

UETR MANIFESTO FOR THE EUROPEAN ELECTIONS 2014



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ABOUT UETR

UETR was founded in 1998 and primarily represents and promotes the interests of more than 200.000 SME's (with a total capacity of 430.000 commercial vehicles) in the road transport sector in their relations with the decision-making bodies of the EU.

UETR's mission

1. To have a regular dialogue with EU institutions as well as other stakeholders, networks and sectorial organisations;
2. To give members an effective chance to give their input into EU policy-making;
3. To gather intelligence on current and future policies and legislation;
4. To represent an effective hub for national associations to cooperate and engage in joint projects and activities

Together, we continuously evaluate recent negative developments (fall in demand, fuel cost increases, long term of payment...) and develop appropriate strategies. We work towards ensuring a stronger, more flexible, competitive and sustainable road transport sector in which our members are confidently able to face current and future challenges.

UETR is associate member (sectorial organization) of UEAPME, the European Association of Craft, Small and Medium-sized Enterprises incorporating 83 member organisations consisting of national cross-sectorial SME federations, European branch federations and other associate members and representing over 12 million enterprises with nearly 55 million employees.

UETR's member organisations



ABSTRACT

Over the last years the road haulage and logistics sector has gone through rough economic storms. In addition to this the legislative framework has not made the road hauler's job easier. However one may never forget that almost all goods sooner or later have to be transported to their final destination. The road hauler offering a door-to-door solution still creates an important added value to the whole society.

Nevertheless UETR, the European road haulers association, has to ascertain that for a number of the most important bottlenecks in transport and logistics still no valid solution has been found. This sector, more or less the motor of the European and national economies, is counting on support in this and other issues. UETR want to see these points realized by the new European Commission and Parliament.

Below you will find a brief overview of the themes that are more extensively discussed from page 6.

Internalisation of external costs

- UETR does not agree on the internalization of external costs. Precisely by a differentiation of the tariffs according to the vehicle's emission standard the external costs are already internalized.
- UETR advocates that any application of the principle of internalisation of external costs can only be implemented if this is applied to all modes, including passenger cars.

Interoperability of toll systems in Europe

- UETR is pleased the European Parliament has reached an agreement on the recommendations to realise one single European toll charging system.
- It is now a matter of realising without any further hesitation a full European interoperability of the technologies for an electronic toll.

Professional diesel essential for the sector

- UETR urges that Member States that have a different excise tariff for the so called 'commercial diesel' would still be able to do so after the revised Energy Tax Directive enters into force.
- In the longer term, UETR calls for a so-called European professional diesel.

More with less: the LHV

- Allowing LHV's has important benefits as has been proven by different studies performed.
- The deployment of LHV's reduces the CO2-emissions on average by 27%.
- UETR urges that cross border traffic of LHV's would be legally possible between two Member States which allow the LHV each on its own territory.

Revision weights and dimensions

- The sector wants to continue to take its responsibility in the area of reducing CO₂ emissions. This can be accomplished by (1) the international, cross-border application of existing logistic concepts and (2) aerodynamic modifications to vehicles.
- UETR sees 2 possibilities for a review of the weights and dimensions:
 - adaptations to vehicles with equal permanent loading volume and
 - adjustments that go in the direction of more loading volume.
- UETR advocates that cross-border transport of 44 tonnes-combinations between two neighbouring Member States – each of which allow these shipments on its own territory and this mutual recognition – would also be legally accepted.

The search for alternative fuels

- UETR wants support for the evolution towards alternative fuels.
- UETR pleads that the Member States would be stimulated to financially support investments in vehicles propelled by alternative fuels.
- UETR asks the European Commission, the Council and the Parliament to facilitate and co-finance the expansion of a tank network.

Efficient urban distribution saves unnecessary kilometres

- Congestion in urban areas is one of the most important challenges for road haulers and logistic service providers. Nevertheless urban congestion is primarily caused by passenger cars and not by trucks.
- UETR therefore pleads for developing a general framework at European level within which the Member States and regions can put local accents regarding urban distribution.

Low emission zones negative for logistic efficiency

- The introduction of a low emission zone has little or no impact on obtaining the air quality objectives but is significantly negative for the efficiency and costs of road haulage companies.
- UETR is therefore convinced that measures should be taken primarily in passenger traffic using a large package of options.
- Low emission zones implemented only for trucks will have an undeniably large financial and operational impact on road haulage companies. UETR is deeply concerned about how haulers in an already tough competition will manage to charge for these future costs.

