



Assessment of the impact of a provision in the context of the revision of Regulation (EC) No 1071/2009 and Regulation (EC) No 1072/2009

Stakeholder Consultation Summary

Study contract no. MOVE/C1/SER/2050-557/SI2.830443

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1 INTRODUCTION

This is the Stakeholder Consultation Summary for the support study "Assessment of the impact of a provision in the context of the revision of Regulation (EC) No 1071/2009 and Regulation (EC) No 1072/2009" (hereafter, the 'study') for the Directorate-General for Mobility and Transport (DG MOVE), (contract reference MOVE/C1/SER/2050-557/SI2/830443).

This report provides a summary of the strategy for and outcomes of the stakeholder consultation activities that were carried out as part of the support study to assess the potential impacts of the obligation of regular return of the vehicle to the Member State of establishment (as established in the revised Regulation (EC) No 1071/2009 on access to the occupation of road transport operator). It provides an analysis of the range of stakeholder groups that have engaged in those activities and a summary of the main issues raised by stakeholders.

2 CONSULTATION STRATEGY

2.1 Methodology

The stakeholder consultation for this support study was based on the combination of a targeted online survey and follow-up interviews and data requests, used to collect relevant evidence to supplement and/or cross-check the evidence gathered through the desk research. These methods allowed us to collect input from a broad range of stakeholders representing different viewpoints and interests from the following:

- Companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider);
- National associations of road haulage / transport operators;
- Trade unions representing drivers of vehicles engaged in the provision of road freight transport services;
- Drivers of vehicles engaged in road freight transport; and
- National competent and enforcement authorities involved in monitoring and enforcement of existing regulation compliance.

This exercise aimed to gather the views of stakeholders on the following topics:

- Current business practices and market situation
 - Types of international transport operations and main countries where operations take place
 - Truck cycles, including information on the vehicles used in longer v shorter cycles
 - Frequency of returns of vehicles per year
 - Capacity to source cargo currently and existing constraints
 - Frequency of returns of drivers and the mode by which they travel
- Potential impacts on road freight operations
 - Impacts on operations, including how organisations will adapt their operations, the ability to source additional cargo, expected barriers to this and proportion of empty runs as a result.
 - Impacts on costs as a result of the measure being implemented (increase or decrease)
 - Economic and social impacts, for example on competition of the market and on driver working conditions.

- Impact of recent events on the sector
 - Whether longer term effects of COVID-19 and Brexit on the market are expected beyond 2022.

The following sections provide details on the different engagement tools used in this stakeholder consultation.

2.2 Surveys

The targeted consultation ran from 24 August 2020 to 25 September 2020 and consisted of three different surveys combining open and closed questions to collect inputs from each of the identified stakeholder groups. Depending on the type of stakeholder and their relevant experience, different stakeholder groups were asked a slightly different sub-set of the questions. The final version of the surveys can be viewed in Annex 1. A summary of the target audience and topics covered in each survey is provided in Table 2-1.

Table 2-1: Summary of survey tools used

Survey	Target audience	Topics covered
Stakeholder survey*	Companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) Trade unions representing drivers of vehicles engaged in the provision of road freight transport services	Current business practices and market situation, covering typical international transport operations and truck cycles, types of vehicles, frequency of return for truck and for driver, capacity to source cargo; Potential impacts on the road freight market including on operations, associated costs**, economic and social impacts; and Impacts of recent events on the sector, specifically the COVID-19 pandemic and Brexit.
National associations survey	National associations of road haulage / transport operators	Same as above.
National authorities survey	National competent and enforcement authorities involved in monitoring and enforcement of existing regulation compliance.	Current monitoring and enforcement practices; Authority responses to the new measure, covering impacts on monitoring and enforcement practices Potential market responses to the new measure including general impacts, impacts on transport activity and congestion, economic and social impacts, and environmental impacts; Additional data collection of any available information on road haulage operations; and Impact of recent events on the sector specifically the COVID-19 pandemic and Brexit.

* Although not specifically targeted, there was also the option for drivers to complete the survey.

** Questions on costs were shown to companies engaged in the provision of road freight transport services only.

2.2.1 Participation of stakeholders

The two identical surveys to national associations and other stakeholders more generally (as indicated in Table 2-1) were sent to a total of 224 stakeholders including 66 road haulage associations/company contacts, 49 freight forwarder / logistics contacts and 109 trade union/ worker union contacts. The road haulage, freight forwarder and logistics associations were all requested to distribute the online survey link to their members to complete. Within each of these target groups, stakeholders from all EU-27 Member States were contacted.

A total of 507 complete responses to the survey were received from across the stakeholder groups, with an overview provided in Table 2-2 below. Responses were received from all Member States with the exception of IE, EL, HR and CY. It is noted that the total number of responses varies from question to question as not all respondents answered all questions. Responses were also received from NO and UA.

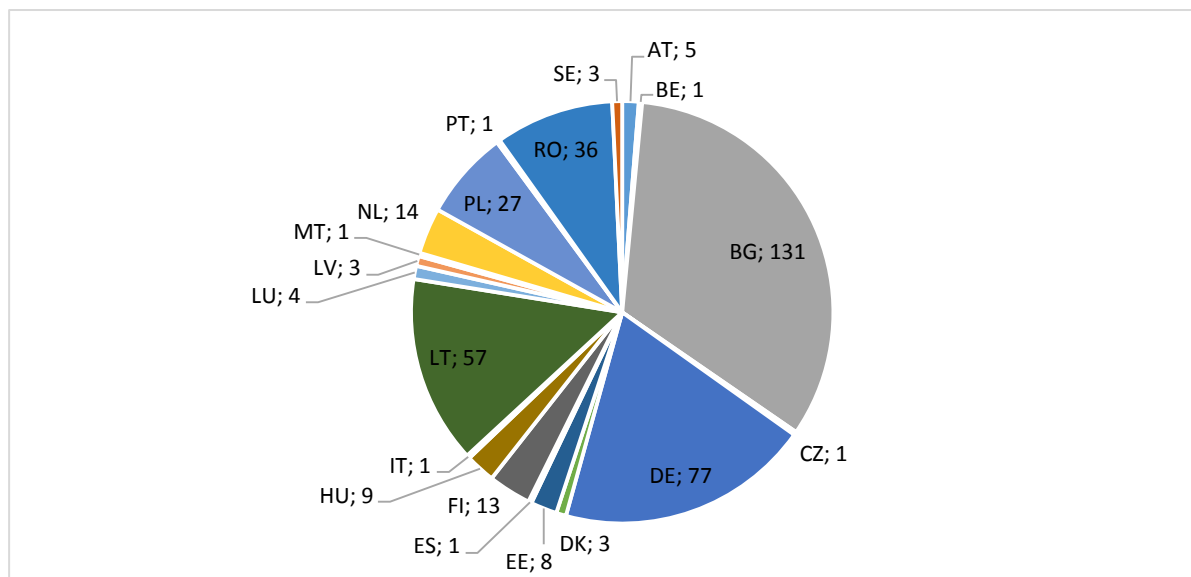
Table 2-2: Summary of responses by Member State

Member State	National associations	Road haulage operators/ freight forwarders	Trade unions	Drivers
Austria (AT)	1	5	1	1
Belgium (BE)	1	2	4	0
Bulgaria (BG)	3	147	1	10
Cyprus (CY)	0	0	0	0
Czech Republic (CZ)	1	1	0	0
Germany (DE)	1	78	0	8
Denmark (DK)	1	4	1	0
Estonia (EE)	1	10	1	2
Greece (EL)	0	0	0	0
Spain (ES)	0	1	1	0
Finland (FI)	1	15	0	0
France (FR)	1	0	3	0
Croatia (HR)	0	0	0	0
Hungary (HU)	1	10	0	0
Ireland (IE)	0	0	0	0
Italy (IT)	1	1	3	0
Lithuania (LT)	2	59	0	1
Luxembourg (LU)	0	5	0	0
Latvia (LV)	0	3	1	0
Malta (MT)	0	1	0	0
The Netherlands (NL)	0	14	1	0

Member State	National associations	Road haulage operators/ freight forwarders	Trade unions	Drivers
Poland (PL)	2	28	1	3
Portugal (PT)	0	1	0	0
Romania (RO)	0	39	2	5
Sweden (SE)	1	3	1	0
Slovenia (SI)	1	0	0	0
Slovakia (SK)	0	7	0	0
TOTAL	19 responses from 15 Member States	434 responses from 21 Members States	21 responses from 13 Member States	31 responses from 7 Member States
Non-EU Member States	Norway (1), Ukraine (1)	N/A	N/A	Norway (1)

Of the 434 responses received from road haulage operators, freight forwarders and logistics companies, 405 indicated they carry out hire and reward operations. Figure 2-1 provides further detail regarding the split of these responses by Member State. Two stakeholders did not specify their Member State and are therefore not included. Overall, more responses were received from EU-13 countries compared to EU-14 countries.

