



**REPORT N. ERA-REP-104-2013/INT
OF THE EUROPEAN RAILWAY AGENCY**

ON

*The development of the certification of train drivers in accordance with article 33 of Directive
2007/59/EC*

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0. Executive summary

This report and in particular the proposals in chapter 3 are based on the outcome of a questionnaire survey conducted in spring 2013 and on experiences the Agency gathered during 5 years of accompanying the implementation process in the Member States. In accordance with Article 33 of Directive 2007/59/EC (in the following referred to as TDD) the report provides an overview on the experiences made in the MSs as well as 21 proposals for improvement either indicating potential for increased efficiency of the certification scheme or highlighting a need to solve incoherence or to update a certain aspect. Proposals refer to the TDD or to related documents such as EC Regulation (EU) 36/2010, EC Decision 2010/17/EC, EC Decision 2011/765/EU and EC Recommendation 2011/766/EU.

Taking into account that this report is a very first evaluation of the implementation of the TDD, the need to adjust certain measures or requirements is, compared to the complexity of the system, relatively limited. However, regarding a few aspects, the system needs indeed further development or supplementation. Notwithstanding that proposals by their nature differ certainly in regard to significance, urgency or importance of the intended change, the Agency suggests to the Commission to follow a holistic approach addressing all the aspects listed, when considering the appropriate follow up activities.

Data and information gathered by the questionnaire survey refer to the reference date 31.03.2013. Following the phasing-in schedule of the TDD at that moment MSs were requested to care for certification of at least those train drivers who get driving authorisation for the first time and who have passed examinations for international services. Only till end of 2018 all train drivers must be certified under the new provisions. On this background the rate of 11% of drivers having in average already obtained a European licence is relatively high. On the other hand, the situation differs significantly from MS to MS. In some cases no licence has been issued by 31 March 2013, in others the certification rate is already beyond 50%.

Remarkable also the differences regarding fees taken by the authorities for different services linked to the certification scheme. While some MSs cover respective costs in frame of the general fees for infrastructure use, others have developed differentiated tariff system. The most 'expensive' licence is issued in Sweden where drivers (or their employer) pay 224 Euro.

Proposals for improvement in regard to the certification scheme in general

Several proposals of this group concern more formal aspects. They will not change the procedures and standards set by the certification scheme as such. But they are required to clarify for example the scope of application, which should be (re-)adjusted to the definition of scope of the RSD and the definition and use of specific terms. Furthermore, it is proposed to have a second evaluation report after the end of the implementation period end of 2018.

Two further proposals belong to this group: Art. 17 requests that RUs/IMs inform the NSA in case cessation of a work contract with a train driver. Purpose of this provision and handling of this kind of information within the NSA are unclear and require further analysis and appropriate amendment to clarify the situation. Finally the question of the geographic scope of validity of statements of recognition as well as of statements issued by persons or bodies recognised under the conditions of the TDD needs clarification. The certification scheme presumes a mutual acceptance of licences and certificates (within their defined scope of authorisation) on the one



hand but gives no clear indication regarding a mutual acceptance of recognitions provided under the conditions of the TDD on the other hand. May for example a doctor recognised by the NSA of MS A be accepted to examine train driver applicants in/from MS B?

Proposals for improvement referring to the licence

More than half of all proposals (11 proposals) refer to the licence. 7 of them concern different aspect of the medical or psychological fitness examination. Apart from some specific requirements for example regarding vision ability and cases requiring supplementing examination, some general weaknesses are addressed as well. The frequency of psychological testing must be clarified as well as it is proposed to evaluate the development of some common criteria for the recognition of doctors and psychologists. Furthermore it should be considered to care for guidance in respect to 'excluding diseases'. These are diseases which should exclude a train driver (or applicant) from passing the examination respectively from continuing driving trains.

Inconsistencies were found in regard to Article 11.1, which refers to a Council Decision repealed since several years, and in regard to Annex I of the TDD, in which the title of section 4 obviously seems to include a mistake, requiring correction.

More general proposals for improvements in this group propose to develop further harmonised criteria for examinations assessing the general professional competence required to obtain a licence (Annex IV of TDD), to consider provisions avoiding double issuance of licences and improvements concerning the licence register parameters.

Proposals for improvement referring to the certificate

In regard to the certificate, it is proposed to review the definition of categories, in particular of category A, and of the provision requiring the NSA to recognise persons or bodies for language training and assessment, taking into account that NSAs usually do not have the required competence for this task. Experiences show that also Article 4.2 on the exemptions regarding the obligation that a train driver, when driving a train, must be in possession of the respective authorisation for the rolling stock and the infrastructure – e.g. in training or examination situations – need a review aiming to extent the provision.

Furthermore there is evidence that certain specifications concerning the layout of the certificate as well as of the 'certified copy of the certificate' should be improved to better meet the needs in practice and in order to incorporate latest developments on the use of new technologies.

Finally, the description of train driver competences regarding rolling stock and regarding infrastructure on the certificate and in the registers (CCRs) is source of major concern in the sector. The level of detail and the method applied in this respect differ largely between MSs This is not only an obstacle for mutual recognition in case of cross border services but as well creates uncertainties and unacceptable differences concerning the effort to be taken in regard to the periodic checks provided for in Article 16 and Annex VII.



1. Introduction

According to article 33 of Directive 2007/59/EC on the certification of train drivers, hereinafter referred to as TDD, ERA shall evaluate the development of the certification of train drivers and shall submit a report to the European Commission containing improvements to be made to the system as regards:

- a) the procedures for issuing licences and certificates;
- b) the accreditation of training centres and examiners;
- c) the quality system put in place by the competent authorities;
- d) the mutual recognition of certificates;
- e) the adequacy of the training requirements specified in Annexes IV, V and VI in relation to the market structure and the categories mentioned in article 4(2)(a);
- f) the interconnexion of registers and mobility in the employment market.”

Furthermore, ERA should recommend measures regarding the theoretical and practical examination of the professional knowledge of applicants for the harmonised certificate for rolling stock and relevant infrastructure.

In order to collect the relevant data and experiences from the railway sector in regard to the implementation of the certification system, ERA has developed a questionnaire distributed to the sector organisations and the NSAs. On the side of the NSAs, the main focus was on the role and responsibilities in the certification system, they are indeed in charge of the licence, the recognition of persons and bodies and the general supervision. While the companies are in charge of the certificate, they were targeted for this part of the questionnaire. ERA received a high number of responses which allows ERA to use them as a major contribution to this report.

ERA did not limit itself to a written questionnaire even if the number and the quality of the answers were very high. Indeed, after having analysed these answers, ERA organised a workshop of two days in order to discuss the main outcomes and findings and to define in more details the main elements of improvement of the TDD.

In chapter 2 of this report, ERA summarised the positions expressed by all responding organisations while chapter 3 focuses on the proposals to improve the certification scheme of train drivers. Statistical information (number of train drivers, number of licences issued, etc.) are available in the annexes to this report.



2. Analysis of the implementation of Directive 2007/59/EC

The Analysis of the implementation of Directive 2007/59/EC is complementary to the evaluation of the transposition of this very same Directive. On one hand, the evaluation of the transposition is completely focusing on the national legal acts that enact the Directive into the national legal system and verifies its legal appropriateness. On the other hand, the analysis of the implementation has as an objective to gather practical experiences and concrete examples of the certification scheme of train drivers developed at a European scale. While the result of the evaluation of transposition might potentially be sanctions to a Member State for infringement, the result of the analysis of the implementation might be corrective and/or improvement measures proposed by the European Commission to change this Directive. This distinction is fundamental to understand the aim of this report which is to give certain orientations to improve the European legislation.

ERA has used two different channels to gather these practical experiences and concrete examples. Firstly, the Agency has developed a questionnaire on the main aspects of the certification scheme of train drivers. ERA received a high rate of answers as 24 NSAs or competent authorities and 18 stakeholders (representative organisations, companies, trade-unions) replied. The Agency has also organised a workshop on the 9th and 10th of October 2013 where the proposals for improvements based on respondents' answers have been discussed with around 30 participants.

At the time of the questionnaire, four Member States replied that either the legal act transposing the Directive was not yet approved at national level (Romania and Estonia) or that the licences were not yet started to be issued (Bulgaria and Slovenia). In Bulgaria, the procedure of issuance was under preparation while in Slovenia, they have not started to issue licences as they do not have international drivers (first phase described in Directive 2007/59/EC). In these Member States, the experience in issuing licences was then rather limited and the answers to the questionnaire incomplete.

2.1. Licence

2.1.1. General organisation of the licensing scheme

The questionnaire left the possibility to the respondents to develop on the problems they encountered related to the general organisation of the licensing licensing scheme. A broad variety of situations have been described in their answers.

The British NSA considers that the Regulation 36/2010 is not specific enough when stating that "other recognised documents proving identity" (if not a copy of passport or a national identity card) is a document to be provided in the frame of the application for a licence. For the British authorities, it is proving difficult to decide what other recognised documents could be sufficient for the sake of the licensing scheme.

The Dutch NSA would like the medical requirements to be taken out from the licensing scheme in order to have the possibility to distinguish between categories of drivers (high speed/shunting). On the other hand, the Italian NSA considers that an on-line management for the medical requirements updates would be more efficient.



The Danish NSA supports the idea of aligning the periodicity of health approval and licence validity, as laid out for truck and bus drivers licences (5 year intervals)¹. This would increase the practical value of the licence.

The Hungarian and Italian NSAs would like the certificate and the licence to be merged into one single document with the use of a microchip in order to facilitate the works of both the NSA and the companies.

The French NSA explained that the stakeholders had a clear preference for an on-line application and a simplification of the procedure in case of updating the licence. In order to meet this demand, the French NSA has taken measures in order to have a web application and to facilitate the update of the licence.

The Danish NSA considers it helpful to prescribe that an application for a licence should be made to the NSA/competent authority of the Member State in which the competence has been obtained.

The Belgian NSA explained that considering the increase in international traffic, it should be good to harmonise the documents necessary for the application to a licence. In the same context, it would be good that the rules for obtaining the certificate of general professional knowledge would be harmonised too. SNCF also considers that the criteria of delivery of the licence are not equal in all the Member States. The aim of Directive 2007/59/EC is to harmonise the criteria and requirements to obtain the licence. These criteria and requirements should be then fully harmonised to have a consistent approach throughout the EU. Finally, they would like to add a clear rule that one person cannot apply for a second licence in another Member State.

The Spanish NSA complained that the European system has lowered the requirements to get a licence which has a negative economic impact on training centres. Before the European system, the drivers needed a training of 1150h before getting a licence. The sector claims that the level should be at least the same as before. Besides, the requirements for the licence are considered as poorly defined which causes gap in the harmonisation. Finally, the Spanish NSA has encountered problems with the conversion of the old licences to the new ones.

The Swedish NSA has received positive feedback from the stakeholders on the tool put in place in order to convert all old licences to the new ones with a simplified administration. Only one issue in this context has been mentioned concerning the obligation to inform and register the place of birth. According to the Swedish NSA, the possibility to put this data as optional should be studied. This information can be highly sensitive, especially in the case of adoption.

Società viaggiatori Italia explained that, in order to improve the licensing scheme, it should be specified if, after a work incident, the train driver should take a medical visit or a medical and a psychological visit contrary to what is written in Directive 2007/59/EC, with systematic medical and psychological tests.

VDV considers that Directive 2007/59/EC should be aligned with the “Council Directive 2005/47/EC of 18th July 2005 on the Agreement between CER and ETF on certain aspects of the working conditions of mobile workers engaged in interoperable cross-border services in the railway sector”. In this Directive, clause 1 of the agreement, which forms an annex, defines that

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:32006L0126:en:HTML> (9) and article 7, 2.b.



cross-border services which are operating in a corridor of 15km parallel to the border are not considered as cross-border services.

A similar definition is contained in point 2.2.1 of TSI OPE. VDV believes that such a definition should also exist in Directive 2007/59/EC. Especially if the adjunct IM agrees on special arrangements for the cross-border sections (e.g. language and operating regime). The operation of a train driver only on this section should not be considered as international operation. In this way, the language requirements should then be fitted to the requirements published by the IMs.

2.1.2. Procedures for issuing licences

The application form is easily accessible through the website of the NSA or of the competent authority in most of the Member States. Besides, the necessary documents that should accompany the application form are generally listed. In some Member States, the organisation responsible for issuing the licences has produced an application guide where the full procedure for applying for a licence is explained in a structured manner (United Kingdom, Slovakia, Luxembourg, Italy, France, Austria, Sweden, Germany, the Netherlands, Belgium).

It is also possible to use an on-line application in a rather limited number of Member States (Estonia, Poland, Finland). However, in some Member States, the procedure for licences is partly on-line or fully on-line only for some companies. In the Netherlands, Lithuania and Hungary, the application form should be sent to the NSA by e-mail but the accompanying documents should be sent by post. Finally, in Belgium, the RUs can, on behalf of the driver, make an application through an electronic system with electronic application form. This procedure is only available for RUs which have an agreement with the Belgian NSA. Besides, some simplified procedures have been introduced in some Member States in order to react promptly to simple request. In Denmark, for instance, only a proof of the expected change will be requested in case of simple change (name, some medical requirements).

According to article 9.2 of Directive 2007/59/EC, "a Member State may apply more stringent requirements with regard to the issuing of the licence on its own territory". This possibility has been specifically used in three Member States. In Denmark, the NSA, as part of the procedure for obtaining the licence, will check the central convictions database of the national police in order to verify whether the applicant has been convicted of any relevant crime (drunken driving, possession of drugs, etc.). A similar request exists in Poland as the applicant shall send a statement of impunity of crime as accompanying document to the completed application form. NSA Germany is planning to have direct access to the German "Central Card-Index for Traffic Offences" from 2014.

Finally, in Norway, the companies were afraid of not having the results of the health approval and not having the control on the medical checks anymore. As a result of the discussions, the NSA informs directly the companies of the results of the health checks.

2.1.3. Fee for licences

Member State	Fee (in €)	Additional fee (in €)
Austria	163€ 73€ in case the application is rejected	
Belgium	108€	



Czech Republic	20€	
Denmark	150€	
Estonia	25€	
Finland	150€	
France	125€	
Germany	150€ 175€ if a preliminary licence is requested	50€ for registering information to the employer of drivers
Hungary	44€	
Italy	43€	
Lithuania	59€	
The Netherlands	102€	
Poland	48€ 24€ in case of on-line application	
Slovakia	30€	
Spain	112€	
Sweden	224€	
United Kingdom	No fee to obtain the licence as Office of Rail Regulation (ORR) is funded by a financial levy on the UK rail industry which covers all NSA works.	

VDV considers that a fair harmonisation of the “obtaining the licence” procedure throughout the EU requires also a harmonisation of the fee to be paid to the competent authority for a licence.

2.1.4. Basic requirements – general

NSAs and stakeholders have commented on four specific points concerning the general basic requirements:

- Age of the driver:

In the United Kingdom, the possibility of allowing younger drivers (18/19 years old) for domestic traffic has not been taken into consideration as some research made by RSSB evidenced that younger drivers were a greater safety risk. In Lithuania, the minimum age prescribed to become a train driver is 21.

- Criminal record:

Several Member States like Slovakia, Poland and Denmark have added as a precondition for becoming a driver to provide a document proving that no criminal acts have been done by the applicants.

