

# European Commission's proposal for a directive on driving licences

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## **Introduction**

1. This consultation letter invites you to respond with your views and comments on European Commission ("Commission") proposals to change driver licensing law across the European Economic Area (EEA, that is, the Member States of the European Union plus Iceland, Liechtenstein and Norway).

- The Commission's proposals are explained below at Annex A and set out in full at Annex C. They will affect all Member States, including Great Britain, Northern Ireland and Gibraltar.
- The Department for Transport is concerned about some of the Commission's proposals. We are keen to have the views of all interested parties on them.
- Your views and comments will be taken into account when we formulate the United Kingdom's (UK) negotiating position in response to the Commission.
- The Department will seek to take a balanced view of benefits as well as costs and drawbacks.

## **Closing Date for Responses**

2. Responses must reach the Department for Transport by Friday 9 April. The consultation period has been set at eight weeks to enable us to collate responses in time to inform our negotiations in Brussels.

## **Background**

3. Driving licences in the European Union (EU) are a matter in which responsibility is shared between the Member States and the Commission. Member States issue their own driving licences, within a framework of procedures and standards agreed at EU level.

4. The current EU framework is set by Directive 91/439/EEC, the "second driving licence Directive", which, amongst other things, sets out the knowledge, skills and behaviour required for driving a motor vehicle, the minimum requirements for driving tests, and the minimum standards for physical and mental fitness to drive a motor vehicle. Revisions to these existing standards (including medical standards) are not part of the current Commission proposals, although a new Annex on qualification and training of driving examiners is proposed.

5. The present Commission proposals, however, suggest changes to the administrative and procedural framework within which the standards would be made to work. In the EU, even before the forthcoming enlargement by addition of the new set of "accession states", there are more than 80 different driving licence models and a wide range of corresponding entitlements, all of which are valid and in circulation. This makes policing difficult. The proposed new Directive would update the existing EU requirements for Member States' driving licences by further "harmonising", that is in general tightening, them across the EU.

## **State of Play**

6. The Commission's proposals were published in draft on 22 October 2003. This starts off a process of negotiation to achieve a final text. We expect negotiations in the European Council of Ministers (that is, Member State government Ministers acting in concert) to extend into autumn 2004. In parallel, the draft will also be considered by the European Parliament. Council and the European Parliament must then agree the final text before it can become law. We can expect this whole process to take some 2 or 3 years.

## **The Commission's Proposals**

7. The main changes which we believe the Commission's proposals would make to present practice in the United Kingdom are set out at Annex A, together with an indication of some of the aspects which you may wish to consider as you formulate a response to this letter.

## **Views and Comments Requested**

8. You are invited to give your views and comments in response to any of the Commission's proposals. In order to provide a convenient framework for you to respond, a reply form with our questions is provided at Annex B. Please, however, feel free to respond to any other aspects of the Commission's proposals which you may think important, and to amplify your responses by commentary setting out your underlying reasoning and any other relevant information. These contributions will help to ensure that the UK's negotiating position is well informed. The aim is to develop a more satisfactory text which can be agreed by all Member States.

## **Benefits, Costs and Regulatory Impact Assessment**

9. The Commission justifies its proposed measures by reference to the needs:

- to combat fraud,
- to improve road safety through the implementation of common transport policy, and
- to facilitate the movement of persons changing their place of residence from one Member State to another.

10. With these three aspects particularly in view, the Government will wish to make a realistic regulatory impact assessment of the Commission's proposals. That is, the claimed benefits and any others which are relevant will need to be set (qualitatively or quantitatively) against an appraisal of the likely costs to the Government, the costs to companies and to other organisations, and the costs to individuals.

11. It is intended to make a comprehensive initial Regulatory Impact Assessment as soon as practicable in the light of consultation. The necessary information to make such an assessment is not yet to hand. Your help in providing relevant information and balanced views would contribute to such an assessment. For example, it would be helpful if business or trade association respondents made an estimate of the costs for any areas where there are likely to be new burdens.

