

## **Final Report**

### **Light Goods Vehicles in the Road Transport Market of the European Union**



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This study has been commissioned by DG MOVE.

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## Executive Summary

### *Main results*

The overall conclusion of the study is that in the European context there is no substantial unfair competition between light goods vehicles and heavier freight vehicles in international commercial road freight transport. Only if an increase of more than 25% of the freight transport cost price for heavier vehicles were to occur and no increase for the light goods vehicles, could this type of competition begin to occur.

### *Introduction*

One of the core objectives of the European Union is the promotion of the free flow of persons and goods on its territory. The flows of persons and goods in turn depend, for a large part, on the optimal functioning of the (international) transport systems. Any unfair competition between (sections of) these systems may therefore hinder the further development of Europe. International commercial road freight transport within the European Union is strictly governed by certain legislation. This legislation addresses, amongst others, the social rules in Regulation (EC) No: 561/2006 and Regulation (EEC) No: 3821/85, the road charging Directive 1999/62/EC and admission to the profession of a commercial road haulage operator. However, these rules apply only to freight vehicles with a maximum permissible weight (own weight plus loading capacity= Gross Vehicle Weight or GVW) of 3,5 tonnes or more.

### *Unfair competition*

A dispute could arise concerning unfair competition between freight vehicles with a GVW of less than 3,5 tonnes (=Light Goods Vehicles or LGVs) and vehicles with a GVW of more than 3,5 tonnes. This is due to the fact that certain elements of the EU legislation mentioned above could cause a rise in the cost price per transported unit of freight transport.

### *Share of LGVs*

The Commission has therefore commissioned this study which should provide insight into the importance of LGVs in long(er) distance international commercial road freight transport. If this share is substantial, there might be a need for a more harmonized EU approach to the legislation that applies to LGVs.

### *Main research elements*

Past studies have shown that the official statistics will not provide the level of detail that is necessary to determine the share of LGVs in international road freight transport. The determination of the share of LGVs therefore has been based on three alternative key elements, namely:

- a cost level comparison between LGVs and heavier freight vehicles
- an analysis on the basis of international freight flow statistics
- a special questionnaire on legislation.

*Final conclusion*

The cost calculation exercises have clearly shown that there is no substantial cost price based competition between LGVs and the heavier and larger freight vehicles. The freight cost price per tonne or per cubic metre of the latter is at least 25% lower than that of a LGV.

The analysis of the bilateral freight flows (in tonnes) between the Member States has shown that on average the maximum share of LGVs in international goods is less than 5% of the total goods flow. A special questionnaire was distributed to the national representatives of the IRU and to the Ministries of Transport of each country in Europe. Although some countries have mentioned in their response to the questionnaire that in their country there might be a problem, the majority have stated that LGVs in international freight transport are not a substantial problem in their country.

The final conclusion therefore is that in Europe there is no substantial unfair competition between LGVs and heavier freight vehicles in international commercial road freight transport.



# 1 Introduction

## 1.1 Preface

This Final Report presents the main results of the EC-project which aimed at gaining insight in the extent to which Light Goods Vehicles (LGVs) are used in long(er) distance<sup>1</sup> commercial freight transport in order to avoid the regulation that applies for light heavy goods vehicles (L-HGVs) and heavy goods vehicles (HGVs)<sup>2</sup>. The members of the consortium are TML, NEA and ISIS.

### **Background**

International commercial road freight transport within the European Union is strictly governed by certain legislation. This legislation addresses, amongst others, the social rules in Regulation (EC) No: 561/2006 and Regulation (EEC) No: 3821/85, the road charging Directive 1999/62/EC and admission to the profession of a commercial road haulage operator. However, these rules apply only to freight vehicles with a maximum permissible weight (own weight plus loading capacity= Gross Vehicle Weight or GVW) of 3.5 tonnes or more.

This means that for the operation of light goods vehicles, which are characterised by a GVW of less than 3,5 tonnes, these rules do not apply. In turn, this may effect the cost per transported unit or per kilometre and thus affect (fair) competition in international commercial freight transport. Furthermore, LGVs appear to perform poorly with respect to road safety and the fuel consumption per transported unit is less efficient, compared to that of HGVs.

## 1.2 Objective

The main objective of this study was to provide the Commission services with economic insight into the importance of LGVs in long(er) distance commercial road freight transport. Special attention has been paid to border crossing transport or transport operations in other Member States (cabotage). On the basis of this inventory an evaluation was made of the extent of competition between the LGVs and the HGVs.

The legal situation of LGVs in the various Member States was addressed as an additional objective. An inventory per Member State of additional relevant legislation for these types of vehicles, where applicable, was also made.

The main result of the study is a clear answer to the question whether there is a need for a harmonised EU-approach concerning the legislation of LGVs. If this is the case, a proposal to redefine the scope of relevant legal acts of the EU road transport acquis should be made.

<sup>1</sup> Long(er) distance= (in this respect) single trip distance of 200 kms and more.

<sup>2</sup> L-HGVs and HGVs are freight vehicles that fall under the scope of the legislation of the European Union.

The answer to the main question stated in the project's objective was based on three key research elements, namely:

- a cost calculation comparison between LGVs, L-HGVs and HGVs,
- the shares of LGVs, L-HGVs and HGVs in bilateral road freight transport,
- the results of a special questionnaire on legislation.

### 1.3 Structure of this Final Report

After this introductory chapter, the most relevant types of LGVs are presented in the second chapter. The third chapter presents the results of an indirect determination of the share of LGVs in international transport. The main results of the statistical data collection phase have been presented in the fourth chapter. And the main conclusions and recommendations to the Commission conclude this report.

In the first Annex several transport related statistics have been shown. The second Annex presents detailed information on the questionnaire; the last Annex, the Country Reports, presents the following information per European country:

- several general (road transport related) figures,
- volume in number of tonnes of the bilateral road freight transport between an origin country and its neighbouring countries,
- the upper limit of the share of LGVs in the bilateral transport flows,
- the main elements of the questionnaire on relevant legislation.

## 2 Types of LGVs

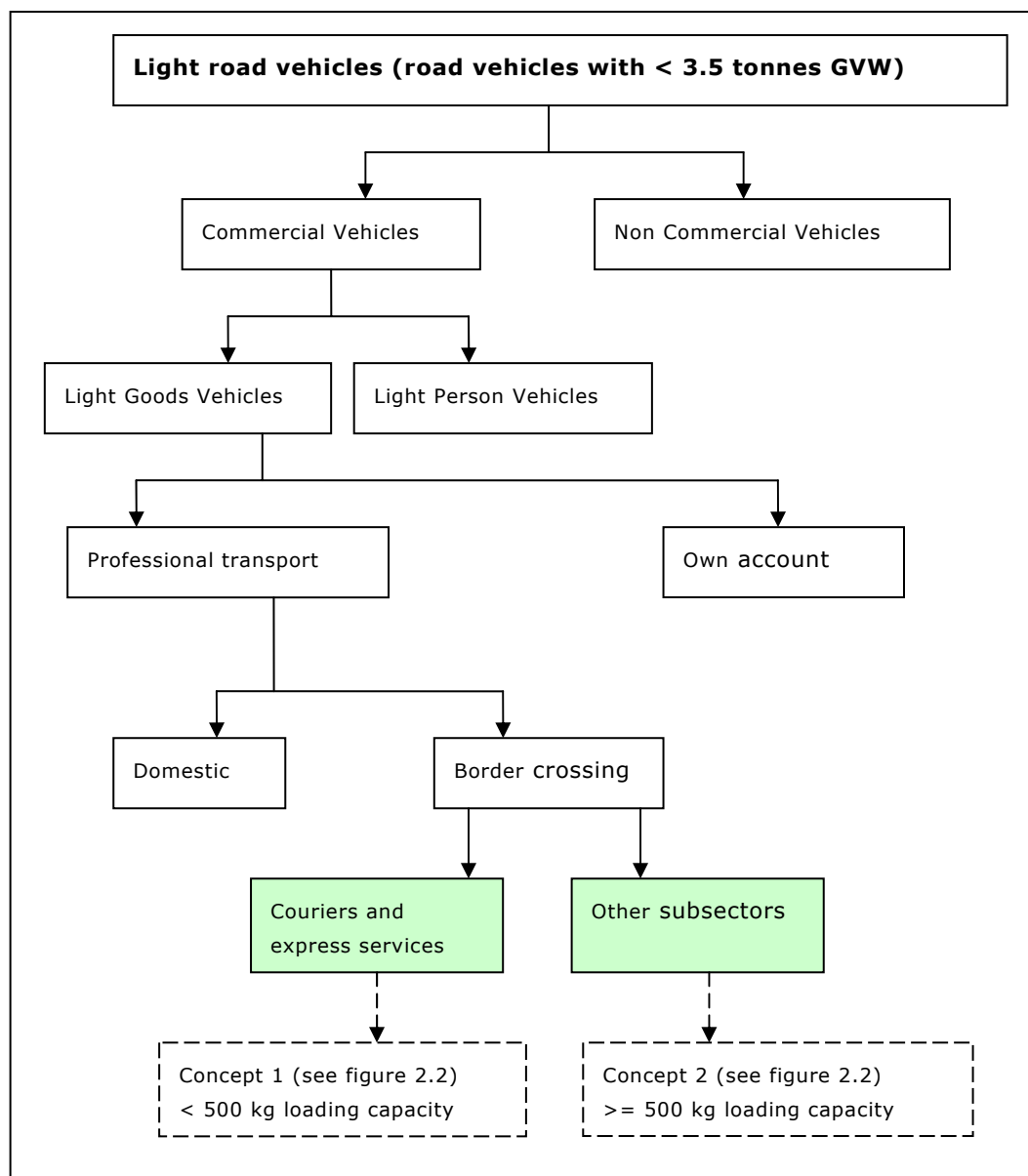
### **Main Classes of LGVs**

Before any result can be presented, a short overview has to be made of the exact configuration of the types of vehicles studied. As seen in the light of this study, in principle, only light goods vehicles (LGVs) were of interest that are used for commercial international road freight transport. Amongst others, from the desk research (see also chapter 4) it became clear that the level of detail that is necessary for this study is not maintained in the statistics that are available at European Union level. Or, with only a very few exceptions, at the level of the individual Member States. The level of detail that is necessary within this study has been presented in the coloured boxes at the bottom of figure 2.1. On average the level of detail that is available in the official statistics corresponds with the box at the top level of this figure.

Two main categories have been distinguished:

1. Commercial (direct origin to destination) couriers and express services with light goods vehicles with a loading capacity of less than 500 kilograms.
2. The commercial light goods vehicles with a loading capacity of more than 500 kilograms and a Gross Vehicle Weight of 3.5 tonnes or less that are active in professional border crossing transport operations.

**Figure 2.1 Overview of road vehicle types with a Gross Vehicle Weight of less than 3.5 tonnes**



**Figure 2.2 Examples of typical LGVs**

Concept 1



Concept 2





## 3 Indirect Share Determination

### 3.1 Introduction

The inventory of statistical data collection (see next chapter) has made very clear that retrieving data on professionally operated LGVs is not easy and at best very fragmentary.

In this chapter an alternative approach has been adopted to determine the share of LGVs. The main question of this study: "Are LGVs a problem in international road freight transport?", will be addressed in a more indirect way but covering all countries in Europe. In this alternative approach three main lines have been distinguished:

- 1 Cost calculation exercises and costs price comparison.
- 2 Determining the upper limit of the share of LGVs in bilateral road freight transport.
- 3 Distributing a special questionnaire on legislation.

The research method and the actual results within these lines will be addressed in detail in the following paragraphs.

In order to be more succinct the results of the cost calculation exercises will be presented for four European regions only, namely: South-west, South-east, North-west and North-east.

In addition to the overview of the main results per region, a summary is presented in the form of a Traffic Light table. In this table, principally "Red" means that for a certain item there could be a serious problem with LGVs in international road freight transport. "Green" means that there is almost certainly no problem. A problematic situation is defined by reaching certain thresholds that are outlined in the last section.

### 3.2 Regions

The study addresses nearly all countries of Europe<sup>3</sup> (see Annex 3: "Country Reports"), however as stated above and mainly for reasons of avoiding superfluousness in cost calculation results, it has been decided that the main results will be presented per region.

#### **East versus West**

Although the "Iron Curtain" has already been down for some time now, major differences can still be noticed. Amongst others, between the (transport) cost levels in Western and Eastern Europe.

<sup>3</sup> EU27, Norway and Switzerland

### South versus North

A division can also be made in Northern and Southern countries. Especially the geographical barrier of the Alps and to a lesser extent the Pyrenees and the Balkans, form bottlenecks in the European road infrastructure and thus divide Europe horizontally.

Based on this, four regions have been distinguished. The countries Switzerland and Austria, have been addressed separately, as they are part of the geographical barrier itself and therefore do not fit well in one of the regions defined above.

- South-west region:  
France, Spain, Italy and Portugal.
- South-east region:  
Hungary, Bulgaria, Greece, Rumania, Cyprus, Malta and Slovenia.
- North-west region:  
Belgium, Germany, Denmark, Great Britannia, Ireland, Luxembourg, The Netherlands, Norway and Sweden.
- North-east region:  
Estonia, Latvia, Lithuania, Poland, Czech Republic, Slovakia and Finland.
- As single countries:  
Austria, Switzerland

## 3.3 Cost Calculation

### Preface

A cost calculation was made for four European regions, i.e. the South-west, South-east, North-west and North-east, and two single countries. This approach was chosen because the countries belonging to a certain region are comparable, where it concerns cost figures of (border crossing) road freight transport, with a few exceptions. The reasoning behind this is that the economic law of demand and supply defines that differences in (transport) costs levels between two neighbouring countries where all other factors are equal, tend to level out. A cost calculation at country level will then result in a lot of figures of neighbouring countries that show only very little variation.

Three sets of costs per tonne payload, for LGVs, L-HGVs and HGVs, were the actual result of this exercise. The cost calculation per region resulted finally in one of the following three ("Traffic Light") values:

- "RED" if the cost price of LGVs is substantially **lower** (more than 25%) than that of a L-HGV or a HGV.
- "ORANGE" if the cost price level of LGVs is comparable (within a 25% margin) with that of a L-HGV or a HGV.
- "GREEN" if the cost level is substantially **higher** (more than 25%) than that of a L-HGV or a HGV.

The threshold value of 25% relates to the fact that existing transport relations tend to have a certain "toughness". This means that in most transport sectors, except for sectors which are "governed" by a rock bottom price settings, the effects of cost price mutations affects only after substantial changes the



transport relation between a shipper and a haulier. Especially in sectors in which commodities of relatively high value per unit are transported, this threshold value could be close to 25%<sup>4</sup>.

### **Economic Activity**

In this study it has been assumed that international transport is driven by economic principles. In fact, road freight transport will be performed with vehicles with the lowest cost price per transported unit (tonnes, cubic metres, etc.). It is therefore also assumed that international road freight transport with LGVs only will take place if its cost price per transport unit is lower than or at least close to that of L-HGVs or HGVs. For the determination of the costs per unit standard calculation methods have been used.

### **Fixed Parameters**

The parameters concerning productivity were assumed fixed per vehicle type LGV, L-HGV and HGV. The main source of the actual values of these parameters were the benchmark studies that are performed by NEA every year. Although some level differences were been observed, it was also assumed that the vehicles were used in comparable trips and transport operations throughout Europe. Several productivity parameters were kept fixed for all four regions that were distinguished in Europe.

These parameters were (see also table 3.1 a/c):

- The new and residual value of the vehicle  
Although slight differences were observed between the actual new values of the freight vehicles, it was decided to use one overall average value. The main reason for this decision was the fact that the relatively slight differences have only a very small effect on the cost price per unit.  
The average value of new vehicles that was used in the calculations was:
  - LGVs: 30,000 euro (rest value: 4.500 euro)
  - L-HGVs: 48,000 euro (rest value: 4.800 euro)
  - HGVs: 120,000 euro (rest value: 12.000 euro)
- Expected (economic) lifetime  
Although freight vehicles may have a substantially longer technical lifetime, in the cost calculations the expected economic lifetime was used. This economic lifetime was determined by calculating the optimum of the costs of depreciation and the costs of repair and maintenance. The economic lifetimes used in the calculations were<sup>5</sup>:
  - LGVs: 3 years
  - L-HGVs: 4 years
  - HGVs: 7 years (power unit; semi-trailer: 12 years)
- The number of kilometres per year per vehicle.  
The annual kilometrage (mileage) was fixed at a level of 130.000 kilometres which was an observed average in long(er) distance international road freight transport.

<sup>4</sup> Source: NEA market observation 2010 and transport operators.

<sup>5</sup> Source: NEA market observation 2010 and transport operators.

- Fuel consumption

The value for fuel consumption was determined by taking an average of several vehicles. The fuel consumption figures that were used in the calculations are:

- LGVs: 1:10 l/km
- L-HGVs: 1:8 l/km
- HGVs: 1:3,1 l/km

- The number of hours in operation (productive hours)

One of the main cost determinants of the cost price of freight transport is labour costs of the driver. The main cost driver hereof is the number of annual operational hours of the vehicle per year (= productive hours). The number of hours in operation is partly related to the number of kilometres per year through the average driving speed. Compared with the L-HGVs and the HGVs the number of operational hours of LGVs is much lower because the actual driving speed of the latter is much higher (no speed limitation). In fact it takes far less time to perform a transport assignment when using a LGV instead of a L-HGV or a HGV. This conclusion leads to the fact that a *trip* with a LGV is much cheaper than a trip with one of the other vehicles. A second effect is related to the maximum number of operational hours of the freight vehicle per year. For all vehicle types that are used in international professional road freight transport, the observed limit<sup>6</sup> is a maximum of about 2,600 hours per year.

- Loading capacity

Per vehicle type LGV, L-HGV and HGV, an average (and commonly used) vehicle was defined. Of these vehicles the average loading capacity, both in tonnes and cubic metres, was determined. The following values were used:

- LGVs: 1,65 tonnes, 20 m<sup>3</sup>
- L-HGVs: 4,0 tonnes, 40 m<sup>3</sup>
- HGVs: 25 tonnes, 80 m<sup>3</sup>

- Utilisation of the loading capacity

It is illusionary to assume that the loading capacity of trucks will always be used to the maximum loading capacity. From past studies on the costs and productivity of international transport it appears that there is a strong relation between utilisation of loading capacity and trip distance. The utilisation factor (cargo volume/maximum loading capacity) ranges typically from 50% for shorter distances (single trip distance of 80 km and less) to about 80% for single trip distances of longer than 200 km. In this study we assume single trip distances that exceed this last threshold, e.g. 500 km.

- The number of trips per year

The number of trips per year can be calculated on the basis of the number of hours of operation and the single trip distance. The actual average number of trips was determined at a level of 240 trips per year for all three types of vehicles.

- Maintenance Costs

The maintenance costs consist of two main components:

- salaries of mechanics,
- parts and lubricants, etc.

The share distribution between these two components that was observed was 36% for the salaries and 64% for the component parts. Although the level of

<sup>6</sup> Source: NEA Freight Transport Market Monitoring 2010.

costs for repair and maintenance mutate substantially during the lifetime of a freight vehicle — a brand new vehicle has little repair and maintenance, nearly written off vehicles may have high costs — the actual cost level is represented by the average costs per kilometre during the lifetime. The actual cost levels of repair and maintenance were been derived from ongoing monitoring research of the road freight transport sector.

- Interest Rate

Financial means have been invested in the freight vehicles. The costs hereof, interest, were calculated with the help of the average interest rate of long-term loans which was set at a level of 5.5%.

**Table 3.1.a Fixed cost calculation parameters for LGVs**

	<b>Number</b>	<b>Unit</b>
New value	30,000	Euro
Residual value	4,500	Euro
Expected lifetime	3	Years
Kilometrage p/yr	130,000	Kms
Fuel consumption	0.1	(1:10)
Hours of operation <sup>')</sup>	1,704	Hours
Loading capacity	1.65	Ton
	20	m3
Cap utilisation	80	%
Number of trips	240	per year
Single trip distance	500	Kms
Maintenance:		
Salaries	36	%
Parts	64	%
Interest %	5.5	%

<sup>')</sup> Due to a much higher average driving speed (in kms/hour) it takes a LGV far less time to perform a certain transport assignment than a L-HGV or a HGV.

**Table 3.1.b Fixed cost calculation parameters for L-HGVs**

	<b>number</b>	<b>Unit</b>
New value	48,000	Euro
Residual value	4,800	Euro
Expected lifetime	4	Years
Kilometrage p/yr	130,000	Kms
Fuel consumption	0.125	(1:8)
Hours of operation	2,496	Hours
Loading capacity	4	Ton
	40	m <sup>3</sup>
Cap utilisation	80	%
Number of trips	240	per year
Single trip distance	500	kms
Maintenance:		
Salaries	36	%
Parts	64	%
Interest %	5.5	%

**Table 3.1.c Fixed cost calculation parameters for HGVs**

	<b>number</b>	<b>Unit</b>
New value	120,000	Euro
Residual value	12,000	Euro
Expected lifetime	7	Years
Kilometrage p/yr	130,000	Kms
Fuel consumption	0.323	(1:3,1)
Hours of operation	2,600	Hours
Loading capacity	25	Ton
	80	m <sup>3</sup>
Cap utilisation	80	%
Number of trips	500	Kms
Single trip distance	240	per year
Maintenance:		
Salaries	36	%
Parts	64	%
Interest %	5.5	%

### 3.4 Maximum Share of LGVs

#### Active Fleet of LGVs

Very few official sources on the actual active fleet of LGVs in Europe were found. Addressing this sparse data was further complicated by the fact that, in contrast to especially the HGVs and to a lesser degree also the L-HGVs, LGVs were used both in professional and own account transport operations. A additional complicating factor was been that the statistics were not entirely clear whether the LGVs were been fitted for freight transport or for the transport of persons.

A second challenge arised after the determination of the number relevant LGVs. In fact, as the determination of *the share* of LGVs in *the transport volume* was the main objective, information had to be retrieved on their "production". This production is defined by the number of trips and the average transported volume in tonnes and/or cubic meters. These figures are generally not available in official statistics.

### **TRANS-TOOLS**

The LGVs are at best a grey zone in European statistics. Also the official European transport modelling software TRANS-TOOLS assumes only one general vehicle type for road freight and does not distinguish between LGV and HGV. Therefore, in this study, the share of LGVs in bilateral road freight transport was based on the most recent freight flow figures from TRANS-TOOLS (2005). The actual shares were estimated with the help of the average product value per kilogram per commodity (see also table A3.1 of Annex 3).

### **Freight Flow Figures**

An alternative approach toward determining the (maximum) share of LGVs that are active in international transport was by using figures on freight flows which are readily available from Eurostat/TRANS-TOOLS. With a few simple economic principles it is possible to determine the fraction of these freight flows that possibly could also be transported by LGVs.

In order to be able to use general freight figures for the determination of the maximum share of LGVs in international transport a few assumptions must be made. The main assumption is the fact that transport is an activity driven by economic principles. This means that the value per kilogram of a certain freight volume has been the main determinant of the selection of a certain vehicle type, e.g. LGV, L-HGV or HGV. The economic rule states that, the lower that the fraction of the transport costs in the total product costs are, the less important the choice of the most cost-efficient freight vehicle will be.

Clear examples of the general rule concern transport assignments in which the actual cost price of the transport is only of very subordinate importance do exist. In these cases the transport costs are nearly negligible within the total product costs and thus not a driver for freight vehicle selection. Typical transport services that fall within this category are direct courier and express services of high valuables or documents with a high time pressure.

### **Upper limit**

With the indirect method on the basis of freight flows figures the upper limit of the share of LGVs in bilateral road freight transport was determined.

"Traffic Light" values were also used for the upper limit of the share of LGVs:

- "RED" if the upper limit of the share is above 6.5%,
- "ORANGE" if the upper limit falls between 6.5 and 3.5%,
- "GREEN" if the upper limit falls below 3.5%.

**Remarks:**

The overall upper limit of the share of LGVs in bilateral road freight transport in Europe is about 4.9%. Although no statement was made in this study on whether this level is substantial or not, it was clear that a country with a share well above this average could face more competition than other countries. The few data that were retrieved on international commercial freight transport by LGVs showed that the actual figures fall well below the threshold values listed above (see chapter 4: France, Norway and Netherlands).

### 3.5 Questionnaire

The third and last key element of the study on the share of LGVs was based on the results of a special questionnaire that was sent to representatives of the IRU and the Ministries of Transport of the countries of Europe.

The main topics in this questionnaire were:

- The existence of special legislation that particularly addresses international transport of goods by LGVs.
- The opinion of the respondents on whether LGVs are causing unfair competition in international freight transport.

For this third key element we will also use "traffic light" values:

- "RED" if on both topics mentioned above a clear "YES" was answered.
- "ORANGE" if one of the two topics had a clear "YES".
- "GREEN" if there is neither special legislation and the respondent stated that there is not a problem.

In total 28 questionnaires were returned; 17 were received from representatives of the Ministry of Transport (or a comparable organisation) and 11 from representatives of the national members of the IRU. From 8 countries no information was retrieved at all (see also table A2.1 in Annex 2).

In Annex 2 of this report the main results of the questionnaire have been listed. In the country reports (Annex 3) the full main results of the questionnaire have been presented.

### 3.6 Region: South-west Europe

**Overview**

The South-western (including the two "central" countries) region consists of the following countries: France, Spain, Italy and Portugal.

**Cost Calculation Results**

The total costs for a LGV were €0.51 per kilometre or €38.71 per hour (table 3.2.a), for a L-HGV €0.75 per kilometre or €38.84 per hour (table 3.2.b) and for a HGV: €1.22 per kilometre or €60.88 per hour (table 3.2.c).

**Table 3.2.a Cost calculation LGVs**

Depreciation	8,275
Fuel consumption	10,790
Salaries of drivers	30,929
Repairs and renewals	5,083
Interest of vehicle	1,041
Other costs	9,837
Total costs per year	65,955
<i>Per km</i>	<i>0.51</i>
<i>Per hour</i>	<i>38.71</i>
<i>Per tonne payload per trip</i>	<i>133.24</i>
<i>Per m<sup>3</sup> payload per trip<sup>1)</sup></i>	<i>10.99</i>

<sup>1)</sup> Maximum 400 kg

**Table 3.2.b Cost calculation L-HGVs**

Depreciation	10,471
Fuel consumption	13,488
Salaries of drivers	50,596
Repairs and renewals	6,354
Interest of vehicle	1,592
Other costs	14,454
Total costs per year	96,955
<i>Per km</i>	<i>0.75</i>
<i>Per hour</i>	<i>38.84</i>
<i>Per tonne payload per trip</i>	<i>80.80</i>
<i>Per m<sup>3</sup> payload per trip<sup>1)</sup></i>	<i>8.08</i>

<sup>1)</sup> Maximum 400 kg

**Table 3.2.c Cost calculation HGVs**

Depreciation	13,746
Fuel consumption	34,806
Salaries of drivers	66,974
Repairs and renewals	8,572
Interest of vehicle	3,768
Other costs	30,432
Total costs per year	158,299
<i>Per km</i>	<i>1.22</i>
<i>Per hour</i>	<i>60.88</i>
<i>Per tonne payload per trip</i>	<i>21.11</i>
<i>Per m<sup>3</sup> payload per trip</i>	<i>6.60</i>

**Table 3.3 Comparison of cost levels; costs per unit of maximum payload (tonne, m<sup>3</sup>) (2009)**

	<b>LGV</b>	<b>L-HGV</b>	<b>HGV</b>	<b>L-HGV/ LGV</b>	<b>HGV/ LGV</b>
per ton	€ 133.24	€ 80.80	€ 21.11	61%	16%
per m <sup>3</sup>	€ 10.99	€ 8.08	€ 6.60	74%	60%

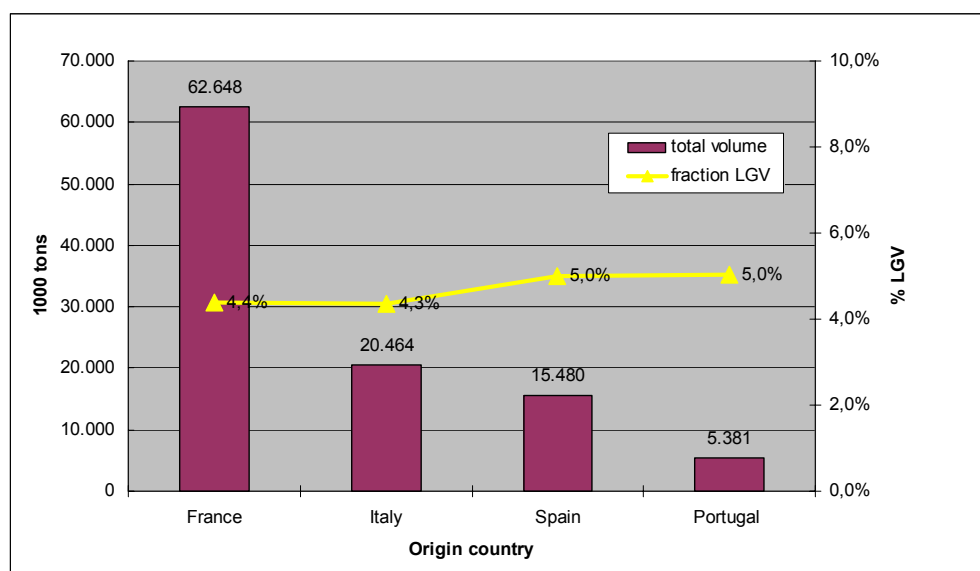
### Remark:

The cost price value for L-HGV in the transport of lightweight commodities is close to the margin of 25%. This is the threshold value between the cost levels of LGVs in relation to L-HGVs and/or HGVs. A slight drop in cost price of LGVs or a slight raise in cost price of L-HGVs or HGVs will cause the field colour to change from green to orange. This means that the values are close to the situation that there might be competition between LGVs and L-HGVs., On the basis of cost price per cubic meter and even more on the basis of tonnes, competition between LGVs and HGVs appears to be highly improbable.

### Share of Bilateral Road Freight Transport

Within this region Portugal and Spain showed the highest percentage of maximum share of freight flows that could be transported by LGVs. France had the largest bilateral goods flows with its neighbouring countries (see figure 3.1).

**Figure 3.1 Bilateral freight transports South-western region. (2005)**



### Results of the Questionnaire

Annex 2 presents the main results of the questionnaire. The full results of the questionnaire have been listed in the country reports (see Annex 3). Some highlights in relation to the questions 1, 8 and 9 in particular have also been listed in this section of the report.

#### France:

The questionnaire was returned by a representative of the Government. The person stated that there was no special legislation that applies only to LGVs (question 1). However, on the question of "unfair competition by LGVs" (question 8) the answer was affirmative for certain transport subsectors (".....des véhicules légers peut constituer dans certaines situations une concurrence déloyale pour le transport régulier de marchandises par poids lourds"). A possible action could be further harmonisation of legislation also for LGVs. However, such initiatives had undertaken before without much result. On top of this the actual share of LGVs used for freight transport were only about 1% of the total fleet of LGVs.



*Italy:*

In principle for the inland freight transport the same legislation that applies for HGVs also applies for (heavier) LGVs by Italian Law (Nr. 82-1153 and Nr 99-752; GVW above 1,5 tonnes). As international transport with LGVs is still seen as only marginal, no international harmonisation seems to be necessary. The questionnaire was filled in by the Italian IRU representative.

*Portugal:*

No results were retrieved.

*Spain:*

The association ASTIC responded that to their opinion in Spain commercial international freight transport by LGVs is neither seen as an actual problem nor is additional (international) legislation necessary.

**Table 3.3 Response to the legislation questionnaire South-western region**

Country	Respondents	Q1 yes	Q1 no	Q8 yes	Q8 no
France	Ministry		1	1	
Italy	IRU associate	1			1
Portugal	missing				
Spain	IRU associate		1		1
Total (excl missing) 3	3	1	2	1	2

**Conclusion for Southwest Europe**

International commercial road freight transport by LGVs in the South-west region seems to be close to the point that some problems might indeed emerge with potentially unfair competition. All four countries showed freight flows figures of which a substantial part could be transported by LGVs. At least two of the countries: France: "We see some relevant problems" and Italy: "We have special LGV-legislation", saw freight transport by LGVs as an issue.

**Table 3.4 Overall results region Southwest**

Country	Cost calculation	Maximum share	Legislation	Overall
France				
Italy				
Portugal			Missing	
Spain				
Total				

	There is with great certainty no problem.
	There might be a problem.
	There is almost certainly a problem.

### 3.7 Region: Southeast Europe

#### Overview

The South-eastern region consists of the following countries: Hungary, Bulgaria, Greece, Rumania, Cyprus, Malta and Slovenia.

#### Cost calculation results

The total costs for a LGV were €0.35 per kilometre or €26.63 per hour (table 3.5.a), for a L-HGV €0.49 per kilometre or €25.60 per hour (table 3.5.b) and for a HGV: €0.87 per kilometre or €43.34 per hour (table 3.5.c).

**Table 3.5.a Cost calculation LGVs**

Depreciation	8,275
Fuel consumption	10,205
Salaries of drivers	14,118
Repairs and renewals	4,129
Interest of vehicle	1,882
Other costs	6,768
Total costs per year	45,377
<i>Per km</i>	<i>0.35</i>
<i>Per hour</i>	<i>26.63</i>
<i>Per tonne payload per trip</i>	<i>91.67</i>
<i>Per m<sup>3</sup> payload per trip<sup>*)</sup></i>	<i>7.56</i>

<sup>\*)</sup> Maximum 400 kg

**Table 3.5.b Cost calculation L-HGVs**

Depreciation	10,471
Fuel consumption	12,756
Salaries of drivers	23,094
Repairs and renewals	5,162
Interest of vehicle	2,880
Other costs	9,524
Total costs per year	63,887
<i>Per km</i>	<i>0.49</i>
<i>Per hour</i>	<i>25.60</i>
<i>Per tonne payload per trip</i>	<i>53.24</i>
<i>Per m<sup>3</sup> payload per trip<sup>*)</sup></i>	<i>5.32</i>

<sup>\*)</sup> Maximum 400 kg

**Table 3.5.c Cost calculation HGVs**

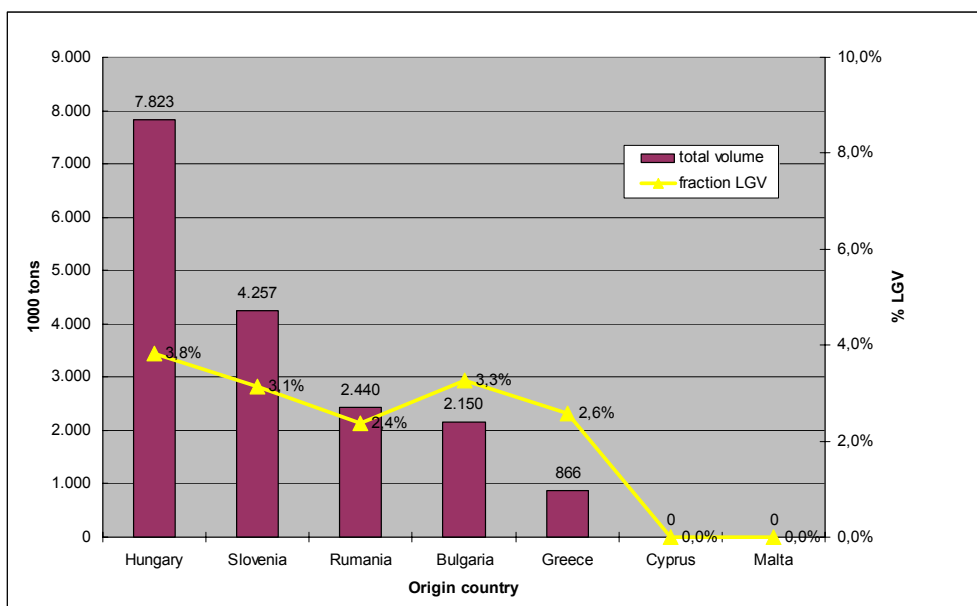
Depreciation	13,746
Fuel consumption	32,919
Salaries of drivers	30,570
Repairs and renewals	6,963
Interest of vehicle	6,815
Other costs	21,661
Total costs per year	112,675
<i>Per km</i>	<i>0.87</i>
<i>Per hour</i>	<i>43.34</i>
<i>Per tonne payload per trip</i>	<i>15.02</i>
<i>Per m<sup>3</sup> payload per trip</i>	<i>4.69</i>

**Table 3.6 Comparison of cost levels; cost price per unit of maximum payload (ton, m3) (2009)**

	LGV	L-HGV	HGV	L-HGV/ LGV	HGV/ LGV
per ton	91,67	53,24	15,02	58%	16%
per m <sup>3</sup>	7,56	5,32	4,69	70%	62%

**Share Bilateral Road Freight Transport**

Of the countries in the South-eastern region Hungary has by far the largest bilateral freight flow. The fraction of these freight flows that could eventually be transported by LGVs for these lies well below the European average of 4.9%. This means that the transport volume of high value and lightweight goods is fairly low.

**Figure 3.2 Bilateral freight transports South-eastern region. (2005)**

## **Results of the Questionnaire**

Annex 2 presents the main results of the questionnaire. The full results of the questionnaire have been listed in the country reports (see Annex 3). Some highlights in relation to the questions 1, 8 and 9 in particular are listed in this section of the report.

### *Bulgaria:*

Two questionnaires were returned from Bulgaria ; one from the MoT and one from the road haulier branch organisation AEBTRI. Both respondents agreed on the fact that there very little special legislation exists that addresses LGVs in particular. This legislation concerns only a certain form of road charging. However, the parties disagreed on whether LGVs were a problem in international commercial road freight transport in their country. The MoT did not see this as a serious issue, however AEBTRI stated that: "the international freight transport by LGVs causes unfair competition and should be regulated".

### *Cyprus:*

The representative of the Cyprus Ministry of Labour and Social Insurances stated that there is no special legislation addressing LGVs, and there is no need for additional legislation for LGVs.

### *Greece:*

The representative of the OFAE stated: "Only those vehicles that are over 3,5 tonnes have the right to carry out international transport. Therefore, the light vehicles are out of the game so to speak, when referring to international transport of goods".

### *Hungary:*

The National Transport Authority of Hungary considered it necessary to have special legislation for LGVs although it does not exist yet. They stated that this was necessary due to the fact that: "the infringements (speeding, exceeding daily driving times) committed by drivers/hauliers of LGVs represents an increasingly high percentage". Furthermore they regarded international freight transport by LGVs as a serious problem and additional legislation addressing LGVs should therefore be implemented.

### *Malta:*

No results were retrieved.

### *Romania:*

Both the representatives of the Romanian Ministry of Transport and Infrastructure and the branch organisation of road hauliers UNTRR returned the questionnaire. Although there is no special legislation for LGVs in Romania both representatives agreed that: "international freight transport by LGVs represents a serious issue that causes unfair competition". However, the parties did not agree whether additional action was considered necessary or not.

*Slovenia:*

The representative of the Slovenian MoT responded that in Slovenia there is no special legislation addressing LGVs in particular. With respect to international commercial road freight transport, the LGVs were not seen as a problem yet. However, it had been stated that this might change in the near future.

**Table 3.7 Response to the Legislation questionnaire South-eastern region**

Country	Respondents	Q1 yes	Q1 no	Q8 yes	Q8 no
Bulgaria	Ministry		1		1
Bulgaria	IRU associate		1	<b>1</b>	
Cyprus	Ministry		1		1
Greece	IRU associate		1		1
Hungary	Ministry		1	<b>1</b>	
Malta	Missing				
Romania	Ministry		1	<b>1</b>	
Romania	IRU associate		1		1
Slovenia	Ministry		1		1
Total (excl missing) 6	8	<b>0</b>	8	<b>3</b>	5

**Conclusion for South-east Europe**

Based on cost calculation and the maximum share determination it seemed that in most countries in the South-eastern region the issue of unfair competition by LGVs did not exist. However Bulgaria, Romania and Hungary responded in the questionnaire that some unfair competition was already visible and that additional (legislative) action should be undertaken.

