



**CONSULTATION ON FURTHER EUROPEAN  
CHANGES TO DRIVING LICENCES AND  
DRIVING TEST REQUIREMENTS**

**Synopsis of Consultation Responses,  
Department's Response and Next Steps**

**October 2013**

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# **CONSULTATION ON FURTHER EUROPEAN CHANGES TO DRIVING LICENCES AND DRIVING TEST REQUIREMENTS**

## **Synopsis of Consultation Responses, Department's Response and Next Steps**

### **1. CONTACTING THE DEPARTMENT**

This document sets out the synopsis of the responses, Departmental response and next steps in relation to the Department's consultation on changes to Directive 2006/126/EC (the 3<sup>rd</sup> Directive) which introduces changes to driver licensing and the vehicles that can be used to take the driving test.

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### **2. EXECUTIVE SUMMARY**

This report concerns decisions made following the recent consultation on further changes that the European Commission ("EC") is making to European legislation. Directive 2012/36/EU (the amending Directive) makes changes to Directive 2006/126/EC (the 3<sup>rd</sup> Directive) which was implemented on 19 January 2013 and affects driving licences, driving tests and the vehicles that can be used to take the driving tests.

The Department of the Environment (the Department) and the Driver and Vehicle Agency (DVA) will implement the changes.

The consultation on the amending Directive ran for a period of 8 weeks, from 9 August to 4 October 2013, and was published on the Department's website

at: <http://www.doeni.gov.uk/index/information/foi/recent-releases/publications-details.htm?docid=9314>

This consultation followed the issue of the Great Britain (GB) consultation on the amending directive by the Driving Standards Agency (DSA) on 15 July 2013.

In total, 6 consultees responded. Four respondents had no substantive comments. The remaining two provided the same response to both the Northern Ireland (NI) and the GB consultations.

The DSA consultation received 339 responses. In deciding the way forward we have considered the comments received in Britain and liaised with the Department for Transport and DSA because, as one Member State with mutual recognition of driving licensing between NI and Britain, we need to ensure consistency between the licensing systems in both jurisdictions unless there are particular reasons to deviate.

An analysis of the results is provided below in section 7.2 headed 'Responses to the Consultation Exercise'.

The proposed changes set out in the amending Directive are as follows:

- updating the list of codes that are put onto driving licences to show driving entitlements and restrictions for the new vehicle categories introduced by the 3<sup>rd</sup> Directive, for example for medical reasons;
- allowing a tolerance of 5cc below the minimum specified engine size for motorcycles that can be used for the test (categories A1, A2 and A);
- reducing the minimum engine power requirement for medium motorcycles used for the driving test (category A2);
- raising the minimum engine power requirement for large motorcycles used for the driving test (category A);
- introducing a minimum, mass weight requirement, for category A motorcycles used for the driving test (category A);
- changes to the test for non-professional medium sized lorry drivers (category C1) as shown on the licence by a new restriction code;
- removing the need for 8-forward gear ratios for large test vehicles (category C);
- allowing persons who hold a manual entitlement in either category B, BE, C, CE, C1, C1E, D, D1E, to be allowed to take their large vehicle test (categories C and D) in an automatic vehicle but gain a manual driving licence entitlement.

Not all of the changes within the amending Directive were consulted on, only those changes where the United Kingdom (UK) has a choice about whether or not to implement them and from what date. The changes to minimum test vehicle standards for motorcycle driving tests (bullet points 2-5 above) were therefore not consulted on.

The proposal to update the list of codes that are put onto driving licences was not consulted on as NI took the opportunity to make these changes at the time

of implementing the 3<sup>rd</sup> Directive as it did not require any change to the legislation.

The changes consulted on were as follows:

- changes to the test for non-professional medium sized lorry drivers (category C1) as shown on the licence by a new restriction code;
- removing the need for 8-forward gear ratios for large test vehicles (category C); and
- allowing persons who hold a manual entitlement in either category B, BE, C, CE, C1, C1E, D, D1E, to be allowed to take their large vehicle test (categories C and D) on an automatic vehicle but gain a manual driving licence entitlement.

