



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT

Directorate C – Land
The Director

Brussels
MOVE.C.2

**IMPLEMENTATION STRATEGY OF DIRECTIVE (EU) 2025/2205 ON DRIVING LICENCES AND
DIRECTIVE (EU) 2025/2206 ON CERTAIN DRIVING DISQUALIFICATIONS**

Legal act	Directive (EU) 2025/2205 of the European Parliament and of the Council of 22 October 2025 on driving licences, amending Regulation (EU) 2018/1724 of the European Parliament and of the Council and Directive (EU) 2022/2561 of the European Parliament and of the Council, and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012 Directive (EU) 2025/2206 of the European Parliament and of the Council of 22 October 2025 amending Directive (EU) 2025/2205 as regards certain driving disqualifications
Type	Directives
Entry into force	25/11/2025
Date(s) of transposition/ application	Directive (EU) 2025/2205 on driving licences: The directive has to be transposed by 26 November 2028 and applied from 26 November 2029, except for Article 9(2)(j) and (k) (to be transposed and applied by 26 November 2027) and Article 17 (to be transposed and applied by 26 November 2028). Directive (EU) 2025/2206 on certain driving disqualifications: The Directive has to be transposed by 26 November 2028 and applied from 26 November 2029.
Lead service / unit	MOVE.C2

Related acts / parallel files	Amended acts Regulation (EU) 2018/1724 establishing a single digital gateway is amended by Article 28, which adds procedures relating to driving licences to its Annex II. Article 5 of Directive (EU) 2022/2561 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers is amended by Article 27, in particular in order to align the rules on the minimum age for driving and holding a Certificate of Professional Competence (CPC) with the new framework on accompanied driving laid down in Article 17(2) of Directive (EU) 2025/2205, and streamline the requirements for young bus drivers to obtain a CPC. Repealed and replaced acts Directive 2006/126/EC is repealed by Article 30(1) with effect from 26 November 2029, with the exception of Article 6(4)(c), which is repealed with effect from 26 November 2027. References to Directive 2006/126/EC shall be construed as references to Directive (EU) 2025/2205, in accordance with the correlation table set out in Annex VII. Commission Regulation (EU) No 383/2012 is repealed by Article 30(2) with effect from 26 November 2029. References to Commission Regulation (EU) No 383/2012 shall be construed as references to Directive (EU) 2025/2205, in accordance with the correlation table set out in Annex VII.
Planned review / update point	This implementation strategy should be formally reviewed in 2030, in light of the first implementation experience, the adoption and application of the relevant implementing acts, and the first feedback from Member States.

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1. EXECUTIVE SUMMARY

The European Union has long prioritised road safety as a cornerstone of its transport and mobility agenda. In line with the EU's Vision Zero strategy, which aims to reduce road deaths and serious injuries to near zero by 2050, ensuring the effective implementation of Directive (EU) 2025/2205 of the European Parliament and of the Council of 22 October 2025 on driving licences (hereinafter 'the DLD') ⁽¹⁾ and Directive (EU) 2025/2206 of the European Parliament and of the Council of 22 October 2025 as regards certain driving disqualifications (hereinafter 'the DDD') ⁽²⁾ is of paramount importance. These directives are an essential part of the road safety package proposed in March 2023 and aimed to address persistent road safety challenges, including administrative burdens associated with outdated systems and legal provisions that needed to be adapted to technological progress, and the urgent need for increased cross-border enforcement.

The DLD constitutes the core of the new legislative framework on driving licences. It is amended by the DDD, which introduces rules on certain driving disqualifications. This approach enhances the coherence of the driving licence framework and reduces duplication, but may also create transposition challenges for Member States, as it requires the integration, within the general driving licence regime, of both the substantive and procedural provisions on driving disqualifications, which contain innovative legal concepts.

The complexity of these challenges is heightened by the introduction of innovative elements and new legal and technical concepts reflecting recent technological developments. These include, for instance, mobile driving licences, reinforced mechanisms for assessing physical and mental fitness to drive, enhanced mutual assistance duties and functions and more detailed rules on normal residence.

Therefore, an implementation strategy is particularly necessary, as the new framework combines long-standing elements of the driving licence acquis with technically complex and legally innovative provisions. The main implementation risks concern digitalisation, interoperability, administrative capacity, cross-border cooperation, fitness-to-drive systems, and the timely adoption of national transposition measures.

⁽¹⁾ Directive (EU) 2025/2205 of the European Parliament and of the Council of 22 October 2025 on driving licences, amending Regulation (EU) 2018/1724 of the European Parliament and of the Council and Directive (EU) 2022/2561 of the European Parliament and of the Council, and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012 (OJ L, 2025/2205, 5.11.2025, ELI: <http://data.europa.eu/eli/dir/2025/2205/oj>). This Directive succeeded Directive 2006/126/EC of the European Parliament and of the Council of 20 December 2006 on driving licences (OJ L 403, 30.12.2006, p. 18) (the "Third Driving Licence Directive").

⁽²⁾ Directive (EU) 2025/2206 of the European Parliament and of the Council of 22 October 2025 amending Directive (EU) 2025/2205 as regards certain driving disqualifications (OJ L, 2025/2206, 5.11.2025, ELI: <http://data.europa.eu/eli/dir/2025/2206/oj>).

The European Commission strives to support Member States through a structured implementation approach based on different guidance documents, technical exchanges, cross-border cooperation projects, implementing acts, templates, bilateral contacts, peer learning and risk-based monitoring. Particular attention will be paid to mobile driving licences, the EU driving licence network (RESPERv3), cross-border driver disqualifications, fitness-to-drive requirements and the interaction with the Single Digital Gateway, eIDAS and novice driver frameworks.

2. ACT OVERVIEW AND SCOPE

2.1. Policy context and objectives

The DLD and DDD address persistent challenges in road safety, cross-border effectiveness of driving licence rules, and administrative inefficiencies in driving licence systems. Their key objectives include:

- Enhancing road safety by ensuring drivers meet updated medical, technical and legal standards, with particular attention to higher-risk groups such as novice and young drivers;
- Facilitating free movement within the EU through a new set of uniform rules facilitating the mutual recognition of driving licences;
- Ensuring cross-border effectiveness of certain driving disqualifications, so that serious road-safety-related offences committed in one Member State can produce consequences across the Union;
- Promoting digitalisation and interoperability through the introduction of mobile driving licences, secure digital verification tools, and the further development of the EU driving licence network;
- Strengthening mutual assistance and administrative cooperation between Member States, particularly for the exchange of information, verification of driving licences' validity and authenticity, and prevention of fraud and multiple licences.
- Reducing administrative burdens and cross-border obstacles while maintaining a high level of safety, including by simplifying procedures and addressing disproportionate barriers such as language-related obstacles in access to driving tests.

2.2. Scope of application

The DLD lays down common rules on EU driving licences. It applies to:

- applicants for and holders of driving licences in the Union, according to the following categorisation: AM, A1, A2, A, B1, B, BE, C1, C1E, C, CE, D1, D1E, D, and DE;
- national authorities responsible for the issuance, renewal, exchange, replacement, suspension, withdrawal, restriction and mutual recognition of driving licences;
- holders of third country driving licences, where the Directive sets out the conditions for their exchange in a Member State.

The Directive does not apply to non-road mobile machinery or to certain vehicles used in agricultural or forestry operations.

The DDD applies to the notification and implementation of certain driving disqualifications committed in a Member State other than the Member State of issuance of the driving licence or the Member State of normal residence of the driver. It does not harmonise national definitions of offences or penalties but rather creates a cooperation mechanism to ensure that serious road-safety-related disqualifications are followed-up across borders.

2.3. Transitional arrangements and key derogations/flexibilities:

The DLD introduces a series of transitional measures, phased implementation dates and flexibilities.

First, as a general rule, and for the most part, Member States must adopt and publish the necessary measures to comply with the DLD by 26 November 2028 and apply them from 26 November 2029. However, certain provisions have to be transposed and applied earlier, namely Article 9(2), points (j) and (k) (driving alternatively fuelled vehicles with a maximum authorised mass up to 4.25 tonnes with a category B or BE licence), from 26 November 2027, and Article 17 (accompanied driving scheme), from 26 November 2028.

The repeal of Directive 2006/126/EC is similarly staged: while the Directive is largely repealed with effect from 26 November 2029, Article 6(4)(c) (equivalence for driving certain alternatively fuelled goods vehicles with a maximum authorised mass up to 4.25 tonnes with a category B) is repealed earlier, from 26 November 2027.

The transition to mobile driving licences is also gradual; they will become the default format 54 months after the adoption of the first implementing act under Article 5(7) (or alternatively earlier, in line with Article 24(3), depending on whether the conditions laid down in the revision clause are met), though Member States may introduce them sooner on a national level, before the mutual recognition principle for those mobile driving licences applies across the EU ⁽³⁾. Meanwhile, physical licences issued or in circulation must comply with the new requirements applicable to those licences by 19 January 2033 ⁽⁴⁾.

The new DDD framework includes specific exemptions and derogations. In the case of cross-border driving disqualifications, the Member State of issuance may not enforce a notified disqualification if mandatory grounds of exception apply and is not obliged to enforce that disqualification if additional optional grounds for exemption apply under national law ⁽⁵⁾.

Additionally, under the DLD, if the Commission adopts an EU-wide extension of the administrative validity of driving licences during a crisis, a Member State may opt out if it is unaffected by the disruption or has already implemented suitable national measures ⁽⁶⁾.

⁽³⁾ Cfr. Article 3(4), (5) and (6) of the DLD.

⁽⁴⁾ Cfr. Article 4(4) of the DLD

⁽⁵⁾ Cfr. Article 15e(1) and (2) of the DLD, as amended by Directive (EU) 2025/2206.

⁽⁶⁾ Cfr. Article 12(4) of the DLD

More broadly, the DLD allows some discretion for Member States when it comes to the implementation of certain provisions, such as:

- the optional introduction of Category B1 ⁽⁷⁾;
- the optional introduction of certain equivalences, to be recognised at national level ⁽⁸⁾; and
- the ability to retain or adopt supplementary national rules in areas such as accompanied driving and novice-driver requirements ⁽⁹⁾.

2.4. Key obligations and deliverables

2.4.1. Unconditional obligations for Member States:

Article 3 - Union standard specifications on driving licences and mutual recognition (and Annex I)

Ensure that national driving licences (regardless of the format) comply with the Directive and Annex I; ensure equivalence between physical and mobile licences; make the mobile licence the default format, from the relevant date; ensure the right of applicants to obtain the driving licence in a physical format or in both formats; and mutually recognise licences.

Article 4 - Physical driving licences (and Annex I)

Issue physical licences in line with Annex I; take all necessary anti-forgery measures; ensure all physical licences comply with the DLD by 19 January 2033; and protect the verification data reported on the licence.

Article 5 - Mobile driving licences (and Annex I)

Issue mobile licences into European Digital Identity Wallets and ensure they are in line with Annex I, Part C; make them retrievable electronically free of charge; limit data processing and retention; and notify the Commission of the list of issuers and keep it updated.

Article 6 - Driving licence categories

Ensure that the driving licences issued are in line with the categorisation set out in the DLD.

Article 7 - Minimum ages

Ensure that the minimum ages of applicants to whom a driving licence can be issued are in line with the rules of the DLD.

⁽⁷⁾ Cfr. Article 6(1)(c)(i) of the DLD.

⁽⁸⁾ Cfr. Article 9(3) to (5) of the DLD.

⁽⁹⁾ Cfr. Articles 17(4) and (6) and 18(4) of the DLD.

Article 8(1), second subparagraph - Practical driving test for applicants with a physical disability

Where a driving licence is issued only for certain types of vehicles or adapted vehicles because of the driver's physical disability, the practical driving test must be taken in such a vehicle. Member States must also adopt the necessary provisions to enable persons with a physical disability to take the test in a suitably adapted vehicle.

Article 9 - Staging and equivalences between categories

Ensure that driving licences of certain categories are issued only to drivers already entitled to drive vehicles in category B; ensure that the driving licences issued provide for the mandatory equivalences set out in the DLD.

Article 10 - Issue, validity and renewal (and Annexes II, V and VI)

Ensure that driving licences are issued and renewed in accordance with the conditions laid down in the Directive; ensure that the validity of the driving licences complies with the rules of the Directive; apply the measures necessary to ensure compliance with the one-holder-one-licence principle.