Figure 2-1: Split of responses by Member State from those who carry out hire and reward operations



2.2.1.1 Translations

Stakeholders were given the option of completing the survey in any of the official EU languages with the exception on Maltese and Irish. The translations were created using the EU survey machine translation tool. Where possible these were reviewed by native speakers to identify and address errors in the machine translations. However, a small number of issues were identified while the survey was open.

2.2.2 Survey of national authorities

The survey of national authorities was sent to 94 authority contacts and 39 transport attaché contacts from all EU-27 Member States. A total of 16 respondents completed the survey from 16 Member States. Responses were received from BG, CY, DE, DK, EE, ES, FR, HU, IE, IT, LV, MT, PL, RO, SE, SI.

The UK authority also responded to survey but was excluded and NL responded that they consider it too early in the implementation process to answer questions regarding the impact of the obligation to regularly return the vehicle to the Member State of establishment and therefore could not answer the survey. Responses were not received from AT, BE, CZ, EL, FI, HR, LT, LU, PT or SK despite reminders being sent and secondary contacts, include transport attachés being contacted.

As with the stakeholder survey it is noted that the total number of responses varies from question to question as not all respondents answered all questions.

2.3 Targeted interviews

2.3.1 Exploratory interviews

As indicated in the inception report, four exploratory interviews were carried out with the associations identified below in order to:

- Get a better understanding of the relevant issues to ensure these issues are properly addressed in the data collection tools (surveys and interviews);
- Discuss the data collection approach and identify the best possible approach in reaching their members. Securing the support from the associations to the study and their willingness to promote the survey was particularly important in securing high levels of participation with the interview and survey exercises.

The key outputs from the exploratory interviews are summarised in Table 2-3 below.

Table 2-3: Summary from the exploratory interviews

Stakeholder interviewed	Date of the interview	Key outcomes from the interview
The International Road Transport Union (IRU) representing hauliers at EU level	14/07/2020	Understanding of typical business practices and the market context; Agreement to share the survey with their members.
The European Association for Forwarding, Transport, Logistics and Customs Services (CLECAT), representing multinational, medium and small freight forwarders and Customs agents	14/07/2020	Greater understanding of the potential impacts on freight forwarders; Suggestion to expand the road haulage operators' survey to include freight forwarders and logistics providers on the basis that they too own fleets of trucks; Agreement to share the survey with their members.
The European Transport Workers' Federation (ETF), representing drivers	17/07/2020	Increased awareness of business practices and the market context from the perspective of the drivers; Request to consider greater engagement of

Stakeholder interviewed	Date of the interview	Key outcomes from the interview
The Confederation of Organisations in Road Transport Enforcement (CORTE), representing national transport authorities in the field of road transport, road security and road safety	23/07/2020	<p>ETF members –discussed with DG MOVE at the inception report meeting.</p> <p>Understanding current enforcement practices and challenges regarding monitoring and enforcement by national authorities;</p> <p>Observation that multiple departments within a national authority as well as multiple authorities are involved in different elements of enforcement and therefore all will need to be engaged in the consultation to get a full understanding of the impacts of the measure.</p> <p>Agreement to share the survey with their members.</p>

2.3.2 Interview programme

To supplement the information collected via the surveys, a small number of targeted interviews were carried out with a range of stakeholders. Within the inception report, it had been proposed that the target number of interviews should be 26 (in addition to the four exploratory interviews).

2.3.2.1 Participation in interviews

In total, 35 stakeholders were invited to interview (including 10 national associations, 14 road haulage operators, four trade unions, and seven national authorities). From this, 13 interviews were carried out and a further two written responses were received. A summary of the interviewees is provided in Table 2-4. The interview checklist used is provided in Annex 1.

Table 2-4 Summary of interview targets

Stakeholder group	Number of interviews conducted compared to target	Organisation name	Member State
National associations of road haulage / transport operators	7/8	Union of International Hauliers	BG
		Bundesverband Güterkraftverkehr Logistik und Entsorgung (BGL) e.V.	DE
		ERAA	EE
		ANITA	IT (written)
		TLN	NL
		UNTRR - The National Union of Road Hauliers from Romania	RO

Stakeholder group	Number of interviews conducted compared to target	Organisation name	Member State
		NLA & DTL	Nordic & DK
Companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider)	4/8	Anders Nielsen & co/ Ancotrans	DK
		Raseborg Express Ab	FI
		UAB Lekpas	LT
		Centrans Sp. Z.o.o	PL
Trade unions representing drivers of vehicles engaged in the provision of road freight transport services	1/4	Sindicatul Lucratorilor din Transporturi	RO
National competent and enforcement authorities involved in monitoring and enforcement of existing regulation compliance.	3/6	Ministry of Economic Affairs and Communications of the Republic of Estonia	EE (written)
		Transport Malta	MT
		Ministry of Transport; Road Transport Administration; Ministry of Interior; State Police	LV
TOTAL	15/26		

2.4 Data Requests

Complementary to the survey and the interviews, the study team carried out two main data requests for the purpose of filling gaps outstanding from the surveys and interviews:

1. Regarding truck cycles, sent to national associations and national authorities via email:
 - a. Approximate estimate of numbers of vehicles used predominantly or only for international operations; and
 - b. The share of these vehicles returning six or more times per year to the Member State of Establishment.

Table 2-5 sets out which stakeholders were contacted and responded to the two questions outlined above. The findings from the data request fed into the modelling described in the main report.

Table 2-5 Summary of responses from the truck cycle data request

MS sent request	Whether Q1/Q2	National associations		National authorities	
		contacted	responded	contacted	responded
AT	Q1 only	1*	0	2	2

BE	Q1 and Q2	1	0	1	0
BG	Q1 and Q2	2	2	1	1
CY	Q1 and Q2	0	0	1	0
CZ	Q1 only	1	1	1	1
DE	Q1 only	1	1	1	1
DK	Q1 only	1	1	1	0
EE	Q1 only	1	1	1	1
EL	Q1 and Q2	1	0	1	1
ES	Q1 and Q2	3	0	1	0
FI	Q1 only	1	0	2	0
FR	Q1 only	1	1	1	0
HR	Q1 and Q2	1	0	1	1
HU	Q1 only	1	1	2	0
IE	Q1 and Q2	2	1	2	1
IT	Q1 only	1	1	1	1
LT	Q1 and Q2	2	2	3	1
LU	Q1 and Q2	1	1	1	1
LV	Q1 and Q2	1*	0	3	2
MT	Q1 and Q2	0	0	1	1
NL	Q1 and Q2	1	1	1	1
PL	Q1 and Q2	2	1	1	0
PT	Q1 and Q2	2	1	1*	0
RO	Q1 and Q2	1	1	1	0
SE	Q1 only	1*	0	1	1
SI	Q1 only	1	1	1	1
SK	Q1 and Q2	2	0	1	0
Associations			Authorities		
Q1	Total sent	33	Q1	Total sent	35
	Total replied	18		Total replied	18
Q2	Total sent	22	Q2	Total sent	21
	Total replied	10		Total replied	10

* Given email addresses weren't functional

In total 33 data requests were sent to associations across 25 EU Member States and 35 requests to authorities from all EU Member States. All of these requests contained a question inquiring about how many vehicles approximately were used predominantly for international haulage and 18 from both the association and authority stakeholders responded across 16 EU Member States.