**Table 3.8 Overall results region South-east**

Country	Cost Calculation	Maximum Share	Legislation	Overall
Bulgaria				
Cyprus				
Greece				
Hungary				
Malta			missing	
Romania				
Slovenia				
Total				

	There is with great certainty no problem.
	There might be a problem.
	There is almost certainly a problem.

### 3.8 Region: North-west Europe

#### Overview

The North-western region consists of the following countries: Belgium, Germany, Denmark, Great Britain, Ireland, Luxembourg, the Netherlands, Norway and Sweden.

#### Cost calculation results

The total costs for a LGV were €0.51 per kilometre or €38.93 per hour (table 3.9.a), for a L-HGV €0.75 per kilometre or €38.95 per hour (table 3.9.b) and for a HGV: €1.23 per kilometre or €61.54 per hour (table 3.9.c).

**Table 3.9.a Cost calculation LGVs**

Depreciation	8,275
Fuel consumption	11,678
Salaries of drivers	30,572
Repairs and renewals	5,063
Interest of vehicle	859
Other costs	9,895
Total costs per year	66,343
<i>Per km</i>	<i>0.51</i>
<i>Per hour</i>	<i>38.93</i>
<i>Per tonne payload per trip</i>	<i>134.03</i>
<i>Per m<sup>3</sup> payload per trip<sup>*)</sup></i>	<i>11.06</i>

<sup>\*)</sup> Maximum 400 kg

**Table 3.9.b Cost calculation L-HGVs**

Depreciation	10,471
Fuel consumption	14,598
Salaries of drivers	50,011
Repairs and renewals	6,329
Interest of vehicle	1,315
Other costs	14,493
Total costs per year	97,217
<i>Per km</i>	<i>0.75</i>
<i>Per hour</i>	<i>38.95</i>
<i>Per tonne payload per trip</i>	<i>81.01</i>
<i>Per m<sup>3</sup> payload per trip<sup>*)</sup></i>	<i>8.10</i>

<sup>\*)</sup> Maximum 400 kg

**Table 3.9.c Cost calculation HGVs**

Depreciation	13,746
Fuel consumption	37,637
Salaries of drivers	66,200
Repairs and renewals	8,538
Interest of vehicle	3,112
Other costs	30,768
Total costs per year	160,001
<i>Per km</i>	<i>1.23</i>
<i>Per hour</i>	<i>61.54</i>
<i>Per tonne payload per trip</i>	<i>21.33</i>
<i>Per m<sup>3</sup> payload per trip</i>	<i>6.67</i>

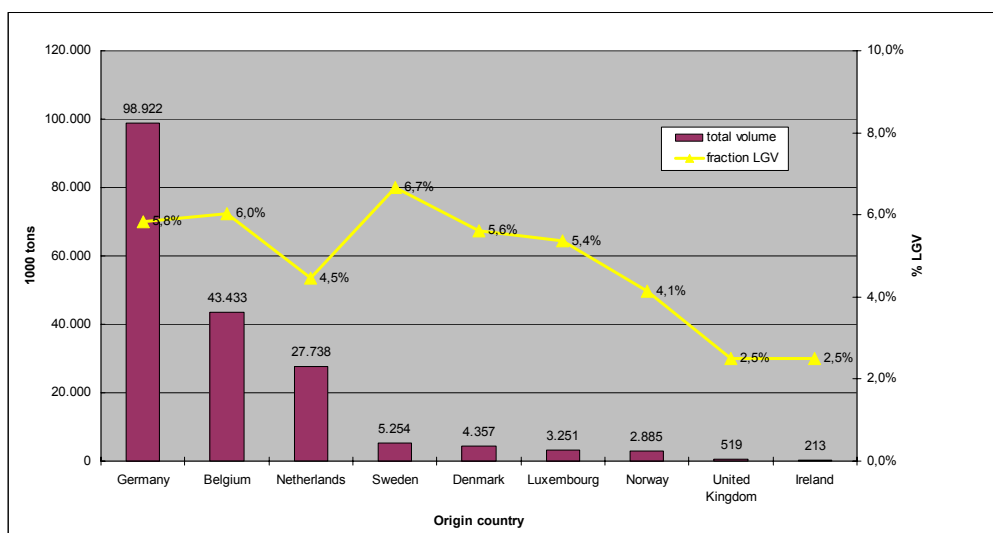
**Table 3.10 Comparison of cost levels; cost price per unit of maximum payload (ton, m<sup>3</sup>) (2009)**

	LGV	L-HGV	HGV	L-HGV/ LGV	HGV/ LGV
per ton	134.03	81.01	21.33	60%	16%
per m <sup>3</sup>	11.06	8.10	6.67	73%	60%

Remark: The cost price value for L-HGV in the transport of lightweight commodities is close to the margin of 25%.

### Share bilateral road freight transport

In North-west Europe large volumes of bilateral transport exists. The fraction of these volumes that could be transported by LGVs is particularly high for Sweden, and to a lesser degree also for Belgium and Germany.

**Figure 3.3 Bilateral freight transports North-western region (2005).**

## **Results of the questionnaire**

Annex 2 presents the main results of the questionnaire. The full main results of the questionnaire have been listed in the country reports (see Annex 3). Some highlights in relation to the questions 1, 8 and 9 in particular have been listed in this section of the report.

### *Belgium:*

Both the representatives of the governmental FOD "Mobiliteit en Vervoer" and of the branch organisation FEBETRA returned the questionnaire. Both representatives concluded that there is no special legislation addressing LGVs in particular, and both are of the opinion that there should be. The Ministry communicated that in the light of road safety; they see a growing number of accidents with LGVs possibly caused by extremely long driving times. On top of this the FEBETRA also concluded that, because of the strict driving time legislation of L-HGVs and HGVs, the (cost) advantages of operating LGVs show a further increase. Additional legislation addressing LGVs in particular could therefore be necessary.

### *Denmark:*

No results retrieved.

### *Germany:*

The branch organisation BGL concluded that the international commercial transport of freight with LGVs is still marginal and therefore no additional legislation is necessary.

### *Ireland:*

No results retrieved.

### *Luxembourg:*

The representative of the Ministry stated that international transport of freight by LGVs does not appear to be a problem for Luxembourg although clear information is missing.

### *The Netherlands:*

Both the representative of the MoT and the branch organisation TLN returned the questionnaire. No special legislation for LGVs exists in the Netherlands. Both organisations agreed on the fact that in most cases international commercial freight transport by LGVs did not cause substantial unfair competition with (long distance) freight transport by HGV. The representative of TLN even mentioned that freight transport by LGVs could be complementary to that of HGVs. In either case no additional legislation was considered necessary or even beneficial. A more promising approach could be the stimulation of self control regarding speed limitation and training, taking into account the exact local and regional circumstances.

### *Norway:*

No results retrieved.



*Sweden:*

The Swedish Transport Agency stated that in Sweden there is additional national driving time legislation which also applies for LGVs (Förordning 1994:1297). International freight transport by LGVs was neither seen as a problem nor was additional legislation considered necessary.

*United Kingdom:*

The UK Department for Transport, the Freight Transport Association (FTA) and the RHA returned the questionnaire. Special legislation exists for LGVs in the United Kingdom, amongst others, in the form of the "Domestic Drivers Hours Rules". All three organisations agreed that international freight transport with LGVs is not a serious problem. This fact relates to the strict domestic legislation which also applies for the inland part of an international trip. In turn this diminishes the cost advantages of LGVs in relation to L-HGVs and HGVs. They therefore also did not consider any additional legislation necessary in addition to their domestic legislation.

**Table 3.11 Response to the Legislation questionnaire North-western region.**

Country	Respondents	Q1 yes	Q1 no	Q8 yes	Q8 no
Belgium	Ministry		1	1	
Belgium	IRU associate		1	1	
Denmark	missing				
Germany	IRU associate		1		1
Ireland	missing				
Luxembourg	Ministry		1		1
Netherlands	Ministry		1		1
Netherlands	IRU associate		1		1
Norway	missing				
Sweden	Ministry	1			1
United Kingdom	Ministry		1		1
United Kingdom	IRU associate		1		1
United Kingdom	IRU associate		1		1
Total (excl.missing) 6	10	1	9	2	8

**Summary and conclusion**

The bilateral freight flows of high value and lightweight goods in this region are massive. Potentially, this opens the door to unfair competition by LGVs. However, although some figures were missing concerning special LGV legislation, only Belgium and Sweden saw a need for additional action. The overall picture still suggests that there is no substantial unfair competition caused by LGVs in this region.

**Table 3.12 Overall results region North-western region**

Country	Cost Calculation	Maximum share	Legislation	Overall
Belgium				
Denmark			missing	
Norway			missing	
Germany				
Ireland			missing	
Luxembourg				
Netherlands				
Sweden				
United Kingdom				
Total				

	There is with great certainty no problem.
	There might be a problem.
	There is almost certainly a problem.

### 3.9 Region: North-east Europe

#### Overview

The North-western region consists of the following countries: Estonia, Latvia, Lithuania, Poland, Czech Republic, Slovakia and Finland.

#### Cost Calculation Results

The total costs for a LGV were €0.37 per kilometre or €28.14 per hour (table 3.13a), for a L-HGV €0.52 per kilometre or €27.09 per hour (table 3.13.b) and for a HGV: €0.91 per kilometre or €45.69 per hour (table 3.13.c).

**Table 3.13.a Cost calculation LGVs**

Depreciation	8,275
Fuel consumption	11,353
Salaries of drivers	15,745
Repairs and renewals	4,222
Interest of vehicle	1,208
Other costs	7,153
Total costs per year	47,956
<i>Per km</i>	<i>0.37</i>
<i>Per hour</i>	<i>28.14</i>
<i>Per tonne payload per trip</i>	<i>96.88</i>
<i>Per m<sup>3</sup> payload per trip<sup>1)</sup></i>	<i>7.99</i>

<sup>1)</sup> Maximum 400 kg

**Table 3.13.b Cost calculation L-HGVs**

Depreciation	10,471
Fuel consumption	14,192
Salaries of drivers	25,756
Repairs and renewals	5,277
Interest of vehicle	1,848
Other costs	10,082
Total costs per year	67,626
<i>Per km</i>	<i>0.52</i>
<i>Per hour</i>	<i>27.09</i>
<i>Per tonne payload per trip</i>	<i>56.36</i>
<i>Per m<sup>3</sup> payload per trip<sup>1)</sup></i>	<i>5.64</i>

<sup>1)</sup> Maximum 400 kg

**Table 3.13.c Cost calculation HGVs**

Depreciation	13,746
Fuel consumption	36,624
Salaries of drivers	34,094
Repairs and renewals	7,119
Interest of vehicle	4,374
Other costs	22,838
Total costs per year	118,795
<i>Per km</i>	<i>0.91</i>
<i>Per hour</i>	<i>45.69</i>
<i>Per tonne payload per trip</i>	<i>15.84</i>
<i>Per m<sup>3</sup> payload per trip</i>	<i>4.95</i>

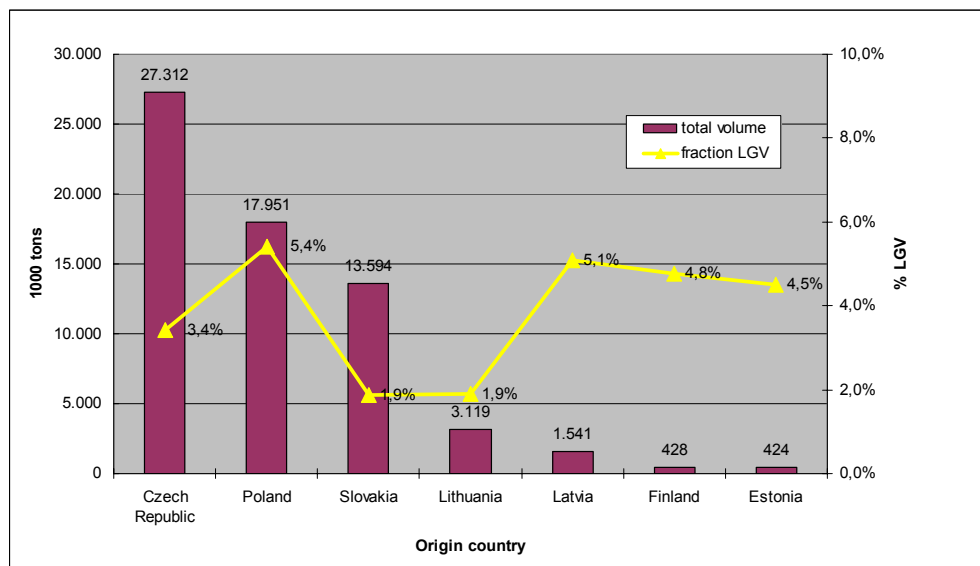
**Table 3.14 Comparison of cost levels; cost price per unit of maximum payload (ton, m<sup>3</sup>) (North-eastern region; 2009)**

	<b>LGV</b>	<b>L-HGV</b>	<b>HGV</b>	<b>L-HGV/ LGV</b>	<b>HGV/ LGV</b>
per ton	96.88	56.36	15.84	58%	16%
per m <sup>3</sup>	7.99	5.64	4.95	71%	62%

### Share Bilateral Road Freight Transport

The country with the largest bilateral freight flows is the Czech Republic followed by Poland and Slovakia. However, except for Poland, these flows are characterised by relatively low values per unit and/or by high weights. These commodities are generally transported with the largest HGVs available and therefore do not face any competition from LGVs at all.

**Figure 3.4 Bilateral freight transports North-eastern region (2005)**



### Results of the Questionnaire

Annex 2 presents the main results of the questionnaire. The full results of the questionnaire have been listed in the country reports (see Annex 3). Some highlights in relation to the questions 1, 8 and 9 in particular have also been listed in this section of the report.

#### *Czech Republic:*

The representative of the MoT stated that there is no specific legislation addressing LGVs in this country. It has also been stated that: "As such vehicles do not present such a jeopardy for road safety,..., we don't feel the necessity to produce additional legislation on this issue". The MoT also did not expect that (international) transport with LGVs would seriously distort competition.

#### *Estonia*

Both the representatives of the MoEA (Road and Railways Department) and the ERAA communicated that no special LGV-legislation is in force in Estonia. LGVs neither caused unfair competition in international transport, nor was additional legislation considered necessary.

#### *Finland*

No information was retrieved.

#### *Latvia*

The Road Transport Administration of Latvia stated that there was no special LGV legislation. LGVs neither caused unfair competition in international transport, nor was additional legislation considered necessary.

#### *Lithuania*

No information has been retrieved from this country.

### Poland

The questionnaires were returned by representatives of the General Inspectorate of Road Transport and the ZMPD. It was stated that no special legislation for LGVs exists. However, their opinion on unfair competition by LGVs was: "It might have significant influence on unfair competition, ..., but do not dispose over any statistics to prove it". Additional information should therefore be collected before any action could be taken.

### Slovakia

The representative of the MoT of Slovakia responded that there was no special legislation addressing LGVs in the country. At the moment unfair competition by LGVs was not an issue and no additional legislation seemed to be necessary.

**Table 3.15 Response to the Legislation questionnaire North-eastern region.**

Country	Respondents	Q1 yes	Q1 no	Q8 yes	Q8 no
Czech republic	Ministry		1		1
Estonia	Ministry		1		1
Estonia	IRU associate		1		1
Finland	missing				
Latvia	Ministry		1		1
Lithuania	missing				
Poland	Ministry		1	1	
Poland	IRU associate		1		1
Portugal	missing				
Slovakia	Ministry		1		1
Total (excl.missing) 5	7	0	7	1	6

### Conclusion for the North-eastern region

Although several countries showed figures on bilateral freight flows that could be open for transport with LGVs, only Poland suggested that unfair competition by LGVs might exist. However, there was no statistical proof hereof.

**Table 3.16 Overall results region North-eastern region**

Country	Cost Calculation	Maximum share	Legislation	Overall
Czech republic				
Estonia				
Finland			missing	
Latvia				
Lithuania			missing	
Poland				
Slovakia				
Total				

	There is with great certainty no problem.
	There might be a problem.
	There is almost certainly a problem.

### 3.10 Austria and Switzerland

#### Cost Calculation Results

##### *Austria:*

The total costs for a LGV were €0.52 per kilometre or €39.99 per hour (table 3.17.a), for a L-HGV €0.77 per kilometre or €40.29 per hour (table 3.17.b) and for a HGV: €1.25 per kilometre or €62.67 per hour (table 3.17.c).

##### *Switzerland:*

The total costs for a LGV are €0.54 per kilometre or €40.97 per hour (table 3.17.a), for a L-HGV €0.79 per kilometre or €41.21 per hour (table 3.17.b) and for a HGV: €1.29 per kilometre or €64.73 per hour (table 3.17.c).

**Table 3.17.a Cost calculation LGVs**

	<b>Austria</b>	<b>Switzerland</b>
Depreciation	8,275	8,275
Fuel consumption	10,660	11,570
Salaries of drivers	32,886	33,183
Repairs and renewals	5,194	5,211
Interest of vehicle	969	1,166
Other costs	10,165	10,414
Total costs per year	68,149	69,819
<i>Per km</i>	<i>0.52</i>	<i>0.54</i>
<i>Per hour</i>	<i>39.99</i>	<i>40.97</i>
<i>Per tonne payload per trip</i>	<i>137.68</i>	<i>141.05</i>
<i>Per m<sup>3</sup> payload per trip<sup>*)</sup></i>	<i>11.36</i>	<i>11.64</i>

<sup>\*)</sup> Maximum 400 kg

**Table 3.17.b Cost calculation L-HGVs**

	<b>Austria</b>	<b>Switzerland</b>
Depreciation	10,471	10,471
Fuel consumption	13,325	14,463
Salaries of drivers	53,797	54,283
Repairs and renewals	6,493	6,514
Interest of vehicle	1,483	1,784
Other costs	15,000	15,341
Total costs per year	100,569	102,856
<i>Per km</i>	<i>0.77</i>	<i>0.79</i>
<i>Per hour</i>	<i>40.29</i>	<i>41.21</i>
<i>Per tonne payload per trip</i>	<i>83.81</i>	<i>85.71</i>
<i>Per m<sup>3</sup> payload per trip<sup>*)</sup></i>	<i>8.38</i>	<i>8.57</i>

<sup>\*)</sup> Maximum 400 kg

**Table 3.17.c Cost calculation HGVs**

	<b>Austria</b>	<b>Switzerland</b>
Depreciation	13,746	13,746
Fuel consumption	34,387	37,323
Salaries of drivers	71,212	71,855
Repairs and renewals	8,760	8,788
Interest of vehicle	3,509	4,222
Other costs	31,324	32,352
Total costs per year	162,937	168,285
<i>Per km</i>	<i>1.25</i>	<i>1.29</i>
<i>Per hour</i>	<i>62.67</i>	<i>64.73</i>
<i>Per tonne payload per trip</i>	<i>21.72</i>	<i>22.44</i>
<i>Per m<sup>3</sup> payload per trip</i>	<i>6.79</i>	<i>7.01</i>

**Table 3.18.a Austria: Comparison of cost levels; costs per unit of maximum payload (ton, m3) (2009)**

	<b>LGV</b>	<b>L-HGV</b>	<b>HGV</b>	<b>L-HGV/ LGV</b>	<b>HGV/ LGV</b>
per ton	€ 137.68	€ 83.81	€ 21.72	61%	16%
per m <sup>3</sup>	€ 11.36	€ 8.38	€ 6.79	74%	60%

**Remark:**

The cost price value for L-HGV in the transport of lightweight commodities is close to the margin of 25%. This is the threshold value between the cost levels of LGVs in relation to L-HGVs and/or HGVs. A slight drop in cost price of LGVs or a slight raise in cost price of L-HGVs or HGVs will cause the field colour to change from green to orange. This means that the values come close to the situation that there might be competition between LGVs and L-HGVs. Competition between LGVs and HGVs appears to be highly improbable, on the basis of cost price per cubic meter and even more on the basis of tonnes.

**Table 3.18.b Switzerland: Comparison of cost levels; costs per unit of maximum payload (ton, m3) (2009)**

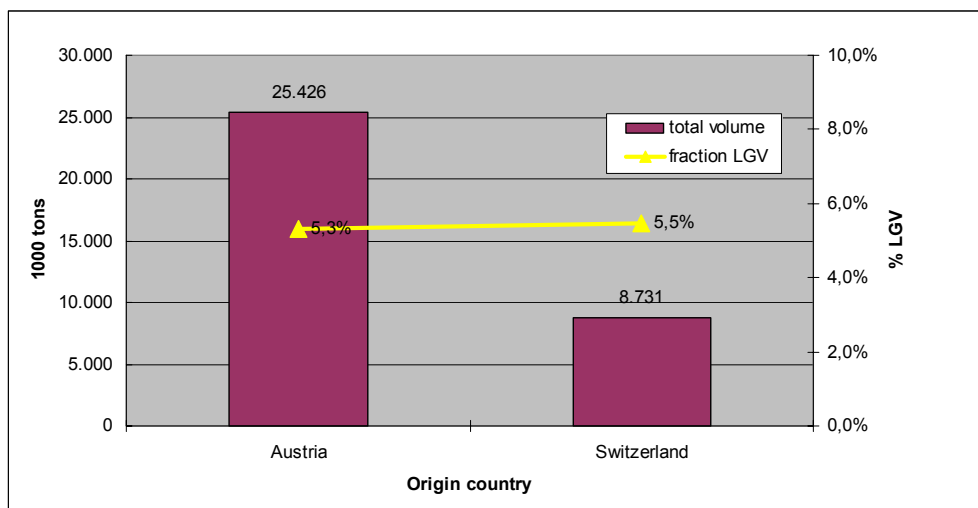
	<b>LGV</b>	<b>L-HGV</b>	<b>HGV</b>	<b>L-HGV/ LGV</b>	<b>HGV/ LGV</b>
per ton	€ 141.05	€ 85.71	€ 22.44	61%	16%
per m <sup>3</sup>	€ 11.64	€ 8.57	€ 7.01	74%	60%

Remark: see above

### Share Bilateral Road Freight Transport

Compared to Austria the bilateral freight flows between Switzerland and its neighbours is fairly low. The fraction of the flows that might be transported by LGVs is well above the average of 4.9% for Europe.

**Figure 3.5 Bilateral freight transports: Austria and Switzerland.(2005)**



### Results of the Questionnaire

#### *Austria:*

No special legislation addressing LGVs exists in Austria. However, the following highly relevant remarks were made on the question whether LGVs cause unfair competition,:

"There are a couple of arguments to consider:

- 1 These vehicles are highly motorised, able to exceed legal speed limits on highways by far. Accident numbers indicate that this is not only possible, but is also practically done by the drivers of these vehicles, which creates a serious road safety problem in at least some European countries.
- 2 LGV are frequently downsized to 3,500 kg. Hence, their technical capacity is much higher, which encourages breaches in terms of exceeding the legal limit for payload.
- 3 Personal costs are a major issue and still far lower in the eastern parts of the European Union and beyond its borders. This leads to a lack of particular rules for LGVs (like weekend ban, night time driving regulations, etc) and form an invitation to divide larger loads to small pieces and ship them over the weekend with much higher speed. This results in additional risk to the drivers of these vehicles and other road users.
- 4 LGV are excluded from toll regulations that depend on mileage. Hence, the principle of "pay as you drive", which is applied for HGVs, is corrupted by the use of LGVs instead.
- 5 It is possible that drivers who drive HGVs during the week, continue to work over the weekend with uncontrolled LGVs. This endangers the purpose of limiting driving and resting times. Hence, competition is unfair between companies that encourage their drivers to do so, compared to companies that respect the purpose driving and resting hours restrictions.



Hence, LGV traffic — if they are operated as an alternative for HGV to avoid restrictions in terms of driving and resting hours and to avoid road toll — have to be considered an issue of unfair competition. "

On the question whether additional legislation for LGVs should be considered, the following remarks were made:

"There are two issues:

- 1 On the one hand, measures need to be taken in order to avoid LGV traffic as a replacement for HGV, if this is done with the intention to avoid regulations for driving and resting times as well as to avoid road toll. In principle, all other transport than the exception already existing for HGV, could be applied to commercial LGV transport as well.
- 2 On the other hand, vehicle measures should be implemented to avoid the additional risk exerted by LGVs. Speed limiters have been under discussion already. But there is also a large need for the enforcement of existing rules. In particular compliance to speed limits and weight limits are important.

Measures should be taken to deter infringement of driving and resting time regulations. For the sake of the drivers' health and road safety.

Free traffic of LGV also alleviates bricolage. However, non-commercial transport should not be cumbered."

**Table 3.19 Response to the Legislation questionnaire: Austria and Switzerland.**

Country	Respondents	Q1 yes	Q1 no	Q8 Yes	Q8 no
Austria	Ministry	1		1	
Switzerland	missing				

### Conclusion for Austria and Switzerland

The maximum share of LGVs in the freight flows suggested that especially Austria could be faced with unfair competition by LGVs. This indication was confirmed by the results of the questionnaire in which it was also stated that additional action should be undertaken.

**Table 3.20 Overall results: Austria and Switzerland**

Country	Cost calculation	Maximum Share	Legislation	Overall
Austria				
Switzerland			Missing	
Total				

	There is with great certainty no problem.
	There might be a problem.
	There is almost certainly a problem.

### 3.11 Special legislation for LGVs

The answer on three questions of the questionnaire provided insight in the felt urgency for addressing LGVs in international road freight transport. The first question was ("Q1"; see also annex 2 and 3):

"Does your country have a specific policy and legislation to address international transport of goods by LGVs?".

In total three questionnaires were returned stating that such legislation exists (see table 3.21). These countries were: Austria, Italy and Sweden.

The second question was ("Q8"):

"Do you regard international freight transport by LGVs as a serious issue e.g. causing unfair competition?".

In total eight questionnaires from seven countries were returned stating that international transport by LGVs causes unfair competition.

The third question was ("Q9"):

"Do you consider additional action (legislation) necessary to address the issue of LGVs?".

All eight respondents that stated that LGVs were an issue in international transport stated also that, to their opinion, additional legislation would be necessary.

**Table 3.21 Special legislation for LGVs**

Country	Respondents	Q1 yes	Q1 no	Q8 yes	Q8 no	Q9 yes	Q9 no
Austria	Ministry	1		1		1	
Belgium	Ministry		1	1		1	
Belgium	IRU associate		1	1		1	
Bulgaria	IRU associate		1	1		1	
France	Ministry		1	1		1	
Hungary	Ministry		1	1		1	
Italy	IRU associate	1			1		1
Poland	Ministry		1	1		1	
Romania	Ministry		1	1		1	
Sweden	Ministry	1			1		1
Total (9)		3	7	8	2	8	2

Note: a double count exists in this table for Belgium as for this country two relevant questionnaires, one from the Ministry and the other from a professional association, were returned.

## 4 Statistical data collection

### 4.1 European level statistics

#### Eurostat Figures

From the start of this project it was clear that the level of detail that was necessary for this study was not maintained in the Eurostat figures. However, in Annex 1 several more or less related figures have been presented per country. These figures address the number of active goods vehicles as a total and if available, also as a subdivision into three categories. Although the lowest category, less than 3 tonnes maximum loading capacity included the types of LGVs which were the object of this study, in chapter two information was shown that indicates that these LGVs were just a small but unknown fraction hereof and the actual value might vary per country (see table 4.1).

**Table 4.1 Active goods vehicle fleet in Europe**

Country	< 3 tonne MLC	3-7 tonne MLC	>7 MLC	total	year
Austria	306,000	14,000	34,000	354,000	2007
Belgium	n.a.	n.a.	n.a.	642,687	2007
Cyprus	107,398	5,127	4,272	116,797	2004
Czech Rep,	456,657	33,393	43,966	533,916	2007
Denmark	359,118	9,662	20,582	389,362	2001
Estonia	51,926	8,220	20,134	80,280	2007
Finland	333,181	12,150	45,199	390,530	2007
France	5,095,473	116,559	205,471	5,417,503	2004
Germany	1,988,119	153,379	181,566	2,323,064	2007
Greece	815,235	45,135	48,085	906,455	2002
Hungary	352,198	42,932	14,851	418,360	2005
Ireland	n.a.	n.a.	n.a.	268,082	2003
Italy	1,958,812	246,357	1,863,866	4,069,035	2001
Latvia	68,427	28,289	16,512	113,228	2007
Lithuania	66,784	37,206	22,517	126,507	2007
Luxembourg	16,499	1,640	3,591	21,730	2000
Malta	10,192	25,685	6,734	42,615	2001
Netherlands	906,582	17,696	46,305	970,583	2003
Norway	462,371	10,408	32,880	462,371	2007
Poland	1,979,255	214,049	151,754	2,345,068	2007
Portugal	1,481,877	68,303	278,977	1,829,158	2001
Romania	n.a.	n.a.	n.a.	467,280	2007
Slovak Rep.	n.a.	n.a.	n.a.	163,067	2003
Slovenia	53,311	5,224	10,356	68,888	2007
Spain	3,783,395	126,911	299,907	4,210,213	2004
Sweden	435,241	12,987	47,433	495,661	2007
Switzerland	257,197	10,385	29,506	297,088	2004
United Kingdom	2,460,000	90,000	50,000	2,600,000	2007

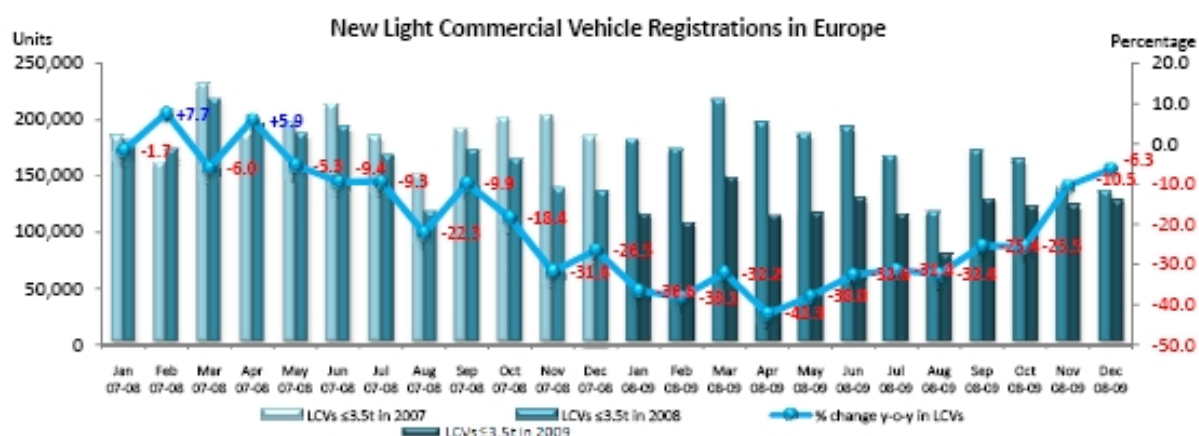
Source: Eurostat

### ACEA Data

Apart from Eurostat another important source of vehicle related data was the ACEA<sup>7</sup>. However, figures on production and new registrations (see figure 4.1) could only be of indirect importance for this study because nothing was known about their (future) daily operations. An example could explain this statement. In principle a vehicle could operate day and night for 365 days per year. However, the actual number of days of operations of a freight vehicle might show a large range, starting from about 20 days for very specialized trucks to about 300 days for scheduled container transport. As costs were calculated per kilometre or hour the cost figures of both types of transport were totally incomparable. Also the determination of shares of LGVs active in international transport, which was one of the objectives of this study, had to be quantified by the number of trips, on the sole basis of new registrations this exercise might not be possible.

However, under a few strict assumptions concerning economic lifetime (3 years) and number of hours in operation per year (1,700 hours; see cost calculation ), these figures could be used to crosscheck other figures.

**Figure 4.1 ACEA figures on new registrations of LGVs**



Source: ACEA website

### ANFAC-Data

The ANFAC<sup>8</sup> report "European Motor Vehicle Parc 2007" contained figures on light commercial vehicles that are in use (see table 4.2). However, the same problem arised as with the Eurostat figures, the actual operation of these LGVs was not known. Thus these figures were not well suited to this study.

<sup>7</sup> ACEA= European Automobile Manufacturers' Association

<sup>8</sup> ANFAC= Asociación Española de Fabricantes de Automóviles y Camiones

**Table 4.2 ANFAC figures on active fleet of light commercial vehicles in use  
≤ 3,5 tonne**

2.		LIGHT COMMERCIAL VEHICLES IN USE <= 3,5 TON.						
	2002	2003	2004	2005	2006	2007	% growth 07/06	
AUSTRIA	260.683	267.466	275.207	282.068	289.354	297.888	2,9	
BELGIUM	436.624	456.164	482.176	506.644	523.161	543.118	3,8	
DENMARK	353.296	364.813	388.695	421.047	458.968	485.633	5,8	
FINLAND	244.299	247.139	269.586	273.278	281.407	294.196	4,5	
FRANCE	5.338.000	5.418.000	5.488.000	5.549.000	5.609.000	5.680.000	1,3	
GERMANY	2.323.854	2.330.197	2.348.399	2.015.831	2.055.188	1.861.281	-9,4	
GREAT BRITAIN	2.842.537	2.918.713	3.038.866	3.152.455	3.325.625	3.443.959	3,6	
GREECE	686.725	696.466	715.030	730.666	747.585	720.298	-3,7	
IRELAND	200.234	217.380	233.275	250.067	279.257	304.841	9,2	
ITALY	2.980.322	3.145.283	3.100.520	3.257.525	3.401.960	3.587.552	5,5	
NETHERLANDS	797.000	836.000	892.000	885.000	888.000	921.000	3,7	
PORTUGAL	1.097.000	1.119.000	1.150.000	1.170.000	1.184.000	1.198.000	1,2	
SPAIN	3.851.192	3.945.937	4.166.810	4.396.880	n.a.	4.866.277	-	
SWEDEN	332.777	346.405	364.505	384.776	401.111	423.920	5,7	
EU-15 **	21.744.543	22.308.963	22.913.069	23.275.237	19.444.616	24.627.963	26,7	
CZECH REPUBLIC	221.154	239.927	269.521	310.280	359.353	422.520	17,6	
ESTONIA								
HUNGARY								
LATVIA	33.744	35.826	38.070	41.536	46.233	51.970	12,4	
LITHUANIA								
POLAND		1.706.379	1.775.221	1.717.435	1.758.293	1.824.650	3,8	
SLOVAKIA						154.699	-	
SLOVENIA								
EU-23 **	21.999.441	24.291.095	24.995.881	25.344.488	21.608.495	27.081.802	25,3	
BULGARIA								
ROMANIA								
TURKEY	1.117.081	1.218.851	1.578.821	1.813.596	2.053.147	2.263.060	10,2	
TOTAL PAISES **	23.116.522	25.509.946	26.574.702	27.158.084	23.661.642	29.344.862	24,0	

\*\*.- For available data

Remark: Some of the substantial differences between figures presented by the ANFAC and those presented by Eurostat can be explained by the fact that not all figures of the latter refers to the year 2007. The explanation of the remaining differences was outside the scope of this study.

## 4.2 Country Level Statistics

At country level, Great Britain, Norway, France and the Netherlands seemed to be more active concerning data collection on daily operations of LGVs.

*Great Britain*

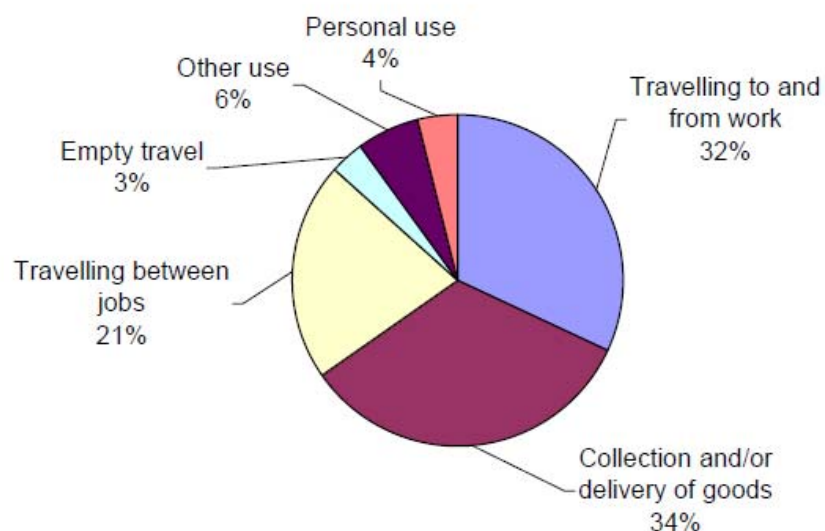
The most recent report on the activity of vans in Great Britain concerned the years 2003-2005. Chart 4.1 (see below) of this report showed clearly that most vans were used for typical own account transport jobs such as travelling between jobs (craftsmen; 21%) and travelling to and from work (craftsmen; 32%). The collection and delivery of goods, with 34%, came first. This activity could be international commercial transport of goods.

However, chart 4.7 (see below) of the same document showed that 84% of all transport with vans stays within the Government Office Region and thus within Great Britain.

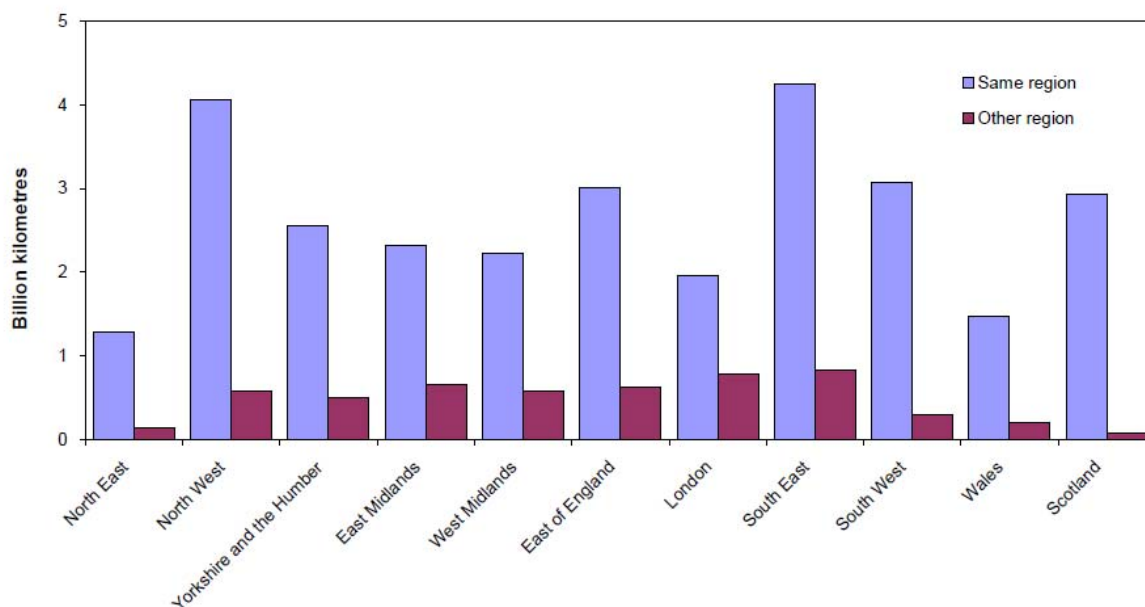
The report did not distinguish between interregional and international transport, and thus no conclusions could be made on the use of vans in international transport but for the fact that its share could be 16% at the absolute maximum.

**Figure 4.2 Charts 4.1 and 4.7**

**Chart 4.1: Company owned vans: Vehicle kilometres by reason for use: Annual Average 2003 - 2005**



**Chart 4.7: Company owned vans: Estimated vehicle kilometres by origin and destination Government Office Region: Annual Average 2003 - 2005**



### *France*

In principle every 5 years the France national statistical institute CNIS<sup>9</sup> monitors the numbers and use of (commercial) vans by way of a special questionnaire<sup>10</sup> (see annex 4). The owners of the vans are obliged to fill in this VUL-questionnaire<sup>11</sup>.

