4)</i>	<i>Total potential savings</i>
€83.5 million	€70.1 million	€153.6 million

Costs of administering the Certificate of Professional Competence.

The costs to the Authority of administering the CPC will be recoverable in the form of a fee charged to the successful candidate. The Road Safety Authority, following consultation with stakeholders will determine the amount of this fee.

General environmental benefits and impacts

- According to Sustainable Energy Irelands “Energy in Ireland 1999-2004” report, the Irish transport sector was the only sector to experience a significant growth in CO₂ emissions. The Irish Transport industry was responsible for the emission of an estimated 1.8 million tonnes of CO₂ in 2004. The transport sector is the fastest growing contributor to national greenhouse gas (GHG) emissions levels having shown a growth rate of **134%** in the period 1990 to 2004.
- The Kyoto Protocol limits the growth of GHG emission in Ireland to a maximum of **13% above** 1990 levels for the 2008 to 2012 period. In 2004, however, actual national emissions were **23.1% above** 1990 levels.

In addition to avoiding potential penalties, Irelands compliance with the new regulations will result in:

- Improved efficiency in the transport sector in conjunction with lower fuel consumption and reduced wear and tear on vehicles will result in greater productivity per vehicle.

- Extensive training will lead to changing drivers perceptions and attitudes towards a culture of safe driving.

General social benefits

The impact of these general benefits on the direct and indirect costs, to both industry and the State, will vary depending on which training option is adopted. No matter which option is adopted, however, there should be

- Improved standards of professionalism.
- Eventual lower operating cost leading to lower consumer prices.
- It will help to redress the current shortage of drivers.

Effects of the Directive on national competitiveness.

- The directive is community wide and will therefore not give a competitive advantage to any member nation.
- The community wide nature of the directive would allow transport companies from other EU nations to operate here allowing for greater competition and efficiency.

Impacts on the socially excluded or vulnerable groups

- Vocational driver training courses could be made more accessible thereby opening potentially new career paths for people in socially disadvantaged groups. Should a training body such as FAS run a CPC training scheme aimed at the unemployed and other socially excluded groups, it would create professional driving opportunity for those in this social category.
- Passing on the reductions in fuel costs to socially excluded and vulnerable consumers should raise the living standards of that social grouping
- Adoption of the directive will ensure the application of common standards across the EU not allowing one group to be favoured over another
- Some members of the socially excluded groups may suffer difficulties with literacy as a result of limited access to education. The new requirement for literacy in the vocational driving sector may deter these people from entering the industry.

Impact on the Industry and Competition

- The initial compliance costs may cause competitive difficulties for some smaller companies, as larger organisations would be in a better position to absorb any training and compliance costs associated with the new regulations.
- The industry may perceive this as another layer of “red tape” hindering the efficiency of their businesses
- Subsequent reduction in operating costs, if passed on by the industry, would reduce the cost of living or at least go some way to offsetting the effect of rising fuel costs.
- Young drivers may find the cost of the training prohibitive.
- It may well be that many smaller operators or individual drivers are not aware of the forthcoming legislation and will need to be informed of the benefits of the regulations.
- If option 2 is adopted, new drivers may find that 6 hours of tests are difficult to do all at once. This may be remedied by the modularisation of the exam, with credits to be awarded for individual modules of the test without reducing the standard of the testing procedure
- This must be balanced, however with the legitimate concern that the introduction of the CPC, in addition to obtaining a full class C or D licence, will result in duplication of training and unnecessary delays in the influx of new drivers onto the market. Indeed a shortage of experienced drivers could result should there be a high failure rate in the retraining programme.
- The current test for the award of a full class C and class D licence has approximately 80% of the required content for the new CPC, according to The RSA’s Chief Driving Tester. It might be feasible to extend the current hgv/psv test to the standard of the CPC having one test instead of two. This would also coordinate the CPC with the driving licences for all those passing the test after 10/9/08 and 10/9/09

Per the Driver and Vehicle Licensing Agency Northern Ireland, the U.K authorities have decided to modularise and combine the CPC and HGV/ PSV driving tests. The new testing regime consists of two theory modules and two practical modules. (See appendix (iii))

Rights of citizens

- The legislation is not envisaged to adversely affect the rights of the citizen however the RSA will need to be sensitive to the needs of those with limited literacy skill

Summary of the estimated costs and savings of each option to the Irish economy.

The following is a summary of the projected impact on the economy if each of the proposed options were implemented, including employee down time and the direct costs of training

Fig.7 If adopting option 1(a) (280 hour training and test)

8 week course and test	€161.64 million
Periodic retraining	€25.65 million
Total cost	€187.29 million
Less estimated savings (see page13)	€153.6 million
Net cost per year	€33.69 million

Fig. 8 If adopting option 1(b) (140 hour training and test)

4 week course and test	€ 81 million
Periodic retraining	€25.65 million
Total cost	€106.65 million
Less estimated savings (see page11)	€153.6 million
Net savings per year	€46.95 million

Fig.9. If adopting option 2 (test only)

Vocational training and exam	€44.36 million
Periodic retraining	€25.65 million
Total cost	€70.01 million
Less estimated savings (see page11)	€153.6 million
Net savings per year	€83.59 million

Figures 7, 8 and 9 clearly demonstrate that the only option with a direct cost to the economy is 1(a)

Enforcement and compliance.