Article 11 (and Annex III) - Compliance with the minimum standards of physical and mental fitness

Ensure that, for the issuance and renewal of driving licences, applicants undergo a medical examination to ensure minimum standards of physical and mental fitness or provide a medical self-assessment, or establish a system of monitoring of physical and mental fitness to drive, depending on the driving licence category concerned; ensure that applicants or holders undergo a medical examination if problems are detected during the self-assessment or through the monitoring system.

Article 13 - Exchange and replacement of licences issued by Member States

Exchange valid EU driving licences of holders that have taken up normal residence in another Member State, in accordance with the applicable rules of the Directive; return an exchanged physical driving licence to the authorities of the Member State of issuance, and provide the necessary related information; ensure that an exchanged mobile driving licence can no longer be displayed by the holder of the driving licence; apply the procedures of the directive in respect of replacements of driving licences which have been damaged, lost or stolen, or which were fraudulently used.

Article 14 - Attesting the right to drive during exchange or replacement

Ensure that a driving licence under exchange or replacement, if otherwise still valid, can still grant driving rights to its holder, and that the competent authorities of the Member States are able to verify the validity of those driving rights; ensure that such drivers are provided with a document indicating that a request for the replacement or exchange of that holder's driving licence has been made.

Article 15 - Exchange of driving licences issued by third countries

Ensure that, in the cases where the Member State provides for the exchange of third country driving licences, such driving licences are exchanged in accordance with the rules laid down in the Directive.

Article 15a - Duty to notify driving disqualifications ⁽¹⁰⁾

Notify, without undue delay and subject to the conditions laid down in the Directive, the Member State of issuance of the driving licence of certain driving disqualifications committed in its territory, using the standard driving disqualification certificate, and transmitting the relevant decision and, where applicable, the surrendered licence.

Article 15b - Specifications concerning the language of the standard driving disqualification certificate

Transmit standard driving disqualification certificates in any official language of the institutions of the Union that is an official language of the Member State of issuance, or in any other official language of the institutions of the Union that the Member State of issuance has accepted.

Article 15c - Obligation on the Member State of issuance to implement a notified driving disqualification

Ensure that its competent authorities have the power to implement withdrawals, suspensions or restrictions of driving licences notified by other Member States, and, unless a ground for exemption applies, implement them.

Article 15d - Implementation of notified driving disqualifications

Take the measures necessary to implement withdrawals, suspensions or restrictions of driving licences in their territories, in accordance with the nature of the notified measure and with its compatibility with national law; register the measure in its national driving licence register; and act within any applicable national time limits.

Article 15e - Grounds for exemption

Refrain from taking measures to implement driving disqualifications where mandatory grounds for exemption apply; ensure that optional grounds for exemption are applied in accordance with national law; provide any requested information necessary to assess whether an exemption applies without delay.

Article 15f - Exchange of information between Member States on implementation

Inform the Member State of the offence without delay of the measures taken to implement a driving disqualification, or of the application of a ground for exemption; inform the Member State of issuance, without delay, of any relevant later developments.

⁽¹⁰⁾ Articles 15a to 15g were inserted into the DLD by Directive (EU) 2025/2206.

Article 15g - Information to the person concerned and legal remedies

Inform, in accordance with the procedures under its national law and where possible within 20 working days, the person concerned of the notification received; notify that person of the measures taken, the details of those measures, the available legal remedies, and the procedure for recovering the licence or obtaining a new one; ensure that adequate legal remedies are available as regards decisions taken under the Directive, in particular against the non-application of a ground for exemption.

Article 16 - Effects of the cancellation, withdrawal, suspension or restriction of the right to drive of a driver of a power-driven vehicle, of his or her driving licence or of the recognition of the validity of his or her driving licence

Ensure that no driving licences are issued in the case of a cancellation, withdrawal, suspension or restriction of a driving licence in another Member State; ensure that the validity of a driving licence issued by another Member State is not recognised in a Member State where the right to drive of the holder is cancelled, withdrawn, suspended or restricted; ensure that conditions to regain the right to drive are proportionate and non-discriminatory to holders of driving licences issued by any other Member State, and that they do not, by themselves, lead to a refusal of indefinite duration to issue a driving licence or to recognise a driving licence issued by another Member State.

Article 17 - Accompanied driving scheme

Ensure that category B driving licences issued to applicants who have reached the age of 17 years are marked with a specific Union code; ensure that holders of such driving licences who have not reached the age of 18 years drive only when accompanied by a person who is able to provide guidance to them while driving, and who complies with certain conditions.

Article 18 - Probationary period

Impose a probationary period for novice drivers; lay down stricter rules or sanctions, or both, for driving under the influence of alcohol for novice driver that are stricter than those applied to non-novice drivers; and take measures on driving under the influence of drugs and seatbelt/child-restraint compliance.

Article 19 (and Annex IV) – Examiners

Member States must ensure that driving examiners comply with the minimum standards laid down in Annex IV. This concerns not only the formal qualifications required for examiners, but also the conditions under which they perform their functions, including initial and periodic training, quality-assurance requirements, and safeguards.

Article 20 – Normal residence

Member States must apply the rules on normal residence consistently, as these determine which Member State is competent to issue, renew, replace or exchange a driving licence.

Article 21 - Equivalences between non-Union standard driving licences

Article 21 requires Member States to apply the equivalences established by Commission Decision (EU) 2016/1945. Its purpose is to ensure that older driving entitlements, in particular those granted before 19 January 2013, are mapped consistently to the categories set out in Annex I ⁽¹¹⁾.

Article 22 - Mutual assistance and EU driving licence network

Assist other Member States in the implementation of the Directive, in particular by using the EU driving licence network for exchanging information; use the EU driving licence network for administrative and enforcement tasks relating to the verification of driving licences, to facilitate investigations in accordance with Directive (EU) 2015/413⁽¹²⁾, to enforce Directive (EU) 2022/2561⁽¹³⁾; and to carry out all communications under Articles 15a to 15g; ensure that the designated national contact points cooperate with the competent enforcement authorities; ensure that the information exchanged through the EU driving licence network is up-to-date.

Article 23 - Reporting and statistics

Provide the Commission with the reporting and statistical information required by the Directive.

2.4.2. Conditional obligations for Member States:

Article 4(5) - Physical driving licences / microchip (if used)

If a Member State incorporates a microchip in its physical driving licences, apply the technical requirements laid down in Part B of Annex I, and inform the Commission thereof.

Article 4(6) - Physical driving licences / QR code (if introduced)

If a Member State introduces a QR code in its physical driving licences, it must inform the Commission of the measures taken and any later amendments.

Article 6(2) - Driving licence categories / exclusion of specific types of power-driven vehicles (if applied)

If a Member State excludes specific types of power-driven vehicles from the Directive, it must obtain the prior agreement of the Commission. If it excludes types of vehicles used by, or under the control of, the armed forces and civil defence bodies, it must inform the Commission.

⁽¹¹⁾ Commission Decision (EU) 2016/1945 of 14 October 2016 on equivalences between categories of driving licences (OJ L 302, 9.11.2016, p. 62, ELI: <http://data.europa.eu/eli/dec/2016/1945/oj>).

⁽¹²⁾ Directive (EU) 2015/413 of the European Parliament and of the Council of 11 March 2015 facilitating cross-border exchange of information on road-safety-related traffic offences (OJ L 68, 13.3.2015, p. 9, ELI: <http://data.europa.eu/eli/dir/2015/413/oj>).

⁽¹³⁾ Directive (EU) 2022/2561 of the European Parliament and of the Council of 14 December 2022 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers (OJ L 330, 23.12.2022, p. 46, ELI: <http://data.europa.eu/eli/dir/2022/2561/oj>).

Article 7(2)(b) – Minimum ages / lower minimum age for certain category B1 vehicles (if applied)

If a Member State lowers the minimum age for driving certain category B1 vehicles, it must comply with certain minimum conditions and obtain the prior agreement of the Commission.

Article 8(1), first subparagraph – Conditions and restrictions and use of national codes

Where a Member State issues driving licences subject to conditions, it must indicate those conditions using the relevant Union codes set out in Annex I, Part E. Where it uses national codes for conditions not covered by Annex I, Part E, it must inform the Commission in a timely manner and provide details of those codes and the cases in which they are used. Article 9(3), (4) and (5) - Equivalences and territorial authorisations (if granted)

Article 10(4) – National conditions for the issuance of driving licences

If Member States apply to the issuing of driving licences national provisions relating to conditions other than those set out in this Directive, they must inform the Commission thereof.

Article 11(7) - Compliance with the minimum standards of physical and mental fitness (if prepared)

If Member States adopt guidelines for medical practitioners or develop public awareness campaigns to inform citizens about relevant mental or physical health conditions, they must inform the Commission thereof.

Article 12(1), (2) and (4) - Extension of validity in the event of a crisis (if applied)

If a Member State extends the period of administrative validity of a driving licence in a crisis, or decides not to apply a Union-wide extension, it must inform the Commission. If a Union-wide extension is applied, Member States must recognise the validity of driving licences the period of administrative validity of which has been extended.

Article 15b (2) - Language of the standard driving disqualification certificate (optional) ⁽¹⁴⁾

If a Member State wishes to accept certificates in one or more additional official languages of the Union, it may submit a declaration to that effect to the Commission and may subsequently modify or withdraw that declaration.

Article 17 (2), (4) and (6) - Accompanied driving scheme for other categories / additional national conditions (if applied)

If a Member State applies the accompanied driving scheme for categories C1, C1E and/or C, it must comply with the provisions of the Directive for that purpose, and recognise similar licences issued by other Member States; in case they set additional conditions for accompanying persons, or for licences marked with Union code 98.02, they must inform the Commission.

⁽¹⁴⁾) Introduced by Directive (EU) 2025/2206

Article 18(4) - Probationary period / additional national rules for novice drivers (if applied)

If a Member State applies additional national rules for novice drivers, it must inform the Commission.

2.4.3. Transposition and application

Member States must adopt, publish and notify the national measures necessary to transpose the DLD and DDD within the deadlines laid down in those Directives. Their obligations cover both the adaptation of national legal frameworks and the establishment of the administrative, technical and operational arrangements necessary to give full effect to the new Union framework on driving licences and certain driving disqualifications. They must also ensure that the relevant provisions apply from the dates set in those legal acts.

Notwithstanding, it is worth noting that the technical implementation of the provisions covering the (default) issuance and EU-wide mutual recognition of EU standard mobile driving licences are tied to an undefined rolling date (i.e., 54 months from the date of the adoption of the first of the implementing acts laid down by Article 5(7)). The foreseen date is currently predicted to be around Q4 2030; however, by way of a dedicated review clause (Article 24(3)) this date may be anticipated. Extra attention should be paid by all participants to correctly implement these important provisions, which will make the EU one of the first regions introducing this technology in a mutually recognised manner.

2.4.4. Obligations for the Commission:

The DDD and DLD confer several obligations on the Commission that are necessary for the implementation, operation and review of the new Union framework on driving licences and certain driving disqualifications. These obligations concern, in particular, the adoption of implementing and delegated acts, the publication or transmission of information, reporting and review duties, and the examination of national transposition measures. They include obligations to:

Adopt key implementing acts on:

- common operational, interface, and technical rules for the EU driving licence network by **6 June 2026** (Article 22(5)) ⁽¹⁵⁾;
- detailed rules on mobile driving licences, by **26 November 2026** (Article 5(7));
- the format and content of the standard driving disqualification certificate, and the format for related information exchanges, by **26 May 2028** (Article 15a(5));

⁽¹⁵⁾ Although Article 22(5) envisaged the adoption of the Implementing Act by 6 June 2026, the work of the Driving Licence Committee during the first half of 2026 necessarily focused on the preparation of the Implementing Act on mobile driving licences under Article 5(7), given its importance for the implementation of the new digital driving licence framework. Work on the RESPER Implementing Act has nevertheless progressed in parallel through dedicated technical meetings and will continue as a priority during the second half of 2026, with adoption currently envisaged for Q1 2027.

- the interoperability features and the security measures to be complied with by QR codes incorporated in physical driving licences (Article 4(6); no specific deadline);
- the extension of the administrative validity of driving licences in the event of a crisis (Article 12(3); no specific deadline; only in the case of crisis)
- third country driving licences, in order to recognise whether they have a road transport framework in place that wholly or partially guarantees a level of road safety that is comparable to that of the Union, including the categories covered, relevant dates, conditions for verification of authenticity and exchange conditions (Article 15(7); no specific deadline, to be adopted only if justified).

