

Uniunea Națională

a Transportatorilor Rutieri din România

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MINISTRY OF INFRASTRUCTURE – UKRAINE

For the kind attention of Mr. Volodymyr KOZAK - Minister

Dear Mr. Volodymyr KOZAK,



On behalf of The National Union of Road Hauliers from Romania (UNTRR) as employers' and professional organization which promotes and protects nationally and internationally the interests of Romanian operators performing road transport of passengers and goods, taking into account the major problems faced by Romanian transport operators in front of unilateral and abusive measures introduced by Turkish authorities, disregarding all international road transport rules and practices, I urge you to take urgent measures to stop these practices which affect also transport operators from other countries in the region like Bulgaria, Republic of Moldova, Greece, Serbia, etc. - therefore exceeding the status of bilateral issue.



Turkish authorities implemented following **abusive practices at entrance on the territory of the Republic of Turkey, despite bilateral road transport agreement between two countries that stipulates the direct traffic is liberalized and despite international road transport rules and practices:**



1. Turkish authorities are abusive asking for third country permits or ECMT licence for transport operations realized between Romania and Turkey, despite the fact the transported goods are produced in Romania and delivered to Turkey, in accordance with CMR and TIR carnet - the goods are moved from Romania to Turkey. The Turkish authorities consider the type of transport operation based on the invoice of the goods! Therefore where the invoice is issued by a company from a third country, the Turkish authorities consider the origin of transport based on the origin of the invoice. For example goods produced in Romania by Renault Romania, transported by CMR and TIR to Renault Turkey, if the invoice is issued by Renault France to Renault Turkey - the Turkish authorities demand third country permits or ECMT permit as transport is made from France to Turkey. Similar requirements are made for any EU origin 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 in front of trade and transport.



2. Turkish authorities are abusive and unilaterally introducing time limits for the use of annual multilateral ECMT permits as described in the attached table. Indifferent to the origin of the goods, to the loading place, Turkish authorities are restricting the use of ECMT permits a minimum number of days, imposed unilaterally and based also on the origin of the invoice! For the above mentioned case, ECMT permit is forbidden 9 days to enter Turkey - the time considered by Turkish



authorities necessary to operate the transport from France, based only on the origin of invoice and not taking into account the origin of goods, the CMR, TIR, transit. Also the time limits first are based on invoice, second they do not take into account for real transport situations from these countries to Turkey the just in time express deliveries operated with more drivers.

3. Turkish authorities do not take into consideration multimodal transport operations, therefore they ask for third country permits also for goods arrived in Romania by rail, sea, air and transported by road to Turkey.
4. Turkish authorities are abusive and unilaterally asking for third country permits for vehicles below 3,5 t Gross Vehicle Weight!
5. Turkish authorities restrict the use of ECMT permits for transport operations transiting Turkey, considering the country of origin of the transport operation being the country in which the invoice was issued and not according to the actual place of loading stated in the CMR and TIR Carnet, therefore even if the country of loading is a ECMT member, and if the country from which the invoice was issued is not a ECMT member, Turkish authorities do not allow the use of ECMT permit for these transport operations and ask exclusively for transit permits.

Basically, in an abusive way, Turkish authorities disregard the place of goods loading having Turkey as destination or transiting Turkey, as mentioned in the CMR and TIR Carnet, considering the place of departure of the goods as being the country where the invoice of the goods is issued.

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

The above mentioned abusive practices of Turkish authorities are affecting the transport and trade between Romania - EU member country and Turkey - EU aspirant country.

Expressing our concerns about these serious problems faced by the road hauliers in front of 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, affecting the business relation between countries and also the healthy functioning of European transport market and eventually to be extended to other areas and industries.

In case of no positive outcome on short term, we will consider the necessity of introducing restrictions for the usage of ECMT permits on Romanian territory.

Counting on your support for the benefit of the road transport industry, we take this opportunity to thank you in advance for your kind support.

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	Greece	0.5	0.5	1	24