- Medical requirements:

More stringent requirements from a medical point view in hearing (no hearing aids) and speaking capabilities are applied in Poland.

- Basic education:

Many NSAs (United Kingdom, Italy, Denmark, Czech Republic, Poland, Sweden) consider that the level of basic education (level 3 of Decision 85/368/EC) is not relevant to demonstrate the ability to drive a train. It could be even considered as too high level for the Czech NSA. According to Polish and Italian NSAs, the school level required is too general while the priority should be given to technical training like mechanics or electrical systems. Moreover, NSA Denmark considers that it might also not be relevant in relation to the competence needed to become a train driver. Furthermore, such requirements do not exist for bus or truck driver trainees. Finally, it can even hinder some vocations as, according to Swedish NSA, this requirement prevents applicants to



apply and increases the cost significantly for a driver with already proven competences and suitable for the task of driving a train. This problem was also pointed by SNCB considering that the reference to Decision 85/368/EEC is irrelevant as this Decision has been withdrawn. Finally, in Slovakia, there are more stringent requirements as an applicant should have a high school degree in Electromechanics or Machine industry.

2.1.5. Basic requirements – medical and psychological

NSAs have commented on four main points concerning medical and psychological requirements:

- Vision:

The British NSA informed that there was no test available in the United Kingdom to enable doctors to properly test contrasts which creates a difficulty to evaluate this requirement. A similar problem has been described by the Norwegian NSA. The requirements for the drivers to be able to differ between the different levels of grey is common to shipping but not considered as useful for train drivers. Besides, in Norway, there is the equipment to test this requirement in only one place which would make it very expensive to test all drivers as they would all have to go to this place. According to Norwegian NSA, this requirement should be deleted from the part of the physical requirements. RFI explained that the requirement of vision for both eyes with possible exemptions is not acceptable. There is no adequate evidence that without an effective vision for both eyes a train driver is able to perform his job safely. RFI supports the advice of the Agency in this respect. Trenitalia considers that the binocular vision for both eyes should be revised as well. SNCF considers that the requirements for the vision should be amended. Finally, the Polish NSA proposed four amendments:

- a) Maximum corrective lenses: hypermetropia +4 / myopia -5 (by higher correction problems with accommodation in hypermetropia and with retina degeneration in myopia);
- b) requirement for effective binocular vision should be combined with requirement for vision for both eyes, not as two separate requirements which is unclear;
- c) mesopic vision: effective. This requirement should be added;
- d) no progressive eye diseases deteriorating function of vision.

- Sudden incapacity:

The British NSA expressed some concerns raised by doctors about the standard to apply in assessing medical risk of sudden incapacity like diabetes or heart attacks. No list or agreed percentage of risk is available in the United Kingdom. However, in general, the British NSA believes that the current level of details is sufficient to achieve the goal of the Directive. The Dutch NSA explained that it is not possible to predict sudden incapacity resulting from heart diseases or cerebral conditions.

- Periodic checks - medical requirements:

The Luxemburguese NSA informed that the medical checks are made each year in Luxembourg but that it will be changed to every three years. The French NSA, on the other hand, commented that, as the frequency of the medical checks is at least every three years, it might be more stringent in other Member States creating problems of mutual acceptance of the licence. The French NSA considers that Directive 2007/59/EC should be more precised on the frequency of the medical checks. In addition, the Danish NSA regrets that there is no link between the duration of the validity of the licence (10 years) and the frequencies of the periodic checks for medical requirements (3 - 1 year(s)). Furthermore, a fixed frequency of 5 years is laid out for truck and bus drivers, and this for a transport mode without dead man handle or ATC. The Polish NSA also explained that the requirements might differ from Member State to Member State creating difficulties. The Dutch NSA considers that the periodic checks for medical requirements should not be performed between the age of 20 and 40. Finally, the Spanish NSA explained that they faced



some difficulties in interpreting when to renew the examination of physical fitness. They finally consider that it must be before the expiration date but with effects since then.

- Psychological requirements:

The comments related to the psychological requirements are dissonant. On one hand, the British and Danish NSAs consider that no further requirement is needed for the psychological checks. On the other hand, the French and Belgian NSAs explained that Directive 2007/59/EC leaves to the Member State the decision of the frequency of the psychological checks and that it could create discrepancies between Member States and, eventually, problems of mutual recognition. The Swedish NSA considers that the psychological requirements are too general and could lead to diverging assessment for a same driver. According to the Swedish NSA, Directive 2007/59/EC should rather point out in which areas the applicants' personality should be tested. This should be developed by experts in psychology. Finally, the Dutch NSA has started an international benchmark in order to revise the Dutch criteria regarding psychological requirements. SNCF explained that more stringent requirements are applied for occupational psychological fitness. For SNCF, more detailed psychological requirements are necessary. Indeed, according to SNCF, some criteria like psychomotor, cognition and communication should be moved from the medical requirements to the psychological requirements. SNCB considers that the types of psychological tests need to be defined into more detail since the impression is that these tests are set up in an arbitrary way. Trenitalia considers that there is an ambiguity between Annex II and article 16 of the Directive regarding periodic psychological examinations after appointment. The reference to paragraph 3 of article 11 should be dropped. VDV explained that there are different understandings throughout the EU on whether the periodic checks should contain the psychological fitness too. VDV considers that it should be the case only if the RU finds it necessary. CGT requested that psychological recognition has to be renewed every 10 years and the removal of psychological recognition in case of accident involving person. CFDT is concerned about the application of Directive 2007/59/EC in the renewal of the psychological capacities. CFDT is asking for its abrogation.

Apart from these four main points, the NSA also commented on more specific points:

- The Norwegian NSA explained that the electro-cardiogram (ECG) test listed is not applicable as the drivers have to come back for another ECG to be approved. According to the Norwegian NSA, the ECG should be changed to a "working ECG" test.
- According to the Dutch NSA, the definition of "fit for purpose" should be reviewed as it is unclear and vague.
- The Danish NSA would like a general comparison of the medical requirements for staff dealing with safety related tasks in other modes of transport to be made. Depending on the result, an intermodal harmonisation of medical requirements should be considered.
- The Spanish NSA would like some detailed specific cases where hearing aids are used.
- The Swedish NSA proposed to reverse the way the medical requirements are presented in Directive 2007/59/EC. Instead of having a lot of general requirements, the Swedish NSA has listed a number of medical conditions that impede to become a train driver. Annex II of Directive 2007/59/EC should be revised by experts in medicine and psychology in this way.
- VDV wonders what would be the legal basis for a medical doctor to inform the RU about the deterioration of health of a train driver. The obligation of information for a break of more than three months should be deleted from the Directive.
- VDV does not see the need of increased frequency of medical examination for train drivers older than 55 and would like to delete this obligation.



2.1.6. Annex IV of Directive 2007/59/EC on general professional knowledge and requirements regarding the licence

Most of the NSAs (United Kingdom, Luxembourg, Denmark, Czech Republic, Belgium, Hungary, Poland, Spain and Sweden) which replied to the questionnaire clearly indicated that they supported the advice sent by the Agency and that it would improve annex IV. Despite this strong support, many NSAs also expressed that the requirements for the general professional knowledge are too general (NSAs Slovakia, Spain, Italy) and that they can lead to different interpretations which would then make it impossible to have a common ground (NSAs Italy, Sweden). Finally, all the stakeholders that answered this question are in favour of the advice of the Agency. Deutsche Bahn considers that the proposal uses competence levels to describe the required knowledge (better designed in education, more transparent examination, more confidence in the licence by RU). ALE considers that the current annex IV is inadequate for keeping the level of safety in the European Union, a higher level of knowledge is necessary. ALE would see the advice of the Agency as an improvement but also considers that more knowledge relating to the certificate part should be transferred to the licence. SNCF explained that the objectives of training are very general and, consequently, the training programme is difficult to work out. The objectives of training are only based on theoretical knowledge and do not allow to develop competences (to know how to make). These too general objectives make it impossible to reach a European common level. That is why SNCF supports the advice of the Agency as it would allow determining approximately the duration of the course. SNCB considers that there is too much room for interpretation which leads to big differences in the training for obtaining the licence and thus supports the advice of the Agency as well as Trenitalia.

Many NSAs consider that it should be possible now, with the initial experiences gained, to develop more precise requirements for Annex IV (NSAs Italy, France, Austria, Hungary, Spain, Sweden, Norway), even if it is complicated to have a harmonised knowledge on a non-harmonised network with different railway cultures (NSA France). These more precise requirements could be either a more detailed training programme (NSA Italy) or to fix the number of hours spent and the minimum content of the workload of the training programme (NSAs Austria, Spain). NSA Norway considers Annex IV as a short educational programme for the drivers' licence. According to the Norwegian NSA, the general training should involve more knowledge.

Finally, some NSAs have commented on some specific points of Annex IV:

- NSA Norway explained that more harmonised operational rules would also strongly support the development of interoperability and staff competences;
- NSA Denmark would like to see a more balanced reflection of category A and category B drivers in the tasks and conditions of Annex IV;
- NSA Denmark considers that the requirements to apply the basic principles of electro technology might be seen as competence valid for the certificate;
- NSA Sweden explained that they have developed a training plan which is not mandatory to be used but a guide to harmonise and to match the test that concluded the training.



2.2. Recognition and accreditation

2.2.1. Recognition of training centre

Member State	Fee (in €)	Additional fee (in €)
Austria	6€	
Belgium	2705€ (every 5 years)	
Czech Republic	120€	
Denmark	0€	
Finland	150€	150€/hour for the recognition
France	4300€	
Germany	850€	
Hungary	2047€	
Italy	5000€ 2500€ for renewal	14€ for stamps
Lithuania	49€	
The Netherlands	4500€	
Poland	200€	2000€ maximum annual fee to be paid for the supervision of the training centre
Slovakia	200€	
Spain	5700€	
Sweden	3778€	2260€ as annual fee for the supervision
United Kingdom	No fee to obtain the recognition as training centre as Office of Rail Regulation (ORR) is funded by a financial levy on the UK rail industry which covers all NSA works.	

Member State	Decision implemented	Recommendation implemented
Austria	YES	NO
Belgium	YES But not yet published.	YES But not yet published.
Czech Republic	YES	YES
Denmark	YES	YES
Finland	YES	YES
France	YES	YES
Germany	NO It will be soon be the case with the 8 th railway regulation amendment ordinance.	NO
Hungary	YES	NO
Latvia	YES	YES
Lithuania	YES	YES
The Netherlands	YES	YES
Norway	YES	YES
Poland	NO In Polish law, there is already a list of	NO



	detailed requirements and procedures for the recognition.	
Spain	NO The current Spanish legal frame is very close to the European decision and its adaptation should have taken place in June 2013.	NO
Sweden	YES	NO

Some detailed comments have been received concerning the procedure of recognition:

- The British NSA explained that Eurostar's language school has higher and more rigorous standards than the requirements for language trainings in the European legislation, which are very limited. In this situation, the standards of Eurostar apply.
- The Dutch NSA considers that the definitions of non-discriminatory access and independence of the training centres are too vague. Training is a market issue while examinations are related to governmental aspects. In this way, the Dutch regulations are focusing on examinations part. Training centres might be private companies but also public schools that are recognised by the Ministry of education but they shall also undergo a procedure of recognition from the Ministry of Infrastructure. These schools are subject to a double recognition. The problem is mainly related to the supervision of these schools as the supervision procedure of the two Ministries is different.
- The Italian NSA informed that no training centre providing language training has been recognised due to a lack of interest. In order to facilitate the access to rolling stock and infrastructure, an agreement between the RU/IM and the training centre is needed. On the Decision related to training centre, the Italian NSA considers that a better formulation on the prohibition for RUs to deliver training for other companies and thus replacing a training centre would be necessary.
- The French NSA informed that one stakeholder considers that 3 years of experience as train driver was too restrictive to become a trainer.
- The Danish NSA informed that future applicants have raised the question of the need and benefit to have supplementary acceptance of training centre when RU/IM are already competent of training their own train drivers and the train drivers from other RU/IM. According to the Danish NSA, having an SMS for the RU/IM should be a sufficient proof of training competence of train drivers. This comment is shared by VDV which considers that as the RU has to prove in depth its capability for safe railway operation with its SMS in order to obtain its safety certificate, the obligation to be recognised as training body should be totally deleted for RUs. They should be allowed to train drivers for partners as well. CFDT also would like a system of continuous professional follow-up which would avoid every three years evaluation for keeping the validity of the complementary certificate.
- The Danish NSA considers that contents and structure of training courses might be an option in the perspective of future European harmonisation.
- The Spanish NSA complained that before the European decision, the trainer did not need recognition but only some years of experience. The Decision has complicated the system.
- The Swedish NSA informed that they only issue recognition for the language training centres on their capabilities to train on rail terminology. Besides, the training centres find the requirements vague and unclear which are complicated to assess for the NSA.



2.2.2. Recognition of examiners/examination centre

Member State	Fee (in €)	Additional fee (in €)
Austria	6€	
Belgium	2705€ for examination centre (every 5 years) 50€ for examiner (every 5 years)	
Czech Republic	0€	
Denmark	0€	
Finland	145€ for examiner	
France	850€ for examination centre	
Germany	850€ for examiner 850€ for examination centre	
Hungary	20€ for examiner	
Italy	29€ for examiner	
Lithuania	53€ for examiner 39€ for examination centre	
The Netherlands	1000€	500€ yearly update
Slovakia	200€	
Sweden	1259€ for examiner 3779€ for examination centre	2125€ annual fee for supervision for examiner 2260€ annual fee for supervision for examination centre
United Kingdom	0€	

NB: Examiners who are working in an examination centre do not have to pay an individual fee.

Member State	Decision implemented	Recommendation implemented
Austria	YES	NO
Belgium	YES But not yet published.	YES But not yet published.
Czech Republic	NO Applied on request of the Ministry of Transport	NO
Denmark	YES	YES
Finland	YES	YES
France	YES	YES
Germany	NO It will be soon be the case with the 8 th railway regulation amendment ordinance.	NO
Hungary	YES	NO
Latvia	YES	YES
Lithuania	YES	YES
The Netherlands	YES	YES
Norway	YES	YES
Spain	NO The current Spanish legal frame is very	NO



	close to the European decision and its adaptation should have taken place in June 2013.	
Sweden	YES	NO
United Kingdom	YES	NO

Some detailed comments have been received concerning the procedure of recognition:

- The British NSA stated that Article 5 of Decision 2011/765/EU permits RU's training centres to be recognised as part of the safety certification process. In the United Kingdom, examination/assessment centres are also part of the RU and, according to British NSA, it would seem logical to allow those to also be recognised in this way.
- The Spanish NSA informed that most of the comments received were related to the obligation to have a valid licence and certificate to be examiners.
- The Swedish NSA informed that the examiners and training centres find the requirements vague and unclear which are complicated to assess for the NSA. The Danish NSA confirmed this experience.
- VDV considers that as the RU has to prove in depth its capability for safe railway operation with its SMS in order to obtain its safety certificate, the obligation to be recognised as examination body should be totally deleted for RUs. They should be allowed to examine drivers for partners as well.