The most recent statistical investigation had taken place in 2006 and addressed all commercial vans with a total vehicle weight of 3,5 tonnes or less.

The following figures had been collected (amongst others):

- Number of active vehicles
- The main utilisation
- Number of kilometres per trip and per year
- Type of fuel
- Fuel consumption per kilometre
- Utilization (professional or not) of the vehicle
- Full characteristics of trips on two working days within the week of 20-26 March 2006

On base of this questionnaire the following relevant statistics on LGVs had become available for France for the year 2006:

- Number of active vans with a Gross Vehicle Weight of 3,5 tonnes or less (see table 4.3).
- The use of the vehicle (see figure 4.3).
- The mileage per year per economic sector (see figure 4.4).

Although this questionnaire, and thus also the information derived from this form, was restricted to an once in the five year snapshot and, especially concerning the two-day trip specifics, only addresses sample data, with proper statistical techniques the main outline of the utilisation of LGVs should become clear.

Thus, with the help of the results of this VUL-questionnaire, in principle the main question of this study ("Are LGVs causing unfair competition in international transport?") could be answered for France. Although not analysed in detail, the average mileages of LGVs in the transport sector of more than 30.000 kilometres at least suggested some share for international freight trips especially in border regions. With an in-depth analysis of the collected trip data it should be possible to determine the actual share hereof. If one assumed that all LGVs that were used in the sector transport, had been used in "for hire and reward" activities, still its share did not exceed 4% of the total number of relevant vehicles. In practice the actual share of these LGVs would even be only a fraction hereof.

However, as it seemed that France was only one of the very few countries that collects data on LGVs with a special questionnaire, this method would not help to answer the main question of the study on the European scale. It was therefore also decided that a further in-depth study of the France data was outside of the scope of this study.

<sup>9</sup> Conseil National de l'Information Statistique

<sup>10</sup> Enquête sur l'utilisation en 2005-2006 des véhicules utilitaires légers ("VUL")

<sup>11</sup> This questionnaire is therefore comparable with the one which is mandatory for the commercial heavier vehicles.



**Table 4.3 Number of LGVs in France  
(in thousands)**

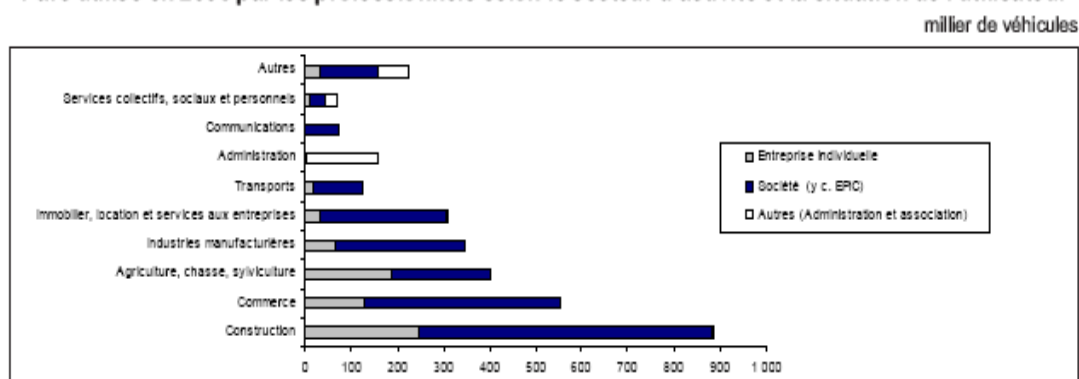
**Évolution du parc en service selon la classe de PTAC**

Classes de PTAC (en tonnes)	01/01/92	01/01/97	01/01/01	01/01/06	millier de véhicules et %		
					En moyenne annuelle		
					97/92	01/97	06/01
Moins de 1,5 t	2 206	2 296	2 019	1 349	0,8	-3,2	-7,8
1,5 t à 2,5 t	934	1 338	1 734	2 564	7,5	6,7	8,1
2,6 t à 3,4 t	562	462	671	917	-3,8	9,8	6,5
3,5 t	446	535	561	669	3,7	1,2	3,6
<b>Total</b>	<b>4 148</b>	<b>4 631</b>	<b>4 985</b>	<b>5 499</b>	<b>2,3</b>	<b>1,9</b>	<b>1,9</b>

Source : MEEDDAT/SESP, enquêtes VUL

**Figure 4.3 Use of LGVs on base of economic sectors  
(in thousands)**

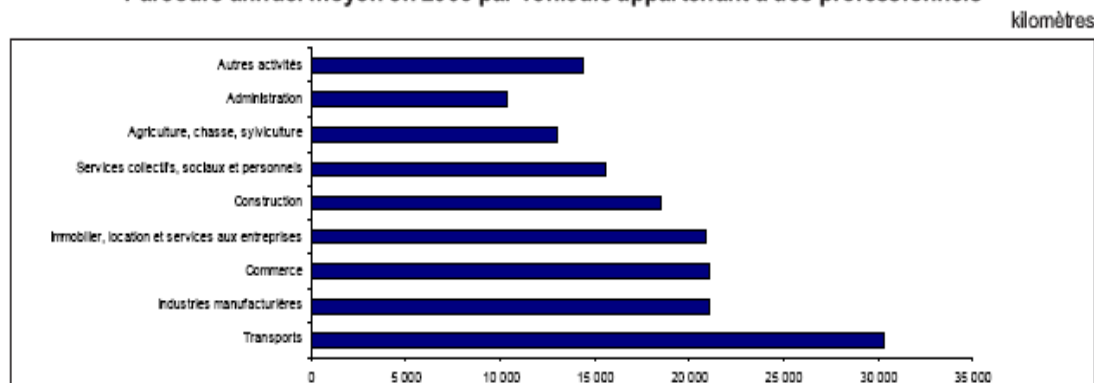
**Parc utilisé en 2006 par les professionnels selon le secteur d'activité et la situation de l'utilisateur**



Source : MEEDDAT/SESP, enquête VUL

**Figure 4.4 Yearly mileage of LGVs per economic sector**

**Parcours annuel moyen en 2006 par véhicule appartenant à des professionnels**



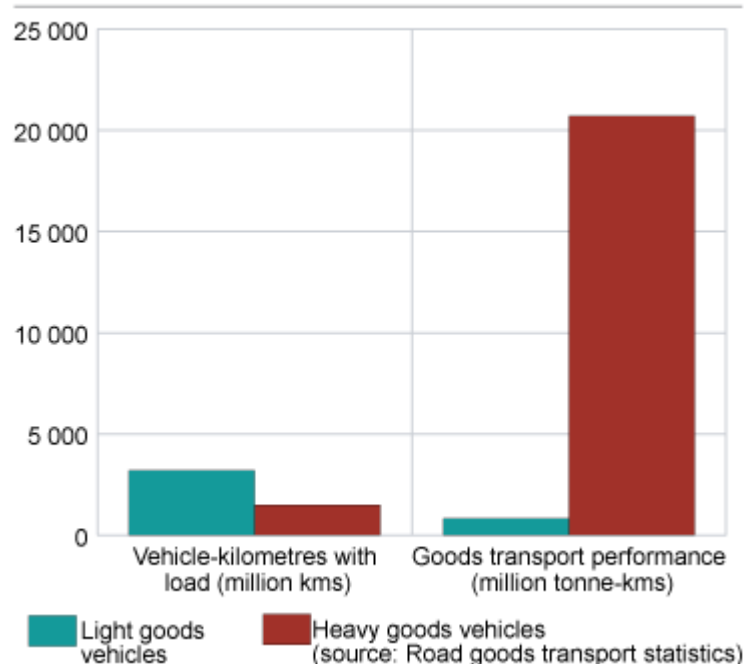
Source : MEEDDAT/SESP, enquête VUL

### Norway

The Central Statistical Bureau of Norway ("Statistisk sentralbyrå") presented some figures on LGVs that had been used in transport activities in the year 2008. They stated that: "Transport by vans and small lorries has increased substantially in Norway in the last five years. However, the goods that were carried by light goods vehicles amounted to only a small share of the total roads goods transport in 2008". The total tonnage carried by this type of vehicles amounts only about 6%. (see figure 4.5). They concluded for transport by vans and small lorries: "High mileage, little cargo".

**Figure 4.5**

### Transport by light goods vehicles and heavy goods vehicles. 2008



2009 © Statistics Norway

The tables 4.4 and 4.5 show the values of several performance indicators of LGVs in Norway. It is clear to see that the share of "hire or reward" commercial road freight transport activities with vans and small lorries is just a fraction, 7,9%, of the total number of vehicle kilometres performed with this type of vehicles. Although the figure is somewhat higher in case this share is measured in goods performance (tonne-kms) the share of own account transport activities is still above 70%.

On base of the figures presented in table 4.6 the share of international transport ("Utenfor Norge") could be determined. This share ("hire and reward" and "own account" combined) was less than 1% of the transport performance in vehicle-kilometres.

**Table 4.4**

**1 Transport by vans and small lorries, by type of vehicle. 2008**

	Vehicle-kilometres		Tonnage carried	Goods transport performance	Number of laden journeys
	Total	Laden journeys			
Type of vehicle					
	<i>Millions</i>		<i>Million tonnes</i>	<i>Million tonne-kms</i>	<i>Millions</i>
All vans and small lorries	7 604.9	3 200.6	18.2	836.3	97.7
Small lorries	474.6	274.2	4.1	198.8	6.4
Small combined vehicles	733.3	115.0	0.5	19.6	3.8
Large combined vehicles	175.1	39.4	0.7	9.9	2.0
Small vans	5 072.9	2 100.0	8.5	401.9	64.6
Large vans	1 149.0	671.9	4.4	206.1	21.0

Source: Statistics Norway.

[Explanation of symbols](#)

2009 © Statistics Norway

**Table 4.5**

**7 Transport by vans and small lorries, by type of transport and type of employer. 2008**

	Vehicle-kilometres		Tonnage carried	Goods transport performance	Number of laden journeys
	Total	Laden journeys			
	<i>Millions</i>		<i>Million tonnes</i>	<i>Million tonne-kms</i>	<i>Millions</i>
Type of transport					
All vans and small lorries	7 604.9	3 200.6	18.2	836.3	97.7
Hire or reward	599.9	511.6	3.1	233.7	9.7
Own account	7 005.0	2 689.0	15.0	602.6	88.0
Multi-stop journeys	967.1	853.3	5.0	326.7	20.8
Hire or reward	491.1	424.3	2.6	198.4	6.9
Own account	476.0	429.0	2.5	128.3	13.9
Single-stop journeys	600.5	461.0	3.7	146.2	15.9
Hire or reward	108.8	87.3	0.6	35.3	2.7
Own account	491.7	373.8	3.2	110.9	13.1
Service vehicle with some goods carried	2 344.0	1 854.0	9.3	359.9	60.1
Service vehicle with no goods carried	1 382.0	27.3	0.1	2.6	0.7
Private use	2 311.3	4.9	0.0	0.9	0.2

Source: Statistics Norway.

[Explanation of symbols](#)

2009 © Statistics Norway

**Table 4.6**

**8 Transport by vans and small lorries, by county<sup>1</sup>, 2008**

County	Vehicle-kilometres		Tonnage carried	Goods transport performance	Number of laden journeys
	Total	Laden journeys			
	Millions		Million tonnes	Million tonne-kms	Millions
All vans and small lorries	7 604.9	3 200.6	18.2	836.3	97.7
Østfold	518.3	199.6	1.1	59.7	5.1
Akershus	842.2	364.4	1.8	94.3	10.6
Oslo	877.9	457.4	2.7	121.8	13.9
Hedmark	442.1	160.9	0.5	35.6	3.2
Oppland	445.2	175.8	0.7	57.2	4.0
Buskerud	230.5	81.0	0.5	26.8	2.0
Vestfold	369.2	163.5	0.9	43.3	4.1
Telemark	324.3	132.3	0.6	28.7	3.5
Aust-Agder	172.7	59.6	0.4	20.0	2.1
Vest-Agder	250.4	97.3	0.7	23.6	3.3
Rogaland	630.9	287.8	1.7	58.8	10.9
Hordaland	622.6	282.9	2.3	84.8	9.7
Sogn og Fjordane	186.6	78.4	0.4	16.1	2.0
Møre og Romsdal	371.5	147.4	1.0	32.8	5.2
Sør-Trøndelag	369.2	139.5	0.8	41.9	4.8
Nord-Trøndelag	226.4	101.3	0.9	29.4	3.7
Nordland	320.5	124.4	0.7	31.1	4.8
Troms Romsa	233.9	99.8	0.3	19.4	3.4
Finnmark Finnmarku	128.5	36.5	0.3	6.1	1.3
Utenfor Norge	42.0	10.9	0.0	4.8	0.1

<sup>1</sup> Reported transport by county in week of survey.

Source: Statistics Norway.

Explanation of symbols

2009 © Statistics Norway

### *The Netherlands*

Although the figures on the vehicle fleet in the Netherlands could not easily be used as an estimate or blue print for the other European countries, however they might serve for some illustrative purposes. One major question to be answered was the fact to which extent LGVs were used for own account transport and for professional freight transport. The main difference between both categories lies in the fact that whether a certain company has commercial road freight transport as its primary activity (= professional transport) or not.

### *Total number of LGVs in the Netherlands*

To some extent Dutch vehicle statistics also missed figures. However, on the basis of recombining available figures some facts were retrieved.

Per 1 January 2009 about 894,000 LGVs with a GVW of 3,5 tonnes or less were active in the Netherlands (source: Dutch vehicle registrations RDW; see table 4.7). It was estimated that about 21% hereof (191,000) were used by private persons for non-commercial purposes. Of the remaining 703,000 about 225,000 were used in the transport of persons. The last fraction of 479,000 LGVs therefore were used for the transport of goods. This was about 53% of the total number of LGVs (see table 4.8).

**Table 4.7 Number of active road vehicles in the Netherlands  
(estimates as per 1-1-2009)**

Vehicle class	Total fleet (NL)
Private cars	7,670,000
Vans (LGVs)	894,000
Trucks	131,000
Total	8,695,000

Source: RDW/EIM

**Table 4.8 Number of active LGVs in the Netherlands  
(estimates as per 1-1-2009)**

	Goods transport	Persons transport	Private	Total
Number	478,826	224,707	190,909	894,442
Percentage	53%	25%	21%	100%

Source: Study on Dutch vans ("Ontwikkeling kostenniveau bestelwagens");  
NEA 2009

#### *Professional Versus own Account Transport*

Although nearly 480,000 LGVs were used for the transport of goods, the vast majority hereof was used by companies that have other activities than transport operations as their main business. Examples hereof were maintenance companies and all kinds of small businesses like bakeries that distributed their own products. This own account transport accounted for about 94% of the total number of LGVs that transport goods (see table 4.9). The remaining 6% (27,000 LGVs) were used in commercial road freight transport. Of this remaining total only an unknown fraction was (also) used for international transports.

**Table 4.9 Number of LGVs active in goods transport in the Netherlands  
(estimates as per 1-1-2009)**

	Professional transport	Own account transport	Total
Number	26,548	452,278	478,826
Percentage	6%	94%	100%

Source: Study on Dutch vans ("Ontwikkeling kostenniveau bestelwagens");  
NEA 2009

*"Production" of LGVs*

Apart from the actual number the production (i.e. the number of trips or the number of transported units) of LGVs might provide some further information to answer the main question of the study. Dutch LGVs showed an average mileage per year of 23,000 kilometres (see table 4.10). Especially when this figure was compared with larger trucks, this total was only about one third hereof. This figure suggested — assuming that the number of working hours was comparable — that LGVs were commonly operated on transport assignments with, on average, short(er) distances. Single trip distances in commercial road freight transport with large trucks in long distance international transport, typically ranged between 200 to over 1.500 kilometres.

When the key figures of LGVs operated in own account transport were compared with those that were operated in professional commercial road freight transport, the loaded single trip distance was about half of the average load weight per assignment. The load factor (load weight divided by loading capacity) in both sectors was comparable (see table 4.11) at a level of about 50%. The high productive mileage (loaded mileage divided by total mileage) of about 80% in relation to the low load factor suggested a type of transport assignment in the form of round trips with several loading and unloading locations ("pick-up and delivery"). The cargo that was transported was mainly consumer goods which was typically of high volume and light in weight. This last conclusion might also be one of the main reasons for the fairly low load factor.

**Table 4.10 Average vehicle mileage of vehicles Dutch SMEs  
(estimates as per 1-1-2009)**

Vehicle class	Own account (avg. kms per year)	Professional (avg. kms per year)	Average mileage per year (kms)
Private cars	26,743	43,240	28,905
Vans (LGVs)	21,893	28,324	23,309
Trucks	70,705	88,968	75,153

Source: RDW/EIM

**Remark:**

The average yearly mileage for trucks that were operated internationally ranges from 130,000 to 180,000 kilometres per year.

**Table 4.11 Key figures on Dutch LGVs (estimates as per 1-1-2009)**

Key figure	Own account	Professional
Loaded trip distance	50 kilometres	101 kilometres
Total trip distance	70 kilometres	125 kilometres
Average load weight	550 kilogram	1,000 kilogram
Load factor	50%	51%

Source: Study on Dutch vans ("Ontwikkeling kostenniveau bestelwagens");  
NEA 2009

### 4.3 Conclusion

#### *Eurostat-data (TRANSTOOLS)*

One of the main objectives of this study was to determine the share of LGVs in international commercial road freight transport. The Eurostat maintains data on the active fleet of freight vehicles, however when addressing these figures the following problems were encountered:

- A division of the total active fleet into weight categories (Maximum Load Capacity, MLC) was not available for all countries;
- The "years" of the data varied substantially and thus undermined the validity of comparisons between countries;
- Nothing was known on the values of the essential figures for the share determination:
  - Number of trips or vehicle kilometres per year
  - The share of border crossing transport
  - The share of commercial versus own account transport.

These problems made it virtually impossible to use solely Eurostat-data to determine the share of LGVs in commercial road freight transport.

#### *Country Level Statistics*

Desk research showed that for the vast majority of the countries, reliable figures on both the number of trips and the share of professional freight transport of LGVs seemed to be almost completely missing. This fact was confirmed in a special questionnaire which was sent to the MoTs and national members of the IRU.

However a very few countries: e.g. France, Great Britain, Norway, performed a more profound study on a regular basis, of the share and "production" (number of trips, vehicle kilometres, cargo transported, etc.) of LGVs. The main source of this information was a special questionnaire which is comparable with the one which is in use for the large (commercial) freight vehicles. Although a lot of additional information was collected in this way, it also burdened the transport sector with additional administrative costs as the professional transport operator had to fill out the questionnaire. The transport operators are generally strongly against any additional increases of the administrative burdens.

#### *Overall Conclusion*

Though it was known from the start of the project that essential statistical data is missing, we performed a data collection exercise to investigate if any other related figures were available, e.g. active park figures. However, as the only relevant figures found on the European scale at best only provided some information on the active fleet per country we concluded that the main question of this study: "Are LGVs a problem in international commercial road freight transport?" could not be answered solely on the basis of statistical data collection.





## 5 Results for Europe

### 5.1 Conclusions

#### "Not a serious European problem"

The overall picture in table 5.1 shows that the importance, the share or the "problem" of LGVs in international freight transport on EU scale is still relatively limited.

#### *Costs calculation results*

A very important determinant of the use of a certain freight vehicle concept is its freight cost price per transported unit. As international road freight transport is a strictly economic activity, and thus is driven by economic principles, substantial cost price differences are the main drivers of the selection of a certain freight vehicle. The results of the costs calculation exercises showed clearly that the cost price level differences between LGVs and the heavier freight vehicles (L-HGVs and HGVs) were at least 25% in favour of the latter in all countries in Europe. Based on economic principles, LGVs will therefore not be used in international road freight transport.

#### *Maximum share*

The average level of the maximum share of LGVs as determined on the basis of a freight flow analysis was 4.9%. Although several countries had shares just below and above this threshold, (marked as "orange") only one country, Sweden, showed as "red". This result showed also that for several countries there was cargo available that could be transported by LGVs. However, the still very substantial cost price differences between LGVs and the heavier vehicles prevented this from happening.

However, notwithstanding the remarks on cost price differences between the main types of freight vehicles, there could be several bilateral transport relations in which LGVs could be a problem. These relations and the countries that are part of this relation have been listed below.

The results of the analysis of the transport flows suggested that in the following countries there might be a problem with LGVs:

- south-western region: France and Italy
- south-eastern region: Hungary
- north-western region: Belgium, Sweden
- north-eastern region: Poland
- Austria.

Important bilateral flows between the countries which had not only a fairly high volume but also stated in the questionnaire that they could have a problem with LGVs in international transport were:

- Austria → Italy (7.8 billion tonnes)
- Austria → Hungary (1.4 billion tonnes)
- Belgium → France (22.4 billion tonnes)
- France → Belgium (17.0 billion tonnes)
- France → Italy (14.0 billion tonnes)

- Hungary → Austria (2.7 billion tonnes)
- Italy → Austria (2.9 billion tonnes)
- Italy → France (12.8 billion tonnes).

*Results of the questionnaire*

A questionnaire was distributed to two main stakeholder groups, e.g. Ministries of Transport (or comparable organisations) and the national professional associations of transport operators (and also IRU-member). The questionnaire was addressing the respondents' opinion on the use of LGVs in international freight transport. The vast majority of the respondents replied concerning these LGVs that there was in their country no problem and there was also no additional national legislation especially addressing these vehicles. However, some respondents noticed some problems that relate to the use of LGVs in international transport. These countries were: Austria, Belgium, Bulgaria, France, Hungary, Poland and Romania. On the question if special legislation was maintained for LGVs a few respondents, such as Austria and Sweden, mentioned that for LGVs (parts of) the same legislation that already existed for the larger freight vehicles with a G.V.W. of 3,5 tonnes or higher had been applied.

Of particular interest were the results for the countries: Bulgaria, Romania and Poland. In these countries the answers on the question if they regarded international freight transport by LGVs as a serious issue, differed for the representatives of the Ministry and of the professional association of transport operators.

The questionnaire provided insight in the felt urgency for addressing LGVs in international road freight transport. In total three questionnaires were returned in which the respondents stated that additional legislation already exists. The respondents were originating from: Austria, Italy and Sweden.

In total eight questionnaires from seven countries were returned in which the respondent stated that international transport by LGVs causes unfair competition. All these respondents Austria stated that additional legislation addressing LGVs would be necessary.

**Table 5.1 Overall results for Europe**

Country	Cost Calculation	Maximum Share	Legislation	Overall
Austria				
Belgium				
Bulgaria				
Cyprus				
Czech republic				
Denmark			missing	
Estonia				
Finland			missing	
France				
Germany				
Greece				
Hungary				
Ireland			missing	
Italy				
Latvia				
Lithuania			missing	
Luxembourg				
Malta			missing	
Netherlands				
Norway			missing	
Poland				
Portugal			missing	
Romania				
Slovakia				
Slovenia				
Spain				
Sweden				
Switzerland			missing	
United Kingdom				
Total	29	1910	912	121222

	There is with great certainty no problem.
	There might be a problem.
	There is almost certainly a problem.

### *Results of Data Collection*

For a full analysis at European level of the share of LGVs we needed the figures in principle for all or at least a large majority of the European countries (EU-27, Switzerland, Norway). Detailed figures for only a few countries were therefore not an option to sketch the full picture for Europe.

However, for the vast majority of the countries, reliable figures on both the number of trips and the share of professional freight transport of LGVs were nearly completely missing. This fact was confirmed in a special questionnaire which was sent to the MoTs and national members of the IRU. Though this fact was known from the start of the project, we performed a data collection exercise to investigate if any of related figures were available, e.g. active park figures.

Especially one source of statistical data on active fleets was analysed in more detail, e.g. Eurostat (TRANSTOOLS). The following observations were made:

- A division of the total active fleet into weight categories (Maximum Load Capacity, MLC) was not available for all countries.
- The “year” of the data varied substantially and thus undermined the validity of comparisons between countries.
- Nothing was known on the values of the following figures, essential for the share determination:
  - Number of trips or kilometres per year
  - The share of border crossing transport
  - The share of commercial versus own account transport.

Very few countries: e.g. France, Great Britain, regularly performed a more profound study of the share and “production” of LGVs. Although a lot of additional information was collected in this way, it also burdened the transport sector with additional administrative activities in the form of, amongst other things, mandatory fillig out of an additional questionnaire. The transport operators were generally strongly against any additional increase of the administrative burdens.

On the basis of these essential missing data elements we therefore concluded that the main question of this study: “Are LGVs a problem in international commercial road freight transport?” could not be answered solely on the basis of statistical data collection.

## 5.2 Recommendations

*Recommendation 1: "No new or adaptation of EU-legislation with substantial cost increase effects for L-HGVs and or HGVs without also addressing LGVs"*

LGVs are not a European level problem. However, a substantial increase of about 25% in cost price per transported unit of especially L-HGVs may cause the crossing of a certain cost level related threshold. Such an increase could be inflicted by an increase in EU-legislation for freight vehicles above a GVW of 3.5 tonnes without also properly addressing LGVs.

*Recommendation 2: "Stimulate bilateral initiatives when addressing problems with LGV's"*

Although no European level problem with LGVs exists yet, at the bilateral level the signals have been quite clear and partly opposite. For several countries the freight flows statistics pointed out that in certain bilateral relations there was ample freight volume available that could be transported by LGVs. In combination with the results of the questionnaire ("we have already have special legislation for LGVs", or "we have been faced with problems with LGVs") this suggested that in these bilateral relations the two countries had already been faced with serious problems caused by unfair competition of LGVs. In this case a bilateral initiative regulating international transport with LGVs might be necessary.

*Recommendation 3: "Data collection initiative"*

This study was much hindered by the fact that EU-level statistics with a certain level of detail were completely missing for LGVs. At best the active fleet figures were available for three classes of freight vehicles for several more or less recent years of which one could be seen as LGVs. With a few exceptions little was known about the main activities (the transport of persons or freight) and the yearly production such as number of kilometres driven and number of trips, number of tonnes/ cubic meters transported. However, the France MoT<sup>12</sup> collected additional data on LGVs by using a special questionnaire (which is a close derivative of the obligatory questionnaire on the performances of heavier vehicles used in commercial road freight transport), which could be used as basis to answer questions like the problem unfair competition. It is therefore recommended to update the figures that concern the actual number of active LGVs and to add figures on main activities and the "production" of these LGVs. A special questionnaire, like the France VUL-enquête, could provide these information. However, one have to be aware that an additional questionnaire will further raise the administrative burdens of companies and citizens.

<sup>12</sup> Ministère des Transports, de l'équipement, du tourisme et de la mer



## Annex 1: Statistics per region

### A1.1 South-western region:

**Table A.1.1.a Overview of the South-western region.**

	<b>France</b>	<b>Year</b>	<b>Spain</b>	<b>Year</b>	<b>Italy</b>	<b>Year</b>
Area (km2)	632,8	2007	506,0	2007	301,3	2007
Population (mln)	64,4	2009	45,8	2009	60,0	2009
GDP (bln €)	1.948,0	2008	1.088,5	2008	1.572,1	2008
Motorways (kms)	10.800	2004	11.432	2004	6.478	1998
"Production" (mln tonkms)	23.466	2007	64.270	2007	24.950	2005
Goods vehicles (number)	5.417.503	2004	4.210.213	2004	4.069.035	2001
< 3 tonne MLC	5.095.473	2004	3.783.395	2004	1.958.812	2001
3-7 tonne MLC	116.559	2004	126.911	2004	246.357	2001
> 7 tonne MLC	205.471	2004	299.907	2004	1.863.866	2001
Freight volume bila (1000 tonnes)	62.648,0	2005	15.480,1	2005	20.464,1	2005

**Table A.1.1.b Overview of the South-western region.**

	<b>Austria</b>	<b>Year</b>	<b>Portugal</b>	<b>Year</b>	<b>Switzerland</b>	<b>Year</b>
Area (km2)	83,9	2007	92,1	2007	41,3	2007
Population (mln)	8,4	2009	10,6	2009	7,7	2009
GDP (bln €)	281,9	2008	166,4	2008	341,5	2008
Motorways (kms)	1.696	2007	2.613	2007	1.341	2003
"Production" (mln tonkms)	15.146	2007	18.056	2007	1.527	2007
Goods vehicles (number)	354.000	2007	1.829.158	2001	297.088	2004
< 3 tonne MLC	306.000	2007	1.481.877	2001	257.197	2004
3-7 tonne MLC	14.000	2007	68.303	2001	10.385	2004
> 7 tonne MLC	34.000	2007	278.977	2001	29.506	2004
Freight volume bila (1000 tonnes)	25.425,6	2005	5.380,8	2005	8.731,0	2005

## A1.2 South-eastern region:

**Table A.1.2.a Overview of the South-eastern region.**

	<b>Hungary</b>	<b>Year</b>	<b>Bulgaria</b>	<b>Year</b>	<b>Greece</b>	<b>Year</b>	<b>Rumania</b>	<b>Year</b>
Area (km2)	93,0	2007	110,9	2007	132,0	2007	238,4	2007
Population (mln)	10,0	2009	7,6	2009	11,3	2009	21,5	2009
GDP (bln €)	105,7	2008			239,1	2008	135,3	2008
Motorways (kms)	785	2004	418	2007	280	1998	281	2007
"Production" (mln tonkms)	15.407	2007	5.786	2007	4.458	2005	32.100	2007
Goods vehicles (number)	418.360	2005	239.769	2004	906.455	2002	467.280	2007
< 3 tonne MLC	352.198	2005			815.235	2002		
3-7 tonne MLC	42.932	2005			43.135	2002		
> 7 tonne MLC	14.851	2005			48.085	2002		
Freight volume bila (1000 tonnes)	7.822,7	2005	2.150,2	2005	865,7	2005	2.439,6	2005
Freight volume bila LGV(1000 tonnes)	299,7	2005	70,1	2005	22,2	2005	58,2	2005

**Table A.1.2.b Overview of the South-eastern region.**

	<b>Cyprus</b>	<b>Year</b>	<b>Malta</b>	<b>Year</b>	<b>Slovenia</b>	<b>Year</b>
Area (km2)	9,3	2007	0,3	2007	20,3	2007
Population (mln)	0,8	2009	0,4	2009	2,0	2009
GDP (bln €)	17,2	2008	5,7	2008	37,1	2008
Motorways (kms)	276	2004			579	2007
"Production" (mln tonkms)	12	2007			8.612	2007
Goods vehicles (number)	116.797	2004	42.615	2001	68.888	2007
< 3 tonne MLC	107.398	2004	10.192	2001	53.311	2007
3-7 tonne MLC	5.127	2004	25.685	2001	5.224	2007
> 7 tonne MLC	4.272	2004	6.738	2001	10.356	2007
Freight volume bila (1000 tonnes)	0,0	2005	0,0	2005	4.257,4	2005
Freight volume bila LGV(1000 tonnes)	0,0	2005	0,0	2005	133,6	2005



## A1.3 North-western region:

**Table A.1.3.a Overview of the North-western region.**

	<b>Belgium</b>	<b>Year</b>	<b>Germany</b>	<b>Year</b>	<b>Denmark</b>	<b>Year</b>	<b>United Kingdom</b>	<b>Year</b>	<b>Ireland</b>	<b>Year</b>
Area (km <sup>2</sup> )	30,5	2007	357,1	2007	43,1	2007	242,9	2007	70,3	2007
Population (mln)	10,8	2009	82,0	2009	5,5	2009	61,6	2009	4,5	2009
GDP (bln €)	344,0	2008	2.492,3	2008	232,5	2008	1.821,8	2008	181,9	2008
Motorways (kms)	1.763	2005	12.594	2007	1.010	1998	3.669	2007	247	2004
"Production" (mln tonkms)	16.265	2007	65.614	2007	8.252	2007	10.574	2005	3.187	2007
Goods vehicles (number)	642.687	2007	2.323.064	2007	389.362	2001	2.600.000	2007	268.082	2003
< 3 tonne MLC			1.988.119	2007	359.118	2001	2.460.000	2007		
3-7 tonne MLC			153.379	2007	9.662	2001	90.000	2007		
> 7 tonne MLC			181.566	2007	20.582	2001	50.000	2007		
Freight volume bila (1000 tonnes)	43.433,0	2005	98.922,4	2005	4.356,9	2005	518,9	2005	212,7	2005
Freight volume bila LGV(1000 tonnes)	2.624,0	2005	5.766,3	2005	244,5	2005	13,0	2005	5,3	2005

**Table A.1.3.b Overview of the North-western region.**

	<b>Luxembourg</b>	<b>Year</b>	<b>Netherlands</b>	<b>Year</b>	<b>Norway</b>	<b>Year</b>	<b>Sweden</b>	<b>Year</b>
Area (km2)	2,6	2007	37,4	2007	323,8	2007	441,4	2007
Population (mln)	0,5	2009	16,5	2009	4,8	2009	9,3	2009
GDP (bln €)	39,3	2008	595,9	2008	309,6	2008		
Motorways (kms)	137	2003	2.342	2003	239	2007	1.806	2007
"Production" (mln tonkms)	2.728	2007	36.195	2007	3.876	2007	3.614	2007
Goods vehicles (number)	21.730	2000	970.583	2003	505.659	2007	495.661	2007
< 3 tonne MLC	16.499	2000	906.582	2003	462.371	2007	435.241	2007
3-7 tonne MLC	1.640	2000	17.696	2003	10.408	2007	12.987	2007
> 7 tonne MLC	3.591	2000	46.305	2003	32.880	2007	47.433	2007
Freight volume bila (1000 tonnes)	3.250,5	2005	27.738,3	2005	2.885,1	2005	5.254,0	2005
Freight volume bila LGV(1000 tonnes)	174,7	2005	1.236,1	2005	119,5	2005	350,4	2005

## A1.4 North-eastern region:

**Table A.1.4.a Overview of the North-eastern region.**

	<b>Estonia</b>	<b>Year</b>	<b>Latvia</b>	<b>Year</b>	<b>Lithuania</b>	<b>Year</b>	<b>Poland</b>	<b>Year</b>
Area (km <sup>2</sup> )	45,2	2007	64,6	2007	65,3	2007	312,7	2007
Population (mln)	1,3	2009	2,3	2009	3,3	2009	38,1	2009
GDP (bln €)	16,1	2008	23,2	2008	32,2	2008	363,1	2008
Motorways (kms)	96	2007	0	2007	309	2007	663	2007
"Production" (mln tonkms)	3.963	2007	5.812	2007	9.375	2007	67.492	2007
Goods vehicles (number)	80.280	2007	113.228	2007	126.507	2007	2.345.068	2007
< 3 tonne MLC	51.926	2007	68.427	2007	66.784	2007	1.979.255	2007
3-7 tonne MLC	8.220	2007	28.289	2007	37.206	2007	214.049	2007
> 7 tonne MLC	20.134	2007	16.512	2007	22.517	2007	151.764	2007
Freight volume bila (1000 tons)	424,2	2005	1.541,4	2005	3.118,7	2005	17.951,2	2005
Freight volume bila LGV(1000 tons)	19,1	2005	78,4	2005	58,9	2005	969,4	2005

**Table A.1.4.b Overview of the North-eastern region.**

	<b>Czech Republic</b>	<b>Year</b>	<b>Slovakia</b>	<b>Year</b>	<b>Finland</b>	<b>Year</b>
Area (km <sup>2</sup> )	78,9	2007	49,0	2007	338,4	2007
Population (mln)	10,5	2009	5,4	2009	5,3	2009
GDP (bln €)	147,8	2008	64,8	2008	184,7	2008
Motorways (kms)	657	2007	328	2007	700	2007
"Production" (mln tonkms)	25.123	2007	12.934	2007	2.108	2007
Goods vehicles (number)	533.916	2007	163.067	2003	390.530	2007
< 3 tonne MLC	456.657	2007	missing		333.181	2007
3-7 tonne MLC	33.293	2007	missing		12.150	2007
> 7 tonne MLC	43.966	2007	missing		45.199	2007
Freight volume bila (1000 tons)	27.312,5	2005	13.594,2	2005	427,5	2005
Freight volume bila LGV(1000 tons)	932,0	2005	255,5	2005	20,4	2005



## Annex 2: Main results of the questionnaire

### A2.1 General comments for all regions

In Total 17 ministries and 11 associations (See table A2.1) replied to our questionnaire. In some cases, like the United Kingdom, it was difficult to reach contacts to fill in our questionnaire. The extra effort for the United Kingdom paid off in the end, when 3 questionnaires were filled in. When more than one questionnaire was filled in by a country, special attention was paid to conflicting answers. Where this was relevant this has been highlighted in the country reports. Of course associations may sometimes have conflicting opinions towards their ministries.

In some cases the level of English of the respondents may not have been sufficient to understand the questions completely. In our opinion however, the majority of respondents gave a clear impression of the objectives of our study. The majority of analysed legislation does not contain LGVs in its scope. Exceptions can mainly be found in the road charging section, but here sometimes national and international applicable rules may have been mixed up by the respondents.