### **Change to 3<sup>rd</sup> Directive Implementation**

An additional change which will allow drivers with a car licence to drive three-wheeled vehicles was also consulted on. This option was offered in the 3<sup>rd</sup> Directive and was taken up in other Member States, but not by the UK. The change is:

- allowing drivers who hold a full category B (car) licence to be able to drive three-wheeled vehicles above 15KW power rating, within the UK, provided that they are at least 21 years of age.

### **Implementation Timetable**

As this is a European Union (EU) Directive, there is a requirement for Member States to have the legislative provisions in place by 31 December 2013, apart from the changes that relate to large motorcycles which do not have to be implemented until 31 December 2018.

Having taken into consideration the views received during the consultation process, the Department proposes to proceed with amendments to the Motor Vehicles (Driving Licences) Regulations (NI) 1996 which will implement the changes as outlined above.

### **3. BACKGROUND**

When the 3<sup>rd</sup> Directive was agreed by the EU in 2006, it made changes to vehicles and vehicles categories. For example, it introduced a new EU category for mopeds (category AM) and moved three-wheelers from category B1 (sub-category of car) into motorcycle categories and introduced new categories on the understanding that the annexes in the 3<sup>rd</sup> Directive would need revising at a later date. It is the annexes where details can be found about:

- the content and delivery of driving tests;
- the specifications of vehicles that can be used for driving tests – known as minimum test vehicle requirements (MTV's);
- medical requirements that drivers must meet, such as eyesight and declaring any disabilities; and
- restriction codes that show what driving licence entitlements drivers hold and whether they are limited to only driving vehicles in certain circumstances, such as only being able to drive automatic vehicles.

The 3<sup>rd</sup> Directive had to be fully implemented in all Member States of the EU by 19 January 2013. The EC agreed some further amendments to the 3<sup>rd</sup> Directive in November 2012 to update annexes to reflect the changes in vehicle categories and licensing agreed in 2006. There was not enough time between the amendments being agreed in November 2012 and the 3<sup>rd</sup> Directive implementation date of January 2013 to enable the UK to make all of the changes at once, especially as the UK needed to consult stakeholders on some of those changes. This consultation concerned those amendments agreed in November 2012.

#### **Three-wheeled Vehicles**

The 3<sup>rd</sup> Directive requires that three-wheeled vehicles now fall within the motorcycle rather than the car category for driver licensing purposes, and so provisional licence holders obtaining licences after 19 January 2013 must pass a test on a motorcycle to gain three-wheeled vehicle entitlement. However, the Directive offered Member States the option of allowing drivers who hold a full category B (car) licence to be able to drive three-wheeled vehicles above 15KW power rating, within their own territory, provided that they are at least 21 years of age. This option was not taken up by the UK at the time, but other Member States did. A question was asked in the consultation to find out if drivers feel that it is a good idea for the UK to take up this option.

Longer term, the UK continues to push the EU for the return of three-wheeled vehicles to category B1.

### **4. APPLICATION WITHIN THE UNITED KINGDOM**

The Secretary of State for Transport has responsibility for driver training, testing and licensing in Britain. The DSA, an executive agency of the

Department for Transport (DfT), is responsible for driving tests within Britain and for introducing the new requirements concerning the training and testing processes that underpin the upgrading of driving licence entitlements. The Driver and Vehicle Licensing Agency (DVLA) is responsible for all matters to do with the security and issuing of driving licences, including any restrictions.

Legislative responsibility for driver training, testing and licensing within NI is devolved to the Department under the Northern Ireland Act 1998. The DVA, an executive agency of the Department, is responsible for driving tests within NI and for introducing the new requirements concerning the training and testing processes that underpin the upgrading of driving licence entitlements. DVA is also responsible for all matters to do with the security and issuing of driving licences.

In deciding the way forward we have considered the comments received in Britain and liaised with the Department for Transport and DSA because, as one Member State with mutual recognition of driving licensing between NI and Britain, we need to ensure consistency between the licensing systems in both jurisdictions unless there are particular reasons to deviate.

