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
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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@dft.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

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: andrew.D.price@dft.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:**
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 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)):

<table>
<thead>
<tr>
<th>Category of vehicle</th>
<th>Current position</th>
<th>European Commission's Proposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medium goods vehicles, with trailer. (Category C1+E)</td>
<td>21 years</td>
<td>18 years</td>
</tr>
<tr>
<td>Bus or coach, with or without trailer(Categories D and D+E)</td>
<td>21 years</td>
<td>24 years</td>
</tr>
</tbody>
</table>
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- 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 Directive¹. 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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¹ 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' Act2 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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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?

LR11/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 Cardovascular 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 Assistant 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 Diabetes 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
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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
European Commission's proposal for a directive on driving licences

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:

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