## **Consultation Arrangements**

12. This letter is being sent, with the agreement of the relevant Northern Ireland Minister, to consultees throughout the United Kingdom (including Northern Ireland). If you have any questions on this letter or on the attached papers, then please contact

**Guy Slaney**  
**Licensing, Roadworthiness and Insurance Branch 1**  
**Department for Transport**  
**Zone 2/08 Great Minster House**  
**76 Marsham Street**  
**London**  
**SW1P 4DR**

**Tel 020 7944 6650**  
**Fax 020 7944 2459**

or

**Fred Hackman**  
**(at the same address and fax location)**

**Tel 020 7944 2461**

13. Written responses should be made to Guy Slaney at the above address, no later than Friday 9 April.

14. E-mail enquiries or responses should be made by the same date to [Guy.Slaney@df.t.gsi.gov.uk](mailto:Guy.Slaney@df.t.gsi.gov.uk)

### **Internet Access**

15. This document may be freely reproduced and further copies are available on request. A copy of this letter and its Annexes has been placed in the Road Safety section of the Department for Transport (DfT) Internet site at [www.dft.gov.uk](http://www.dft.gov.uk)

### **Outcome of Consultation**

16. At the end of the consultation period, the responses will be assessed and a report will be published on the Department for Transport web site.

### **Consultation Code of Practice**

17. This consultation is undertaken in accordance with the Government's Code of Practice on written consultation (November 2000), a copy of which is at Annex E. If you have any concerns about the consultation process, please contact the Department for Transport's consultation co-ordinator: Andrew D Price, Department for Transport, Zone 4/11, Great Minster House, 76 Marsham Street, London SW1P 4DR (e-mail: [andrewD.price@df.t.gsi.gov.uk](mailto:andrewD.price@df.t.gsi.gov.uk)).

### **Disclosure of Information**

18. The Department may be asked to make public the content of replies it receives to this letter. When submitting comments, please would you say if you do not wish us to make a copy of your reply available if we are requested to do so.

### **Attachments**

19. Attached are:

- Annex A: the likely changes in the UK which would result from the European Commission's proposals if agreed unamended;
- Annex B: reply form
- Annex C: the European Commission's proposals;
- Annex D: list of consultees
- Annex E: Code of Practice on Written Consultation

## **Annex A - Main Implications for Change to Present UK Practice**

### ***Respect for existing entitlements to drive***

A1. The Commission intends that existing entitlements to drive granted before the new measures come into force will be respected, that is "grandfather rights" will be respected. It is proposed that the new measures would affect only new licences issued after the date the new Directive comes into force.

### ***Limited administrative validity and medical examinations***

#### **(Article 8.2 of the Commission's proposals).**

A2. The proposals introduce a new concept at EU level: "limited administrative validity" of the driving licence document.

A2.1. This means that licence documents (but not the individual's entitlement to drive) have to be renewed periodically, with periodicity harmonised across the EU. Hitherto the validity periods for licences and medical checks have been left to Member States. The proposed new measure has potential administrative and customer service advantages: it would facilitate greater accuracy of the record and of the data on the licence.

A2.2. Limited administrative availability would apply to all licence documents issued after the date when the new measures came into force. It would therefore apply to the documents associated with all new entitlements to drive granted after that date. It would also affect all licence documents requiring renewal or having to be re-issued because of loss or theft. Licence documents (including the driver's photograph) would be renewed periodically to update their administrative validity.

- **Drivers up to age 65:** administrative renewal would be required every 10 years for drivers of mopeds, motorcycles, cars and light vans, and every 5 years for drivers of medium and large goods vehicles, minibuses, buses and coaches;
- **Drivers over age 65:** administrative renewal would be required every 5 years for drivers of mopeds, motorcycles, cars and light vans, and every year for drivers of medium and large goods vehicles, minibuses, buses and coaches.

A2.3. For the holders of existing licences to drive mopeds, motorcycles, cars or light vans, the new periods of limited administrative validity for licence documents would mean that, aged 70 and over, they would have to renew every 5 years instead of every 3 years as now. Until age 70, so long as the licence document was not renewed, there would be no effect.

A2.4. Revisions to the medical standards for driver licensing are not part of the Commission's current proposals although they are subject to separate review. The changes now proposed by the Commission to the administrative and procedural framework would affect the frequency of medical examinations, whose content could in future go beyond current requirements.

- As yet, no medical test or examination upon administrative renewal is proposed for the drivers of mopeds, motorcycles, cars or light vans. But they are not ruled out, since the proposals explicitly allow Member States to require such tests.
- For the drivers of medium and large goods vehicles, minibuses, buses and coaches, a medical examination would be required on the renewal of the licence. That would mean every 5 years at ages up to 65 years and every 1 year thereafter. Under age 45, this would be a new requirement in the UK.