2.2.3. Recognition of medical doctors

Member State	Fee (in €)	Additional fee (in €)
Belgium	2705€ for medical centre (every 5 years)	
Finland	100€ for doctor	
France	0€	
Germany	850€ for doctor 850€ for medical centres	
The Netherlands	1778€ for medical centres (every 5 years)	
Poland	200€ for medical centre	2000€ annual fee for the supervision.
Slovakia	50€ for doctor	
Sweden	1300€	Annual fee for the supervision not decided yet.
United Kingdom	0€	

The NSAs have explained the requirements and criteria that should be met in order to get the recognition as medical doctor or medical centre.

The British NSA informed that to get a recognition a doctor shall:

- Be registered with the UK General Medical Council;
- Have a qualification in occupational medicine;
- Have two years of experience;
- Meet the Association of Railway Industry Occupational Health Practitioners competency guidance.



The Slovak NSA informed that to get a recognition a doctor shall meet the requirements set in the Ordinance 245/2012 Coll. On professional competences, medical and mental capacities of persons in the operation of railways and transport on railways.

The Norwegian NSA informed that, to be recognised, the doctor/psychologist should have completed the training elaborated by the NSA and passed an exam. In order to keep their recognition, they must complete at least 10 examinations a year.

The French NSA informed that to get a recognition, a doctor shall:

- Provide a proof of identity;
- Be registered in the order of the doctors;
- Provide an extract of his/her criminal record;
- Provide the proofs of his/her skills and professional experience.

The German NSA informed that to get a recognition, a doctor shall:

- Work in the field of occupational medicine or industrial medicine or doctor in an assessment centre for fitness to drive;
- Have at least one year experience;
- Attend once per year a training organised by the competent authority.

One doctor and one medical centre from Austria have been recognised by the German NSA.

The Czech NSA informed that there is no recognition of medical centre.

The Hungarian NSA informed that to get a recognition, a doctor shall:

- Obtain the industrial medical or employment medical special exam;
- Know the typical rail traffic danger.

The Polish NSA informed that to get a recognition, a medical centre shall:

- Be registered in the list of health care centres with at least two doctors specialised in preventive health care, otorhinolaryngology, ophthalmologist, neurologist, psychologist specialised in rail psychology;
- Ensure the re-examination for free.

The Spanish NSA informed that to get recognition, a medical centre shall:

- Have the structure of a mercantile society (if not RU or IM);
- Prove professional competence and technical capacity";
- Prove financial capacity;
- Prove civil liability.

In Spain, medical and psychological centres are recognised jointly which allows submitting the drivers to both medical and psychological tests at the same time.

The Spanish NSA considers that common procedures for the recognition and more specific criteria would be helpful for harmonisation at EU level.

The Swedish NSA informed that to get recognition, a doctor shall:

- Hold a valid medical licence;
- Deliver documentation to show knowledge about risks connected with working in railway environment.



The Dutch NSA recognises medical centres and also second line experts. In the case where a medical doctor has doubt on a specific issue, the doctor can raise questions to a second line expert that shall be recognised as well.

In Finland, a doctor must fulfil certain requirements mentioned in the Finnish Competency legislation. A doctor must be certified as a medical doctor. Moreover a doctor must know the health requirements concerning safety critical tasks, have practical knowledge of those tasks and know the safety risks in them. Finland has also recognised such medical doctors who are familiarized with transport medicine. The procedures to recognise medical doctors follow the procedures developed in Commission Recommendation 2011/766/EU.

According to SNCF, a medical doctor should be recognised if he attends continuous education training and performs a certain number of medical examinations.

2.2.4. Recognition of psychologists

Member State	Fee (in €)	Additional fee (in €)
Belgium	2705€ for psychologist centre (every 5 years)	
Finland	100€ for psychologist (every year)	
France	0€	
Germany	850€ for psychologist 850€ for psychologist centre	
Lithuania	16€ for psychologist	
The Netherlands	1778€ for psychologist centre (every 5 years)	
Slovakia	50€ for psychologist	
Sweden	2000€	Annual fee for the supervision not decided yet.
United Kingdom	0€	

The NSAs have explained the requirements and criteria that should be met in order to get the recognition as psychologist or psychological centre.

The British NSA informed that to get recognition, a psychologist shall:

- Have a British Psychological Society certificate of competence in occupation testing at level A or level 2;
- Be on their register of qualifications in test use;
- Carry out tests in line with the RSSB's rail industry standard for train driver selection (RIS-3751-TOM);
- Work for an assessment centre that is externally audited every two years.

The Slovak NSA informed that to get recognition a psychologist shall meet the requirements set in the Ordinance 245/2012 Coll. On professional competences, medical and mental capacities of persons in the operation of railways and transport on railways.

The Norwegian NSA informed that, to be recognised, the doctor/psychologist should have completed the training elaborated by the NSA and passed an exam. In order to keep their recognition, they must complete at least 10 examinations a year.



The Luxemburguese NSA informed that to get recognition, a psychologist shall:

- Have a diploma of higher studies in psychology;
- Hold a document certifying that he assumed responsibilities in the field of occupational psychology during 2 years.

The French NSA informed that to get recognition, a psychologist shall:

- Provide a proof of identity;
- Be registered in the order of the doctors;
- Provide an extract of his/her criminal record;
- Provide the proofs of his/her skills and professional experience;
- Provide an explanatory note explaining his activities;
- Provide a technical note describing the methods he/she will use.

The German NSA informed that to get recognition, a psychologist shall:

- Demonstrate a diploma as psychologist or equivalent degree in psychology or is recognised as professional psychologist for traffic technology;
- Have at least one year of experience in the field of rail transport.
- Attend a training organised once per year by the competent authority.

The German NSA has recognised two psychological centres from Austria.

The Czech NSA informed that there is no recognition of psychologist in Czech Republic.

The Hungarian NSA informed that to get recognition, a psychologist shall:

- Obtain the necessary qualification;
- Have operating permit;
- Know the typical rail traffic dangers.

The Swedish NSA informed that to get recognition, a psychologist shall:

- Hold a valid licence for psychologist;
- Present documentation showing knowledge about risk connected with working in railway environment;
- Present a list of relevant methods for testing the applicants.

In Finland, a psychologist must fulfil certain requirements mentioned in the Finnish Competency legislation. A psychologist must be certified. Moreover, a psychologist must know the psychological requirements concerning safety critical tasks, have practical knowledge of those tasks and know the safety risks in them. A psychologist looking for recognition must also be familiarized with (psychological) personal estimation and certain attributes required in those tasks. The procedures to recognise psychologists follow the procedures developed in Commission Recommendation 2011/766/EU.

2.2.5. Accreditation

The accreditation is used in very few Member States and when it is, it is only limited to a certain category or for a specific purpose. Accreditation is used for the task of training by the Hungarian labour office. Italy is considering using accreditation only for training centres management system with the aim of mutual acceptance (for individual competences of trainers, recognition is used). In Latvia, the psychological centres are accredited by the national accreditation body.



The British authorities are not using accreditation and accreditation is not considered to be used. According to the British NSA, accreditation would involve a significant cost to the process by requiring a formal accreditation procedure for which a charge would be made.

2.3. Certificate

2.3.1. General organisation of the certification scheme

The NSAs and stakeholders have commented on four major points concerning the certificate:

- Cross-border services:

The French NSA pointed out the difficulty to define what a new cross-border train driver leading to an uncertainty. As for the Czech NSA, there should be lower requirements for train drivers going only to the first border station.

- Language competence:

The British NSA explained that the language training centres are recognised in one Member State but not in another one. French and Belgian based drivers have not obtained their language competence from Eurostar's language school, which is recognised by the NSA. In this situation, the NSA has no possibility to monitor or audit the work of the other language training centres. However, the British NSA has recognised Eurostar's language for teaching French to drivers based in the United Kingdom. The Belgian NSA indicated that they are facing difficulties in the acceptance of the language level of the train drivers. One of the difficulties that ZSSK has faced is that the Czech authorities require from ZSSK's train drivers also Czech internal document. Deutsche Bahn explained that there was no analysis of the existing level required for language competences. This was confirmed by Trenitalia which considers that there are too many interpretations of level 3 for language competences.

- Competences on infrastructure and rolling stock:

The British NSA pointed out that the certificate is open to infrastructures routes and rolling stock descriptions being recorded in different ways. According to them, some examples of what are expected should be given in order to aid consistence in the approach. The British ATOC suggested to list rule competence and brief outline of route knowledge as the key element is to ascertain that the driver has been trained in the operational rules. To face this problem, the Italian NSA has developed and issued national provisions in order that all RU/IM are using a standardised method for the identification of the line sections (relevant routes) of national infrastructure on the certificate. The Luxembourgese, French and Polish NSAs are even going further as they consider that harmonised rules concerning the information on the certificate should be developed at European level especially for the infrastructure knowledge. Trenitalia considers as essential to have homogeneous method to describe the infrastructure on which the holder is authorised to drive (among all EU Member States). Trenitalia suggests adopting a simple rule for certificate A and another for certificate B. In this way, there is an advantage of having a short list of lines/infrastructures on certificate B. Trenitalia gave the following example:

- For Certificate A – locality (town, city, station, etc.);
- For Certificate B (regional traffic) – Region/land (such as political or geographical) that contains all the lines standing in that Region.
- For Certificate B (long distance traffic) – the main transeuropean line.

VDV informed about the difficulty to define the scope of "rolling stock" competences to be described on the certificate. VDV wonders if the professional qualifications should be checked by each RU if a train driver is working for two or more RUs. VDV believes that the RUs should have



the possibility to make a joint system or continuous monitoring for similar tasks. A system of continuous monitoring should be added as a means of proving the validity of professional qualifications and language knowledge.

- Layout of the certificate:

Several NSAs (Norway, Denmark, Sweden, Lithuania and the Netherlands) complained about the layout of the certificate. For the Norwegian NSA, this layout is not compatible with modern electronic systems used by the companies. They consider that using tablets for the certificate should be added as an optional solution in Directive 2007/59/EC. The Danish NSA also considers that it should be made possible to issue the certificate electronically without having necessarily a smartcard for the licence. It could be securely hold and distribute updated certificate information. According to Danish NSA, paper solution seems anachronistic. Finally, the Swedish NSA explained that Commission Regulation 36/2010 requires the certificate to be 10x21cm. With this solution, a standard A4 format shall be transformed into a smaller format. This creates de facto administrative efforts and technical adjustments which incurs costs for the companies. VDV explained that the certificate is linked by a unique number and the name of the driver to the licence and wonders why many personal data are duplicated in the certificate (especially the photo). Some of these requirements should be deleted. Besides, the reliable information for the company employing or contracting the driver is the documentation the company has in the files defined by the SMS. Therefore, according to VDV, it would be sufficient and much more cost efficient than the certificate itself. Deutsche Bahn explained that the design of the CCR should be thought again. The squares to print in the date of birth, the number of licence and the validity dates are very small. Furthermore, the adjustment of the form printers is very difficult. Deutsche Bahn proposed to change the format in a way to make it possible to print the dates and the licence number with the minimum of 8pt in a direct way without squares – proposal of DIN A4-format with fields on the front and backside.

The French NSA considers that a question remained unanswered with the current European legislation: they wonder who is responsible for the certificate of the driver in case of contractual business arrangements. The Polish NSA also identified a gap in Directive 2007/59/EC concerning the employment of one driver by two or more companies causing, for example, difficulties in controlling the working hours of drivers. This is corroborated by VDV which considers that Directive 2007/59/EC does not handle the aspect of train drivers employed by one company and working for more than one company. Especially in the case that the employer of the train driver is an RU, VDV proposes to add the possibility that another RU describes in its SMS that certificates of pre-checked cooperation partners are honoured. The use of train drivers employed by others RU is comparable to the use of vehicles maintained by other ECMs than the own one. In the latter case, the EU legislation foresees the check of the shared risks and interfaces but no document by each RU for each vehicle used whilst Directive 207/59/EC requires a document (certificate by each RU) for each driver.

VDV wonders what is the reason to report the cessation of employment and what is the use of this information for the competent authority. This obligation, according to VDV, should be deleted from the Directive 2007/59/EC.

Finally, most of the NSAs informed that the procedure of certification was one of the topics checked when the companies were supervised and their SMS analysed.



2.3.2. Annex VI of Directive 2007/59/EC on professional knowledge of infrastructure and requirements regarding the certificate

Most of the NSAs support an amendment of Annex VI.8 of Directive 2007/59/EC on language competence and consider that the advice sent by the Agency would be an improvement (NSAs United Kingdom, Slovakia, Norway, Lithuania, France, Denmark, Germany, Czech Republic, Bulgaria, Sweden, Finland). Only three NSAs have expressed contradictory opinion to the advice proposed by the Agency. The Dutch NSA strongly opposes to the advice of the Agency as they consider that the level B1 foreseen for the drivers is too high and that a level A2 would be sufficient. The Italian NSA considers that level B2 of the Common European Framework of Reference for Languages (CEFR) should be applied to both train drivers and examiners. The Latvian NSA does not support the advice sent by the Agency as, in Latvia, very often drivers who are used in the territory of another Member State use their native language as they are bilinguals (Russian). Finally, five stakeholders' organisations specifically supported the advice of the Agency (Deutsche Bahn, ALE, SNCF, Trenitalia and SNCB).

The Danish NSA also recommended that language competence could be assessed through an oral examination of the candidate train driver carried out or supervised by a recognised examiner representing the relevant infrastructure in question.

Finally, ALE informed that in Spain, to obtain the licence and certificate B, it is necessary to follow more or less 1150 hours of training.

2.4. Registers

In most of the Member States, NLR and CCRs are independent registers. However, in certain Member States, a choice has been made to connect the NLR to another register. In Lithuania, NLR and CCR are connected via the Lithuanian NSA's information system. With this situation, RUs and IM can use a CCR created by the NSA. In this case, the RU and IM should not do more than to provide the information to the Lithuanian NSA. The Estonian NSA has integrated the NLR into a broader register system to which CCRs are also connected. The Danish NSA informed that the NLR is combined with the overall medical register of the NSA. The German NSA has connected internally the NLR to an IT-transaction-management. It will be extended to an administrative system next year which shall integrate all the activities on the side of the licence of the NSA. The Hungarian has connected the NLR to a broader system and the interconnexion between NLR and CCR is under development. The Latvian NSA has an independent NLR but which is valid for both the licence and the certificate. NLR and CCR are interconnected in Spain. In Finland up to now the interconnection is used only between the RAHEKE (NLR) and VR Company register (CCR). Finally, the Swedish NSA informed that NLR is integrated with other systems within the NSA to merge relevant information and connected to the Swedish Tax Agency for automatic update of registered personal information. NLR has an external part where the driver can apply online for the licence and the information is automatically transferred to the register. NLR is also connected to the unit within the NSA responsible for manufacturing the licence.

Several NSAs (Slovakia, Poland, Italy) pointed out that a programme enabling interoperability of registers should be delivered and two NSAs (Luxembourg, Germany) proposed that the IMI system should be implemented. On the other hand, the Danish and French NSA have not seen the need of interconnection between NLR and CCR for the moment and no exchange between these two registers has taken place at this stage.



ERA has performed a Feasibility Study for a computer-based application fulfilling the basic parameters for the National Register of Train Driving Licence (NLR) and the Register of Complementary Certificates (CCR) and facilitating the exchange of information among competent authorities, railway undertakings and infrastructure managers and delivered it to the Commission in the beginning of 2013. After defining the business case and evaluating all proposed models, ERA and a set up Task Force has reached the conclusion of proposing the business model with the customisation of the secure information exchange system provided by Internal Market Information System (IMI), developed by the General Directorate Internal Market of the European Commission and proceed to the next steps on defining precisely the pilot on the NLR level.