## **5. WHY IS GOVERNMENT INTERVENTION NECESSARY?**

Driving tests, the vehicles used for driving tests and the holding of driving licences, is set out in European law and in domestic legislation. The Road Traffic (Northern Ireland) Order 1981<sup>1</sup> and the driving licence regulations<sup>2</sup> made under that Order apply. The changes required by the amending Directive will mean changes will need to be made to this legislation.

## **6. THE CHANGES**

The changes being introduced by the amending Directive and the 3<sup>rd</sup> Directive are shown in the following tables:

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<sup>1</sup> Road Traffic (Northern Ireland) Order 1981 [as amended]

<sup>2</sup> Motor Vehicles (Driving Licences) Regulations (Northern Ireland) 1996 SR No. 542 [as amended]

## 6.1 Changes not consulted on

<b>Changes Not Consulted On</b>	
<b>Amending Directive Changes: Motorcycles</b>	
<b>a</b>	Allowing a tolerance of 5cc below the minimum specified engine size for motorcycles that can be used for the test
<b>b</b>	Reducing the minimum engine power requirement for medium motorcycles used for the driving test
<b>c</b>	Raising the minimum engine power requirement for large motorcycles used for the driving test
<b>d</b>	Introducing a minimum, mass weight requirement for category A motorcycles used for the driving test
<b>Amending Directive Change: Update the list of Codes</b>	
<b>a</b>	Update the list of codes that are put onto driving licences to show driving entitlements and restrictions for the new vehicle categories introduced by the 3 <sup>rd</sup> Directive, for example for medical reasons.

As set out in the Executive Summary, not all of the changes within the amending Directive were consulted on, only those changes where the UK has a choice about whether or not to implement them and from what date. The changes to minimum test vehicle standards for motorcycle driving tests were therefore not consulted on.

The proposal to update the list of codes that are put onto driving licences was not consulted on as NI took the opportunity to make these changes at the time of implementing the 3<sup>rd</sup> Directive as it did not require any change to the legislation.



## 6.2 Changes consulted on

<b>Changes Consulted On</b>	
<b>Amending Directive Changes: Lorry and Bus Vehicles</b>	
<b>a</b>	Changes to the test for non-professional medium sized lorry drivers (category C1) as shown on the licence by a new restriction code
<b>b</b>	Removing the need for 8 forward gear ratios for category C (large goods) vehicles
<b>c</b>	Allowing those persons who take a lorry or bus test on an automatic vehicle to gain a manual entitlement for those vehicles, if they hold a manual entitlement in the following categories: B, BE, C, CE, C1, C1E, D, D1E
<b>d</b>	Allowing current holders of a large vehicle automatic licence to gain a manual entitlement when they exchange or renew their licence – subject to them holding a manual entitlement in the following categories: B, BE, C, CE, C1, C1E, D, D1E
<b>3<sup>rd</sup> Directive Change: Driving three-wheeled vehicles on a car licence</b>	
<b>a</b>	The 3 <sup>rd</sup> Directive requires that three-wheeled vehicles now fall within the motorcycle rather than the car category for driver licensing purposes, and so provisional licence holders obtaining licences after 19 January 2013 must pass a test on a motorcycle to gain three-wheeled vehicle entitlement. However, the Directive offered Member States the option of allowing drivers who hold a full category B (car) licence to be able to drive three-wheeled vehicles above 15KW power rating in their own territory, provided that they are at least 21 years of age. This option was not taken up by the UK at the time, but other Member States did. The Department wanted to know if drivers felt that it is a good idea for the UK to take up this option.

## **7. CONSULTATION EXERCISE**

The consultation, which was hosted on the DOE website, ran from 9 August to 4 October 2013. Targeted emails and letters were sent to interested parties and stakeholders associated with motorbikes, three-wheeled vehicles, lorries and buses (including coaches) to inform them of the consultation and inviting them to provide their views.

Overall, 6 responses to the consultation were received. The Department thanks all respondents for taking the time to consider the consultation and for providing their comments.

The organisational breakdown of the respondents was as follows:

- Representative Organisations: 4
- Police: 1
- Other: 1

Of the 6 responses received, 2 organisations - the Freight Transport Association (FTA) and the Road Haulage Association (RHA) - provided substantive comments on the proposals.

