



Freight Transport Association

Reform of Road Transport Legislation: EU Mobility Package

Briefing

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**Freight
Transport
Association**

FTA is one of the UK's largest trade associations and represents over 16,000 members relying on or providing transport integration both domestically and internationally, to or from the UK. Our members include hauliers, freight forwarders, rail, sea and air freight operators, through to customers – producers, manufacturers, wholesalers and retailers. They cover all modes of transport – road, rail, air and sea. FTA members operate over 200,000 commercial goods vehicles on the roads in the UK – more than half the UK fleet. FTA members also consign around 90 per cent of goods moved by rail and around 70 per cent of goods moved by air and sea.

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EU Mobility Package – overview

On 31 May 2017, the European Commission published its long-awaited 'Mobility Package'. This is composed of eight legislative measures on road transport and several accompanying policy documents, such as a strategy setting out a long-term plan to deliver clean, socially fair and competitive mobility in Europe.

While the proposed legislation would be unlikely to come into force before Brexit, many of the proposals contained in the Mobility Package will affect the practicalities of how goods will move into and out of Europe from the UK. It may also be that, in the process of negotiating an effective, frictionless trade deal, the UK Government agrees to implement some or all of the proposals in the Mobility Package as part of maintaining parity with EU standards. As such, this is an area which FTA will continue to monitor closely on behalf of its members.

Mobility Package – key elements

1. The Mobility Package contains the following legislative proposals:
 - proposed revision of the **Eurovignette directive for road tolling**, with plans to move towards distance-based tolling rather than time-based systems and to introduce incentives for CO₂ efficient vehicles (**page 5**)
 - recast of the directive on the **interoperability of electronic road toll systems**, designed to increase interoperability and put an end to the need for multiple boxes in the cab (**page 7**)
 - revision of the regulations on **access to the road haulage market**, with changes to the rules regulating cabotage (going from three operations in seven days to an unlimited number of operations in five days), and to the **occupation of road transport undertaking** (ie operator licensing), with proposals focused on the van sector (**page 8**)
 - revision of the directive on the use of **hired goods vehicles** (**page 11**)
 - revision of directive 2006/22/EC on the implementation of social legislation and proposals to streamline requirements on the **posting of workers**, (ie minimum wage rules) (**page 12**)
 - revision of regulation (EC) No 561/2006 on **driving and rest periods** and of regulation (EU) No 165/2014 on **tachographs** (**page 13**)
2. The package also contains various non-binding policy proposals of relevance to FTA members, including a consultation document for the social partners on a possible revision of the working time directive (2002/15/EC).

These proposals will now be transmitted to the European Parliament and the European Council, who will both adopt their respective positions on the various files and suggest amendments. FTA will remain active throughout the policy process in Brussels. To provide input and suggestions to policy makers and influence the final texts, FTA will prepare amendments based on feedback gathered from its members through Freight Councils.

Forthcoming EU initiatives planned for 2017 and 2018

The strategy entitled 'An agenda for a socially fair transition towards clean, competitive and connected mobility for all' was released as part of the Mobility Package. It contains a list of measures likely to be issued in the second half of 2017 and 2018, the following are the most relevant items for FTA members.

3. **CO₂ standards for vans and heavy duty vehicles** - the Commission has started work to revise the post-2020/2021 CO₂ standards for cars and vans. Options under review include specific targets

for low and/or zero emission vehicles. EU standards for heavy duty vehicles are also under consideration by the Commission. It is envisaged that these proposals will be published at the end of 2017 and in the first half of 2018 respectively.

4. **Guidance for cities on access to urban areas for heavy duty vehicles** - some cities are introducing, or considering, vehicle access restrictions to improve air quality. The Commission monitors these initiatives closely, to ensure that drivers have access to relevant information, and could potentially develop guidance for cities on access to urban areas for heavy duty vehicles.
5. **Revision of the directive on clean vehicles** - to better promote the use of public procurement to incentivise the creation of markets for innovative and low-emitting products, the Commission is planning to revise EU legislation on clean vehicles towards the end of 2017. As an example, these rules would apply to public procurement of vehicles by local authorities.
6. **Revision of the combined transport directive** - the Commission will revise the existing rules on combined transport in autumn 2017. Changes are likely to focus on reducing restrictions, such as authorisation procedures, and offering financial support through fiscal incentives.