Member State	FTE - update	Language used
Austria	4 employees Real time	German
Belgium	4 employees Daily update	French and Dutch
Bulgaria	Two employees Daily update with a normal delivery time of one week	Bulgarian
Czech Republic	6 employees Update in real time	Czech and English
Denmark	One IT specialist and one employee Updated when required	Danish and in principles other languages
Estonia	5 employees Real time	Estonian and Russian
Finland	2 employees Every day	Finnish
France	One employee Daily update	French
Germany	Two employees It might take up to one month to introduce a change	German
Hungary	One employee Real time	
Italy	1.5 employee In real time for suspension and withdrawal and within one week for the other cases	Italian
Latvia	One employee Valid for both NLR and CCR	Latvian
Lithuania	One employee Daily update	Lithuanian and English
Luxembourg	Between 0.1 and 0.75 fte	Request can be made in German, Luxembourgish and French Answer is in French
The Netherlands	3.5 employees Real time updates	Dutch and English
Norway	One system manager and 2/3 persons in charge	Norwegian, Swedish,



	of updating the register. The update is made right after the request of new data has been launched	Danish, English
Poland	Two employees Real time during working days	Polish
Slovakia	One employee	
Spain	Seven employees Real time for RENFE and monthly for the other RUs	Spanish
Sweden	Register automatically updated when new information comes in. The information requests are answered via mail, email, phone or by direct request. No automatic solution has been provided. Delivery time depends on the complexity and extent of the requested information.	Swedish
United Kingdom	Four weeks to answer a request but no request until now. Inspectors will check that the registers are in place and record details of the licence number for cross reference purposes.	English

Several NSAs commented on specific points related to the registers:

- The Italian NSA would consider useful an information about an effective use of the licence owner;
- The Czech NSA informed that the access rights to the CCR is done on a voluntary basis. Otherwise, the access is guaranteed through written request;
- The Czech NSA complained about the time and difficulty to update the medical fitness details as they recognise over 15000 cases per year;
- The Polish NSA explained that, in practice, it might not be possible to contact the employer of a driver whose licence has been suspended or withdrawn. An amendment to the Directive could be that the RU/IM employing a driver should verify that the licence of the driver he will employ is still valid.
- The Swedish NSA explained that the Commission Decision 2010/17/EC requires the highest level of certification possessed while, according to Swedish NSA, only if the driver fulfils the requirements or not is necessary to be registered.
- Deutsche Bahn considers that the parameters for CCR are more extensive than really needed. CCR is integrated for the own drivers of Deutsche Bahn. Contracted train drivers of other RUs are registered in a second independent register because of national law regarding data protection. Knowledge of the infrastructure and CCS is named with regards to the abbreviations published by the NSA. Competences concerning rolling stock are named by the name/number of the class. The representatives of employer have always access rights and for other reasoned requests, it is answered until the next working day.
- SNCF has independent CCR which is updated in real time. The information requests are sent by email and answered in one day.
- CD has an independent CCR which is updated in real time.
- SNCB has an independent CCR which contains a module which manages the rolling stock and infrastructure for every driver. All train drivers belong to a 'production unit'. In every production unit, the data of the register are managed for the train drivers belonging to that production unit. In case of data to be updated, added or withdrawn, the register



manager will perform the necessary steps (on a daily, weekly or monthly basis). A train driver can always ask his/her personal data to the local 'production unit' register manager.

- Trenitalia has integrated the CCR into a larger system but operative staff cannot see all the data. The register is managed when it is needed. The information can be delivered in real time and printed.
- ZSSK explained that the Sloval NSA can have access to the register only with a physical control. URZD is not entitled to enter into ZSSK register.
- VDV explained that according to Decision 2010/17/EC, the NLR should contain data of the medical checks according to article 16.1 of Directive 2007/59/EC. However, VDV does not see the way in which it is foreseen that the competent authority is informed about the periodical checks carried out. It should certainly be necessary to add in article 16.1 the obligation for the driver and the RU to inform the competent authority for the register.

Finally, the German NSA proposed many detailed amendments that are copied in this report:

NLR-No.	Item	Comment
1.2	Version number in addition to the number of licence	The European Identification Number (EIN) of TDL is not unique, because duplicates can be issued. Therefore NSA-DE adds a version-number to the EIN in its register – parallel to the printing company of the licences ("Bundesdruckerei") (E.g.: what's about stolen TDLs?) → additional version-number is needed
3. to 6.	Identity of a TD to identify this TD later explicitly in the whole EU.	Is not guaranteed in the current decision. (E.g.: what's about a change in the name (e.g.: by marriage, by divorce; e.g. changing the name (or the notation of a name only!) to get a TDL in one MS, which is denied in another MS). Note: The EIN of TDL is not the same for the whole life of a TD (in DE: new number after 10 years with a new licence at the latest.) → ERA should think about an TD-ID in EU → But therefore at the moment is needed:
3.2	Birth-Name	→ essentially needed !
3.3	Middle-Name	(e.g. used in Spain, ...) → is forgotten in the register, but can be inserted in the mask of the licence.
6.1	Place of birth	→ needs the comment: "town or country" (some MSs declare not a town)
6.2	Nationality	→ should be better compulsory (for the re-identification of the country, the TD and his/her identity card comes from) [By the way: it is → forgotten in the CCR, but it is needed there for the CC!]
10.1	Reference number	→ should be compulsory in view of the future: e.g.: for an information-exchange with undertakings, for the administration of access-rights to TDL-data, ...
10.	Employer	Why the reference number could be asked, but the names (and contact-details) of the employers are not registered? Therefore
10.2	- " -	→ names and contact details of employers are needed (address, ..., (perhaps: contact person?))



NLR-No.	Item	Comment
		Note: there could be more than one employer
10.3	- " -	to identify undertakings, it makes sense to register → st. like a "company registration number" (in DE: "Handelsregisternummer"); so done in the NVR/ECVVR as "Owner-Registration-Business-number" ! (Note: perhaps needed in view of an European Railway Undertaking Register; in discussion for the ECVVR]
13.	Permanent place of residence, postal address	→ should be compulsory for an easier contact of the administration of the NSAs to the TD, particularly in the phase of authorisation of an TDL Phone and e-mail should be compulsory fields in the register, but optional to fill-out
13.1a	Street and number	some TD may have a post-office box only; → add option "P.O.B."
22. to 24.	Date of communication	in critical cases it may be helpful to know the reporting authority: → therefore add: the origin of communication
25.1	Basic requirement	→ explain, what is meant with "Text": »yes/no« OR »highest certificate« explictely
26. and 27.	Physical data (1) and psychological data	Why the administration-related data are to register in the NLR, when the medical / psychological procedures are managed, controlled and so registered by the employers naturally? So → such data can be registered and managed in the CCR → the NLR needs in both cases these information only: <ul style="list-style-type: none"> • »basic requirement is fulfilled: "yes/no"« • »this statement is valid "from ... to"« [only additional in the medical case: <ul style="list-style-type: none"> • Mandatory use of glasses/lenses • Mandatory use of hearing add(s); but these two points are already registered in Reg.No. 15.1.]
26.2 to 26.5 and 15.1	Physical data (2)	If the previous registration persists, some better explanations about the asked dates are wished
26.1, 26.6 and 15.1	Physical data (3)	If the previous registration persists, a coordination and perhaps reduction among the points 26.1, 26.6. and 15.1 should be considered.

2.5. Mobility and quality standards

2.5.1. Mobility

NSA	Measure to ensure investment cost (art.24 of TDD)	Impact of TDD on mobility
Belgium	The law gives the RU a legal opportunity to force the leaving driver to pay the cost of training.	Belgian NSA evaluated that only 1% of drivers changed company and this is increasing since the



		introduction of the European licence.
Czech Republic	If the driver will work for another company, the cost of current and past trainings shall be split between them.	
Denmark	Requirements to pay by size (number of train drivers) and the payback/compensation service to the companies training new train drivers. NSA is the administrator of this mandatory compensation scheme. Economic compensation seems to motivate the training efforts of the RUs.	
Estonia	No special measure has been taken to ensure the return on investment.	
Finland	No special measure have been taken as most of the train drivers are employed by VR Company.	Limited impact on the employment market. Since the introduction of the Directive, one train driver from another Member State has asked the possibility to work in Finland as a train driver.
France	No national measure for reimbursement of investment cost. RU/IM manage themselves this issue.	
Italy	A decree has been approved to avoid to lose the investment cost.	
Latvia	No measure for the cost of the training as each RU deals with this situation by its own provisions.	
Lithuania	RU and IM can sign a contract and train driver has to pay the training cost of the preceding year if the train driver leaves the company.	
Luxembourg	A mechanism of amortisation over a period of 4 years is foreseen by labour law.	
Norway	As training for the licence is public, open to all and funded by public grants, there is no measure taken to ensure investment costs on drivers.	
The Netherlands	The investment cost issue has been delegated to the companies.	
Poland	RU or IM can sign a contract by which the driver will have to return all or part of the cost of the training if the termination of the contract takes place before the date specified in the contract.	The Polish NSA believes that there will be an impact on the train driver market but that it is too early to assess.



Slovakia	When a train driver has changed employer, the new employer shall be obliged to pay the former employer, at his request, a proportional amount of costs probably incurred during the certificate obtention.	
Slovenia	No measure has been taken to ensure investment costs on drivers.	
Sweden	The investment cost in training is left to the decision of the driver and the employer. One solution is a written agreement following labor rules.	In international traffic, there has been difficulties associated with the transition to the new rules. Different interpretation of the rules and in their applications have made cross border traffic more difficult according to certain companies. There have also been individual drivers that has started to work for RUs in other Member State that have experienced barriers due to different interpretation in the application of the new rules. For instance, Sweden, Norway and Germany have chosen different deadlines for when licences and certificates are required.
United Kingdom	No measure has been taken to ensure investment costs on drivers.	Some small evidence that those RUs which pay higher salaries attract existing drivers from other RUs due to their competence /skills but not due to a higher level of education.

Finally, the stakeholder organisations have made some detailed comments on mobility and return on investment costs:

- Deutsche Bahn informed that article 24 of Directive 2007/59/EC has not been transposed in German law. However, Deutsche Bahn has not perceived any change since the introduction of the Directive on the employment market and mobility.
- ALE explained that, in Spain, a train driver needs to remain in the IM or RU at least two years. ALE has perceived an increase in the mobility between private companies since the introduction of the Directive 2007/59/EC.
- For SNCF, when a driver leaves the company, he/she has to pay a training penalty which is a fixed price calculated according to the received training and to the duration of the commitment remaining to be made. SNCF has noticed no change in terms of mobility since the introduction of the Directive. The working conditions have to be more harmonised in order to improve the effect of this measure.
- In Czech Republic, the labour code allows to employee to change employer. For CD, every starting driver who got training has an obligation/commitment to stay within this RU for five years.



- SNCB explained that the possibility to ask for a compensation is integrated in the Belgian Law.
- Trenitalia explained that the Ministry of Infrastructure and Transport has decided that if a driver, after having received the training, leaves the company before 4 years after the appointment, to be hired by another company, the new company has to pay back to the first company the training cost (4000€ for the licence and at least 13000€ for the certificate).

2.5.2. Quality standards

Member State	Sentence/Fine	Reason
United Kingdom	Health and Safety at Work Act 1974 sets out the offences for which penalties could be made on summary conviction. It can be up to 3 months of imprisonment	False declaration for instance is part of the offences considered.
Slovakia	Fine from 1000 to 20000€	Failure to comply with defined criteria
Slovenia	Fine from 3000 to 25000€	Entities without recognition of training centre
Norway	Penalties in accordance with Railway Law. It can be fines or even jail.	
Italy	A specific article of the act transposing Directive 2007/59/EC has been dedicated to the issue of fines.	
France	Fines up to 75000€ and one year of jail	
Germany	Fines up to 50000€ Fines up to 10000€	Driving without a licence Training without recognition
Czech Republic	Penalties can be issued	Certificate is issued without following the legal requirements; RUs do not organise regular inspections of drivers; RUs do not have the CCR; RUs have a driver without valid confirmation of medical fitness.
Belgium	A list of penalties have been defined by Law	
Austria	Fines up to 2180€	
Spain	Fines up to 15000€	

The comments on quality standards are very much heterogeneous which makes it difficult to conclude on this topic. In the United Kingdom, there is an independent assessment of the activities associated with training, skills assessment and examination of train drivers and the system for issue of certificates and licences. The British NSA assesses these quality standards through the evaluation of the SMS. The Italian NSA informed that a system and process of audits, supervision of examination boards, traceability of training processes, sample checks on



certification conformity of the documentation transmitted for the licence application have been put in place. Most of the other NSAs were referring to the supervision for assessing the quality standards. The French NSA controls them through safety certification and authorisation. The Czech NSA organises regular inspections and the RUs must notify the dates of examination. The German NSA has published an internal NSA guide and regular supervision of the NSA for quality standards are organised. The Belgian NSA informed that the inspections represent 5 man/year. As for the Swedish NSA, both supervision on paper and by visiting the companies are foreseen. Finally, the Bulgarian NSA informed to be certified according to ISO 9001-2008. The Dutch NSA has set a quality standard for the examination centre (ISO 9001).

Two NSAs have not implemented any specific measures (NSAs Slovakia and Denmark). However, the Danish NSA explained that internal good administrative practices are followed and external supervision and inspections relating to the certificate organised.

2.6. General comments

Some NSAs and stakeholders organisations have provided the Agency with some general comments on the Directive 2007/59/EC:

- The British NSA explained that a new evaluation of the actual implementation of the Directive 2007/59/EC should be done after 2018 when the licensing scheme will be fully in force. A new article should be inserted in this Directive in order to take into account this request;
- The Danish NSA would like that a guidance to the Directive 2007/59/EC to be developed on key elements;
- The Spanish NSA considers that more work has been done on the features than on the content. In the view of harmonising, the content is fundamental and should be targeted;
- The Swedish NSA explained that the copy of the complementary certificate is not actual copy but a new document which adds significant administrative works and costs;
- The Swedish NSA stated that, in case a licence is suspended, the driver's employer shall be informed according to article 29 of the Directive. However, the Swedish NSA does not have registered information about where the driver works, as this is not required. This delivery of information cannot be then guaranteed;
- CGT demands a better preventive medicine in case of pregnancy or long time illness. Renewal, seen as penalty, especially in case of pregnancy, must be removed. For France, where a strong occupational medicine exists, the Directive must reassert the important function of occupational medicine in the certification of French drivers with yearly rate.
- CGT demands that minimum of training hours appears in the Directive and to be more precise on the professional knowledge to obtain a licence.
- SNCB explained that with the current Directive 2007/59/EC, there is a lot of room for interpretation, allowing Member States to transfer this Directive in various way in their national legislation. In case of a RU working in various Member States, either in partnership or in open access, this complicates highly that RU's work and results in additional costs as to a situation where every Member State would have identical legislation (example of aviation sector where European legislation is introduced by means of regulation instead of directive).
- Società viaggiatori Italia considers that in case a licence has been stolen or lost, it should be possible to get immediately a temporary licence while waiting for the official duplicate. For the time being, the companies are waiting one month the duplicate while during this period the train driver cannot work.