*Considerations:*

- *In the short run, new licences would prove better against fraudulent use and counterfeiting. In due course there would be a common framework throughout the EU of administrative validity for driving licences. On the other hand, the new system would add to the existing multiplicity of licence formats and rules for 40 or 50 years. Do you think that the advantages (to the EU, to the UK, to UK organisations or to UK residents) outweigh the disadvantages?*
- *What do you see as the advantages and disadvantages of a five-yearly medical test for drivers of medium and large goods vehicles, minibuses, buses and coaches, at under age 45?*

***Plastic card licence, computer chip and anti-forgery measures***

**(Article 1 and Article 3 of the Commission's proposals).**

A3. The Commission proposes to move exclusively to the plastic card format for newly-issued licences. It proposes to allow Member States to insert a microchip on the licence (the chip would be explicitly limited to the functions of a driving licence). Both these measures would help to increase the security of the licence and counter the growing threat from fraudsters and counterfeiters. Anti-forgery measures would also apply, under Commission scrutiny, to driving licences issued before the entry into force of the proposed new Directive.

*Considerations:*

- *There could be large advantages from providing some limited flexibility in the content of the chip. Biometric information (such as fingerprint or iris recognition) on the chip would increase driving licence security. The restrictions proposed by the Commission would make it difficult to develop a business case on the basis of driving licence use only. This would not allow the full potential of the technology to be exploited; it would restrict interoperability with other smart card applications; and it would require the public to pay for several cards.*
- *DVLA expects shortly to be issuing a consultation proposing removal of the licence counterpart: the outcome of this consultation could have implications for the kind of information it might be sensible to hold on a chip.*
- Do you agree there would be benefits in placing a microchip on the driving licence?
- Do you think there would be benefits in allowing flexibility so that, in future the one plastic card could have other uses?

***Categories of vehicle, minimum ages, tests and progressive access***

**(Articles 4, 6, 7, and 8 of the Commission's proposals).**

A4. The Commission proposes a complex series of inter-related changes to the definitions of the various categories of vehicle and to the minimum ages for particular categories, along with progressive access to some categories. As with the other proposals, these changes would apply only to new licences issued after the new Directive comes into force.

A4.1. ***Harmonising sub-categories*** (Article 4.1 of the Commission's proposals). The Commission proposes to extend the application across the EU from "categories" (that is, from motorcycles - Category A; cars and light vans - Category B; medium and heavy goods vehicles - Category C; minibuses, buses and coaches - Category D) to the more detailed proposed "sub-categories" (that is, to A1, A2, A, C1, C, D1, D - see below). Category B1 (motor-powered tricycles and quadricycles) would remain at the discretion of the individual Member States (Article 4.3), although with a change of definition to align with Directive 2002/24/EC relating to the type-approval of two and three-wheel motor vehicles.

A4.2. ***Mopeds*** (Articles 4.1, 4.2(b), 7.1(a), 7.2 and 8.1(b) of the Commission's proposals). Mopeds are introduced as a category ("AM") at EU level, defined as "two- or three-wheel vehicles with a maximum design speed exceeding 6 km/h but not exceeding 45 km/h and characterised by an

engine whose cubic capacity does not exceed 50 cubic centimetres in the case of the internal combustion type, or whose maximum continuous rated power is no more than 4 kW in the case of an electric motor. In the case of a three-wheel moped, the maximum net power output of the engine may not exceed 4 kW in the case of other internal combustion engines" (Article 4.1). Mopeds are to exclude light quadricycles or cycles with pedal assistance (Article 4.2(b)).

- It is proposed to allow for access to mopeds from age 16 (with permission to Member States to issue moped licences from age 14), but to allow Member States to refuse to recognise the validity on their territory of a driving licence for mopeds if the rider is under 16 years of age (Articles 7.1(a) and 7.2) .
- Only a theory test, not a practical and theory test as presently required in the UK, would be required for prospective moped riders, so that we would be obliged to accept on our roads moped riders from other Member States who had not taken a practical test (Article 8.1(b)).

A4.3. **Motorcycles** (Articles 4.1, 4.2, 7.1, 7.2, 8.1, 8.2, and 8.3 of the Commission's proposals). The new proposals provide for the following.

- **Three subcategories.** The subcategories would be redefined, introducing a new power to weight ratio criterion, and a new "medium-sized" category A2 so as to distinguish clearly the more powerful motor cycles and to prevent or discourage tampering of light machines so as to achieve high speed (Article 4.1). The new categories would become:
  - A1 (light motorcycles): cylinder capacity not exceeding 125 cubic centimetres; power output not exceeding 11 kilowatts; power to weight ratio not exceeding 0.1 kilowatts per kilogramme.
  - A2 (medium motorcycles): with or without sidecar; power not exceeding 35 kilowatts; power to weight ratio not exceeding 0.2 kilowatts per kilogramme; not derived from a vehicle of more than double its power.
  - A (in effect, heavy motorcycles): all motorcycles, with or without sidecar.
- **Minimum ages, test requirements and progressive access.** The text is ambiguous (see for example Article 7.2), but the Commission's intentions appear to be as follows.