There were 339 responses to the GB consultation, from a variety of stakeholders including members of the public, private bus and lorry operators and/or trainers, industry representative groups, road safety groups and vehicle enthusiast clubs.

### **7.1 Consultation Questions**

#### **Lorry and Bus Vehicles**

- a. Do you agree that the Department should not introduce a new non-professional test for category C1?
- b. Do you agree with the Department's proposal to amend legislation so that candidates for the large vehicle (lorry) test are no longer restricted to using a vehicle with 8-forward gear ratios?
- c. Do you agree that drivers who have passed their large vehicle test on an automatic vehicle are given a manual licence instead of an automatic one, if they already hold a manual entitlement in another vehicle category such as car?

- d. Do you think that existing holders of automatic large vehicle licences should also be given a manual entitlement when they exchange their licence for any reason?

### **Driving three-wheeled vehicles on a car licence**

- a. Please say whether you agree that drivers of at least 21 years of age should be allowed to drive three-wheeled vehicle on a full car licence.

## **7.2 Responses to the Consultation Questions**

### **Lorry and Bus Vehicles**

- a. **Do you agree that the Department should not introduce a new non-professional test for category C1?**

#### **FTA Response:**

'FTA members unanimously support the Driving Standards Agency position in not adopting this particular change. The Association agrees that the introduction of this additional testing structure is likely to add cost and complexity to the existing testing systems.'

#### **RHA Response:**

'We agree that there is no need for a 'non-professional' test for driving licence Category C1.'

#### **The Department's Response:**

Both respondents to the NI consultation agreed that there was no need to introduce a non-professional test for category C1. The majority of respondents to the DSA consultation also agreed with this approach, although about 10% thought that a non-professional test would benefit those drivers who own motor homes because they could take the driving test in their own vehicles without having to have a tachograph fitted.

DSA is considering whether it might be feasible to permit candidates to attend for the test using their own vehicle without having a tachograph fitted. However, this would still require a restriction code to be put on their driving licence, which would almost certainly require costly system changes to the DVLA IT system.

In light of the responses received, the Department does not intend to introduce a separate non-professional C1 test, but will review this decision, should the situation in Britain change.

**b. Do you agree with the Department's proposal to amend legislation so that candidates for the large vehicle (lorry) test are no longer restricted to using a vehicle with 8-forward gear ratios?**

**FTA Response:**

'FTA supports the Driving Standards Agency position in adopting this particular change. FTA endorses the agency's findings in that it is becoming increasingly difficult and expensive to obtain a vehicle with an 8 forward gear ratio and a fully manual transmission system.'

**The Department's Response:**

We propose to amend the minimum test vehicle specification for category C in the Motor Vehicles (Driving Licences) Regulations (NI) 1996 to remove this restriction.

**c. Do you agree that drivers who have passed their large vehicle test on an automatic vehicle are given a manual licence instead of an automatic one, if they already hold a manual entitlement in another vehicle category such as car?**

**FTA Response:**

'With no clear member consensus regarding the adoption of this proposal FTA would ask that the agency consider the following points;

- FTA agrees with the agency that the emphasis is moving towards vehicles with semi-automatic transmission systems; however the reality remains that the many vehicles on our roads do involve gearing which requires some form of manual interaction.
- FTA does not agree that this change would have no impact on business costs as operators would be forced to retrain drivers who have only ever passed a category C or D test in an automatic vehicle.
- Lack of knowledge of manual gearing could impact road safety as driver with only automatic licences become distracted from safe driving as they familiarise themselves with the workings of the many types of transmissions available.
- Although training organisations may argue that these changes would represent a reduction in their operating cost, it could be viewed as a dilution of testing standards, standards which are designed to ensure road safety.

Should this change be adopted FTA believes that the benefits or otherwise must be reviewed to ensure that road safety has not been compromised.'

**RHA Response:**

'We would accept that drivers who now pass their vocational driving test on an automated transmission vehicle be given 'manual' entitlement provided they already hold this entitlement in a different licence category of motor vehicle.'