22 of the requests to associations and 21 of the requests to authorities also asked a second question about the share of these vehicles returning 6 or more times per year, for which 10 from both the association and authority stakeholders responded from 16 EU Member States. (Different Member States to the above question).

2. With respect to current overhead costs and future costs associated with relocation, sent to road haulage operators as a short online survey to complete:

- a. Estimation of the share of overhead costs (including the costs of operational centres and other facilities) in relation to current total annual costs for road haulage operators; and

- b. Expected impact on overhead costs for haulage operators associated with relocation of the main operational centre to a more central location in the EU as a response to the measure (including the costs of operational centres and other facilities).

The data request enquired about the current overhead costs and the expected effect of relocation on overhead costs of firms. We asked stakeholders to describe the nature of the expected costs to better judge their responses. We received 38 responses to the data request with a good representation of hauliers from Member States which are more likely to consider relocation as a result of this measure (e.g. BG, RO, LT) as per Table 2-6. This data was used to assess the nature and amount of potential ongoing and one-off relocation costs.

Table 2-6 Summary of responses from the relocation costs data request

Member States sent request	How many organisations sent	How many organisations responded
AT	5	0
BE	1	0
BG	131	17
CY	0	0
CZ	1	0
DE	77	2
DK	3	1
EE	8	1
EL	0	0
ES	1	0
FI	13	1
FR	0	0
HR	0	0
HU	9	0
IE	0	0
IT	1	0
LT	57	8
LU	4	0
LV	3	0
MT	1	0
NL	14	0
PL	27	1
PT	1	0
RO	36	6

Member States sent request	How many organisations sent	How many organisations responded
SE	3	0
SI	0	0
SK	7	1
Total	403	38

In addition to these formal data requests, the study team supported by Professor Alan McKinnon reached out to two load matching platforms, seeking additional information on market dynamics in order to better judge our estimates on empty running. One of the two contacts agreed to a brief discussion and some information was shared with the study team.

Micro-data from Eurostat on road freight transport measurement statistics was also sought but could not be provided due to confidentiality reasons. Even with this, the relevant team within Eurostat provided support to the team by assessing the validity of the assumptions put together by the team on the basis of stakeholder input and desk research.

3 REPRESENTATIVENESS OF THE STAKEHOLDERS COVERED

In this section, the representativeness of the survey sample is considered. This is an important factor with respect to interpreting the responses and trying to extract conclusions on the validity of the obtained information on the potential market responses to the new obligation on the return of the truck across the EU. Thus, besides considering the overall share of respondents compared to the total population of road haulage companies, the extent to which the sample reflects the distribution of companies across Member States and within three geographical Member State clusters was also examined. This has been identified as an important determinant of the responses typically received from stakeholders. Thus, such a comparison enables us to assess the robustness of the conclusions of the study.

Haulier survey responses

In total, 434 responses were received from companies (either comprising hauliers or freight forwarders and logistics providers). Of these, 405 were identified as organisations that carry out hire and reward operations, coming from 21 different Member States. From Eurostat data¹, presented in Table 3-1, we can see the population of road freight enterprises (latest full dataset from 2017) and level of international freight transport and compare the geographical distribution of the survey responses compared to the spread of enterprises and transport kilometres to assess whether the sample was representative of the population of hauliers / road haulage market within EU-27. Notable difference between the sample and the proportion of companies and international transport kilometres by Member State are shaded in Table 3-1. As can be seen, there is a notable overrepresentation in the same of hauliers from BG, DE and LT and an underrepresentation of hauliers from ES and PL.

However, when looking at the geographical Member States clusters used in this study (split into Western, Southern and Eastern European Member States), Table 3-2 indicates that when comparing against numbers of enterprises there is an overrepresentation of the Eastern European population and an underrepresentation of Southern European

¹ Annual detailed enterprise statistics for services (NACE Rev. 2 H-N and S95) [sbs_na_1a_se_r2] and Summary of annual road freight transport by type of operation and type of transport (1 000 t, Mio Tkm, Mio Veh-km) online data code: ROAD_GO_TA_TOTT (extracted on 21/10/20)

population. When looking at international transport kilometres, there is again an underrepresentation of the Southern European population but the overrepresentation applies to both Eastern and Western European clusters.

This is likely to be related to the particular interest of Eastern European stakeholders in this study as they are the ones who conduct the majority of affected journeys and are more associated with the longer distances they typically have to travel in order to pick up loads from Western European countries, and the business models they have in order to operate in this way. In addition to this, Southern European hauliers undertake less cabotage and cross-trade operations which are more likely to be impacted by the new obligation. Therefore, the misrepresentation does not significantly impact the results of the study.

This has been recognised during the analysis and stakeholder views have been used alongside Eurostat data to ensure that the results of the study remain objective.

Table 3-1: Hauliers survey sample distribution by Member State (% of total responses) compared to population of road transport enterprises in EU-27

Member State	2017 Total enterprises by Member State	Proportion of enterprises by Member State	2019 International million tonne-kilometres	Proportion of international transport by Member State	Proportion of hauliers by Member State who responded to the Ricardo survey
Belgium	7,494	1%	11,998	2%	0%
Bulgaria	13,245	3%	6,542	1%	33%
Czechia	30,979	6%	12,007	2%	0%
Denmark	4,644	1%	1,768	0%	1%
Germany	35,873	7%	31,721	6%	19%
Estonia	3,101	1%	1,332	0%	2%
Ireland	4,706	1%	569	0%	0%
Greece	16,653	3%	8,802	2%	0%
Spain	103,420	20%	73,916	13%	0%
France	31,043	6%	9,574	2%	0%
Croatia	5,304	1%	6,259	1%	0%
Italy	62,752	12%	12,916	2%	0%
Cyprus	785	0%	13	0%	0%
Latvia	3,165	1%	6,650	1%	1%
Lithuania	5,822	1%	35,711	6%	14%
Luxembourg	409	0%	6,412	1%	1%
Hungary	14,117	3%	20,538	4%	2%
Malta	N/A	N/A	N/A	N/A	0%
Netherlands	10,893	2%	29,763	5%	3%

Member State	2017 Total enterprises by Member State	Proportion of enterprises by Member State	2019 International million tonne-kilometres	Proportion of international transport by Member State	Proportion of hauliers by Member State who responded to the Ricardo survey
Austria	6,364	1%	7,912	1%	1%
Poland	86,834	17%	190,220	33%	7%
Portugal	7,654	1%	17,847	3%	0%
Romania	29,406	6%	36,728	6%	9%
Slovenia	5,549	1%	17,668	3%	0%
Slovakia	9,790	2%	20,838	4%	2%
Finland	8,987	2%	1,377	0%	3%
Sweden	14,378	3%	704	0%	1%
European Union - 27 countries (from 2020)	523,367	100%	569,785	100%	100%

Table 3-2: Hauliers survey sample distribution by Member State cluster (% of total responses) compared to population of road transport enterprises in EU-27

Member State Cluster	2017 Total enterprises by Member State cluster	Proportion of enterprises by Member State cluster	2019 International million tonne-kilometres	Proportion of international transport by Member State cluster	Proportion of hauliers by Member State cluster who responded to the Ricardo survey
West	124,791	24%	101,798	18%	30%
South	191,264	37%	113,494	20%	1%
East	207,312	40%	354,493	62%	69%
EU-27	523,367	100%	569,785	100%	100%

Other stakeholder survey responses

When looking at the samples across the other targeted stakeholder groups (national associations, national authorities and trade unions) in terms of the numbers of Member State per cluster, Table 3-3 shows that there was quite a low sample from Southern European national associations and trade unions, while the proportion of Member States represented across the Eastern and Western European Member States were higher. This

may be related to the greater anticipated impact on Eastern European Member States with respect to the market and authorities and the interest of Western European Member States with respect to the potential for a more level playing field in the EU road haulage market, potentially opening up opportunities for Western European companies.

