

Towards a more interoperable and liberalised road transport market

The European Express Association (EEA) is the representative organisation for the express industry in Europe.

The express industry is a fast-growing business sector which provides vital services for the European economy, bringing the global marketplace to life. The industry specialises in time-definite, reliable transportation services for documents, parcels, and freight. This means that European businesses can rely on predictable, expeditious delivery of supplies, thereby enabling them to attain and maintain global competitiveness. The express industry employs over 250,000 people across the European Union (EU) and supports a further 175,000 indirect jobs in Europe through the supply-chain.

EEA member companies use different modes of transport depending on the needs and requirements of their customers. The transportation of goods by road is therefore of key importance for our supply chain and a crucial instrument for EU economic growth and competitiveness.

Key actions for the Road Package

The EEA is of the opinion that the European Commission's Road Package will have a positive impact and a lasting effect on the functioning of the EU road transport market if the following actions are envisaged:

- ✓ Complete the internal market for road transport;
- ✓ Achieve an interoperable EU road charging scheme;
- ✓ Improve enforcement of existing EU social rules.

Access to Market and Profession (Regulations (EC) 1071/2009 and 1072/2009)

The lack of a harmonised internal market for road transport is slowing down the development of an efficient, seamless and more environmentally-friendly cross-border transport system:

1. Current cabotage rules, as found in the Commission's report (COM (2014) 222), are difficult to apply and are not implemented in a uniform manner by EU Member States. The report also confirms that relaxing the restrictions to cabotage could contribute to a more economical and resource-efficient road transport sector, as this could lead to a reduction of empty runs, while increasing the sector's economic and fuel efficiency. As the European Express Association, we urge the Commission to take advantage of the benefits of full cabotage liberalisation.
2. The EEA does not see the need to extend the scope of these regulations to vehicles below 3.5 tons. Priority should be given to enforcing the Regulation 1071/2009 and simplify Regulation 1072/2009. Extending their scope would mainly lead to a significant administrative burden for the industry,

especially for SMEs. The EEA calls for a comprehensive impact assessment which analyses the benefits, costs and potential social implications.

3. The Directive on qualification and the training of drivers is a key element ensuring road safety. Every driver, regardless of age, needs the right training to develop safe driving techniques and refresh these on a regular basis. Therefore, the EEA advocates the following:

- ✓ Harmonise the requirements of training and qualification standards to a minimum level to ease the recruitment process of professional drivers, and increase the value of the profession.
- ✓ Clearly distinguish between a professional driver, according to the job description, and an individual driving a commercial vehicle as an ancillary but necessary activity to his/her main job. The Certificate of Professional Competence (CPC) and a professional driving licence for vehicles not exceeding 7.5t shall only be necessary on the condition that driving constitutes the individual's main activity.

Integrate e-learning to replace parts of the in-house training. This would represent a considerable advantage for the driver and transport service company regarding cost effectiveness, time management and administrative procedures.

Road infrastructure charging (Directive 2011/76/EC)

Road charging schemes should be non-discriminatory. The internalisation of external costs of transport, for all modes and equally for freight and passenger transportation, is a principle that needs to be embedded in any balanced and non-discriminatory proposal.

Tackling road freight alone will have a very limited impact on congestion since it represents only 10% of road usage, even at peak hours.

Moreover, resources should be devoted to upgrading the road transport infrastructure in order to reduce bottlenecks. For this purpose, a 100% earmarking provision should be included in EU legislation. Earmarking of all revenues to be re-invested in road transport would reduce the external effects of road transport by providing, among others, incentives for cleaner vehicles technology.

Express companies are keen to reduce the external costs of transport, notably through regular fleet renewal. These efforts need to be complemented through public investments in infrastructure and technology.

Social Pillar (Regulation (EC) 561/2006 and Directive 2002/15/EC)

Better enforcement of already adopted EU social rules in a consistent manner across all EU Member States is needed to ensure fair competition on the market. Any further regulation should be avoided as it would limit the necessary flexibility of the industry.

So far, the provisions of EU Regulation 561/2006 on driving and resting periods have been subject to a number of different interpretations and subsequent enforcement challenges. This resulted in operational complexities across the EU especially when a number of EU Member States adopted stringent measures banning regular weekly rest in the vehicle, as happened in France and Belgium in 2014. Implementation

must follow the principles of proportionality and non-discrimination whilst allowing free movement of services and goods.

Furthermore, the EEA would like to stress that vehicles of 3.5t should in no circumstances be brought under the scope of Regulation 561/2006 and Directive 2002/15 on working times because the main activity of the drivers of these vehicles does not constitute driving, but delivering in city centres.

The EEA suggests three elements for future social policy in the transport sector:

- ✓ **Uniform implementation:** On Regulation 561/2006 (driving and resting regimes), a uniform implementation across Europe would provide more certainty for operators crossing different borders and would certainly increase compliance with the rules.
- ✓ **Better enforcement:** National enforcement authorities should be better trained about the social rules to identify the breaches in a consistent way across of the EU.
- ✓ **Appropriate infrastructures:** There is a need for safe and secure parking and rest infrastructure facilities. The issue of (night time and weekend) driving bans hinders the flow of traffic and puts an additional burden on already limited parking spaces close to the borders with Member State which are implementing driving restrictions; efforts should be undertaken to limit these restrictions.