FTA will make the most of its connections through its permanent office in Brussels to engage actively with the Commission ahead of the publication of these proposals and will also be actively involved in the process once they have been published. FTA members will be updated on progress with these initiatives as and when new information is available.



Eurovignette directive for road tolling

Directive 1999/62/EC provides the legal framework for charging HGVs for the use of certain roads. The directive aims to eliminate distortions of competition between transport undertakings by a step-wise harmonisation of vehicle taxes and the establishment of fair mechanisms for infrastructure charging. It sets minimum levels of vehicle taxes for HGVs and specifies the modalities of infrastructure charging, including the variation of charges according to the environmental performance of vehicles.

Charging of HGVs for infrastructure – key proposals

The polluter and user pays principle

1. The European Commission aims to progress the application of the 'polluter pays' and 'user pays' principles. It also intends to gradually decrease the disparities between different charging schemes to phase out the use of time-based user charges (vignettes) for international transport, first for HGVs and buses/coaches, then, at a later stage, for passenger cars and vans. It proposes removing the possibility of exempting HGVs below 12 tonnes from road charging.

Variation of charges for heavy duty vehicles (HDVs)

2. The term Heavy Duty Vehicle incorporates HGVs and PSVs at greater than 3.5t
3. It is proposed that the variation of charges according to the Euro emission class of the vehicle is phased out, and that variation of infrastructure charges according to the CO₂ emissions of HDVs is introduced as soon as possible after the necessary certified CO₂ emissions data become available.
4. The proposals seek to regulate congestion charging separately and to phase out the possibility of revenue-neutral variation of charges according to time of day, type of day, or season.

Variation of charges for light duty vehicles

5. A new proposal specifies the way that tolls and user charges are made according to the environmental performance of passenger cars, minibuses and vans. The proposed variation is to be based on emissions of both CO₂ and air pollutants.

Use of revenues

6. The proposals require revenue from congestion charging to be used to address congestion, eg by supporting alternative transport solutions or removing bottlenecks.

FTA view – the change in the emphasis on charging to make the polluter and user pay is difficult to argue against, especially as the proposal now relates to Heavy Duty Vehicles and the inclusion of cars and vans, not just HGVs as has been the focus in the past. However, the extent to which the polluter/user pays principle will be taken up by politicians is debatable as there has always been a fear of upsetting car owners.

The proposal to move to distance based charging by phasing out time-based charging (vignettes) is something that FTA has quietly supported for some time but this will present challenges for the HGV Road User Levy (HGV RUL). There is also a specific reference in the

proposed directive to phasing out the revenue-neutral variation of infrastructure charges applied to HGVs, which could pose a threat to balancing VED against the HGV RUL.

The aim seems to be to establish the principle that there should be a common approach to road charging to provide a benefit to the industry overall, against the increase in costs as a result of charging and tolling. There is the potential to reinvest the income to provide better infrastructure within certain constraints.

There is still no comment on increasing HGV emissions. This is surprising when we consider advances in engine technology, led by changes to HGV engines reducing particulates and the better performance of Euro 6 on NO_x.

The directive defines HGVs as goods vehicles with permissible mass exceeding 3.5 tonnes which would be included within the definition of HDV. It should be noted that this differs from other regulatory thresholds which exist at 7.5 tonnes, such as driver licensing.



The interoperability of electronic road toll systems

The European Commission has published proposals to further develop the interoperability of electronic road tolling systems across the EU. The proposals outline a framework for interoperability which the Commission hopes will be adopted by member states rather than mandating an EU-wide standard.

1. Electronic toll collection systems have been deployed at national, regional or local level in 20 member states and the number of systems continues to grow. The vast majority require road users to install special equipment, referred to as on-board units (OBUs), in vehicles. While a few systems offer cross-border interoperability, most do not. This results in costs and burdens for users, who must equip their vehicles with multiple OBUs to be able to drive unhindered in different countries.