**The Department's Response:**

Having considered the two responses received to the NI consultation, and taking into account the additional responses received to the DSA consultation, the Department proposes to proceed with this change. Drivers will still be able to come to test in a manual vehicle, or opt to use an automatic vehicle. The choice will be for the driver to decide. The proposal is to accept the relaxation of the current rules regarding licensing entitlement following a driving test in an automatic vehicle as set out in the Directive. This will ensure that NI drivers are not disadvantaged when compared to those taking a test in Britain or other parts of the EU. We will monitor, together with DSA, any issues which emerge as regards industry cost and road safety, and review this decision if that proves to be necessary.

**d. Do you think that existing holders of automatic large vehicle licences should also be given a manual entitlement when they exchange their licence for any reason?**

**FTA Response:**

'Given the previous response FTA believes that this proposal should not be adopted.'

**RHA Response:**

'We would be concerned that existing vocationally licensed drivers tested on automated transmission vehicles being given 'manual' entitlement if they do not already hold 'manual' entitlement in a different licence category of motor vehicle.'

**The Department's Response:**

Having considered the two responses received to the NI consultation, and taking into account the additional responses received to the DSA consultation, the Department proposes to proceed with this change, which mirrors that proposed for new drivers and will require the driver to have manual driving entitlement for another category of vehicle. This will ensure that existing NI drivers are not disadvantaged when compared to those in Britain or other parts of the EU. We will monitor, together with DSA, any issues which emerge as regards industry cost and road safety, and review this decision if that proves to be necessary.

## Driving three-wheeled vehicles on a car licence

- a. Please say whether you agree that drivers of at least 21 years of age should be allowed to drive three-wheeled vehicle on a full car licence.**

There were no comments received in relation to this question. In Britain there was overwhelming support for this proposal, and it is proposed to introduce the change as outlined in the consultation paper.

## **7.3 Other Responses**

### **Office of the Commissioner for Older People for Northern Ireland:**

'Thank you for your correspondence of 9<sup>th</sup> August 2013 inviting this office to respond to the above consultation.

On this occasion, we are not submitting a detailed response to the consultation. However, we would be grateful if you would continue to include the office of the Commissioner for Older People for Northern Ireland in your consultation exercises'

### **Police Service of NI (PSNI):**

'On behalf of PSNI I would say that we feel that the suggested amendments would have no impact on policing enforcement issues. I would also comment that we welcome the general move to bring NI in line with EU requirements.'

### **Law Society NI:**

'The Society thanks the Department of the Environment for the opportunity to respond to the consultation in respect of the above matter.

Having considered the proposals, the Society has no comment to make at this time concerning any issues raised therein.'

### **Road Safety Authority (RSA):**

'The Driver Testing Section of the Road Safety Authority in the Republic of Ireland is currently in the planning stages of implementing those changes which affect the driving test in accordance with European Commission Directive 2012/36/EU, and we have chosen November 30<sup>th</sup> 2013 as our implementation date.

To this end, I would like to extend an invitation for you or any of your colleagues to contact me if you would like to know how we are implementing any of the items or if you have any specific questions on the measures being introduced, if you would find this of benefit.'

### **The Department's Response:**

The Department thanks all those who took the time to consider the consultation and provide a response.

## **7.4 Regulatory Impact Assessment Questions**

Given the limitations of the available evidence base it was not possible to monetise the costs and benefits of implementing the required changes. A full qualitative description of each of the costs and benefits was provided in a Regulatory Impact Assessment that accompanied the consultation paper and consultees were invited to submit any additional evidence that is available on the costs and benefits associated with making the required changes, as follows:

### **Minimum Test Vehicle Standards for Motorcycles**

1. Allowing a tolerance of 5cc below the minimum engine capacity, specified in the 3rd Directive for motorcycle test vehicle standards

Consultees were invited to submit any additional evidence that is available on any costs and benefits that would result from this change.

2. Reducing the minimum engine power requirement for medium sized motorcycles used for the driving test

Consultees were invited to submit any additional evidence that is available on:

- a) any costs and benefits that would result from this change;
- b) the assumption that candidates will continue using their existing motorcycles; and
- c) when a 20kw vehicle would become available.