- VDV considers that continued use of the terms RU and IM throughout Directive 2007/59/EC as possible employers of train drivers is in principle correct as European Law allows IMs to operate trains on its own for its own purposes. Nevertheless, when operating a train there is an interaction between IM and RU as described for instance in TSI OPE. In order to avoid any misunderstanding in Directive 2007/59/EC, VDV proposes to consider only the RU and to add in article 3 e) of this Directive that all provisions to RU also apply to IM if they employ or contract train drivers for IM's purposes.
- VDV considers that article 4.2 should be modified as the exceptions listed are too narrowly limited.

SNCF explained that with the reading of the legal transposition of the Directive in the various Member States, confirmed by the existing relations between RUs acting as cooperation, that the conditions, times and criteria of delivery of the licence are absolutely not common nor harmonised. This is in total contradiction with the aim of the Directive and leads to a discrimination between RUs and drivers in the European Union. In addition, certain provisions from the Directive are prone to interpretation because they are too vague or contain errors.

ATOC considers that a review of the way in which the terms 'Category A driver' and 'Category B driver' are used within the Directive. While the distinction between those two categories serves little purpose in the Directive as currently worded, ATOC believes that these categories should be retained, in order to provide a way in which different medical requirements can be mandated. The Directive currently requires every driver to meet the same medical requirements – however, it has long been the practice in the UK that the medical requirements for shunt drivers are specified less stringently. ATOC would like this principle to be retained for shunt drivers – because it reduces an RU's costs, by giving them a suitable role into which an already-employed driver can be placed if his health, while still reasonable, deteriorates a little and thus no longer meets the high standard required for mainline drivers. In ATOC's view, it does not make economic sense to dismiss these highly-trained staff when they could competently and safely still be used for shunt driving.

CER expressed five main concerns:

- Monocular vision should not be accepted under any condition;
- Clarification of the status of the psychological aptitude assessment;
- Possibility of "continuous control system" to maintain the certificate valid;
- Clarification of the language but level B1 only for oral competences;
- Harmonised criteria for the recognition of doctors and psychologists.

CER explained that the harmonisation of the delivering conditions of licences must be significantly improved.

ETF informed that the German trade unions demand full implementation of the EU directive and full application to all drivers in Germany as some irregularities have been noted. ETF also noticed that the French trade unions consider that the national implementation would allow the existence of self-employed (independent) drivers. This is fully opposed by the unions as it is the company's responsibility to ensure that the staff they use have the necessary competences (SMS) and the complementary certificate is issued by the companies for their staff.

ETF expressed two main concerns:

- Definition of minimum training hours in order to ensure a good quality initial training. Active train drivers clearly question the quality of the training and the level of



competences of drivers with short training periods. There is a huge danger that they are not able to act appropriately in degraded situations and other concerns. The definition of a training curriculum is important because with the huge variety of training periods there are serious doubt about the content of the training and its quality. A train driver profession is not a profession that can be learnt quickly by training on the job. In this respect, the requirements regarding general professional knowledge, rolling stock and infrastructure knowledge are considered too general leaving too much space for interpretation.

- Control of the existence of the certification documents, in particular the complementary certificate: there is an impression that this requirement is not always taken seriously and that drivers are driving without the necessary qualification and certification. In particular in cross border driving the control is a problem.



3. Proposals for improvement

The Commission should receive with this report not only an overview on experiences made so far concerning the implementation of the European certification scheme for train drivers but also an evaluation of such experiences. This report also indicates those provisions and elements which might be subject of revision in order to improve the system or to adapt it to latest developments.

The Agency gathered experiences and feedback during 5 years of accompanying the implementation process in the Member States. In many discussions with different stakeholders, ERA learnt about benefits and advantages as well as difficulties and challenges, inconsistencies and weaknesses of the system. In addition a comprehensive questionnaire survey was conducted in April-May 2013 gathering facts and figures as well as opinions with reference to the 31st of March 2013. Based on this knowledge, the Agency concluded in a number of proposals showing potential for improvements. This chapter provides an overview of the legislative provisions of Directive 2007/59/EC and of related documents (EC Regulation (EU) 36/2010, EC Decision 2010/17/EC, EC Decision 2011/765/EU and EC Recommendation 2011/766/EU) affected by the proposals of this report.

Different legislative procedures apply to amendments to Directive articles on the one hand and to Directive annexes or to supplementing non-legislative acts of the Commission on the other hand. Both procedures differ remarkably on the preparatory work and the duration of processes. In order to underline these differences, the list of proposals (chapter 3.2) distinguishes between proposals requiring a 'legislative act' and referring to Directive provisions (chapter 3.2.1) from those requiring a 'non-legislative act', manageable by the Commission with support of the Committee (RISC) and with consultation of the European Parliament, if appropriate (chapter 3.2.2).

Notwithstanding that proposals by their nature differ certainly in regard to significance, urgency or importance of the intended change, the Agency suggests to the Commission to follow an holistic approach addressing all the aspects listed, when considering the appropriate follow up activities.

3.1. Overview of main areas affected by the proposals

The proposals for improvement can be grouped around three main areas: proposals referring to general aspects of the certification scheme, to the train driver licence and to the certificate.

Improvements referring to general aspects of the certification scheme

Several proposals of this group concern more formal aspects. They will not change the procedures and standards set by the certification scheme as such. But they are required to clarify for example the scope of application, which should be (re-)adjusted to the definition of scope of the RSD and the definition and use of specific terms. Furthermore it is proposed to have a second evaluation report after the end of the implementation period end of 2018.

Two further proposals belong to this group: Art. 17 requests that RUs/IMs inform the NSA in case cessation of a work contract with a train driver. The purpose of this provision and the handling of this kind of information in the NSA is not clear and requires further analysis and appropriate amendment to clarify the situation. Finally the question of the geographic scope of validity of



statements of recognition as well as of statements issued by persons or bodies recognised under the conditions of the TDD needs clarification. The certification scheme presumes a mutual acceptance of licences and certificates (within their defined scope of authorisation) on the one hand but gives no clear indication regarding a mutual acceptance of recognitions provided under the conditions of the TDD on the other hand. May for example a doctor recognised by the NSA of MS A be accepted to examine train driver applicants in/from MS B?

Improvements referring to the licence

More than half of all proposals (11 proposals) refer to the licence. 7 of them concern different aspects of the medical or psychological fitness examination. Apart from some specific requirements for example regarding vision ability and cases requiring supplementing examination, some general weaknesses are addressed as well. The frequency of psychological testing must be clarified as well as it is proposed to evaluate the development of some common criteria for the recognition of doctors and psychologists. Furthermore it should be considered to care for guidance in respect to 'excluding diseases'. Diseases which should exclude a train driver (or applicant) from passing the examination respectively from continuing driving trains.

Inconsistencies were found in regard to Article 11.1, which refers to a Council Decision repealed since several years, and in regard to Annex I of the TDD, in which the title of section 4 obviously seems to include a mistake, requiring correction.

More general proposals for improvements in this group propose to develop further harmonised criteria for examinations assessing the general professional competence required to obtain a licence (Annex IV of TDD), to consider provisions avoiding double issuance of licences and improvements concerning the licence register parameters.

Improvements referring to the certificate

In regard to the certificate, it is proposed to review the definition of categories, in particular of category A, and of the provision requiring the NSA to recognise persons or bodies for language training and assessment, taking into account that NSAs usually do not have the required competence for this task. Experiences show that also Article 4.2 on the exemptions regarding the obligation that a train driver, when driving a train, must be in possession of the respective authorisation for the rolling stock and the infrastructure – e.g. in training or examination situations – need a review aiming to extend the provision.

Furthermore there is evidence that certain specifications concerning the layout of the certificate as well as of the 'certified copy of the certificate' should be improved to better meet the needs in practice and in order to incorporate latest developments on the use of new technologies.

Finally, the description of train driver competences regarding rolling stock and regarding infrastructure on the certificate and in the registers (CCRs) is source of major concern in the sector. The level of detail and the method applied in this respect differ largely between MSs. This is not only an obstacle for mutual recognition in case of cross border services but as well creates uncertainties and unacceptable differences concerning the effort to be taken in regard to the periodic checks provided for in Article 16 and Annex VII.



Proposals grouped around main areas of the certification scheme

Area I = general II = licence III = Certificate	No 1)	Ref	Content of proposal
I. - GEN	1	Art 2.3	Re-adjusting to RSD scope
I. - GEN	2	Art 3	Supplementing missing definitions/ review of wording
I. - GEN	8	Art 17	Clarification of purpose of information on cessation to NSA and review of provision (incl follow up amendment to CD2010/17/EC as appropriate)
I. - GEN	10	Art 33	New implementation report 2018+
I. - GEN	18	CD 2011/765/EU	Geographical scope of recognition / statements
II. - LIC	5	Art 0	Provision regarding place of application and avoidance of double application
II. - LIC	6	Art 11.1	Clarification regarding reference to repealed Council Decision
II. - LIC	7	Art 16	Frequency of psychological checks, wording
II. - LIC	11	Ax IV	Harmonised examination criteria
II. - LIC	12	Ax II	Guidance on excluding diseases
II. - LIC	13	Ax II	Relevance of certain vision aspects
II. - LIC	14	Ax II	Review of cases for supplementing examinations
II. - LIC	15	Ax II	Point 2.2 to be revised, criteria for examination
II. - LIC	16	Ax II	Include aspect of post traumatic support
II. - LIC	17	Ax II	Recognition criteria for doctors/psychologists
II. - LIC	21	Ax I	Solving inconsistency in title section 4 + review of certain parameters taking experiences into account (incl follow up amendment to EC Dec 2010/17/EC)
III. - CERT	3	Art 4.2	Exemptions: review and supplements
III. - CERT	4	Art 4.3	Review definition of categories (including follow up amendments to CR (EU) 36/2010)
III. - CERT	9	Art 23.5	Recognition needs concerning language training and examination (including follow up amendments to CD2011/765/EU)
III. - CERT	19	CD 2010/17/EC	Guidance on describing/registering RST + Infrastructure competence
III. - CERT	20	CR (EU) 36/2010	Review layout certificate + copy of certificate + use of new technologies

1) number of proposal according to list of proposals chapter 3.2

3.2. List of proposals

3.2.1. Proposals to amend Directive articles (Legislative act)

Article 2 (3) – Scope / Options for exemption

The scope of Directive 2007/59/EC, in particular article 2 paragraph 3 on options for exemption, has been developed in order to be in conformity with the scope of Directive 2004/49/EC. Meanwhile, the Safety Directive has been amended by Directive 2008/110/EC including its scope. Even if no major concern has been expressed by the sector, ERA considers that the scope of Directive 2007/59/EC should be evaluated in order to take into account the new developments in



the Safety Directive. This is important since basic application principles are closely linked to key elements of the Safety Directive – e.g. reference to RUs/IMs having a safety certificate respectively a safety authorisation.

Proposal 1

Art. 2(3) – scope

Action: verification if the scope is still appropriate considering the changes brought to the Safety Directive.

Article 3 – Definitions (and coherent use of terms)

Not all the relevant terms used in Directive 2007/59/EC are defined in its article 3. In some cases, the different interpretation of the terms used in the Directive may lead to inappropriate implementation. Furthermore it seems that different terms are used to describe the same thing - for instance 'skills', 'competence', 'knowledge' or 'examinations', 'checks', 'tests'. There is also a lack in the definition of the terms recognition and accreditation.

In particular, the differences between periodic checks and examinations is not understood and therefore not implemented in harmonised way throughout the European Union. Respective definitions in Article 3 of Directive 2007/59/EC should be considered. Article 16 title "periodic checks" is used only in article 16.3. Otherwise, the terms "periodic examinations and/or tests" or 'medical checks' are used more frequently in the core text of this article. This leads to an uncertainty concerning the quality of "periodic checks" in comparison with the initial examinations. In order to cope with these uncertainties, ERA proposes to draft article 16 again and to care for a coherent use of these terms.

Proposal 2

Art.3 – definitions

Action: Analysis if additional definitions are needed in Directive 2007/59/EC. Clarification of use of different terms for comparable subjects. Review of wording in this respect – in particular Art 16.

Article 4.2 – Exemption to hold a certificate for a specific part of the infrastructure

Several aspects are to be considered concerning this article. The list which allows train drivers to operate under certain conditions without being in possession of a certificate for the respective infrastructure seems to be incomplete as it does not cover all cases required in practice e.g. driving work trains or historical trains. Furthermore, situations must be considered, where rolling stock competence might not yet be ascertained, e.g. in the case of training/examination. The list should be reviewed in order to comply with the operational practice in a better way.

Art. 4.2 provides that second driver "sits next to the driver during driving" while, for certain type of traction unit, there is no possibility to "sit next to the driver". More generally, there is usually



no obligation at all for a train driver to sit during driving a train. This sentence needs to be rephrased in order to avoid confusion at operational level.

Finally, the last sentence of art. 4.2 states that “whenever an additional driver is used as provided for above, the infrastructure manager shall be informed beforehand”. The meaning of this provision appears unclear and there is no specification on the purpose of such information or to which extent it can be used by the infrastructure manager.

Proposal 3

Art. 4.2 – Community certification model

Review of Article 4.2. following the considerations above, which might lead to:
Action 1: review the list of exemptions.

Action 2: amendments needed to this article:

- “[...]provided that another train driver who possesses a valid certificate for the infrastructure concerned ~~sits next to~~ *accompanies* the driver during driving [...]”;
- “[...] ~~Whenever an additional driver is used as provided for above, the infrastructure manager shall be informed beforehand~~”.

Action 3: Clarification of the driver in charge.

Article 4.3 – Categories of drivers

While the definition of category B driver is clear as it embraces drivers carrying passengers and/or goods, the definition of category A is not so clear. The reference to the rolling stock is not considered as sufficient enough to specify efficiently category A driver. In fact the provision neglects that the justification for using category A is rather linked to simplified or limited operational conditions than to the type of rolling stock. Following the point of view of some stakeholders, added value of having categories of drivers could be questioned in general.

Proposal 4

Art. 4.3 – Community certification model

Action: The definition of the categories of drivers should be reviewed. Follow up amendments to Commission Regulation (EU) No 36/2010 required.

One licence per train driver

The idea of a European licence and the provisions regarding supervision or suspension implies that a train driver shall have only one licence. However, there is no clear provision in Directive 2007/59/EC which forbids having more than one licence (issued in several Member States). Furthermore, it is not specified whether there should be a link between the place of residence of a train driver and the competent authority concerned for issuing the licence. Although there is already general agreement in the sector that the described principles apply, a clear provision would be appreciated in order to avoid uncertainties.



Proposal 5

Action 1: Analysis of an additional provision to make clear that only one licence can be issued per train driver.

Action 2: Consideration of link between application for licence and place of residence.

Article 11.1 – Basic training equivalent to level 3 of Council Decision 85/368/EEC

Article 11.1 states that applicants shall have successfully completed at least nine years' education (primary and secondary) and have successfully concluded basic training equivalent to level 3 referred to in Council Decision 85/368/EEC of 16 July 1985 on the comparability of vocational training qualifications between the Member States of the European Community. However, this Decision has been repealed and its application – although legally still valid - is not clear to the NSAs. Furthermore, doubts have been expressed in some cases on the appropriateness and necessity of such requirement. Finally, in this frame, the option to take the professional experience into account, in order to compensate insufficient school or professional (pre-)education would be reasonable.