While it has no obligation to do so, the Commission is also **empowered to adopt delegated acts** to amend certain annexes to Directive (EU) 2025/2205, where necessary to take account of technical, operational or scientific developments. These delegated acts may concern, in particular:

- the specifications for physical driving licences (Article 4(8));
- the specifications for mobile driving licences (Article 5(6));
- Union and national codes for conditions, restrictions and specific rights to drive (Article 8(2));
- minimum requirements for theory and practical driving licence tests (Article 10(6));
- minimum standards of fitness for driving power-driven vehicles (Article 10(6));
- minimum standards for driving examiners (Article 19(2)).

Make key information available publicly or to Member States, including:

- the list of mobile driving licence issuers, through a secure channel and in an electronically signed or sealed form (Article 5(5));
- Information on certain national equivalences granted by Member States (Article 9(3));
- share guidelines for medical practitioners adopted by Member States, and information on public-awareness campaigns developed by Member States concerning mental or physical health conditions that may impair fitness to drive, where such guidelines or campaigns are developed (Article 11(7));
- extensions to the period of administrative validity of driving licences granted by Member States in the event of a crisis and opt-outs by Member States in case of EU-wide measures in the event of a crisis (Article 12(2) and (4));
- the third countries that have been recognised as having a road transport framework in place that wholly or partially guarantees a level of road safety that is comparable to that of the Union (Article 15(8));

- information on additional national conditions required by Member States under the accompanied driving scheme (Article 17(4));
- information on additional national conditions required by Member States for licences marked with Union code 98.02 (accompanied driving scheme) (Article 17(6));
- declarations on additional accepted languages for the standard driving disqualification certificate, including through the EU driving licence network (Article 15b(2));
- give users access to information on the languages for which translation or interpretation of theory tests and practical tests is being provided in each Member State (Article 20(4)).

Monitor implementation through reporting and review by:

- assessing, by **26 November 2026, or immediately after the first mobile-licence implementing act**, the feasibility of bringing forward the date from which mobile licences become the default format (Article 24(3));
- presenting, by **26 November 2030 and every five years thereafter**, a report to the European Parliament and the Council on the implementation of Directive (EU) 2025/2205, including an assessment:
 - of the road-safety effects of certain equivalences and of the accompanied driving scheme for professional driving licence categories (Article 24(1));
 - of new technological developments affecting the mass of alternatively fuelled vehicles (Article 24(2));
 - of the possible extension of the cross-border driving disqualification regime to other traffic offences and of possible improvements to the EU driving licence network to reduce administrative burden, optimise notification processes and further facilitate the implementation of driving disqualifications (Article 24(1), point (c), of the DLD, as amended by Directive (EU) 2025/2206)

Promote the exchange of best practices on the integration of third-country professional drivers into the internal market, within the expert group established under Directive (EU) 2022/2561.

In line with recital 62 and Article 25(4) of the DLD, the Commission also intends to formally establish a **dedicated expert group on driving licences and related matters**. The expert group could provide a useful platform to support the implementation of the DLD and to facilitate and promote exchanges at Union level among stakeholders and experts from the Member States on matters relating to driving licences, licensing procedures, the improvement of road safety, and the removal of administrative barriers affecting citizens and businesses.

2.4.5. Obligations / implications for stakeholders:

The Directives primarily impose obligations on Member States. However, following their transposition into national law, several obligations and practical implications will arise for stakeholders involved in driver training, testing, licensing, verification and enforcement. The

precise scope of these obligations will depend on the national measures adopted by Member States, including any additional national conditions or procedures allowed under the Directives.

- **Driving schools** will possibly need to revise their training content and teaching approaches to align with the new requirements on testing knowledge, skills, and behaviour. This includes training and testing elements relating to category B vehicle-and-trailer combinations, motor caravans, alternatively fuelled vehicles, emergency vehicles, eco-driving, protection of vulnerable road users and new vehicle technologies. These obligations follow the general application date of the Directive and will apply from 26 November 2029, following national transposition. However, the specific equivalence rules for certain alternatively fuelled vehicles under Article 9(2)(j) and (k) must be transposed and applied by Member States already from 26 November 2027;
- **Medical authorities** and practitioners should be prepared to apply the revised medical rules in Article 11 and Annex III of DLD, they should exchange and, where appropriate, make use of information developed in their own and other Member States, such as guidelines for medical practitioners, and help develop public awareness campaigns to inform citizens about relevant mental or physical health conditions;
- **Driving examiners** must meet the minimum standards set out in Annex IV, including requirements on competences, qualifications, periodic training, objectivity, impartiality and independence. These requirements will apply from 26 November 2029, following national transposition, and while the core of the previously applicable framework was not touched upon, the rules regarding their independence were strengthened, which may lead to changes in how they operate;
- **Accompanying persons** under the accompanied-driving scheme must meet the eligibility conditions laid down in the Directive and, where applicable, any additional national conditions. For professional goods-vehicle categories, Member States may also require specific training or CPC-related qualifications. The provisions on the accompanied-driving scheme under Article 17 must be transposed and applied by Member States from 26 November 2028;
- **Licence verifiers** other than national authorities, such as vehicle rental companies and insurers, must be able to recognise and accept driving licences in all formats. They must also comply with the Directive's rules on data minimisation and data retention, as transposed by the Member States. In particular, they may process only the data necessary for verification and may retain such data only where this is authorised under Union or national law. These obligations apply from the general application date of 26 November 2029, following national transposition, without prejudice to any Union or national data-protection rules that already apply. For mobile driving licences, the relevant technical implementing rules must be adopted by the Commission by 26 November 2026.
- To support its five-yearly review, the Commission may request information from vehicle manufacturers on the possible impact of new technological developments for alternatively fuelled vehicles on the mass of those vehicles (Article 24(2)). On the other hand, vehicle manufacturers are expected to benefit from the revised B and BE licence rules, as regards the increased weight of alternatively fuelled vehicles that the holders of such licences will be allowed to drive.

2.5. Interaction with other EU and national rules / Dependencies on parallel EU measures

2.5.1. *Interaction with other EU rules:*

- **Directive (EU) 2022/2561 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passengers:** closely connected to the new rules on minimum driving ages, access to the profession of professional driver, and accompanied driving for categories C1, C1E, C. Directive (EU) 2025/2205 also expressly amends Article 5(2) and (3) of Directive (EU) 2022/2561. Finally, authorities can explicitly use the EU driving licence network to enforce Directive (EU) 2022/2561.
- **Regulation (EU) 2018/1724 establishing a single digital gateway to provide access to information, to procedures and to assistance and problem-solving services** ⁽¹⁶⁾: Directive (EU) 2025/2205 amends Annex II to this Regulation, so that procedures for obtaining and renewing driving licences, and for issuing, exchanging and replacing Union driving licences fall within framework of the procedures that are to be offered fully online in accordance with that regulation.
- **Directive (EU) 2015/413 facilitating cross-border exchange of information on road-safety-related traffic offences:** the driving disqualifications framework relies on this Directive's definitions of drink-driving, driving under the influence of drugs, and speeding, for the purpose of identifying "driving disqualification offences". Moreover, authorities can explicitly use the EU driving licence network to facilitate investigations under that Directive.
- **Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems in the field of road transport** ⁽¹⁷⁾: relevant mainly as contextual background, as referenced in the recitals to Directive (EU) 2025/2206, in relation to digital road-traffic information (including speed-limit data).

2.5.2. *Dependencies on parallel EU measures*

- **European Digital Identity Wallet / eIDAS framework:** mobile driving licences must be issued for use with European Digital Identity Wallets (EUDI), in line with Regulation (EU) No 910/2014 ⁽¹⁸⁾. The technical specifications for mobile driving licences are set out in Annex I, Part C to the DLD.

⁽¹⁶⁾ Regulation (EU) 2018/1724 of the European Parliament and of the Council of 2 October 2018 establishing a single digital gateway to provide access to information, to procedures and to assistance and problem-solving services and amending Regulation (EU) No 1024/2012 (OJ L 295, 21.11.2018, p. 1, ELI: <http://data.europa.eu/eli/reg/2018/1724/oj>).

⁽¹⁷⁾ Directive 2010/40/EU of the European Parliament and of the Council of 7 July 2010 on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport Text with EEA relevance (OJ L 207, 6.8.2010, p. 1, ELI: <http://data.europa.eu/eli/dir/2010/40/oj>).

⁽¹⁸⁾ Regulation (EU) No 910/2014 of the European Parliament and of the Council of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC (OJ L 257, 28.8.2014, p. 73, ELI: <http://data.europa.eu/eli/reg/2014/910/oj>).

- **Data-protection framework:** Any processing of personal data for the implementation of the Directives must comply with the data protection framework of the Union, in particular Directive 2002/58/EC ⁽¹⁹⁾, Regulation (EU) 2016/679 ⁽²⁰⁾ and Directive (EU) 2016/680 ⁽²¹⁾.
- **EU rules on police and judicial cooperation in criminal matters:** the driving disqualifications framework established by the DLD (as amended by the DDD) is without prejudice to EU rules on police and judicial cooperation in criminal matters, including the framework decisions and procedural-rights directives expressly cited in recital 7 of the DDD, and on mutual recognition of related judicial decisions.
- **Committee / comitology framework:** several implementing measures will be adopted by the Commission under the rules laid down in Regulation (EU) No 182/2011 ⁽²²⁾, via the Driving Licence Committee established by Council Directive 97/26/EC ⁽²³⁾.

2.5.3. *Interactions with national rules*

The Directive allows for certain national policy choices, for example in relation to the optional B1 category, additional conditions under accompanied driving, crisis-related extensions, and the use of self-assessment and/or monitoring systems for assessing physical and mental fitness to drive.

The driving disqualifications framework established by the DLD (as amended by the DDD) does not harmonise national definitions of offences, their legal classification, or the form of the measure imposed. Member States therefore retain a certain degree of procedural autonomy as regards how the Directive is implemented domestically.

⁽¹⁹⁾ Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (OJ L 201, 31.7.2002, p. 37, ELI: <http://data.europa.eu/eli/dir/2002/58/oj>).

⁽²⁰⁾ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (OJ L 119, 4.5.2016, p. 1, <http://data.europa.eu/eli/reg/2016/679/oj>).

⁽²¹⁾ Directive (EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA (OJ L 119, 4.5.2016, p. 89, <http://data.europa.eu/eli/dir/2016/680/oj>).

⁽²²⁾ Regulation (EU) No 182/2011 of the European Parliament and of the Council of 16 February 2011 laying down the rules and general principles concerning mechanisms for control by Member States of the Commission's exercise of implementing powers (OJ L 55, 28.2.2011, p. 13, ELI: <http://data.europa.eu/eli/reg/2011/182/oj>).

⁽²³⁾ Council Directive 97/26/EC of 2 June 1997 amending Directive 91/439/EEC on driving licences (OJ L 150, 7.6.1997, p. 41, ELI: <http://data.europa.eu/eli/dir/1997/26/oj>).

3. HOW WAS THIS IMPLEMENTATION STRATEGY PREPARED?

The present strategy was prepared in accordance with the framework set out in the Commission Communication “*A simpler and faster Europe: Communication on implementation and simplification*”⁽²⁴⁾.

However, as the Communication was published when negotiations on the DLD and DDD were already at an advanced stage, its framework mainly served to structure the implementation planning after the legislative process. Its principles nevertheless guided the preparation of this strategy.

The preparation of the implementation strategy for the DLD and DDD was therefore informed by the corresponding impact assessment, stakeholder consultations and the discussions held during the ordinary legislative procedure. It takes account of input from Member States during the ordinary legislative procedure, including transport ministries and licensing authorities, as well as from driving schools, road safety stakeholders, the Council and the European Parliament. Taken together, these inputs have helped to ensure that the current implementation strategy is aligned with the final legislative compromises and that it provides a clear, consistent basis for effective and timely transposition and application across the Union.