Interoperability – key proposals

Interoperability of toll systems

2. A European Electronic Toll Service (EETS) should provide interoperability at technical, contractual and procedural level, covering:
 - a single contract between clients and the operators offering the service, complying with a contractual set of rules allowing all operators and/or issuers to provide the service, giving access to the whole network
 - a set of technical standards and requirements allowing the industry to provide the necessary equipment for the provision of the service
3. The EETS initiative is expected to reduce the regulatory burden for companies by a cumulated €254m until 2025 because of:
 - €370m reduction in regulatory burden for road users until 2025
 - €126m increase in regulatory burden for toll chargers
 - €10m reduction in regulatory burden for EETS providers

Exchange of information between member states

4. Cross-border exchange of information between member states on those who fail to pay a road fee should be able to happen independently from the technology which is used for carrying out electronic toll transactions.

FTA view – little progress has been made on the interoperability of electronic tolls and, with a few exceptions, where there is interoperability, it is mainly at national level. Only a few, limited cross-border agreements have been concluded.

While the reduced cost to road users is welcomed the increased cost to toll operators creates a situation where they would be unlikely to be willing to change the current situation. While FTA supports the draft directive, it is realistic to expect slow progress on the issue.

FTA believes there should be a requirement to develop shared databases for enforcement of cross-border penalties to provide a fair system of enforcement. This is an element lacking not only for the effective interoperability of tolling but also for driver and vehicle licensing enforcement in general.



Access to the occupation of road transport operator and access to the international road transport market

European regulation 1071/2009 on access to the occupation of road transport operator sets out the rules at European level for what is known better in the UK as Operator Licensing. The European rules apply only to operations for hire or reward, or standard licences in the UK. The regulation defines the four key elements of operator licensing: repute; professional competence; financial standing; and, establishment.

Regulation 1072/2009 on access to the market outlines the requirements of operators undertaking international haulage including cabotage and the documentation required to be carried by hauliers on a journey within the EU; it also lays down the requirements for data-sharing between member states.

Access to the occupation - key proposals

Application of the rules to vans

1. The proposals delete the first general exemption of the existing rules of operator licensing: “vehicles which do not exceed 3.5 tonnes.” This is replaced with a selective exemption, the outcome of which will mean that the requirements for financial standing and establishment will apply to all operators of vans undertaking hire or reward operations (not own account). No lower weight limit is included so this appears to include car derived vans.
2. Financial standing rates for vans are set at €1,800 for the first vehicle and €900 for each subsequent vehicle. At current exchange rates¹ that would mean around £1,550 and £580 respectively. This is not a requirement for these sums to be paid, rather the ability for an operator to be able to demonstrate that they have such funds available to prove that the business is solvent and will not be likely to cut corners on maintenance obligations due to lack of available funds.
3. The rules regarding establishment are to be amended (see below) but it will not include the requirement to specify vehicles to an operating centre, or to demonstrate that an operating centre has sufficient parking for all such vehicles as these are additional requirements of the GB system only.
4. Member states will also be required to report annually to the Commission on van activity in scope of the regulation.

FTA position – FTA has continuously objected to proposals to increase regulation of the van sector. FTA members who operate safe and effective van fleets are clear that there is currently a lack of enforcement of existing rules regarding roadworthiness and overloading. The introduction of new regulation in the absence of effective enforcement will divide the van industry into those who operate according to the law and those who operate according to what they know they can get away with.

Furthermore, increased enforcement of the new proposals will divert existing enforcement resource away from dangerous and overloaded vehicles to a ‘paper chase’ to ensure operators comply with an administrative procedure. The basic requirements of the rules are probably

¹For member states not in the Euro Zone exchange rates for financial standing are set for the calendar year according to the rate on the first Monday in the preceding October.

not a significant issue for many FTA members, but the administrative processes required to prove compliance could be, and will impose a greater burden on the Traffic Commissioners (and therefore an increased cost to industry).