- Category A1:

the minimum age for light motorcycles would remain unchanged, and entitlement would depend on passing a theory and a practical test. (Articles 7.1(a) and 8.1 (a)).

We would wish to be sure that we retained the UK's right to make the minimum age 17.

A Member State would, on the present text, be unable to refuse to recognise the licence, issued by another Member State, of the rider of a light motorcycle aged between 16 and 17 (deletion at Article 7.2).

- Category A2:

Individuals from the minimum age of 18 years (possibly 17 on the Member State's national territory only) would be permitted to ride the medium (A2) cycles, subject to passing a practical test (Articles 7.1(b) and 7.2).

A theory test would also be mandatory for applicants with less than 2 years experience on A1 (Article 8.1(c)).

- Category A:

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A mandatory practical test would govern access to the most powerful category of motorcycle, whatever the experience of the applicant (Article 8.1(d)).

A theory test would also be mandatory for applicants with less than 3 years experience on A2 (Article 7.1(c) - although text at 8.1(d) conflicts with this).

Access to the most powerful category would be permitted only at age 24 (or older), or from age 21 in the light of three years practical experience on smaller machines (Articles 7.1(c) and 7.1(d)).

### A4.4. *Cars and light vans* (Articles 4, 7.1, and 8.2 of the Commission's proposals).

- A new optional category (B1) of motor-powered tricycles and light quadricycles would be introduced with definitions as follows (Articles 4.1, 4.2 and 4.3). Access to this optional category would be from age 16 (Article 7.1(a)).
  - **Tricycle** means a vehicle with three symmetrical wheels and an engine with a cubic capacity in excess of 50 cubic centimetres in the case of an internal combustion engine and/or the maximum design speed of which is in excess of 45 km/h.
  - **Quadricycle** means a vehicle other than a light quadricycle the unladen mass of which is no more than 400 kg (550 kg for vehicles used for the transport of goods), disregarding the battery mass in the case of an electric vehicle, where the net maximum power of the engine does not exceed 15 kW.
- The definition of cars and light vans (category B) would be changed from the present "having not more than eight seats in addition to the driver's seat" to "transporting no more than 8 passengers in addition to the driver" (Article 4.1).
- It is proposed to change and clarify the present confusing rule about cars and light vans with trailers. A weight criterion of 750 kg would apply to the trailer only, and not (as with the present higher weight criterion) to the vehicle and trailer combination (Article 4.1).
- As regards minimum ages, it appears that access would be permitted to cars and light vans from age 18, and from age 17 on the Member State's national territory only (Articles 7.1(b) and 7.2).

### A4.5. **Medium and large goods vehicles, minibuses, buses and coaches** (Articles 4.1, 6.2, 6.4, 7.1(b), 7.1(c), 7.1(d), 8.2 and 8.3 of the Commission's proposals).

It is proposed to reduce the upper weight limit (maximum authorised mass) covered by the medium goods vehicles (C1) entitlement to 6.0 tonnes, as opposed to the present 7.5 tonnes. (Article 4.1).

- For buses and coaches: the length of the smaller category of vehicles (category D1) would be limited to 7 metres; and the "number of seats" criterion would be replaced by "number of passengers" to outlaw the practice of removing seats from the larger buses so as to allow driving at lower entitlement (Article 4.1).
- As regards the minimum ages, the proposed changes are as follows (Articles 7.1(b), and 7.1(c)):

Category of vehicle	Current position	European Commission's Proposal
Medium goods vehicles, with trailer. (Category C1+E)	21 years	18 years
Bus or coach, with or without trailer (Categories D and D+E)	21 years	24 years

- The Commission proposes progressive access to the larger vehicles, both for professional and for non-professional drivers. Progressive access for professional drivers has been established by the recent Driver Training Directive<sup>1</sup>. Under the Driver Training Directive, from September 2008, all professional drivers will have to obtain a "Certificate of Professional Competence" (CPC) to continue in their profession. The present proposals are that young professional drivers (below age 21 for Category C and below age 24 for Category D) can have access to larger vehicles so long as they hold a CPC. Non-professional drivers are exempted from the requirements of the Driver Training Directive. But, under the progressive access rules that the Commission is now proposing, these drivers could only have access to larger vehicles from a higher age if they had not obtained a CPC.