This implementation strategy is also based on the technical discussions and implementation solutions developed over the past four years in the context of the Driving Licence Committee’s work on the preparation of the DLD and DDD and their future implementation. This basis is now further reinforced, as a more recent development of that same work, by the preparation of the implementing acts provided for in the DLD, in particular those relating to mobile driving licences under Article 5(7), to the EU driving licence network (RESPER) under Article 22(5), and to the standard driving disqualification certificate and related exchange of information under Article 15a(5). This work addresses key aspects of interoperability, security, data updates and interaction with national systems, and therefore fits naturally into the preparatory work of this strategy. At a later stage, this approach will also incorporate the work to be developed under Article 15(7), concerning implementing decisions on the exchange of driving licences issued by third countries.

The strategy therefore also draws on the technical and operational foundations already established for the implementing acts, with a view to ensuring a gradual, coherent and sustainable implementation of the new legal framework. This strategy thus represents a balanced and pragmatic approach, taking into account the diverse needs of Member States while advancing the EU’s broader objectives of road safety, digitalisation, and administrative simplification.

⁽²⁴⁾ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, *A simpler and faster Europe: Communication on implementation and simplification*, COM(2025) 47 final, 11 February 2025, CELEX: 52025DC0047. [EUR-Lex - 52025DC0047 - EN - EUR-Lex](#)

4. IMPLEMENTATION CHALLENGES AND RISK ANALYSIS

This section identifies the main legal, administrative, financial, and practical challenges that may affect timely and correct implementation/application of the DLD and DDD.

4.1. Administrative and governance challenges

Putting the DLD and DDD into practice will bring several administrative and governance challenges, given their wide scope and the need for consistent application across different levels of government. Key changes such as the introduction of mobile driving licences, stronger use of the EU driving licence network (RESPER), revised fitness-to-drive rules, and a new system for cross-border driving disqualifications can require not just legal updates but also significant preparation, coordination, and capacity-building in national administrations. Additional challenges may also arise from the new rules on probationary periods, accompanied-driving schemes, and the attestation of the right to drive during exchange or replacement procedures, all of which call for clear administrative arrangements and effective cooperation between the authorities concerned.

4.1.1. Defining roles and responsibilities

Clear division of tasks will be needed between central, regional, and local authorities, especially where different bodies handle tasks relating to licence issuance, renewals, medical checks, enforcement, data sharing, and driving disqualifications.

In some Member States, there could be overlaps or gaps between transport agencies, driving licences' issuing authorities, police authorities, health authorities and courts that may slow down implementation.

4.1.2. Strengthening administrative and technical capacity

Staff of national administrations, including officials, contact points and enforcement teams will need training to manage, in particular:

- The rollout of mobile driving licences;
- The use of the revamped EU driving licence network (RESPER);
- New cross-border procedures on driving disqualifications;
- The correct identification of the newly introduced driving rights as regards alternatively fuelled vehicles, the accompanied driving scheme, motor homes and category A1 vehicles issued on the basis of a category B driving licence.
- The revision of the rules on normal residence;
- The introduction of the EU-wide probationary period.

4.1.3. *Standardising procedures*

A key implementation challenge will be ensuring adequate procedural standardisation at both EU and national level. At EU level, this will depend on the timely adoption of the common legal and technical rules required by the DLD and DDD, in particular for mobile driving licences (Article 5(7)), the EU driving licence network (Article 22(5)), the standard driving disqualification certificate and related exchange of information (Article 15a(5)) and, where relevant, the implementing decisions concerning certain third countries (Article 15(7)).

At national level, a related challenge will be to ensure that the interpretation and application of the rules of the Directives during administrative and enforcement procedures do not diverge between Member States to such an extent that the mutual recognition and effective cross-border cooperation is jeopardised (e.g. via too restrictive or too favourable application of certain rules, or misinterpretation and consequent different application of newly granted rights or obligations). For this reason, EU-level coordination and non-binding guidance may help avoiding unproportionate frictions.

4.1.4. *Improving coordination between government levels*

In decentralised systems (where e.g. driving licensing procedures, health checks or enforcement are handled regionally), central and local authorities must work closely together. Successful coordination will depend on:

- Clear legal frameworks;
- Strong coordination mechanisms;
- Shared operational guidelines.

Each Member State should be encouraged to establish a national implementation coordination group, bringing together, as relevant, the ministry responsible for transport and road safety, the relevant transport and road safety agencies, driving licence issuing and administration authorities, enforcement authorities, IT/digital identity bodies, health authorities, data protection officers, and judicial/administrative bodies involved in driving disqualifications. The group should be encouraged to prepare a national roadmap and keep track of progress against the identified common milestones.

4.1.5. *Ensuring fair and consistent procedures concerning driving disqualifications*

The new framework introduced by the DDD, specifically concerning the notification and implementation of driving disqualifications, requires a high level of cooperation between the Member State where the offence happened and the Member State that issued the licence. Challenges will include:

- *Notifications, exemptions, and enforcement*

The new framework will function effectively only if notifications are transmitted, received, and processed both promptly and consistently, including through the use of the standard certificate, as well as any related follow-up communication. Particular focus will need to be placed on the application of mandatory and optional grounds for

non-recognition or non-implementation, as well as on the practical enforcement of notified driving disqualifications in cross-border matters.

- *Legal remedies and follow-up information*

It will also be necessary for the new framework to provide clear rules on the legal remedies available to the person concerned, the respective responsibilities of the Member States involved, and the handling of follow-up information exchanges. This includes, above all, cases where more information is needed about the scope, duration, status, or finality of a driving disqualification, or where additional exchanges are required to ensure correct implementation.

4.1.6. Linking with national health systems

Fitness-to-drive checks (including self-assessments and monitoring systems) will require close cooperation between transport and health authorities and professionals, especially as the introduction of the measures laid down in Article 11 and Annex III will constitute a novelty to some Member States. It may therefore be useful to circulate and share best practices on how to organise and make the most out of screening systems.

4.2. Financial and resource challenges

The implementation of the DLD and DDD, particularly on their digital aspects, is foreseen to entail administrative costs, notably in terms of enhancing IT infrastructures and adapting national systems. Financial investments will be needed, in particular, for developing the solutions necessary to introduce mobile driving licences, guarantee interoperability of national systems and ensure appropriate information exchange.

4.3. Administrative Capacity, Coordination and Efficient Implementation

There will also be a need to train personnel responsible for issuing, verifying and controlling driving licences and for managing the related procedures, including those concerning driving disqualifications. The work and resources devoted to implementing the EUDI Wallets, into which mobile driving licences must be issued, should complement and support the implementation of the DLD, rather than duplicate efforts or lead to inconsistencies.

4.4. Proportionate implementation and avoidance of unnecessary gold-plating

In line with the Commission Communication “A simpler and faster Europe: Communication on implementation and simplification”⁽²⁵⁾, and fully respecting the principles of subsidiarity and proportionality, Member States should watch out for the risk of unnecessary gold-plating when transposing and applying this Directive. Particular attention is needed in the areas where the Directive leaves room for national choices, additional conditions or procedural arrangements, so that disproportionate administrative burdens are avoided and the Union’s harmonisation objectives are preserved. This is especially pertinent, inter alia, to medical-fitness requirements and their monitoring systems, the implementation of cross-border

⁽²⁵⁾ COM (2025) 47 final.

driving disqualifications, accompanied-driving and novice-driver schemes, the exchange of licences issued by third countries, and any broader administrative requirements or measures that go beyond what is necessary to ensure compliance with the Union framework.

4.5. Practical implementation challenges

Implementing the new legal framework will require addressing some practical challenges. For example, it will be necessary to avoid disruptions caused by delays in updating systems or processing licences, correctly identify new cross-border rights (e.g. for alternatively fuelled vehicles or motor homes) and enforce new obligations adequately (e.g., the probationary period or the new rules on the notification and implementation of driving disqualifications). Careful planning is of paramount importance, especially in the transition phase to mobile driving licences. This includes developing secure digital platforms and reliable data storage solutions in line with the technical and security standards to be defined by the Commission in the applicable implementing acts, as well as ensuring training for relevant staff, so they can use the new systems effectively. This will help ensure a smooth transition and minimise disruptions.

4.6. Digital implementation challenges

4.6.1. Secure Data Exchange within RESPER

The EU driving licence network (RESPER) plays a crucial role in enabling secure and real-time data exchange between Member States. While the network already existed under the previous legal framework, the DLD and DDD mandate its use for additional tasks; the Commission will also develop a new common set of rules governing the operation of RESPER under an implementing act.

To facilitate seamless integration, national systems must be designed to interoperate within the European Union's driving licence network (RESPER), enabling the efficient and structured electronic exchange of information mandated by the DLD and DDD. Member States should therefore give high priority to ensuring the interoperability and operational readiness of their national systems to connect to RESPER. Establishing clear and efficient procedures for sharing information in a timely and reliable manner is crucial for the implementation of the Directives, and at EU level the upcoming implementing act should be prepared with such considerations in mind.

4.6.2. Introduction of the mobile driving licences

The shift to mobile driving licences requires strong infrastructure at both national and EU levels. While some Member States already possess advanced digital identity systems, others may need upgrades to ensure seamless issuance, verification and management of mobile driving licences. Such Member States will also need to align with the technical and security standards to be developed by the Commission in its implementing act, and with the specifications laid down in Annex I, Part C of the DLD.

It is not only national authorities that may need to evaluate their current IT capabilities and invest where needed in infrastructure that allows them to accept mobile driving licences but the private sector (e.g. car rentals) as well. As the mobile driving licence will have the same legal value as the physical one, it must be ensured that both private and public services are

provided lawfully and efficiently with the presentation of the digital version of the document; otherwise, the implementation of this new format could be unduly set back.

4.6.3. *Protecting Personal and Licence Data*

Mobile driving licences create new cybersecurity and data protection challenges. Personal and licence data must be safeguarded against unauthorised access, breaches and misuse. At the same time, the information exchanged via RESPER must also be protected technically and organisationally. At EU level, the relevant implementing acts should ensure that an adequate level of security is achieved; at the national level, Member States will also need to take the necessary technical and organisational steps to ensure that the new rules do not risk safe and legal handling of personal data.

4.7. Cross-border and international aspects

4.7.1. *Mutual recognition of new rights and verification of the fulfilment of new obligations*

The successful implementation of the DLD will depend, *inter alia*, on the seamless recognition of the rights stemming from driving licences across the Union, regardless of their format, and on the fulfilment (and monitoring and enforcement) of the obligations that come with these rights. Even with interoperable technical frameworks, some measures may still be complex to apply in practice, especially in cross-border situations. Timely exchanges between Member States, and with the Commission through the Driving Licence Committee and its workstreams, are therefore important to clarify questions early, share information in good time and support smooth implementation.

4.7.2. *Cross-border implementation of driving disqualifications*

The DLD introduces a completely new system, under which the Member State of the offence must notify certain driving disqualifications to the Member State of issuance, which must then implement them, unless a ground for exemption applies. This creates an entirely new layer of administrative coordination, which may also make it difficult for citizens to assert their rights and fulfil their obligations in relation to certain driving disqualifications. The timely designation of national contact points for the notification and implementation of a driving disqualification is cardinal for the success of the new system. Those contact points will be central to the effective operation of the new framework, as they will need to ensure timely communication, follow-up and coordination between the authorities concerned.

4.7.3. *Exchange of driving licences issued by third countries*

The DLD creates a more structured framework for the exchange of third country driving licences. This exchange is governed by Article 15 of the DLD, which establishes a structured process for assessing a third country's road transport framework in light of EU road safety standards. Depending on the outcome of this assessment, an implementing act may be adopted, setting out the rules under which the assessed third country's driving licences can be exchanged in Member States, in order for them to be mutually recognised when the holder changes their normal residence within the Union.

As this new way of exchange grants significant additional rights as regards the freedom of movement of holders of licences issued by third countries, and can have significant

implications on road safety, it is important that the criteria for the selection of the first third countries selected for assessment are considered together by both the Member States and the Commission. Well selected third countries can provide valuable experience and feedback for experts and policy makers about the new exchange system, which in turn can be channelled back into the process of selecting further third countries and identifying the criteria for exchanging their driving licences and ensure their mutual recognition.

As such, the Commission intends to hold a pre-consultation with national experts on a cohort of third countries which may, at this stage, be subject to an assessment under Article 15(6). Based on this consultation, an “Indicative Timetable” will be prepared, setting out a non-binding methodology and timeframe for assessing the first cohort of third countries and for adopting an implementing decision on the compatibility of their road transport frameworks with EU road safety standards, if appropriate. The Indicative Timetable is foreseen to be established by the end of 2026, and the first assessment(s) to begin in 2027, so that by 2029, when the Directive becomes applicable, holders of driving licences issued by third countries objectively well suited to be subject to such implementing decisions already start benefitting from simplified procedures for the exchange of their driving licences. Nevertheless, it is important to note that the Indicative Timetable should be looked at merely as a planning tool, not as an obligation on part of the Commission or the Member States.

