



Case Study v.1 on
2003/59/EC – standardised Europe-wide
initial and continuous vocational education and training
for professional drivers:
Strategies, consequences, opportunities and threats

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Prepared by:	Tanja Bacher and Sigrid Nindl, 3s research laboratory (AT)		

Short summary:

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

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

(1) Introduction

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

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

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

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

The European Union has several instruments for harmonising educational policies within the Member States with the aim to bring national laws of the Member States into line with one another. Harmonisation¹ in this regard means to make sure that the rules laid down by the different EU countries impose similar obligations on citizens of all those countries and that they impose certain minimum obligations in each country. In this section the development and implementation of directives in the EU as one of these instruments and several directives and recommendations that aim at harmonising educational policies are discussed.

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

The European secondary legislation comprises the binding legal instruments (regulations, directives and decisions) and the non-binding instruments (resolutions and opinions) provided in the European Treaty on Functioning of EU States (EUR-Lex²). In Article 288 of the Treaty, which builds the European Unions' constitutional basis, the EU constitutes that "to exercise the Union's competences, the institutions shall adopt regulations, directives, decisions, recommendations and opinions" (Official Journal of the European Union C83, p. 171-172). In short the differences of these instruments are the following:

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

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

After finalising a draft directive the Council of Ministers, the Commission and the European Parliament are launching a public consultation period, therefore a draft of the directive is published and public is invited to discuss

¹ Cf. http://europa.eu/abc/eurojargon/index_en.htm (27.01.2012).

² Cf. http://eur-lex.europa.eu/en/droit_communaire/droit_communaire.htm#1.3 (05.01.2012).

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

(2.2) Directives and Recommendations relevant for this Case Study

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

First steps for harmonising road transport in Europe were set in 1976 when the **Council directive 76/916/EEC** on the minimum level of training for road transport drivers was established. In 1985 the European Union issued **Council regulation No 3820/85** on the harmonization of certain social legislation relating to road transport. Regulating amongst other issues the minimum age of drivers in the European Union, the maximum driving periods and the break and resting periods. And finally **directive 91/439/EEC** on driving licences specifying the European Driving License regulated driving licenses of all categories within the European Union. **Directive 2003/59** on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers amended Council regulation No 3820/85 and Council directive 91/439/EEC and repealed directive 76/916/EEC (Directive 2003/59/EC, p. 1). With the new directive the European Union established

"[...] the obligation to hold an initial qualification and to undergo periodic training [...], which is intended to improve road safety and the safety of the driver [...]. Furthermore, the modern nature of the profession of driver should arouse young people's interest in the profession, contributing to the recruitment of new drivers at a time of shortage" (Directive 2003/59/EC, (5), p.2).

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

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

Directive 2005/36 for the mutual recognition of Professional Qualifications, made provisions whereby professionals qualified in one (home) Member State can seek professional recognition of their qualifications in another (host) Member State for the purpose of practising their profession in that host Member State. This directive applies only where the profession is regulated in the host Member State i.e. where the practice of the profession is confined by law, regulation or administrative procedure to persons who hold specific qualifications, or registration/recognition from a specific competent authority or professional body (Department of Education and Skills). In June 2011 the European Commission has released a Green Paper on a revised Directive on the Recognition of Professional Qualifications; this formal consultation process – already closed – should lead to a new Directive on the Recognition of Professional Qualifications to be proposed by the European Commission in December 2011.

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

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

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

- In the Lisbon Strategy (2000) the European Union has committed to become the “most competitive and dynamic knowledge-based economy in the world”, capable of sustainable economic growth with more and better jobs and greater social cohesion (Lisbon Strategy⁴). Therefore the development and enhancement of high quality vocational education and training was a crucial and integral part of this strategy.
- With the Copenhagen declaration (2002) the European Commission established the European dimension of vocational education and training including the mutual recognition of qualifications and competences.
- The Maastricht communiqué (2004) was built upon the Copenhagen declaration and established action plans at national level to increase investment in VET and to increase flexibility of VET systems, to better react on labour market needs. These goals also were confirmed in the
- Helsinki communiqué (2006) the European Commission decided to draw attention on initial vocational education and training in order to reduce youth unemployment rates in European Member States.
- The Bruges communiqué (2010) states the view that national VET systems need to be connected to the wider world in order to remain up-to-date and competitive.

Especially when concerning that the road freight transport represents 47% of the freight transport (sea: 41%; 8% rail transport; 4% river transport⁵) in Europe and contributes with 7% to the European GDP it becomes obvious

⁴ Cf. <http://www.bka.gv.at/site/4913/default.aspx> (04.01.2012).