Establishment

5. Rules currently require that operators conducting haulage are established within that member state to prevent 'letterbox companies', whereby hauliers without an established presence can visit from other member states and compete unfairly with a reduced cost base. The tests for establishment are that an operator has "*premises in which it keeps its core business documents, in particular its accounting documents, personnel management documents, [and] documents containing data relating to driving time and rest.*"
6. In addition to these requirements, the proposals will also require that the following data is collected on the Electronic Register of Road Undertakings (ERRU):
 - the registration numbers of vehicles at the disposal of the operator (already a requirement in UK, although this measure would not have been possible had FTA not secured the inclusion of the registration number as a voluntary field in the ERRU in 2011)
 - number of employees
 - assets, liabilities, equity and turnover in the last two years
 - risk rating

It is assumed that any further data would be collected through the operator licensing application process.

FTA view – members have indicated that the problem of 'letterbox companies' is not as apparent in the UK as it is in other European member states. FTA has impressed upon the Commission that a factor in this is that UK operators must specify vehicles to operator licences, and it appears to have recognised that point. FTA will discuss with members the implications of the requirement to state numbers of employees and further financial information.

Repute

7. The proposals clarify whose conduct should be considered under repute; it appears not to exceed that currently expected by Traffic Commissioners and the Transport Regulator (NI).
8. The proposals also extend the consideration of repute to include tax law for the operator and posting of workers and contract law for transport manager. The Senior Traffic Commissioner's Guidance and Directions document regarding repute already identifies "*Tax evasion of any kind including non-payment of or avoidance of VED, fuel tax and HMRC payments re employee tax and NI contributions within the last five years*" as an example of conduct which may be relevant when considering repute. Furthermore, conduct in any sphere of company or private life can be considered if a fine exceeding level 4, or a prison sentence of greater than three months has been handed down.

Co-operation between member states

9. A competent authority (ie regulator) from another member state may request that a member state provides information and, where necessary, carries out checks on operators established in that member state. The member state of which the request is made must conduct any investigation and respond to the request within 25 days.

FTA view – FTA members have often expressed concern that significant infringements detected by the Driver and Vehicle Standards Agency (DVSA) at the roadside committed by non-UK operators are not followed up effectively by the operator's own enforcement and regulatory authority. This proposal will hold other member state authorities to greater account in respect of their own operators.

However, the conclusions to the Triennial Review of the Traffic Commissioners in 2015 proposed that the Traffic Commissioners should themselves have a greater authority to direct DVSA in part of its enforcement investigations. This proposal was rejected by the Government. The Commission's proposals could mean that the competent authority in any other member state has greater powers in directing DVSA's investigative work than do the Traffic Commissioners.

Further measures

10. The removal of the allowance for member states to require **additional requisites** for access to the occupation, beyond those outlined in the regulation (repute, professional competence, financial standing and establishment); none such further requirements are applied in the UK.
11. In addition to application to vehicles below 3.5 tonnes, the financial standing rules are amended to change the **ways in which an operator can demonstrate financial standing**. The changes include a general statement of "*another binding document proving that the undertaking has at its disposal the amounts specified*".
12. Clarification that once the **time limit for meeting financial standing** had expired, an operator must demonstrate that it meets the requirements immediately. The previous drafting was at times being interpreted that the operator could demonstrate that they would meet the requirement at a point in the future. Traffic Commissioners have always interpreted the existing law in line with the clarification, indeed recently issuing a memorandum to emphasise that once the statutory 'grace' periods for both financial standing and professional competence had expired then Commissioners had to revoke the licence by law.
13. A **transport manager who has lost repute** may not be rehabilitated for at least a year.

Access to the market – key proposals

Cabotage

14. Cabotage is the movement of domestic loads within a member state by a non-domestic operator after that operator has delivered an international load in that country. Current rules state that, after the international load has been dropped in its entirety, an operator may make no more than three internal domestic deliveries within seven days. The principle of cabotage aims to strike a balance between unfair cross-border competition and effective use of vehicles on international journeys.
15. The proposals change the rules to allow unlimited domestic movements but reducing the period to five days.

FTA view – FTA supports the existing rules as a pragmatic balance between protecting domestic markets and effective utilisation of vehicles on international journeys. The proposed changes seem to be a significant liberalisation of the market – unlimited movements in a working week (five days). We will seek members' views on the impact of the proposed changes.

Shipper liability

16. Proposals specify that shippers and freight forwarders who *knowingly* commission transport services which require the operator to commit infringements will be subject to sanctions.

