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Date: 15/09/2016 16:33:18

## Public consultation on the review of Regulation 1071/2009 on access to the occupation of road transport operator and Regulation 1072/2009 on access to the international road haulage market

Fields marked with \* are mandatory.

### General information

#### \*1. You answer as

- Citizen/consumer
- Road transport worker (e.g. driver)
- Company engaged in transport chain
- EU Governmental authority
- Inter-governmental organisation
- Enforcement authority
- Regulatory authority (e.g. national transport regulator, national competition authority)
- Non-EU governmental authority
- Academia
- Other (please specify)

Please specify Other

#### 1.3 Please specify what kind of organisation you represent (for associations/organisations/authorities only)

- Consumer or citizen association
- Association representing road transport workers
- Association representing road transport operators
- Association representing freight forwarders
- Association representing shippers
- Association representing SMEs
- Association of civil society organizations
- Association of national authorities
- Association of regional authorities
- Other

#### 1.4 Please specify the name of the authority/association/company/organisation you represent (for associations/organisations/authorities only)

#### 2. Is your organisation registered in the Transparency Register (<http://europa.eu/transparency-register>) of the European Commission and the European Parliament?

*(for associations/organisations)**If you are an entity not registered in the Transparency Register, please register in the Transparency Register before answering to this questionnaire.**If your entity responds without being registered, the European Commission will consider its input as that of an individual in his own capacity.*

- Yes
- No

#### 2.1 Please indicate your organisation's registration number in the Transparency Register (numbers only)

#### \*3.1. What is your country of residence?

In case of legal entities, please select the primary place of establishment of the entity which you represent.

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland

- France
- Hungary
- Latvia
- Malta
- Portugal
- Slovenia
- United Kingdom
- Germany
- Ireland
- Lithuania
- Netherlands
- Romania
- Spain
- Other (please specify)
- Greece
- Italy
- Luxembourg
- Poland
- Slovak Republic
- Sweden

\*3.2. What is your main geographical area of activity

- National (only home country/country of residence)
- International, only within the European Union and European Free Trade Association)
- International (European Union, European Free Trade Association and other countries)

4. Please indicate your contact details (name, email and telephone number).

You can still opt for your answers to remain anonymous when results are published.

m.luciani@cepi.org

\*5. Do you consent to the publication of your response by the European Commission? Contributions received may be published on the Internet, together with the identity of the contributor, unless the contributor objects to the publication of personal data on the grounds that such publication would harm his or her legitimate interests. In this case, the contribution could be published in anonymous form, i.e. the Commission will not publish the name and contact details submitted in question 4 above (however, should you refer to your name/organisation in reply to the subsequent questions, this will not be taken out). Please note that regardless of the option chosen, your contribution may be subject to a request for access to documents under Regulation (EC) No 1049/2001 (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001R1049>) on public access to European Parliament, Council and Commission documents. In this case, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules (<http://ec.europa.eu/justice/data-protection/>).

- Yes
- Yes, but anonymously
- No

## General questionnaire

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### Extent of the problems

The questions in this section aim at identifying the main problems affecting the road haulage sector and which are linked to the Regulations and assessing their relative importance.

6. It is sometimes argued that the costs incurred by operators to comply with the provisions of the Regulations and the costs borne by public authorities to enforce these provisions are significant.

6.1. Some stakeholders opine that compliance costs for transport operators (i.e. costs to comply with the requirements of the Regulations, such as those incurred to pass a certificate of professional competence) are significant. How do you rate the significance of the compliance costs on your business? *(for companies and associations only)*

- There are no significant compliance costs
- Of little importance
- Fairly important
- Important
- Very Important
- I don't know

6.2. Some stakeholders opine that the costs borne by enforcement authorities (i.e. those necessary to enforce the requirements of the Regulations, for example costs incurred for road side inspections regarding compliance with cabotage rules) are significant. How do you rate the significance of these costs? *(for public authorities only)*

- There are no significant compliance costs
- Of little importance
- Fairly important
- Important
- Very Important
- I don't know

7. Under Regulation (EC) No 1072/2009 (<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32009R1072>), operators from an EU Member State are allowed to carry out national transport operations in other EU Member States (cabotage operations) under certain conditions. Member States' enforcement authorities should ensure that the restrictions to this type of operation laid down in Regulation (EC) No 1072/2009 are respected.

7.1. As regards the level of control exercised in practice by Member States with regard to cabotage operations, do you believe that there is:

- Not much variance between Member States
- Modest variance between Member States
- Significant variance between Member States
- Very significant variance between Member States
- I don't know

If you wish, you may supplement your reply with explanations, examples, facts and figures.

2,000 character(s) maximum

7.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of compliance costs for hauliers                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

\*Please specify Other

100 character(s) maximum

8. It is sometimes stated that the cabotage provisions are unclear or lack precision, for example as regards the question whether one cabotage operation can include several loading and/or unloading operations.