A4.6. **Equivalences between categories** (Article 6.2). It is proposed, for drivers aged at least 21 years, that minibus (sub-category D1) licence holders will be permitted to drive medium goods vehicles (sub-category C1) and vice-versa.

*Considerations:*

- *Do you agree with the Commission's proposals for revised categories, equivalences between categories, minimum ages, tests and progressive access? What do you see as the key benefits and drawbacks, including costs? How should the system be changed?*
- *Would a simpler system of vehicle categories, or tests, or progressive access be more appropriate (for example for motorcycles in comparison with cars and light vans)? If so, what simplifications would you suggest?*
- *What are the advantages and disadvantages (to the EU, to the UK, to UK organisations or to UK residents) of the proposals*
  - *for new riders of mopeds or motorcycles (we may need, for example, to be clear that the national derogation to age 17 for access to A2 would be available),*
  - *for new drivers of cars and light vans,*
  - *for new drivers of medium and large goods vehicles, or*
  - *for new drivers of minibuses, buses or coaches?*
- *Are the proposed changes to the definitions of vehicle categories enforceable? If not, which ones would give difficulty, what would be the nature of the difficulty, and what improvements should be made?*
- *Would you prefer to see a mandatory practical test for moped riders? If so, how important would this be, compared with other measures such as the practical tests proposed for other categories and subcategories of vehicle?*
- *For drivers of medium and large goods vehicles, minibuses, buses or coaches, will the proposed five-yearly administrative renewal fit-in in practice with the requirements for a Certificate of Professional Competence as required by the recent Driver Training Directive 2003/59/EC?*
- *What are the advantages and disadvantages of equivalence between entitlement to drive a medium-sized goods vehicle and a minibus? Is increased flexibility desirable or not, and why? If more flexibility is desired, is there a better way of achieving it, and how would you suggest that this be done?*
- *Is the proposed reduction in the maximum authorised mass for Category C1 (reflecting similar chassis and handling characteristics) a sensible trade-off for C1/D1 equivalence?*

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<sup>1</sup> Directive 2003/59/EC on the Initial qualification and periodic training of drivers for the carriage of goods or passengers by road.

### *Novice licences*

#### **(Article 8.2 of the Commission's proposals).**

A5. It is proposed that Member States may limit to 3 years the period of validity for the first driving licence for mopeds, motorcycles, cars or light vans

*Consideration:*

- *Do you see any practical difficulty with the proposed option to limit the validity of novice driving licences, alongside the New Drivers' Act<sup>2</sup> and the corresponding legislation in Northern Ireland? If so, how would you suggest that the proposals could be improved?*

### *Driving examiners*

#### **(Articles 9, 10, 11 and Annex IV in the Commission's proposals).**

A6. The Commission proposes a regime of initial qualification and periodic re-training of driving examiners. For the initial qualification it is proposed that progressive access should apply, that is, that examiners for lorries, buses and motorcycles (Categories C, D and A) should previously have experience of and qualification in testing cars (Category B), as well as hold a driving licence of the category concerned. They must also possess teaching skills. For the periodic training it is proposed that driving examiners undergo an amount of theoretical and practical training annually. The amount of periodic training varies according to the type of vehicle the examiner tests: 3 days for Category B vehicles and 5 days for all other categories.

A6.1. These proposed requirements are less flexible than current UK practice. In Great Britain, the Driving Standards Agency (DSA) is the responsible body.

- Currently it employs a form of progressive access for DSA examiners.
  - A DSA examiner is required to test for a period of between 6 and 9 months on Category B vehicles before progressing on to other categories. But DSA does not require the examiner to hold a licence in the category that is being tested: instead, the authority to test on the relevant category of vehicle is given by a DSA-issued "warrant card" issued on conclusion of the examiner's training.
  - Organisations with "delegated examiner" status, such as bus companies, test only on the category of vehicle most frequently used by that organisation.
  - Organisations with authority to conduct their own tests, such as the MoD, fire and police authorities might test across a range of categories
- The DSA provides examiners with periodic training as and when required, for example to update skills relating to the introduction of new legislation or for personal development. The amount of training is not pre-determined.

A6.2. The initial DSA view is that the Commission's proposals for driving examiners as they stand would impose administrative burdens and costs on DSA itself and on other organisations with authority to conduct driving tests.

- This is true both of the requirement to hold the relevant driving licence and of the requirement to undergo a pre-determined period of theoretical and practical training on the category (or categories) of vehicle that the examiner tests. Each examiner would need to undergo separate periods of training for each category of vehicle that they test on.