Table 3-3: Split of survey responses from other stakeholder groups by Member State cluster

Member State Cluster	National associations	Trade unions	National authorities
West	7/10 (70%)	6/10 (60%)	5/10 (50%)
South	1/6 (16%)	2/6 (33%)	4/6 (66%)
East	7/11 (64%)	5/11 (45%)	7/11 (64%)

4 LIMITATIONS OF THE STAKEHOLDER CONSULTATION

This section focuses on limitations of our stakeholder consultation activities and to what extent these may affect the quality of data provided.

The short timeframe of the consultation limited the window of opportunity to carry out stakeholder interviews, particularly given the busy period being experienced by the road haulage sector (associated with COVID-19), the overlap of the summer holiday period and the challenge of engaging the relevant stakeholders. While mitigations were taken where possible to maximise the number of interviews, by identifying multiple back up contacts and extending the end date of the consultation, still only 15 interviews were carried out of the target of 26. Road hauliers in particular were difficult to reach during the stakeholder consultation, partly as a result of the nature of the market, comprising lots of small and medium sized enterprises or self-employed individuals, but also the language barrier. The study team sought to overcome these challenges by providing the survey in multiple languages and by reaching out to national associations to distribute the survey to their members, however there were still a number of Member States (identified in Section 2.2) from which no responses to the consultation were received. Stakeholders from Southern European Member States were particularly difficult to reach.

As mentioned via the surveys and interviews, the road haulage market was also impacted by the COVID-19 pandemic, related to travel restrictions and increased demand for goods associated with national lockdowns. This meant that stakeholders from all target groups had limited time and resource available to contribute to this study's targeted stakeholder consultation particularly given the short timeframe of the consultation window and time of year in which it took place.

Some stakeholders not available for interview and survey because of existing pressures of COVID. In one instance an interview with a trade union was cancelled as the interviewee had to be tested for COVID-19 on the day of the interview. It was not possible to rearrange this interview.

Despite these challenges, over 500 stakeholders were engaged in the stakeholder consultation for this study across 21 Member States and across the different stakeholder groups and overall when looking at responses particularly split by geographical Member State clusters, there is consistency between the stakeholder results and the data obtained from desk based research. Therefore the sample is considered robust for the purposes of the study.

4.1 Language / translations

Stakeholders were given the option of completing the survey in any of the official EU languages with the exception on Maltese and Irish. The translations were created using the EU survey machine translation tool. Where possible these were reviewed by native speakers to identify and address errors in the machine translations. However, a small number of issues were identified while the survey was open. Corrections were made at this stage and measures have been taken in the analysis stage to account for these issues:

- The English survey contained a scale of 'to a significant extent' and 'to major extent' in multiple choice answers, in languages: Czech, Danish, Latvian, Slovak, Spanish, French and German, both 'to a significant extent' and 'to major extent' were translated into 'to a significant extent'. In analysis, all language responses combined answers 'to a significant' and 'to major extent' to ensure consistent and comparable answers were provided. This affected questions 2.14, 2.15, 3.5.1 and 3.5.2 in the survey, after aforementioned corrections the survey analysis was not adversely affected.
- The English survey contained a likelihood scale with multiple choice options including 'very unlikely' and 'very likely'. In some languages, these options were both translated into 'very likely'. This issue was identified whilst the survey was live and subsequently all translations were updated. A timestamp was entered into survey responses to identify affected survey responses. The affected responses were reviewed to identify where a) the respondent appeared unable to identify differences in 'very likely' and 'very unlikely' and b) gave contradictory answers. This two-step approach resulted in identifying the affected responses for the specific questions. Eventually, this led to the deletion of the responses to the specific questions *only* for 1 of 22 affected Romanian responses and deletion of 2 of 5 affected Slovakian responses. This affected questions 3.1 and 3.3 in the survey. The affected Romanian and Slovakian participants were not contacted, given that this was such a small number of the overall sample (For question 3.1, there are 442 responses out of 486 after deletion and for question 3.3 there are 374 out of 486 after deletion.) we have not pursued this as it does not adversely affect the results. To clarify, answers to the particular questions where the translation issue was found (and not their entire response to the survey) were discarded.

On the basis that responses were submitted in 20 different languages in addition to English, it is felt that this was a valuable way of reaching a wider audience and may have contributed to the response rate.

5 PRESENTATION OF STAKEHOLDER INPUTS

The following sections summarise inputs from stakeholders provided during the targeted consultation via the surveys, interviews and data requests. We first present findings related to the current situation, i.e. business practices and market situation, before looking at the potential impacts as reported by stakeholders.

5.1 Current business practices and market situation

5.1.1 Background on road transport operators

Stakeholders were asked to provide information on their current practices, used to provide context to the study analysis and the interpretation of the responses.

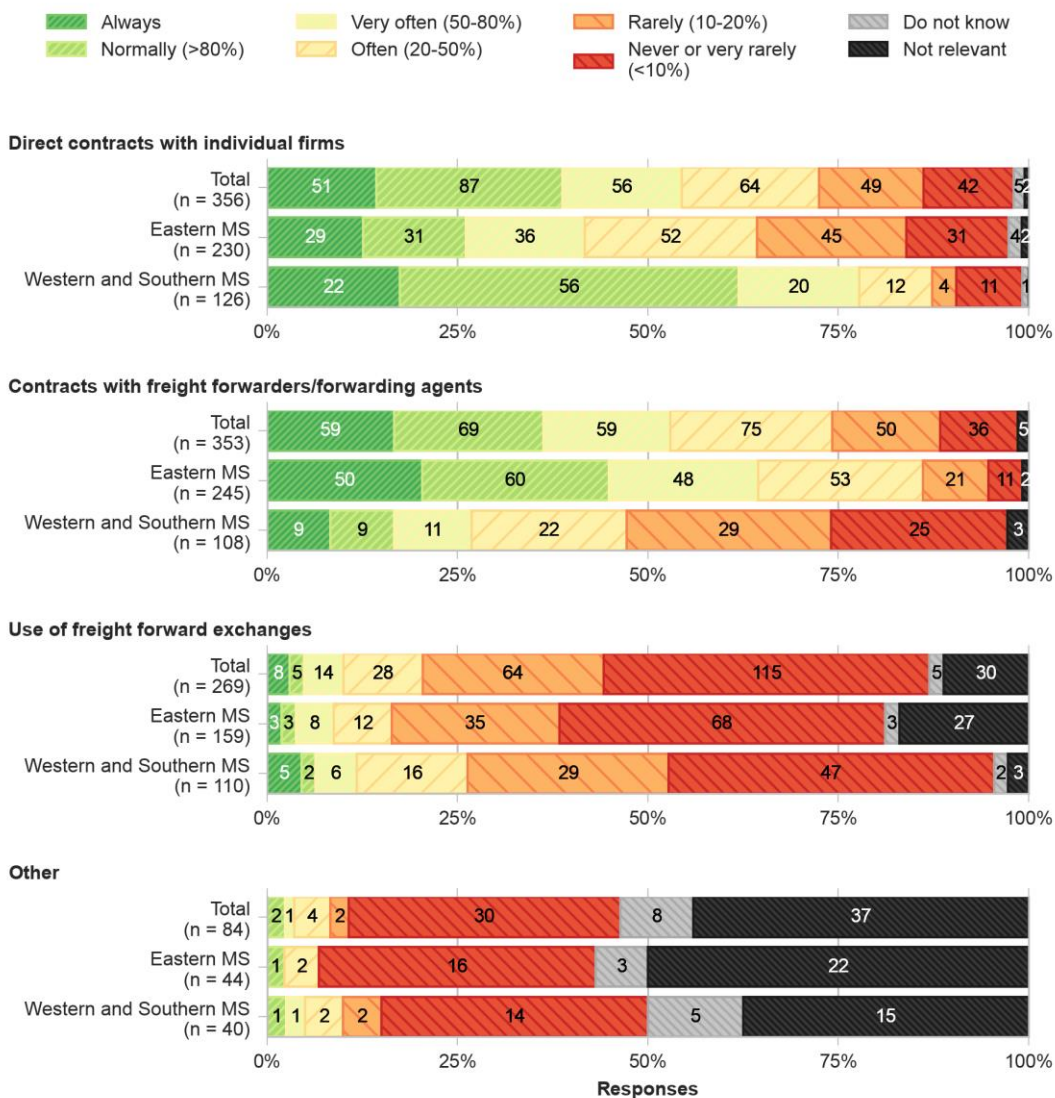
Over half of those companies (road haulage or freight forwarders) who responded to the survey reported generating revenues of over 1 million Euros (243 out of 411, or 59%) in

2019. This compared to 51 companies making 500,000 – 1 million Euros, and 117 out of 411 making up to 500,000 Euros.

When looking at the size of companies who responded to the survey, 370 out of the 421 (88%) who answered indicated that their organisation falls within the category of a small or medium sized enterprise. This comprised 18 self-employed, 104 micro enterprises (less than 10 employees), 140 small enterprises (10 - 50 employees) and 108 medium sized enterprises (50 – 250 employees). This supports our understanding that the EU road haulage market is dominated by small and medium sized enterprises.