**Table A2.1 Overview of respondents (EU27, Norway, Switzerland)**

<b>Country</b>	<b>Ministry</b>	<b>IRU Associate</b>	<b>No Reply</b>
Austria	✓		
Belgium	✓	✓	
Bulgaria	✓	✓	
Cyprus	✓		
Czech republic	✓		
Denmark			X
Estonia	✓		
Finland			X
France	✓		
Germany		✓	
Greece		✓	
Hungary	✓		
Ireland			X
Italy		✓	
Latvia	✓		
Lithuania			X
Luxembourg	✓		
Malta			X
Netherlands	✓	✓	
Norway			X
Poland	✓	✓	
Portugal			X
Romania	✓	✓	
Slovakia	✓		
Slovenia	✓		
Spain		✓	
Sweden	✓		
Switzerland			X
United Kingdom	✓	✓✓	
<b>Total</b>	<b>17</b>	<b>11</b>	<b>8</b>

## A2.2 Overview Questionnaires Region one: South-West Europe

<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Austria	1. Güterbeförderungsgesetz 1995, BGBl. Nr. 593/1995 zuletzt geändert durch BGBl. I Nr. 153/2006, § 27a 2. Berufszugangs-Verordnung Güterkraftverkehr, BGBl. Nr. 221/1994 zuletzt geändert durch BGBl. II Nr. 280/2000; §§ 14, 15, 18, Anlage 3 3. Kraftfahrliniengesetz, BGBl. Nr. I 203/1999 zuletzt geändert durch BGBl. Nr. I 153/2006 4. Gelegenheitsverkehrs-Gesetz 1996, BGBl. Nr. 112/1996 zuletzt geändert durch BGBl. I Nr. 153/2006, § 22 5. Berufszugangsverordnung Kraftfahrlinien- und Gelegenheitsverkehr, BGBl. Nr. 889/1994 zuletzt geändert durch BGBl. II Nr. 46/2001 §§ 18, Anlage 5 und Anlage	All these regulations are dedicated to govern the access to professional transport of goods and passengers. Documents Nr. 1 and 2 in the list do include LGV. The other ones address transport of passengers, but include vehicles below 3.5 t GVW either.
France	Law Nr 82-1153 of 30 December 1982 Decision Mr 99-752 of 30 August 1999	Does not include LGVs
Italy	Law Nr 395 of 22/12/2000 Ministerial decision 161 of 18/4/2005	Vehicles above 1.5 tonnes
Portugal	No reply to our Questionnaire	
Spain	Was not filled in	

<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Austria	1. ASFINAG-Gesetz, BGBl. Nr. 591/1982 zuletzt geändert durch BGBl. I Nr. 82/2007, Art. 2 § 11 2. Bundesstraßen-Mautgesetz 2002, BGBl. I Nr. 109/2002 zuletzt geändert durch BGBl. I Nr. 82/2007, §§ 7, 9, 35, 37 3. Verwirklichung eines Eisenbahnbasistunnels auf der Brennerachse, BGBl. III Nr. 177/2006, Art. 9	This includes LGV since it is intended to collect toll for all vehicles.  One purpose of this law is to settle the arrangements between Austria and Italy concerning the construction of the Brenner Base Tunnel. This only concerns HGVs
France	Road transport Code, articles L.122-4-1 and L.153-4-1 Decisions Nr 2008-411 of 29 April 2008	No LGVs, from 12 tonnes
Italy	Not yet transposed into Italian legislation	
Portugal	No reply to our Questionnaire	
Spain	Was not filled in	

<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Austria	1. Arbeitsruhegesetz, BGBl. Nr. 144/1983 zuletzt geändert durch BGBl. I Nr. 138/2006, §§ 22a, 22c, 27, 34 2. Arbeitszeitgesetz, BGBl. Nr. 461/1969 zuletzt geändert durch BGBl. I Nr. 138/2006, §§ 13, 13a, 15d, 15e, 17, 24, 28 and 33 3. Kraftfahrgesetz 1967, BGBl.Nr. 267/1967 zuletzt geändert durch BGBl. I Nr. 94/2009, §§ 102, 102a, 103b, 114, 134, 134a, 136 4. Lenker/innen-Ausnahmeverordnung, BGBl. II Nr. 23/2008, §§ 2 and 3	According to the respondent these laws apply to all vehicles, when checked the legislation however clearly distinguish LGVs: " zur Güterbeförderung dient und dessen zulässiges Gesamtgewicht, einschließlich Anhänger oder Sattelanhänger, 3,5 Tonnen übersteigt"
France	These regulations apply directly	Does not include LGVs
Italy	Direct applicable in Italy	Does not include LGVs
Portugal	No reply to our Questionnaire	
Spain	Was not filled in	

### A2.3 Overview Questionnaires Region two: South-East Europe

<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Bulgaria	The requirements of Directive 96/26/EC are introduced in the Bulgarian legislation with Road Transport Law ( <i>Promulgated State Gazette 82/17 Sep 1999, last amend. SG. 102/28 November 2008</i> ) and Ordinance № 11 of 31 October 2002 on international carriage of passengers and goods by road.	LGVs are only included for international transport with countries needing a permit
Cyprus	The access to the road haulage occupation Law of 2001 to 2009 [101(I)/2001, 15(I)/2009, 101(I)/2009]	LGVs not included
Greece	Questionnaire does not contain this info, as in Greece LGVs are not allowed to perform international transport	
Hungary	<i>Ministerial decree no. 14/2001 about professional conditions and licensing procedure of domestic and international road transport</i> Ministerial decree no. 49/2001 about professional conditions and authorisation of domestic and international passenger transport by coach	Maybe includes LGVs, could not be checked properly
Malta	No reply to our Questionnaire	
Romania	Expeditious Government Ordinance no. 109 of 14 July 2005 on road transport approved by Law no. 102 of 25 April 2006, and subsequently amended by: Expeditious Government Ordinance no. 73 of 20 September 2006 for the prorogation article 70 paragraph (2) of Expeditious Government Ordinance no. 109/2005 on road transport provisions; Government Ordinance no. 45 of 28 August 2007 for the	Does not include LGVs



	amendment and completion of Expeditious Government Ordinance no. 109/2005 on road transport, approved by Law no. 42 of 19 March 2008; Expeditious Government Ordinance no. 74 of 11 June 2008 for the amendment and completion of Expeditious Government Ordinance no. 109/2005 on road transport, approved by Law no. 218 of 2 June 2009.	
Slovenia	National transport law	Does not include LGVs

By which law is <b>Directive 1999/62/EC</b> on Road Charging introduced?		
Country	National Legislation	Comments
Bulgaria	By Roads Act (Promulgated State Gazette 26/29.03.2000, last amend. SG. 82/16.10.2009) and Ordinances for its implementation.	Includes LGVs
Cyprus	The charging of heavy goods vehicles for the use of certain infrastructures Law of 2009 [Law 19(I)/2009]	Does not include LGVs
Greece	Questionnaire does not contain this info, as in Greece LGVs are not allowed to perform international transport	
Hungary	<i>Ministerial decree no. 36/2007 about fees to paid for the use of freeways, highways and major roads</i> Ministerial decree no. 37/2007 about freeways, highways and major roads to be used for a fee	In case of road toll LGVs are included under category D1: meaning all vehicles up to 3.5 tonnes
Malta	No reply to our Questionnaire	
Romania	Government Ordinance no. 15 of 24 January 2002 on the introduction of certain user charges for the road transport infrastructure approved by Law no. 424 of 27 June 2002 In respect of vehicle tax the Directive 1999/62/EC has been transposed into the Romanian legislation by Law 571 of 22 December 2003 on Fiscal Code In respect of tolls the Directive 1999/62/EC has been transposed into the Romanian legislation by Government Ordinance no. 43 of 28 August 1997 on legal regime of roads	Do include LGVs
Slovenia	Act on tolls for vehicles of which the maximum permissible gross laden weight exceeds 3,500 kg	Does not include LGVs

<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Bulgaria	The requirements of Regulation (EC) № 561/2006 and Regulation (EEC) № 3821/85 are introduced in the Bulgarian legislation with Ordinance № H-3 of 7 April 2009 on the necessary measures for the implementation and enforcement of Regulation (EEC) № 3821/85 and Regulation (EC) № 561/2006.	LGVs are not included
Cyprus	The Control of Working and Resting Times of Drivers of Certain Vehicles Law of 2007 (Law 86(I)/2007)	Does not include LGVs
Greece	Questionnaire does not contain this info, as in Greece LGVs are not allowed to perform international transport	
Hungary	Law no. 1/1988 about road transport Governmental decree no. 66/2007. about the control of driving and resting time of vehicles' crew performing road haulage Governmental decree no. 156/2009 on the amount of the penalties that may be levied in case of infringement of certain rules related to the road goods transport, passenger transport and road traffic, as well as on the tasks of the authorities concerning the application of such penalties Ministerial decree no. 43/2007 about detailed rules of checks performed by the transport authority based on the certain social rules concerning road transport Ministerial decree no. 124/2005 about implementation of regulation 3821/85/EEC Ministerial decree no. 6/1990 about the conditions of putting and keeping in service of road vehicles	Not directly applicable to LGVs
Malta	No reply to our Questionnaire	
Romania	Government Ordinance no. 37 of 7 August 2007 on the establishment of the framework for the application of rules on driving times, breaks and rests of drivers and the use of recording equipment for their activity	Does not include LGVs
Slovenia	Act on Working Time and Compulsory Rest Periods of Persons Performing Mobile Road Transport Activities, and on Recording Equipment in Road Transport.	Do not include LGVs

## A2.4 Overview Questionnaires Region three North-West Europe

<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Belgium	Law of 3 May 1999 regarding road transport of goods, implemented by Royal Decision of 7 May 2002 and Ministerial Decision of 8 May 2002	This law does not apply to vehicles with a lower loading capacity of 500 kg
Denmark	No reply to our Questionnaire	
Germany	Güterkraftverkehrsgesetz, Berufszugangsverordnung	Does not include LGVs
Ireland	No reply to our Questionnaire	
Luxembourg	Law on Road Transport of 30 July 2002	Does not include LGVs
Netherlands	Wet Wegvervoer Goederen (WVG/Law on Road Transport of Goods)	The WVG for international transport only requires a license for vehicles above 3.5 tonnes
Sweden	Yrkestrafiklagen (1998:490) Commercial Transport Law This Law covers many aspects of road transport, including that with LGVs	Includes LGVs
United Kingdom	Goods Vehicle Licensing of Operators Act 1995 plus Goods Vehicle Licensing of Operator Regulations 1995.	Does not include LGVs

<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Belgium	Law of 13 March 2001	Includes also Eurovignette applying to vehicles with more than 12 tonnes
Denmark	No reply to our Questionnaire	
Germany	Autobahnmautgesetz	From 12 tonnes
Ireland	No reply to our Questionnaire	
Luxembourg	Law of 24 February 1995	Above 12 tonnes
Netherlands	Wet op de motorrijtuigenbelasting 1994 (Law on Vehicle Tax 1994)	All vehicles, including LGVs
Sweden	Vägtrafikskattelagen (2006:227)	Does not include LGVs
United Kingdom	The United Kingdom does not operate a national road charging scheme. Any scheme in place is local or regional.	

<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Belgium	Royal decision of 14 July 2005 and Royal decision of 9 April 2007	As from 3.5 tonnes
Denmark	No reply to our Questionnaire	
Germany	Fahrpersonalgesetz Fahrpersonalverordnung	Do also apply to vehicles between 2.8 and 3.5 tonnes, for road safety reasons
Ireland	No reply to our Questionnaire	
Luxembourg	Règlement grand-ducal of 13 October 2006	Does not include LGVs
Netherlands	Arbeidstijdenwet (Law on Working Times) and Arbeidstijdenbesluit Vervoer (Decision on Working Times in Transport), specific on tachograph: Regeling Controleapparaten 2005 (Ministerial Decree on checking devices 2005)	Art 2.3.1 A lorry with a loading capacity of min. 500 tonnes
Sweden	Förordning (2004:865) direct applicable EU regulations	Do not include LGVs
United Kingdom	Statutory Instrument (S.I.) 2007 Number 1819 introduces Regulation (EC) 561/2006	Do not include LGVs

## A2.5 Overview Questionnaires Region four: North-East Europe

<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced?</b>		
<b>Country</b>	<b>National Legislation</b>	<b>Comments</b>
Czech republic	a) Act. No. 111/1994 Coll., Road Transport Act b) Act. No. 455/1991 Coll., Commercial Activity Act c) Order No. 366/1999 Coll., on methods of proving of the financial capacity	Does not include LGVs, but this could not be checked properly in Czech language legislation
Estonia	Road Transport Act (RT I 2000, 54, 346) entered into force 1.10.2000	LGVs not included, see article 3
Finland	No reply to our Questionnaire	
Latvia	Regulation of Cabinet of Ministers Nr. 120 Procedures for issuing, withdraw or suspend the special permits (licenses) and the license cards for hire and reward carriage by road Riga, 2005 February 8, Issued in accordance with the Road Transport Act of Article 6 of the fourth and fifth paragraph of Section 30 Regulation of the Cabinet of Ministers Nr. 250 Procedures for issuing passenger and freight transport certificates of professional competence Riga, 2006, April 4 Issued in accordance with the Road Transport Act of Article 6 of the fourth and fifth paragraph of Section 30 and the Law "On Regulated Professions and Recognition of Professional Qualifications Section 18 eighth paragraph	Does include N1 category vehicles (LGVs)
Lithuania	No reply to our Questionnaire	
Poland	Road Transport Act (Dz.U. 2001 nr 125, poz. 1371); Act on amendment and derogation of acts due to the accession of Republic of Poland to EU (Dz.U. 2004, nr 96, poz. 959); Transport Minister Act amending the Act on admission of certificate of competence in road transport. (Dz.U. 2007, nr 168, poz. 1184).	Does not include LGVs
Slovakia	Act No 168/1996 Coll. on the Road transport and by Decree of Ministry of Transport, Posts and Telecommunications of the Slovak Republic No. 311/ 1996 Coll. implementing the Act of the National Council of the Slovak Republic No 168/1996 Coll. on the road transport.	Does not include LGVs

By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced?		
Country	National Legislation	Comments
Czech republic	Act No. 13/1997 Coll., on Road Network	Does not include LGVs, but this could not be checked properly in Czech language legislation
Estonia	Heavy vehicle taxation act (RT I 2000, 81, 515), entered into force 1.1.2003	This act applies only to vehicles with gross weight over 12 tonnes.
Finland	No reply to our Questionnaire	
Latvia	The Law of on Annual Vehicle Tax (01.01.2002) with amendments	Includes LGVs
Lithuania	No reply to our Questionnaire	
Poland	Road Transport Act (Dz.U. 2001 nr 125, poz. 1371); Act on amendments and derogations of acts due to the accession of Republic of Poland to EU (Dz.U. 2004, nr 96, poz. 959); Act amending the Act on motorway fees and the National Road Fund and the Road Transport Act (Dz.U. 2004, nr 96, poz. 959); Act of Minister in charge of transport on transit fee for national roads (Dz.U. 2009, nr 86, poz. 721);	Partly includes LGVs on toll fees
Slovakia	Act No 135/1961 Coll	

By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced?		
Country	National Legislation	Comments
Czech republic	Act. No. 111/1994 Coll., Road Transport Act Order No. 341/2002 Coll., on confirmation of roadworthiness and technical conditions of operating the vehicles on roads (Act. No. 56/2001 Coll., on conditions of operating the vehicles on roads)	Does not include LGVs, but this could not be checked properly in Czech language legislation
Estonia	No laws in Estonian legislation, these Regulations apply directly and no national legislation is necessary.	Does not include LGVs
Finland	No reply to our Questionnaire	
Latvia	Direct applicable in Latvia	Does not include LGVs
Lithuania	No reply to our Questionnaire	
Poland	Act on drivers working time (Dz.U. 2001 nr 123 poz. 1354); Act on the digital tachograph system (Dz.U. 2005 nr 180 poz. 1494).	Do not include LGVs
Slovakia	Act No 461/2007 Coll. on use of the recording equipment in road transport and in law No. 462/2007 Coll. on the Organisation of Working Time in transport and on amendments of the Act No 125/2006 Coll.	Do not include LGVs

## Annex 3 Country reports

### Preface

Per country (all Member States + Norway and Switzerland) the following topics are distinguished:

1. Some general (road transport related) figures.
2. The share per NSTR1 commodity group between LGVs and HGVs, estimated on the basis of bilateral international goods flows transported by road.
3. (Per group of countries) The results of the cost calculation exercises for LGVs, Light HGVs and HGVs.
4. The results of the questionnaire on legislation.
5. The overall conclusion for a certain country.

### Share of LGVs

There are no statistics at European level that describe the freight volume transported by commercial light goods vehicles. The main challenge is therefore to arrive at the requested figures in an indirect way. The one figure that is available for road transport is the total freight volume in tonnes by origin and destination and commodity group.

Starting from this freight flow data per country (see also figure A2.1) the first step has been the determination of the fraction that has been directly transported by road between two neighbouring countries (bilateral road freight transport). Thus, both domestic and transit transport have been filtered out. The remaining goods flows of which the NSTR-commodity type is known have been used to determine the share of LGVs. This conversion has been based on a table which presents a relation between a certain commodity group and the type of vehicle that could have been used. The reasoning behind this relation has been that in principle for each freight flow the most economic freight vehicle will be used. As cost prices per transported unit tend to drop as freight vehicles grow larger, the general rule has been that always the largest freight vehicle will be applied. However, one can imagine logistic concepts in which not the largest freight vehicle is seen as the most optimal, or the largest vehicle is not the cheapest.

Examples hereof are shown below:

- (lowest) Freight rate not the main selection criterion  
In this case the transport costs are just a very limited fraction of the total cost price of the goods that have to be transported. If this is the case, the selection of the actual freight vehicle is not cost price driven. Typical examples hereof are the transport of goods with very high value (or high importance) like precious metals and official documents. The typical market segments are the courier and express services.

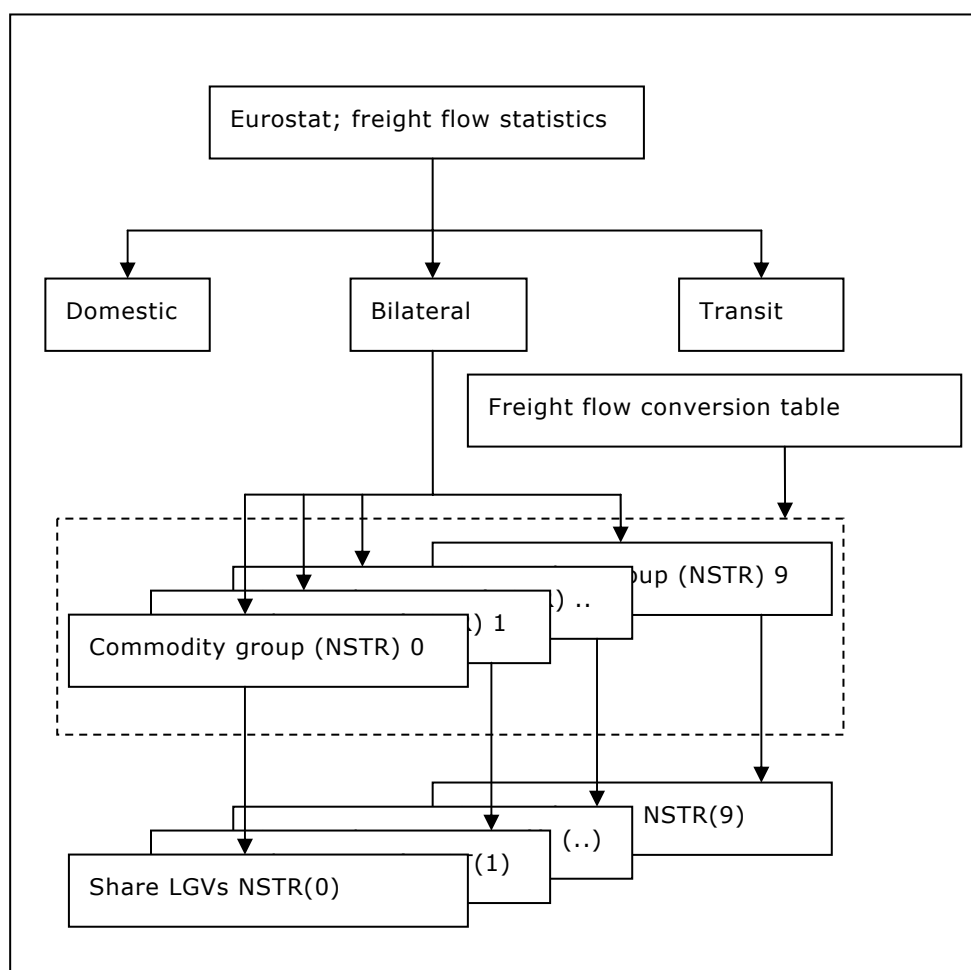
- Non-level playing field

From 3,5 tonnes loading capacity of the freight vehicle onward, a series of Directives govern professional international transport. In practice these rules limit the number of productive hours per period of a certain freight vehicle. Freight vehicles with less loading capacity are thus not ruled by these laws.

One can imagine freight concepts in which the cost-benefits of the large freight vehicles (L-HGVs and HGVs) are balanced with the extra productivity of the smaller vehicles. However, apart from the direct transport costs one has also to take the costs of loading and unloading into account.

If the value per unit of cargo drops below a certain threshold, the extra costs of loading and unloading of several small vehicles instead of one large vehicle will counter balance the productivity related cost-benefits of the smaller vehicles. From practice it has become very clear that in the transport of low value bulk commodities the LGVs are not an option at all. However, in case of commodities with higher values per unit, e.g. NSTR(9) finished products, a certain fraction could indeed be transported by LGVs.

**Figure A3.1 Determination of share of LGVs**



From past research<sup>13</sup> and information that has been retrieved from stakeholders, a table has been created in which a relation is presented between a certain commodity group and the upper limit of the fraction that could be transported with LGVs.

<sup>13</sup> Parsec-study on secured parking areas in the European Union, NEA, 2007



However, one has to bear in mind this is a theoretical approach, practical observations are at best fragmentary. The results hereof are shown in table A3.1.

**Table A3.1 Freight flows to vehicle type conversion table**  
(Based on product value per kilogram)

Code	Commodity group	LGV	L-HGV	HGV	total
0	Agricultural products	0,0	1,0	99,0	100
1	Foodstuffs	0,5	8,0	91,5	100
2	Solid mineral fuels	0,0	0,0	100,0	100
3	Crude oil+ Petroleum products	0,5	5,0	94,5	100
4	Ores, metal waste	0,0	0,5	99,5	100
5	Metal products	0,5	2,0	97,5	100
6	Building minerals & material	0,5	5,0	94,5	100
7	Fertilisers	0,0	0,0	100,0	100
8	Chemicals	1,0	5,0	94,0	100
9	Machinery & other manufacturing	13,0	25,0	62,0	100



## AT: Austria

### 1. Some general (road transport related) figures.

**Table 2.1 General data**

	Quantity
Area	83,9 thousand km <sup>2</sup>
Population	8,36 million (2009)
GDP	€ 289,9 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 2.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	1.696	2007
"Production" (mln tonkms)	15.146	2007
Goods vehicles (active fleet )	354.000	2007
< 3 tonne MLC	306.000	2007
3-7 tonne MLC	14.000	2007
> 7 tonne MLC	34.000	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

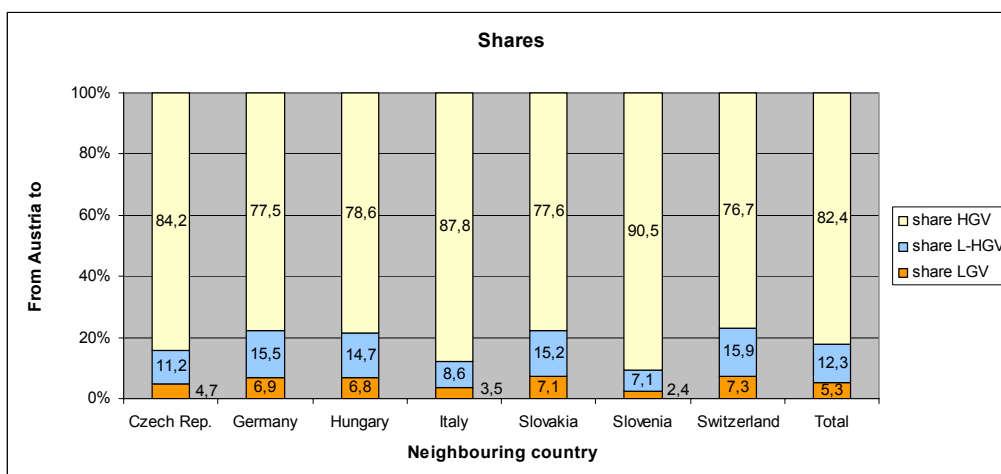
Table: road\_eqs\_lorlum

## 2. Share of LGVs (NSTR1 classification)

**Table 2.3**      **Bilateral road transport from Austria to the neighbouring countries**  
**(Number of tonnes x1000; year= 2007)**

<b>NSTR</b>	<b>Czech Rep.</b>	<b>Germany</b>	<b>Hungary</b>	<b>Italy</b>	<b>Slovakia</b>	<b>Slovenia</b>	<b>Switzerland</b>	<b>Total</b>
0: Agricultural products	92.115	619.521	88.161	3.126.287	32.243	472.956	45.492	4.476.775
1: Foodstuffs	167.026	1.874.911	102.959	1.024.692	44.814	169.128	130.676	3.514.206
2: Solid mineral fuels	-	-	-	-	-	-	-	-
3: Crude oil+ Petroleum products	18.218	-	47.967	-	7.976	40.854	-	115.015
4: Ores, metal waste	-	-	-	-	-	-	-	-
5: Metal products	276.947	55.269	126.384	587.105	76.324	204.820	912	1.327.761
6: Building minerals & material	297.487	784.684	186.263	480.918	85.756	766.928	278.242	2.880.278
7: Fertilizers	1.954	-	6.280	40	-	4.170	-	12.444
8: Chemicals	375.273	1.492.224	124.756	593.160	116.836	319.335	222.575	3.244.159
9: Machinery & other manufacturing	597.136	5.043.188	683.656	1.979.175	404.723	351.314	795.792	9.854.984
<b>Total</b>	<b>1.826.156</b>	<b>9.869.797</b>	<b>1.366.426</b>	<b>7.791.377</b>	<b>768.672</b>	<b>2.329.505</b>	<b>1.473.689</b>	<b>25.425.622</b>

**Figure 2.1 Maximum level of LGVs in the Road Transport market of Austria**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 2.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
	No
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	<p>Council Directive 96/26/EC is considered in several laws and by-laws:</p> <ol style="list-style-type: none"> <li>1. Güterbeförderungsgesetz 1995, BGBl. Nr. 593/1995 zuletzt geändert durch BGBl. I Nr. 153/2006, § 27a</li> <li>2. Berufszugangs-Verordnung Güterkraftverkehr, BGBl. Nr. 221/1994 zuletzt geändert durch BGBl. II Nr. 280/2000; §§ 14, 15, 18, Anlage 3</li> <li>3. Kraftfahrliniengesetz, BGBl. Nr. I 203/1999 zuletzt geändert durch BGBl. Nr. I 153/2006</li> <li>4. Gelegenheitsverkehrs-Gesetz 1996, BGBl. Nr. 112/1996 zuletzt geändert durch BGBl. I Nr. 153/2006, § 22</li> <li>5. Berufszugangsverordnung Kraftfahrlinien- und Gelegenheitsverkehr, BGBl. Nr. 889/1994 zuletzt geändert durch BGBl. II Nr. 46/2001 §§ 18, Anlage 5 und Anlage</li> </ol> <p>Find a copy of all these documents attached. Unfortunately, we have no English translation available.</p>
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>All these regulation are dedicated to govern the access to professional transport of goods and passengers. Documents Nr. 1 and 2 in the list above do include LGV. The other ones address transport of passengers, but include vehicles below 3.5 t GVW either.</p> <p>These laws cover all kinds of vehicles used for professional transport. There is no indication within the law, why it covers all vehicles. It is likely, that there is no reason to focus on</p>

	particular categories of vehicles within these rules.
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC on Road Charging</u> introduced in your country?</b>
	<p>Council Directive 1999/62/EC is considered in several laws and by-laws:</p> <ol style="list-style-type: none"> <li>1. ASFINAG-Gesetz, BGBl. Nr. 591/1982 zuletzt geändert durch BGBl. I Nr. 82/2007, Art. 2 § 11</li> <li>2. Bundesstraßen-Mautgesetz 2002, BGBl. I Nr. 109/2002 zuletzt geändert durch BGBl. I Nr. 82/2007, §§ 7, 9, 35, 37</li> <li>3. Verwirklichung eines Eisenbahnbasistunnels auf der Brennerachse, BGBl. III Nr. 177/2006, Art. 9</li> </ol>
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<ol style="list-style-type: none"> <li>1. This law implements a company, which builds, maintains and administers the Austrian trunk road network. In return, this company is entitled to beneficial use of these roads, including collecting toll.</li> <li>The purpose of the paragraph mentioned above is explicitly to implement Directive 1999/62/EC.</li> <li>2. The purpose of this law is to regulate road charging for all vehicles.</li> <li>3. The purpose of this is to settle the arrangements between Austria and Italy concerning the construction of the Brenner Base Tunnel</li> </ol> <ol style="list-style-type: none"> <li>1. This includes LGV since it is intended to collect toll for all vehicles.</li> <li>2. This includes LGV since it is intended to collect toll for all vehicles.</li> <li>3. Austria and Italy agree to advocate road toll for particular routes and cross-financing together. This addresses only HGVs.</li> </ol>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006 on Driving Times and Rest Period</u>, and <u>Regulation (EEC) 3821/85 on the Tachograph</u>, introduced in your country?</b>
	<p>Regulation (EC) 561/2006 is considered in several laws and by-laws:</p> <ol style="list-style-type: none"> <li>1. Arbeitsruhegesetz, BGBl. Nr. 144/1983 zuletzt geändert durch BGBl. I Nr. 138/2006, §§ 22a, 22c, 27, 34</li> <li>2. Arbeitszeitgesetz, BGBl. Nr. 461/1969 zuletzt geändert durch BGBl. I Nr. 138/2006, §§ 13, 13a, 15d, 15e, 17, 24, 28 and 33</li> <li>3. Kraftfahrgesetz 1967, BGBl.Nr. 267/1967 zuletzt geändert durch BGBl. I Nr. 94/2009, §§ 102, 102a, 103b, 114, 134, 134a, 136</li> <li>4. Lenker/innen-Ausnahmereverordnung, BGBl. II Nr. 23/2008, §§ 2 and 3</li> </ol>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<ol style="list-style-type: none"> <li>1. Govern resting times for all kinds of workers (including those on the road)</li> <li>2. Govern resting times for all kinds of workers (including those on the road)</li> <li>3. This is the Austrian road vehicle law addressing technical conditions and behaviours with reference to all kinds of powered vehicles.</li> <li>4. This law statutes certain exceptions from the limits for working and resting times.</li> </ol> <ol style="list-style-type: none"> <li>1. Yes, this does not only address workers on the road, all kinds of vehicles, in particular those with reference to (EC) 561/2006</li> <li>2. Yes, this does not only address workers on the road, all kinds of vehicles, in particular those with reference to (EC) 561/2006</li> <li>3. This covers all motorised vehicle, since it is the core purpose of this law to do so.</li> </ol>

	4. This by-law particularly implements exceptions mandated by Regulation (EC) 561/2006.
<b>8</b>	<p><b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b></p> <p>There are a couple of arguments to consider:</p> <ol style="list-style-type: none"> <li>1. These vehicles are highly motorised, able to exceed legal speed limits on highways by far. Accident numbers indicate, that this is not only possible, but also practically done by the drivers of these vehicles, which creates a serious road safety problem in at least some European countries.</li> <li>2. LGV is frequently downsized to 3,500 kg. Hence, their technical capacity is much higher, which encourages breach in terms of exceeding the legal limit for payload.</li> <li>3. Since personal costs are a major issue and still far lower in the eastern parts of the European Union and beyond its borders, lack of particular rules for LGVs (like weekend ban, night time driving regulations, etc) statute an invitation to divide larger loads to small pieces and ship them over the weekend with much higher speed including additional risk to the drivers of these vehicles and other road users.</li> <li>4. LGV is excluded from toll regulations depending on mileage. Hence, the principle of "pay as you drive", which is applied for HGVs, is corrupted by the use of LGVs instead.</li> <li>5. It is possible, that drivers, which during the week are driving HGVs, continue their work over the weekend with LGVs uncontrolled, which endangers the purpose of limiting driving and resting times. Hence, competition is unfair between companies which encourage their drivers to do that compared to companies, which respect the purpose of limits to driving and resting hours.</li> </ol> <p>Hence, LGV traffic - if they are operated as an alternative for HGV to avoid restrictions in terms of driving and resting hours and to avoid road toll, have to be considered an issue of unfair competition.</p>
<b>9</b>	<p><b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b></p> <p>There are two issues:</p> <p>On the one hand, measures need to be taken in order to avoid LGV traffic as a replacement for HGV, if this is done with the intention to avoid regulations for driving and resting times as well as to avoid road toll. In principle, all other transport than the exception already existing for HGV, could be applied on commercial LGV transport as well.</p> <p>.On the other hand, vehicle measures should be implemented to avoid the additional risk exerted by LGV. Speed limiters have been under discussion already. But there is also a large need for enforcement of existing rules. In particular compliance to speed limits and weight limits are important.</p> <p>Measures should be taken to avoid infringement of driving and resting time regulations for the sake of the drivers' health and road safety.</p> <p>Free traffic of LGV also alleviates bricolage.</p> <p>However, non-commercial transport should not be cumbered.</p>





## BE: Belgium

1. Some general (road transport related) figures.

**Table 3.1 General data**

	Quantity
Area	30,5 thousand km <sup>2</sup>
Population	10,75 million (2009)
GDP	€ 344,0 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 3.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	1.763	2005
"Production" (mln tonkms)	16.265	2007
Goods vehicles (active fleet )	642.687	2007
< 3 tonne MLC	missing	
3-7 tonne MLC	missing	
> 7 tonne MLC	missing	

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

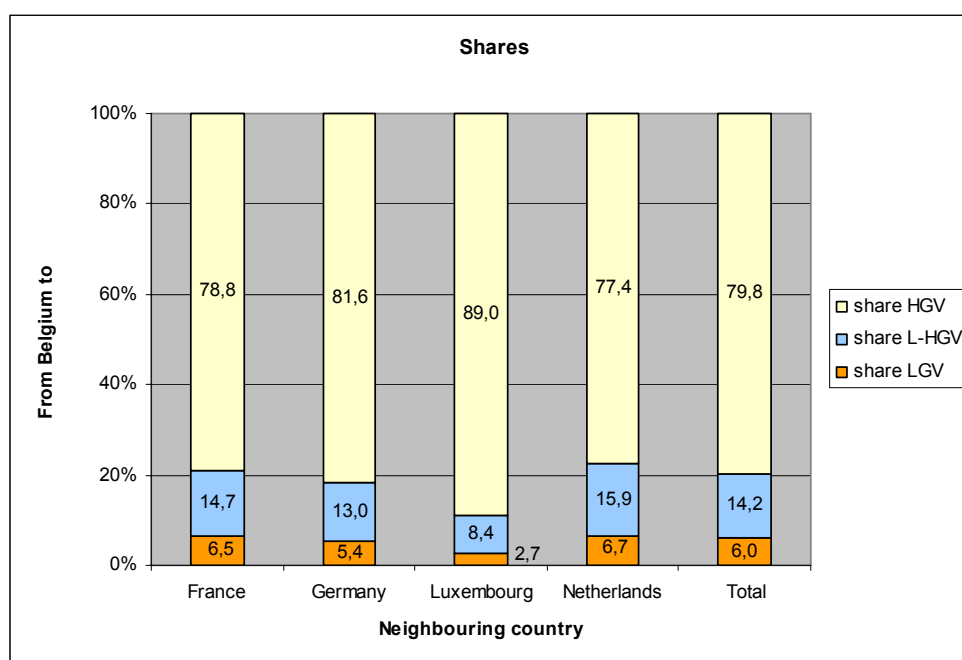
Table: road\_eqs\_lorlum

## 2. Share of LGVs (NSTR1 classification)

**Table 3.3 Bilateral road transport from Belgium to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	France	Germany	Luxembourg	Netherlands	Total
0: Agricultural products	1.521.084	620.534	290.621	239.909	2.672.148
1: Foodstuffs	4.182.518	2.110.944	259.320	3.111.951	9.664.733
2: Solid mineral fuels	-	-	-	-	-
3: Crude oil+ Petroleum products	-	1.452	-	-	1.452
4: Ores, metal waste	-	-	-	-	-
5: Metal products	105.367	56.774	2.028	-	164.169
6: Building minerals & material	1.720.659	172.001	984.360	15.009	2.892.029
7: Fertilizers	-	-	-	-	-
8: Chemicals	4.301.359	4.088.778	190.184	457.864	9.038.185
9: Machinery & other manufacturing	10.542.548	4.385.162	371.287	3.701.256	19.000.253
Total	22.373.535	11.435.645	2.097.800	7.525.989	43.432.969

**Figure 3.1 Maximum level of LGVs in the Road Transport market of Belgium  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)**



3. Results of the questionnaire on legislation.

**Table 3.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	No
FEBETRA	No, but we think it may be a good thing to do as LGV can evade legislation for vehicles with more than 3.5 tonnes.
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Law of 3 May 1999 regarding road transport of goods, implemented by Royal Decision of 7 May 2002 and Ministerial Decision of 8 May 2002
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>Law of 3 May 1999 regarding road transport of goods:</p> <p>La loi est d'application</p> <ol style="list-style-type: none"> <li>1. à tout transport rémunéré de choses par route, au moyen d'un véhicule ou d'un train de véhicules,</li> <li>2. à tout déplacement à vide d'un véhicule ou d'un train de véhicules, effectué par route, en relation avec un transport visé au 1°</li> <li>3. au transport de choses par route effectué pour compte propre, au moyen d'un véhicule ou d'un train de véhicules dans les déterminés à l'article 22, §1<sup>er</sup> 2°b</li> </ol> <p>De plus l'arrêté royal du 30.05.2002 stipule e.a. que le présent arrêté n'est pas applicable aux transports de choses effectués au moyen d'un véhicule automobile ou d'un train de véhicules <b>dont la charge utile n'excède pas 500 kg.</b></p>
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Loi du 13 mars 2001 portant assentiment du Protocole modifiant l'Accord du 9 février 1994 relatif à la perception d'un droit d'usage pour l'utilisation de certaines routes par des véhicules utilitaires lourds, vu la mise en vigueur de la Directive 1999/62/CE du Parlement européen et du Conseil de l'Union européenne du 17 juin 1999 relative à la taxation des poids lourds pour l'utilisation de certaines infrastructures, signé à Bruxelles le 22 mars 2000, entre les gouvernements du Royaume de Belgique, du Royaume du Danemark, de la République fédérale d'Allemagne, du Grand-Duché de Luxembourg, du Royaume des Pays-Bas et du Royaume de Suède, et modifiant la loi du 27 décembre 1994 portant assentiment de l'Accord précité et instaurant une Eurovignette, conformément à la Directive 93/89/CEE du Conseil des Communautés européennes du 25 octobre 1993.
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Sont assujettis à l'eurovignette les véhicules à moteur et les ensembles de véhicules destinés exclusivement au transport de marchandises par route, dont la masse maximale autorisée s'élève à au moins 12 tonnes.
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	Arrêté royal du 14 juillet 2005 portant exécution du règlement (CEE) n° 3821/85

	<p>du 20 décembre 1985 concernant l'appareil de contrôle dans le domaine des transports par route.</p> <p>Arrêté royal du 9 avril 2007 portant exécution du règlement (CE) n° 561/2006 relatif à l'harmonisation de certaines dispositions de la législation sociale dans le domaine des transports par route, modifiant les règlements (CEE) n°3821/85 et (CE) n° 2135/98 du Conseil et abrogeant le règlement (CEE) n° 3820/85 du Conseil.</p>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Le règlement est d'application aux transports par route de marchandises par des véhicules (y compris des véhicules à remorque ou à semi-remorque) dont la masse maximale autorisée dépasse 3,5 tonnes.
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
MIN	Yes, as far as these vehicles do not have to respect certain legislation, like Eurovignet and driving times and rest periods. In case of the last issue this can even have consequences for road safety. In Belgium we see a growing number of accidents with LGVs.
FEBETRA	Vu que la réglementation d'application aux véhicules de plus de 3,5 tonnes devient de plus en plus stricte et rigide, l'attrait des véhicules de moins de 3,5 tonnes devient de plus en plus grand. De plus, étant donné les petites distances à parcourir en Belgique, il est très facile de faire de l'international au moyen d'utilitaires légers. N'oublions pas non plus que, contrairement aux véhicules lourds, les véhicules légers à destination de la Belgique peuvent circuler en toute quiétude le week-end en France et en Allemagne, où ils ne sont pas frappés par les interdictions de circuler. Certaines des réglementations mentionnées ci-dessus ont été instaurées non seulement d'un point de vue de concurrence mais également pour des raisons de sécurité routière.
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
MIN	Yes

#### Remarks:

Contact information:

Organisation	Contactperson	Address	Telno.
FOD Mobiliteit en Vervoer – Directie wegvervoer.	Dominique Steyvers	<a href="mailto:Dominique.steyvers@mobilit.fgov.be">Dominique.steyvers@mobilit.fgov.be</a>	
FEBETRA	Isabelle De Maegt		

## BG: Bulgaria

1. Some general (road transport related) figures.

**Table 4.1 General data**

	Quantity
Area	110,9 thousand km <sup>2</sup>
Population	7,61 million (2009)
GDP	€ 19.5 billion (2004)

Source: Eurostat Table: tps00001; teina010

**Table 4.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	418	2007
"Production" (mln tonkms)	5.786	2007
Goods vehicles (active fleet )	239.769	2004
< 3 tonne MLC	missing	
3-7 tonne MLC	missing	
> 7 tonne MLC	missing	

MLC= Maximum Loading Capacity

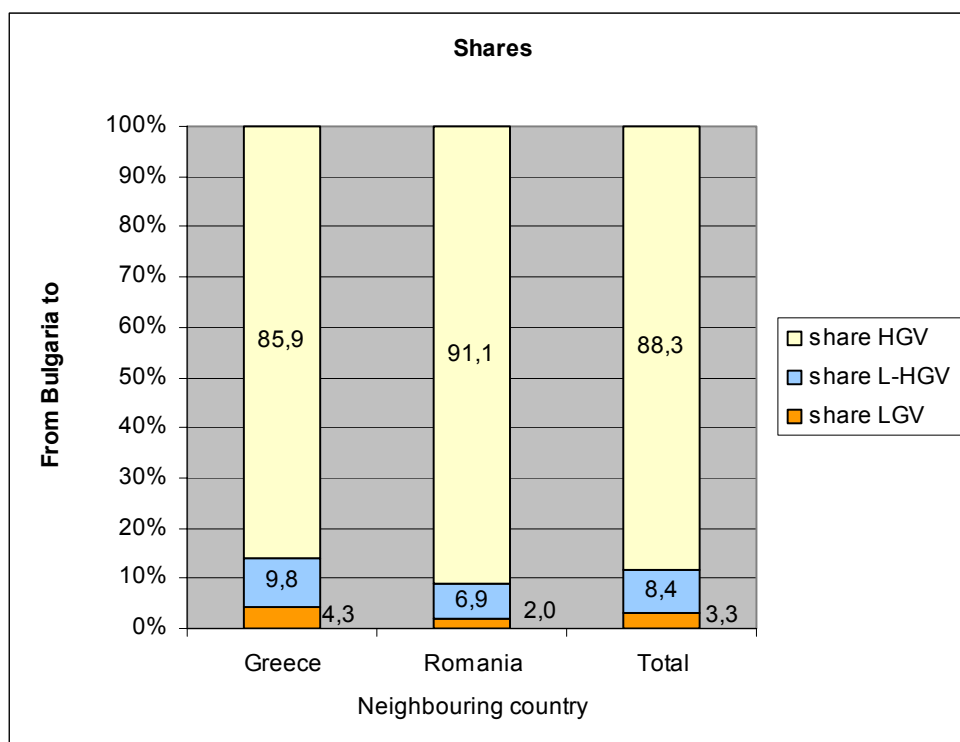
Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;  
Table: road\_eqs\_lorlum

2. Share of LGVs (NSTR1 classification)

**Table 4.3 Bilateral road transport from Bulgaria to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Greece	Romania	Total
0: Agricultural products	350.296	81.835	432.131
1: Foodstuffs	74.707	62.571	137.278
2: Solid mineral fuels	-	439	439
3: Crude oil+ Petroleum products	63.546	36.533	100.079
4: Ores, metal waste	27.638	59	27.697
5: Metal products	150.744	121.456	272.200
6: Building minerals & material	36.559	423.573	460.132
7: Fertilizers	599	256	855
8: Chemicals	81.408	153.990	235.398
9: Machinery & other manufacturing	363.428	120.590	484.018
Total	1.148.925	1.001.302	2.150.227

**Figure 4.1 Maximum level of LGVs in the Road Transport market of Bulgaria (Share based on number of tonnes and product value per kilogram; year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 4.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	The Republic of Bulgaria has a specific policy and legislation about the international transport of goods by light goods vehicles only in the area of charging of vehicles for the use of road infrastructure.
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	The requirements of Directive 96/26/EC are introduced in the Bulgarian legislation with Road Transport Law ( <i>Promulgated State Gazette 82/17 Sep 1999, last amend. SG. 102/28 November 2008</i> ) and Ordinance № 11 of 31 October 2002 on international carriage of passengers and goods by road.
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
AEBTRI	"This law shall provide the conditions and the order for: 1. the domestic and international transport for hire and reward of passengers and cargo by vehicles, carried out by Bulgarian or foreign carriers; 2. the transport for own account;

	<p>3. the control at implementing of the transport of items 1 and 2;</p> <p>4. the special rules of the contracts for transport of passengers and cargo"</p> <p>Transport with LGVs is included only when for such transport permission is required under international agreements, to which the Republic of Bulgaria is a party.</p>
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
MIN	The requirements of Directive 1999/62/EC are introduced in the Bulgarian legislation with Roads Law and Ordinance for the conditions and the order for charging for the use of the road infrastructure, for travelling a given distance, for the use of certain appurtenances on the republican roads and for the special use of the republican roads or on parts of them.
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
AEBTRI	<p>"This Act shall regulate public relations in respect to ownership, use, management, construction, repair, maintenance and funding of roads in Bulgaria."</p> <p>This Act includes also LGVs, because a vignette charging system for all road vehicles with Bulgarian and foreign registration using the Bulgarian road network for certain periods of time has been implemented.</p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
MIN	The requirements of Regulation (EC) № 561/2006 and Regulation (EEC) № 3821/85 are introduced in the Bulgarian legislation with Ordinance № H-3 of 7 April 2009 on the necessary measures for the implementation and enforcement of Regulation (EEC) № 3821/85 and Regulation (EC) № 561/2006.
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
AEBTRI	<p>"This law shall provide the conditions and the order for:</p> <ol style="list-style-type: none"> <li>1. the domestic and international transport for hire and reward of passengers and cargo by vehicles, carried out by Bulgarian or foreign carriers;</li> <li>2. the transport for own account;</li> <li>3. the control at implementing of the transport of items 1 and 2;</li> <li>4. the special rules of the contracts for transport of passengers and cargo"</li> </ol> <p>LGVs are not included in the context of the provisions of Regulation (EC) 561/2006 and Regulation (EEC) 3821/85.</p>
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
MIN	No, we don't regard international transport of goods by light goods vehicles as a serious issue

AEBTRI	Yes, on our opinion the international freight transport by LGVs causes unfair competition and should be regulated.
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	No, we don't consider that is necessary additional legislation about the transport of goods by light goods vehicles.