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<sup>2</sup> The Road Traffic (New Drivers) Act, 1995.

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- Training should be targeted to address any examiner failings, and to deal with changes in the law and with new technological developments.

*Considerations:*

- *Do you agree with the Commission's proposed requirements for the initial qualification and/or periodic training of Driving Examiners?*
- *Would the requirements for the initial qualification and/or periodic training impose an additional burden on your organisation? If so, what burden or burdens?*
- *Are there any offsetting advantages? If so, do the advantages outweigh the disadvantages?*
- *Please suggest and justify any better alternative to the requirements proposed for the initial qualification and periodic training of driving examiners*

### ***Withdrawn licences***

**(Article 8.5 in the Commission's proposals).**

A7. It is proposed that Member States would not be permitted to issue a new or renewed driving licence to a person who already holds a driving licence issued by an EU Member State or whilst their licence is suspended by the authorities in another Member State.

*Considerations:*

- *Do you agree or disagree with this measure?*
- *If you disagree, what are your reasons?*

LRI1/DfT

23 January 2004

## **Annex D - List of Consultees**

### **Great Britain Consultee Organisation List**

AA

AA Driving School

AA Foundation for Research

AA Motoring Trust

ACPO

ACPO Scotland

ADI Business Club

ADI Federation

Advanced Vehicles Builders

Advisory Panel on Driving Disorders of the Cardiovascular System

Age Concern Cymru

Age Concern England

Age Concern Scotland

Agricultural Engineers Association

All Party Parliamentary Group

Alliance of Independent Retailers Ltd

Amateur Motorcycling Association

Arriva PLC

Arthritis Care

Association of British Drivers

Association of British Insurers

Association of British Motor Clubs

Association of Industrial Road Safety Officers

Association of Local Authority Bus Managers

Association of London Borough Road Safety Officers

Association of London Government

Association of Magisterial Officers

Association of Retired and

Association of Vehicle Recovery Operators

Bradford Transport Training

BRAKE

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British Association of Removers  
British Car Auctions Ltd  
British Chambers of Commerce  
British Epilepsy Association  
British Fire Service Association  
British Horse Society  
British Independent Motor Trade Association  
British Industrial Truck Association  
British Marine Federation  
British Medical Association  
British Motorcycles Federation  
British Retail Consortium  
British School of Motoring  
British Vehicle Rental and Leasing Association  
British Vehicle Salvage Federation  
Bus and Coach Station  
Cabinet Office  
Campaign Against Drink Driving  
Campaign Protection for Rural England  
Camping and Caravanning Club  
Chambers of Commerce  
Charity Law Association  
Chartered Institute of Transport  
Chartered Management Institute (formerly British Institute of Management)  
Cheshire County Council  
Chief and Assisntand Chief Fire Officers Association  
Child Accident Prevention Trust  
Coach Association  
Coach Monthly  
Coach Operators Federation  
Commercial Motors  
Commission of Racial Equality  
Community and Youth Workers Union  
Community Matters

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Community Transport Association  
Confederation of British Industry  
Confederation of British Industry Scotland  
Confederation of British Industry Wales  
Confederation of Passenger Transport  
Construction Equipment Association  
Construction Plant Hire Association  
Consumer Association  
Convention Of Scottish Local Authorities  
Council of Civil Service Union  
Crown Office  
Crown Prosecution Service  
CSMA  
Dairy Industry Association  
Dairy Trade Federation  
Department for Constitutional Affairs  
Department of Health  
Department of Trade and Industry  
Department of Transport  
Department of Transport Highways & Traffic Division  
Despatch Association  
DFES  
DFT  
    Mobility and Inclusion Unit  
    Road Safety and Vehicle Standards Division  
Diabetes UK  
Disabled Drivers Association  
Disabled Drivers Motors Club  
Disabled Persons Transport Advisory Committee  
DOE  
Driver and Vehicle Licensing (NI)  
Driver and Vehicle Standards  
Drivers Action Movement  
Driving Instructors Association

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Driving Instructors Scottish Council

DVLA

DVLNI

Environmental Transport Association

Epilepsy Action

Farmers Union of England (NFU)

Farmers Union of Scotland (NFUS)

Farmers Union of Wales (FUW)

Federation Of Public Passenger Transport Employers

Federation of Small Businesses

Finance and Leasing Association

First Group Aberdeen

Fleet Audits Ltd

Ford Motor Co Ltd

Forum Mobility Centres

Forum of Private Business

Forum of Private Business in Scotland

Freight Transport Association

General Medical Council

Government of Gibraltar

Green Flag Ltd

Guild of Experienced Motorists

Heavy Transport Association

Historic Commercial Vehicle Society

Home Office

Honorary Medical Advisory on Driving and Psychiatric Disorders

Honorary Medical Advisory Panel on Driving and Alcohol, Drugs and substance Misuse