⁵ Romanian Association for international Road Transport. Online: http://crib.mae.ro/upload/docs/6095_artri_art_sec.pdf (04.01.2012).

that a better quality, enhanced mobility and a better image of professional drivers are important issues for the European Union. This is even more important when reflecting a Manpower study from 2010 which rank drivers in 23 out of 36 countries worldwide under the top 10 jobs that are difficult to fill (Manpower 2010). Therefore the directive 2003/59 cannot be seen isolated from this wider political strategy of the European Union.

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

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

In **Austria** directive 2003/59/EC was legally anchored in 2008 in the Federal Law Gazette (BGBl II Nr. 139/2008) issued by the Federal Ministry for Transport, Innovation and Technology. Although the nine provinces are responsible for the implementation of the directive. Austria has chosen the test-only option for the initial qualification and all truck drivers who received their license after 9 September 2009 have to complete the initial qualification and periodic training. The three-year apprenticeship training in professional driving exists in parallel, but those passing the final apprenticeship exam also receive the initial qualification for the Certificate of Professional Driving (CPC), marked with Code 95 in the driving license.

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

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

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

In the **Netherlands** a compulsory training for road transport drivers was introduced in 1975 in order to improve driver quality and driver skills. As a result each truck driver operating a truck with a total laden weight over 7.7 tonnes must hold a CPC, a certificate of professional competence. For the implementation of the directive the Ministry of Transport, Public Works and Water Management is responsible. The measures of the directive were integrated in the existing system and the directive was legally implemented with the Regeling Rijbewijzen (Driving

License regulation). The Netherlands also have chosen the test-only option for the initial qualification which is issued with Code 95 in the driving license.

Spain legally anchored the directive in national law with the Royal Decree 1032/2007. Before Spain had a three-folded system for achieving the driving licenses: C/C1 as a first step, C1+E and C+E licence in a second step and the ADR-certification in a third step. After completing the first step it was also possible to advance directly to step 3. The implementation of the directive and its initial qualification has led to a new certificate in Spain the "Certificado de Aptitud profesional", to be obtained after training and test options with 140 or 280 hours of training. Through the implementation of the directive a structured training system for drivers was implemented, although it is not completely integrated in the general Spanish professional training system and the National Qualifications Framework.

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

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

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

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

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

The first element of the SWOT-analyses are the strengths of the directive, what works well from both the view of relevant stakeholders, policy makers, training providers and the view of drivers to whom the directive is addressed. Leading questions are here 'what are the advantages of the directive', 'what do stakeholders perceive as strengths', 'what factors support the use of a directive'? In a next step the weaknesses of directive 2003/59 are investigated; here the leading questions are 'what does not work well', 'what could be improved', 'what should be avoided', 'what do stakeholders perceive as weakness'? From the investigation of strengths and weaknesses the analysis proceeds in identifying the opportunities, which includes any favourable condition that could improve directive 2003/59. When analysing the opportunities it is useful to consider the strengths and ask whether these open up any opportunities? Other questions to be addressed 'are there any changes in policy related to vocational education and training', 'are there changes in social patterns, occupational profiles'? The final element of the SWOT-analysis is the identification of threats⁶. It has to be considered that a strength could at the same time mean a weakness viewed from a different perspective and that each weakness could at the same time represent an opportunity. Leading questions to identify the threats are 'what obstacles are occurring', 'are quality standards / job profiles changing', 'are there any weaknesses that seriously threaten the directive'? ⁷

In the following table the general strengths, weaknesses, opportunities and threats identified in the implementation of directive 2003/59 in the investigated countries are listed. This SWOT-analysis is based on several interviews with relevant stakeholders and case studies derived from them. This list is not exhaustive and can be continuously expanded.

⁶ For external views this could be enriched by a PEST-analysis (Political, Economic, Socio-cultural and Technological environment).

⁷ Cf. http://www.mindtools.com/pages/article/newTMC_05.htm (05.01.2012).