8.1. Do you think that the cabotage rules of Regulation (EC) No 1072/2009 are sufficiently clear in all relevant aspects?

- Yes
- No
- I don't know

If no, please specify which precise aspects of the rules are insufficiently clear. You may supplement your reply with explanations, examples, facts and figures, etc.

2,000 character(s) maximum

8.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of compliance costs for hauliers                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

9. It is sometimes claimed that the cabotage provisions are hardly enforceable. In this respect, it is argued that it is very difficult for enforcement authorities to control whether a given operator has already exceeded the 3-operation limit within 7 days from the last unloading in the host Member State.

9.1. Do you think that the cabotage rules of Regulation (EC) No 1072/2009 are enforceable?

- The rules are easy to enforce
- The rules are difficult to enforce
- The rules are very difficult to enforce
- The rules are virtually impossible to enforce
- I don't know

If you wish, you may supplement your reply with explanations, examples, facts and figures.

2,000 character(s) maximum

9.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of compliance costs for hauliers                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

10. There is significant variation between Member States in terms of the stringency with which the "good repute" criterion for access to the occupation of road transport operator (the requirement that operators must not have committed serious infringements of EU or national law) is checked. For example, some Member States consider that removal of good repute is disproportionate in certain cases (e.g. an infringement committed by a single driver in a 50-truck company could lead to loss of good repute), whereas other Member States are stricter in the same type of cases.

10.1. How far do you think that the different application of the "good repute" criterion of Regulation (EC) No 1071/2009 by Member States constitutes a problem for the road haulage sector?

- This is not a problem
- This is a minor problem
- This is a major problem
- I don't know

If you wish, you may supplement your reply with explanations, examples, facts and figures.

2,000 character(s) maximum

10.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of compliance costs for hauliers                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

11. Several stakeholders claim that "letterbox" companies are being established in the EU, i.e. subsidiaries purportedly dedicated to road transport operations but having no real own activity.

11.1. How far do you consider that operators are setting up subsidiaries (or indeed alleged secondary establishments in other forms) that do not actually conduct own operations?

- This is a minor issue
- There are some cases of the kind
- This is a widespread practice
- I don't know

If you wish, you may supplement your reply with explanations, examples, facts and figures.

2,000 character(s) maximum

11.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of compliance costs for hauliers                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

12. There are indications of a lack of cooperation between Member States in monitoring compliance with the stable and effective establishment criterion (the requirement that operators must have a real and operational establishment in the country where they apply for access to the occupation of road transport operator).

12.1. How well do you consider that Member States are cooperating in monitoring compliance with the stable and effective establishment criterion?

- Member States are cooperating well in this respect
- There are some instances of lack of cooperation
- Member States are not cooperating well in this respect
- I don't know

If you wish, you may supplement your reply with explanations, examples, facts and figures.

2,000 character(s) maximum

12.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of compliance costs for hauliers                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

13. It is sometimes stated that the definition of stable and effective establishment is insufficiently clear, notably as regards the notion of "operating centre".

13.1. Do you think that the definition of stable and effective establishment of Regulation (EC) No 1071/2009 is sufficiently clear in all relevant aspects?

- Yes
- No
- I don't know

13.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

|   |                       |                       |                       |                       |                       |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Increase of compliance costs for hauliers       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

14. Some Member States apply (some of) the provisions of Regulation (EC) No 1071/2009 to vehicles below 3.5 tonnes (which are excluded from the scope of the Regulation) and this leads to different requirements for the same vehicles in different Member States. For example, in some Member States operators using vehicles below 3.5 tonnes do not have to comply with the minimum financial standing requirement for access to the profession, while in others they do.

14.1. How far do you consider that the application of (some of) the provisions of Regulation (EC) No 1071/2009 to vehicles below 3.5 tonnes by some Member States constitutes a problem for the road haulage sector?

- This is not a problem
- This is a minor problem
- This is a major problem
- I don't know

If you wish, you may supplement your reply with explanations, examples, facts and figures.

2,000 character(s) maximum

14.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of compliance costs for hauliers                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

15. Regulation (EC) No 1071/2009 contains four requirements for access to the occupation of road haulier. Namely, an operator must have:

- 1) an effective and stable establishment in a Member State;
- 2) good repute;
- 3) appropriate financial standing;
- 4) the requisite professional competence.

Some Member States impose additional conditions on access to the occupation of road haulier, for example linked to the minimum number of vehicles or to the minimum age of the transport manager, while others do not. This leads to a situation where the same operator may be able to get access to the profession in one Member State, but not in another one.

15.1. How far do you consider that the imposition of additional conditions on access to the occupation of road haulier by some Member States constitutes a problem for the road haulage sector?