Honorary Medical Advisory Panel on Driving and Daiabetes Mellitus

Honorary Medical Advisory Panel on Driving and Visual Disorders

House of Commons Library

Institute of Advanced Motorists

Institute of Directors

Institute of HGV Driving Instructors

Institute of Highways and Transportation

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Institute of Road Safety Officers  
Institute of Road Transport Engineers  
Institute of Trading Standards Administration  
Institute of Transport Administration  
International Breakdown  
International Historic Vehicle Organisation  
Joint Committee on Mobility for the Disabled  
Justices Clerks Society  
Keep Death off our Roads  
Learn 2 Live  
Learn and Live  
Local Authority Road Safety Association  
Local Authority Road Safety Officers Association  
Local Government Association  
Logistical Support Services  
Magistrates Association  
Manheim Auctions  
Metropolitan Police  
Military Vehicle Trust  
Ministry of Defence  
Mobility Advice and Vehicle Information Services  
Motability  
Motor Schools Association  
Motorcycle Action Group  
Motorcycle Industry Association  
Motorcycle Industry Federation Ltd  
Motorcycle Retailers Association  
Motorcycle Rider Training Association  
National Assembly of Wales  
National Association of Citizens Advice Bureau  
National Association of Local Councils  
National Caravan Council  
National Council for Civil Liberties  
National Council for Voluntary Organisations

European Commission's proposal for a directive on driving licences

National Express Group PLC  
National Farmers Union  
National Federation of Self Employed & Small Businesses  
National Freight Consortium PLC  
National Joint Committee for Young HGV Drivers  
National Owner Drivers Association  
National Union of Road  
National Vintage Tractor and Engine Club  
NEXUS  
Parliamentary Advisory Committee on Transport Safety  
Pedestrian Association  
Persons over 50 ARP/50  
Police Federation for Northern Ireland  
Police Federation of England and Wales  
Public and Commercial Services Union  
RAC  
RAC Foundation  
RAC Public Services  
Recruitment and Employment Confederation  
Retail Motor Industry Federation  
Skills for Logistics  
Road Haulage Association  
Road Roller Association  
Road Safety Council of Wales  
Road Transport (Industry)  
Road Transport Association  
Roadpeace  
Royal Association for Disability and Rehabilitation  
Royal College of Ophthalmologists  
Royal College of Physicians  
Royal Society for the Prevention of Accidents  
Safety Training Advisory Council  
Scottish Borders Elder Voice: Over 50 (Partnership)  
Scottish Community Transport

European Commission's proposal for a directive on driving licences

Scottish Court Administration  
Scottish Executive  
Scottish Motor Trade Association  
Scottish Parliament  
Scottish Police Federation  
Showmans Guild of GB  
Slower Speeds Initiative  
Small Business Services  
Small Enterprise Research Team  
Society of Motor Manufacturers and Traders  
Stagecoach  
Sustrans  
System Driving Training  
The Ambulance Service Association  
The British Institute Facilities Management Foundation  
The British Safety Council  
The Caravan Club  
The Disabled Drivers Association  
The Institute of Logistics and Transport  
The Joint Mobility Unit Access Partnership  
The Motorists Forum  
The National Assembly for Wales  
The Scottish Parliament  
The Scottish Road Safety Campaign  
The Union of Independent Companies  
Trade Union Congress  
TRANSFED  
Translink NI Ltd  
Transport 2000  
Transport and General Workers Union  
Transport Association  
Transport Operatives  
Transport Research Laboratory  
Transportant Associates