Strengths	Weaknesses
<ul style="list-style-type: none"> • Room for interpretation, measures of directive can be adopted to national context • addressing and aligning differences in vocational education and training programmes / requirements in EU Member States • developing and setting-up a minimum standard for initial and periodic training requirements • harmonising educational policies for drivers within the European Union • improving the image of drivers: drivers receive a certain level of vocational education and training • consultation processes during implementation: participation of relevant stakeholders, experts, ministries of Transport, chambers of commerce, unions etc. to meet the needs of the sector / branch • the directive introduced a system of training that already existed before in some countries / larger companies. Now also smaller and medium sized companies are forced to incorporate driver training into working practice. BUT it must be considered that this depends very much on the quality of the implementation of the directive in national law • increasing number of people following courses • increasing number of training providers • considering soft skills (communication or interpersonal skills). The directive refers to these skills with the "ability to adopt behavior to help enhance the image of the company". 	<ul style="list-style-type: none"> • Character of a directive leads to different modes of implementation and a general lack of comparability • Intended objectives cannot be approached with a top-down-approach • Not enough participation of relevant stakeholders when developing and implementing directive 2003/59 • Ownership of directive is not among professionals (drivers and employers) • At national and regional level: different responsible authorities (national governments, provincial governments); comparability not even within one country • At government level: Different responsible authorities (Ministry of Transport, Ministry of Education (share of responsibilities / conflict of responsibilities) • Initial qualification and periodic training are not learning outcome-oriented, but subject-oriented • CPC-qualification cannot be aligned to National, Sectoral and European Qualification Frameworks nor used for ECVET mobility • The CPC is not capable for implementing the job competently • Directive does not meet labour market needs and not yet has any impact on an increased road safety or increased drivers employability nor their quality • Test-only option does not include training, this does not lead to the expected outcomes. A kind of Status quo in most of the countries • Directive replaces training measures that worked well (e.g. Hungary). Now these measures are replaced by the measures set in the directive • different training measures even within one country (federalism) • Different deadlines for the directives' implementation in the countries, and often no mutual recognition of these deadlines • Expected training hold-up, until the very end of deadlines • old driving licences issued before a certain date have been automatically converted in CPCs without completing initial qualification • current training is not the best option to achieve more professionalisation and it is not adjusted to the real needs of the professional drivers • saving of costs by conducting training mostly theoretical, too much room for interpretation • Trend to cheaper prices for training at cost of quality (mostly theoretical training, more practical training is needed) • most interviewed experts, drivers, employers etc. perceive the new rules set by the directive as an additional burden / hindering obstacle without real benefit • expected driver shortage could increase, because of the directive. E.g. seasonal drivers, career changers now face an additional obstacle to enter into this occupation • Directive does up-to-now not lead to more comparability between the training of drivers within the EU; different requirements in countries • significant differences in the application of the directive among the European countries • For addressing issues like road safety, drivers' shortage the directive can just be a starting point • Directive does not answer 'How to deal with the missing learning culture in the sector?' • Measures in the directive have no impact on geographical mobility of drivers in Europe

Opportunities	Threats
<ul style="list-style-type: none"> • aligning differences in vocational education and training in Europe • set a minimum standard for driver qualification • achieving the knowledge, skills and competences necessary to perform competently the profession by using learning-outcomes-approach • better comparability of training for drivers • by using learning-outcome orientation the directive could improve transparency, comparability and recognition of knowledge, skills and competences of drivers within the European Union • better and more holistic integration of the views of Industries and other stakeholders / experts with regard to knowledge, skills and competences necessary to compete in the labour market • adequate training for all drivers, mutual recognition of the qualification achieved in another Member State • increasing number of qualified drivers • increasing mobility of newly trained professionals from other European countries • other European policies (Life Long Learning, EQF, ECVET) should be considered and the directive could be linked to these instruments 	<ul style="list-style-type: none"> • missing training infrastructure (e.g. Poland), obligation to set-up a new, adequate training infrastructure, because of directive • training infrastructure available is often inadequate (e.g. Driving Schools); often quality suffers • different costs of training measures in the Member States = distortion of competition • no effects on enhanced mobility of the professionals • Directive up-grades the qualification of professional drivers, but nearly no career opportunities in the investigated countries • implementation differs from Member State to Member State due to the character of a directive. Therefore the directive itself raises differences across Europe, because of different interpretations • very different approaches to handle the directives implementation even within one country • often well trained drivers have no added value for companies (raises salaries etc.), they are not requiring vocational education and training • often employers and drivers are not interested in more comparability of their professional standards, because they are not supposed to work abroad • training does not lead to more professionalisation in some countries • general lack of information in the investigated countries with regard to the directive and a trend to wait to the very last moment with initial qualification and periodic training • Since in most of the investigated countries drivers are responsible for paying their CPC there is in dispute, if the directive will lead to an increase in driver employability • other EU countries do not recognise parts of periodic training completed in another European country • in some countries hard struggle to reach the status of professional drivers (skilled-worker-certificate). Directive is a kind of step backwards since the requirements for CPC are far lower than for the skilled-worker-certificate • Apprenticeship training could decrease, because the CPC is an easier and faster way to start working as a driver than 3-year apprenticeship training • directive (top-down-approach) does not follow a vocational education and training approach and pedagogical considerations but rather an administrative approach; therefore the quality is the challenge • drivers and employers agree that CPC is no measure against driver shortage • Quality as a crucial aspect of success