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
Vehicles Directorate Executive Agency Road Transport Administration Ministry of Transport, Information Technologies and Communications Republic of Bulgaria	Ivaylo Slaveykov		
AEBTRI	Antonia Atanassova		tel.: +359 2 9581056, fax: +359 2 9581259 e-mail: <a href="mailto:a_atanassova@aeetri.com">a_atanassova@aeetri.com</a>



## CY: Cyprus

### 1. Some general (road transport related) figures.

**Table 5.1 General data**

	Quantity
Area	9,3 thousand km <sup>2</sup>
Population	0,8 million (2009)
GDP	€ 17,3 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 5.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	276	2004
"Production" (mln tonkms)	12	2007
Goods vehicles (active fleet )	116.797	2004
< 3 tonne MLC	107.398	2004
3-7 tonne MLC	5.127	2004
> 7 tonne MLC	4.272	2004

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

As Cyprus is an island, and, although it can be reached by freight vehicles using ferries, it has been excluded from this study.

### 4. Results of the questionnaire on legislation.

**Table 5.3 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	NO.
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	The access to the road haulage occupation Law of 2001 to 2009 [101(I)/2001, 15(I)/2009, 101(I)/2009] (only in Greek – hard copy)
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	NO. To regulate and control the operation of undertakings engaging in the road transport of goods or passengers

<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	The charging of heavy goods vehicles for the use of certain infrastructures Law of 2009 [Law 19(I)/2009]
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	NO.
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	The Control of Working and Resting Times of Drivers of Certain Vehicles Law of 2007 (Law 86(I)/2007) See attachment in Greek.
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	NO.
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	NO.
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	NO.

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
Department of Labour Inspection Ministry of Labour and Social Insu	Andreas Savva Labour Inspection Officer		

## CZ: Czech Republic

### 1. Some general (road transport related) figures.

**Table 6.1 General data**

	Quantity
Area	78,9 thousand km <sup>2</sup>
Population	10,5 million (2009)
GDP	€ 147,8 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 6.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	657	2007
"Production" (mln tonkms)	25.123	2007
Goods vehicles (active fleet )	533.916	2007
< 3 tonne MLC	456.657	2007
3-7 tonne MLC	33.293	2007
> 7 tonne MLC	43.966	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

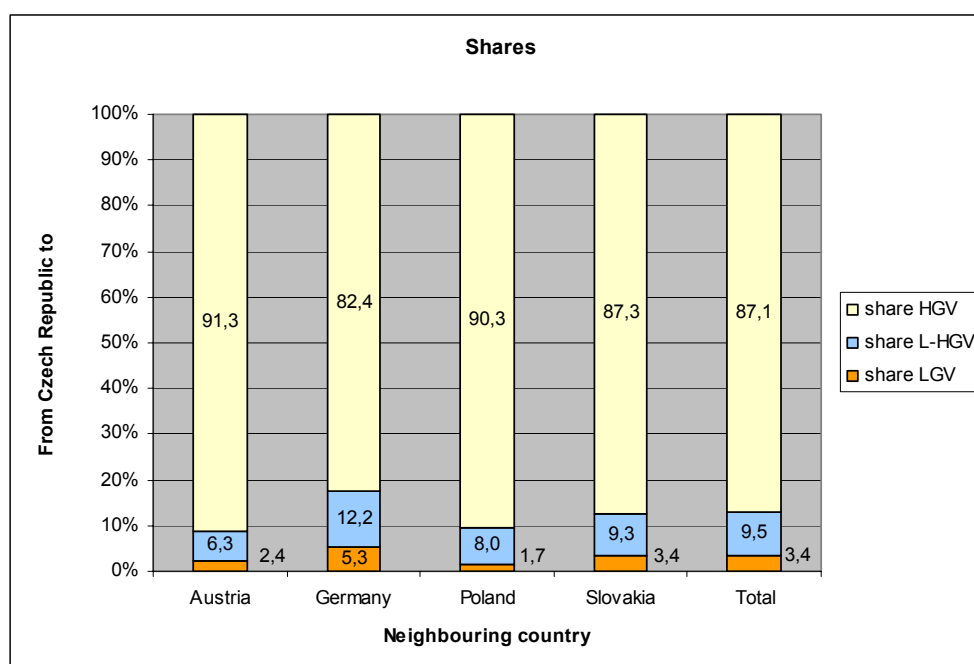
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 6.3 Bilateral road transport from Czech Republic to the neighbouring countries (Number of tonnes x1000; year= 2007)**

NSTR	Austria	Germany	Poland	Slovakia	Total
0: Agricultural products	2.143.351	1.628.761	438.929	298.068	4.509.109
1: Foodstuffs	176.990	1.441.004	4.634.333	741.749	6.994.076
2: Solid mineral fuels	-	-	-	-	-
3: Crude oil+ Petroleum products	4.135	7.789	162.005	419.339	593.268
4: Ores, metal waste	-	145	23.337	28.531	52.013
5: Metal products	184.480	1.033.791	784.279	595.058	2.597.608
6: Building minerals & material	707.708	730.442	891.326	953.564	3.283.040
7: Fertilizers	2.575	19.082	34.483	49.869	106.009
8: Chemicals	310.639	1.175.636	620.100	630.609	2.736.984
9: Machinery & other manufacturing	711.658	3.842.216	786.872	1.099.617	6.440.363
Total	4.241.536	9.878.866	8.375.664	4.816.404	27.312.470

**Figure 6.1 Maximum level of LGVs in the Road Transport market of Czech Republic (Share based on number of tonnes and product value per kilogram; year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 6.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	Czech Republic does not have any specific legislation to address transport by LGVs. As such vehicles do not present such jeopardy for road safety, and specific LGV legislation would mean superfluous burden for entrepreneurs, we don't feel necessity to produce additional legislation on this issue.
<b>2</b>	<b>By which law is Council Directive 96/26/EC on admission to the occupation of road haulage operator introduced in your country?</b>
	The above mentioned Directive is in our country introduced by these legal regulations: a) Act. No. 111/1994 Coll., Road Transport Act b) Act. No. 455/1991 Coll., Commercial Activity Act c) Order No. 366/1999 Coll., on methods of proving of the financial capacity
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	a) conditions of operating the road transport by motor vehicles, rights and duties of subjects involved and competence of state administration bodies b) conditions of commercial activities and secure compliance with laws c) methods of proving of the financial capacity, procedure of emitting the written confirmation of financial capacity and requirements of such confirmation

	Note: Question of LGVs is not directly subject to these acts, nonetheless this field is covered to some extent. For example Act No. 111/1994 Coll. regulates all motor vehicles in the field of road transport, but assigns no obligations to vehicles up to 3,5 tonnes of weight.
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Act No. 13/1997 Coll., on Road Network <sup>14</sup>
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Categorisation of communications, its construction, conditions of use, protection, right and obligations of its owners and exercising of public administration by authorised bodies.  It does include LGVs as it imposes obligation of time-dependent road user charges for vehicles up to 3,5 tonnes of weight.
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	Act. No. 111/1994 Coll., Road Transport Act Order No. 341/2002 Coll., on confirmation of roadworthiness and technical conditions of operating the vehicles on roads (Act. No. 56/2001 Coll., on conditions of operating the vehicles on roads)
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	See Question 3.
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	We don't expect LGVs to be able to seriously distort competition.
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	Legislative action is not considered necessary.

**Remarks:**

<sup>14</sup> Segments of motorways and high-speed roads marked with a road sign as a motorway or a road for motor vehicles, which are subject to a toll, are specified in Annex no. 2 to the Regulation of the Ministry of Transport and Communication no. 527/2006 Coll., Implementing the Act on the Road Network, as amended.

Exceptions from the obligation to pay a fee or toll for the use of motorways and high-speed roads, and their segments, by motor vehicles are enumerated in Act no. 13/1997 Coll., On the Road Network, as amended.

The fees for the use of motorways and high-speed roads by road motor vehicles are set by the Government Directive no. 484/2006 Coll., which came into effect on January 2007..

Contact information:

Organisation	Contactperson	Adress	Telno.
Ministry of Transport of the Czech Republic, Freight Transport and State Supervision Division	Jan Vystrčil		<a href="mailto:jan.vystrcil@mdcr.cz">jan.vystrcil@mdcr.cz</a>

## DK: Denmark

### 1. Some general (road transport related) figures.

**Table 7.1 General data**

	Quantity
Area	43,1 thousand km <sup>2</sup>
Population	5,5 million (2009)
GDP	€ 232,5 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 7.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	1.010	1998
"Production" (mln tonkms)	8.252	2007
Goods vehicles (active fleet )	389.362	2001
< 3 tonne MLC	359.118	2001
3-7 tonne MLC	9.662	2001
> 7 tonne MLC	20.582	2001

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

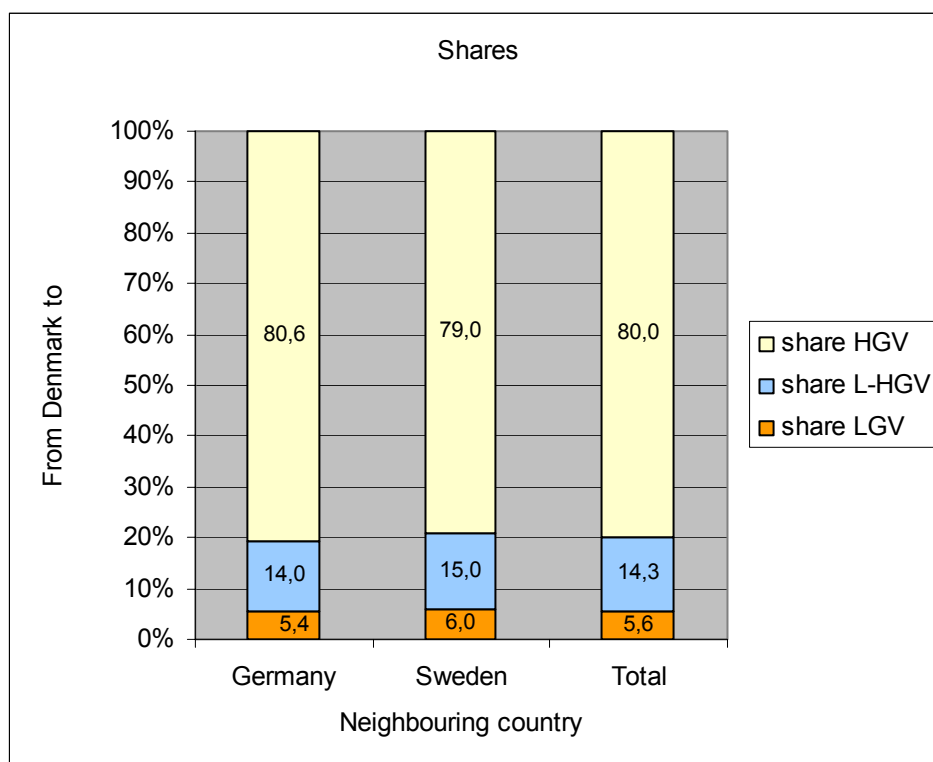
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 7.3 Bilateral road transport from Denmark to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Germany	Sweden	Total
0: Agricultural products	119.264	34.836	154.100
1: Foodstuffs	1.355.123	625.351	1.980.474
2: Solid mineral fuels	-	-	-
3: Crude oil+ Petroleum products	37	100	137
4: Ores, metal waste	-	-	-
5: Metal products	163	3.140	3.303
6: Building minerals & material	-	15.260	15.260
7: Fertilizers	-	-	-
8: Chemicals	304.992	128.371	433.363
9: Machinery & other manufacturing	1.136.357	633.857	1.770.214
Total	2.915.936	1.440.915	4.356.851

**Figure 7.1 Maximum level of LGVs in the Road Transport market of Denmark**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



3. Results of the questionnaire on legislation.

**Table 7.4 Results of the questionnaire**

*NO RESPONSE*

**Remarks:**



## EE: Estonia

### 1. Some general (road transport related) figures.

**Table 8.1 General data**

	Quantity
Area	45,2 thousand km <sup>2</sup>
Population	1,3 million (2009)
GDP	€ 16,1 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 8.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	96	2007
"Production" (mln tonkms)	3.963	2007
Goods vehicles (active fleet )	80.280	2007
< 3 tonne MLC	51.926	2007
3-7 tonne MLC	8.220	2007
> 7 tonne MLC	20.134	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

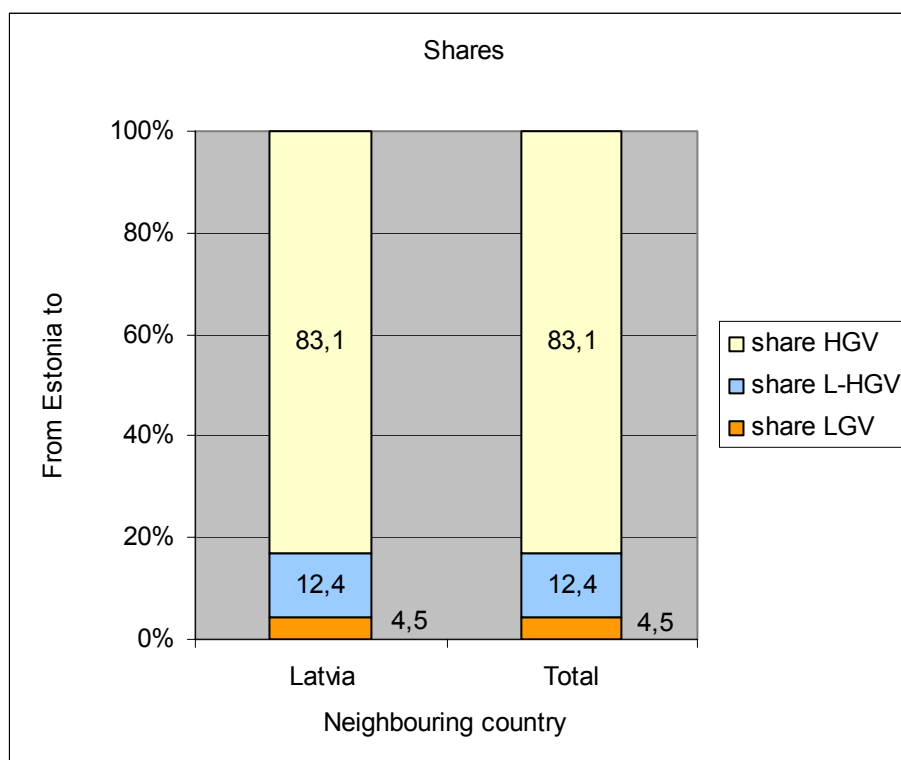
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 8.3 Bilateral road transport from Estonia to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Latvia	Total
0: Agricultural products	9.412	9.412
1: Foodstuffs	163.376	163.376
2: Solid mineral fuels	87	87
3: Crude oil+ Petroleum products	6.037	6.037
4: Ores, metal waste	170	170
5: Metal products	4.595	4.595
6: Building minerals & material	59.699	59.699
7: Fertilizers	-	-
8: Chemicals	46.600	46.600
9: Machinery & other manufacturing	134.255	134.255
Total	424.231	424.231

**Figure 8.1 Maximum level of LGVs in the Road Transport market of Estonia**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 8.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
	No, not necessary
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Road Transport Act (RT I 2000, 54, 346) entered into force 1.10.2000
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	This act applies only to vehicles with gross weight over 3,5 tonnes (§3, p.(1))
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Heavy vehicle taxation act (RT I 2000, 81, 515), entered into force 1.1.2003
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	This act applies only to vehicles with gross weight over 12 tonnes.

<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006 on Driving Times and Rest Period</u>, and <u>Regulation (EEC) 3821/85 on the Tachograph</u>, introduced in your country?</b>
	No laws in Estonian legislation, these Regulations apply directly and no national legislation is necessary.
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	As written in Regulations.
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	No
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	No

**Remarks:**

Contact information:

<b>Organisation</b>	<b>Contactperson</b>	<b>Address</b>	<b>Telno.</b>
Road and Railways Department Ministry of Economic Affairs and Communications	Jaak Ideon		<a href="mailto:Jaak.Ideon@mkm.ee">Jaak.Ideon@mkm.ee</a>
ERAA, Estonia	Ermo Perolainen, Head of Information Department		<a href="mailto:ermo@eraa.ee">ermo@eraa.ee</a>



## FI: Finland

### 1. Some general (road transport related) figures.

**Table 9.1 General data**

	Quantity
Area	338,1 thousand km <sup>2</sup>
Population	5,3 million (2009)
GDP	€ 184,7 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 9.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	700	2007
"Production" (mln tonkms)	2.108	2007
Goods vehicles (active fleet )	390.530	2007
< 3 tonne MLC	333.181	2007
3-7 tonne MLC	12.150	2007
> 7 tonne MLC	45.199	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

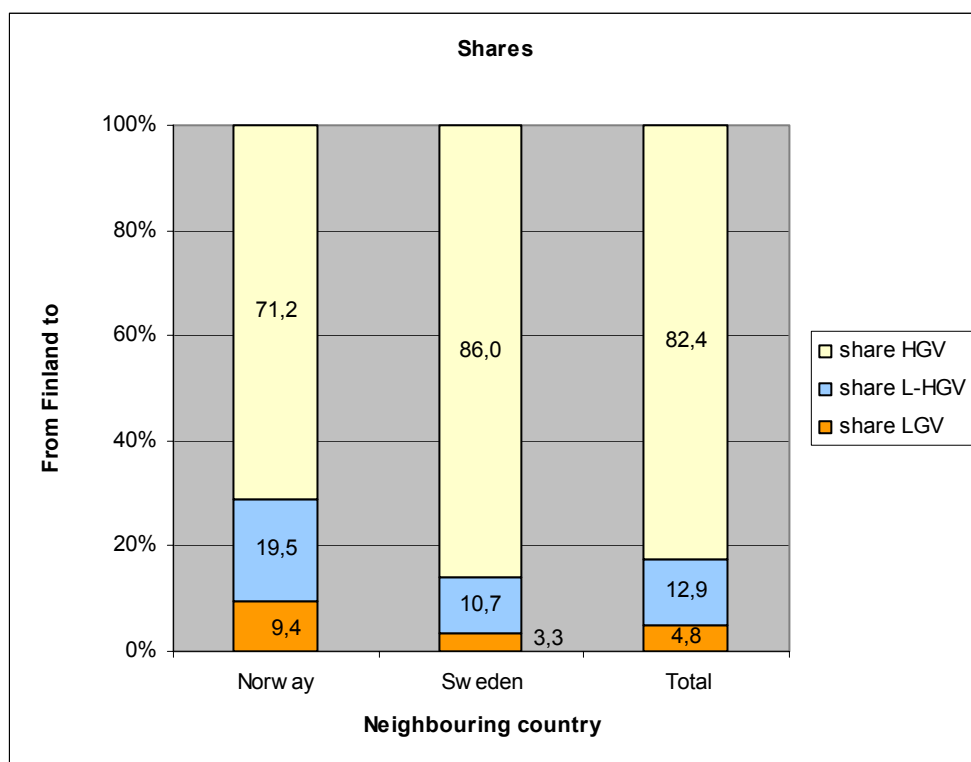
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 9.3 Bilateral road transport from Finland to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Norway	Sweden	Total
0: Agricultural products	-	16.601	16.601
1: Foodstuffs	9.628	160.426	170.054
2: Solid mineral fuels	274	-	274
3: Crude oil+ Petroleum products	13.633	64.300	77.933
4: Ores, metal waste	-	-	-
5: Metal products	-	-	-
6: Building minerals & material	6.966	1.499	8.465
7: Fertilizers	-	-	-
8: Chemicals	-	8.064	8.064
9: Machinery & other manufacturing	74.567	71.585	146.152
Total	105.068	322.475	427.543

**Figure 9.1 Maximum level of LGVs in the Road Transport market of Finland**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



3. Results of the questionnaire on legislation.

**Table 9.4 Results of the questionnaire**

**NO RESPONSE**

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
<Name>	0		

## FR: France

### 1. Some general (road transport related) figures.

**Table 10.1 General data**

	Quantity
Area	632,8 thousand km <sup>2</sup>
Population	64,4 million (2009)
GDP	€ 1.948,0 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 10.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	10.800	2004
"Production" (mln tonkms)	23.466	2007
Goods vehicles (active fleet )	5.417.503	2004
< 3 tonne MLC	5.095.473	2004
3-7 tonne MLC	116.559	2004
> 7 tonne MLC	205.471	2004

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

Table: road\_eqs\_lorlum

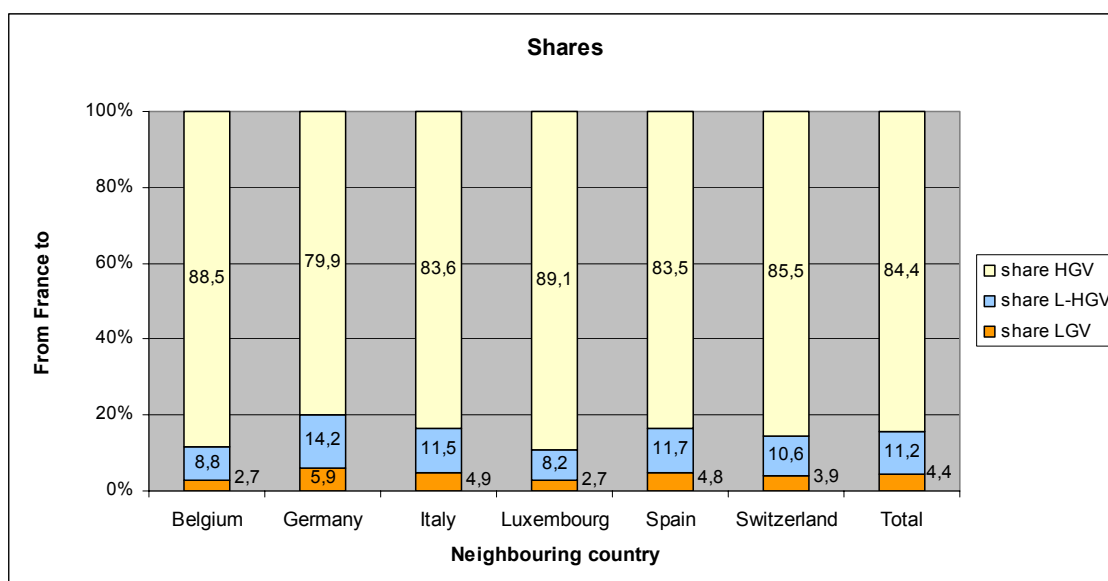
2. Share of LGVs (NSTR1 classification)

**Table 10.3 Bilateral road transport from France to the neighbouring countries (Number of tonnes x1000; year= 2007)**

<b>NSTR</b>	<b>Belgium</b>	<b>Germany</b>	<b>Italy</b>	<b>Luxembourg</b>	<b>Spain</b>	<b>Switzerland</b>	<b>Total</b>
0: Agricultural products	4.651.588	770.415	3.353.529	243.784	2.080.111	341.760	11.441.187
1: Foodstuffs	6.719.079	4.101.663	1.989.966	146.933	2.681.714	819.200	16.458.555
2: Solid mineral fuels	-	-	-	-	-	-	-
3: Crude oil+ Petroleum products	-	5.003	16.673	-	24.212	937	46.825
4: Ores, metal waste	-	1.913	-	-	19.628	23	21.564
5: Metal products	56.130	10.357	330.511	19.742	971.388	1.878	1.390.006
6: Building minerals & material	308.605	558.130	707.742	850.170	169.273	1.842.353	4.436.273
7: Fertilizers	-	-	-	-	7.360	-	7.360
8: Chemicals	2.125.106	2.177.638	2.616.208	191.853	1.631.055	593.670	9.335.530
9: Machinery & other manufacturing	3.124.390	5.699.079	4.987.501	315.181	4.047.075	1.337.503	19.510.729
<b>Total</b>	<b>16.984.898</b>	<b>13.324.198</b>	<b>14.002.130</b>	<b>1.767.663</b>	<b>11.631.816</b>	<b>4.937.324</b>	<b>62.648.029</b>



**Figure 10.1 Maximum level of LGVs in the Road Transport market of France**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 10.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	<p>Il n'y a pas de législation spécifique permettant de traiter en France le transport international de marchandises par véhicules légers. La réglementation concernant le transport léger, introduite en France en 1998 (loi du 6 février 1998) et 1999 (décret du 30 août 1999) ne s'applique qu'aux entreprises établies en France effectuant du transport routier de marchandises avec des véhicules de moins de 3,5 tonnes.</p> <p>Les entreprises établies en France qui utilisent des véhicules légers doivent être inscrites au registre des transporteurs en satisfaisant aux trois conditions d'accès à la profession : honorabilité professionnelle, capacité financière et capacité professionnelle. Les conditions de capacités financière et professionnelle sont allégées (900 € par véhicule ; justificatif de capacité professionnelle obtenu après validation d'un stage de 10 jours).</p>
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	<p>- Loi n° 82-1153 du 30 décembre 1982 modifiée d'orientation des transports intérieurs (LOTI) : <a href="http://legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000319738&amp;fastPos=1&amp;fastReqId=1535056135&amp;categorieLien=cid&amp;oldAction=rechTexte">http://legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000319738&amp;fastPos=1&amp;fastReqId=1535056135&amp;categorieLien=cid&amp;oldAction=rechTexte</a></p> <p>- Décret n° 99-752 du 30 août 1999 modifié relatif aux transports routiers de marchandises : <a href="http://legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000198352&amp;fastPos=1&amp;fastReqId=323468318&amp;categorieLien=cid&amp;oldAction=rechTexte">http://legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000000198352&amp;fastPos=1&amp;fastReqId=323468318&amp;categorieLien=cid&amp;oldAction=rechTexte</a></p>

<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>La réglementation des transports est applicable aux entreprises établies en France.</p> <p>- Loi du 30 décembre 1982 : voir l'article 8-I  - Décret du 30 août 1999 : voir l'article 1<sup>er</sup></p> <p>L'article 36 de la LOTI instaure une licence de transport intérieur pour les entreprises qui utilisent des véhicules légers. Sont concernés tous les véhicules motorisés n'excédant pas 6 tonnes y compris les deux roues.</p> <p>Les article 3 et 4-III du décret du 30 août 1999 prévoient des conditions spécifiques d'accès et d'exercice de la profession pour les entreprises de transport léger.</p>
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	<p>Les textes qui en droit français transposent la directive 1999/62 sont les suivants :</p> <p>- articles L.122-4-1 et L.153-4-1 du code de la voirie routière (partie législative), relatifs aux péages des véhicules de transport de marchandises ;  - décret n° 2008-411 du 29 avril 2008 limitant les réductions tarifaires sur les péages routiers.</p>
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>La directive 1999/62 ne concernant pas les véhicules de moins de 3,5 tonnes, les dispositions de cette législation ne s'appliquent pas aux véhicules légers. La réglementation nationale fixe les principes de la tarification des véhicules légers dans le cadre du régime de concession. Les textes de transposition de la directive s'appliquent aux véhicules à moteur ou ensembles de véhicules couplés destinés exclusivement au transport de marchandises par route, et ayant un poids total en charge autorisé égal ou supérieur à 12 tonnes.</p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	<p>Les règlements sont d'application directe, aucune loi ou règlement ne prévoit leur transposition en droit français.</p> <p>Les principaux textes réglementaires qui précisent les modalités de mise en oeuvre de la réglementation sociale européenne sont les suivants :</p> <ul style="list-style-type: none"> <li>— sanctions : ordonnance n°58-1310 du 23 décembre 1958, décret n°86-1130 du 17 octobre 1986 ;</li> <li>— téléchargement des données de conduite : arrêté du 6 juillet 2005 (NOR : EQU0500817A) ;</li> <li>— modalités de contrôle technique du chronotachygraphe : arrêté du 7 juillet 2004 (NOR: INDI0403325A) ;</li> <li>— dérogations nationales : décret no 2008-418 du 30 avril 2008 ;</li> <li>— <u>dérogation à l'obligation d'utilisation du chronotachygraphe pour les véhicules circulant exclusivement sur des îles dont la superficie ne dépasse pas 400 km2 et qui ne sont pas reliées au reste du territoire national par un pont, un quai ou un tunnel ouverts aux véhicules automobiles : décret n°2008-842 du 25 août 2008</u> modifiant le décret n°2008-418 du 30 avril 2008 ;</li> </ul>

	<p>– <u>nombre de journées contrôlées au titre de la réglementation sociale européenne dans le domaine des transports par route : arrêté du 28 janvier 2008.</u></p> <p>–</p>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>Voir point 6.</p> <p>Les véhicules légers n'entrent pas dans le champ de la réglementation sociale européenne.</p>
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	<p>Le transport routier international de marchandises par des véhicules légers peut constituer dans certaines situations une concurrence déloyale pour le transport régulier de marchandises par poids lourds ; en effet, ce dernier est soumis à des contraintes réglementaires bien plus importantes. Cette absence de réglementation peut conduire à favoriser l'utilisation de véhicules de moins de 3,5 tonnes au lieu de véhicules lourds de moins de 12 tonnes. Sur ce secteur, la concurrence des véhicules de moins de 3,5 tonnes est sensible.</p>
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	<p>Afin d'harmoniser les règles applicables au transport de marchandises, il pourrait être examiné l'extension de certaines parties de la réglementation applicable au transport routier de marchandises, au transport routier international de marchandises par des véhicules légers. Cette harmonisation devrait concerner, dans un premier temps, l'accès à la profession et l'accès au marché. Une telle évolution permettrait d'assurer un meilleur suivi de ce secteur dans toutes ses composantes et permettre un meilleur contrôle de l'activité des entreprises.</p> <p>S'agissant de la question des temps de conduite et de repos, une analyse préalable est nécessaire.</p> <p>Cette réflexion devrait prendre en compte :</p> <ul style="list-style-type: none"> <li>– le fait que les véhicules de moins de 3,5 tonnes effectuant du transport routier de marchandises représentent une très faible part du parc de véhicules utilitaires légers and circulation (1 % en France) ;</li> <li>– la tendance des constructeurs à proposer des véhicules immatriculés avec un poids total autorisé en charge (PTAC) de moins de 3,5 tonnes et un poids à vide proche de 3 tonnes, ce qui conduit à constater de fréquentes surcharges de ces véhicules, posant un problème de sécurité. Les pratiques des transporteurs, qui visent à s'affranchir des règles applicables aux véhicules de moins de 3,5 tonnes, concernant notamment les limitations de vitesse, devraient être mieux encadrées.</li> </ul>

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
l'organisation des transports routiers de marchandises (TR1) à la sous-direction des transports routiers (TR), direction des services de transport (DST), direction générale des infrastructures, des transports et de la mer (DGITM).	M. Arnaud MATHIEU, chef du bureau		arnaud.mathieu@developpement-durable.gouv.fr

## DE: Germany

### 1. Some general (road transport related) figures.

**Table 11.1 General data**

	Quantity
Area	357,1 thousand km <sup>2</sup>
Population	82,0 million (2009)
GDP	€ 2.492,3 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 11.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	12.594	2007
"Production" (mln tonkms)	65.614	2007
Goods vehicles (active fleet )	2.323.064	2007
< 3 tonne MLC	1.988.119	2007
3-7 tonne MLC	153.379	2007
> 7 tonne MLC	181.566	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

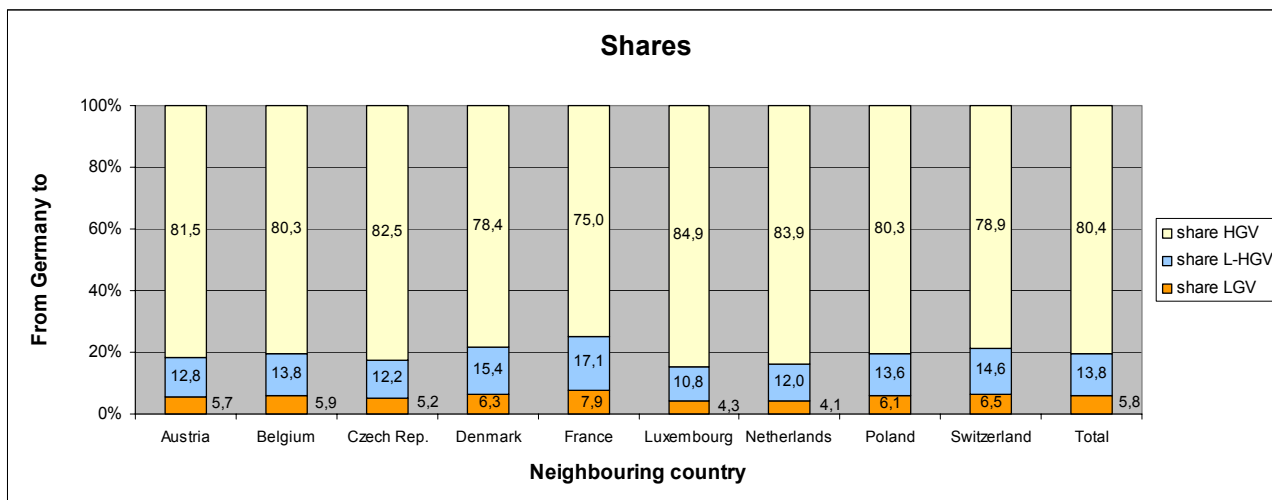
Table: road\_eqs\_lorlum

2. Share of LGVs (NSTR1 classification)

**Table 11.3 Bilateral road transport from Germany to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

<b>NSTR</b>	<b>Austria</b>	<b>Belgium</b>	<b>Czech Rep.</b>	<b>Denmark</b>	<b>France</b>	<b>Luxembourg</b>	<b>Netherlands</b>	<b>Poland</b>	<b>Switzerland</b>	<b>Total</b>
0: Agricultural products	2.797.051	628.782	549.562	119.111	488.127	190.505	723.640	820.581	198.120	6.515.479
1: Foodstuffs	1.689.574	2.107.311	1.133.894	2.016.497	3.364.260	101.875	10.345.910	996.056	691.491	22.446.868
2: Solid mineral fuels	-	-	-	-	-	-	3.921	-	-	3.921
3: Crude oil+ Petroleum products	-	1.446	45.194	-	10.110	-	20.970	39.075	-	116.795
4: Ores, metal waste	-	-	-	-	-	-	2.021	-	-	2.021
5: Metal products	41.017	12.281	1.267.539	227	10.403	437	9.223	1.214.794	8.920	2.564.841
6: Building minerals & material	1.018.338	805.874	1.060.226	-	417.338	784.052	737.592	1.044.232	964.157	6.831.809
7: Fertilizers	-	33	1.388	-	17	-	1.296	2.419	-	5.153
8: Chemicals	3.130.457	2.810.091	1.420.012	479.884	3.049.395	321.907	3.307.883	2.404.139	1.827.240	18.751.008
9: Machinery & other manufacturing	6.099.599	4.677.155	3.297.875	2.228.359	10.276.550	605.683	5.953.156	5.259.044	3.287.065	41.684.486
Total	14.776.036	11.042.973	8.775.690	4.844.078	17.616.200	2.004.459	21.105.612	11.780.340	6.976.993	98.922.381

**Figure 11.1 Maximum level of LGVs in the Road Transport market of Germany**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 11.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
Bundesverband Güterkraftverkehr Logistik und Entsorgung (BGL)	No, with the exception of driving times and rest period
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Güterkraftverkehrsgesetz, Berufszugangsverordnung
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Vehicles with 3.5 t weight and above No
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Autobahnmautgesetz
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Vehicles with 12 t weight and above No
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>

	Fahrpersonalgesetz Fahrpersonalverordnung
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Yes, driving and rest periods rules also apply on vehicles between 2.8 and 3.5 tonnes.  Lenk- und Ruhezeiten gemäß Verordnung 561/2006 gelten auch für Fahrzeuge zwischen 2,8 t und 3,5 t zulässiges Gesamtgewicht....Der Fahrer hat die Nachweise über seine Aktivitäten während der zurückliegenden 28 Tage nachzuweisen, entweder durch den EG-Tachograph oder durch handschriftliche Eintragungen in ein Fahrtenbuch. Diese Regelung gilt auf dem Territorium der Bundesrepublik Deutschland unabhängig von der Nationalität des Fahrers/des Fahrzeugs. Gründe: Verkehrssicherheit
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	No. The effects on road transport of goods are only marginal
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	No

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
BUNDESVERBAND GÜTERKRAFTVERKEHR LOGISTIK UND ENTSORGUNG (BGL) e.V. Breitenbachstraße 1, 60487 Frankfurt	Dr. Alex Schindler, Leiter der Rechtsabteilung im BGL		Telefon: ++49(0)69 7919-287 E-Mail: mailto:schindler@bgl- ev.de



## GR: Greece

### 1. Some general (road transport related) figures.

**Table 12.1 General data**

	Quantity
Area	132,0 thousand km <sup>2</sup>
Population	11,3 million (2009)
GDP	€ 239,1 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 12.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	280	1998
"Production" (mln tonkms)	4.458	2005
Goods vehicles (active fleet )	906.455	2002
< 3 tonne MLC	815.235	2002
3-7 tonne MLC	43.135	2002
> 7 tonne MLC	48.085	2002

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

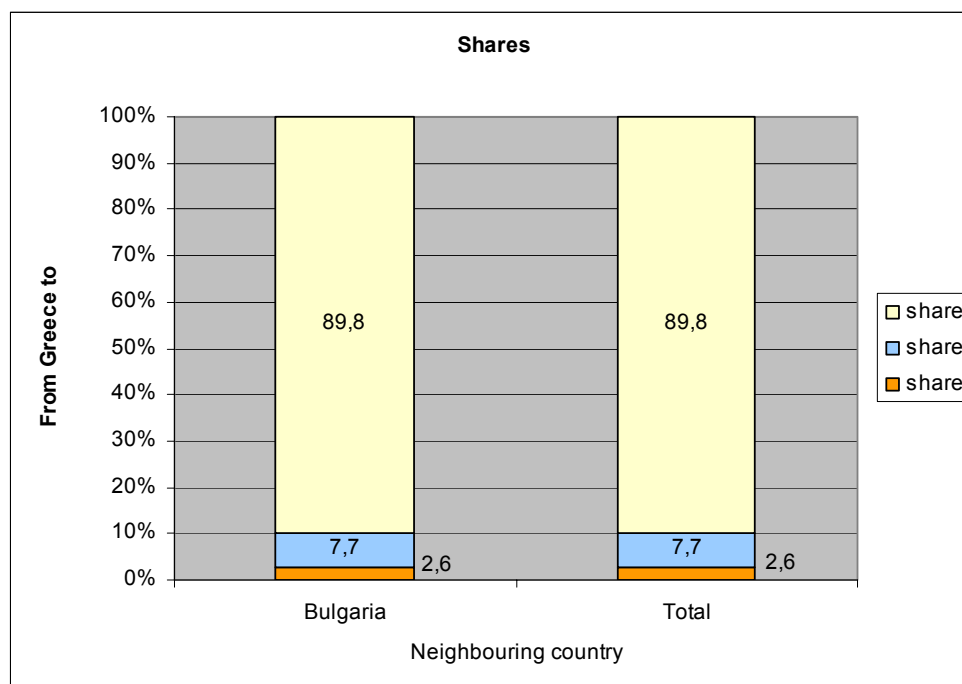
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 12.3 Bilateral road transport from Greece to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Bulgaria	Total
0: Agricultural products	72.997	72.997
1: Foodstuffs	110.498	110.498
2: Solid mineral fuels	31	31
3: Crude oil+ Petroleum products	158.551	158.551
4: Ores, metal waste	8.524	8.524
5: Metal products	190.302	190.302
6: Building minerals & material	111.347	111.347
7: Fertilizers	377	377
8: Chemicals	69.334	69.334
9: Machinery & other manufacturing	143.754	143.754
Total	865.715	865.715

**Figure 12.1 Maximum level of LGVs in the Road Transport market of Greece**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



### 3. Results of the questionnaire on legislation.

#### Remarks:

In Greece, trucks obtain a license to undertake either international road transport or national road transport (they may not do both).