Figure 5-1 highlights the major role of subcontracting in the road haulage market. Overall, 128 out of 356 (35%) hauliers (those involved in hire and reward operations) responded that they either always or normally rely on contracts with freight forwarders or forwarding agents, with additional 59 out of 356 (17%) stating that they very often use this contractual arrangement. Direct contracts with individual firms are much more common in western and southern European countries, while subcontracts with freight forwarders or forwarding agents are found more often in Eastern European countries. Survey respondents indicate a very limited use of freight forward exchanges.

Figure 5-1: Survey responses to “If your firm undertakes road haulage services for third parties (hire and reward), how often does the firm obtain business in the following ways?”



Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision

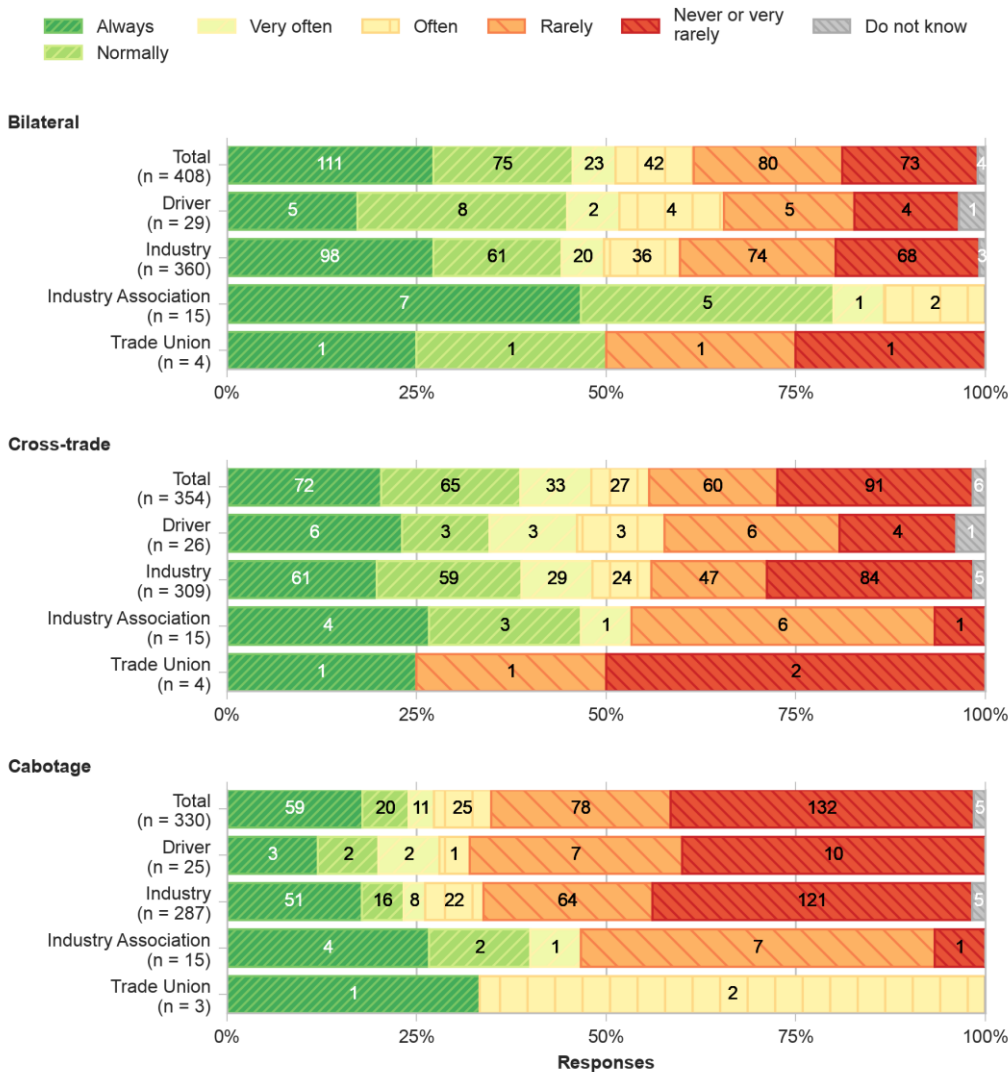
of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations. The total responses vary as not all stakeholders provided an answer to all options.

5.1.2 International transport operations and truck cycles

Stakeholders were asked to elaborate on their international transport operations, including the length of truck cycles, i.e. the duration a truck is away from the Member State of Establishment, and the type of operations they carry out associated with shorter and longer truck cycles. While focus is placed on the responses by road haulage operators, results from national associations and trade unions were used to triangulate responses.

Overall, there was a general consensus of the types of international operations carried out across the stakeholder groups, as shown in Figure 5-2. Bilateral operations were reported as being carried out ‘always’, ‘normally’ or ‘very often’ by 203 out of 408 respondents (51%), compared to 170 out of 354 (48%) for cross-trade and 90 out of 330 (27%) for cabotage.

Figure 5-2: Survey responses to “What was the share of bilateral, cross trade and cabotage operations that you firm carried out in 2019 (as a percentage of the total tonnage of freight transported)?”



When asked to provide the most important countries with respect to the different types of operation, the following countries were identified as the top five (Table 5-1):

Table 5-1: Top five most important countries between or within which firms undertake each of the following types of operation (in terms of tonnage transported)

Top 5 countries	Bilateral operations	Cross trade operations	Cabotage operations
1	Germany – 79%	Germany – 79%	Germany – 74%
2	Belgium – 51%	France – 56%	France – 47%
3	Netherlands – 49%	Belgium – 54%	Netherlands – 22%
4	France – 48%	Netherlands – 49%	Belgium – 21%
5	Italy – 38%	Italy – 40%	Italy – 14%

These Member States are considered important in terms of where most of the trade is taking place.

The top five most important Member States indicated by the stakeholders were the same for bilateral, cross trade and cabotage operations. All of the countries are linked to the 'Blue Banana' corridor as the top four most important countries, Germany, Belgium, Netherlands and France are all from Western Europe whilst Italy, the fifth most important is from the northern part of Southern Europe, linked to the corridor through cities such as Milan.

Germany was the most important across each operation by a significant margin and was selected by 335 out of 425 for bilateral, 273 out of 345 for cross trade and 229 out of 308 for cabotage. Belgium, Netherlands and France shared similar selection rates as the second, third and fourth most important except for cabotage in which there was a marked difference between second and third most important, France and Netherlands respectively. Italy, the only country from Southern Europe, was the fifth most important across each type of operation.

5.1.3 Frequency of truck returns

Within the survey, stakeholders were asked to indicate the frequency that their trucks return from international operations to the Member State of Establishment. Table 5-2 shows that the frequency of return of trucks varies by Member State. According to those road hauliers conducting hire and reward operations that participated in the survey, their vehicles tend to return more frequently (i.e., six or more times a year) if they are based in Western European Member States compared to Eastern European Member States. The input on the frequency of return of operators established in Southern Member States suggests that they exhibit similar patterns to those of Western European Member States however this data should be interpreted carefully as only a very small number of responses from these operators was received.