Proposal 6

Art.11.1 – Basic requirements

Action: Replace reference to the repealed Decision by a direct specification of the required education. Furthermore, consideration of the options to compensate by work experience.

The other option would be to delete this basic requirement.

Article 16 – Periodic checks

A particular problem relates to psychological checks. While Article 16 provides that train drivers shall undergo periodic checks of the psychological requirements, there is no minimum frequency specified in Directive 2007/59/EC. This leads to different practices in the Member States. Also general doubts on the necessity of frequent checks of the psychological requirements were expressed. The Agency proposes to further analyse this aspect and to consider the limitation to initial examinations concerning the psychological requirements.

Proposal 7

Art.16 – Periodic checks

Action: Further analysis of appropriateness of frequent psychological check and consideration of deletion of reference to article 11.3 in article 16.1.



Article 17 – Information on cessation of employment

According to article 17, when a driver ceases to work for a railway undertaking or an infrastructure manager, it shall inform the competent authority without delay. However, the licence does not require any information related to the employment status and shall remain valid anyway, provided that the conditions in article 16.1 remain fulfilled. Furthermore, the national licence register does not assume any entry about such information. The situation for the NSA is unclear as they have an uncertainty on the use of such information. Besides, no information related to the beginning of a driver's contract of employment with a railway undertaking or an infrastructure manager is foreseen. Based on this unclear situation, some NSAs developed their own system of information and registration regarding the employment status of train drivers. The first paragraph of article 17 should be revised in order to clarify the responsibilities and the purpose of this provision. A link to article 18 on "monitoring of drivers by railway undertakings and infrastructure managers" and article 29 on the "controls by the competent authority" might be considered in this context.

If amendments based on such analysis lead to a regular submission of information about employment contracts to the competent authority, corresponding amendments to Commission Decision 2010/17 on Basic parameters for registers for train driving licences and complementary certificates are required.

Proposal 8

Art.17 – Cessation of employment

Action: Revision of first paragraph of article 17 and analysing of potential link to article 18 and 29 including the option of deleting this requirement. Follow up amendments to Commission Decision 2010/17/EC.

Articles 23.5 and 25.2 – Linguistic skills

According to articles 23.5 and 25.2 of Directive 2007/59/EC, training tasks and examinations related to linguistic knowledge shall be performed by persons or bodies accredited or recognised according to article 20. However, the NSA does not have the experience and competence to recognise language training schools. Besides, the alternative measure of accreditation, is not applied to the very specific area of language training and competence assessment. This creates difficulties for the recognition of the train drivers' linguistic competences. A first attempt to solve this problem was undertaken when drafting respective provisions for a recommendation of the Agency to the Commission on the "procedure for recognition of training centres and of examiners of train drivers in accordance with Directive 2007/59/EC [...]" submitted in 2010. This provision was approved as part of EC Recommendation 2011/766/EU. However, the EC Recommendation is a relatively soft legal measure and cannot replace a clarification directly in the Directive.

Respective amendments need to be supplemented by corresponding review to Commission Decision 2011/765/EU and Commission Recommendation 2011/766/EU on criteria for the recognition of training centres and on the procedure of recognition.



Proposal 9

Art.23.5 – Training and Art.25.2 – Examinations

Action: Developing amendments to allow recognition of the language training schools and linguistic examiners treated separately and in line with specific characteristics of the national language regulations and training market. Follow up amendments to Commission Decision 2011/765/EU and Commission Recommendation 2011/766/EU are required.

Article 33 – Report

Considering the phasing-in procedure assuming full implementation of the Directive by end of 2018, this report on the development of the certification of train drivers can only cover experiences based on the first phase of implementation. At the time when this report has been drafted, the second phase of the certification of train drivers in accordance with Directive 2007/59/EC was just started with the certification of all new train drivers. It has been proposed to perform a second evaluation at the end of the phasing-in process not before 2019. ERA fully supports this idea.

Proposal 10

Art.33 – Report

Action: Amend article 33 in order to mandate the Agency to perform a second report at the end of the implementation of Directive 2007/59/EC.

3.2.2. Non legislative acts

Licence

General professional knowledge

Annex IV of Directive 2007/59/EC on general professional knowledge and requirements regarding the licence is broadly considered as too vague to reach the objective of harmonised training. This issue has already been tackled in 2010-2011 and ERA produced an advice containing proposals to improve this Annex. This advice has received a strong support from the Working Party and this support has been repeated in the answers to the questionnaire for article 33 report. Despite the possibility to adopt the proposals contained in this advice and to revise Annex IV of the Directive, some concerns have still been expressed regarding the comparability of the implementation of the requirements related to the general professional knowledge throughout the Member States. In order to increase the trust in the licensing scheme, it has been proposed to consider harmonising criteria for the examination of the general professional knowledge.



Proposal 11

Annex IV – General professional knowledge and requirements regarding the licence

Action: Study the possibility to develop harmonised criteria for the examination related to the general professional knowledge.

Medical requirements

To support the development of improvements regarding medical requirements following proposals 12–16 a study on intermodal comparison related to comparable aspects should be undertaken, taken into account the different technology used in other modes of transport.

Annex II point 1.1 requires the train drivers not to suffer from any medical conditions which are likely to cause sudden incapacity. However, there is no methodology to evaluate the risks of sudden incapacity which can create some problems while assessing this requirement.

Proposal 12

Annex II point 1.1 – General requirements

Action: Study the possibility to establish guidance on excluding diseases to be up-dated regularly by a supporting advice group to be established.

Annex II point 1.2 related to vision requirements seems to create problems on some particular items like, for instance, the difficulty to assess the sensitivity to contrasts and the ability to withstand dazzle. These difficulties should be studied in more details and, if appropriate, a revision of certain elements of Annex II point 1.2 should be performed.

Proposal 13

Annex II point 1.2 – Vision

Action: Evaluate the relevance of some requirements and the appropriateness of their revision.

The last paragraph of Annex II point 3.1 specifies that the physical fitness must be checked after any occupational accident or any period of absence following an accident involving persons and a medical doctor can decide to carry out an additional appropriate medical examination after a period of at least 30 days' sick leave. Many doubts have been expressed concerning the necessity of such requirements. It was considered that after an accident involving persons, a train driver would need a psychological support rather than a physical check that is often perceived by the driver as a sanction. The relevance of requesting an additional examination after any period of 30 days' sick leave is not clear and should be clarified. Furthermore, whenever the physical requirements are checked, it should be considered as a periodic check.



Proposal 14

Annex II point 3.1 – Supplementing medical examinations

Revision of Annex II point 3.1 aiming at improving provision taking into account the consideration mentioned above. This might in particular result in:

Action 1: Replacement / Deletion of the requirement to organise a physical fitness examination after any period of absence following an accident involving persons.

Action 2: Study the relevance of the other requirements and recommend a revision of this part of the Annex if considered necessary.

Psychological requirements

Annex II point 2.2 on occupational psychological requirements contain no specific requirements in order to assess the psychological fitness of the candidate train driver. Furthermore, some requirements of the medical tests seem to be more related to the psychological examination like, for instance, the cognitive requirements. In general, this lack of specifications in the psychological examination has been considered as a critical issue. The licence being valid throughout the EU, the same requirements shall apply to all licensed drivers which is not fully the case concerning psychological examinations.

Proposal 15

Annex II point 2.2 – Assessment criteria for occupational psychological examinations

Action: Annex II point 2.2 should be revised in order to better define the content and role of psychological examinations.

As explained in the paragraph related to Annex II point 3.1, the obligation to perform physical fitness test after any period of absence following an accident involving person is perceived as a sanction by the train driver. This requirement can even lead to negative counter-effect of train drivers continuing to perform their duties in order to avoid this medical examination. In this situation, the added-value of having this medical examination is questionable. The train driver needs more a psychological support or post-traumatic treatment in order to continue performing his/her job efficiently and on the long term. That is why the Agency proposes, apart from the deletion of the obligation to have medical examination after any period of absence following an accident involving person, to add an obligation of psychological support to the driver after any accident involving the death of a person.



Proposal 16

Annex II – Medical requirements/Post trauma support

Action: Amendment of Annex II in order to include the obligation for the employer to offer psychological support to a driver who has faced an accident involving the death of a person.

Recognition

Recognition of medical doctors and psychologists

Directive 2007/59/EC requires medical doctors and psychologist to be recognised or accredited. However, no common criteria have been defined to perform this recognition. In order to achieve the goal of a common licence scheme for all drivers, it has been acknowledged that a minimum set of common criteria for the recognition of medical doctors and psychologists is required.

Proposal 17

Annex II or Commission Decision 2011/765/EU – Criteria for the recognition of medical doctors and psychologists

Action: Developing common criteria for the recognition of medical doctors and psychologists. Previous version of TSI OPE already contained such criteria. They might be considered as appropriate solution.

Geographical validity of the recognitions

Currently, there is no provision stating the geographic scope of validity of a statements of recognition issued to persons or bodies in accordance with Article 18 of Directive 2007/59/EC. Nevertheless, the experts of Article 35 Expert Group have acknowledged that such statement should have an EU wide validity. Considering that the certification scheme implies a mutual recognition of documents issued based on the (training and) assessments performed by recognised persons or bodies, it appears to be a relevant conclusion. Clarification in the legislation is recommended to avoid remaining uncertainties. Without prejudice to further legal evaluations, the appropriate document seems to be the Commission Decision 2011/765/EU.

Proposal 18

Commission Decision 2011/765/EU – Geographical validity of recognitions

Action: Develop an amendment to Commission 2011/765/EU clarifying the geographical validity of recognitions and analyse the implications on action 2 in proposal 5.



Certificate

Information on rolling stock and infrastructure competences

The terminology used to describe the rolling stock and infrastructure competences of train drivers differs from one legal act to another. Indeed, in Annex V of Directive 2007/59/EC, it refers to “professional knowledge of rolling stock respectively of infrastructure and requirements regarding the certificate. Decision 2010/17/EC refers to the “rolling stock/infrastructure on which the driver is authorised to drive” and, finally, Commission Regulation (EU) 36/2010 refers to “each type of rolling stock/extent of infrastructure”. The way this competence is described on the certificate differs from Member States to Member States and sometimes even from company to company within the same Member State. Some Member States have developed their methodology to describe this competence on the certificate. However, if the objective is to increase the trust in the certificate and to foster its mutual recognition, it is necessary to take some actions in order to facilitate the understanding of the description of rolling stock competences on the certificate. This task is of high importance also because of its indirect impact on the number of ‘periodic checks’ performed in accordance with Article 16 and Annex VII of Directive 2007/59/EC and depending on the fineness of the classification of types or lines applied.

Proposal 19

Directive 2007/59/EC Annex V – Professional knowledge of rolling stock and requirements regarding the certificate and Annex VI – Professional knowledge of infrastructure and requirements regarding the certificate

Decision 2010/17/EC – Data format for the complementary certificate register

Regulation (EU) 36/2010 – Data relating to rolling stock

Action: Analysing options to specify the description of rolling stock and infrastructure competences on the certificate in a consistent way and draft guidance at EU level.

Layout of the certificate, copy of certificate and use of new technologies

Several problems have been reported concerning the layout of the certificate which is considered ineffective. The format is too small and too costly while an A4 format would have been more efficient from a practical and an economical point of view. In addition the concept of an exclusively paper based document seems to be outdated as it ignores economic potentials that recent IT developments could provide. Some Member States already consider replacing this paper based approach by an appropriate electronic tool or even use electronic application in parallel to the paper document.

In column 8 of Annex II point 4 of Commission Regulation (EU) 36/2010, a mistake appears as it is written “extension” instead “description”.

Besides, some information that are mandatory for the certificate are questionable e.g. photo, signature. A review might be considered.

Considering Annex III of Commission Regulation (EU) 36/2010 on the ‘Community model of certified copy of complementary certificate’, the certified copy of complementary certificate is in



fact not a copy but a complete new document. From a mobility point of view, it is acknowledged that a certified copy of a complementary certificate should provide information related to the rolling stock competences and infrastructure knowledge of the train drivers in a harmonised way. But according to some stakeholders and NSAs, a more efficient solution would be preferable. This might be a real 'copy' of the certificate having identical layout but clearly marked as 'copy' to be not misused. Alternatively a defined extract of the complementary certificate register might be considered as well.

Proposal 20

Regulation (EU) 36/2010 – Annexes II and III

Action 1: Options and consequences of opening up the certification system for electronic devices should be analysed and, as appropriate, amendments to Annex II of Regulation (EU) 36/2010 should be developed.

Action 2: Correction of error in certification layout. Review of information to be displayed on the certificate and registered in the NLR.

Action 3: Analyse the possibility to use a 'real copy' of the certificate or a defined extract from the CCR for the purpose of the 'certified copy of complementary certificate' and draft, as appropriate, amendments to Annex III of Regulation (EU) 36/2010.

National Licence Registers

Annex I point 4 of Directive 2007/59/EC refers, according to its title, to "minimum data contained in national registers" and lists under point a and b data relating to the licence as well as to the certificate. However, article 22 of the same Directive distinguishes between:

- Data referring to the licence to be registered by the competent authorities in art.22.1;
- Data referring to the certificate to be registered by each railway undertaking and infrastructure manager in art.22.2.

This distinction is repeated in Decision 2010/17/EC. This inconsistency creates misunderstandings on the scope of the national registers of train driving licences (NLRs) and should be solved.

Member States have developed individual solutions for the NLR based on the requirements contained in Decision 2010/17/EC. Several problems have been experienced concerning register specifications. E.g.: no information concerning the employer, methodology developed by the competent authorities to get the information periodic medical checks, optional data that should be compulsory and many detailed problems that have been described in Chapter 2 of this report.



Proposal 21

Annex I of Directive 2007/59/EC, title of point 4 ‘Minimum data contained in national registers’ and Annex I of Decision 2010/17/EC – National register of train driving licences

Action 1: Review of the provision in order to solve current inconsistency with Article 22.

“4. Minimum data contained in national registers

(a) Data relating to the licence *registered in the NLRs*:

[...]

(b) Data relating to the certificate *registered in the CCRs*:

[...]”

Action 2: Annex I of this Decision should be subject to a revision in order to take into account the abovementioned problems.