3. Large motorcycles - changes to the minimum standards for vehicles used for the test:

- raising the minimum engine power requirement; and
- introducing a minimum, mass weight requirement, for large motorcycles (category A) used for the driving test.

Consultees were invited to submit any additional evidence that is available on:

- a) the costs to business from these changes;
- b) the difference in cost for trainers between motorcycles they currently use and motorcycles they will need to use come 2018;
- c) whether they consider that it is likely that this difference in cost will be significant;
- d) the number of vehicles meeting the new standards that trainers will need to purchase; and
- e) whether there would be a difference in vehicle emissions between a vehicle below 50kw and one above 50kw.



## Lorry and Bus Vehicle Changes

4. The Introduction of a New Type of Test for Non-Professional Medium Sized Lorry Drivers (Category C1) as Shown on the Licence by a New Restriction Code

Consultees were invited to submit any additional evidence that is available on:

- a) any costs and benefits that would result from this change.

5. Removing the need for 8 forward gear ratios for category C vehicles used for the large vehicle test

Consultees were invited to submit any additional evidence that is available on:

- a) the benefits to business from these changes;
- b) the difference in cost for trainers between vehicles with and without 8 forward gears;
- c) whether they consider that it is likely that this difference in cost will be significant;
- d) the number of relevant vehicles that trainers will need to purchase; and
- e) whether there would be a difference in vehicle emissions.

6. Allowing those persons who take a lorry or bus test on an automatic vehicle to gain a manual entitlement for those vehicles, if they already hold a manual entitlement in the following categories: B, BE, C, CE, C1, C1E, D, DE, D1E

Consultees were invited to submit any additional evidence that is available on:

- a) whether there would be any effect upon road safety;
- b) any benefits to business due to this change; and
- c) whether there would be any benefits to the environment due to this change.

## **Driving three-wheeled vehicles on a car licence**

7. The European 3<sup>rd</sup> Directive requires that three-wheeled vehicles now fall within the motorcycle rather than the car category for driver licensing purposes, and so provisional licence holders obtaining licences after 19 January 2013 must pass a test on a motorcycle to gain three-wheeled vehicle entitlement. However, the Directive offered Member States the option of allowing drivers who hold a full category B (car) licence to be able to drive three-wheeled vehicles above 15KW power rating, provided that they are at least 21 years of age. This option was not taken up by the UK at the time, but other Member States did. The Department asked if drivers feel it is a good idea for the UK to take up this option.

Consultees were invited to submit any additional evidence that is available on:

- a) any costs and benefits that would result from this change.

## **7.5 Responses to the Regulatory Impact Assessment Questions**

There were no comments received on any aspect of the Regulatory Impact Assessment.

## **8. NEXT STEPS**

The requirements of EC Directive 2012/36 must be transposed into national legislation by 31 December 2013.

Having taken into consideration the views received during the consultation process, the Department proposes to proceed with amendments to the Motor Vehicles (Driving Licences) Regulations (NI) 1996 which will implement the changes as outlined in the consultation paper. The changes being introduced are:

- allowing a tolerance of 5cc below the minimum specified engine size for motorcycles that can be used for the test (categories A1, A2 and A);
- reducing the minimum engine power requirement for medium motorcycles used for the driving test (category A2);
- raising the minimum engine power requirement for large motorcycles used for the driving test (category A) (will not take effect until December 2018);
- introducing a minimum, mass weight requirement, for category A motorcycles used for the driving test (category A) (will not take effect until December 2018);
- removing the need for 8-forward gear ratios for large test vehicles (category C);
- allowing persons who hold a manual entitlement in either category B, BE, C, CE, C1, C1E, D, D1 or D1E, to be allowed to take their large vehicle test (categories C and D) in an automatic vehicle but gain a manual driving licence entitlement; and
- allowing persons who already hold an automatic category C or D licence and a manual entitlement in one of the aforementioned categories automatically to gain a manual licence entitlement upon renewal, including the option to apply for upgrade prior to when their licence is due for renewal. If people wish to claim this upgrade they will need to exchange their driving licence with DVA Driver Licensing.