In the same vein, once the first implementing acts are in force, a parallel timetable will be prepared to provide for the (mandatory) reassessment of the adopted implementing decisions.

4.8. Stakeholder challenges and compliance risks

The implementation of the DLD presents some challenges for stakeholders.

First, driving schools, insurers and rental services will need to adapt their operations to the increased digitalisation introduced by the DLD, which may require adjustments to their business models. These organisations may need to modify training programmes, update their IT infrastructure, and revise contractual arrangements to accommodate mobile licence verification processes.

Secondly, new training will be required to ensure that driving instructors, examiners, insurance and car rental staff, software developers and IT operators involved in mobile driving licence systems are familiarised with updated regulatory requirements and mobile licence verification. Medical practitioners may also need to be supported, in particular in relation to the revised fitness-to-drive framework and any national systems of medical assessment, or monitoring. Similarly, as the new rights and obligations provided by the Directives are quite complex in their date and scope of application, clear communication will be essential for gaining stakeholder acceptance and compliance.

4.9. Complexity of the identified challenges

For the purposes of this assessment, the provisions of the Directive have been classified into three categories of complexity, reflecting the nature of the measures concerned and the degree of implementation effort they are likely to require.

The new framework set out by the Directives contains a combination of pre-existing provisions, relatively unchanged provisions, substantially revised provisions and entirely new obligations. Member States will need to distinguish between provisions that can already be considered

transposed under pre-existing measures, provisions that can be transposed through minor adjustments to existing legislation, and provisions requiring new legal, administrative or technical arrangements.

4.9.1. *Categorisation of the complexity of the measures:*

a) Category I – New or Significantly amended High Complexity Measures, requiring implementation guidance

This category covers high-complexity, high-risk provisions that either introduce genuinely new rules or, even where the rules build on previously existing frameworks, introduce significant changes, requiring substantial EU-level coordination, implementational support and/or technical implementing acts before they can be applied in practice.

Annex I to this Implementation Strategy contains a description of the provisions of the Directive that are considered to fall under Category I.

Such measures may require new infrastructure, cross-sector coordination (for example, between transport, digital, and health authorities or professionals) and careful legal interpretation.

For these rules, the Commission intends to provide support in the form of issuing guidance documents, creating information tables and roadmaps, convening expert meetings (including with external stakeholders), bilateral meetings and promoting model protocols (for example, by circulating examples of best practices among Member States). The aiding and facilitatory measures that are planned for these provisions of the Directive are better described in Annex I. Without this support, Member States could implement the measures in divergent or incorrect ways, which could undermine mutual recognition and the Directive's objectives and/or lead to infringement procedures, which could have been avoided.

b) Category II – New but straightforward measures, or only Slightly Revised Measures, where focus should be placed on cross-border implementation

This category covers provisions that are new, but clear and low risk in terms of national interpretation and transposition. Most of the problems that are foreseen in the implementation of these provisions are reserved to the cross-border context.

Annex I to this Implementation Strategy contains a description of the provisions of the Directive that are considered to fall under Category II.

These measures are generally consistent with many existing national approaches and are unlikely to raise significant issues. Most Member States should be able to implement them without major systemic changes in the national context. They should therefore not require specific implementation support to be correctly operationalised at national level.

However, as these measures are a novelty when it comes to their EU-wide scope, their cross-border application should be aided, where needed. As a result, the Commission should support the implementation of these measures but remain limited in that support to practical tools focused on their cross-border application. These should include FAQs and Q&As, clarifications during the Driving Licence committee, development of interpretative or guidance documents, and bilateral meetings as needed. The aiding and facilitatory measures that are planned for these provisions are better described in Annex I.

c) Category III – Pre-existing Measures and administrative formalities

Category III covers provisions that remain unchanged or have been revised only marginally in relation to the previous directive.

Since these provisions largely remain as they were before the revision, Member States most likely will not have to re-transpose them or significantly amend the pre-existing national transposition measures. This preserves legal continuity, reduces administrative burden, and ensures that significant parts of the framework remain in place, while changes are introduced only where necessary.

This typology is particularly relevant in the context of the DLD where a non-insignificant part of the *acquis* is carried over or adjusted incrementally ⁽²⁶⁾, while only certain provisions create genuinely new implementation challenges.

The Commission only intends to provide guidance as regards these rules upon explicit requests. The Commission also intends to initiate and aid Member States in initiating corrigendum procedures or provide other administrative help, where needed.

4.10. List of measures

Annex I to this Implementation Strategy contains in detail the aiding and facilitatory measures that are planned for each provision of the Directive, but below a brief summary is available.

1. Category I – list of measures ⁽²⁷⁾

Key measures include, inter alia:

- a. **Digital driving licences** - the introduction of mobile driving licences as a new Union format, to become the default from the date set in the Directive, supported by the technical framework required for issuance, interoperability, updates, security, and verification (see in particular: Articles 3(4), 5(1) and (7), Annex I, Part C).
- b. **Enhanced fitness-to-drive assessments** - a strengthened approach to assessing physical and mental fitness to drive, combining the minimum standards in Annex III with medical examinations, self-assessment forms, and (for certain categories) national monitoring systems (see in particular: Article 11; Annex III).
- c. **New categorisation, in particular for B and B1, and staging and equivalence rules** - revised provisions on heavy quadricycles, mass and weight thresholds, motor caravans, emergency vehicles, and certain alternatively fuelled vehicles, including associated training/testing requirements and Union codes (see in particular: Articles 6(1)(c)(i) and(ii), 9(2)(i) and (j), 9(4)(c) and (d), Annex I, Part E, Annex V). It will also be examined whether implementation guidance is needed on other categories or equivalence.

⁽²⁶⁾ The DLD is the fourth successive EU Driving Licence Directive, building on more than 40 years of EU *acquis* in this field, which started with the first Directive adopted in 1980 (First Council Directive of 4 December 1980 on the introduction of a Community driving licence (80/1263/EEC), OJ L 375, 31.12.1980).

⁽²⁷⁾ For the definition, see point 4.9.1 a)

- d. **Mutual assistance and cross-border implementation of driving disqualifications** - reinforced use of the EU driving licence network for licence-related cooperation, alongside new rules on notification, implementation, exemptions, information exchange, and remedies for cross-border driving disqualifications (see in particular: Article 22 of Directive (EU) 2025/2205; Articles 15a–15g and Article 22(3a), as inserted by Directive (EU) 2025/2206). It should be treated together as RESPER is a cornerstone of the DDD, which also received stronger road safety enforcement uses.
- e. **Annex II requirements on tests, knowledge, skills, and behaviour** - updated common minimum requirements for theory and practical tests, including content relating to vulnerable road users, eco-driving, electric vehicles, and advanced driver-assistance/automated driving systems (see in particular: Article 10; Annex II).
- f. **Normal residence and related derogations** - Article 20 retains normal residence as the default rule for licensing, but the definition was slightly adjusted and now it adds targeted exceptions: renewal/replacement in the Member State of issuance, and first issuance of category B licences in the Member State of citizenship in certain language-barrier cases. This increases the operational complexity of the residence-based system (see in particular: Article 20(1)-(4)). Further the implementation of normal residence rules poses challenges continuously and this opportunity should be seized to improve their implementation.

2. Category II - list of measures ⁽²⁸⁾

Key measures include, inter alia:

- a. **Two-year probationary period for novice drivers** - the Directive introduces a mandatory probationary period of at least two years for novice drivers. This is coupled with stricter alcohol rules or sanctions, and measures to reduce drug-driving and non-compliance with seatbelt and child-restraint requirements (see in particular: Article 18(1) - (6); Annex I, Part E, code 98.01). Many Member States already have such rules, which therefore may only need to be adjusted in the national context, however, their EU-level application is a novelty, and its proper implementation should be aided.
- b. **Accompanied driving from age 17** - the Directive sets a Union framework for accompanied driving, in particular for category B from age 17. It also allows Member States, under defined conditions and using the relevant Union code, to extend the scheme to category C (see in particular: Article 17; Article 7(2)(d); Annex I, Part E, code 98.02). Many Member States already have such rules, which therefore may only need to be adjusted in the national context, however, their EU-level application is a novelty and its proper implementation should be aided.
- c. **Validity periods** - the Directive standardises administrative validity at 15 years for categories AM, A1, A2, A, B1, B and BE (from 10 years before; 10 years now only allowed in specific cases), and 5 years for categories C, CE, C1, C1E, D, DE, D1 and D1E, and slightly revises the system of specified flexibilities and introduces crisis-related extensions (see in particular: Article 10(2)–(5); Article 12) as some of these

⁽²⁸⁾ For the definition, see point 4.9.1 b)

flexibilities are new their application should be explored, in particular in the cross-border context.

- d. **Exchange of third-country licences** - the Directive introduces a more structured approach to exchanging third-country driving licences, including a Commission-based mechanism to identify eligible third countries and set exchange conditions, while retaining a residual national route for countries not covered by an implementing act (see in particular: Article 15(1)– (10)).
- e. **Physical licence microchip / QR code verification** – as per Article 4(5)-(7) and Annex I Parts B to D now provide for the possibility of interoperability of not only microchips but QR codes as well, the current practices as regards both should be assessed to help identify risks and shortcomings. Especially as, pursuant to Article 4(6), the Commission is required to adopt implementing acts concerning the interoperability features and security measures applicable to QR codes incorporated in physical driving licences, having an accurate understanding of the state of play will be essential for the preparation of those acts. In addition, Article 4(8) empowers -if needed -the Commission to adopt delegated acts, where necessary, to amend Annex I, Parts A1 and A2, B to B4 and D in order to take account of technical, operational or scientific developments.
- f. **Minimum ages and alignment with the CPC Directive** - the Directive aligns minimum ages across licence categories and certain professional-driving access rules with Directive (EU) 2022/2561. This includes rules for categories C, CE, D and DE, and accompanied driving for certain goods-vehicle categories (see in particular: Article 7; Article 17(4); Article 27 amending Directive (EU) 2022/2561). The cross-border effects of these changes should be assessed.
- g. **Attesting the right to drive during exchange or replacement** – While the overall system for exchanging and replacing driving licences remains unchanged this new obligation, and its implementation should be aided (see in particular: Article 14).
- h. **Transposition** - Member States must transpose the two Directives by **26 November 2028**, with application from **26 November 2029**. The framework also provides for earlier dates for certain provisions and implementing measures (see in particular: Article 29 of Directive (EU) 2025/2205; Article 2 of Directive (EU) 2025/2206). Given the different deadlines concerned, targeted guidance will be provided to help Member States identify the applicable transposition and application dates.

3. Category III – list of Measures ⁽²⁹⁾

Key measures include, inter alia:

- a. **Union-standard physical licence** - the DLD retains the concept of a harmonised Union model for physical driving licences. While the technical specifications and safeguards are more detailed, the underlying approach continues the model previously set out in Directive 2006/126/EC (now reflected in Articles 3 and 4 of the DLD and Annex I, Parts A1 and A2 in particular).
- b. **Mutual recognition** - the long-standing rule that driving licences issued by Member States are recognised across the Union is preserved. The updated provision in Article 3(6) of Directive (EU) 2025/2205 maintains the same principle, now operating alongside the introduction of the digital format.
- c. **Vehicle categories (overall structure)** – notwithstanding what is mentioned above, the core architecture of licence categories (AM, A1, A2, A, B, BE, C1, C1E, C, CE, D1, D1E, D, DE) remains essentially unchanged.
- d. **Conditions/restrictions and licence codes** - the requirement to indicate conditions or restrictions attached to the right to drive remains. Article 8 and Annex I, Part E modernise and systematise the coding system, but the function is still to ensure that restrictions and authorisations are transparent and enforceable.
- e. **Issue, validity and renewal** – In case a subtopic within Article 10 (or relating provisions) makes it necessary aid will be provided under a dedicated point within category I or II, however, the overall rules as regards these topics have not changed significantly enough to warrant dedicated deliberations, unless specifically requested.
- f. **Extension of validity in crises** - Article 12 introduces an emergency mechanism allowing Member States (or, where a crisis affects at least two Member States, the Commission) to extend temporarily the administrative validity of driving licences, subject to notification, publication, and mutual-recognition conditions (Article 12).
- g. **Minimum standards for driving examiners** - the requirement for common minimum standards for examiners is maintained. Article 19 and Annex IV update the content (for example, training and independence), but the basic obligation remains consistent with the earlier regime.
- h. **Exchange and replacement of Member State licences** - the administrative framework for the exchange, replacement, return of licences already in circulation, and related safeguards is broadly carried forward, now reflected in Article 13 of Directive (EU) 2025/2205.
- i. **Reporting by Member States** - the Directive requires regular reporting to the Commission on the number of licences issued, renewed, replaced, withdrawn, and exchanged, and – under the disqualifications framework – on notifications, exemptions,

⁽²⁹⁾ For the definition, see point 4.9.1 c)

and the functioning of the cross-border disqualification regime (Article 23 of Directive (EU) 2025/2205; Article 23(2a) as inserted by Directive (EU) 2025/2206).