Initial qualification and periodic training of drivers

- Further training of truck drivers is considered to contribute to road safety improvement. A professional upgrade is needed in road transport to face the challenges in the international activity.
- UETR wants to talk about training of drivers of light vehicles also, keeping in mind that these vehicles present far more accidents than heavy vehicles.
- The flexibility of the use of e-learning during the training is an important advantage both for the driver as for the training institute involved.

Tackling unfair (unlawful) competition

- UETR pleads for a balanced competition within the European Union with maximal harmonised operational conditions.
- UETR does wonder about the practical implementation of this European agreement and the speed at which this will happen.
- UETR does not want any unreasonable administrative burden for entrepreneurs.

Roadworthiness package

- UETR is in favour of harmonized periodic roadworthiness tests in the EU.
- UETR wants the scope extended to light commercial vehicles and their trailers.
- UETR supports the introduction of a mileage registration database.
- UETR can agree on the risk-rating system aimed at focusing inspections on vehicles operated by undertaking with poor safety records.
- Members States must follow the same approach for roadside inspections to avoid differences leading to distortion of competition.
- An EU Regulation on cargo securing, which forces the Members states to harmonize their legislation is needed.

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INTERNALISATION OF EXTERNAL COSTS

UETR can agree on the "user pays" principle and for example a toll charge that being dependent of the distance travelled by a vehicle, as well as the emission standard the vehicle corresponds with. But the existing framework is not to be misused in order to increase costs. Thus UETR does not agree on the internalization of external costs. Exactly by a differentiation of the tariffs according to the vehicle's emission standard the external costs are already internalized.

UETR points out that (any) internalization of external costs will raise - at economic level - the issue of a double taxation for companies. On the one hand the already internalized costs of congestion (the working time that is spent in traffic jams, blocked goods ...) and on the other hand the toll itself. It is clear that internalization will increase the price of transport which in the end will be passed on to the final consumer and to the entire European economy.

In addition UETR points out that there is no single framework for the internalisation of external costs neither for passenger cars, nor for rail, inland waterway, sea or air transport. Taking into account the precarious economic situation, UETR wish to see no external costs applied. UETR advocates that any application of the principle of internalisation of external costs can only be implemented if this is applied to all modes, including passenger cars.

If, despite all, one would choose for the internalization of external costs, then UETR is of the opinion that only the current Directive can be applied. The proceeds have to flow back exclusively to investments to resolve the external costs. UETR demands that at least part of the revenue from the tax will be used for the financial support of investments in environment-friendly, 'green' vehicles...

INTEROPERABILITY OF TOLL SYSTEMS IN EUROPE

At the moment 22 Member States have implemented a toll on parts of their road networks for heavy goods vehicles and 12 Member States have a toll for passenger cars. In total there are about 72,000 km toll roads within the EU of which 60% is equipped with electronic toll systems and the other 40% have a vignette scheme. More than 20 million road users, motorists or hauliers, are subscribed to electronic road toll schemes.

For years UETR urges policy makers would take into consideration the cost and user friendliness of the chosen system when determining the technological tools for the calculation of a toll. Despite the 2004 EETS-Directive on the European electronic toll service, neither the Member States nor the regions hurry to align the various toll systems that are in use. Moreover, systems that should be interoperable are yet still generating administrative nuisance and costs.

UETR is pleased the European Parliament has reached an agreement last June 2013 on the recommendations to realise one single European toll charging system. It is now a matter of realising without any further hesitation a full European interoperability of the technologies for an electronic toll. Only this way economies of scale can be realised and the costs for the necessary hardware reduced. Seen from a technological perspective it is not more complicated to create a European wide interoperability of electronic road toll systems than to create an-European roaming for mobile phones or a worldwide interoperability of credit cards.

PROFESSIONAL DIESEL ESSENTIAL FOR THE SECTOR

It is the Greek Presidency's ambition to reach an agreement on the revision of the Energy Tax Directive 2003/96/EC by June 2014. It is to be expected that the taxation levels on diesel will be increased while there is no certainty at all that Member States will still be allowed to differentiate between commercial and non-commercial use of gas oil used as propellant.

It goes without saying that due to the economic crisis of recent years each new increase of excise duties on diesel will be the last straw for many companies in road haulage. The competitiveness is extremely weakened. UETR therefor urges that Member States would still have the possibility of a lower excise duty tariff for commercial diesel usage after the revised Energy Tax Directive enters into force.