Overall, a pattern still emerges from the data provided by road hauliers conducting hire and reward operations, although the sample is relatively small (only 307 hauliers surveyed which use 24,233 vehicles provided a response).

Table 5-2: Share of vehicles used in international operations per frequency of return based on the responses of hauliers engaged in hire and reward operations

Truck cycles	Long cycles (over eight weeks)					Short cycles (eight weeks and under)	
	Once a year	Twice a year	Three times a year	Four times a year	Five times a year	Six times a year	More than six times a year
West	20%	2%	1%	0%	0%	0%	76%

Truck cycles Area of establishment	Long cycles (over eight weeks)					Short cycles (eight weeks and under)	
	Once a year	Twice a year	Three times a year	Four times a year	Five times a year	Six times a year	More than six times a year
East	44%	11%	3%	7%	7%	10%	17%
South	2%	0%	0%	0%	0%	0%	98%

Note: Total number of vehicles covered by the surveyed hauliers conducting hire and reward operations are 24,233, of which 17,303 are used by operators established in Eastern Member States, 5,356 are used by operators established in Western Member States and 307 are used by operators established in Southern Member States. Input received from hauliers established in all Member States except BE, IE, EL, HR, CY, SI, SE.

Further analysis of the inputs from the surveys and interviews as well as data requests provided by other stakeholder groups (industry associations, trade unions, drivers, and national authorities) largely confirms the conclusions above on the differences between the frequency of return of trucks from Western, Southern and Eastern European Member States, including the variations observed within the Member State clusters.

In terms of the Member States considered most prominent when it comes to longer truck cycles, the stakeholder interviews highlighted that Eastern European countries were most often identified as the Member States of Establishment where longer truck cycles are more common, with Romania, Bulgaria, Lithuania and Poland frequently selected. These longer truck cycles correlate with the large distance between the home Member State and the Member States selected in the top five most important countries for trade above.

The input from Western European national industry associations (DK, DE, FR, AT, SE, IE, LU, NL) indicates that vehicles used by their members always return more than six times per year to the Member State of establishment. Only the Finnish association suggested that 20% of the trucks used by their members return once or twice a year.

With respect to Eastern European national industry associations, their input varies: the Czech, Hungarian and Slovenian associations also indicated that their members' vehicles always return more than six times per year to the Member State of establishment; on the other hand, three Bulgarian associations suggested that the majority of their members' vehicles return six or less times per year whilst the Polish association confirmed via the data request that about 49% of trucks involved in international operations return six or more times per year. In addition, the Lithuanian association responding to the data request confirmed that 22% of vehicles return six or more times per year in line with the input provided by hauliers based in this country. The Romanian association also suggested (via the data request) that 80% of trucks involved in international operations return once a year.

The input from trade unions on this particular indicator is limited. A Bulgarian trade union indicated that trucks normally return to their operational centres once or twice a year; they never or rarely return more than six times a year. On the other hand, an Italian trade union noted that trucks always return more than six times a year.

Drivers employed by hauliers established in Western European countries mostly indicated that trucks always return to their operational centres more than six times per year (six of seven responding). The views of drivers working for hauliers from Eastern European countries is more diverse, with about half indicating (11 of 19 responding) that trucks return less than six times per year.

Some authorities provided specific data and information in response to the national authorities' survey that is largely in line with the findings above:

- The Italian authority explained that the majority of the vehicles registered in their country return more than six times a year according to information received from the operators.

- The Maltese authority indicated that 100% of the vehicles used by operators established in their country always return more than six times a year to their operational centres but these are typically located close to the harbours in Italy to which RoRo (Roll-on/roll-off) ships operate from Malta (e.g. Genoa, Livorno). In the follow-up interview with this stakeholder, they clarified that only operators whose vehicles operate in Southern Italy return regularly to Malta (on a weekly basis); other trucks operating in Northern Italy and Europe return regularly to the harbours in Northern Italy, explaining that trucks almost never return to Malta since the cargo is first transported by sea and therefore there is no need to bring back the vehicle itself.
- The Romanian labour inspection authority indicated that 90% of the trucks registered in their country return four times in a year.
- The Bulgarian authority clarified that vehicles registered in their country that are under 10 years need to return at least once a year, and vehicles over 10 years return at least twice a year due to the roadworthiness test.
- The Slovenian and Estonian authorities indicated that 85% and 50% of the vehicles used by operators established in their country, respectively, return more than six times a year.

Via the data requests, the authorities from Luxembourg, and Netherlands all confirmed that almost all trucks return six or more times per year. On the other hand, the Lithuanian authority confirmed that only 22% of vehicles return six or more times per year.

Based on this, the following conclusions have been made. In the case of Western Member States, national industry associations (responses from DK, DE, FR, AT, SE, FI, IE, LU), and drivers surveyed (responses from drivers working for AT, DE companies) also suggest that the vehicles of hauliers established in these countries are mainly engaged in cycles shorter than eight weeks and tend to return six or more times per year to their operational centre. The input provided by the Finnish hauliers (suggesting a similar share of trucks involved in both shorter and longer cycles) is somewhat verified by the input provided by the national industry association. This association also suggested that their members operate a range of cycle durations (i.e. the larger share operates shorter cycles, but the remaining can be engaged in very long cycles, i.e., only return once or twice a year). On the other hand, the input provided by Dutch hauliers (suggesting they might be involved in longer cycles) was not verified by the input subsequently provided by the industry association and national authority provided via the additional data request; their input suggests that the practices of Dutch hauliers are similar to those other West-based hauliers (i.e., vehicles return more frequently). Given that only a smaller number of responses were obtained from hauliers based in the Netherlands, the input provided by their association and authority are deemed to be more representative and are used in the analysis presented in the main report.

In the case of Southern European Member States, the limited input received from trade unions (responses from IT) and national authorities (responses from IT, MT) also suggests that they are involved in shorter truck cycles mainly. However, it is worth highlighting the particular case of Maltese hauliers whose vehicles that operate in Northern Italy and Europe do not return to Malta as cargo is transported by ship to the island. The overall limited input received from all stakeholders based in these countries suggests that the provision might not be as relevant to them (i.e. minimal impacts expected) which might indicate they undertake predominantly shorter cycles.

On the other hand, trucks used by hauliers established in Eastern Member States appear to be mainly engaged in cycles longer than eight weeks, i.e., tend to return less than six times per year to their operational centre, according to the input provided by national industry associations (responses from CZ, HU, SI, BG, PL, LT), trade unions (responses from BG), drivers (responses from drivers working for PL, RO, BG, LT, EE, SK companies) and national authorities (responses from RO, BG, SI, EE, LT). Their input also confirms the variation within the group of Eastern Member States suggested by the surveyed hauliers:

- Czech and Hungarian operators appear to be mainly involved in shorter cycles according to the input provided by their national associations. This also seems to be the case for Slovenian hauliers according to the input received from the national industry association and the national authority.
- Estonian hauliers might have a similar share of trucks involved in both shorter and longer cycles, according to the responses from the national authority. A similar pattern was suggested by the input provided by Polish hauliers and subsequently confirmed by the Polish industry association via a data request.

In addition, no input was obtained for Belgium, Greece, Cyprus and Croatia following the main consultation period and the data requests. Therefore, the analysis assumes that their patterns in terms of truck cycle duration are similar to those of their relevant Member State cluster.

Combining the input from the consulted hauliers, industry associations, trade unions, drivers, and national authorities obtained from the survey, interviews and data requests, Table 5-3 shows the current frequency of return of trucks by Member State cluster extrapolated to the entire EU fleet used in international road freight transport.