Carriage of empty containers

17. Under the proposals, carriage of empty containers or pallets will be own account (not hire and reward) unless a contract exists between a consigner and consignee.



Hired vehicles

The European Commission's Mobility Package proposes changes to the rules surrounding the use of hired commercial vehicles. The proposals are broadly market liberalising, allowing greater use of such vehicles within member states and across borders, and indeed prohibiting the restrictions which member states may employ in this area domestically.

Hired vehicles – key proposals

Sourcing of hired vehicles

1. The proposals require member states not to place restrictions on operators wishing to operate across an international border using a hired vehicle from a third member state.
2. **Example** – an operator in France would be able to make an international journey into the UK using a vehicle hired in Belgium.
3. The proposals require Member States not to place restrictions on operators established in that member state from hiring in vehicles from another member state (eg a GB operator hiring a vehicle from France for use in GB) for at least four months in a calendar year. Current GB operator licensing rules state that only vehicles registered in GB can be specified on a licence. This suggests that the law would have to change, but also it is unclear whether the Vehicle Operator Licensing (VOL) system is currently able to accommodate non-GB registered vehicles.
4. **Example** – an operator holding an operator licence in Kent would be able to hire a vehicle in France and operate it in GB for up to at least four months.
5. The proposals require that member states ensure that vehicles hired by an operator are subject to the same standards and conditions as those they own. GB and NI operator licensing already requires this.

FTA view – FTA will test with members the potential impact of these proposals. There may be some differences between member states in terms of vehicle markings and lighting requirements, but significant safety requirements (eg brakes, suspension, steering) will be common across the EU.



Posting of workers directive – creation of rules specifically for international drivers

The European Commission proposes to amend the framework legislation that governs the rules for workers when sent to work in another country, the posting of workers directive, to create a category specifically for international professional drivers. This follows sustained and high-level lobbying by FTA on behalf of its International membership, in respect of the varying national implementation plans that have appeared over the last few years to enforce national minimum wages for drivers present on the territory of several countries.

Posting of workers – key proposals

Scope of new rules

1. The Commission has proposed that drivers who are present in another country for three days or fewer will not be covered by the minimum wage rules when performing international transport.
2. Domestic operations and cabotage will be covered by national minimum wage rules from the very start.

Obligations on operators

3. The Commission has proposed that member states may only be permitted to impose the following requirements:
 - the operator must make an electronic declaration, in host language or in English, that includes information about the journey and contact details of the operator and/or transport manager. This should be valid for operations covering a six-month period
 - the driver must keep and make available, in paper or electronic form, a copy of the posting document and evidence of the transport operations being undertaken
 - the driver must keep and make available relevant tachograph records
 - the driver must keep and make available, in paper or electronic form, a copy of the employment contract
 - the driver must keep and make available, in paper or electronic form, copies of last two months' pay slips. The driver will have the right to contact Head Office during roadside check to ask for these documents to be sent electronically
 - the operator shall make copies of documents covered in bullet points 2, 3 and 5 available in a reasonable time to the host member state in case of control

There will be no requirement to have a nominated 'representative' in the host member state.

FTA view – FTA members operating internationally have reported significant difficulties in dealing with the administrative requirements of some member state's minimum wage requirements. Following these reports, FTA has made representations to the Commission questioning the appropriateness of some of the measures under existing rules. The proposals go some way to address many of the issues raised while others, such as whether the member state can charge the operator a fee for entering into the administrative process remain outstanding.



EU drivers' hours rules and tachographs

The European Commission's Mobility Package includes quite wide-ranging proposed changes to EU drivers' hours rules (561/2006) and requirements to mark a vehicle's position under tachograph rules (165/2014). FTA has resisted any change to the rules on the grounds that this will create confusion and drivers will be subject to penalties for getting the rules wrong rather than being any present threat to road safety.

1. These changes illustrate that, as Brexit progresses, industry and the UK Government will need to decide whether the UK should move to a 'three tier' drivers' hours system, whereby those on international journeys will have to meet the continuing drivers' hours rules of the EU, those domestic operations which currently fall in scope of movements which we currently describe as 'EU rules' operate under rules which diverge from those for international journeys, and operations under the rules currently known as 'domestic' remain unchanged.