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

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

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

(5) Thresholds and Chances of Directives

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

Directives are an important means to harmonise different policies within the European Union, with directive 2003/59 a step to enhance the comparability and mutual recognition of the qualification of professional drivers in Europe was set. But since the directive is a directive and no regulation Member States have much room for interpretation. It can be seen in the country analyses that in some countries implementation worked well and the new structures were integrated in the existing structures in an efficient way, but in others it have led to a kind of status quo. Since the directive leaves much room for interpretation to the countries, our research show that the directive does not yet have an effect on more comparability of driver qualification levels at European and not even on national level. It is even questioned by the consulted experts, if the directive has an impact on drivers' actual abilities. Some of the experts stated that the needs of the branch would have been better met when introducing a regulation with a more binding character. The assumption that standardised vocational education and training will lead automatically to more comparability and therefore more mobility cannot be confirmed. Our research shows, that there is no real want of drivers to be more mobile than they already are, and there is hardly any motivation to seek work in another European country. Although in some countries, for example Austria, third country drivers are already an important resource to maintain road freight transport. The general lack of a "learning culture" in the

branch both from the side of the drivers and the side of employers and hardly no career opportunities are other obstacles that cannot be solved with the measures set in the directive.

Directive 2003/59 provides in annex I the minimum qualification and training requirements defined by a list of subjects. This is a rather input than output-oriented approach and does not include a learning-outcome based description of knowledge, skills and competences achieved through the training and it does not support the recognition of learning-outcomes achieved at the workplace since every driver has to complete the training modules regardless, if he/she is already able to apply his/her knowledge. By adapting the list of subjects with certain learning-outcomes to be achieved, directive 2003/59 could be improved and it would be an important step in order to approach more comparability of drivers' qualification in Europe. Another advantage of a learning-outcome-based approach is that it then would be possible to align CPC to NQFs, SQFs and EQF. There are some countries that already have finalised their NQFs, for instance the Netherlands, Spain, France and the UK, although referencing is not yet completed and it is still unclear, if CPC will be referenced. Austria and Germany not yet have finalised their NQFs, but it can be expected that apprenticeship-training in professional driving and the CPC will be referenced to different levels, if it will be referenced at all. Since the level of knowledge is an important wage indicator, it can be assumed that this might also affect salaries of drivers, although it is too early to draw conclusions on that⁸.

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

(6) Conclusions and recommendations

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

One general problem when introducing directives seems to be that most countries transpose them into national legislation by just providing what the directive prescribes. Although there is room for interpretation most countries do not make use of it and this leads to low quality since it is too less integrated into the national context and vocational education systems. Therefore it occurs that directives attempting to harmonise VET might open parallel tracks to existing systems instead of linking old and new requirements in an efficient manner. Since directives follow a top-down-approach the ownership of the contents and implementation strategies is in most countries not with the respective target group, this leads to the rejection and perception of the directive as an additional burden. Directives do not impose on the Member States a specific manner of implementation, therefore countries choose very different approaches and this can lead to more confusion than transparency. Most interviewed experts recommended to more consider national VET-schemes and increase involvement of national experts on VET before and during the development of directives. This does not only apply to the development of directives, but also when directives are implemented in a country. When, for example, national legislation foresees the involvement of social partners when defining new qualifications, this should also be considered when implementing directives. The Netherlands for example have legally established that employers, employees and

⁸ This point will be further investigated!

educational institutes are equally involved when developing new qualifications. Hence, a sustainable structure that facilitates and bridge the collaboration between social partners and education on regional, national and European level should be considered when introducing directives.