Only those vehicles that are over 3.5 tonnes have the right to carry out international road transport. Therefore, the light vehicles are out of the game so to speak, when referring to international transportation of goods.

The questionnaire is therefore not applicable in this case (for Greece).

Contact information:

Organisation	Contactperson	Adress	Telno.
OFAE	Helen Tsivranidis		ofae-ath@ath.forthnet.gr

## HU: Hungary

### 1. Some general (road transport related) figures.

**Table 13.1 General data**

	Quantity
Area	93,0 thousand km <sup>2</sup>
Population	10,0 million (2009)
GDP	€ 105,7 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 13.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	785	2004
"Production" (mln tonkms)	15.407	2007
Goods vehicles (active fleet )	418.360	2005
< 3 tonne MLC	352.198	2005
3-7 tonne MLC	42.932	2005
> 7 tonne MLC	14.851	2005

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

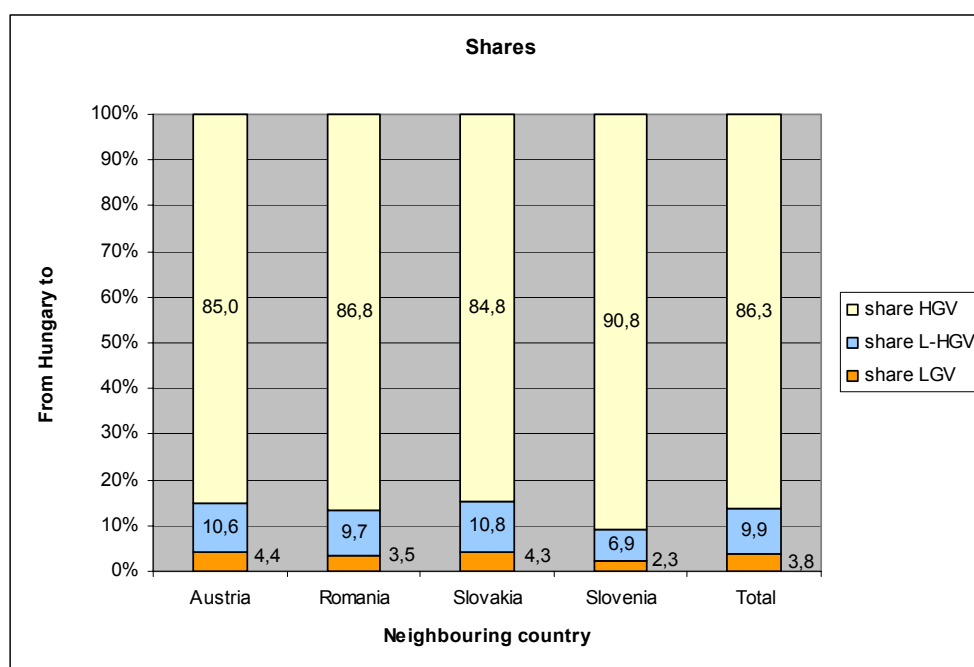
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 13.3 Bilateral road transport from Hungary to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Austria	Romania	Slovakia	Slovenia	Total
0: Agricultural products	580.050	348.050	71.585	282.071	1.281.756
1: Foodstuffs	248.546	387.527	104.655	83.555	824.283
2: Solid mineral fuels	-	7.258	-	-	7.258
3: Crude oil+ Petroleum products	57.697	190.097	166.026	181.195	595.015
4: Ores, metal waste	-	145	13.258	3.289	16.692
5: Metal products	65.494	67.613	77.298	24.692	235.097
6: Building minerals & material	750.964	486.704	551.825	123.414	1.912.907
7: Fertilizers	6.229	-	36.126	25.659	68.014
8: Chemicals	163.373	264.285	187.225	157.891	772.774
9: Machinery & other manufacturing	861.576	565.706	528.578	153.066	2.108.926
Total	2.733.929	2.317.385	1.736.576	1.034.832	7.822.722

**Figure 13.1 Maximum level of LGVs in the Road Transport market of Hungary**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 13.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	<i>No, but we deem it necessary, due to the fact that the infringements (speeding, exceeding daily driving times) committed by drivers/hauliers of LGVs is representing increasingly high percentage.</i>
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	<i>Ministerial decree no. 14/2001 about professional conditions and licensing procedure of domestic and international road transport</i>  <i>Ministerial decree no. 49/2001 about professional conditions and authorisation of domestic and international passenger transport by coach</i>
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<i>49/2001 -&gt; undertakings with premises in Hungary performing passenger transport and as regards carriage on own account for one man companies, legal entities/persons and undertakings without legal personality operating buses in Hungary</i>  <i>14/2001 -&gt; undertakings with premises in Hungary carrying out hauling goods</i>

<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	<p><i>Ministerial decree no. 36/2007 about fees to paid for the use of freeways, highways and major roads</i></p> <p><i>Ministerial decree no. 37/2007 about freeways, highways and major roads to be used for a fee</i></p>
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p><i>Yes, see category D1.</i></p> <p><i>36/2007 -&gt; Vehicle categories submitted to road toll are as follows:</i></p> <p><i>D1 – motorcycles, road vehicles up to 3.5t including trailers</i></p> <p><i>D2 – road vehicles from 3.5-7.5t in combination with trailers too (trains)</i></p> <p><i>D3 – 7.5-12t in combination with trailers too</i></p> <p><i>D4 – vehicles not falling under the above mentioned categories</i></p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	<p><i>Law no. 1/1988 about road transport</i></p> <p><i>Governmental decree no. 66/2007. about the control of driving and resting time of vehicles' crew performing road haulage</i></p> <p><i>Governmental decree no. 156/2009 on the amount of the penalties that may be levied in case of infringement of certain rules related to the road goods transport, passenger transport and road traffic, as well as on the tasks of the authorities concerning the application of such penalties</i></p> <p><i>Ministerial decree no. 43/2007 about detailed rules of checks performed by the transport authority based on the certain social rules concerning road transport</i></p> <p><i>Ministerial decree no. 124/2005 about implementation of regulation 3821/85/EEC</i></p> <p><i>Ministerial decree no. 6/1990 about the conditions of putting and keeping in service of road vehicles</i></p>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p><i>1/1998 -&gt; to all participating in road transport in Hungary, to vehicles, roads, vicinity of roads and facilities serving/supporting road transport</i></p> <p><i>Provision of the law should only be applied abroad to Hungarian registered vehicles and operators, drivers thereof if foreign legislation, international treaty, agreement, convention doesn't dispose distinctly</i></p> <p><i>Provision of the law should only apply to foreign registered vehicles, and operators, drivers thereof if legislation, international treaty, agreement, convention doesn't dispose distinctly</i></p>

	<p>66/2007 -&gt; crew (driver), vehicle, undertaking performing activities in scope of AETR or 561/2006/EC, moreover to inspecting authorities and their inspectors (at roadside or premises)</p> <p>156/2009 -&gt; all persons committing infringements against provisions listed in §20 (1) of law no 1/1988. This includes the following:</p> <p>a) road transport services (goods or passengers) subject to authorisation/licensing,  b) carriage on own account both goods and passengers subject to possession of defined document,  c) social requirements of road transport, driving time, breaks and rest time,  d) use of tachographs, sheets, cards,  e) transport of dangerous goods, carrier, road vehicle and its crew, sender of goods, person temporarily storing it, packager, loader, filler, consignee and the designation, training of the ADR security advisor,  f) transports of quickly perishable food products and livestock,  g) road transport performed with hired vehicles,  h) technical and environmental conditions of vehicles performing road transport services or own account carriage, circulation of vehicles exceeding max. permissible weight, axle load and dimensions and transport of bulk goods  i) promotions facilitating international combined (multi-modal) goods transport,  j) restrictions on circulation of HGVs,</p> <p>k) use of safety belts, child restrain systems, motorcycle helmets and mobile phones</p> <p>43/2007 -&gt; crew (driver), vehicle, undertaking performing activities in scope of AETR or 561/2006/EC, moreover to transport authority's regional directorates and their roadside inspectors</p> <p>124/2005 -&gt; natural and legal persons, undertakings without legal personality and one man companies falling under scope of 3821</p> <p>The application scope of the decree covers:</p> <p>a) approval of tachographs, sheets and cards  b) installation, putting into service, activation, calibration and repair of tachographs  c) use of tachographs, cards, sheets, attestation form  d) procedure of tachograph card issuing, exchange and replacement including registration of tachograph cards and corresponding data handling as well as international data exchange</p> <p>6/1990 -&gt; vehicles circulating in Hungary on public roads (including private roads open for public use). For foreign vehicles technical conditions as laid down in Vienna Convention (1968) on road transport apply.</p>
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	Yes
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	Yes

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
National Transport Authority Hungary	<i>Mr. Árpád Gordos, coordinator for international affairs</i>		gordos.arpad@nkh.gov.hu





## IE: Ireland

### 1. Some general (road transport related) figures.

**Table 14.1 General data**

	Quantity
Area	70,3 thousand km <sup>2</sup>
Population	4,5 million (2009)
GDP	€ 181,9 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 14.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	247	2004
"Production" (mln tonkms)	3.187	2007
Goods vehicles (active fleet )	268.082	2003
< 3 tonne MLC	missing	
3-7 tonne MLC	missing	
> 7 tonne MLC	missing	

MLC= Maximum Loading Capacity

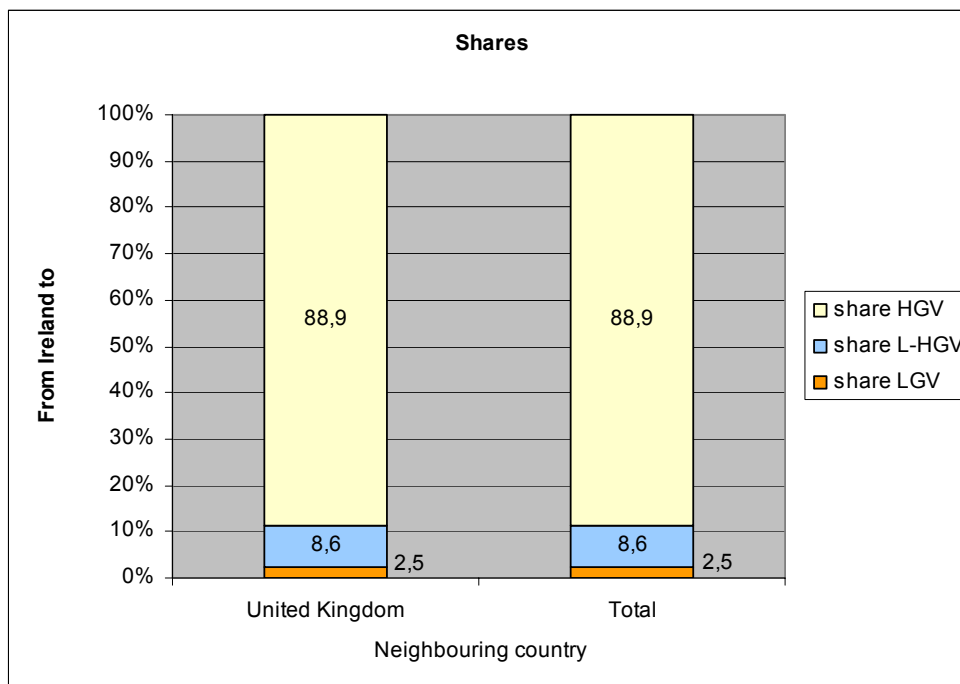
Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt; Table: road\_eqs\_lorum

### 2. Share of LGVs (NSTR1 classification)

**Table 14.3 Bilateral road transport from Ireland to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	United Kingdom	Total
0: Agricultural products	25.846	25.846
1: Foodstuffs	78.013	78.013
2: Solid mineral fuels	2.604	2.604
3: Crude oil+ Petroleum products	10.730	10.730
4: Ores, metal waste	343	343
5: Metal products	5.605	5.605
6: Building minerals & material	29.490	29.490
7: Fertilizers	1.255	1.255
8: Chemicals	24.723	24.723
9: Machinery & other manufacturing	34.130	34.130
Total	212.739	212.739

**Figure 14.1 Maximum level of LGVs in the Road Transport market of Ireland**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



3. Results of the questionnaire on legislation.

**Table 14.4 Results of the questionnaire**

**No Response**

**Remarks:**

## IT: Italy

### 1. Some general (road transport related) figures.

**Table 15.1 General data**

	Quantity
Area	301,3 thousand km <sup>2</sup>
Population	60,1 million (2009)
GDP	€ 1.572,1 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 15.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	6.478	1998
"Production" (mln tonkms)	24.950	2005
Goods vehicles (active fleet )	4.069.035	2001
< 3 tonne MLC	1.958.812	2001
3-7 tonne MLC	246.357	2001
> 7 tonne MLC	1.863.866	2001

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

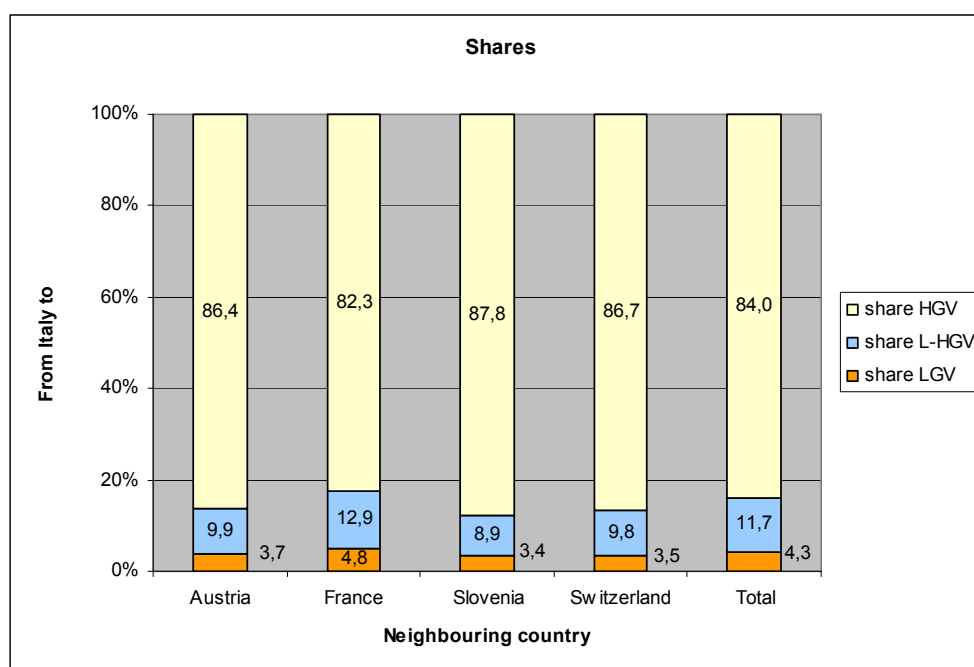
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 15.3 Bilateral road transport from Italy to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Austria	France	Slovenia	Switzerland	Total
0: Agricultural products	228.762	415.429	98.917	187.444	930.552
1: Foodstuffs	586.983	5.259.143	123.647	478.772	6.448.545
2: Solid mineral fuels	-	-	-	-	-
3: Crude oil+ Petroleum products	560	6.669	43.593	45.456	96.278
4: Ores, metal waste	-	-	-	-	-
5: Metal products	449.763	388.765	298.814	81.884	1.219.226
6: Building minerals & material	325.224	763.136	255.226	1.095.214	2.438.800
7: Fertilizers	-	-	399	-	399
8: Chemicals	582.560	1.578.825	479.332	480.834	3.121.551
9: Machinery & other manufacturing	729.178	4.384.088	368.111	727.402	6.208.779
Total	2.903.030	12.796.055	1.668.039	3.097.006	20.464.130

**Figure 15.1 Maximum level of LGVs in the Road Transport market of Italy**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 15.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
	Oui, on applique les memes dispositions relatives au transport de marchandises au moyen de véhicules de poids lourds.
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Le décret législatif n. 395 du 22/12/2000 a transposé la Directive n. 98/76/CE (qui a modifié la Directive n. 96/26/CE) sur l'accès à la profession.  Le décret ministériel n. 161 du 18/4/2005 a rendu applicable les dispositions ci-dessus.
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	La disposition s'applique au transport au moyen de véhicules d'un poids supérieur à 1,5 tonnes.
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	En Italie la Directive 1999/62/CE n'a pas encore été transposée. Récemment le Conseil des Ministres a approuvé un schéma de décret de transposition de la

	Directive mais il doit encore etre soumis à l'avis du Parlement.
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	--
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006 on Driving Times and Rest Period</u>, and <u>Regulation (EEC) 3821/85 on the Tachograph</u>, introduced in your country?</b>
	Les Règlements communautaires sont directement applicables et donc ils n'ont pas besoin de transposition nationale. En Italie, les Règlements sont appliqués par le Code de la Route et par les accords collectifs nationaux de travail.
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	On doit respecter ce que les Règlements ont disposé.
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	En Italie on est pénalisé parce que dans tous les pays limitrophes le transport au moyen de véhicules jusqu'à 3,5 tonnes est libéralisé tandis que chez nous ce n'est pas comme ça. C'est pour cela qu'on voudrait que le Règlement en cours de promulgation ne laisse pas la possibilité aux Etats de baisser le niveau du poids au-dessous de 3,5 tonnes, comme a fait l'Italie. Le transport au moyen d'utilitaires légers doit etre libre puisqu'il n'a pas un grand impact sur le transport international.
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>

**Remarks:**

Contact information:

<b>Organisation</b>	<b>Contactperson</b>	<b>Adress</b>	<b>Telno.</b>
CONFETRA Confederazione Generale Italiana dei Trasporti e della Logistica			confetra@confetra.com



## LV: Latvia

### 1. Some general (road transport related) figures.

**Table 16.1 General data**

	Quantity
Area	64,6 thousand km <sup>2</sup>
Population	2,3 million (2009)
GDP	€ 23,2 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 16.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	0	2007
"Production" (mln tonkms)	5.812	2007
Goods vehicles (active fleet )	113.228	2007
< 3 tonne MLC	68.427	2007
3-7 tonne MLC	28.289	2007
> 7 tonne MLC	16.512	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

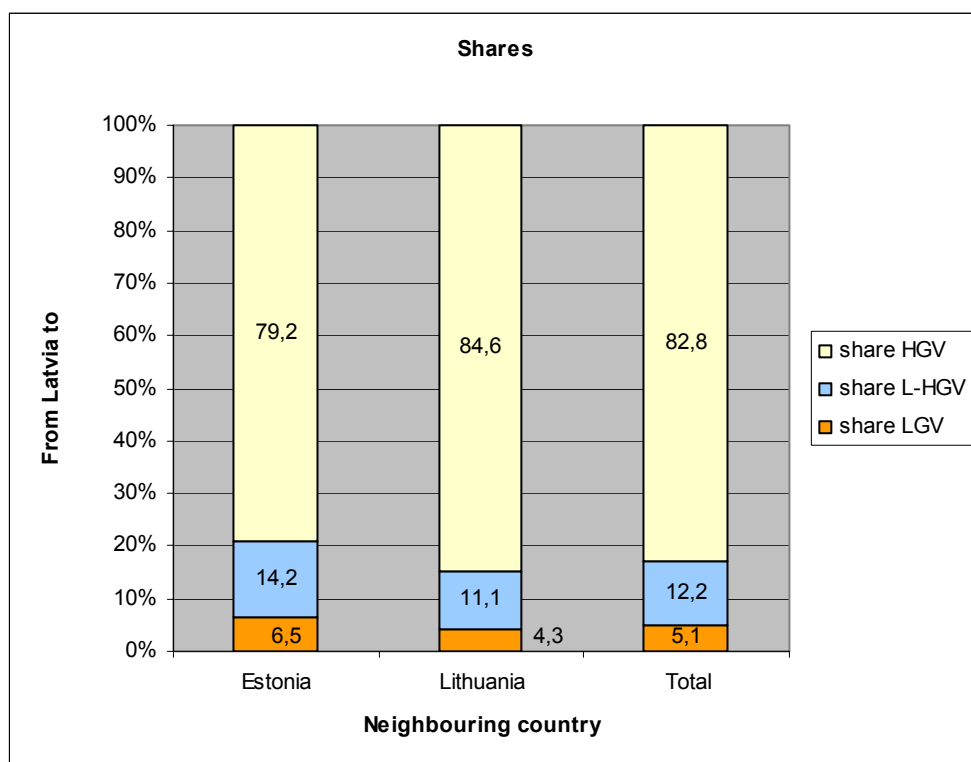
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 16.3 Bilateral road transport from Latvia to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Estonia	Lithuania	Total
0: Agricultural products	142.166	94.747	236.913
1: Foodstuffs	88.466	247.415	335.881
2: Solid mineral fuels	-	59	59
3: Crude oil+ Petroleum products	4.501	19.320	23.821
4: Ores, metal waste	125	1.084	1.209
5: Metal products	7.722	136.999	144.721
6: Building minerals & material	12.286	121.764	134.050
7: Fertilizers	-	1.551	1.551
8: Chemicals	14.485	77.444	91.929
9: Machinery & other manufacturing	261.352	309.891	571.243
Total	531.103	1.010.274	1.541.377

**Figure 16.1 Maximum level of LGVs in the Road Transport market of Latvia**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 16.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
	No
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	<p>Regulation of Cabinet of Ministers Nr. 120 Procedures for issuing, withdraw or suspend the special permits (licenses) and the license cards for hire and reward carriage by road Riga, 2005 February 8, Issued in accordance with the Road Transport Act of Article 6 of the fourth and fifth paragraph of Section 30  <a href="http://www.atd.lv/lat/normativieakti/ministrukabinetanoteikumi/?doc=643">http://www.atd.lv/lat/normativieakti/ministrukabinetanoteikumi/?doc=643</a></p> <p>Regulation of the Cabinet of Ministers Nr. 250 Procedures for issuing passenger and freight transport certificates of professional competence Riga, 2006, April 4 Issued in accordance with the Road Transport Act of Article 6 of the fourth and fifth paragraph of Section 30 and the Law "On Regulated Professions and Recognition of Professional Qualifications Section 18 eighth paragraph  <a href="http://www.atd.lv/lat/normativieakti/ministrukabinetanoteikumi/?doc=653">http://www.atd.lv/lat/normativieakti/ministrukabinetanoteikumi/?doc=653</a></p>
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>



	For N1 category vehicles.
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	The Law of on Annual Vehicle Tax (01.01.2002) with amendments. <a href="http://www.likumi.lv/doc.php?id=56246">http://www.likumi.lv/doc.php?id=56246</a>
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	The annual vehicle tax rate for LGVs is set and levying mechanism described.
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	In the Republic of Latvia there is no special legislation which regulates Driving Times and Rest Period accounting rules for the drivers which driving transport vehicles with a total mass lower than 3.5 tonnes. The Driving Times and Rest Period is accounted in accordance with the general labour law. <a href="http://www.likumi.lv/doc.php?id=26019">http://www.likumi.lv/doc.php?id=26019</a>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	The Driving Times and Rest Period is accounted in accordance with the general labour law and is valid for drivers driving transport vehicles with a total mass higher than 3.5 tonnes. It does not apply for to vehicles with a total mass lower than 3.5 tonnes.
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	No.
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	No.

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
Road Transport Administration of Latvia;	Maris Vaics- Head of Licensing Division, Indra Gromule – Head of International Road Carriage Co-ordination Division,		Indra.gromule@atd.lv



## LT: Lithuania

### 1. Some general (road transport related) figures.

**Table 17.1 General data**

	Quantity
Area	65,2 thousand km <sup>2</sup>
Population	3,4 million (2009)
GDP	€ 32,2 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 17.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	309	2007
"Production" (mln tonkms)	9.375	2007
Goods vehicles (active fleet )	126.507	2007
< 3 tonne MLC	66.784	2007
3-7 tonne MLC	37.206	2007
> 7 tonne MLC	22.517	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

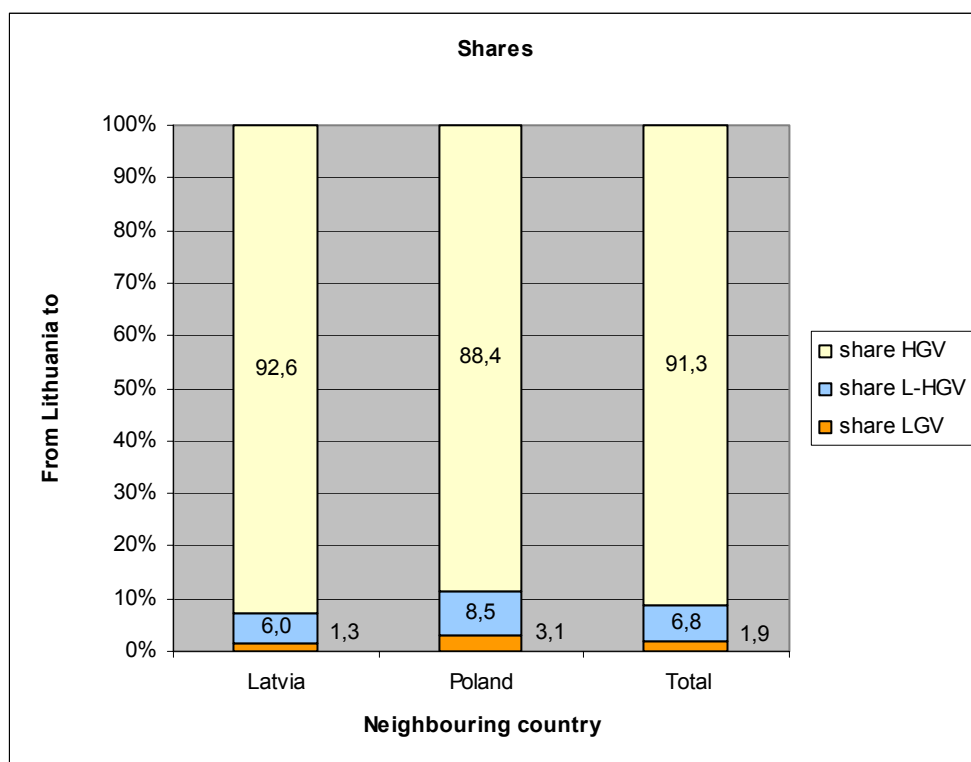
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 17.3 Bilateral road transport from Lithuania to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Latvia	Poland	Total
0: Agricultural products	258.528	235.199	493.727
1: Foodstuffs	202.518	123.183	325.701
2: Solid mineral fuels	-	-	-
3: Crude oil+ Petroleum products	692.000	205.625	897.625
4: Ores, metal waste	8.498	2	8.500
5: Metal products	40.375	32.732	73.107
6: Building minerals & material	675.236	6.293	681.529
7: Fertilizers	45.572	35.594	81.166
8: Chemicals	78.779	116.667	195.446
9: Machinery & other manufacturing	152.772	209.154	361.926
Total	2.154.278	964.449	3.118.727

**Figure 17.1 Maximum level of LGVs in the Road Transport market of Lithuania**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



3. Results of the questionnaire on legislation.

**No Response**

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
<Name>	0		

## LU: Luxembourg

### 1. Some general (road transport related) figures.

**Table 18.1 General data**

	Quantity
Area	2,6 thousand km <sup>2</sup>
Population	0,5 million (2009)
GDP	€ 39,3 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 18.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	137	2003
"Production" (mln tonkms)	2.728	2007
Goods vehicles (active fleet )	21.730	2000
< 3 tonne MLC	16.499	2000
3-7 tonne MLC	1.640	2000
> 7 tonne MLC	3.591	2000

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

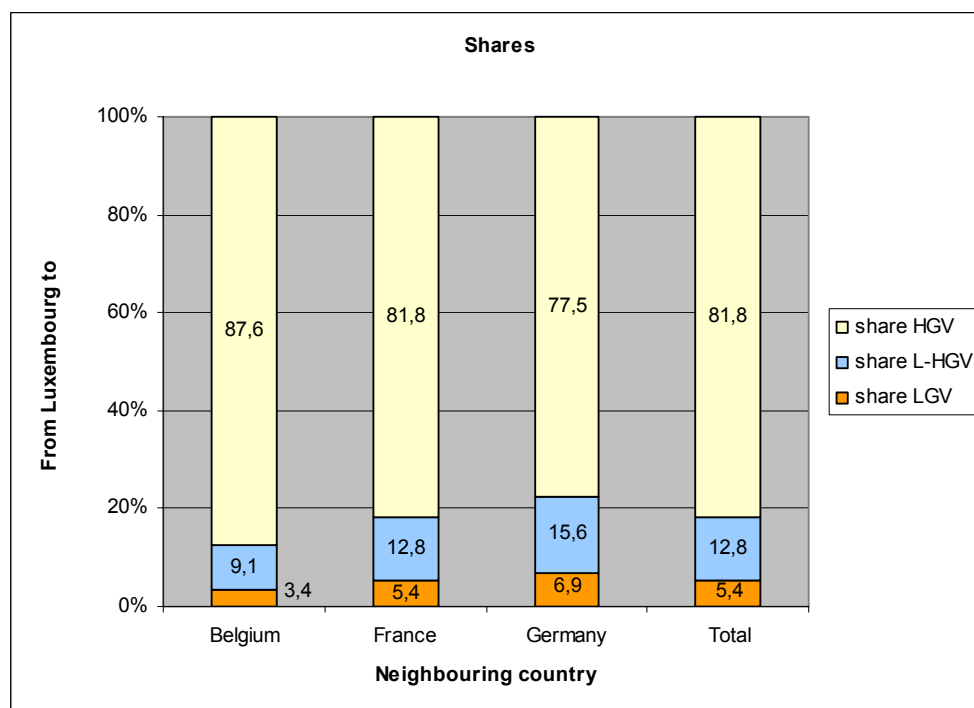
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 18.3 Bilateral road transport from Luxembourg to the neighbouring countries (Number of tonnes x1000; year= 2007)**

NSTR	Belgium	France	Germany	Total
0: Agricultural products	259.000	94.116	107.846	460.962
1: Foodstuffs	143.584	157.252	301.684	602.520
2: Solid mineral fuels	-	-	-	-
3: Crude oil+ Petroleum products	-	-	-	-
4: Ores, metal waste	-	-	-	-
5: Metal products	3.590	26.901	1.477	31.968
6: Building minerals & material	198.964	223.005	90.666	512.635
7: Fertilizers	-	-	-	-
8: Chemicals	131.177	128.947	111.360	371.484
9: Machinery & other manufacturing	226.110	402.133	642.715	1.270.958
Total	962.425	1.032.354	1.255.748	3.250.527

**Figure 18.1 Maximum level of LGVs in the Road Transport market of Luxembourg**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 18.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	Non. Cela relève de la politique des transports générale.
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Loi du 30 juillet 2002 concernant l'établissement de transporteur de voyageurs et de transporteur de marchandises par route et portent transposition de la directive 98/76/CE du Conseil du 1 <sup>er</sup> octobre 1998
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Cette loi s'applique aux personnes physiques ou morales exerçant la profession de transporteur de marchandises par route au moyen de camions, de véhicules automoteurs ou d'ensembles de véhicules dont la masse maximale autorisée est supérieure à 3,5 tonnes. Elle ne vise donc pas utilitaires légers.
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Loi du 24 février 1995 (modifiée) portant approbation et application de l'Accord relatif à la perception d'un droit d'usage pour l'utilisation de certaines routes par des

	véhicules utilitaires lourds, fait à Bruxelles, le 9 février 1994
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>L'objet principal de cette loi est d'approuver l'Accord entre les Gouvernements du Grand-Duché de Luxembourg, du Royaume de Belgique, du Royaume du Danemark, de la République fédérale d'Allemagne et du Royaume des Pays-Bas relatif à la perception d'un droit d'usage pour l'utilisation de certaines routes par des véhicules utilitaires lourds, fait à Bruxelles le 9 février 1994.</p> <p>Par cet accord LU, BE, NL, DK, SE et DE ont introduit un droit d'usage commun dans la forme d'une vignette appelée « Eurovignette ». Depuis, l'Allemagne a quitté ce système, de sorte qu'il ne reste plus que cinq membres.</p> <p>Ce droit d'usage s'applique à des véhicules ou ensembles de véhicules qui sont exclusivement destinés au transport de marchandises et qui ont une masse maximale autorisée supérieure à 12 tonnes.</p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006 on Driving Times and Rest Period</u>, and <u>Regulation (EEC) 3821/85 on the Tachograph</u>, introduced in your country?</b>
	<p>Règlement grand-ducal du 13 octobre 2006 concernant les modalités relatives à l'appareil de contrôle dans le domaine des transports par route et fixant les sanctions des infractions aux dispositions du règlement (CE) n° 561/2006 du Parlement et du Conseil du 15 mars 2006 relatif à l'harmonisation de certaines dispositions de la législation sociale dans le domaine des transports par route, modifiant les règlements (CEE) n° 3821/85 et (CE) n° 2135/98 du Conseil et abrogeant le règlement (CEE) n° 3820/85 du Conseil et du règlement (CEE) n° 3821/85 modifié du Conseil des Communautés Européennes concernant l'appareil de contrôle dans le domaine des transports par route</p>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>Ce règlement grand-ducal règle la matière des tachygraphes et cartes tachygraphiques et prévoit les sanctions tant pour cette matière que pour les temps de conduite et périodes de repos.</p> <p>Il s'applique aux véhicules visés par le règlement (CE) n° 561/2006, ce qui n'inclut donc pas les utilitaires légers.</p>
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	Tel ne semble pas être le cas actuellement au Luxembourg.
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	Pour répondre à cette question, il serait nécessaire de faire d'abord une étude à ce sujet.

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
Ministère du Développement durable et des Infrastructures Département des Transports 19-21, boulevard Royal L-2449 Luxembourg	M. Guy STAUS Conseiller de direction 1 <sup>e</sup> classe		Tél. (+352) 247-84437 Fax. (+352) 228201 e-mail: <a href="mailto:guy.staus@tr.etat.lu">guy.staus@tr.etat.lu</a>



## MT: Malta

1. Some general (road transport related) figures.

**Table 19.1 General data**

	Quantity
Area	0,3 thousand km <sup>2</sup>
Population	0,4 million (2009)
GDP	€ 5,7 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 19.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	missing	
"Production" (mln tonkms)	missing	
Goods vehicles (active fleet )	42.615	2001
< 3 tonne MLC	10.192	2001
3-7 tonne MLC	25.685	2001
> 7 tonne MLC	6.738	2001

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

Table: road\_eqs\_lorlum

2. Share of LGVs (NSTR1 classification)

As Malta is an island state, and, although it can be reached by freight vehicles using ferries, thus it has been excluded from this study.