Unlike the Commission, the European Parliament wants to maintain the system for now. A compromise was launched earlier by the Cypriot Presidency that would allow this so-called professional diesel to 2023. In a more short term UETR pleads to maintain this possibility in those Member States that wish to do so.

In the longer term, the organization calls for a so-called European professional diesel: any increases in excise duty on diesel, in the context of passenger cars, would not apply to trucks.

One must keep in mind that there's still no competitive alternative for the diesel engine for trucks in contrast to the market of passenger cars. Even during the next decade possible alternatives will be limited to tiny percentages of the HGV fleet market in the Union. The EU legislation can and must continue to keep this in mind.

In relation to the use of alternative sources, it should be noted that for the fuel the problem is not technological but rather infrastructural: for example, such fuels require an extensive network of filling stations across the EU, without which even the greenest and most advanced vehicle is of little use.

MORE WITH LESS: THE EMS

Allowing LHV's has important benefits as has been proven by different studies performed by a.o. Rijkswaterstaat Nederland. These vehicle combinations generate benefits both to business economics as well as to society. They can carry up to 60% more than an ordinary vehicle combination with the same amount of fuel and drivers. As a result, the deployment of LHV's reduces the CO₂-emissions on average by 27% and generates a cost saving of 20%.

Since fewer trucks are needed and the amount of vehicle kilometres drops, also the risk of accidents statistically decreases. If more such combinations are allowed on the roads, this also improves the accessibility. Also at European level a study of Transport Mobility Leuven, commissioned by the European Commission, supports the merits of the LHV.

UETR urges that cross border traffic of LHV's would be legally possible between two Member States which allow the LHV each on its own territory.

REVISION WEIGHTS AND DIMENSIONS

The truck's combustion engine of the year 2014 is at the top in the field of the limitation of emissions and consumption. From a purely technical point of view there is almost no more additional saving to achieve in the area of fuel economy and energy efficiency or only to a limited extent, while the big breakthrough of other power trains will still take quite a few years. Therefore the euro 6 standard which all new trucks now must comply with, will not have a successor with even less emissions. The resulting tension between, on the one hand, the pursuit of reduced emissions and on the other hand, a reduction in CO₂ emissions makes that other measures are needed to reduce consumption and emissions.

The sector wants to continue to take its responsibility in the area of reducing CO₂ emissions. This can be accomplished by (1) the international, cross-border application of existing logistic concepts (such as the 45' container and LHV) and (2) aerodynamic modifications to vehicles.

The current Directive 96/53 on weights and dimensions imposes stringent restrictions on both possible solutions. For example, the road transport of a 45' container is limited to purely national transport prior to or following a main transport by another mode. And as length is concerned, it is not possible to use so-called boat tails at the rear of the semi-trailer while maintaining the existing loading volume. Also the use of an aerodynamic front at trucks is today impossible within the current rules.

UETR sees 2 possibilities for a review of the weights and dimensions: adaptations to vehicles with equal permanent loading volume and adjustments that go in the direction of more loading volume. One does not exclude the other.

The proposal to amend Directive 96/53 as suggested by EU Commissioner for transport Siim Kallas contains a number of positive steps in this direction (e.g. proposals for simplified transport of the 45' container, exceptions to the weight restrictions for hybrid or electric vehicles). But on some key issues, the proposal is not enough. There are no changes to the European rules concerning the transport neither of high cube containers nor in the area of cross-border transport with 44 tonnes between two Member States that allow this maximum weight each on their own territory. As a result, there remains a significant legal uncertainty. UETR advocates that cross-border transport of 44 tonnes-combinations between two neighbouring Member States – each of which allow these shipments on its own territory and this mutual recognition – would also be legally accepted.

THE SEARCH FOR ALTERNATIVE FUELS

Oil is becoming scarcer and more expensive. At the same time, the European Commission formulated in the 2011 White Paper on Transport its objectives and aims for a reduction of CO₂ emissions in the road transport sector of 60% by 2050 compared to 1990. By 2030 the aim for transport is a reduction in greenhouse gas emissions of 20% compared to 2008. Specifically, the Commission states that the use in cities of vehicles running on conventional fuels should be halved by 2030. By 2050, this should be completely prohibited. City distribution should be as good as CO₂-free by 2030. Alternative fuels offer undeniably an outcome. Even more than is the case for passenger vehicles the big breakthrough of alternative powertrains for trucks is not yet for tomorrow. Today it is difficult to say what technology must or shall take precedence. Especially for heavy trucks – best suited for inter-urban transport and definitely for the longer distances – there is a consensus that diesel will certainly remain the propellant for the vast majority of all vehicles for at least another 15 years. Nevertheless UETR wants support for the evolution towards alternative fuels. Possible applications in intra-urban transport are perhaps the easiest to realize.

