

## POSITION PAPER – 30 September 2022

### Revision of Train Drivers Directive

#### Summary

Train drivers are a key component of the good functioning of the European rail freight market. The ageing of this workforce, with a significant portion set to retire in the coming years, will have an impact on staff shortages of a profession that is still strategically important for Europe's modal shift objectives. It is therefore essential that the Train Drivers Directive is revised so as to ensure train drivers can be utilised as effectively as possible and the profile becomes more attractive as a means of employment.

This should be achieved by ensuring that language requirements do not become a bottleneck to the good functioning of rail freight operations. Better streamlined operations ensure trains can arrive according to schedule and, importantly, train drivers can operate according to a clear and reliable schedule. Crucially, the responsibility of language skills should not be placed solely on train drivers and there should be a requirement for infrastructure managers to make available dispatchers with knowledge of the language of neighbouring Member States.

#### Resilience of train operations

As the outcomes of the Rastatt accident in the summer of 2017 has shown, the resilience of train operations is essential. In the absence of it, the rail freight sector can experience severe financial losses and further challenges that will compromise growth and modal shift targets. The lack of train drivers able to cover diversionary routes significantly contributed to the high level of losses experienced by the sector following the accident.

Over the next decades, the rising investments to upgrade railway infrastructure across the European Union will make even more urgent the need for railway undertakings to have access to sufficient number of train drivers able to easily operate in diversionary routes.

Railway undertakings cannot only rely on voluntary agreements with other railway undertakings, especially incumbent companies, that are often experiencing staff shortages themselves and are not eager to bring support to companies against which they are competing.

The current Directive provides a framework to adapt to extraordinary circumstances but in an extremely rigid and complex way. Consequently, railway undertakings are forced to make considerable efforts and individual change assessments to put in place special measures while they would need much more simplicity as to ensure real resilience of train operations and minimum traffic delays whenever possible.

In this context, it is crucial that the revision of the Directive provides a flexible and user-friendly framework for railway undertakings to implement temporary measures as to ensure that train drivers can easily cover alternatives routes, whilst maintaining a high level of safety and security.

Under targeted operation in “degraded mode”, railway undertakings should be allowed to get temporary approval of train drivers on border area routes with simplified regulations and access requirements. In this specific context, train drivers should be allowed to drive on these routes with temporarily reduced route knowledge and language requirements. The deployment and sharing of train drivers from other railway undertakings should also be simplified.

### Licence and complementary certificates

The EU-wide recognition of national licenses is making a positive contribution to the cross-border mobility of train drivers. Further inclusion of contents in the licenses is currently difficult as most provisions common to the whole sector have already been included. Processes specific to each railway undertakings must remain parts of the complementary certificates.

Further harmonisation of trainings will be possible with the deployment of new digital solutions such as ERTMS, ETCS and DAC but at the condition that these new tools are technically and operationally designed and specified in the same way across the European Union and are widely used, as to avoid unnecessary teachings on devices that will not be deployed before ages.

In addition, the European Commission must consider a uniform licence system for train preparers and train inspectors. The current legal system describes their activities and qualifications only in a minimal way.

## Linguistic requirements

The highly cross-border nature of rail freight in the European Union, where half of the journeys involves crossing a border, makes the issue of language particularly crucial. Even though trains will continue to have extra requirements than road, where operators do not have to master the languages of the countries they crossed – compared to rail where train drivers need to perform regular exchanges with a number of actors while driving – there are nevertheless significant improvements to make to the current situation.

[The European Court of Auditors](#) did rightfully remark that changing drivers at the border point is “costly and cumbersome” and recommended to assess “the possibility of progressively simplifying language requirements for locomotive drivers”.

While never compromising on safety and security, it is clear that the B1 level is too high and constitutes a major barrier to the free movement of train drivers. Moreover, the development of digital and translation tools will offer interesting perspectives for the future that the revised Directive should recognise.

It would also be inappropriate to keep the current status quo in underlining that a B1 level requirement is an absolute necessity while some countries with more than one official EU language are already allowed to permit train drivers with a level A1+ (A1 and railway specific terminology) to operate across borders. Their specific linguistic regime should be preserved as well as those existing at the border sections based on agreements between NSAs in consultation with relevant stakeholders.

Member States should be allowed to lower linguistic requirements for train drivers in international traffic within a certain range of a border crossings with the necessary linguistic support in place by infrastructure managers. The development of tools such as dictionary of pre-defined commands, conversation protocols and digital means of translation allow a significant simplification of the current regime.

This effort must be complemented with new linguistic requirements for infrastructure manager staff working at border crossing points. They should be able to communicate sufficiently in the language of the neighbouring country. This measure will only require minimal training for a small number of staff but will greatly facilitate cross-border traffic.

Finally, over the long term, the Directive should envisage to start work towards establishing English as a standard language for rail freight operations. This long-term goal remains an essential piece to make the Single European Railway Area a reality. It will require cooperation from all actors and a comprehensive implementation plan across all Member States.

### Task allocation and training centres

The European Commission is right to point out that the Directive must take into account how the legislative landscape has evolved since 2007 and the adoption and entry into force of the Fourth Railway Package.

At the moment, significant disparities remain across Member States in the content and quality of trainings with great disparities on the duration of the training. The revised Directive must include clearer guidelines on how national competent authorities must carry out inspections and monitor the certification process. Moreover, the Directive must add more provisions related to the design of training procedures as to ensure a sufficient level of quality and scrap unnecessary teachings.

A provision must be included in the Directive as to guarantee the access of train drivers employed in other Member States to the training centres in another Member States. This access is indeed essential to ensure that train drivers can acquire knowledge of specific routes along which they want to drive in other Member States.