- j. Annexes IV and VI** – any updates are clear and primarily relevant to national implementation capacity (see in particular: Article 19, Annex IV; Annex VI).
- k. Definitions** - a number of familiar concepts remain, despite the fact that the definitions framework is expanded and modernised to accommodate digital licences and newer vehicle types.
- l. Corrigenda and other administrative aid** –all mistakes (e.g. bad reference, linguistic errors) which are caught during the transposition are collected, should the Member States wish to share them and periodically sent to the Council and the European Parliament to see whether it is possible to remedy them through a corrigendum procedure. Other than the corrigendum in case the administrative work in relation to the transposition and implementation needs facilitation in any other way it is also categorised here.

5. GOVERNANCE AND COORDINATION

5.1. Commission internal governance

The implementation of the DLD and DDD is coordinated by MOVE.C.2 (Road Safety Unit) as the lead unit, with CNECT.H.4 (Digital Identity and Trust) and the relevant services of DIGIT providing dedicated support on all the digital aspects, and MOVE.A.4 (Legal Issues & Enforcement Unit) on all legal aspects. As regards the implementation of the DDD, MOVE.C.2 also intends to consult JUST.A.5 (Criminal Procedural Law) to help ensure proper implementation and to advise on the organisational aspects, based on their vast experience implementing their own legislation dealing with enforcement. The Legal Service will be consulted, as necessary, to ensure full compliance with applicable EU legislation and the EU acquis. The Secretariat-General will provide strategic coordination across Commission services when required.

Key internal decision points will be managed through internal DG MOVE coordination, with the lead unit maintaining overall responsibility for policy coherence and implementation oversight. This organisational structure ensures comprehensive coverage of both technical and legal dimensions, while maintaining coherence and effective coordination across Commission services.

5.2. Member State counterparts and coordination channels

The Driving Licence Committee constitutes the main coordination channel for this strategy. The Commission has steered the implementation preparations for the DLD and DDD through this Committee, established under Council Directive 97/26/EC. The Committee serves as the primary forum for coordination on the preparation and adoption of the key implementing acts provided for in the Directive.

In addition to the Committee, and in line with recital 62 and Article 25(4) of the DLD, the Commission intends to establish an expert group on driving licences and related matters, in order to be able to call, whenever necessary, on a relevant range of expertise for the exercise of its empowerment to adopt delegated acts, and also to facilitate and encourage exchange at

Union level between stakeholders and experts of Member States on all matters related to driving licences, licensing procedures, improving road safety and removing administrative barriers which constrain citizens or enterprises.

Finally, as regards questions that require specialised expertise (IT, health, etc.), the use of dedicated workstreams or working groups or ad-hoc conferences may also be envisaged. Bilateral consultations between the Commission and the Member States are foreseen as a tool facilitating implementation, both in a specialised and in a general manner, and depending on the individual needs of Member States.

5.3. Current Status of Implementation

An initial presentation of the main lines of the implementation strategy was delivered to the Committee on Driving Licences at its meeting of 12–13 June 2025, providing a solid foundation for the ongoing work. Negotiations on the implementing acts concerning RESPER (under Article 22(5)) and mobile driving licences (under Article 5(7)) are ongoing in two dedicated workstreams of the Committee, where Member State could (and were advised to) nominate additional (specialised) experts. Both implementing acts advance well, with the one on mobile driving licences nearing final approval by the committee.

The Commission regularly submits to Member States the draft implementing acts along with:

- Non-paper documents outlining key technical specifications;
- Detailed Q&A guidance to clarify intentions, meanings and understandings;
- Other supporting materials to facilitate smooth adoption by Member States.

These accompanying documents explicitly aim to provide comprehensive explanations of the new requirements, address potential implementation challenges, and offer practical guidance for national authorities.

The European Commission has also actively promoted and held bilateral meetings and exchanges with Member States to facilitate the effective implementation of the DLD and DDD. These discussions have focused on addressing practical challenges, aligning national transposition efforts, and ensuring compliance with the Directives' requirements. By engaging directly with Member States, the Commission aims to identify and resolve implementation gaps, foster consensual solutions, and accelerate the adoption of national measures. These bilateral exchanges will complement broader coordination efforts, ensuring a cohesive and timely rollout of the Directives across the EU.

Finally, as regards the transposition Article (Article 29), the services of MOVE.C.2 have provided Member States with their interpretative guidance, to ensure that the differentiation in the transposition and application deadlines is uniformly well understood. This interpretative guidance is attached as Annex II to this Implementation Strategy.

5.4. Delegated and implementing acts planning

Type	Subject Matter	Responsible Commission Service	Indicative Timetable	Consultation Needs
Implementing Act	Mobile driving licences: visual appearance, interoperability, testing, data and record updating standards, security, personal data protection, exchange standards, trusted issuer lists, verification features, and interface with national systems (Article 5(7))	Unit MOVE.C.2 (Road Safety)	Q3 2026	Driving Licence Committee (examination procedure)
Implementing Act	EU driving licence network: common operational, interface and technical requirements (Article 22(5))	Unit MOVE.C.2 (Road Safety)	Q4 2026	Driving Licence Committee (examination procedure)
Implementing Act	Third country driving licences: recognition of comparable road safety frameworks, verification and exchange conditions (Article 15(7))	Unit MOVE.C.2 (Road Safety)	First assessment(s) to begin in 2027, first decisions by 2029	Driving Licence Committee (examination procedure)
Implementing Act	QR codes in physical driving licences: interoperability features and security measures (Article 4(6))	Unit MOVE.C.2 (Road Safety)	Q3 2027	Driving Licence Committee (examination procedure)
Implementing Act	Extension of administrative validity of driving licences in crisis situations (Article 12(3))	Unit MOVE.C.2 (Road Safety)	In case of crisis	Driving Licence Committee (urgency procedure)
Implementing Act	Format and content of the standard driving disqualification certificate; format for the information to be provided when implementing a driving disqualification (Article 15a (5))	Unit MOVE.C.2 (Road Safety)	Q4 2026/Q12025	Driving Licence Committee (examination procedure)
Delegated Act	Physical driving licence specifications (amending Annex I, Parts A1, A2, B to B4 and D) (Article 4(8))	Unit MOVE.C.2 (Road Safety)	In case of need	Expert group consultation
Delegated Act	Mobile driving licence specifications (amending Annex I, Part C) (Article 5(6))	Unit MOVE.C.2 (Road Safety)	In case of need.	Expert group consultation
Delegated Act	Applicable national and Union codes for conditions/restrictions (amending Annex I, Part E) (Article 8(2))	Unit MOVE.C.2 (Road Safety)	One delegated act foreseen in 2027	Expert group consultation
Delegated Act	Minimum requirements for issuance, validity and renewal of driving licences (amending Annexes II, III, V and VI) (Article 10(6))	Unit MOVE.C.2 (Road Safety)	In case of need. One delegated act may be foreseen in line with recital 35 of the DLD, subject to the studies referenced there	Expert group consultation
Delegated Act	Minimum standards for driving examiners (amending Annex IV) (Article 19(2))	Unit MOVE.C.2 (Road Safety)	In case of need.	Expert group consultation

6. PLANNED KEY MILESTONES TIMELINE AND PROGRESS TRACKING

Quarter	Key milestones	Outputs	Notes
2026 Q3	Adoption of the Implementation Strategy	The Implementation Strategy is adopted and published.	
	Adoption of the implementing act on mobile driving licences	Adoption of the implementing act that fulfils the obligation under Article 5(7) of DLD.	The adoption triggers the review clause under Article 24(3).
2026 Q4	Adoption of the RESPER implementing Act	Adoption of the implementing act that fulfils the obligations under Article 22(5) and 15a (5) of DLD.	
	First quarterly experience sharing meeting of the Driving Licence Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions found.	
	Finalisation of the Indicative Timetable as regards third country licences	The Indicative Timetable for the implementation of Article 15(6)-(9) of DLD, as regards a first group of selected third countries, is finalised.	
	Establishment of the Expert Group on driving licences and related matters	Establishment of the new Expert Group to give a platform for the involvement of all stakeholders for the implementation and application of the DLD and DDD.	The establishment of the Expert Group will also enable the exercise of the empowerments as regards delegated acts, should they become necessary.
	Commission assessment of whether mobile driving licences can become the default format earlier than currently foreseen	Report on the feasibility of bringing forward the application date laid down in Article 3(4), pursuant to Article 24(3)	The assessment must be completed by 26 November 2026, or immediately after the adoption of the first implementing act establishing the technical framework for mobile driving licences under Article 5(7), whichever is earlier.
2027 Q1	Beginning of the development of the measures aiding the implementation of High Complexity provisions	Execution of the Implementing Strategy begins with the actions foreseen as regards the high-complexity measures (see Annex I).	
	Second quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions found.	

Quarter	Key milestones	Outputs	Notes
2027 Q2	Continued focus on the development of the measures aiding the implementation of the High Complexity provisions	Execution of the Implementing Strategy continues with the actions foreseen as regards the high-complexity measures (see Annex I).	
	Third quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions found.	
	Beginning of the assessment of the first third country(ies) to be covered by simplified exchange procedures	Execution of the Indicative Timetable begins, as per Article 15(6) of the DLD. The first step is an assessment, in cooperation with the Member States, of the third countries that may be first covered by an implementing act under Article 15(7), lasting 6-18 months.	
2027 Q3	Continued focus on the development of the measures aiding the implementation of the High Complexity provisions	Execution of the Implementing Strategy continues with the actions foreseen as regards the high-complexity measures (see Annex I).	
	Fourth quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions found.	
2027 Q4	Conclusion of the last set of measures aiding the implementation of High Complexity provisions; Beginning of the development of the measures aiding the implementation of Mid Complexity provisions	Execution of the Implementing Strategy as regards the high-complexity measures concludes; beginning of the actions foreseen as regards Mid-complexity provisions (see Annex I).	
	Fifth quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions found.	
	Conclusion of the assessment of first third country(ies); Preparation of the implementing act(s)	The first assessment(s) under Article 15(6) is concluded, the drafting of the Implementing Act begins.	As the time allotted for assessment is at least 6 months, this should be viewed as the very end of Q4 or maybe even shift to 2028 Q1.
	First provisions have to be transposed and become applicable (Article 9(2), points (j) and (k))	Applicability of the Directive partially begins.	These provisions are identified as High complexity, so their respective guidance and aid must be concluded in 2027.

Quarter	Key milestones	Outputs	Notes
2028 Q1	Sixth quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions.	
	Continued focus on the development of the measures aiding the implementation of the Mid Complexity provisions	Execution of the Implementing Strategy continues with the actions foreseen as regards the mid-complexity measures (see Annex I).	
2028 Q2	Continued focus on the development of the measures aiding the implementation of the Mid Complexity provisions	Execution of the Implementing Strategy continues with the actions foreseen as regards the mid-complexity measures (see Annex I).	
	Seventh quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions found.	
2028 Q2	Completion of the completeness check for the transposition of Article 9(2), points (j) and (k)	Verification that all Member States have communicated the national measures necessary to transpose Article 9(2), points (j) and (k).	The completeness check should be completed by 26 May 2028, six months after the transposition deadline of 26 November 2027. Where a Member State communicates its measures late, the check should be completed within six months of that communication.
2028 Q3	Conclusion of the last set of measures aiding the implementation of Mid Complexity provisions	Execution of the Implementing Strategy concludes as regards the mid-complexity measures (see Annex I)	From this point on, guidance and aid are provided in case of request only.
	Eighth quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions found.	
	Adoption of the first third country(eis) implementing act(s) and establishment of a continued work routine for the identification of new third country(ies) that may be subject to such acts.	Adoption of the first Implementing Decisions in line with Article 15(7); beginning of continued discussions with Member States on the possible adoption of new implementing acts.	
2028 Q4	Ninth quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table to give accounts of the measures already taken for implementation of the DLD and DDD, problems encountered or expected, and resolutions found.	