3. Results of the questionnaire on legislation.

**Table 19.4 Results of the questionnaire**

*No response*

### Remarks:

Contact information:

Organisation	Contactperson	Adress	Telno.
<Name>	0		



## NL: The Netherlands

### 1. Some general (road transport related) figures.

**Table 20.1 General data**

	Quantity
Area	37,4 thousand km <sup>2</sup>
Population	16,5 million (2009)
GDP	€ 595,9 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 20.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	2.342	2003
"Production" (mln tonkms)	36.195	2007
Goods vehicles (active fleet )	970.583	2003
< 3 tonne MLC	906.582	2003
3-7 tonne MLC	17.696	2003
> 7 tonne MLC	46.305	2003

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

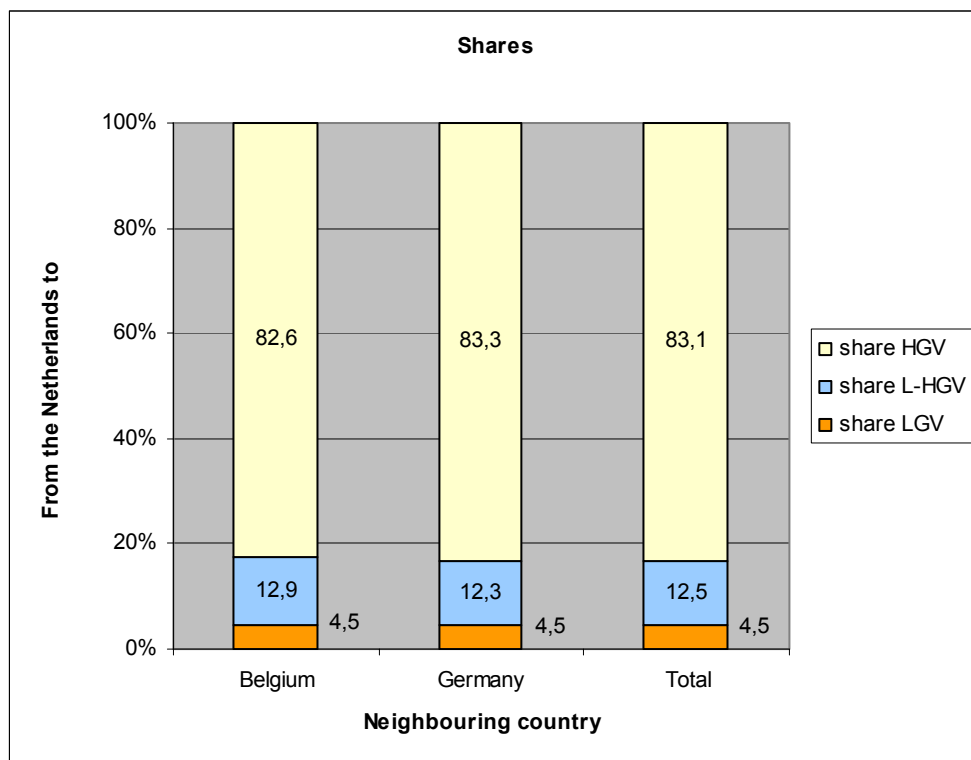
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 20.3 Bilateral road transport from the Netherlands to the neighbouring countries(Number of tonnes x1000; year= 2007)**

NSTR	Belgium	Germany	Total
0: Agricultural products	231.335	652.942	884.277
1: Foodstuffs	4.540.759	8.230.823	12.771.582
2: Solid mineral fuels	-	13.378	13.378
3: Crude oil+ Petroleum products	-	75.580	75.580
4: Ores, metal waste	-	1.067	1.067
5: Metal products	-	16.589	16.589
6: Building minerals & material	27.225	136.853	164.078
7: Fertilizers	-	1.212	1.212
8: Chemicals	578.691	4.625.130	5.203.821
9: Machinery & other manufacturing	2.479.267	6.127.489	8.606.756
Total	7.857.277	19.881.063	27.738.340

**Figure 20.1 Maximum level of LGVs in the Road Transport market of the Netherlands**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 20.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
TLN	Yes, according to the Wet Wegvervoer Goederen (WVG) professional road transport is meant as road transport for hire and reward, not being for own account. <a href="#">WVG.pdf (op 1 mei 2009 in werking getreden)</a> .
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Yes, according to the Wet Wegvervoer Goederen (WVG) professional road transport is meant as road transport for hire and reward, not being for own account. <a href="#">WVG.pdf (op 1 mei 2009 in werking getreden)</a> .
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Scope of WVG is given in article 1 sub 3:  This law applies on professional transport for hire and reward and for own

	<p>account that is carried out a) by an operator established in The Netherlands; b; in The Netherlands by an operator located outside The Netherlands.</p> <p>The WVG for international transport only requires a license for vehicles above 3.5 tonnes</p>
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Wet op de motorrijtuigenbelasting 1994
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	All vehicles, including LGVs
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	Arbeidstijden vervoer
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Art 2.3.1 A lorry with a loading capacity of min. 500 tonnes
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	<p>No,</p> <p>It is not an alternative. They complement each other. It is certainly not fake competition. Each entrepreneur can use light vehicles to carry out professional road haulage.</p>
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	No, perhaps only a requirement for a license for international transport below 3.5 t

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
Ministry of Transport	Bob Oudshoorn		Bob.Oudshoorn@minvenw.nl
TLN	Henk Kramer		HKramer@tln.nl



## NO: Norway

### 1. Some general (road transport related) figures.

**Table 21.1 General data**

	Quantity
Area	323,8 km <sup>2</sup>
Population	4,8 million (2009)
GDP	€ 309,7 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 21.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	239	2007
"Production" (mln tonkms)	3.876	2007
Goods vehicles (active fleet )	505.659	2007
< 3 tonne MLC	462.371	2007
3-7 tonne MLC	10.408	2007
> 7 tonne MLC	32.880	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

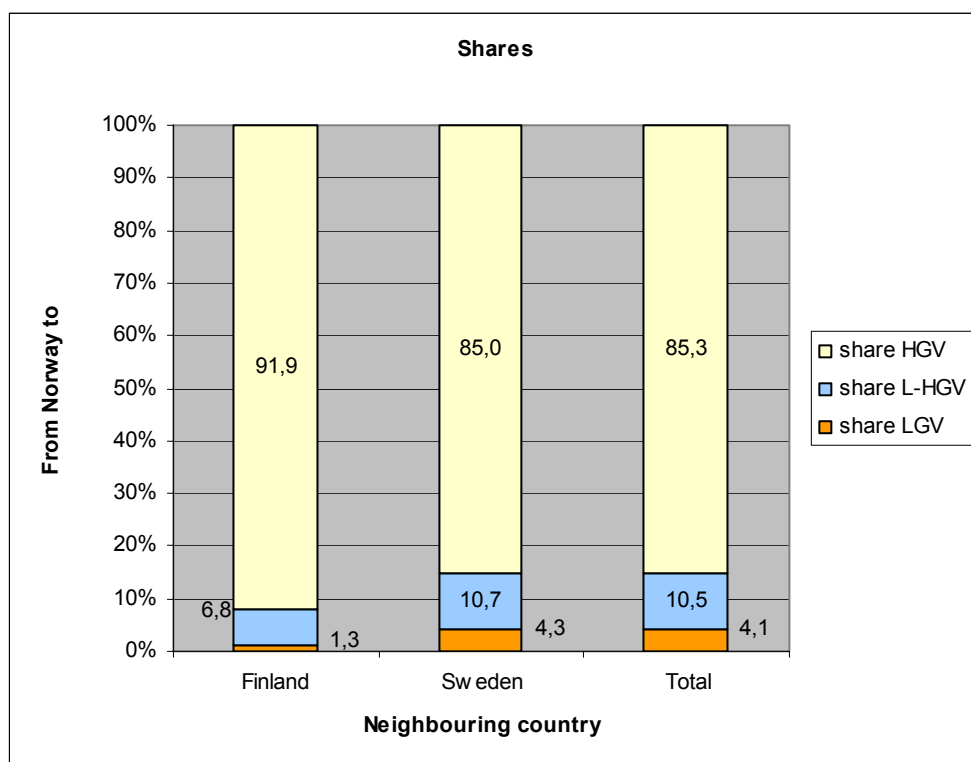
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 21.3 Bilateral road transport from Norway to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Finland	Sweden	Total
0: Agricultural products	-	416.563	416.563
1: Foodstuffs	20.972	362.785	383.757
2: Solid mineral fuels	-	826	826
3: Crude oil+ Petroleum products	90.945	295.712	386.657
4: Ores, metal waste	-	6.652	6.652
5: Metal products	-	80.822	80.822
6: Building minerals & material	5.519	279.853	285.372
7: Fertilizers	-	6.107	6.107
8: Chemicals	-	479.721	479.721
9: Machinery & other manufacturing	7.920	830.726	838.646
Total	125.356	2.759.767	2.885.123

**Figure 21.1 Maximum level of LGVs in the Road Transport market of Norway**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 21.4 Results of the questionnaire**

#### Remarks:

Contact information:

Organisation	Contactperson	Adress	Telno.
<Name>	0		



## PL: Poland

### 1. Some general (road transport related) figures.

**Table 22.1 General data**

	Quantity
Area	312,7 thousand km <sup>2</sup>
Population	38,1 million (2009)
GDP	€ 363, billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 22.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	663	2007
"Production" (mln tonkms)	67.492	2007
Goods vehicles (active fleet )	2.345.068	2007
< 3 tonne MLC	1.979.255	2007
3-7 tonne MLC	214.049	2007
> 7 tonne MLC	151.764	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

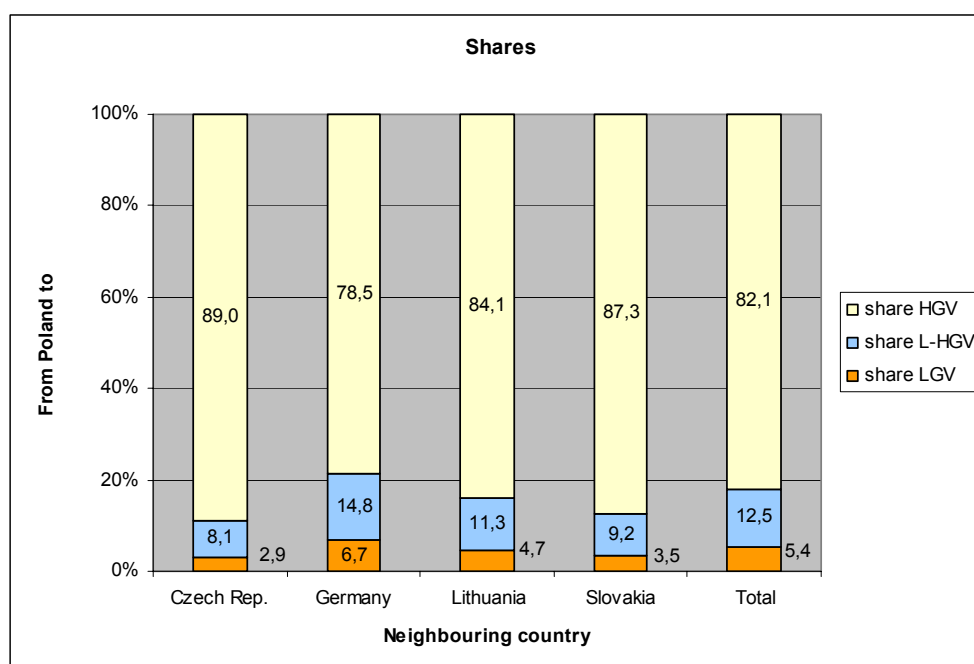
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 22.3 Bilateral road transport from Poland to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Czech Rep.	Germany	Lithuania	Slovakia	Total
0: Agricultural products	188.009	731.023	219.988	77.502	1.216.522
1: Foodstuffs	428.155	1.644.209	217.388	203.154	2.492.906
2: Solid mineral fuels	-	-	-	-	-
3: Crude oil+ Petroleum products	254.151	5.409	7.906	188.138	455.604
4: Ores, metal waste	30.829	330	-	33.300	64.459
5: Metal products	699.959	978.588	104.940	279.903	2.063.390
6: Building minerals & material	739.590	703.391	124.941	140.237	1.708.159
7: Fertilizers	118.837	3.744	3.131	43.590	169.302
8: Chemicals	948.487	1.481.524	160.450	206.880	2.797.341
9: Machinery & other manufacturing	769.198	5.419.419	423.309	371.596	6.983.522
Total	4.177.215	10.967.637	1.262.053	1.544.300	17.951.205

**Figure 22.1 Maximum level of LGVs in the Road Transport market of Poland**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 22.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
	No
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	<ul style="list-style-type: none"> <li>- Road Transport Act (Dz.U. 2001 nr 125, poz. 1371);</li> <li>- Act on amendment and derogation of acts due to the accession of Republic of Poland to EU (Dz.U. 2004, nr 96, poz. 959);</li> <li>- Transport Minister Act amending the Act on admission of certificate of competence in road transport. (Dz.U. 2007, nr 168, poz. 1184).</li> </ul> <p>Unfortunately mentioned acts are in polish only.</p>
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<ul style="list-style-type: none"> <li>- kinds of road transport</li> <li>- competences and responsibilities of Road Transport Inspection,</li> <li>- entities responsible for issuing documents in road transport,</li> <li>- conditions to be filled while carrying out road transport,</li> <li>- threat posed to health and environment caused by plant protection products,</li> <li>- rules on benefit from freedom of market in road transport.</li> </ul> <p>No, mentioned acts do not distinguish LGVs.</p>
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>

	<ul style="list-style-type: none"> <li>- Road Transport Act (Dz.U. 2001 nr 125, poz. 1371);</li> <li>- Act on amendments and derogations of acts due to the accession of Republic of Poland to EU (Dz.U. 2004, nr 96, poz. 959);</li> <li>- Act amending the Act on motorway fees and the National Road Fund and the Road Transport Act (Dz.U. 2004, nr 96, poz. 959);</li> <li>- Act of Minister in charge of transport on transit fee for national roads (Dz.U. 2009, nr 86, poz. 721);</li> </ul>
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<ul style="list-style-type: none"> <li>- specimens of payment confirming document;</li> <li>- kind of fees;</li> <li>- payment procedure.</li> </ul> <p>No, mentioned acts do not distinguish LGV.</p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006 on Driving Times and Rest Period</u>, and <u>Regulation (EEC) 3821/85 on the Tachograph</u>, introduced in your country?</b>
	<p>only:</p> <ul style="list-style-type: none"> <li>- Act on drivers working time (Dz.U. 2001 nr 123 poz. 1354);</li> <li>- Act on the digital tachograph system (Dz.U. 2005 nr 180 poz. 1494).</li> </ul> <p>Unfortunately mentioned acts are in polish only.</p>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<ul style="list-style-type: none"> <li>- Responsibilities put on the employers;</li> <li>- drivers work schedule;</li> <li>- rules concerning driving time, mandatory breaks, rest period;</li> <li>- taking up, carrying out, dissolving workshop dealing with fitting, servicing, checking tachographs.</li> </ul> <p>Mentioned acts do not distinguish LGV.</p>
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	<p>In our opinion, it might have significant influence on unfair competition, degradation of infrastructure etc., but we do not dispose any statistics to prove it.</p>
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	<p>It is my understanding that the issue of LVG should be addressed in a more detailed manner.</p>

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
International Affairs Unit General Inspectorate of Road Transport	Joanna Chmielewska- Chłopicka		Joanna.Chmielewsk a@gitd.gov.pl
ZMPD	Anna Ganlik		www.zmpd.pl

## PT: Portugal

### 1. Some general (road transport related) figures.

**Table 23.1 General data**

	Quantity
Area	92,1 thousand km <sup>2</sup>
Population	10,6 million (2009)
GDP	€ 166,4 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 23.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	2.613	2007
"Production" (mln tonkms)	18.056	2007
Goods vehicles (active fleet )	1.829.158	2001
< 3 tonne MLC	1.481.877	2001
3-7 tonne MLC	68.303	2001
> 7 tonne MLC	278.977	2001

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

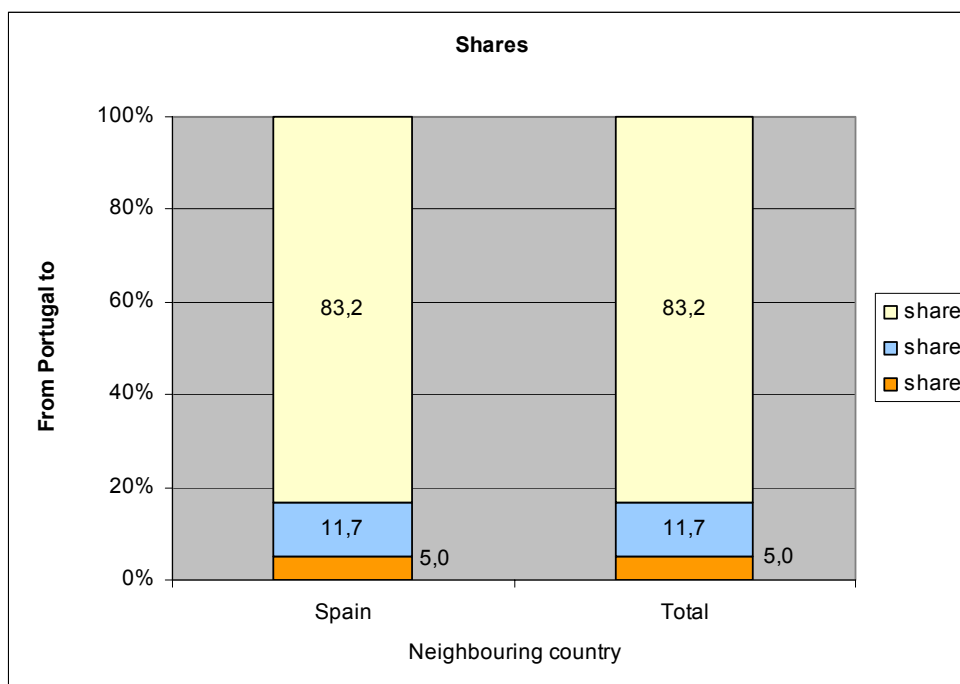
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 23.3 Bilateral road transport from Portugal to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Spain	Total
0: Agricultural products	1.267.730	1.267.730
1: Foodstuffs	957.713	957.713
2: Solid mineral fuels	-	-
3: Crude oil+ Petroleum products	23.528	23.528
4: Ores, metal waste	3.061	3.061
5: Metal products	364.609	364.609
6: Building minerals & material	283.390	283.390
7: Fertilizers	3.933	3.933
8: Chemicals	497.589	497.589
9: Machinery & other manufacturing	1.979.246	1.979.246
Total	5.380.799	5.380.799

**Figure 23.1 Maximum level of LGVs in the Road Transport market of Portugal**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

#### Remarks:

Contact information:

Organisation	Contactperson	Adress	Telno.
<Name>	0		

## RO: Romania

1. Some general (road transport related) figures (collect the most recent figures)

**Table 24.1 General data**

	Quantity
Area	238,4 thousand km <sup>2</sup>
Population	21,5 million (2009)
GDP	€ 135,3 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 24.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	281	2007
"Production" (mln tonkms)	32.100	2007
Goods vehicles (active fleet )	467.280	2007
< 3 tonne MLC	missing	
3-7 tonne MLC	missing	
> 7 tonne MLC	missing	

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

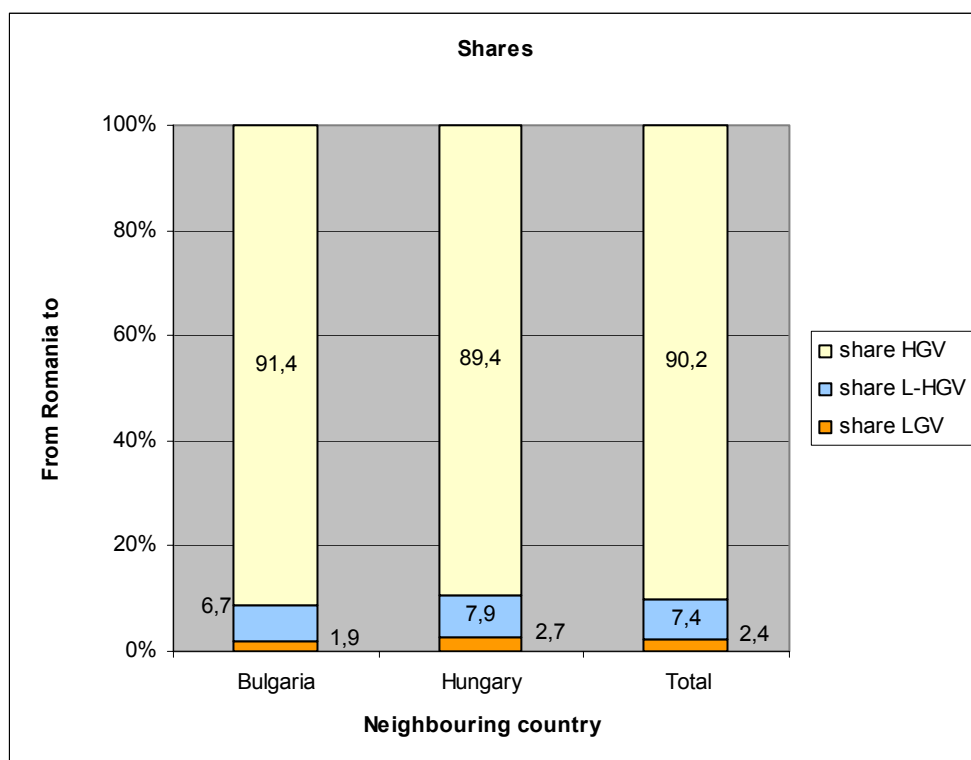
Table: road\_eqs\_lorum

2. Share of LGVs (NSTR1 classification)

**Table 24.3 Bilateral road transport from Romania to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Bulgaria	Hungary	Total
0: Agricultural products	59.788	91.359	151.147
1: Foodstuffs	28.595	116.131	144.726
2: Solid mineral fuels	477	-	477
3: Crude oil+ Petroleum products	506.454	247.696	754.150
4: Ores, metal waste	32.445	8.946	41.391
5: Metal products	40.141	96.053	136.194
6: Building minerals & material	44.024	369.997	414.021
7: Fertilizers	3.701	136.221	139.922
8: Chemicals	167.041	120.926	287.967
9: Machinery & other manufacturing	107.372	262.266	369.638
Total	990.038	1.449.595	2.439.633

**Figure 24.1 Maximum level of LGVs in the Road Transport market of Romania**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 24.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	<b>NO.</b> Such policy and legislation are necessary as, in Romania, such transport has a wide range and should be closely observed in terms of fair competition and improving working conditions for drivers.
UNTRR	In Romania there is no policy/legislation that address international transport of goods by LGV We don't consider necessary any regulation in this respect.
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Council Directive 96/26/EC has been transposed into the Romanian legislation by the Expeditious Government Ordinance no. 109 of 14 July 2005 on road transport approved by Law no. 102 of 25 April 2006, and subsequently amended by: <ul style="list-style-type: none"> <li>Expeditious Government Ordinance no. 73 of 20 September 2006 for the prorogation article 70 paragraph (2) of Expeditious Government Ordinance no. 109/2005 on road transport provisions;</li> <li>Government Ordinance no. 45 of 28 August 2007 for the amendment and</li> </ul>



	<p>completion of Expeditious Government Ordinance no. 109/2005 on road transport, approved by Law no. 42 of 19 March 2008;</p> <ul style="list-style-type: none"> <li>• Expeditious Government Ordinance no. 74 of 11 June 2008 for the amendment and completion of Expeditious Government Ordinance no. 109/2005 on road transport, approved by Law no. 218 of 2 June 2009.</li> </ul>
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>The general framework for the admission to the occupation of road transport operator, for establishing, ensuring and performing road transport activities. This legal document represents the general framework for the organisation, carrying out and to ensure the smooth development of safe and quality road transport of goods and passengers on the Romanian territory, with the respect of free competition and environment protection principles, of legitimate rights and interests of natural and legal persons, and to satisfy the needs of national economy and of country defence. It does not include any reference to LGVs.</p>
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	<p>In respect of road user charges the Directive 1999/62/EC has been transposed into the Romanian legislation by Government Ordinance no. 15 of 24 January 2002 on the introduction of certain user charges for the road transport infrastructure approved by Law no. 424 of 27 June 2002, and subsequently amended by:</p> <ul style="list-style-type: none"> <li>• Government Ordinance no. 51 of 23 July 2004 for the amendment and completion of Government Ordinance no. 15/2002 on the introduction of road user charge on the Romanian national roads network approved by Law no. 451 of 18 October 2004;</li> <li>• Law no. 101 of 19 April 2007 for the amendment of Government Ordinance 15/2002 on the introduction of user charge for the Romanian national road network;</li> <li>• Expeditious Government Ordinance no. 157 of 19 December 2007 for the amendment and completion of Government Ordinance 15/2002 on the introduction of user charge for the Romanian national road network approved by Law no. 61 of 1 April 2009.</li> </ul> <p>In respect of vehicle tax the Directive 1999/62/EC has been transposed into the Romanian legislation by Law 571 of 22 December 2003 on Fiscal Code, and subsequently amended by:</p> <ul style="list-style-type: none"> <li>• Law no. 174 of 17 May 2004 for the approval of Government Ordinance no. 92/2003 on fiscal procedure Code;</li> <li>• Expeditious Government Ordinance no. 203 of 22 December 2005 for the amendment and completion of Law 571/2003 on Fiscal Code approved by Law no. 162 of 15 May 2006;</li> <li>• Expeditious Government Ordinance no. 21 of 16 March 2006 for the amendment of Law 571/2003 on Fiscal Code approved by Law no. 314 of 12 July 2006;</li> <li>• Expeditious Government Ordinance no. 33 of 19 April 2006 for the amendment and completion of Law 571/2003 on Fiscal Code approved by Law no. 317 of 14 July 2006;</li> <li>• Law no. 343 of 17 July 2006 for the amendment and completion of Law 571/2003 on Fiscal Code;</li> <li>• Government Decision no. 1514 of 25 October 2006 on the levels of taxable</li> </ul>

	<p>values, taxes and local taxes and other taxes that can be assimilated with these, as well as the fines that can be applied during the fiscal year 2007;</p> <ul style="list-style-type: none"> <li>Government Decision no. 956 of 19 August 2009 on the levels of taxable values, taxes and local taxes and other taxes that can be assimilated with these, as well as the fines that can be applied during the fiscal year 2010.</li> </ul> <p>In respect of tolls the Directive 1999/62/EC has been transposed into the Romanian legislation by Government Ordinance no. 43 of 28 August 1997 on legal regime of roads approved by Law no. 82 of 15 April 1998, and subsequently amended by:</p> <ul style="list-style-type: none"> <li>Government Ordinance no. 79 of 30 August 2001 for the amendment and completion of Government Ordinance no. 43/1997 on legal regime of roads approved by Law no. 413 of 26 June 2002;</li> <li>Government Ordinance no. 26 of 20 January 2003 for the amendment and completion of Government Ordinance no. 43/1997 on legal regime of roads approved by Law no. 227 of 23 May 2003.</li> </ul>
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>Government Ordinance no. 15 of 24 January 2002 on the introduction of certain user charges for the road transport infrastructure has as purpose the introduction of road user charges that will be used to finance the national roads construction, modernisation, maintenance and repairing works.</p> <p>Law 571 of 22 December 2003 on Fiscal Code provides for, among others, the vehicle tax and its value.</p> <p>Government Ordinance no. 43 of 28 August 1997 on legal regime of roads introduces the tolls for crossing the bridges over the Danube.</p> <p>All three legal documents apply to all kind of vehicles, starting with motorcycles up to HGVs.</p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	<p>Regulation (EC) 561/2006 and Regulation (EEC) 3821/85 were taken into the Romanian legislation by Government Ordinance no. 37 of 7 August 2007 on the establishment of the framework for the application of rules on driving times, breaks and rests of drivers and the use of recording equipment for their activity approved by Law no. 371 of 21 December 2007 and subsequently amended by Government Ordinance no. 21 of 29 August 2009.</p>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>Establishing the framework for the application of regulations on driving hours, breaks and resting periods of drivers performing road transport activities within the scope of Regulation (EC) No 561/2006, and the framework for the use of the recording equipment of driving hours, breaks and resting periods of drivers.</p> <p>This law does not include LGVs.</p>
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
MIN	Yes, international freight transport by LGVs represents a serious issue that causes unfair competition.

UNTRR	Not at all. There is the problem of bigger companies which can't re-organize in order to offer flexible services as provided by smaller ones. From a fiscal point of view, potential verifications could be performed.
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	Yes, in order to ensure fair competition and improve the working conditions of the drivers performing road transport.
	No

**Remarks:**

Contact information:

<b>Organisation</b>	<b>Contactperson</b>	<b>Adress</b>	<b>Telno.</b>
Romanian Road Transport Authority – ARR, Ministry of Transports and Infrastructure, Bucharest, Romania.	Mr Traian Popa, Head of Office for Inspection, Control and Statistics in Passenger Road Transport,		<a href="mailto:ptraian@gmail.com">ptraian@gmail.com</a>
National Union of Road Hauliers from Romania (UNTRR)	Radu Dinescu Secretary General		Ioana.Ciorzan@untrr.ro



## SK: Slovak Republic

### 1. Some general (road transport related) figures.

**Table 25.1 General data**

	Quantity
Area	49,0 thousand km <sup>2</sup>
Population	5,4 million (2009)
GDP	€ 64,8 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 25.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	328	2007
"Production" (mln tonkms)	12.934	2007
Goods vehicles (active fleet )	163.067	2003
< 3 tonne MLC	missing	
3-7 tonne MLC	missing	
> 7 tonne MLC	missing	

MLC= Maximum Loading Capacity

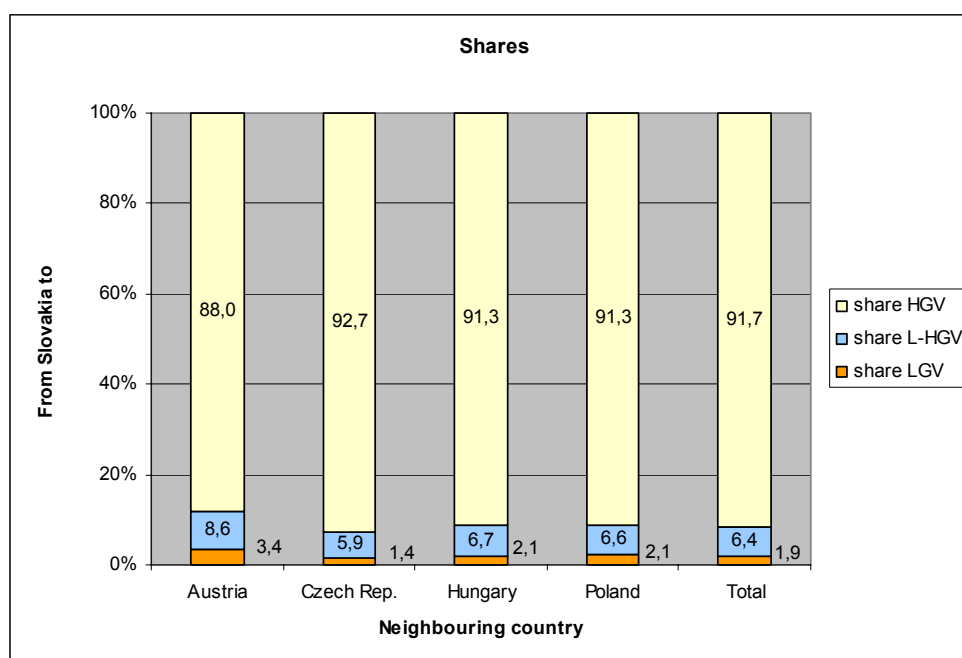
Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt; Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 25.3 Bilateral road transport from Slovakia to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Austria	Czech Rep.	Hungary	Poland	Total
0: Agricultural products	365.164	353.480	203.592	354.033	1.276.269
1: Foodstuffs	107.924	625.571	183.601	186.799	1.103.895
2: Solid mineral fuels	-	-	213	-	213
3: Crude oil+ Petroleum products	19.778	1.542.942	362.696	695.642	2.621.058
4: Ores, metal waste	-	42.503	93.644	18.747	154.894
5: Metal products	104.506	1.275.750	257.577	755.742	2.393.575
6: Building minerals & material	264.098	2.069.880	531.751	317.372	3.183.101
7: Fertilizers	3.373	240.543	120.768	1.305	365.989
8: Chemicals	118.973	492.994	91.058	258.596	961.621
9: Machinery & other manufacturing	305.653	550.607	278.854	398.480	1.533.594
Total	1.289.469	7.194.270	2.123.754	2.986.716	13.594.209

**Figure 25.1 Maximum level of LGVs in the Road Transport market of Slovakia**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 25.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	No, we have only policy which is on EU level.
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Council directive 96/26 is implemented in Slovak Republic by Act No 168/1996 Coll. on the Road transport and by Decree of Ministry of Transport, Posts and Telecommunications of the Slovak Republic No. 311/ 1996 Coll. implementing the Act of the National Council of the Slovak Republic No 168/1996 Coll. on the road transport. Please find enclosed act No 168/1996 Coll. and Decree No 311/1996 Coll. in English version.
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p><b>Subject of the Act is:</b></p> <p>(1) This Act lays down conditions of business activities in road transport and of the scope of competence for the state administration bodies in road transport and for self-administration regions and municipalities (hereinafter referred to as the „administrative body“).</p> <p>(2) This Act, except for the Articles 20, 21a and 21b paragraph 2, does not apply to:</p> <ul style="list-style-type: none"> <li>a) the road transport carried out by other than motor vehicles;</li> <li>b) the road transport which cannot be considered a business activity;</li> <li>c) the business road transport carried out by legal and natural persons exclusively</li> </ul>

	<p>for their own purpose.</p> <p>d) freight road transport carried out by road goods vehicles, which total mass including the trailer does not exceed 3,5 t,</p> <p>e) passenger road transport carried out by road passenger vehicles, the total occupancy of which does not exceed nine persons, including the driver except for the taxi service vehicles.</p>
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Directive No 1992/62/EC is implemented in Slovak Republic by Act No 135/1961 Coll. This act we have only in Slovak language.
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>This Act shall establish</p> <p>a) building, use, and protection of Roads.</p> <p>discretions and duties owners and receiver and user of Roads</p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	<p>This legislation is covered in our law by Act No 461/2007 Coll. on use of the recording equipment in road transport and in law No. 462/2007 Coll. on the Organisation of Working Time in transport and on amendments of the Act No 125/2006 Coll. on Labour Inspection and on amendments of the Act No 82/2005 Coll. On Illegal Work and Employment and on amendments of some Acts, as amended by the Act No 309/2007 Coll.. Please find both in English version.</p>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>Act No 462/2007 Coll.</p> <p>Subject of the Act</p> <p>This Act shall establish the legal relations, not covered by special regulation<sup>1)</sup>, concerning:</p> <p>a) the range of obligations to install and use the recording equipment<sup>2)</sup> in motor vehicles<sup>3)</sup> (hereinafter referred to as the „vehicle“),</p> <p>b) the EC type-approval of the recording equipment, record sheets and memory cards used in recording equipment (hereinafter referred to as the „card“),</p> <p>c) the card issue, administration and central registration,</p> <p>d) the terms of installation and repair of the recording equipment and periodical surveys of installed recording equipment,</p> <p>e) the competence of State Administration Bodies.</p> <p>Act No 462/2007 Coll.</p> <p>(1) This Act shall establish</p> <p>a) minimum requirements in relation to the organisation of working time in transport,</p> <p>b) performances of the roadside inspections and the inspections in the transport undertaking premises,<sup>1)</sup></p> <p>c) competence of the State Administration Bodies in the matters of the check of organisation of working time in transport.</p> <p>(2) Unless otherwise provided in this Act, the Labour Code shall apply to the labour relations of the employees in transport.</p>

<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	No
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	No

**Remarks:**

Contact information:

<b>Organisation</b>	<b>Contactperson</b>	<b>Adress</b>	<b>Telno.</b>
Ministry of Transport, Posts and Telecommunications of the Slovak Republic.	Marek Hudec, senior adviser		+421 2 594 94 343 Marek.Hudec@telecom.gov.sk



## SI: Slovenia

### 1. Some general (road transport related) figures.

**Table 26.1 General data**

	Quantity
Area	20,3 thousand km <sup>2</sup>
Population	2,0 million (2009)
GDP	€ 37,1 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 26.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	579	2007
"Production" (mln tonkms)	8.612	2007
Goods vehicles (active fleet )	68.888	2007
< 3 tonne MLC	53.311	2007
3-7 tonne MLC	5.224	2007
> 7 tonne MLC	10.356	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

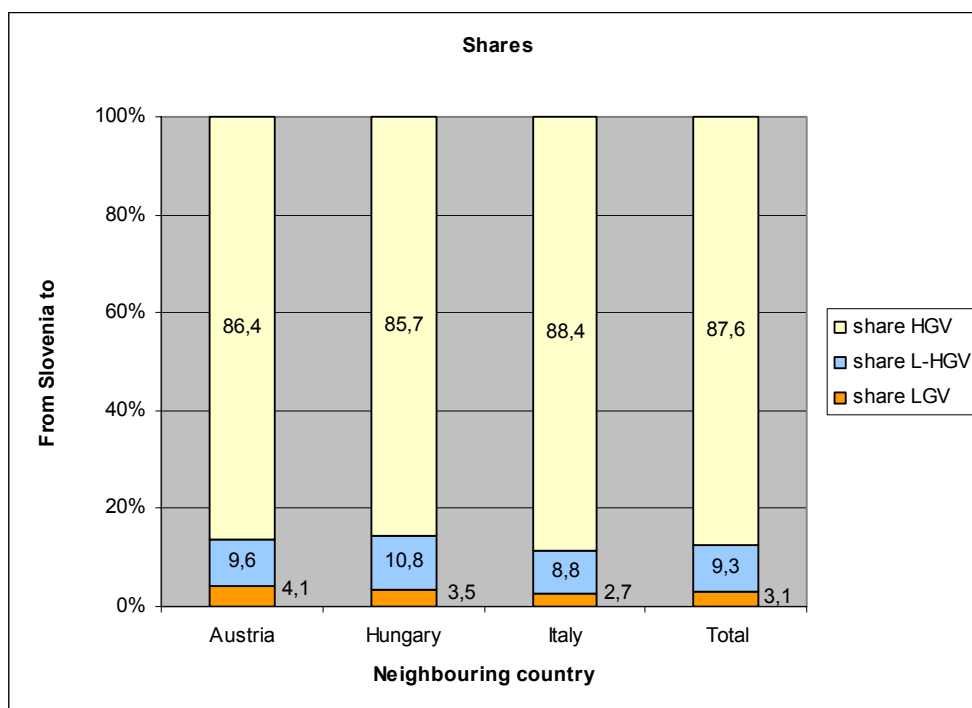
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 26.3 Bilateral road transport from Slovenia to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Austria	Hungary	Italy	Total
0: Agricultural products	262.423	4.111	583.794	850.328
1: Foodstuffs	57.667	270.309	1.014.062	1.342.038
2: Solid mineral fuels	-	-	-	-
3: Crude oil+ Petroleum products	-	7.082	-	7.082
4: Ores, metal waste	-	21	-	21
5: Metal products	81.083	36.010	112.913	230.006
6: Building minerals & material	71.172	44.553	322.283	438.008
7: Fertilizers	-	-	-	-
8: Chemicals	222.690	76.630	177.504	476.824
9: Machinery & other manufacturing	278.271	132.784	502.004	913.059
Total	973.306	571.500	2.712.560	4.257.366

**Figure 26.1 Maximum level of LGVs in the Road Transport market of Slovenia**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 26.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	No.
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	National transport law.
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	National transport law prescribed conditions and matters concerning carriages by road of goods and passengers in inland and international road transport operations. This law also regulates authorities for performing of enforcement regarding this law. No.
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Act on tolls for vehicles of which the maximum permissible gross laden weight exceeds 3,500 kg

<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>This Act regulates the obligation to a pay toll for the use of toll roads with a motor vehicle of which the maximum permissible gross laden weight exceeds 3,500 kg, irrespective of the maximum permissible gross laden weight of trailer vehicles, services for which this toll is not payable, the toll-rate category, method of determining the toll rates, method of tolling and the interoperability of tolling in free traffic flow, control of the collection of tolls and penalties for the breach of the obligation to pay a toll. This Act introduces into the legal order of Slovenia the following directives of the European Union:</p> <ul style="list-style-type: none"> <li>- Directive 1999/62/EC of the European Parliament and of the Council of 17 June 1999 on the charging of heavy goods vehicles for the use of certain infrastructures (OJ L no. 187 of 20 July 1999, page 42), as modified with the Directive 2006/38/EC of the European Parliament and of the Council of 17 May 2006 amending Directive 1999/62/EC on the charging of heavy goods vehicles for the use of certain infrastructures (OJ L no. 157 of 9 June 2006, page 8; named in the continuation of this Act: Directive 1999/62/EC);</li> <li>- Directive 2004/52/EC of the European Parliament and of the Council of 29 April 2004 on the interoperability of electronic road toll systems in the Community (OJ L no. 166 of 30 April 2004, page 124; named in the continuation of this Act: Directive 2004/52/EC).</li> </ul> <p>Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</p> <p>This Act regulates the obligation to a pay toll for the use of toll roads with a motor vehicle of which the maximum permissible gross laden weight exceeds 3,500 kg.</p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006 on Driving Times and Rest Period</u>, and <u>Regulation (EEC) 3821/85 on the Tachograph</u>, introduced in your country?</b>
	Act on Working Time and Compulsory Rest Periods of Persons Performing Mobile Road Transport Activities, and on Recording Equipment in Road Transport.
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>This law regulates responsible authorities, its tasks and responsibilities, records and fines regarding Regulations 561/06 and 3821/85. This law also regulates transposition of Directives 2006/22/EC and 2002/15/EC in Slovenian national law.</p> <p>No, because the LGVs are not in scope of European social legislation.</p>
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	No (at the moment).
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	Depend on the situation on the transport market in the future.