UNISON

United Road Transport Union

Vehicle Builders and Repairers Association

Vehicle Industry Consultants

Vehicle Operator Services Agency

Vehicle Registration and Licensing Department

Veteran Car Club

Village Publishing Ltd

Vintage Sports Car Club Ltd

Wales Community Transport

Wales Office

Walton Centre for Neurology and Neurology and Neurosurgery

Welsh Local Association

West Midlands Fire Service

**Northern Ireland Consultee Organisation List**

Age Concern

Alliance Party for NI

Amalgamated Transport & General Workers Union

Antrim Borough Council

Ards Borough Council

Armagh City & District Council

Association of Local Authorities

Ballymena Borough Council

Ballymoney Borough Council

Banbridge District Council

Belfast City Council

British Motorcyclists Federation

Campaign Against Drink Driving

Carrickfergus Borough Council

Castlereagh Borough Council

Child Accident Prevention Trust

Cllr R Beggs MP

European Commission's proposal for a directive on driving licences

Coleraine Borough Council  
Confederation of British Industry  
Cookstown District Council  
Craigavon Borough Council  
Democratic Unionist Party  
Department of Enterprise Trade & Investment  
Derry City Council  
Disability Action  
Disabled Drivers Association NI  
Down District Council  
Down North Unionist Office  
DRD Roads Service  
Dungannon District Council  
Equality Commission for NI  
Equality Forum NI  
Federation of Small Businesses  
Fermanagh District Council  
Freight Transport Association  
General Consumer Council for NI  
Institute of Directors  
Lagan Valley Unionist Office  
Larne Borough Council  
Law Reform Advisory Committee  
Law Society of NI  
Limavady Borough Council  
Lisburn City Council  
Magherafelt District Council  
Moyle District Council  
Mr E McGrady MP  
N.I. Association of Citizens Advice Bureaux  
N.I. Chamber of Trade  
N.I. Committee of the Irish Congress of Trade Unions  
N.I. Private Coach Operators Association  
N.I. Resident Magistrates' Association

European Commission's proposal for a directive on driving licences

N.I. Rider Trainer Scheme  
N.I. Transport Holding Co. Ltd.  
Newry & Mourne District Council  
Newtownabbey Borough Council  
NI Chamber of Commerce & Industry  
NI Conservative Party  
NI Court Service Headquarters  
NI Human Rights Commission  
NI Womens Coalition  
NIO (Criminal Justice Division And Police Division)  
North Down Borough Council  
Northern Ireland Council on Disability  
Northern Ireland Green Party  
Northern Ireland Policing Board  
Northern Ireland Unionist Party  
Office of First Minister & Deputy First Minister  
Office of the Director of Public Prosecutions  
Omagh District Council  
Owner Drivers Association  
Pedestrian Association  
Progressive Unionist Party  
PSNI Road Policing Development Branch  
Road Safety Council of NI  
Road Transport Association NI  
Road Trauma Support  
Rospa (NI)  
SDLP Headquarters  
Sinn Fein  
Strabane District Council  
The Retail Motor Industry Federation  
The Rt Hon David Trimble MP  
Translink  
Ulster Automobile Club  
Ulster Farmers Union

European Commission's proposal for a directive on driving licences

Ulster Unionist Party

United Kingdom Unionist Party

Woman's Forum

Workers Party

Youth Council for Northern Ireland

## **Annex E - Code of Practice on Written Consultation**

The code of practice applies to all UK national public consultation documents in electronic or printed form.

Though the criteria may have no legal force, and cannot prevail over statutory or other mandatory external requirements (e.g. under European Community Law), they should otherwise generally be regarded as binding on UK departments and their agencies, unless Ministers conclude that exceptional circumstances require a departure.

The criteria should be reproduced in consultation documents, with an explanation of any departure, and confirmation that they have otherwise been followed.

### **Consultation Criteria**

- Timing of consultation should be built into the planning process for a policy (including legislation) or service from the start, so that it has the best prospect of improving the proposals concerned, and so that sufficient time is left for it at each stage.
- It should be clear who is being consulted, about what questions, in what timescale and for what purpose.
- A consultation document should be as simple and concise as possible. It should include a summary, in two pages at most, of the main questions on which it seeks views. It should make it as easy as possible for readers to respond, make contact or complain.
- Documents should be made widely available, with the fullest use of electronic means (though not to the exclusion of others), and effectively drawn to the attention of all interested groups and individuals.
- Sufficient time should be allowed for considered responses from all groups with an interest. Twelve weeks should be the standard minimum period for consultation.
- Responses should be carefully and open-mindedly analysed, and the results made widely available, with an account of the views expressed, and reasons for decisions finally taken.
- Departments should monitor and evaluate consultations, designating a consultation co-ordinator who will ensure the lessons are disseminated.

More information about the code of practice is available on the Cabinet Office website:

<http://www.cabinet-office.gov.uk/regulation/Consultation/Code.htm>

If you have any complaints or comments about this consultation process please contact:

**Andrew D Price**  
**Consultation Coordinator**  
**Department for Transport**  
**4/11 Great Minster House**  
**76 Marsham Street**  
**London, SW1P 4DR**

**email: [andrewD.price@dft.gsi.gov.uk](mailto:andrewD.price@dft.gsi.gov.uk)**