### **3-wheelers**

- allowing drivers who hold a full category B (car) licence to be able to drive three-wheeled vehicles with an unlimited power rating, provided that they are at least 21 years of age. Drivers will only be allowed to do this within the UK, in accordance with the EU legislation.

### **C1 leisure vehicles**

- We do not intend to introduce a separate non-professional C1 test, but will review this decision, should the situation in GB change.

### SUMMARY OF RESPONSES

A summary of the responses received to the consultation is shown below:

RESPONDENT	QUESTIONS ANSWERED	GENERAL VIEW / SPECIFIC POINTS MADE
Office of Commissioner for Older People for Northern Ireland	N/A	Acknowledged receipt of the consultation document but did not comment on the proposals.
Freight Transport Association (FTA)	Answered questions 3a, 3b, 3c and 3d, relating to lorry and bus changes only	<p>Agreed with the proposals:</p> <ul style="list-style-type: none"> <li>• not to introduce a new type of test for non-professional medium sized lorry drivers (category C1) as shown on the licence by a new restriction code; and</li> <li>• to remove the need for 8 forward gear ratios for category C vehicles used for the large vehicle test.</li> </ul> <p>Reported a mixed response to the proposal to allow persons who take a lorry or bus test on an automatic vehicle to gain a manual entitlement for those vehicles if they already hold a manual entitlement in the following categories: B, BE, C, CE, C1, C1E, D, DE, D1E. With no clear member consensus regarding the adoption of this proposal FTA asks that the following points be considered:</p> <ul style="list-style-type: none"> <li>• 'FTA agrees with the agency that the emphasis is moving towards vehicles with semi-automatic transmission systems; however the reality remains that the many vehicles on our roads do involve gearing which requires some form of manual interaction.</li> <li>• FTA does not agree that this change would have no impact on business costs as operators would be forced to retrain drivers who have only ever passed a category C or D test in an automatic vehicle.</li> <li>• Lack of knowledge of manual gearing could impact road safety as driver with only automatic licences become distracted from safe driving as they familiarising themselves with the workings of the many types of transmissions available.</li> <li>• Although training organisations may argue</li> </ul>

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		<p>that these changes would represent a reduction in their operating cost, it could be viewed as a dilution of testing standards, standards which are designed to ensure road safety.</p> <p>Should this change be adopted FTA believes that the benefits or otherwise must be reviewed to ensure that road safety has not been compromised.'</p> <p>Opposed the proposal to extend the manual entitlement to current holders of a large vehicle automatic licence as long as they hold a manual entitlement in another category (except motorcycles).</p>
Law Society of Northern Ireland	N/A	Thanked the Department for the opportunity to respond but had no comments on the proposals.
Police Service of Northern Ireland (PSNI)	N/A	Responded to say that the suggested amendments would have no impact on policing enforcement issues and welcomed the general move to bring NI in line with EU requirements.
Road Haulage Association Limited (RHA)	Answered questions 3a, 3c and 3d, relating to lorry and bus changes only	<p>Agreed with the proposals:</p> <ul style="list-style-type: none"> <li>• not to introduce a new type of test for non-professional medium sized lorry drivers (category C1) as shown on the licence by a new restriction code; and</li> <li>• Reported a mixed response to the proposal to allow persons who take a lorry or bus test on an automatic vehicle to gain a manual entitlement for those vehicles if they already hold a manual entitlement in the following categories: B, BE, C, CE, C1, C1E, D, DE, D1E.</li> </ul> <p>Raised concerns 'that existing vocationally licensed drivers tested on automated transmission vehicles being given 'manual' entitlement if they do not already hold 'manual' entitlement in a different licence category of motor vehicle'.</p>
Road Safety Authority (RSA)	N/A	Thanked the Department for the information on the consultation. Advised that the RSA is in the planning stages of implementing the changes, with an implementation date of 30 November 2013. An invitation was extended to the Department to contact RSA for information on the

## Appendix 1

		changes and/or on how the changes are being implemented in the Republic of Ireland.
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