Vicious cycle

To make an alternative fuel a success, there must be sufficient tanking possibilities. But before alternative fuel filling stations are to be built, there must be a sufficient number of vehicles using that type of fuel as a propellant. Transport entrepreneurs will only invest in such vehicles if there are sufficient tank possibilities. This vicious cycle must be broken. The European authorities can play an important role by subsidising investments in alternative fuels.

In summary it can be said that three main premises must be met in order to achieve a major breakthrough of alternative fuels:

1. Vehicles on alternative fuels must be economically more beneficial than their traditional counterparts.
2. The 'alternative' vehicles must be technically reliable. This means that they have at least the same working capacity with a similar maintenance scheme and that repair costs and loss don't increase.

3. There must be a good network of filling stations available.

The main reason why alternative fuels haven't yet massively broken through at present is exactly a combination of, on the one hand, the lack of sufficient filling stations and charging points and, on the other hand, the significantly higher investment costs for this type of motor vehicles. The required range is currently insufficient for most alternatives or there are not enough tanking possibilities. In addition, road haulers hardly have any financial margin for this type of investment.

UETR pleads that the Member States would be stimulated to financially support investments in vehicles propelled by alternative fuels. Furthermore UETR asks the European Commission, the Council and the Parliament to facilitate and co-finance the expansion of a tank network.

At the same time UETR wishes to stress that the economic viability of alternative fuels must not be achieved only by raising the existing taxes and excise duties on diesel trucks. This will only increase the operational costs and is therefore contra productive.

EFFICIENT URBAN DISTRIBUTION SAVES UNNECESSARY KILOMETRES

Cities are important centres of public life and generate a large demand for transport of goods. Interurban goods transport can also have a regional or even international dimension in the case of cities located in border regions: decisions of municipal authorities or a Member State can have important consequences for road haulers (e.g. low emission zones in cities or a prohibition on transit traffic).

Urban mobility is a central part of transport even over long distances. Most transport, both of passengers as well as goods, starts and ends in urban areas en crosses several urban regions on its way. Congestion in urban areas is one of the most important challenges for road haulers and logistic service providers. Nevertheless urban congestion is primarily caused by passenger cars and not by trucks. Traffic jams do not only cause enormous delays but also an unnecessary increase in fuel consumption and they reduce the efficiency of urban freight traffic. Road haulers prefer to deliver goods during the congestion free hours but very often they are unable to do so because of local regulations or problems with the opening hours of loading and unloading locations. Urban areas must therefore offer efficient last mile transport for both freight and passengers. They are of vital importance for the competitiveness and durability of our future European transport system.

The responsibility for policies regarding mobility lies mainly with local, regional and national authorities. Every measure taken has an important influence on the way freight traffic by road is organised. UETR therefore pleads for developing a general framework at European level within which the Member States and regions can put local accents regarding urban distribution. Based on that framework one can see to it that local authorities throughout Europe take comparable measures in order to avoid non-efficient and uncoordinated actions by local, regional or even national governments.

Time windows

Many cities and municipalities make use of time windows in order to ban trucks as much as possible from their town centres. Very frequently these time windows differ from one city to another. Such a measure is consequently very drastic for the logistic efficiency and increases without any doubt the costs for road haulers and logistic service providers that have to deliver on different locations within different cities or municipalities. It becomes more difficult to combine multiple small(er) deliveries on one single vehicle (trip). This problem occurs even more due to the strong progression of e-commerce. The consumer wants his or her order to be delivered where and when he or she wants. As a consequence additional vehicles have to be used to deliver the same quantity of goods within the same time frame. This has a negative impact on the environment: more vehicles, more congestion, more kilometres, more fuel, more emissions... One has thus to strive towards a maximum harmonization of time windows so that the logistic efficiency can be safeguarded.