3.2.3. Overview table of the proposals for improvement

No ¹⁾	leg. Act ²⁾	non - leg act ²⁾	Area I = general II=licence III = Certificate	Ref	Subject	Content of proposal	con tent ³⁾	for m ³⁾
1			I. - GEN	Article 2.3	Scope	Re-adjusting to RSD scope		
2			I. - GEN	Article 3	Def. +Terms	Supplementing missing definitions/ review of wording		
3			III. - CERT	Article 4.2	Scope	Exemptions: review and supplements		
4			III. - CERT	Article 4.3	Categories	Review definition of categories (incl follow up amendments to CR (EU) 36/2010)		
5			II. - LIC	Article 0	Application	Provision regarding place of application and avoidance of double application		
6			II. - LIC	Article 11.1	Basic requir.	Clarification regarding ref to repeal Council Decision		
7			II. - LIC	Article 16	Exam Psych	Frequency psychological checks, wording		
8			I. - GEN	Article 17	Cessation	Clarification of purpose of information on cessation to NSA and review of provision (incl follow up amendment to CD2010/17/EC as appropriate)		
9			III. - CERT	Article 23.5	Language	Recognition needs concerning language training and examination (incl follow up amendments to CD2011/765/EU)		



10			I. - GEN	Article	33	Report	New implementation report 2018+		
11			II. - LIC	Annex	IV	Prof. comp.	Harmonised examination criteria		
12			II. - LIC	Annex	II	Exam Med	Guidance on excluding diseases		
13			II. - LIC	Annex	II	Exam Med	Relevance of certain vision aspects		
14			II. - LIC	Annex	II	Exam Med	Review of cases for supplementing examinations		
15			II. - LIC	Annex	II	Exam Psych	Point 2.2 to be revised, criteria for examination		
16			II. - LIC	Annex	II	Exam Psych	Include aspect of post traumatic support		
17			II. - LIC	Annex	II	Exam Med	Recognition criteria for doctors/psychologists		
18			I. - GEN	CD 2011/765/EU		Recognition	Geographical scope of recognition / statements		
19			III. - CERT	CD 2010/17/EC		Prof. comp.	Guidance on discribing/registering RSt + Infrastructure competence		
20			III. - CERT	CR (EU) 36/2010		Layout	Review layout certificate + copy of certificate + use of new technologies		
21			II. - LIC	Annex	I	NLR	Solving inconsistance in title section 4 + review of certain parameters taking experiences into account (incl follow up amendment to EC Dec 2010/17/EC)		

- 1) number of the proposal in regard to the full list of proposals in chapter 3
- 2) indicates whether a legislativ or non-legislative act is required to follow this proposal
- 3) indicates whether the proposal has a qualitative aspect on the certification scheme or rather refers to formal aspects



4. Considerations regarding next steps

Regarding follow up activities the Agency recommends to the Commission to consider following steps:

1. In order to implement proposals 1 to 10 the Commission should draft a European Directive aiming to amend Directive 2007/59/EC. In this context the Commission may request the assistance of the Agency in accordance with Article 21b of the Agency Regulation. The request for assistance may include a request to coordinate involvement or consultation of the sector as appropriate, aiming to find solutions that meet well the concerns and needs in practice.
2. The Commission should mandate the Agency to develop ERA recommendations to transpose proposals 11 to 21. To this end the Agency may establish working parties or task forces as appropriate in order to coordinate the support of the sector.
3. Where required the Agency may carry out supplementing surveys/studies in order to provide a reliable and broad basis of information and data. This could be in particular applicable for proposal concerning Annex II on dedical requirements and for proposal 19 on describing /registering rolling stock and infrastructure competence.
4. Some amendments to Directive 2007/59/EC proposed by proposals 1 to 10 require follow up review and adjustment of related 'non-legislative acts', for example amendments following proposal 4, 8 or 9. The Commission may consider asking the Agency to start preparing respective ERA recommendations already in parallel to activities described in point 1.
5. Based on considerations point 1 to 4, Commission and Agency should discuss and develop in more detail coordination and determination of tasks including draft timeline taking into account resources and work programme of the Agency.



Annex 1: Definitions and abbreviations

Definitions

Table 1: Table of definitions

Definition	Description
Article 35 Working Group	Group of experts established according to article 35 of Directive 2007/59/EC to coordinate the implementation of this Directive in the various Member States

Abbreviations

Table 2: Table of abbreviations

Abbreviation	Definition
TDD	Train drivers Directive
ERA	European Railway Agency
EC	European Commission
NSA	National Safety Authority
MS	Member State



Annex 2: Reference legislation

Table 3: Table of reference legislation

	Title	Reference	Version
1	Directive 2007/59/EC of the European Parliament and of the Council of 23 October 2007 on the certification of train drivers operating locomotives and trains on the railway system in the Community (Train Drivers Directive)	OJ L 315, 3.12.2007, p. 51	
2	Directive 2004/49/EC of the European Parliament and of the Council of 29 April 2004 on safety on the Community's railways and amending Council Directive 95/18/EC on the licensing of railway undertakings and Directive 2001/14/EC on the allocation of railway infrastructure capacity and the levying of charges for the use of railway infrastructure and safety certification (Railway Safety Directive)	OJ L 164, 30.04.2004, p. 44	As last amended by Directive 2009/149/EC (OJ L 313, 28.11.2009, p. 65)



Annex 3: Questionnaire used for evaluation survey 2013

(separate document)

Annex 4: Feedback tables (closed questions, figures and quantities)

(9 tables as follows)



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

2. Recognition Training Centres

MS														
	TRAINING CENTRES	Recognition TC - Applications				Fee - Recognition	Fee Renewal Recognition	Fee up-dating / amending statement of recognition	Other Fees (1)	Other Fees (2)	Other Fees (3)	EC Decision 2011/765/EU implemented (Y/N)	EC Recommendation 2011/766/EU applied (Y/N)	Feedback / comments from sector (Y/N)
		Recognition TC - Provided	Recognition TC - Provided	Recognition TC ex MS - Provided	...from MSS									
		2.1.1	2.1.2	2.1.3	2.1.3.a	2.1.5	2.1.6	2.1.7	2.1.8.a	2.1.8.b	2.1.8.c	2.1.9	2.1.10	2.1.11
1	AT	5	5	0		6 €	6 €	6 €				y	n	n
2	BE	6	4	0		2 705 €	2 705 €	2 705 €	2 164 €			n	n	n
3	BG	4	4	0		0 €	0 €	0 €				y	n	n
4	CZ	6	5	0		120 €	120 €					y	y	n
5	DE	50	50	0		850 €	850 €					n	y	-
6	DK	1	0	0		0 €	0 €	0 €				y	y	y
7	EE	0	0	0		0 €	0 €	0 €				y	y	y
8	EL	0	0	0		150€-600€	100 €		1 000 €			y	y	y
9	ES	10	10	0		5 700 €	0 €	0 €				n	n	y
10	FI	5	5	0		150 €	150 €	150 €				y	y	n
11	FR	24	23	0		4 300 €	1 400 €	1 000 €				y	y	y
12	HU	26	26	0		2 047 €	410 €	410 €				y	n	n
13	IE													
14	IT	4	3	1		5 000 €	2 500 €	2 500 €	14 €			y	n	y
15	LT	1	1	0		49 €	6 €	6 €				y	y	n
16	LU	0	0	0								n	n	n
17	LV	2	2	0		0 €	0 €	0 €				y	y	n
18	NL	5	2	0		4 500 €	4 500 €		137 €			y	y	n
19	PL	19	16	0		200 €	0 €		2 000 €			n	n	n
20	PT													
21	RO	0	0	0								n	n	n
22	SE	34	23	0		3 778 €	0 €	0 €	2 260 €			y	n	y
23	SI	2	2	0		23 €	23 €	23 €				n	n	n
24	SK	2	2	0		200 €	200 €					y	n	n
25	UK	6	2	0		0 €	0 €	0 €				y	n	y
26	x CH													
27	x NO	1	1	0		0 €	0 €	0 €	0 €	0 €	0 €	y	y	n
		213	186	1	0	NSA FI: Recognition fee 'per hour'								



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

3. Recognition Examiners / Examination Centres

MS																							
	Examiners / Examination Centres	Recognition Examiners - Applications	Recognition Examination Centres - Applications	Recognition Examiners - Provided	Recognition Examination Centres - Provided	Recognition Examiners ex MS - Provided	Recognition Examination Centres ex MS - Provided	... from MSs	Fee - Recognition - Examiners	Fee - Recognition - Examination Centres	Fee Renewal Recognition - Examiners	Fee Renewal Recognition - Examination Centres	Fee up-dating / amending recognition - Examiners	Fee up-dating / amending recognition - Examination Centres	Other Fees (1) - Examiners	Other Fees (1) - Examination Centres	Other Fees (2) - Examiners	Other Fees (2) - Examination Centres	Other Fees (3) - Examiners	Other Fees (3) - Examination Centres	EC Decision 2011/765/EU implemented (Y/N)	EC Recommendation 2011/766/EU applied (Y/N)	Feedback / comments from sector (Y/N)
		2.2.1.a	2.2.1.b	2.2.2.a	2.2.2.b	2.2.3.a	2.2.3.b	2.2.3.c	2.2.5.a	2.2.5.b	2.2.6.a	2.2.6.b	2.2.7.a	2.2.7.b	2.2.8.aa	2.2.8.ab	2.2.8.ba	2.2.8.bb	2.2.8.ca	2.2.8.cb	2.2.9	2.2.10	2.2.11
1	AT	9	0	0	0	0	0	6 €		6 €		6 €									y	n	n
2	BE	0	6	0	4	0	0		2 705 €		2 705 €		2 705 €								n	n	n
3	BG	0	0	0	0	0	0														y	n	n
4	CZ	6	0	0	0	0	0	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	n	n	n
5	DE	26	40	26	40	0	0	850 €	850 €	850 €	850 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	n	y	n
6	DK	50	1	50	0	0	0	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	y	y	y
7	EE	0	0	0	0	0	0	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	n	y	n
8	EL	31		29		0		0 €	0 €	0 €	0 €	0 €	0 €								y	n	y
9	ES	0	10	0	10	0	0														n	n	y
10	FI	0	0	0	0	0	0	145 €		145 €		145 €									y	y	n
11	FR	0	1	0	1	0	0		850 €												y	y	y
12	HU	179	1	179	1	0	0	20 €	0 €	0 €	0 €	0 €	0 €								y	n	n
13	IE																						
14	IT	50		30		0		29 €		29 €		29 €									y	n	n
15	LT	25	1	25	1	0	0	53 €	39 €	34 €	17 €	34 €	17 €								y	y	n
16	LU	0	0	0	0	0	0														n	n	n
17	LV	116	0	116	0	0	0	0 €	0 €	0 €	0 €	0 €	0 €								y	y	n
18	NL		1		1																y	y	-
19	PL																				-	-	-
20	PT																						
21	RO	0	0	0	0	0	0														n	n	n
22	SE	1	31	1	20	0	0	1 259 €	3 779 €	0 €	0 €	0 €	0 €	2 125 €	2 260 €						y	n	y
23	SI	0	2	0	2	0	0		23 €		23 €		23 €								n	n	n
24	SK	0	1	0	1	0	0		200 €		200 €		0 €	0 €							y	n	n
25	UK	0	6	0	2	0	0	0 €	0 €	0 €	0 €	0 €	0 €								y	y	y
26	x CH																						
27	x NO		1		1	0	0														y	y	n
		493	102	456	84	0	0																



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

4. Recognition concerning Medical Examination

	MS	Medical Doctors / Medical Centres							Medical Examination											EC Recommendation 2011/766/EU applied correspondingly (Y/N)	Feedback / comments from sector (Y/N)	
		Recognition Med Doc - Applications	Recognition Med Centres - Applications	Recognition Med Doc - Provided	Recognition Med Centres - Provided	Recognition Med Doc ex MS - Provided	Recognition Med Centres ex MS - Provided	...from MSs	Fee - Recognition - Med Doc	Fee - Recognition - Med Centres	Fee Renewal Recognition - Med Doc	Fee Renewal Recognition - Med Centres	Fee up-dating / amending recognition - Med Doc	Fee up-dating / amending recognition - Med Centres	Other Fees (1) - Med Doc	Other Fees (1) - Med Centres	Other Fees (2) - Med Doc	Other Fees (2) - Med Centres	Other Fees (3) - Med Doc			Other Fees (3) - Med Centres
		2.3.1.a	2.3.1.b	2.3.2.a	2.3.2.b	2.3.3.a	2.3.3.b	2.3.3.c	2.3.5.a	2.3.5.b	2.3.6.a	2.3.6.b	2.3.7.a	2.3.7.b	2.3.8.aa	2.3.8.ab	2.3.8.ba	2.3.8.bb	2.3.8.ca	2.3.8.cb	2.3.10	2.3.11
1	AT																					
2	BE	0	1	0	1	0	0			2 705 €		2 705 €		2 705 €							y	n
3	BG	0	0	0	0	0	0														n	n
4	CZ	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	n	n
5	DE	28	20	28	20	1	1	AT	850 €	850 €	850 €	850 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	y	n
6	DK	0	0	1	1	0	0		0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	-	n
7	EE	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	n	n
8	EL	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €								n
9	ES	0	15	0	15	0	0			0 €		0 €		0 €							y	n
10	FI	107	0	102	0	0	0		100 €		100 €		100 €								y	n
11	FR	0	0	77	0	0	0														y	-
12	HU	84	1	84	1	0	0		0 €	0 €	0 €	0 €	0 €	0 €							n	n
13	IE																					
14	IT	-																				
15	LT	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €							y	n
16	LU	5	0	5	0	0	0														y	n
17	LV	-																			-	-
18	NL	0	4	0	4	0	0			1 778 €		1 778 €		1 104 €		1 104 €					-	n
19	PL	0	6	0	4	0	0		0 €	200 €	0 €	0 €	0 €	0 €		2 000 €					-	n
20	PT																					
21	RO	0	0	0	0	0	0														n	n
22	SE	172	0	162	0	0	0		1 300 €	-	0 €	0 €	0 €	0 €							n	y
23	SI	1	6	0	3	0	3		0 €	0 €	0 €	0 €	0 €	0 €							y	y
24	SK	0	14	0	12	0	0		0 €	50 €	0 €	50 €	0 €	0 €							y	n
25	UK	36	0	35	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €							n	y
26	x CH																					
27	x NO	20	0	20	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €							y	n
		453	67	514	61	1	4															



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

5. Recognition concerning Occupational Psychological Examination

MS																							
	Psychologists / Psychol. Centres	Recognition Psychologists - Applications	Recognition Psychol Centres - Applications	Recognition Psychologists - Provided	Recognition Psychol Centres - Provided	Recognition Psychologists ex MS - Provided	Recognition PsycholCentres ex MS - Provided	...from MSs	Fee - Recognition - Psychologists	Fee - Recognition - Psychol Centres	Fee Renewal Recognition - Psychologists	Fee Renewal Recognition - Psychol Centres	Fee up-dating / amending recognition - Psychologists	Fee up-dating / amending recognition - Psychol Centres	Other Fees (1) - Psychologists	Other Fees (1) - Psychol Centres	Other Fees (2) - Psychologists	Other Fees (2) - Psychol Centres	Other Fees (3) - Psychologists	Other Fees (3) - Psychol Centres	EC Recommendation 2011/766/EU applied correspondingly (Y/N)	Feedback / comments from sector (Y/N)	
		2.4.1.a	2.4.1.b	2.4.2.a	2.4.2.b	2.4.3.a	2.4.3.b	2.4.3.c	2.4.5.a	2.4.5.b	2.4.6.a	2.4.6.b	2.4.7.a	2.4.7.b	2.4.8.aa	2.4.8.ab	2.4.8.ba	2.4.8.bb	2.4.8.ca	2.4.8.cb	2.4.10	2.4.11	
1	AT																					n	
2	BE		1		1		0			2 705 €		2 705 €		2 705 €								y	n
3	BG	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €								n	n
4	CZ	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	n	n
5	DE	2	11	2	11	0	2	AT	850 €	850 €	850 €	850 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	y	n
6	DK	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	-	-
7	EE	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	n	n
8	EL	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €									
9	ES	-																				y	n
10	FI	24	0	24	0	0	0		100 €		100 €		100 €									y	n
11	FR	0	0	33	0	0	0		0 €		0 €		0 €									y	-
12	HU	12	1	12	1	0	0		0 €	0 €	0 €	0 €	0 €	0 €								n	n
13	IE																						
14	IT	-																					
15	LT	6	0	6	0	0	0		16 €	0 €	8 €	0 €	8 €	0 €								y	n
16	LU	5	0	5	0	2	0	BE														y	n
17	LV	0	1	0	1	0	0															y	n
18	NL	0	5	0	5	0	0			1 778 €		1 778 €		1 104 €		1 104 €						-	n
19	PL	-																				-	-
20	PT																						
21	RO	0	0	0	0	0	0															n	n
22	SE	25	0	16	0	0	0		2 000 €	0 €	0 €	0 €	0 €	0 €								n	y
23	SI	0	0	0	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €								y	n
24	SK	0	11	0	10	0	0		0 €	50 €	0 €	50 €	0 €	0 €								y	n
25	UK	17	0	17	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €								n	y
26	x CH																						
27	x NO	3	0	3	0	0	0		0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	0 €	y	n