- This is not a problem
- This is a minor problem
- This is a major problem
- I don't know

If you wish, you may supplement your reply with explanations, examples, facts and figures.

2,000 character(s) maximum

15.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

|   |                       |                       |                       |                       |                       |
|---|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Increase of compliance costs for hauliers       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

16. Sanctions for infringements of the Regulations (e.g. non-respect of cabotage restrictions) vary widely between Member States. The same infringement can give rise to an insignificant fine in one Member State and a very significant fine in another one.

16.1. How far do you consider that the variation of the sanctions for infringements of the Regulations between Member States constitutes a problem for the road haulage sector?

- This is not a problem
- This is a minor problem
- This is a major problem
- I don't know

If you wish, you may supplement your reply with explanations, examples, facts and figures.

2,000 character(s) maximum

Comparable systems across Member States and some harmonization on the EU level would be helpful.

16.2. What impacts do you think that this issue has:

|  | No impact             | Little impact         | Significant impact    | Very important impact | I don't know          |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| Competitive disadvantage of hauliers from some Member States | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for hauliers                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of administrative costs for Member States           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of compliance costs for hauliers                    | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Increase of enforcement costs for Member States              | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Other (please specify below)                                 | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

17. Do you consider that there are specific issues of significant importance related to the Regulations which are not listed above in Questions 6 -16?

Please explain what these issues are and why they are important.

If you wish, you may supplement your reply with explanations, examples, facts and figures, etc.

2,000 character(s) maximum

18. In the absence of any EU intervention, how do you think that these issues will evolve? Will the identified problems tend to increase or diminish?

2,000 character(s) maximum

In the long term, in the absence of EU rules, the internal market for transport services will continue to erode, as differences between Member States will widen.

## Objectives of a possible intervention

19. Do you agree with the following tentative objectives of the intervention?

|   | Don't agree           | Slightly disagree     | Slightly agree        | Fully agree                      | I don't know          |
|---|-----------------------|-----------------------|-----------------------|----------------------------------|-----------------------|
| To ensure coherent and consistent enforcement of the existing rules in Member States                        | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| To ensure coherent application of the rules in Member States  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| To promote more cooperation between Member States in order to allow more effective cross-border enforcement | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| To reduce the number of letterbox companies   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |
| To reduce the number of illegal cabotage operations   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> |

20. Which other objectives do you consider should drive the review process?

2,000 character(s) maximum

## Specialised questionnaire

### Policy options and impacts

The Commission services have, on a preliminary basis, listed a series of possible policy measures. These measures can involve a revision of the two Regulations, non-legally binding instruments (such as interpretative guidelines), or a combination thereof.

The questions in this section aim at:

- 1) seeking your views on the appropriateness of these measures in view of the objectives identified in section 2.2 above;
- 2) identifying possible additional policy measures;
- 3) assessing potential impacts of the different measures.

21. You will find below a list of potential policy measures which the Commission services have identified on a preliminary basis. Please indicate: 1) whether you agree or not with the general measure or whether you would like to propose a more specific measure; 2) what you expect the impacts of this measure to be.

21.1. Remove the maximum number of cabotage operations (currently 3), while reducing the maximum period for cabotage operations (currently 7 days).

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.2. Include vehicles with less than 3.5 tonnes within the scope of application of Regulation (EC) No 1071/2009. This would mean that, contrary to the present situation, operators using vehicles below 3.5 tonnes would have to comply with (part of) the requirements for access to the occupation of road transport operator (stable and effective establishment, good repute, financial standing and professional competence).

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:



|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.3. Include vehicles with less than 3.5 tonnes within the scope of application of Regulation (EC) No 1072/2009. This would mean that, contrary to the present situation, operators using vehicles below 3.5 tonnes would have to comply with (part of) the requirements for access to the international road transport market (e.g. they would be obliged to respect the cabotage restrictions of the Regulation).

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.4. Review the criteria for stable and effective establishment in order to better ensure that road hauliers have a real activity. Currently, Regulation (EC) No 1071/2009 includes several conditions used to determine whether an operator has a stable and effective establishment in a given Member State (e.g. it must keep its core business documents in premises located in the Member State of establishment, it must have at its disposal one or more vehicles which are registered in that Member State, etc.). These requirements could possibly be complemented with additional ones.

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.5. Further harmonise the enforcement rules with those of the road transport social legislation adopted by the Union. For example, under the social rules each Member State is obliged to organise checks of driving times, rest periods and working time amounting to at least 3% of the days worked by drivers. Currently, there are no such minimum requirements for example for controls related to the cabotage restrictions. It is considered to impose such minimum checks of compliance with the cabotage provisions.

