

Revision of the Directive on Driving Licences

The European Tyre and Rubber Manufacturer's Association (ETRMA) welcomes the revision of the Directive on Driving Licences, which provides an excellent opportunity to promote an increasingly eco-friendly and safe driving behaviour on the European roads. The tyre industry has already reflected upon this need when contributing to the evaluation of the existing rules back in 2019. In the past, tyre industry has also worked closely with the European Commission to establish the Third Driving Licences Directive¹, which recognised the importance for drivers to understand the fitting, correct use and care of tyres. Now, the time has come to update these rules and raise the bar higher in terms of drivers' awareness on the importance of driving in a fuel-saving way supporting the Green Deal's and Smart and Sustainable Mobility Strategy targets. In particular, the higher penetration rate of electric vehicles will further help to relief exhaust emissions and increase knowledge of driving distance in relation to energy consumption.

To this respect, **ETRMA recalls for a reinforced focus on eco-friendly driving practices in the driving licence training requirements by concretely updating the ANNEX II, Theory Test, point 2.1.2.**

The European Tyre Industry supports the transition towards low- and zero-emission vehicles and is committed to contributing to the challenge of decarbonization of road transport. Tyres are the only contact points between the vehicle and the ground which make them crucially important to ensure safety. Beyond this essential function, tyre design can contribute to the reduction in fuel consumption and CO₂ emissions. The tyre industry is constantly innovating to enhance tyre performances in an integrated approach by considering both safety and environmental performance requirements and by taking into account the trade-off between these. At the same time, next drivers' generations need to receive obligatory training in order to ensure sufficient knowledge for using and maintaining the tyres in the most efficient way possible.

A holistic approach will help not only to address the environmental challenges, but also to ensure safe behaviour when using the new complex semi-automated vehicles. Adapting the driving style to lower energy consumption, reduces tread abrasion and release of tyre and road wear particles² (TRWP) and enhances safety. To this end, ETRMA asks the following elements to be included.

- Considering paragraph 2.1.9 and 9.3.2 of Annex II on Minimum Requirements for Driving Tests as well as paragraph 1.8 of Annex IV on Minimum Standards for Persons who Conduct Practical Driving Tests of Directive 2006/126/EC on driving licences, ETRMA proposes to further promote rules on eco-friendly driving style. Requirements in the driving license curriculum need to be reinforced regarding the right vehicle operation such as the environmental consequences of speed, linear and radial acceleration, frequency and extent of braking and cornering. Tests have shown² that the main part of tyre wear is caused by lateral and longitudinal acceleration, therefore with a smooth and anticipatory driving style tyre wear can be reduced significantly.
- Make eco-friendly driving an integral part of the driving licence exam (written and/or practical) for all vehicle categories. While *paragraph 9.3.2 of Annex II of Directive 2006/126/EC* mentions the importance of *"Driving economically and in an environmentally friendly way, taking into account the revolutions per minute, changing gears, braking and accelerating"*, this is only applicable to categories BE, C, CE, C1, C1E, D, DE, D1, D1E while candidates for category B are not taken into account.

¹ <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32006L0126>

² <https://www.tyreandroadwear.com/>
<https://www.tyreandroadwear.com/wp-content/uploads/2021/12/20210614-ETRTO-Abrasion-Test-for-TireTech2021.pdf>

- Ensure drivers have the right basic knowledge to optimise tyre use and maintenance (how to adjust tyre pressure, importance of correct wheel alignment and balancing, use of appropriate tyre type for the weather season, etc.).
- Concretely include knowledge about the EU Tyre Label in the driving licence training. The new label, applicable as of 1st May 2021, includes the same three classification as before. However, the classes in wet grip and fuel efficiency are renewed to be similar to those of other household appliances. The empty classes are removed, and the scale is from A to E. In addition, there is a new way of marking noise class with letters from A to C, but the decibel level remains as earlier. Via new label's QR code the drivers will be able to get access to the European Product Registry for Energy Labelling (EPREL) database and retrieve corresponding tyre information.

All in all, the above-mentioned updates will meet simultaneously the dual goal of increased safety and environmental relief of the vehicle use. In the near future, the lessons and examinations in driving schools, as well as the driving license requirements, will also need to address the rapid evolution of mobility solutions, such as the higher deployment of automated functionalities in the vehicle leading to upcoming connected and automated driving.