Quarter	Key milestones	Outputs	Notes
	Transposition deadline and application of Article 17	Member States transpose the remaining provisions of the Directive and begin applying Article 17.	Implementation difficulties specific to Article 17 are expected to have been addressed during 2027–2028 through the measures planned for the mid-complexity provisions. RESPER will also be adapted, where necessary, to support the implementation of Article 17.
2029 Q1–Q4	Conformity checks for the national measures transposing Article 9(2), points (j) and (k)	Assessment of whether the notified national measures correctly transpose Article 9(2), points (j) and (k).	The conformity check should be completed within 16 to 24 months of the communication of the national transposition measures. Assuming timely communication by 26 November 2027, the indicative completion window runs from March to November 2029.
2029 Q1	Tenth quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table format continues, but the aim shifts to make sure that every stakeholder is ready to start applying the Directive in its entirety in 2029.	
2029 Q2	Eleventh quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table format continues, but the aim shifts to make sure that every stakeholder is ready to start applying the Directive in its entirety in 2029.	
2029 Q2	Completion of the completeness check for the transposition of Article 17 and the remaining provisions subject to the 26 November 2028 deadline	Verification that all Member States have communicated the national measures necessary to transpose the provisions concerned.	The completeness check should be completed by 26 May 2029, six months after the transposition deadline of 26 November 2028. Where a Member State communicates its measures late, the check should be completed within six months of that communication.
2029 Q3	Twelfth quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table format continues, but the aim shifts to make sure that every stakeholder is ready to start applying the Directive in its entirety in 2029.	
2029 Q4	Final quarterly experience sharing meeting of the Committee (online)	Voluntary tour de table format continues, but the aim shifts to make sure that every stakeholder is ready to start applying the Directive in its entirety in 2029.	
	Full application of the Directive(s)	Directive becomes applicable in its entirety.	
2030 Q1–Q4	Conformity checks for the national measures transposing Article 17 and the remaining provisions subject to the 26 November 2028 deadline	Assessment of whether the notified national measures correctly transpose the provisions concerned.	The conformity check should be completed within 16 to 24 months of the communication of the national transposition measures. Assuming timely communication by 26 November 2028, the indicative completion window runs from March to November 2030.
2030	Issuance by default and mutual	Mobile driving licences are technically implemented (legal implementation should align with the transposition date).	If the review clause under Article 24(3) is triggered

Quarter	Key milestones	Outputs	Notes
	recognition of mobile driving licences		successfully, then this date may be anticipated.
	First Commission report to the European Parliament and the Council	As required by the Directive (Article 24) a report will be drawn up in 2030 and every 5 years thereafter.	As for most of this period the Directive will not be applied, the Report will rely very heavily on the work done during the Implementation Strategy.

7. COMMISSION MONITORING APPROACH

The Commission will employ a multi-layered monitoring procedure combining various tools and methods:

- After the adoption of the mobile driving licence, RESPER and driving disqualification implementing acts, but before the application deadline (2029), quarterly meetings of the Driving Licence Committee will be convened to exchange information on progress and encountered and resolved issues, especially as regards Category I and II provisions.
- Targeted information requests may also be sent where needed to Member States, especially regarding high-complexity implementation provisions.
- In between meetings systematic desk-based reviews will be conducted for all provisions, including technical status overview for mobile driving licences and RESPER.
- After the transposition deadlines, the regular transposition and conformity checks will be carried out, as well as the regular monitoring and enforcement procedures.

8. COMMUNICATION AND TRANSPARENCY

Publication of strategy:

The Commission will maintain a dedicated webpage for the implementation strategy which will serve as the central hub for all implementation-related information and resources. All implementing (or delegated) acts adopted will be published on EUR-Lex in accordance with the relevant procedures.

The following information will also be published:

- Certain guidance documents and templates prepared as part of the execution of the Implementation Strategy;
- Implementation timelines and milestones.

Regular updates:

- The Commission will share all relevant information quarterly with the Driving Licence Committee as part of the experience sharing meetings;
- If an urgent transmission is needed, the Commission will inform the Committee via email, using the regular mailing list.

Electronically signed

Kristian SCHMIDT

ANNEX I – LIST OF THE FORESEEN AIDING AND FACILITATORY MEASURES FOR CATEGORY I AND II PROVISIONS

Measure	Relevant legal provisions	Cat.	Why this category	Commission implementation support measures	Important milestones	Main risks
Mobile driving licences	Arts. 3 and 5; Annex I, Part C	I	New Union mobile format subject to mutual recognition; strong dependence on technical specifications, interoperability, security and trusted issuer arrangements. This is true both for the issuer and verifier side.	Preparation of the implementing act under Article 5(7) Provide financial support to facilitate the roll-out under the Digital Europe Programme (DEP) (DIGITAL-2025-BESTUSE-TECH-09-MDL) Ensure that the European Digital Identity Wallet implementation's steps are coherent with the mobile driving licence framework and provide the required technical channels to Member States so that they can advance implementation and fulfil their obligations. Hold regular implementation discussions together with Member State transport and Wallet experts in the “Mobile Driving Licence Workstream” of the Driving Licences Committee.	Adoption of the Implementing Act is planned for Q3 2026. The dialogues in the “Mobile Driving Licence Workstream” will take place afterwards, once every couple of months. While the call under the DEP has already ended and a consortium was established. The deadline for Member States’ transposition is 26 November 2028, but the deadline for technical implementation and mutual recognition will be around the end of 2030 (see Article 3(4) and (6)). However, the activation of the review clause in Article 24(3) may anticipate this deadline.	Divergent operational levels, lacking interoperability, delayed IT delivery or weak verifier readiness may undermine interoperability and mutual recognition, and/or lead to undue disadvantages for citizens (e.g., not being able to use their mobile driving licence after the deadline for mutual recognition has passed, or get fined for not carrying the physical licence) and increased fraud (if verifiers are not ready technically and operationally to make use of the security advantages of digital documents).
New categorisation, in particular for B and B1 category licences, and staging and equivalence rules	Art. 6(1)(a) to (c), Art. 7(2)(d), Art. 9(2)(j) – (k), (3) and (4)(c)–(d); Annex I, Part E; Annex V	I	High-complexity package of revised B/B1 categorisation, staging and equivalence rules, covering heavy quadricycles, mass and weight thresholds, motor caravans, emergency vehicles and certain alternatively fuelled vehicles, including associated training/testing requirements and Union codes. Moreover, the changes made to the AM and A1 categories (e.g. clarification on maximum net power and allowing the mutual recognition of national equivalences granted for category B licences, to also drive category A1 vehicles), coupled with the general road safety and freedom of movement aspects surrounding such vehicles (in particular in the field of micromobility) should also be addressed.	Table on the new B/B1/A1 category driving privileges setting out their applicability. Dedicated Q&A document(s). Bilateral meetings on the new B1 privileges, in case of interest. Guidance on the road safety and freedom of movement relevance of category AM and A1 vehicles, or adjacent but uncategorised vehicles (in particular in the field of micromobility).	Article 9(2)(j) – (k) has to be transposed and applied from 26 Nov 2027; the other rules align with the general DLD transposition/application dates. As such, the Table and Q&As that are most relevant are the ones referring to Article 9(2)(j)–(k) rules; these will therefore be prioritised.	Misclassification, inconsistent use of codes, unlawful additional requirements imposed, or divergent equivalence rules may create enforcement confusion, recognition problems and road safety risks.

Annex II requirements on tests, knowledge, skills, and behaviour	Art. 10(1); Annex II; Annexes V and VI where relevant	I	Safety-critical set of provisions, requiring coordination between transport authorities, driving licence issuing and administration authorities, driving schools, instructors, trainers, examination bodies and road safety authorities. It requires updates to national curricula, teaching methods, training materials, theory and practical test content and quality assurance arrangements, with direct expected impact on road safety outcomes. This set of measures should be implemented in close coordination with the examiner requirements, since updated training and testing content can only be effective if examiner manuals, examiner training and examination practice are aligned.	Workshops and best-practice exchanges; Expert Group discussions. The goal is to provide a forum for discussions between all relevant stakeholders, and to allow the implementing parties to learn from each other.	While this measure aligns with the general transposition/application deadlines, preparatory work should start early, as updates to curricula, training materials, test contents and instructor/trainer preparation may require long lead times. Accordingly, this will be accounted for during the organisation of the workshops and other meetings.	Formal transposition without effective changes in training and testing practice; uneven implementation across driving schools and examination centres; insufficient preparation of instructors, trainers and examiners; limited impact on novice-driver risk and wider road safety outcomes.
Medical fitness to drive	Art. 11; Annex III	I	Safety-sensitive area requiring coordination between (at least) transport and health authorities; risk of too diverging or insufficient approaches, leading to fitness check-based driving licence tourism.	The Directive grants broad freedom to Member States to implement the most appropriate variation of measures under Article 11, considering their population, resources and health care system. At the same time, the measures taken and the system established must be adequate to generally ensure compliance of fitness with Annex III and national rules and has to be compliant with the framework of Article 11 as well. In view of the cross-sectoral and safety-sensitive nature of these provisions, Commission implementation support should focus on workshops, exchanges of best practices and discussions within the Expert Group. This work should also facilitate cooperation within the EU road-safety health community, as envisaged in Article 11(7). Particular attention should be given to the guidelines and public-awareness campaigns developed by Member States under Article 11(7). The Commission could encourage Member States to develop such initiatives where appropriate and provide a forum for sharing them, with a view to promoting coherent approaches, supporting public understanding and reducing the risk of divergent implementation. In line with recital 35 of the DLD, these exchanges may also inform any future review of the conditions relating to obstructive sleep	While this measure aligns with the general transposition/application deadlines, preparatory work should start early, as the cooperation and planning the implementation involves complex cross-sectoral cooperation and substantial planning between transport and health authorities.	Insufficient health-transport coordination or general planning leading to inadequate transposition and insufficient (or even harmful) safety effect.

				apnoea syndrome and the treatment of impaired vision under Annex III. .		
Driving disqualifications	Art 15a-15g, Art 16 and Art. 22(3a) (Directive (EU) 2025/2206)	I	New cross-border framework for certain driving disqualifications, requiring legal powers, procedural safeguards, designated authorities and reliable IT/network exchanges through the EU driving licence network.	The backbone of the new rules will and has to be the information exchanged through RESPER. Both as regards implementing a driving disqualification (notification, standard template, follow-up questions) and as regards enforcement (information must be readily available to lead to the application of the correct legal consequences after the driving disqualification is EU-wide). As such, the first support provided for this measure will be the adoption of the implementing acts under Article 15a (5) and 22(5) of the DLD, and any financial support provided to improve RESPER should also be counted towards improving this specific provision as well. Beyond this, at least one Guidance document is foreseen to clarify the Commission interpretation of the rules, and/or Q&A document as well. Finally, as the measure has a strong interplay with national rules, voluntary bilateral meetings will explicitly be offered to brainstorm how to best align national and EU rules.	The Implementing Act is planned to be adopted in Q4 2026. The Guidance, Q&A and bilateral meetings are planned for 2027. The transposition/application dates are aligned with the general one.	Delays in notification/implementation, divergent application of rules, insufficient information exchange leading to patchy enforcement and/or undue/unlawful drawbacks for the person concerned.
Normal residence	Art. 20	I	Determines the competent Member State for issuing, renewing, replacing or exchanging a driving licence; divergent interpretation may facilitate driving-licence tourism or create barriers to free movement.	Guidance on normal residence, including relevant (by analogy) CJEU case-law and practical examples; FAQ; best-practice exchange. There could also be the possibility, if needed, for workshops or expert groups. Also taking into account the new rules (e.g. diplomatic missions, extraordinary situations, obtaining the B licence in Member State of citizenship).	The general DLD transposition/application timelines applies, and the normal residence rules are already in place under Directive 2006/126/EC, so the aiding measures are planned for Q4 2027/Q1 2028.	Divergent interpretation may lead to legal uncertainty, licence tourism risks or disproportionate barriers to free movement.

