



**ROYAL NORWEGIAN MINISTRY
OF TRANSPORT AND COMMUNICATIONS**

The Minister

European Commission - DG Mobility and Transport
BE-1049, Brussels
Belgium

Your ref

Our ref

Date:

14/1591-

05.11.2014

Competence to drive under winter conditions

During the winter period we experience serious challenges concerning the ability for heavy motor vehicles to navigate on Norwegian roads. The cold and changing climate combined with our topography and demography, makes driving in the winter particularly challenging. Heavy goods vehicles that are not sufficiently equipped for our roads and drivers that are inexperienced with winter driving conditions, represent a serious risk to road safety and a major impairment to the traffic flow.

The Norwegian government has already introduced several measures in an attempt to comply with the challenging situation. The number of road side inspections have been extended quite massively. Last winter, approximately four times the number of vehicles was checked, compared to the previous season. Requirements for winter tyres on all wheels of heavy motor vehicles, was introduced last year. As of 2015, these requirements will be extended to heavy trailers as well. Furthermore, comprehensive information towards foreign truck drivers on the challenges of driving during winter conditions, translated into several European languages, has been provided and widely distributed.

Norway has an extensive mandatory training for drivers of heavy vehicles, which includes thorough training to make the drivers skilled to handle challenging winter roads. However, the system of mutual recognition of driving licences and professional drivers qualifications within the Community implies that not all foreign drivers have the necessary competence to drive under these difficult conditions. Statistics show that foreign vehicles clearly are overrepresented in the number of vehicles that get stuck or slip on icy winter roads and lack of skills to drive under difficult winter conditions seems a major contributing factor in this respect.

Taking into account that we all have common goals in reducing the fatalities in road transport and securing efficient transport, it should be explored how to secure the necessary qualifications to drive under difficult winter conditions, not only for the countries that experience these incidents on their roads, but for all countries, especially since the transport business is a global business.

The Norwegian Ministry of Transport and Communications is eager to hear the Commission's views on the possibility to have specific requirements for competence for driving during winter

conditions, e.g in the form of requiring certain skills or competences when the driving conditions are especially challenging and there is a severe road safety impact. The ability to temporarily close down challenging roads for heavy vehicles during demanding weather conditions, and only allow trucks and drivers that comply with certain requirements as regards competence and technical requirements, is desirable. We emphasize that such requirements will apply both to national and EU-drivers, and is not intended as means to distort competition, but as means to secure equal competition between the transport companies. Norwegian authorities will take the necessary steps to establish a system to facilitate for foreign drivers to comply with such requirements, should this be an option.

Furthermore we are informed of the current revision of directive 2003/59/EC on initial qualification and periodic training of drivers on certain road vehicles that carry goods or passengers (CPC directive). In our view, modules on driving under difficult conditions as a part of the initial and periodic training in the CPC-directive would be a welcome initiative. Such an initiative should also include use and competence to use equipment, as for instance tyre chains. Assumingly, the introduction of modules on driving under difficult conditions in the professional driver training would increase the ability of more safe and secure driving under challenging circumstances. The Norwegian Public Roads Administration has made a draft proposal for a module which follows below.

A proposal for a module on driving under difficult road and weather conditions

Main goal:

In our opinion, the main goal of such a module should be to contribute making the professional driver well prepared to adapt his driving to difficult weather and road conditions to secure that the aims of the directive are achieved.

Training goals:

The driver should

- Be able to plan his driving with regard to visibility, road standards, road surface conditions, and the expectations of various traffic environments
- Be able to make the right decisions about adapting his driving and vehicle to the existing conditions, and to determine whether he should continue or cease driving
- Understand how conflicts of interest can be reduced by taking into account the needs and interests of other road user groups.
- Be familiar with the requirements for traction and securing traction using proper tyres and chains
- Be able to attach chains, and understand the hazards when attaching and driving with chains
- Know the vehicle's possibilities when it comes to steering, braking and traction under difficult road and weather conditions, including narrow, slippery and steep roads and winter conditions

Main items:

- Tyres; types, tread pattern, requirements and checks

- Chains; types, adjustment and repairs including the use of chain tongs
- Fuel efficient driving, foresight
- Use of the vehicle's electronic systems
- Proper operation of the automatic transmissions
- The importance of grip
- Swerve and overturn danger
- Loss of steering control
- Compensation for lost time
- Reflection on own driving and choices

Scope:

According to the 2003/59/EC the duration of the initial qualification must be 280 hours while the accelerated initial qualification must be 140 hours. Norwegian Module 6 Safe Behaviour on the Road includes 44 hours in the complete initial qualification, 24 hours in the accelerated one. In the periodic training this module includes 7 hours.

It is difficult to suggest a specific number of hours for the proposed module, but the time frame must be wide enough to allow for sufficient training in the relevant skills. In countries that have a system with tests only, these must be designed so that they generate necessary training.

Practical implementation:

Guidelines should specify requirements that lead to a good visualization of the different weather and road conditions the professional driver may encounter. This is particularly important for countries where such conditions are rarely or never seen in practice. It may be appropriate for the theoretical tests to include video clips from real situations for the candidate to consider. We have more faith in training and testing relating to real driving on the road, than in concentrated practice on a track.


Registration and monitoring of completed modules

We suggest that each country should register and keep records to check that the drivers complete the required parts of the initial qualification and periodic training. If all drivers are to remain free to drive in every EEA country, for road safety reasons all also should complete the necessary training.

Contact with other countries

The Ministry of Transport and Communications has at the same time addressed a letter on this topic to several other states, considered to might have similar challenges related to winter driving conditions.

Yours sincerely,



Ketil Solvik-Olsen

Copy: Norges EU-deligasjon i Brussel