One main objective of directives in the field of (vocational) education and training is to contribute to more comparable and mutual recognisable qualification requirements. The EQF-approach with its learning-outcome-based descriptions of knowledge, skills and competences could facilitate the process of harmonising European vocational education and training policies. Important for future directives in the field of vocational education and training would be to first describe the expected outcomes of a directive in a learning-outcome-based way and second to align the respective qualification to National and European Qualification Frameworks. Then a real comparability and more transparency could be guaranteed. This is also important when considering the wider educational policy context of the European Union - in which most of these directives are embedded - which aims at becoming the "most competitive and dynamic knowledge-based economy in the world", capable of sustainable economic growth with more and better jobs and greater social cohesion (Lisbon Strategy) and to establish a European dimension of vocational education and training including the mutual recognition of qualifications and competences (Copenhagen declaration).

List of references:

- The Bruges Communiqué (2010) on enhanced European Cooperation in Vocational Education and Training for the period 2011-2020. Online: http://ec.europa.eu/education/lifelong-learning-policy/doc/vocational/bruges_en.pdf (04.01.2012).
- Copenhagen-Declaration (2002): Declaration of the European Ministers of Vocational Education and Training, and the European Commission, convened in Copenhagen on 29 and 30 November 2002, on enhanced European cooperation in vocational education and training. Online: http://ec.europa.eu/education/pdf/doc125_en.pdf (04.01.2012).
- Department of Education and Skills: Mutual Recognition of Professional Qualifications. Online: <http://www.education.ie/home/home.jsp?pcategory=17216&category=28966&language=EN> (18.11.2011).
- Directive 2005/36/EC of the European Parliament and of the Council on the Recognition of Professional Qualifications. Online: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2005:255:0022:0142:en:PDF> (18.11.2011).
- Directive 2003/59/EC of the European Parliament and of the Council on the initial and periodic training of drivers of certain road vehicles for the carriage of goods or passengers. Online: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32003L0059:EN:HTML> (18.11.2011).
- Directorate-General for Internal Policies. Policy Department B: Structural and Cohesion Policies (2009): Shortage of qualified personnel in road freight transport, p. 101. Online: <http://www.trt.it/english/Schede-progetti/European-parliament/Shortage.pdf> (27.01.2012).
- Eurim Briefing: EU Consultation Practices and Principles, No 26, May 1999
- Eurojargon. Online: http://europa.eu/abc/eurojargon/index_en.htm (27.01.2012).
- Europa – Summaries of EU Legislations: Directives.
- Online: http://europa.eu/legislation_summaries/institutional_affairs/decisionmaking_process/l14527_en.htm (14.11.2011).
- European Trade Union Confederation (ETUC): The European Unions Lisbon Strategy. Online: <http://www.etuc.org/a/652> (04.01.2012).
- The Helsinki Communiqué (2006) on Enhanced European Cooperation in Vocational Education and Training. Online: http://www.cedefop.europa.eu/EN/Files/helsinkicom_en.pdf (04.01.2012).
- Manpower (2010). Talent shortage survey results 2010. Online: <http://www.manpower.com/research/>. (04.01.2012).

- Maastricht Communiqué (2004) on the Future Priorities of Enhanced European Cooperation in Vocational Education and Training (VET). Online: http://ec.europa.eu/education/news/ip/docs/maastricht_com_en.pdf (04.01.2012).
- Ministry of Transport, Public Works and Water Management in the Netherlands (2010): Evaluation Report of the Directive 2003/59.
- Mitraszewska, Izabella/Nowacki, Gabriel/ Kaminski, Tomasz (2008): Professional Drivers' Labour Market in Poland according to directive 2003/59. Paper presented on the 8th International Conference "Reliability and Statistics in transportation and communication – 2008".
- Online: http://www.tsi.lv/Research/Conference/RelStat_08/Proceedings/27.pdf (18.11.2011).
- Official Journal of the European Union C83, Volume 53, 30 March 2010, Part 6, Title I, Chapter 2, p. 171.
- Online: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2010:083:FULL:EN:PDF> (14.11.2011).
- Recommendation of the European Parliament and of the Council on the establishment of a European Credit System for Vocational Education and Training (ECVET). Online: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2009:155:0011:0018:EN:PDF> (18.11.2011).
- Recommendation of the European Parliament and of the Council on the establishment of the European Qualifications Framework for lifelong learning. Online: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2008:111:0001:0007:EN:PDF> (14.11.2011).
- Romanian Association for international Road Transport: International Road Freight Transport. Online: http://crib.mae.ro/upload/docs/6095_artri_art_sec.pdf (04.01.2011).
- RSA: Consultation – Driver Certificate of Professional Competence.
- Online: http://www.rsa.ie/Documents/Road%20Safety/Consultations/CPC_Consultation.pdf (14.11.2011).

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For further information on the paper please contact:

tanja.bacher@3s.co.at