



23 October, 2014

Driving & Vehicle Licensing Agency
D16
DVLA
Longview Road
Swansea, SA6 7JL

Direct Dial: 01494 545706
Email: jay@bvrla.co.uk

Dear Sir or Madam,

Consultation on complying with driving licence directive 2006/126/EC

The BVRLA welcomes the opportunity to comment on Driving & Vehicle Licensing Agency's (DVLA) consultation for complying with driving licence directive 2006/126/EC.

The BVRLA is pleased that DVLA has recognised that Drivers with entitlement to drive both a minibus (category D1) and a goods vehicle with trailer (category C+E or C1+E) are entitled automatically to drive a minibus with a trailer (category D1+E), without the need to take a further test. We agree such practices should be brought in line with EU legislation, in doing so, the aim to standardise legislation across Europe whilst improving driving standards can be achieved.

We therefore support the proposals that those drivers who are currently have this entitlement will retain it and that new drivers will need to take an appropriate test, as relevant.

We suggest that the DVLA send letters to new drivers informing them that they will need to take a test if they wish to drive a minibus with a trailer. We would also suggest that this is placed on the theory test of the driving test.

Driver CPC

A new European regulation which has enabled changes from 2 March 2015 to tachographs exemptions will increase the journey distances from 50km to 100km from the operator's base. We are keen for Driver CPC exemption to be brought in line with the tachographs exemption, increasing from 50km to 100km to harmonise both areas of regulation.

Cost savings

If the exemption remained at 50 kilometres the benefits for our members will be reduced by 50% to £8 million per year as our members would still need to train ½ of the 500,000 drivers in our industry to comply.

If the exemption is increased to 75 kilometres then our original cost savings of around £16 million per year would be achieved. We are calling for Driver CPC to be increased to 100km for the areas

British Vehicle Rental and Leasing Association

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Driving & Vehicle Licensing Agency

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outlined previously and the cost benefits to our members.

We are keen to continue to work with DVLA to ensure that our members, as well as other motorists, all benefit from schemes put in place.

We welcome the opportunity to comment on the DVLA consultation and hope the relationship between DVLA and the Association will continue to add value.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jay Parmar', written in a cursive style.

Jay Parmar

Director of Policy & Membership

Bona-fides BVRLA, the industry and its members

- Established in 1967, the British Vehicle Rental and Leasing Association is the UK trade body for companies engaged in the rental and leasing of cars and commercial vehicles. Its members operate a combined fleet of 3.4 million cars, vans and trucks.
- BVRLA members buy nearly half of all new vehicles sold in the UK, supporting around 184,000 jobs and contributing more than £14bn to the economy each year.
- By consulting with government and maintaining industry standards, the BVRLA helps its members deliver safe, sustainable and affordable road transport to millions of consumers and businesses. For more information, visit www.bvrla.co.uk.