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.6. Extend access to ERRU (European Register of Road Transport Undertakings) to road side check officers. Currently ERRU is only accessible to enforcement authorities through an administrative request. The access to ERRU could be extended to road side officers to help them check in real time whether a company is registered and entitled to carry out international transport operations. This would also allow them to identify high-risk companies thanks to the possibility of checking which most serious offences the company has been convicted for (if any).

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree

- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.7. Introduce penalties for shippers and freight forwarders in case they knowingly commission transport services involving infringements of the Regulations (e.g. illegal cabotage operations), so as to dis-incentivise such behaviour.

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

If you chose "propose a specific or alternative measure", please indicate which (e.g. establish principle that shippers and freight forwarders can be held liable for infringements of the cabotage rules or the rules on stable and effective establishment in case they intentionally commission transport services from hauliers committing these infringements). You may expand on you reply.

2,000 character(s) maximum

We support a completely free market for transport services in the European Union that can improve industry's competitiveness. Liability of shippers should be proportionate. Simple cabotage rules allowing the development of today's complex and international supply chains should be promoted throughout the EU.

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.8. Include the conditions on establishment, financial standing and professional competence in ERRU. Currently ERRU only contains information on good repute. It could be extended to include the conditions on establishment, which would allow Member States to look for letterbox companies in other Member States, for example. The same could be done for the other conditions on access to the profession.

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.9. Promote the use of the digital tachograph equipped with Global Navigation Satellite System (GNSS) capability to identify start and end of cabotage period and target cabotage checks. The digital tachograph equipped with a GNSS function will be available from 2016-2017 and thanks to its new satellite positioning function, will allow enforcers to check from the roadside the movements of a vehicle. This way, enforcement officers can filter vehicles for checks. Compliant vehicles would not be unnecessarily stopped.

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.10. Remove the possibility for Member States to add additional requirements for establishment. Currently, Member States may introduce requirements for engagement in the occupation or road transport on top of those laid down in Regulation (EC) No 1071/2009 (stable and effective establishment, good repute, financial standing and professional competence), provided that these are proportionate and non-discriminatory. This possibility could be removed.

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion                       |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.11. Facilitate cross-border checks on establishment provisions, for example by introducing a maximum time period for replies by one Member State to questions by another Member State regarding establishment (along with a procedure for escalation if these timescales are not met).

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion                       |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|----------------------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.12. Open up the national risk-rating systems to other Member States in order to promote exchange of information on high-risk companies and to target checks. Under Regulation (EC) No 1071/2009 Member States are required to put in place a risk classification system for hauliers covering infringements which may lead to a loss of good repute (and consequently to a loss of access to the profession of road transport operator). However, there is no requirement for Member States to give enforcement authorities from other Member States access to these risk-rating systems.

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.13. Promote common training of enforcement officers from different Member States.

Do you agree with this measure?

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

21.14. Share best practices between Member States on how to conduct cabotage checks.

- Don't agree
- Slightly disagree
- Slightly agree
- Fully agree
- No view
- Propose a specific or alternative measure

In your view which effect would this measure have:

|  | Very negative         | Negative              | No impact             | Positive              | Very positive         | No opinion            |
|--|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|-----------------------|
| on job creation in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on growth in the road haulage sector   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on working conditions  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on road haulage costs  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on reduction of the cost of compliance with the legislation when compared to the present rules | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the economic situation of small transport operators (SMEs)                                  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on the administrative burden for public administrations  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| on non-EU countries  | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |

Would this measure have any other impact? Please specify

2,000 character(s) maximum

22. Would you propose any policy measures other than the ones identified above in Question 21? Please explain what these measures are and why they are important. If you wish, you may supplement your reply with explanations, examples, facts and figures, etc.

2,000 character(s) maximum

## Subsidiarity and EU added value

In any policy initiative, the Commission must consider whether there is added value in EU intervention and whether the level of EU intervention is appropriate, i.e. whether certain issues should be regulated at EU level or should be left for possible regulation at the Member State level.

Please note however that any amendments to existing Union legislation can only be made by the Union legislator itself, not by Member States.

23. Do you agree that the policy objectives evoked above cannot be sufficiently achieved by Member States and should thus be pursued through Union action?

- Yes
- No
- Don't know

If you wish, you may expand on your reply.

2,000 character(s) maximum

## Other issues and further information

24. Are there any other issues with the operation of the current Regulations to which you would like to draw the attention of the Commission or which you consider should be addressed? Please provide details.

2,000 character(s) maximum

25. Please provide references to any studies or documents that you think are relevant for this consultation. Please provide links for online download where possible.

*2,000 character(s) maximum*

26. Please provide information on any successful initiatives at regional, national or international level related to road transport that could support the Commission in the impact assessment exercise.

*2,000 character(s) maximum*

27. Please upload any additional documents (e.g. position papers) to support your contribution to the consultation.

### Contact

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