Drivers' hours rules – key proposals

Weekly rest

2. The requirements surrounding deviation from regular weekly rest will now be measured in a four-week period rather than the existing two-week period. A driver would be able to take two reduced weekly rests within a four-week period – not allowing any more reduced rests overall but allowing them to be 'bunched' more closely. The compensation will still have to be taken before the end of the third week after the week in question.
3. However, compensation for a reduced weekly rest will no longer be able to be taken in conjunction with a daily rest period, and must now be taken along with a full weekly rest of 45 hours.
4. Regular weekly rest and any rest period of greater than 45 hours will not be allowed to be taken in the vehicle. The rest must be taken "*in a suitable accommodation, with adequate sleeping and sanitary facilities,*" and must be either provided or paid for by the employer, or at home or at another private location chosen by the driver. This measure aims to harmonise existing divergent interpretations of an ambiguity in existing legislation. The UK currently interprets that it is not permissible to spend a regular weekly rest in a vehicle. The new proposals will also require that at least one weekly rest or compensation rest in four weeks must be taken 'at home'.

FTA view – this measure is intended to address problems of visiting non-domestic drivers competing in the haulage market, living from their sleeping cabs for long periods of time. FTA represents a number of operators in the entertainment sector whose vehicles transport equipment (eg stage equipment and musical instruments) with touring bands and performance companies. Representatives of this sector have indicated that this measure will create significant practical difficulties, while they have invested significantly in highly specified vehicles which drivers state they would prefer to use rather than finding suitable hotel accommodation (for example, in a city centre with secure parking for articulated vehicles).

At FTA's Road Freight Council meeting in November 2016, members suggested that where a driver had the genuine choice, they should be entitled to take all rest periods in sleeper cabs.

Further measures

5. Clarification that '**non-commercial carriage**' means any carriage by road, other than carriage for hire or reward or for own account, for which no remuneration is received and which does not generate any income.
6. Clarification and harmonisation of the **recording of other work**.
7. Clarification following case law that **private individuals** carrying their own belongings in a vehicle which would otherwise be in scope of the regulations are not required to record driving and rest times nor use a tachograph or tachograph card.
8. Clarification that a driver in a **multi-manned operation** may take 45 minutes' break from driving while the vehicle is being driven by another driver. This reflects existing guidance from the Commission.
9. The **ferry rest** allowance that a daily rest can be interrupted to move on and off a ferry or train can now be applied to reduced weekly rest.
10. The rules in **unforeseen circumstances** (eg serious traffic disruption) will allow a driver to be late starting the next daily or weekly rest period, but may not extend daily or weekly driving times beyond prescribed levels, nor reduce the daily or weekly rest period.
11. Temporary **exemptions from the rules in cases of emergency** by member states must be justified to the Commission. It is understood that the UK is one of a very few member states who regularly employ this article (eg severe snowfall or the failure of the Forth Road Bridge).
12. **National penalties** imposed must be proportionate to the seriousness of the infringement; changes to the national penalty system must be notified to the Commission.

Tachograph – key proposals

13. The next generation of digital tachograph (smart tachograph) will become mandatory during 2019. The legislation enacting this change is already in force in the UK so would be carried over by the Brexit process as far as it is currently understood. The smart tachograph will include a GPS source. Existing regulations do not require the continuous tracking of vehicles, but that a GPS location 'stamp' is taken (automatically by the unit) at start and finish of duty each day and at three hour intervals.
14. The proposals slightly alter the requirement for the automatic stamp of the smart tachograph, but also aim to meet the location standards of the smart tachographs through manual inputs in existing units.
15. The proposals require that the next generation smart tachographs will also have to take a location stamp every time the vehicle crosses a border. The position of the amendment in the existing text suggests that this would also be an automatic process.
16. For existing specification units which do not have automatic geo-location, the driver is required, in addition to entering the appropriate country symbol at the start and finish of a working period, to indicate where and when the driver crossed an international border.

FTA view – there is a concern that the requirement to enter details of where and when a border was crossed manually could add a significant burden. It is unclear from the text how soon a driver would be required to enter this information; the expectation that drivers might have to pull over soon after crossing, rather than progressing to a planned stopping point, could lead to congestion near border crossing areas.

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