

Uniunea Națională

a Transportatorilor Rutieri din România

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### International Transport Forum

For the kind attention of Mr. José VIEGAS – Secretary General

**Subject: Turkish authorities' abusive practices against Romanian hauliers to be addressed in the upcoming ITF meeting on 25-26.09.2014, with a view to undertake urgent measures to solve this problem**

Dear Mr. VIEGAS,

May we revert to our letter No. 3234 of 20.11.2013 concerning the abusive practices of Turkish authorities against Romanian road transport operators, disregarding all international road transport rules and practices.

As the abusive practices of the Turkish authorities do also affect transport operators from other countries in the region like Bulgaria, Republic of Moldova, Greece, Serbia, etc. - therefore exceeding the status of a bilateral issue, we would like to kindly ask you to address this serious problem in the scope of the upcoming meeting of the ITF Group on Road Transport, to be held this week in Paris on 25 and 26 September, with a view to undertake urgent measures to solve it.

Although our association, the National Union of Road Hauliers from Romania – UNTRR signaled the seriousness of this problem to all the relevant national and international bodies, including ITF – no effective measures were taken so far to stop the abusive practices of the Turkish authorities, which continue to affect trade and transport between Romania - as an EU member state and Turkey - as an EU candidate.

Allow me to recall hereby the abusive practices implemented by Turkish authorities at entrance on the territory of the Republic of Turkey, despite bilateral road transport agreement with Romania - stipulating that the direct traffic between the two countries is liberalized and despite international road transport rules and practices:

- Turkish authorities are abusively asking for third country permits or ECMT permits for transport operations performed between Romania and Turkey, despite the fact that the goods are produced in Romania and transported to Turkey, in accordance with CMR and TIR carnet.** The Turkish authorities consider the type of the transport operation based only on the invoice of the goods! Therefore in case the invoice is issued by a company from a third country, the Turkish authorities consider the origin of the transport as being given by the origin country of that invoice. For example, in the case of the goods produced in Romania by Renault Romania: the respective goods are transported by CMR and TIR from Romania to Renault Turkey, but the invoice is



issued by Renault France to Renault Turkey. In this situation, the Turkish authorities demand third country permits or ECMT permit as if the transport is made from France to Turkey. Similar requirements are made for any EU or non-EU origin country of invoice. Similar requirements are made for goods produced in Turkey and delivered in Romania. In the era of globalization this abusive and unilateral practice is raising barriers to trade and transport.

2. **Turkish authorities are abusively and unilaterally introducing time limits for the use of the annual multilateral ECMT permits as described in the attached table. Regardless of the origin of the goods and of the loading place, Turkish authorities are restricting the use of ECMT permits to a minimum number of days, imposed unilaterally and based also on the origin country of the invoice!** For the above mentioned case, although the transport is performed from Romania to Turkey, it is forbidden for 9 days to enter Turkey with an ECMT permit - time which Turkish authorities consider that it is necessary to operate the transport from France, based only on the origin country of the invoice and without taking into account the real origin of the goods and their loading place which is Romania and not France. Also, these imposed time limits do not take into account the situation of the just in time express deliveries operated with more drivers.
3. **Turkish authorities are abusively and unilaterally asking for third country permits for vehicles below 3,5 tones!**

Starting with 1<sup>st</sup> of September 2013, Turkish authorities imposed and enforced 3000 euro fines on the spot, for all the situations described in the points above.

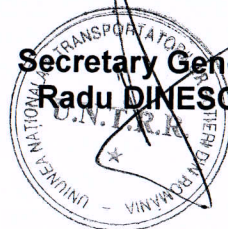
Expressing our concerns about all these abusive practices of Turkish authorities, we kindly ask you to intervene and to undertake immediately all the necessary measures in order to avoid this kind of approaches to become a common practice in Turkey and eventually to be extended to other areas and industries, affecting the business relations between countries and also the healthy functioning of European market.

Considering the opportunity to address this serious problem during the upcoming meeting of ITF Group of Transport, we kindly ask you to include it on the agenda of this meeting, trusting that this will enable ITF to analyze the issue and undertake urgent and effective measures to stop the abuses of Turkish authorities. In case of no positive outcome on short term, we consider the necessity to introduce restrictions for ECMT use on Romanian territory.

Looking forward for your kind reply, I remain at your disposal for any further information.

Yours sincerely,

Secretary General  
Radu DINESCU



Time restrictions table applied to the transport operations with ECMT permits

No	Country	1 trip/day according to the country	1 trip/day for return trip according to the country	Total number of days for round trip	Total number of hours for round trip
1	Germany	4	4	8	192
2	Albania	1.5	1.5	3	72
3	Austria	2.4	2.4	4	96
4	Azerbaijan	2	2	4	96
5	Belarus	3.7	3.7	7	168
6	Belgium	4.4	4.4	8	192
7	Bosnia-Herzegovina	1.6	1.6	3	72
8	Bulgaria	0.5	0.5	1	24
9	Czech Republic	3	3	6	144
10	Denmark	5	5	10	240
11	Armenia	0	0	0	0
12	Estonia	5	5	10	240
13	Finland	5.1	5.1	10	240
14	France	4.6	4.6	9	216
15	Georgia	1	1	2	48
16	Croatia	2	2	4	96
17	Netherlands	4.5	4.5	9	216
18	England	5	5	10	240
19	Ireland	6.1	6.1	12	288
20	Spain	6	6	12	288
21	Sweden	5.5	5.5	11	264
22	Switzerland	3.6	3.6	7	168
23	Italy	3.6	3.6	7	168
24	Iceland	7	7	14	336
25	Latvia	4.4	4.4	8	192
26	Liechtenstein	3	3	6	144
27	Lithuania	4	4	8	192
28	Luxemburg	4.1	4.1	8	192
29	Hungary	2	2	4	96
30	Macedonia	1	1	2	48
31	Malta	5.47	5.47	10	240
32	Moldova	1.5	1.5	3	72
33	Norway	5.4	5.4	10	240
34	Poland	3	3	6	144
35	Portugal	7.2	7.2	14	336
36	Romania	1	1	2	48
37	Russia	4	4	8	192
38	Serbia-Montenegro	1.5	1.5	3	72
39	Slovakia	2.3	2.3	4	96
40	Slovenia	2.2	2.2	4	96
41	Ukraine	2.4	2.4	4	96
42	Grecce	0.5	0.5	1	24