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
Ministry of Transport of Slovenia Langusova 4, 1535 Ljubljana	<b>Marjan Nahtigal, MSc, Undersecretary.</b>		Marjan.Nahtigal@gov.si

## ES: Spain

### 1. Some general (road transport related) figures.

**Table 27.1 General data**

	Quantity
Area	506,0 thousand km <sup>2</sup>
Population	45,8 million (2009)
GDP	€ 1.088,5 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 27.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	11.432	2004
"Production" (mln tonkms)	64.270	2007
Goods vehicles (active fleet )	4.210.213	2004
< 3 tonne MLC	3.783.395	2004
3-7 tonne MLC	126.911	2004
> 7 tonne MLC	299.907	2004

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

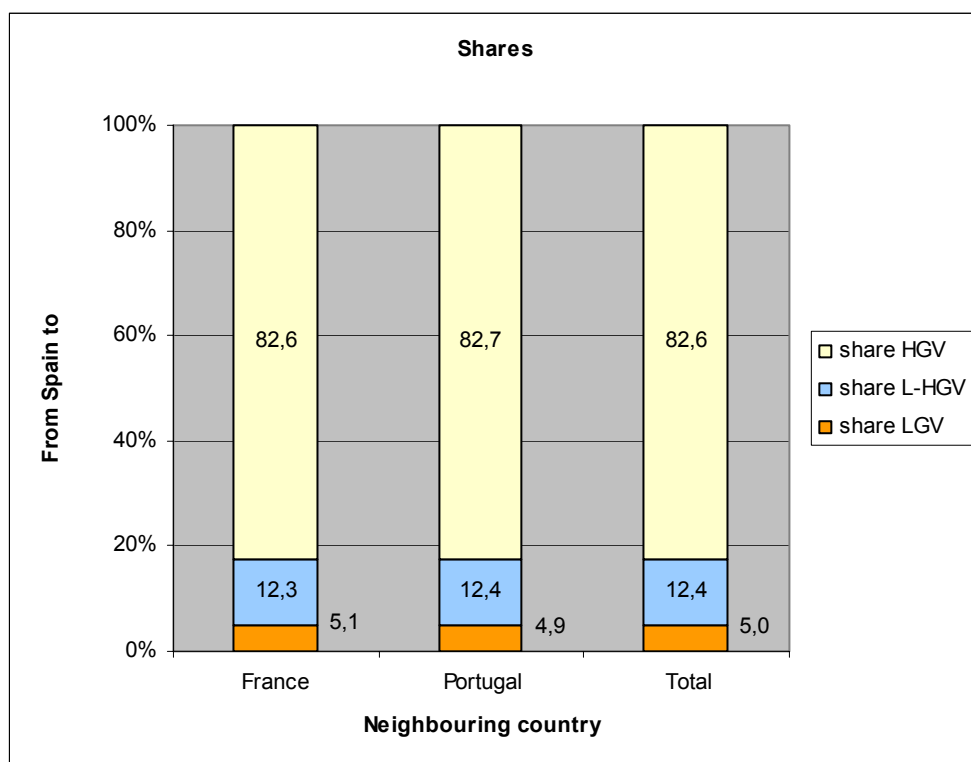
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 27.3 Bilateral road transport from Spain to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	France	Portugal	Total
0: Agricultural products	1.355.426	622.926	1.978.352
1: Foodstuffs	2.309.963	1.975.393	4.285.356
2: Solid mineral fuels	1.270	23	1.293
3: Crude oil+ Petroleum products	14.735	83.674	98.409
4: Ores, metal waste	1.279	1.189	2.468
5: Metal products	609.556	322.131	931.687
6: Building minerals & material	682.139	221.508	903.647
7: Fertilizers	5.200	2.432	7.632
8: Chemicals	1.151.219	521.368	1.672.587
9: Machinery & other manufacturing	3.568.883	2.029.751	5.598.634
Total	9.699.670	5.780.395	15.480.065

**Figure 27.1 Maximum level of LGVs in the Road Transport market of Spain**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 27.4 Results of the questionnaire**

**Remarks:**

Only the association ASTIC responded to the last questions, meaning they do not see it as a problem and do not need specific legislation to address LGVs.

Contact information:

Organisation	Contactperson	Adress	Telno.
ASTIC C/ Fernández de la Hoz, 78 - entrepanta - 28003, MADRID,	0		Tlf. 91 451 48 07 email: <a href="mailto:info@astic.net">info@astic.net</a>

## SE: Sweden

### 1. Some general (road transport related) figures.

**Table 28.1 General data**

	Quantity
Area	441,4 thousand km <sup>2</sup>
Population	9,3 million (2009)
GDP	€ 282,0 billion (2004)

Source: Eurostat Table: tps00001; teina010

**Table 28.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	1.806	2007
"Production" (mln tonkms)	3.614	2007
Goods vehicles (active fleet )	495.661	2007
< 3 tonne MLC	435.241	2007
3-7 tonne MLC	12.987	2007
> 7 tonne MLC	47.433	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

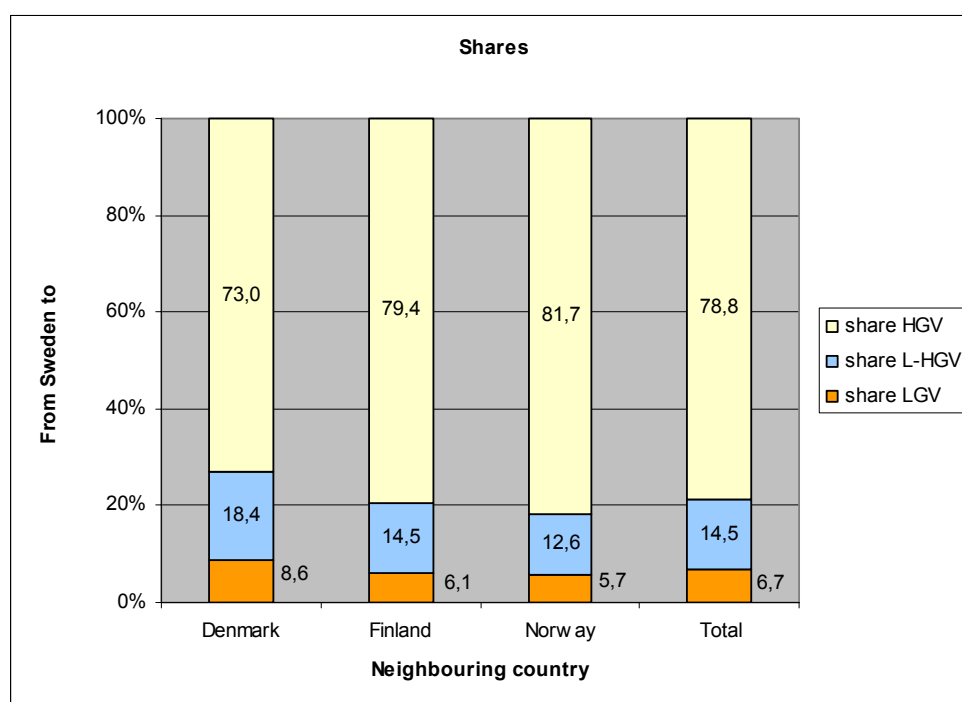
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 28.3 Bilateral road transport from Sweden to the neighbouring countries  
(Number of tonnes x1000; year= 2007)**

NSTR	Denmark	Finland	Norway	Total
0: Agricultural products	81.349	12.191	904.524	998.064
1: Foodstuffs	381.712	35.244	250.153	667.109
2: Solid mineral fuels	-	-	1.781	1.781
3: Crude oil+ Petroleum products	109	22.334	199.553	221.996
4: Ores, metal waste	-	-	7.583	7.583
5: Metal products	5.874	-	52.114	57.988
6: Building minerals & material	11.035	10.685	182.817	204.537
7: Fertilizers	-	-	10.475	10.475
8: Chemicals	122.617	5.705	340.776	469.098
9: Machinery & other manufacturing	1.105.739	71.859	1.437.738	2.615.336
Total	1.708.435	158.018	3.387.514	5.253.967

**Figure 28.1 Maximum level of LGVs in the Road Transport market of Sweden**  
(Share based on number of tonnes and product value per kilogram;  
year= 2007)



### 3. Results of the questionnaire on legislation.

**Table 28.4 Results of the questionnaire**

<b>1</b>	<b>Does your country have a specific policy and legislation to address international transport of goods by LGVs?</b>
MIN	<p>In our Commercial traffic law LGVs are included and covered by the same legislation based on the Directive 96/26/EG and there are no differences if you perform national or international transport of goods.</p> <p>When it comes to driving times we have a national legislation concerning resting times.</p> <p>(Förordning (1994:1297) om vilotider vid vissa vägtransporter inom landet)</p>
<b>2</b>	<b>By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?</b>
	Yrkestrafiklagen (1998:490)
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>The Commercial Traffic Law is build on a definition- when you place a vehicle with driver to someone's disposal on payment - you are obliged to have a permit for the kind of traffic you perform. Commercial traffic is classified in four different kinds:</p> <ol style="list-style-type: none"> <li>1. Transport of passengers on regular services</li> <li>2. Taxi</li> <li>3. Other transport of passengers than in 1.</li> </ol>



	<p>4. Transport of goods</p> <p>In p 4 LGVs are included.</p>
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC</u> on Road Charging introduced in your country?</b>
	Vägtrafikskattelagen (2006:227)
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	<p>Other vehicles than private cars, LGVs and light buses</p> <p>No, LGVs are included in another law - Lag (2006:228) med särskilda bestämmelser om fordonsskatt.</p>
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006</u> on Driving Times and Rest Period, and <u>Regulation (EEC) 3821/85</u> on the Tachograph, introduced in your country?</b>
	<p>Both this regulations are introduced in Sweden with their contents as published from EU. Allowed and necessary rules to execute this regulations, for example regarding controls,</p> <p>responsibility and competent authorities appears in Förordning (2004:865) om kör- och vilotider samt färdskrivare, m.m.</p>
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	The scope of this Förordning follows the scope of the EG-regulations - not includes LGV.
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	No
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	No

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
<b>Swedish Transport Agency</b> 781 23 Borlänge <a href="http://www.transportstyrelsen.se">www.transportstyrelsen.se</a> Tel: +46 771-503 503	Sören Dalmans  Road Traffic Department		Direkt: + 46 243-75175 Mobil: + 46 70-236 50 70 soren.dalmans@transport styrelsen.se

## CH: Switzerland

### 1. Some general (road transport related) figures.

**Table 29.1 General data**

	Quantity
Area	41,3 km <sup>2</sup>
Population	7,7 million (2009)
GDP	€ 341,5 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 29.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	1.341	2003
"Production" (mln tonkms)	1.527	2007
Goods vehicles (active fleet )	297.088	2004
< 3 tonne MLC	257.197	2004
3-7 tonne MLC	10.385	2004
> 7 tonne MLC	29.506	2004

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

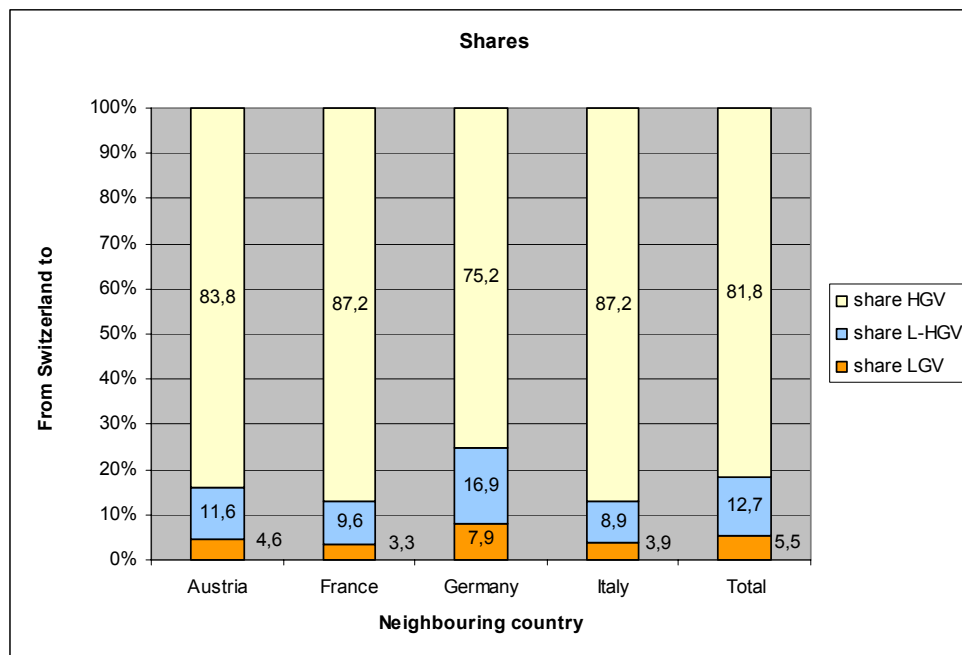
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 29.3 Bilateral road transport from Switzerland to the neighbouring countries (Number of tonnes x1000; year= 2007)**

NSTR	Austria	France	Germany	Italy	Total
0: Agricultural products	159.069	347.951	88.335	892.072	1.487.427
1: Foodstuffs	224.890	586.328	436.834	58.681	1.306.733
2: Solid mineral fuels	-	-	-	-	-
3: Crude oil+ Petroleum products	-	62	-	3.449	3.511
4: Ores, metal waste	-	-	-	133	133
5: Metal products	-	1.451	6.381	45.297	53.129
6: Building minerals & material	30.307	407.149	139.316	132.166	708.938
7: Fertilizers	-	-	-	-	-
8: Chemicals	126.368	496.238	873.376	204.535	1.700.517
9: Machinery & other manufacturing	262.892	519.443	2.147.429	540.883	3.470.647
Total	803.526	2.358.622	3.691.671	1.877.216	8.731.035

**Figure 29.1 Maximum level of LGVs in the Road Transport market of Switzerland**  
**(Share based on number of tonnes and product value per kilogram;**  
**year= 2007)**



3. Results of the questionnaire on legislation.

**Table 29.4 Results of the questionnaire**

**Remarks:**

Contact information:

Organisation	Contactperson	Adress	Telno.
<Name>	0		

## UK: United Kingdom

### 1. Some general (road transport related) figures.

**Table 30.1 General data**

	Quantity
Area	242,9 thousand km <sup>2</sup>
Population	61,6 million (2009)
GDP	€ 1821,8 billion (2008)

Source: Eurostat Table: tps00001; teina010

**Table 30.2 Length of motorways, "production" and (active) vehicle fleet .**

	Quantity	Year
Motorways (kms)	3.669	2007
"Production" (mln tonkms)	10.574	2005
Goods vehicles (active fleet )	2.600.000	2007
< 3 tonne MLC	2.460.000	2007
3-7 tonne MLC	90.000	2007
> 7 tonne MLC	50.000	2007

MLC= Maximum Loading Capacity

Source Eurostat. Table: ttr00002; Table: road\_go\_ia\_ltt & road\_go\_ia\_utt;

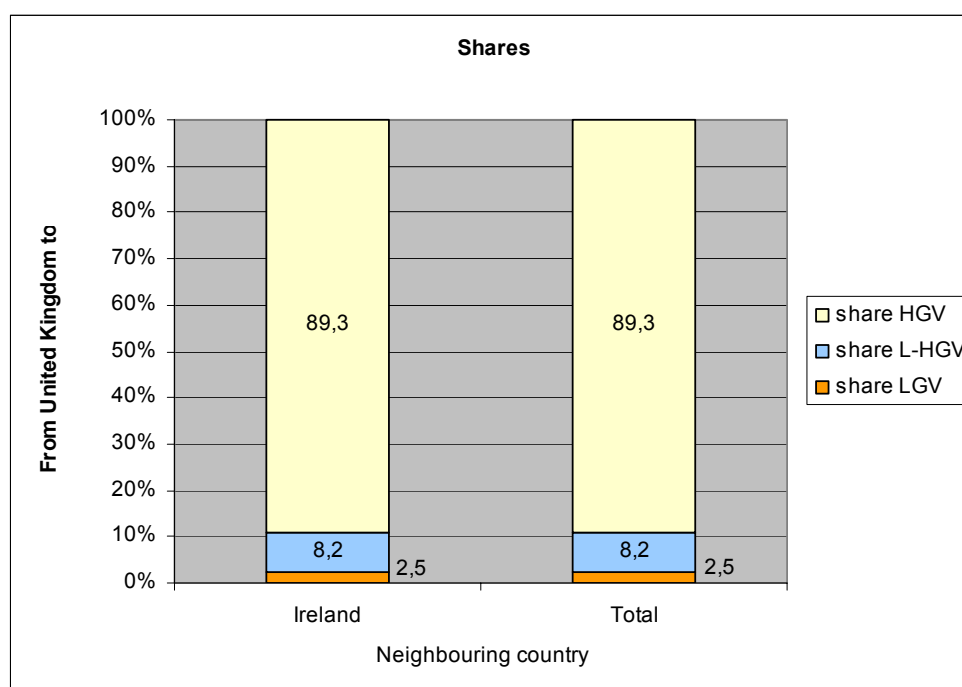
Table: road\_eqs\_lorlum

### 2. Share of LGVs (NSTR1 classification)

**Table 30.3 Bilateral road transport from the United Kingdom to the neighbouring countries (Number of tonnes x1000; year= 2007)**

NSTR	Ireland	Total
0: Agricultural products	29.688	29.688
1: Foodstuffs	81.873	81.873
2: Solid mineral fuels	2.881	2.881
3: Crude oil+ Petroleum products	144.573	144.573
4: Ores, metal waste	706	706
5: Metal products	29.640	29.640
6: Building minerals & material	100.058	100.058
7: Fertilizers	1.740	1.740
8: Chemicals	45.143	45.143
9: Machinery & other manufacturing	82.558	82.558
Total	518.860	518.860

**Figure 30.1 Maximum level of LGVs in the Road Transport market of the United Kingdom (Share based on number of tonnes and product value per kilogram; year= 2007)**



### 3. Results of the questionnaire on legislation.

**Table 30.4 Results of the questionnaire**

1	Does your country have a specific policy and legislation to address international transport of goods by LGVs?
MIN	LGVs operate in scope of the GB domestic drivers' hours rules which set daily driving and duty limits, and in some instances break requirements. The domestic rules apply to most goods and passenger vehicles that are not covered by the EU drivers' hours rules. A domestic review of these rules is currently being undertaken.
FTA	Not aware of any but unlikely to be an issue for Great Britain (excl. Northern Ireland) due to no land border with another Member State.
RHA	<p>Not international operation as such because few UK registered LGVs operate internationally. However, LGVs and their operation are specifically covered by Domestic Drivers Hours Rules and more general rules such as Health and Safety, Working Time and other legislation applied to industry as a whole. Details are at: <a href="http://www.dft.gov.uk/consultations/closed/domesticdrivershours/consultation.pdf">http://www.dft.gov.uk/consultations/closed/domesticdrivershours/consultation.pdf</a> especially paragraph 11 et seq.</p> <p>Further detailed research by the UK Transport Research Laboratory can be found at: <a href="http://www.trl.co.uk/online_store/reports_publications/trl_reports/cat_road_user_safety/report_the_relationship_between_driver_fatigue_and_rules_limiting_hours_of_driving_and_work.htm">http://www.trl.co.uk/online_store/reports_publications/trl_reports/cat_road_user_safety/report_the_relationship_between_driver_fatigue_and_rules_limiting_hours_of_driving_and_work.htm</a></p>
2	By which law is <u>Council Directive 96/26/EC</u> on admission to the occupation of road haulage operator introduced in your country?

	Public Passenger Vehicles Act 1981, Transport Act 1985, Goods Vehicles (licensing of operators) Act 1995, PSV operators (qualifications) Regulations 1999 1999/2431, Goods Vehicle Operators (Qualifications) Regulations 1999/2430
<b>3</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	The scope applies to combination of vehicles that exceed 3.5 tonnes, and in addition to the hire and reward sector includes own account operators in Great Britain.
<b>4</b>	<b>By which law is <u>Directive 1999/62/EC on Road Charging</u> introduced in your country?</b>
	Until recently road charging has been introduced through specific road toll measures. The UK has accepted the Interoperability Directive but has yet to initiate schemes to make use of it.
<b>5</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Existing road tolls apply to all vehicles, albeit at different rates depending on size and other factors.
<b>6</b>	<b>By which piece/s of legislation are <u>Regulation (EC) 561/2006 on Driving Times and Rest Period</u>, and <u>Regulation (EEC) 3821/85 on the Tachograph</u>, introduced in your country?</b>
	Statutory Instrument (S.I.) 2007 Number 1819 introduces Regulation (EC) 561/2006, and is the most recent update to Regulation (EEC) 3821/85.
<b>7</b>	<b>What is the exact scope of this law? Does this law also include (partly) LGVs? If so, for what reasons and for which categories of vehicles?</b>
	Full details of the national derogations taken up by the UK in relation to 561/2006 can be found on the Commission's website. Neither this nor 3821/85 apply to LGVs.
<b>8</b>	<b>Do you regard international freight transport by LGVs (as an alternative for regular road transport of goods by HGVs) as a serious issue e.g. causing unfair competition?</b>
	No, we do not regard it as a serious issue and Industry have not raised any issues / concerns with us regarding international journeys undertaken by LGVs.
	Not an issue for Great Britain due to no land border and most likely to be uneconomical to use these vehicles for international work.
	<p>1. This is not a serious problem in the UK if existing regulations are properly enforced. In fact we consider that the national LGV rules are more stringent than the EU HGV rules. Therefore, there is generally no competitive advantage operating LGVs rather than HGVs. However, there may be times when LGV operation is more attractive when legislation prevents full HGV operational flexibility. See paragraph 4 below.</p> <p>2. In one or two cases LGV road haulage may seem to be competitive for high value, "just in time" cargoes but again because the more significant costs, particularly driver costs, have to be amortised across a smaller load than for HGVs, and Working Time has to be taken into account by any LGV operator, LGVs competitive advantage is, at best, confined to very specific routes and times. Even then, the advantage is often more apparent than real because operators often do not know their costs or are operating so illegally that no rule structure would make their operation compliant anyway. Proper roadside enforcement would. In our view any competitive LGV/HGV advantage between legitimate operators is, at best, marginal.</p> <p>3. That said, in some cases we are not comparing like with like. Some countries already treat LGVs and HGVs alike and enforce national rules to both, higher than those of adjacent countries. We see this so-</p>

	<p>called "gold-plating" in load securing in Germany, where enforced local loading standards are considerably greater than those of some of its neighbours. Therefore, foreign LGV operators might well have an advantage. However, rather than enforce higher, superfluous rules, a more sensible solution would be to apply sensible and proportionate rules. But these may prove more difficult for the Commission to introduce for political reasons. Indeed, they have in the past.</p> <p>4. One of the consequences of increasing burdens on vehicles &gt;3.5t is that it may seem to be more attractive to use LGVs in urban areas than the smaller HGVs. This dynamic of the road haulage market will grow if freight distribution centres near urban areas are encouraged and result in more urban congestion than now, particularly in day time operation. If LGV rules are raised this will drive urban freight traffic into even smaller and overloaded vehicles, thus increasing congestion, risking safety and making many urban centres unattractive for freight movements or related businesses.</p> <p>5. Enforcing existing vehicle roadworthiness and basic load securing rules would achieve most LGV enforcement objectives and, in large measure, address any competitive issue where it may exist. Installing new LGV technology e.g. tachographs, as opposed to using logbooks as now, would be burdensome and unnecessary since, in our experience, working time is a greater factor in LGV operation than driving time unlike HGV operation where, for most professional drivers, driving time is more important.</p>
<b>9</b>	<b>Do you consider additional action (legislation) necessary to address the issue of LGVs?</b>
	No, we already have domestic legislation in place which covers this sector.
	No
	No

**Remarks:**

Contact information:

Organisation	Contactperson	Address	Telno.
Freight and Logistics Division, UK Department for Transport.	David Glinos, Head of Road Haulage Employment team,		David.Glinos@dft.gsi.gov.uk
FTA	Joan Williams – Head of Road freight and Enforcement policy, Chris Yarsley, Manager – Road freight, Enforcement and EU Affairs,		<a href="mailto:cyarsley@fta.co.uk">cyarsley@fta.co.uk</a> , Tel: +32 2 231 0321. <a href="mailto:jwilliams@fta.co.uk">jwilliams@fta.co.uk</a> , Tel: +441786 457505.
RHA	P J Cullum Head of International Affairs Road Haulage Association Roadway House 35 Monument Hill Weybridge Surrey KT13 8RN		Tel: +44-1932-841515 Fax: +44-1932-854526 E Mail: p.cullum@rha.uk.net



## Annex 4 Enquête sur l'utilisation des Véhicules Utilitaires Légers





MINISTÈRE DES TRANSPORTS  
DE L'ÉQUIPEMENT  
DU TOURISME ET DE LA MER

Direction des Affaires Economiques et Internationales  
Service Economie Statistiques et Prospective

Véhicule soumis à l'enquête

## ENQUÊTE SUR L'UTILISATION EN 2005 - 2006 DES VÉHICULES UTILITAIRES LÉGERS

Vu l'avis favorable du Conseil National de l'Information Statistique, cette enquête, reconnue d'intérêt général et de qualité statistique, est obligatoire.

Visa n°2006 A054TR du Ministre des Transports, de l'équipement, du tourisme et de la mer et du Ministre chargé de l'Economie, des finances et de l'industrie, valable pour l'année 2006.

V  
U  
L

**A1** - SI VOUS ETES L'UTILISATEUR DE CE VÉHICULE ET S'IL EST TOUJOURS EN SERVICE, veuillez compléter les deux cadres ci-dessous :

<p>DANS LE CAS OÙ VOUS ÊTES :</p> <ul style="list-style-type: none"> <li>une entreprise (société, entreprise individuelle, artisan, ...)</li> <li>une collectivité territoriale</li> <li>une association</li> </ul> <p>Veuillez corriger, si nécessaire :</p> <p>- votre n° SIREN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/></p> <p>- votre code APE <input type="text"/> <input type="text"/> <input type="text"/></p>	<p>DANS TOUS LES CAS :</p> <p>Ce véhicule est-il ? (cocher la case qui convient)</p> <p><input type="checkbox"/> - votre propriété ou détenu dans le cadre d'un contrat de crédit-bail ou de location financière</p> <p><input type="checkbox"/> - pris en location</p> <p style="text-align: center; background-color: green; color: white; padding: 5px;">et renseigner les pages suivantes</p>
--	---

**A2** - SI VOUS DÉTENEZ CE VÉHICULE ET S'IL EST DÉFINITIVEMENT HORS D'USAGE DE CIRCULATION, veuillez cocher la case ☐ et renvoyer le questionnaire

**L** - SI VOUS AVEZ DONNÉ CE VÉHICULE EN LOCATION DE PLUS D'UN AN EN 2005  
veuillez indiquer le nom et l'adresse du locataire de longue durée .....  
puis nous renvoyer le questionnaire afin de le transmettre au locataire

**M** - SI CE VÉHICULE EST DESTINÉ À LA LOCATION DE COURTE DURÉE (moins d'un an),  
veuillez cocher la case ☐, compléter le cadre A1 ci-dessus et renseigner le questionnaire pour les cadres 1 et 2 de la page 2

**B** - SI VOUS NE DÉTENEZ PLUS CE VÉHICULE, veuillez cocher la case et compléter le cadre ci-dessous :

<p>VÉHICULE MIS À LA CASSE <input type="checkbox"/> le ..... VÉHICULE VENDU EN ÉTAT DE MARCHÉ <input type="checkbox"/></p> <p>Nom et adresse de l'acheteur.....</p>			
<p style="background-color: green; color: white; padding: 5px;">Si vendu ou mis à la casse après le 1.1.2006, veuillez renseigner les pages suivantes Si vendu ou mis à la casse avant le 1.1.2006, veuillez renvoyer le questionnaire</p> <p style="font-size: 2em; color: green;">➔</p>			
<p>Cachet de l'entreprise</p>	<p>Ce questionnaire correctement rempli doit être renvoyé, dans les 8 jours suivant la fin de la semaine d'enquête, à l'aide de l'enveloppe jointe à :</p> <p style="text-align: center;"><b>MINISTÈRE DES TRANSPORTS, DE L'ÉQUIPEMENT, DU TOURISME ET DE LA MER</b> <b>CETE Normandie Centre</b> <b>Groupe Statistique des Transports</b> <b>76129 LE GRAND QUEVILLY CEDEX</b></p>		
<table border="1" style="width: 100%;"> <tr> <td style="width: 60%;"> <p>Personne à contacter pour précisions éventuelles</p> <p>M. : .....</p> <p>Fonction : .....</p> <p>Tél. : ..... Mél : .....</p> </td> <td style="width: 40%;"> <p>A ..... Le ..... Signature</p> </td> </tr> </table>		<p>Personne à contacter pour précisions éventuelles</p> <p>M. : .....</p> <p>Fonction : .....</p> <p>Tél. : ..... Mél : .....</p>	<p>A ..... Le ..... Signature</p>
<p>Personne à contacter pour précisions éventuelles</p> <p>M. : .....</p> <p>Fonction : .....</p> <p>Tél. : ..... Mél : .....</p>	<p>A ..... Le ..... Signature</p>		

Aux termes de l'article 6 de la loi n° 51-711 du 7 juin 1951 modifiée sur l'obligation, la coordination et le secret en matière de statistique, les renseignements transmis en réponse au présent questionnaire ne sauraient en aucun cas être utilisés à des fins de contrôle fiscal ou de répression économique.  
L'article 7 de la loi précitée stipule d'autre part que tout défaut de réponse ou une réponse sciemment inexacte peut entraîner l'application d'une amende administrative.  
Questionnaire confidentiel destiné au Service Economie Statistiques et Prospective MTETM - DAEI Tour Pascal A - 92055 La Défense CEDEX  
La loi n°78-17 du 6 janvier 1978 modifiée, relative à l'informatique, aux fichiers et aux libertés, s'applique aux réponses faites à la présente enquête par les entreprises individuelles. Elle leur garantit un droit d'accès et de rectification pour les données les concernant. Ce droit peut être exercé auprès du Service Economie Statistiques et Prospective MTETM - DAEI Tour Pascal A - 92055 La Défense CEDEX.

## 1. KILOMÉTRAGE DU VÉHICULE

<b>A. Pour le propriétaire ou l'utilisateur principal (en cas de location de longue durée)</b>
1. Indiquer : le nombre de kilomètres parcourus <b>en 2005</b> : ..... km
2. Indiquer le kilométrage au compteur du véhicule à la date <b>d'aujourd'hui</b> : ..... km (si vous ne le possédez plus, donnez-le à la date de la vente et précisez cette date : jour, mois, année) : ____/____/____
<b>B. Uniquement pour le propriétaire du véhicule</b>
Indiquer le kilométrage du véhicule <b>quand vous l'avez acheté</b> (cf. carnet d'entretien): ..... km et préciser la date d'achat (jour, mois, année) : ____/____/____

<b>C. Veuillez préciser la nature des trajets</b> (plusieurs réponses possibles - cochez la ou les cases qui conviennent, en complétant suivant les cas) et indiquer approximativement les pourcentages du kilométrage annuel correspondant.	
a. Utilisez-vous ce véhicule? 1 <input type="checkbox"/> en agglomération..... % 2 <input type="checkbox"/> sur route ou autoroute..... % 3 <input type="checkbox"/> sur site fermé..... % 4 <input type="checkbox"/> autre à préciser..... % <div style="text-align: right;"><b>100 %</b></div>	b. Veuillez préciser s'il s'agit de trajets : 1 <input type="checkbox"/> locaux ou régionaux <i>(dans un rayon de moins de 150 km, y compris les trajets frontaliers)</i> ..... % 2 <input type="checkbox"/> nationaux <i>(dans un rayon de plus de 150 km)</i> ..... % 3 <input type="checkbox"/> internationaux <i>(non compris frontaliers)</i> ..... % <div style="text-align: right;"><b>100 %</b></div>

## 2. CONSOMMATION DE CARBURANT

<b>A. Nature du carburant principal utilisé</b> (veuillez cocher la case qui convient)	
1 <input type="checkbox"/> Gazole 2 <input type="checkbox"/> Supercarburant sans plomb (95) 3 <input type="checkbox"/> Supercarburant sans plomb (98) 4 <input type="checkbox"/> Supercarburant ARS	5 <input type="checkbox"/> Gaz de pétrole liquéfié (GPL) ou bicarburation 6 <input type="checkbox"/> Gaz naturel pour véhicule (GNV) 7 <input type="checkbox"/> Électricité 8 <input type="checkbox"/> Autre à préciser : .....
<b>B. Veuillez indiquer la consommation moyenne en référence au carburant indiqué ci-dessus</b>	
. Supercarburant ou gazole .....	litres / 100 km
. Gaz de pétrole liquéfié (GPL) ou gaz naturel pour véhicule (GNV) .....	GPL : litres / 100 km GNV : kg / 100 km
. Électricité .....	kWh / 100 km

## 3. SI LE VEHICULE EST A USAGE EXCLUSIVEMENT NON PROFESSIONNEL

<b>A. Veuillez indiquer votre catégorie socioprofessionnelle d'une manière précise</b>
agriculteurs exploitants ; artisans, commerçants ; professions libérales, chefs d'entreprise, cadres moyens, cadres supérieurs, autres professions intellectuelles supérieures ; enseignants, représentants de commerce, autres professions intermédiaires ; employés ; ouvriers ; retraités ; autres personnes sans activité professionnelle ..... .....
<b>B. Veuillez préciser tous les usages non professionnels du véhicule</b> (plusieurs réponses possibles - cochez la ou les cases qui conviennent):
1 <input type="checkbox"/> Domicile - école 2 <input type="checkbox"/> Courses - achats 3 <input type="checkbox"/> Loisirs, tourisme 4 <input type="checkbox"/> Autres à préciser : ..... .....

**Si le véhicule est à usage professionnel, veuillez renseigner les pages suivantes, sinon renvoyer le questionnaire.**

#### 4. SI LE VEHICULE EST A USAGE PROFESSIONNEL

**A. Veuillez préciser tous les usages du véhicule (plusieurs réponses possibles - cochez la ou les cases qui conviennent) :**

Code	Case à cocher	Libellé
<b>1</b>		<b>Domicile - travail</b>
<b>11</b>	<input type="checkbox"/>	Déplacements <b>du domicile au lieu de travail</b> et vice-versa (lorsque le lieu de travail est fixe : magasin, atelier, bureau, ...)
<b>2</b>		<b>Transport de biens pour motifs professionnels hors transport de marchandises</b>
<b>21</b>	<input type="checkbox"/>	Transport d'outillage ou d'échantillons pour votre travail
<b>22</b>	<input type="checkbox"/>	Transport de matériaux pour votre travail
<b>23</b>	<input type="checkbox"/>	Transport de gravats et de déchets
<b>3</b>		<b>Transport de marchandises pour motifs professionnels</b>
<b>31</b>	<input type="checkbox"/>	Livraisons ou ramassage pour <b>compte propre</b> (c'est-à-dire de marchandises vendues par vous ou achetées à vos fournisseurs)  • veuillez préciser la nature de la principale marchandise transportée : (courrier, petits colis de messagerie, pain, viande, autres produits alimentaires, électroménager, etc...) ..... .....
<b>32</b>	<input type="checkbox"/>	Transport de marchandises pour <b>compte d'autrui</b> (pour tiers contre rémunération).  • veuillez préciser le type d'activité pratiquée : (plusieurs réponses possibles - cochez la ou les cases qui conviennent)  <input type="checkbox"/> Parcours terminaux de messagerie (dans le cadre d'un réseau organisé de messagerie multi-clients, ce sont les parcours terminaux de « ramasse » et/ou de distribution)  <input type="checkbox"/> Course à la demande (va de l'intra-urbain à l'international, généralement occasionnelle, parfois régulière)  <input type="checkbox"/> Autres transports pour compte d'autrui, à préciser (tournées pour client unique, distribution dédiée aux particuliers, etc...) ..... .....  • veuillez indiquer le nombre de colis transportés en moyenne par jour : _____ coli
<b>4</b>		<b>Autres déplacements professionnels</b>
<b>41</b>	<input type="checkbox"/>	Transport de personnel ou de clientèle
<b>42</b>	<input type="checkbox"/>	Autres, à préciser (déplacements sur chantier, visite aux clients, dépannage, marchés, etc...) : ..... .....
<b>5</b>		<b>Déménagements</b>
<b>51</b>	<input type="checkbox"/>	Déménagements
<b>6</b>		<b>Déplacements non professionnels</b>
<b>61</b>	<input type="checkbox"/>	Déplacements non professionnels

Si vous avez coché plusieurs cases dans le cadre ci-dessus, veuillez indiquer le code de la case correspondant à l'usage principal :  **| \_ | \_ |**

**B. Veuillez indiquer approximativement les pourcentages du kilométrage annuel correspondant aux usages cochés ci-dessus**

1	Aux déplacements <b>du domicile au lieu de travail</b> et vice-versa (lorsque le lieu de travail est fixe : magasin, atelier, bureau, ...) : .....	%
2	Aux <b>transports de biens pour motifs professionnels, hors marchandises</b> : .....	%
3	Aux <b>transports de marchandises pour motifs professionnels</b> : .....	%
4	Aux <b>autres déplacements professionnels</b> : .....	%
5	Aux <b>déménagements</b> : .....	%
6	Aux <b>déplacements non professionnels</b> (loisirs, etc...) : .....	%
		<b>100 %</b>

Chaque ligne correspond à un aller-retour.

Vous trouverez au verso de la lettre d'envoi des exemples de description de déplacements, avec la possibilité de décrire en circuits des opérations complexes.

- |   |   |   |
|---|---|---|
| 11 Déplacements du domicile au lieu de travail et vice-versa (lorsque le lieu de travail est fixe : magasin, atelier, bureau) | 23 Transport de gravats et de déchets   | 41 Transport de personnel ou de clientèle |
| 21 Transport d'outillage ou d'échantillons pour votre travail   | 31 Livraisons ou ramassage pour compte propre                                       | 42 Autres déplacements professionnels     |
| 22 Transport de matériaux pour votre travail  | 32 Transport de marchandises pour compte d'autrui (pour tiers contre rémunération). | 51 Déménagements                          |
|   |   | 51 Déplacements non professionnels        |