As with other existing road regulations, public compliance will be enforced by the Gardai. There is a role for RSA outdoor inspection teams to assist the Gardai in enforcing compliance by the industry. Penalties for driving without a valid CPC would be in line with those for driving without a valid driving licence. In addition penalties, such as revoking the operators licence, would be imposed against companies employing non-compliant drivers. The RSA will be working closely with the Gardai to ensure that the regulations are complied within the most cost effective and efficient manner possible.

Review methods

The RSA will act as the competent authority to oversee the development of the tests required to fulfil the states obligations under the directive.

The RSA will be collecting collision data and keeping up to date detailed records of accidents involving all vehicles including those listed in the Directive.

The RSA will look at measures to evaluate the effectiveness of both the testing system and those providing the training. This will be complemented by the European Commissions report, on or before the 10 September 2011, to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions.

Recommendations

Experience from other E.U nations such as the United Kingdom has led to recommendations including the adoption of the test only option with an emphasis on vocational training and the development of an integrated and modular testing system

It is vital that the state implement the directive whilst at the same time being mindful of the need to minimise the impact of cumbersome regulatory practices on the industry. It should maximise the potential for growth in economic, social and environmental areas and encourage a culture of safety in the vocational driving sector and with Irish motorists as a whole, thereby reducing fatalities and injuries on Irish roads.

In this regard it is recommended that the state would do the following:

- ***Introduce option 2 (the test only).***
- ***Allow for the introduction of a new vocational training scheme***
- ***Spread the 35-hour retaining period over the maximum five year period***
- ***Explore the possibility integrating the community code and the driving licence***
- ***Integrate the CPC and the current driving test.***
- ***Stage a high profile public consultation process prior to the implementation of the legislation.***

Appendix (i)

Syllabus for initial training programme

Regardless of which option is chosen the syllabus for the training course will be the same. It will consist of a part common to drivers of vehicles of class C and D and a second part exclusively for drivers of vehicles of class C **or** D:

Instruction will be applied under the following headings:

1. Advanced training in rational driving based on safety regulations

All licences

- (a) Characteristics of the transmission system for optimum efficient use- curves for torque, power.
- (b) Technical characteristics of the safety controls- use of brakes, retarder, using speed and gear ratio
- (c) Using the above knowledge to optimise fuel consumption

Licences C, C+E, C1, C1+E (trucks with or without trailers)

- (d) Loading vehicle with due regard for safety

Licences D, D+E, D1, D1+E (buses with or without trailers)

- (e) Ensuring passenger safety and comfort
- (f) Loading vehicle with due regard for safety and proper vehicle use.

2. Application of regulations

All licences

- (a) Knowledge of the social environment of road transport and its rules.

Licences C, C+E, C1, C1+E (trucks with or without trailers)

- (b) Knowledge of regulations covering carriage of goods

Licences D, D+E, D1, D1+E (buses with or without trailers)

- (c) Knowledge of the regulations covering the carriage of passengers.

3. Health, road and environmental safety, service, logistics

All licences

- (a) Making drivers aware of the risks of the road and accidents at work.
- (b) Prevention of crime and traffic in illegal immigrants
- (c) Prevention of physical risks to self
- (d) Awareness of the importance of physical and mental ability
- (e) Assessment of emergency situations
- (f) Adopting behaviour to enhance the image of the company

Licences C, C+E, C1, C1+E (trucks with or without trailers)

- (g) Knowledge of the economic environment of the road haulage business

Licences D, D+E, D1, D1+E (buses with or without trailers)

- (h) Knowledge of the economic environment of the passenger transportation market.

Appendix (ii)

Summary of estimated costs and benefit

<i>Choices</i>	<i>Estimated costs</i>	<i>Estimated Benefits</i>
Do Nothing	Infarction by EU against Irl and Irish transport companies denied access to EU markets	None

<i>Choices</i>	Approximate Estimated costs	Approximate Estimated Benefits (fig 5)	Approximate Net cost/saving
Option 1(a): 280 hr qualification plus test plus retraining	€187.3million	€119 million	€84 million cost
Option 1(b): Accelerated training Plus test plus retraining	€ 106.7 million	€119 million	€47 million met saving
Option 2:Test Only With retraining and vocational training	€70 million	€119 million	€33 million net saving

Appendix (iii)

Outline of the U.K's modular testing regime

	C or D Licence acquisition Only	C or D Licence and CPC	CPC only
Theory Part 1	√	√	
Theory Part 2		√	√
Practical Part 1	√	√	
Practical Part 2		√	√