Mutual assistance and EU driving licence network / RESPER	Art. 22	I	Core technical infrastructure for mutual assistance and administrative cooperation, verification, anti-fraud measures, exchange/replacement, mobile driving licences and driving disqualifications.	Art. 22(5) implementing act and revitalisation of the RESPER Working Group of the Driving Licence Committee afterwards. Moreover, the Commission services keep providing helpdesk support.	The Implementing Act is planned to be adopted in Q4 2026. Afterwards, Member States will have until 26 November 2028 to transpose any necessary rules. The new technical rules must be then applied as from 26 November 2029. The sole exception is the technical background necessary for the implementation of Article 17 (as that applies from 26 November 2028).	Technical incompatibility, slow or failed data exchanges may undermine mutual assistance, fraud prevention, verification of driving rights and enforcement of driving disqualifications.
Physical licence microchip / QR code verification	Art. 4(5)-(7); Annex I Parts B-D	II	Optional features but technically sensitive; affects document security, authenticity verification, data minimisation, anti-fraud safeguards and data retention.	Assess the situation in dedicated meetings, after which start works on the implementing act referred to in Art. 4(6) (QR code interoperability) and assess whether the revision of Part B of Annex I of the Directive is needed or not.	Art. 4(6) Implementing Act has no fixed deadline; considering other priorities, unless there is a clear need to act on this topic, the adoption of the implementing act and/or any other measure is not foreseen before 2028 (the earliest). In case a need arises, it will be individually assessed to allow the best course of action to take.	Divergent security standards, access management and excessive data processing may undermine interoperability, fraud prevention and data protection compliance.
Minimum ages and alignment with Directive (EU) 2022/2561 (the CPC Directive)	Art. 7; Art. 17, where relevant	II	Contains national options and age-related flexibilities with national validity, as well as recognition and enforcement implications. It also includes links with the professional driver/certificate of professional competence (CPC) legal frameworks, regarding certain categories, and should be coordinated with the accompanied driving scheme where relevant.	Table on the new minimum ages' rules, coupled with explanatory notes where needed.		Unclear use of national age flexibilities, national validity or CPC-linked conditions may create inconsistent enforcement, recognition issues or confusion for drivers, operators and authorities.
Validity periods	Art. 10	II	This provision included the core operational process covering eligibility, issue, administrative validity, renewal conditions and the one-holder-one-licence principle.	High level overview document of the new rules, highlighting the changes and novelties in relation to the previous legal framework (i.e. new general 15-year validity for Group 1 vehicles, exceptions, new rules on shortening validity for drivers with temporary documents, etc.).	General DLD transposition/application timelines apply.	Administrative bottlenecks, inconsistent renewal procedures or unclear validity rules may cause delays, user complaints or uneven application across Member States.

Attesting the right to drive during exchange or replacement	Arts. 13 and 14	II	Cross-border operational issue linked to exchange and replacement workflows, temporary attestation of the right to drive during pending procedures, roadside checks and timely verification between Member States. Although the exchange and replacement framework is broadly continued, Art. 14 adds an operational safeguard requiring clear national procedures and coordination between licensing and enforcement authorities. It depends operationally on the EU driving licence network (RESPER), which is addressed separately under Art. 22.	The technical and procedural arrangements supporting the exchange of the information required under Article 14 will be addressed through the RESPER implementing act under Article 22(5). Further explanatory guidance and a Q&A document are also foreseen to support a consistent interpretation and application of these provisions.	The general DLD transposition/application timelines apply.	Delayed or unclear exchange, replacement or attestation procedures may create legal uncertainty, roadside enforcement problems and barriers for mobile citizens.
Third country driving licence exchange	Art. 15, in particular Art. 15(6) and Art. 15(7)	II	The provisions lay down a new structured EU assessment and exchange mechanism for driving licences of certain (to be defined) third countries, based on a Commission assessment of comparable road safety standards, to be carried out in cooperation with the Member States, with implications for road safety, free movement and mutual recognition.	The Commission will hold a pre-consultation with national experts on a cohort of third countries which may, at this stage, be subject to an assessment under Article 15(6). Pursuant to this assessment, the Commission will first prepare an “Indicative Timetable”, to be discussed with members of the Driving Licence Committee. Then the drafting of Art. 15(7) implementing acts on third-country licence exchange conditions begins. If any other guidance is necessary, the best course of action will be assessed on an individual basis.	See in detail under point 6. in the operative part.	The main risk as regards the provision itself comes from its novelty status. Therefore, it is cardinal that the first batch of third countries are identified in accordance with objective and well defined criteria, allowing the Commission and the Member States to adopt the first implementing acts while striking a good balance between ambition and developing the new processes elaborately.
Accompanied driving scheme	Art. 17; Art. 27 link to CPC rules; Annex I, Part E	II	EU framework requiring detailed national implementation, including rules for accompanying persons, correct use of Union code 98.02, notification of additional national conditions, mutual recognition arrangements and road safety safeguards for young drivers. Where relevant, the applicable provisions also ensure coordination with CPC/professional-driver rules.	Several Member States already have an accompanied driving scheme in place; however, these schemes were designed for driving in the national territories, and need to align with the new EU rules. The goal of Commission support is to allow for the newly implementing Member States to learn from the others, and to ensure that the cross-border aspect does not cause issues. As regard the first goal, workshops, best-practice exchanges, and Expert Group discussions should take place. As regards the second goal, the key element will be the adoption of the RESPER Implementing Act, coupled with written clarificatory documents as necessary. The latter will most probably focus on cross-border enforcement advice/difficulties and the need for alignment of	According to Article 29(3), the transposition/application date of this provision is 26 Nov 2028. All Commission support should keep this in mind.	Recognition or enforcement confusion linked to Union code 98.02; divergent or unclear national conditions for accompanying persons; weak communication to young drivers and accompanying persons; insufficient safeguards or monitoring, limiting the expected road safety benefits.

				national frameworks with the EU one.		
Probationary period for novice drivers	Art. 18; Annex I, Part E	II	EU minimum harmonisation rule regarding novice drivers, containing in particular provisions relating to alcohol/drug rules and restraint systems; as only minimum rules are defined at EU level, it should be looked at how best encourage compliance and facilitate enforcement.	Discussions on the alignment of national probationary period systems with the EU-applicable rules. On the basis of the discussions, explanatory documents and/or Q&As will be prepared, and bilateral discussions will be offered to Member States who feel that the system may pose noticeable implementation challenges.	The general DLD transposition/application timelines apply.	Uneven application/enforcement in cross-border context, existence of additional conditions at national level that are not known to drivers, formal transposition without measurable safety impact.

ANNEX II – MOVE C2 GUIDANCE AS REGARDS THE TRANSPPOSITION AND APPLICATION DATES (PREVIOUSLY CIRCULATED VIA EMAIL)

Transposition and application of new DLD rules, in particular on driving alternatively fuelled vehicles with a category B licence
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Disclaimer: This Guidance expresses the views of the Commission services and does not commit the European Commission. Only the Court of Justice of the EU is competent to authoritatively interpret Union law.

The transposition and application of certain provisions of the new driving licence Directive ([Directive \(EU\) 2025/2205](#)) has been the subject of several questions the Commission services received. With this guidance, the services of the road safety unit of DG MOVE (C2) would like to share their understanding concerning the issues raised

General interpretation

Taking measures in relation to a Directive earlier than the deadline for transposition contained therein is generally an available choice for Member States, the limits of which are set by the case-law of the Court. However, Article 29 of the new Directive does not only set transposition dates, but also application dates. Paragraph 1 lays down that: “*Without prejudice to paragraph 2, by 26 November 2028, Member States shall adopt and publish the measures necessary to comply with this Directive. They shall immediately inform the Commission thereof. Without prejudice to paragraph 2, they shall apply those measures from 26 November 2029.* (...)”

Such wording indicates that it is essential that the national provisions transposing the rules of the new Directive are applied from the same date in all Member States. **Therefore, while Member States have the possibility to transpose the rules of the new Directive before the transposition deadline, they may not apply them before the relevant dates in Article 29 have passed. The new rules must become applicable on the exact date as provided for in the Directive, to ensure that all actors can exercise their rights and fulfil their duties equally, as any delay could lead to uncertainty and negative consequences in a cross-border context.**

Transition between the new Directive and Directive 2006/126/EC

It should not be forgotten that the new Directive is preceded by Directive 2006/126/EC, the correct implementation of which must still be ensured. According to Article 30(1) of the new Directive, most of the provisions of Directive 2006/126/EC remain in force until 26 November 2029: “*Directive 2006/126/EC is repealed with effect from 26 November 2029, except for Article 6(4), point (c), thereof, which is repealed with effect from 26 November 2027* (...)”.

In this Guidance, we intend to address in particular the relation of Article 6(4), point (c) of Directive 2006/126/EC and Article 9(2), point (j) of the new Directive. Should there be questions regarding any other provision during this period of transition, we will be happy to answer them as a priority.

As regards Article 9(2), point (j) of the new Directive, we have noted that some Member States would like to **apply** this rule, restricted to their respective territory, before the date set in the

new Directive (26 November 2027). We acknowledge that such an earlier application would make sense from a policy point of view. In particular, we are aware of the difficulties in enforcing the restrictions of Article 6(4), point (c) of Directive 2006/126/EC, which are related to the excess of mass of the propulsion system and the cargo capacity in relation to the mass and cargo capacity of a vehicle of the same dimensions which is equipped with an internal combustion engine. Applying the new Directive's provision earlier may in this context better achieve the policy goal of facilitating the uptake of alternatively fuelled vehicles.

For this reason, we analysed the relation of Article 6(4), point (c) of Directive 2006/126/EC and Article 9(2), point (j) of the new Directive with the objective to allow Member States to overcome, in the national context, the shortcomings of Directive 2006/126/EC. By setting a date of application that is two years earlier than the corresponding date for most of the other provisions of the new Directive (i.e. 26 November 2027 instead of 26 November 2029), the co-legislators have acknowledged the importance and urgency of the matter.

However, due to the complexity of the situation, legal certainty and equal treatment cannot be ensured by a flexible interpretation of the relation of those provisions. In particular, in the event that the strict deadlines in Article 29 of the new Directive are not met, the landscape until 26 November 2027 would look as follows: several Member States would not apply any rules for alternatively fuelled vehicles with a maximum mass between 3.5t and 4.25t driven with a category B driving licence, others would apply rules that correspond to the provisions of Article 6(4), point (c) of Directive 2006/126/EC, and the remaining ones would apply (restricted to their territory) Article 9(2), point (j) of the new Directive. This could not only cause confusion for citizens (especially when planning cross-border trips) but would also make it unpredictable for investors planning on buying vehicles falling under the equivalence – they would have to know about the diverging rules that apply in each Member State until 26 November 2027.

In this regard, it seems useful to highlight that the Court has held in case C-63/93⁽³⁰⁾ (Duff and Others, para. 20) that “*legal certainty, (...) requires that legal rules be clear and precise, and aims to ensure that situations and legal relationships governed by Community law remain foreseeable*”. The fragmentation described above (i.e. having three different regimes running in parallel) could be deemed contrary to legal clarity and could lead to litigation by citizens or companies negatively affected by it (for example, in case they were fined or if they cannot invest on equal terms into their vehicle fleet in different Member States).

As such, our conclusion is that, despite the meritorious justifications on policy grounds, until 26 November 2027 the provisions of Article 9(2), point (j) of the new Directive should not be applied even if restricted to the national territory only. To be precise, while it is certainly possible to **transpose** the new rules into the national legislation earlier than the deadline set out in Article 29, it is not possible to apply them before the date given therein, and if the new rules are transposed earlier, they have to contain a provision saying that they **are to be applied from 26 November 2027**.

In the meantime, however, Article 6(4), point (c) of Directive 2006/126/EC remains in force until 26 November 2027. Hence until the rules of the new Directive become applicable, **the current provisions remain available for Member States to apply and rely on.**

⁽³⁰⁾ Judgment of the Court (Sixth Chamber) of 15 February 1996, in Case C-63/93 Duff and others v Minister for Agriculture and Food and Attorney General; [ECLI:EU:C:1996:51](#)