LOW EMISSION ZONES NEGATIVE FOR LOGISTIC EFFICIENCY

The last decades there is a growing attention to climate and air quality. For many years now the road haulage sector for remuneration or hire delivers lots of efforts in terms of a reduction in the emission of harmful gases. By using cleaner fuels and better combustion techniques the emission of substances as NOx and PM (particulate matter) has already been significantly reduced, among other things through the ever tighter Euro emission standards for trucks. Ever since the introduction of these standards the NOx emission has decreased by 86% and PM by at least 95%. This makes the truck one of the cleanest vehicles on the European roads.

Even so more and more governments choose for a compulsory limitation of vehicle emissions by technological innovations and for rules of conduct in order to achieve general awareness. Low emission zones were introduced in several European countries in order to improve the air quality in cities by reducing the emission of harmful gases by road users.

The introduction of a low emission zone has little or no impact on obtaining the air quality objectives but is significantly negative for the efficiency and costs of road haulage companies. Also the costs for society threaten to exceed the benefits. Research in Belgium has shown that the introduction of low emission zones exclusively for trucks is not a recommendable measure. After all newly sold trucks have become much more fuel-efficient and cleaner as a result of which the potential environmental benefit becomes ever smaller. Trucks have a limited economic service life and are regularly replaced by vehicles that are compliant with the most stringent Euro standards. Because of that every year more and more trucks comply with the standard to achieve. If low emission zones would only apply to trucks the reduction of emissions would be limited while as the cost for signalisation and control would increase considerably. Moreover most emissions in urban traffic come from passenger cars. UETR is therefore convinced that measures should be taken primarily in the field of light passenger vehicles.

Low emission zones implemented only for trucks will have an undeniably large financial and operational impact on road haulage companies. The total transport costs will increase without any doubt. In order to comply with the environmental standards in vigour, road haulers have to replace their vehicles much sooner or use them differently. A larger road hauler has more flexibility and will use new vehicles in urban areas. The old vehicles can be used for all other non-urban trips until the end of their service life. However for most transport SME's this flexibility is not an option.

Due to the economic crisis the financial situation of transport companies and road haulers has worsened and so it is completely impossible to carry additional charges and efforts. The principles of economics require that road haulers must integrally charge the shippers for the price increase. Nevertheless UETR is deeply concerned about how haulers in an already tough competition will manage to charge for these future costs.

INITIAL QUALIFICATION AND PERIODIC TRAINING OF DRIVERS

Relating to the Directive 2003/59/EC UETR supports the vision towards ever less fatalities in traffic. Any measure making this goal coming closer with acceptable costs can be envisaged. In this manner further training of truck drivers is considered by UETR to contribute to road safety improvement. A professional upgrade is needed in road transport to face the challenges in the international activity.

Mutual recognition of the national training requirements can be considered as sufficient under the condition that the standard of training requirements is equal or at least at the same level. Nevertheless until today the harmonization is insufficient with regards to the in-depth contents of driver training. Especially the quality of training throughout the EU may differ very much and is linked to the Member State competence of qualified training centers.

Periodical training keeps the knowledge and the qualifications of the drivers at level. It is yet too early to evaluate if the Directive has actually met the objective to increase safety on European roads, since many member states have given their drivers the opportunity to fulfil the requirements only in September 2016. UETR wants to talk about training of drivers of light vehicles also, keeping in mind that these vehicles present far more accidents than heavy vehicles. All professional drivers need a professional training independently of the economic sector or the type of vehicle.

The directive has not enhanced the workers mobility. The free flow of drivers in EU is accelerated by the aging population in some member states causing lack of workers, especially truck drivers but the Directive has only marginally contribute to the creation of a level playing field for drivers and undertakings. Equal conditions for competition are somewhat depending on an equal standard of training, but a lot more on a better social harmonization of social security rules and labour costs.

The training should be certified issuing a Driving Qualification Card, of a completely harmonized format so there would not be any problem to the driver accrediting the necessary possession of CPC, besides being far more practical.

Professional training should be regarded to follow reality, where professional needs may be wider than the goals which are included in the Directive. Even in the perspective of security not all the goals of the Directive are relevant for all drivers and some drivers need more specific courses (e.g. ADR, lift truck...). Some trainings not being compulsory for every single driver, it must be possible for the driver to make choices in which field he follows recognized trainings. In this way it will be possible for him to follow those trainings that he needs the most. In regard of the permanent trainings, the content of the training ought to be wide enough to allow the driver to have some niche specific trainings.