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

6. Accreditation / BASIC Requirements

MS																						
	Accreditation / Basic Requirements	Accreditation preferred ... (Y/N)	... regarding training	...regarding examination professional competence	... regarding medical fitness	... regarding psychol fitness	Accreditation in use (Y/N)	... regarding training	...regarding examination professional competence	... regarding medical fitness	... regarding psychol fitness	Minimum Age	More stringent requirements (Y/N)	Pre-education Art11.1 appropriate? (Y/N)	Annex II requirements appropriate? (Y/N)	Annex II requirements appropriate to insure 'common level'? (Y/N)	Annex II requirements to be revised? (Y/N)	Annex II requirements for psychol examination appropriate? (Y/N)	MS decision: Physical fitness BY recognised med doc (Y/N)	MS decision: Physical fitness UNDER SUPERVISION OF recognised med doc (Y/N)	MS decision: Psychol fitness BY recognised psychologist (Y/N)	MS decision: Psychol fitness UNDER SUPERVISION OF recognised psychologist (Y/N)
		2.5.1	2.5.1.a	2.5.1.b	2.5.1.c	2.5.1.d	2.5.2	2.5.2.a	2.5.2.b	2.5.2.c	2.5.2.d	3.1.1	3.1.2	3.1.3	3.2.1	3.2.2	3.2.3	3.2.4	3.2.5a	3.2.5b	3.2.5c	3.2.5d
1	AT					n					20	n	n	y	y	n	y	y	n	y	n	
2	BE	n				n					18	n	y	y	y	n	y	y	n	y	n	
3	BG	n				n					18	n	y	y	y	n	n	y	n	y	n	
4	CZ	n				n					20	y	y	y	y	y	n	-	-	-	-	
5	DE	n				y	y	y	y	y	20	n	y	y	y	n	n	y	y	y	y	
6	DK	n				n					18	y	n	y	y	y	n	n	y	n	y	
7	EE	n				n					20	y	n	y	y	n	n	-	-	-	-	
8	EL	n				n					22	y	y	n	y	y	y	y	y	n	y	n
9	ES	n				n					18	n	y	y	y	y	n	y	y	y	n	
10	FI	n				n					18	n	y	y	y	n	n	y	n	y	n	
11	FR	n				n					18	y	y	y	n	y	y	y	n	y	n	
12	HU	n				y	y	n	n	n	20	n	y	y	y	n	n	y	y	y	n	
13	IE																					
14	IT	y	y	n	n	n					18	y	n	-	-	-	-	-	-	-	-	
15	LT	n				n					21	n	y	y	y	n	n	y	y	n	n	
16	LU	n				n					18	y	-	-	-	-	-	y	n	y	n	
17	LV	n				n					18	n	y	y	y	n	n	y	n	y	n	
18	NL	n				n					18	n	y	n	n	y	y	n	n	y	n	
19	PL	-				-					20	y	n	n	n	y	n					
20	PT																					
21	RO	n				n					18	n	y	y	y	n	n	y	n	y	n	
22	SE	n				n					20	n	n	n	n	y	y	y	y	y	y	
23	SI	-				-					20	n	y	y	y	n	n	y	n	y	n	
24	SK	n				n					20	y	y	y	y	n	n	y	n	y	n	
25	UK	n				n					20	y	n	n	y	y	n	y	y	n	y	
26	x CH																					
27	x NO	n				-					20	n	y	n	y	y	n	y	y	y	y	



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

7. Annexes IV, V and VI

MS																						
	Annexes IV - VI	Annex IV requirements appropriate? (Y/N)	Annex IV requirements appropriate to insure 'common level'? (Y/N)	ERA Advice on Annex IV: An improvement? (y/n)	ERA Advice on Annex IV: Further amendment required? (y/n)	Training hours dedicated to Annex IV competences	thereoff: railway technology, safety principles, philosophy of operat. rules	thereoff: risks related to operation, means to combat	thereoff: principles guiding opearing modes	thereoff: trains, composition, technical requirements on traction unit	thereoff: Others	Info 4.1.5 is based on 'national provision'	Info 4.1.5 is based on 'experience / exchange with sector'	Info 4.1.5 is based on 'determinations in TC training programs'	Info 4.1.5 is based on 'estimated share of a full driver training program'	Info 4.1.5 is based on '...other sources'	Annex V (RSt) requirements appropriate? (Y/N)	Annex VI (Infrastr) requirements appropriate? (Y/N)	ERA Advice on Annex VI.8 (language level): An improvement? (y/n)	ERA Advice on Annex VI.8 (language level): Further amendment required? (y/n)	Annex VI.8 (language level): Current practice?	Training hours required to achieve minimum language competence
		4.1.1	4.1.2	4.1.3	4.1.4	4.1.5	4.1.5.a	4.1.5.b	4.1.5.c	4.1.5.d	4.1.5.e	4.1.5.I	4.1.5.II	4.1.5.III	4.1.5.IV	4.1.5.V	4.2.1	4.3.1	4.4.1	4.4.2	4.4.3	4.4.4
1	AT	y	y	-	y	32						n	n	y	n	n	y	y				
2	BE	y	y	y	y	72						y	n	n	n	n	y	y	y	-	n	480
3	BG	y	y	y	n	554											y	-	y	n	n	-
4	CZ	y	y	y	n	120	20	40	40	20	0	y	n	n	n	n	y	y	y	n	n	80
5	DE	y	y	y	n	-											y	y	y	n	n	-
6	DK	n	y	y	y	-						-	-	-	-	-	y	y	y	y	n	-
7	EE	y	y	y	y	-											y	y	-	-	n	-
8	EL		n	y	y		320	100	40	80	64	n	n	y	n	n	y	y			y	
9	ES	n	n	y	y	80	20	22	18	20		y	n	n	n	n	y	y	-	n	n	360
10	FI	y	y	y	y	16						y	n	n	n	n	y	y	y	n	n	
11	FR	y	n	y	y	65						n	y	n	n	n	y	y	y	n	n	-
12	HU	y	y	y	n	240						y	n	n	n	n	y	y	-	-	y	-
13	IE																					
14	IT	y	n	y	y	120											y	y	-	-	y	
15	LT	y	y	y	n	640	150	150	150	100	90	y	y	n	n	n	y	y	y	n	n	2 (?)
16	LU	n	n	y	n	312	75	12	70	101	54	n	n	y	n	n	-	-	-	-	-	
17	LV	y	y	-	n	960	120	480	60	300		y	n	n	n	n	y	y	-	n	n	-
18	NL	y	y	y	-	-											y	y	n	y	-	-
19	PL	y	y	y	-	267	44	28	12	92	91	y	n	n	n	n	y	y	-	-	-	-
20	PT																					
21	RO	y	y	y	n	1200	240	150	210	530		y	n	n	y	n	y	y	y	n	n	180
22	SE	n	n	y	n	120						n	n	n	n	y	y	n	y	n	n	-
23	SI	y	y	y	-	24	7	4	6	7		n	n	y	n	n	y	y	y	-	n	-
24	SK	n	n	y	n	32	16	2	2	12		y	n	n	n	n	y	y	y	-	y	720
25	UK	y	y	y	n	480	30	30	180	240		n	y	n	n	n	y	y	y	n	y	-
26	x CH																					
27	x NO	y	n	-	y	216	24	32	68	20	72	n	y	n	n	n	y	y	y	n	-	



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

8. Complementary Certificate / NLR

MS		Complementary certificate and NLR Questions																		
Complementary certificate and NLR Questions		Measures to supervise issuance of certificates in place? (Y/N)	National provisions on how supply info on certificate? (Y/N)	Experiences on cross-border difficulties regarding certificates? (Y/n)	Experiences on misuse, fraud concerning cross-border certificates? (Y/n)	Harmonisation regarding how competences are entered on certificate? (Y/N)	NLR: EC Decision 2010/17/EC appropriate? (Y/N)	NLR: No of submission of 'reasoned requests' - confirmation validity	NLR: No of submission of 'reasoned requests' - suspicion of fraud	NLR: No of submission of 'reasoned requests' - avoid double idduance	NLR: No of submission of 'reasoned requests' - other reasons	NLR: No of 'reasoned requests' received - from NSAs	NLR: No of 'reasoned requests' received - from TD employers	NLR: No of 'reasoned requests' received - TDs regarding own data	NLR: No of 'reasoned requests' received - from NIBs	NLR: No of 'reasoned requests' received - from other stakeholders	NLR: No of 'reasoned requests' received - referring validity	NLR: No of 'reasoned requests' received - referring fraud	NLR: No of 'reasoned requests' received - referring avoiding double issuance	NLR: No of 'reasoned requests' received - referring other reasons
		6.1	6.2	6.3.a	6.3.b	6.3.c	7.1.1	7.2.3.a	7.2.3.b	7.2.3.c	7.2.3.d	7.2.4.a	7.2.4.b	7.2.4.c	7.2.4.d	7.2.4.e	7.2.4.I	7.2.4.II	7.2.4.III	7.2.4.IV
1	AT	y	n	n	n	n	y	0	0	0	0	0	0	0	0	0	0	0	0	0
2	BE	y	n	y	n	n	y	0	0	8	0	0	5	0	0	0	5	0	0	0
3	BG	y	y	n	n	n	y													
4	CZ	y	n	y	n	n	y	0	0	0	0	2	0	20	2	0	22	0	0	0
5	DE	-	-	-	-	-	n	0	0	0	0	0	0	0	0	0	0	0	0	1
6	DK	y	y	n	n	y	y	0	0	0	0	0	0	0	0	0	0	0	0	0
7	EE	y	n	n	n	n	y	0	0	0	0	0	0	0	0	0	0	0	0	0
8	EL	n	n																	
9	ES	n	n	-	-	-	y	0	0	0		0	0	50	2					
10	FI	-	-	-	-	-	y	0	0	0	0	0	0	20	0	0	0	0	0	0
11	FR	y	n	y	n	y	y	0	0	0	1	0	0	0	0	0	4	0	0	0
12	HU	y	n	-	n	y	y	0	0	0		0	0	0	0	0	0	0	0	0
13	IE																			
14	IT	y	y	-	n	n	n	0	0	0		0	0	0	0	0				
15	LT	y	n	n	n	n	y	0	0	0		0	0	0	0	0	0	0	0	0
16	LU	y	n	-	n	y	y	0	0	0		0	0	0	0	0	0	0	0	0
17	LV	y	n	n	n	n	y	-	-	-	-	-	-	-	-	-	-	-	-	-
18	NL	-	y	-	-	-	y	0	0	1	0	0	0	0	0	0				
19	PL	y	n	-	n	y	y	0	0	0	0	0	0	0	0	0	0	0	0	0
20	PT																			
21	RO	n	n	n	n	n	y	0	0	0	0	0	0	0	0	0	0	0	0	0
22	SE	y	n	n	n	n	n	0	0	0	0	0	3	0	0	0	0	0	0	3
23	SI	y	y	n	n	n	y	0	0	0	0	0	0	0	0	0	0	0	0	0
24	SK	y	n	n	n	n	y	0	0	0	0	0	0	0	0	0	0	0	0	0
25	UK	y	n	y	n	y	y	0	0	0	0	0	0	0	0	0	0	0	0	0
26	x CH																			
27	x NO	y	y	n	n	-	y	1	0	0	0	1	2	10	0	0	3	0	0	0
								1	0	9	1	3	10	100	4	0	34	0	0	4



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

8.b Complementary Certificate / NLR

MS		Complementary certificate and NLR Questions						
		CCR: EC Decision 2010/17/EC appropriate? (Y/N)	CCR: No of 'reasoned requests' received - from the NSA	CCR: No of 'reasoned requests' received - from NSAs other MSs	CCR: No of 'reasoned requests' received - TDs regarding own data	CCR: No of 'reasoned requests' received - from NIBs	CCR: No of 'reasoned requests' received - from other stakeholders	Are NLR and CCRs interconnected? (Y/N)
		7.3.1	7.4.3.a	7.4.3.b	7.4.3.c	7.4.3.d	7.4.3.e	7.5.1
1	AT	y	-	-	-	-	-	n
2	BE	-						n
3	BG	y						-
4	CZ	y	-	-	-	-	-	n
5	DE	n	-	-	-	-	-	n
6	DK	y	-	-	-	-	-	n
7	EE	y	0	0	0	0	0	y
8	EL							
9	ES	y	0	0	10	2		y
10	FI	y	-	-	-	-	-	y
11	FR	-						n
12	HU	-						-
13	IE							
14	IT	y						n
15	LT	y	0	0	0	0	0	y
16	LU	-	1	0	0	0	0	n
17	LV	y	-	-	-	-	-	y
18	NL	-						n
19	PL	y						n
20	PT							
21	RO	y	0	0	0	0	0	n
22	SE	-						n
23	SI	y						n
24	SK	y						n
25	UK	y	0	0	0	0	0	n
26	x CH							
27	x NO	-						n
			1	0	10	2	0	



Feedback tables (closed questions, figures and quantities / date of reference: 31.03.2013)

9. Mobility

MS							
	Mobility	Cost of training, Art 24: impact on employment market? (Y/N)	Directive 2007/59/EC: impact on TD mobility between RUs? (Y/N)	Directive 2007/59/EC: impact on TD mobility between MSs? (Y/N)	Work Agencies offering train driver services? (Y/N)	IF Work Agencies offer train driver services - how many Agencies?	IF Work Agencies offer train driver services - how many TDs concerned?
		8.1.3	8.2.1	8.2.2	8.2.3	8.2.3.a	8.2.3.b
1	AT	n	n	n	-	-	-
2	BE	n	y	n	n	-	-
3	BG	n	-	-	-	-	-
4	CZ	n	-	n	y	1	30
5	DE	n	n	n	y	-	-
6	DK	y	n	n	n	-	-
7	EE	n	n	n	n	-	-
8	EL						
9	ES	-	n	n	n	-	-
10	FI	n	n	y	n	-	-
11	FR	n	n	n	n	-	-
12	HU	-	-	-	-	-	-
13	IE						
14	IT	n	y	n	n	-	-
15	LT	n	n	n	n	-	-
16	LU	n	-	-	n	-	-
17	LV	n	n	n	n	-	-
18	NL	-	-	-	-	-	-
19	PL	y	n	n	y	-	-
20	PT						
21	RO	-	n	n	n	0	0
22	SE	-	n	y	y	10	300
23	SI	-	n	n	n	-	-
24	SK	n	n	n	n	-	-
25	UK	n	n	n	n	-	-
26	x CH						
27	x NO	-	n	n	-	-	-