In the Directive there is no provision regulating the use of e-learning during the training. Nevertheless the flexibility of e-learning is an important advantage and this goes both for the driver as for the training institute involved. The uniformity of periodic trainings could be achieved by a not restrictive European syllabus because the first priority is the equal quality/level of trainings. UETR defends the idea that nevertheless, the option should be maintained for Member States between the actual two possibilities for organization of the trainings.

We see that there is a difference in the requirements for training centers in the different EU Member States. There is a need for harmonized criteria and requirements regarding the equipment and the qualification of the trainers.

TACKLING UNFAIR (UNLAWFUL) COMPETITION

UETR is pleased that for the first time it was decided to have a European approach to tackle unlawful competition. The national initiatives that were taken so far, are difficult to enforce or even uncontrollable. Systems such as a chain liability for the transport sector can only work if they are applied across the EU.

Also checks are to be concentrated on severe infringements. In particular the number of checks specifically regarding social dumping is to be increased. Up till now the efforts of the inspection services are too often concentrated on things which entrepreneurs consider as less important and without impact on fair competition.

UETR pleads for a balanced competition within the European Union with maximal harmonised operational conditions. In such an environment there is no place for plain letterbox companies which have no activity in the country of settlement but have all their business in another Member State.

UETR does wonder about the practical implementation of this European agreement and the speed at which this will happen. UETR does not want any unreasonable administrative burden for entrepreneurs. The organisation wants to start up the dialogue with all stakeholders as soon as possible over the details of this introduction.

ROADWORTHINESS PACKAGE

In the interest of completing the EU single market UETR is in favor of harmonized periodic roadworthiness tests in the EU. However as long as there are no uniform testing periods and no uniform testing standards, UETR prefers testing in the Members States where the vehicles are registered. A standard EU form for roadworthiness tests can ensure EU-wide verification of roadworthiness certificates during technical roadside inspections.

The scope of testing will be extended to cover fast tractors, capable of speeds in excess of 40 km/h (T5), which are used for commercial road haulage purposes. UETR evaluates this positive. Tractors that are not solely used for agricultural purposes need to be subject to periodic tests, as they are not designed for transport and are unsafely at the road (no blind spot mirrors, no underrun protection...). Tractors being used as alternative for lorries are furthermore causing unfair competition.

UETR wants the scope extended to light commercial vehicles and their trailers. A study on this category within five years as proposed in the agreement between Parliament and Council, does not go far enough, viewed the increasing trend of road fatalities by this category of vehicles.

To avoid mileage fraud UETR supports the introduction of a mileage registration database, in which the odometer readings of the vehicles registered in a Member State are stored.

UETR can agree on the risk-rating system aimed at focusing inspections on vehicles operated by undertakings with poor safety records, thus rewarding vehicles operated by undertakings which are safety and environment minded. Roadside inspections of commercial vehicles should only be complementary on periodic roadworthiness testing in order to target vehicles posing an immediate threat to road safety. For UETR it's also important that Members States follow the same approach for roadside inspections to avoid differences that could lead to distortion of competition.

As there are no European rules on load securing, UETR fears that controls on cargo securing based on national legislations will lead to legal insecurity. Drivers do not know anymore which rules to follow. The forces that are taken into account differ from standard to standard. More inspections on cargo securing will lead to more fragmentation and discussion. An EU Regulation on cargo securing, which forces the Members states to harmonize their legislation is needed.

A WELL MAINTAINED AND FULLY INTEGRATED ROAD NETWORK

It is clear that a big part of the success of EU economy after World War II is owed to an efficient road network. However in many Member States, especially those who joined the European Union in 2004 or later, road network has not been established yet. In EU-15 another problem is becoming more and more important: the current infrastructure is relatively old (often over 30 years), being designed and developed in the second half

of the 20th century. In the 90s there was hardly any evolution in the road network of these countries, whereas economic growth has continued until 2008. The road capacity there is no longer sufficient and needs expanding in order to cope with the future economic and transport growth and tackle congestion.

UETR does not oppose to applications of ICT and intelligent logistic systems, but such will not be sufficient. In particular, as it is known that over 75% of freight transport is being done over distances of under 150 kilometers, the role of ports and intermodal terminals, albeit important, has no vocation to take away from the roads a large percentage of the total amount of trucks, let alone the expect that in the future the absolute number of trucks on the roads will diminish.