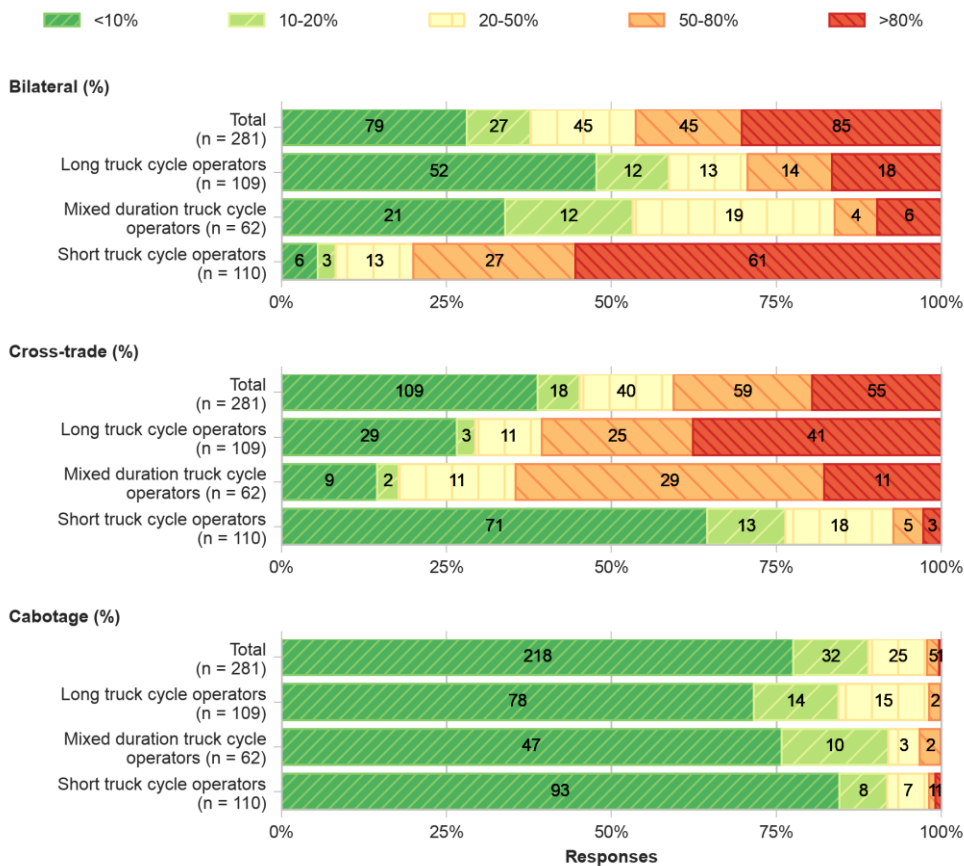
Table 5-3: Share of vehicles used in international operations per frequency of return for Western, Eastern and Southern European Member States

Truck cycles	Long cycles (over eight weeks)					Short cycles (eight weeks and under)	
	Once a year	Twice a year	Three times a year	Four times a year	Five times a year	Six times a year	More than six times a year
West	0%	0%	0%	0%	0%	0%	100%
East	32%	9%	2%	2%	7%	5%	43%
South	0%	0%	0%	0%	0%	0%	100%

Type of operations by truck cycle

Examining whether there is a difference in the type of international operations carried out on long cycles (over eight weeks) compared to short cycles (eight weeks and under), the breakdown of responses from those who carry out hire and reward operations, by cycle duration (as per Figure 5-3) reveals that cross-trade operations are more relevant for long truck cycle operators: 66 of 109 hauliers (61%) long truck cycle operators responding indicated that cross-trade operations represented over 50% of the total tonnage of freight transported in international operations in 2019, compared eight of 110 (7%) of short truck cycle operators responding). The opposite pattern can be observed for bilateral operations, with 88 of 110 short truck cycle operators (80%) indicating that bilateral operations represented over 50% of the total tonnage of transported in international operations in 2019, compared 32 of 109 (29%) of long truck cycle operators responding. There are however no significant differences observed for cabotage operations, with the majority of respondents (218 of 281, i.e., 78%) indicating that cabotage operations represented less than 10% of the total tonnage of transported in international operations in 2019.

Figure 5-3: Survey responses to “What was the share of bilateral, cross-trade and cabotage operations that your firm carried out in 2019? As a percentage of the total tonnage of freight transported in international operations in 2019”



Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

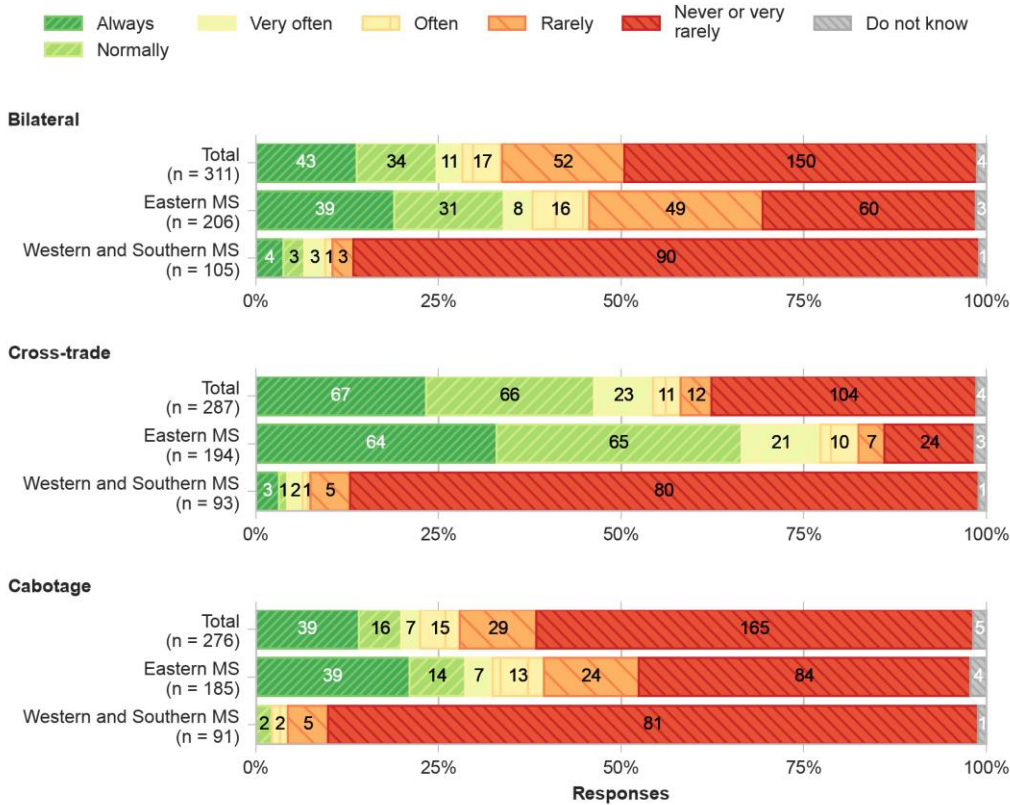
Similarly, all stakeholder groups were also asked directly what type of operations shorter and longer truck cycles typically include as part of two different questions. Figure 5-4 shows that cross-trade operations tend to be part of longer truck cycles: the majority of stakeholders responding (156 out of 287, 54%) indicated cross-trade operations are ‘always’, ‘normally’ or ‘very often’ included. There are however significant differences between Eastern European and Western and Southern European stakeholders responding, with the former suggesting that cross-trade are more likely to be included in longer cycles (150 of 194, 77%) compared to Western and Southern European stakeholders (5 of 93, 5%).

Compared to cross-trade operations, cabotage is less likely to be included in longer cycles (Figure 5-4): only 62 out of 276 stakeholders responding (25%) indicated cabotage operations are ‘always’, ‘normally’ or ‘very often’ included. As before, there are significant differences between Eastern European, and Western and Southern European stakeholders responding: amongst the 185 Eastern European stakeholders responding, 60 (32%) suggested cabotage operations are ‘always’, ‘normally’ or ‘very often’ included compared to four of the 91 Western and Southern European stakeholders responding (4%).

The variation between Member State groups could indicate that the type of operations typically included in longer cycles undertaken by Eastern European stakeholders

compared to Western and Southern European stakeholders varies and there is no common pattern of operations undertaken in longer cycles.

Figure 5-4: Survey responses to “What type of operations did truck cycles longer than 8 weeks typically include?”



Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

On the other hand, Figure 5-5 shows the results for shorter cycles: 134 out of all 289 stakeholders responding (46%) indicated cross-trade operations are ‘always’, ‘normally’ or ‘very often’ included, whereas 68 out of 271 stakeholders responding (25%) indicated cabotage operations are ‘always’, ‘normally’ or ‘very often’ included. In this case, variations between Eastern European, and Western and Southern European stakeholders responding are smaller.

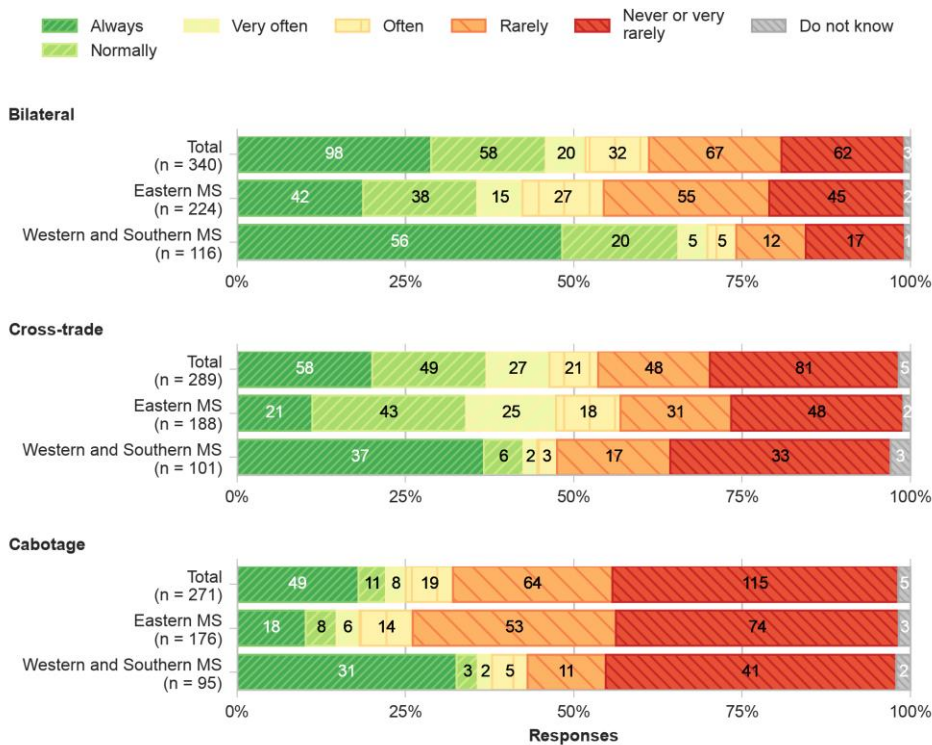
Comparing the results for shorter cycles (Figure 5-5) to the results for the longer cycles (Figure 5-4), the differences are small:

- 54% compared to 46% of the total respondents suggested that cross-trade operations are always/normally/very often included in longer and shorter cycles, respectively.
- 25% compared to 25% of the total respondents suggested that cabotage operations are always/normally/very often included in longer and shorter cycles, respectively.

This suggests that there is no specific nor distinct pattern of operations included in shorter and longer cycles as they often seem to include all types of transport operations. The findings from the exploratory interviews had already suggested that these cycles can be very complex and include a variety of journeys and operation types (i.e. combination of bilateral, cross-trade and cabotage operations) determined by the need to maximise efficiency of operations.

The comments provided in the surveys and input from the interviews provides further details. According to BGL (a German national industry association) and the Estonian authority, cross-trade operations are associated with less frequent returns to Member State of establishment. BGL also mentioned that illegal cabotage is widely observed in these longer cycles. Regarding shorter cycles, the Estonian authority added that bilateral and cross-trade operations tend to be included in shorter cycles. Cabotage operations are also undertaken as part of these shorter cycles to prevent unladen journeys on the return. TLN (a Dutch industry association) also added that there is no sequence in particular in shorter truck cycles, with a higher number of bilateral operations followed by cross-trade operations and only a smaller share of cabotage operations.

Figure 5-5: Survey responses to “What type of operations did truck cycles shorter than 8 weeks typically include?”



Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

Type of operators involved in longer vs shorter truck cycles

This analysis focusses on the input provided by the surveyed hauliers conducting hire and reward operations, exploring differences between those that only undertake short or long truck cycles.²

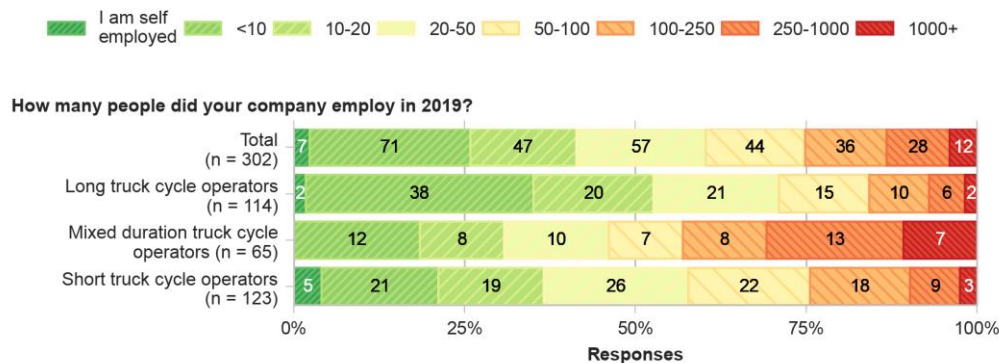
In terms of the size of the road haulage operators, there appears to be only small differences in terms of the number of employees between those road haulage companies mainly undertaking long truck cycles compared to those mainly undertaking short truck cycles: Figure 5-6 shows that long truck cycle operators responding had slightly fewer

² A third category is considered in the charts and includes the responses of operators that have indicated that their vehicles undertake a mix of short and long cycles. Given the small number of responses included in this category, we have not analysed their input in this section.

employees in 2019 (60 of 114, equivalent to 53% indicated fewer than 20 employees) compared to the short truck cycle operators responding (45 of 123, or 37% indicated fewer than 20 employees).

It is worth considering that most of the road haulage companies responding have a relatively small number of employees (fewer than 50 – see Figure 5-6) however the respondents appear to be larger employers than the average company in the market as covered in the main report.

Figure 5-6: Survey responses to “How many people did your company employ in 2019?”

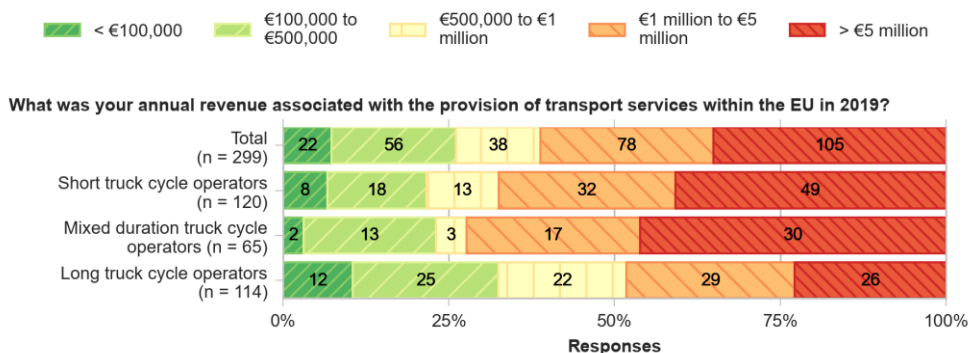


Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

Figure 5-7 shows a similar picture in terms of annual revenue: long truck cycle operators responding had slightly lower revenues in 2019 (59 of 114, i.e., 52% indicated less than €1 million revenues) compared to the short truck cycle operators responding (39 of 120, i.e., 33% indicated less than €1 million revenues).

As before, it is worth noting that many respondents have a larger turnover than the average company in this sector as covered in the main report.

Figure 5-7: Survey responses to “What was your annual revenue associated with the provision of transport services within the EU in 2019?”

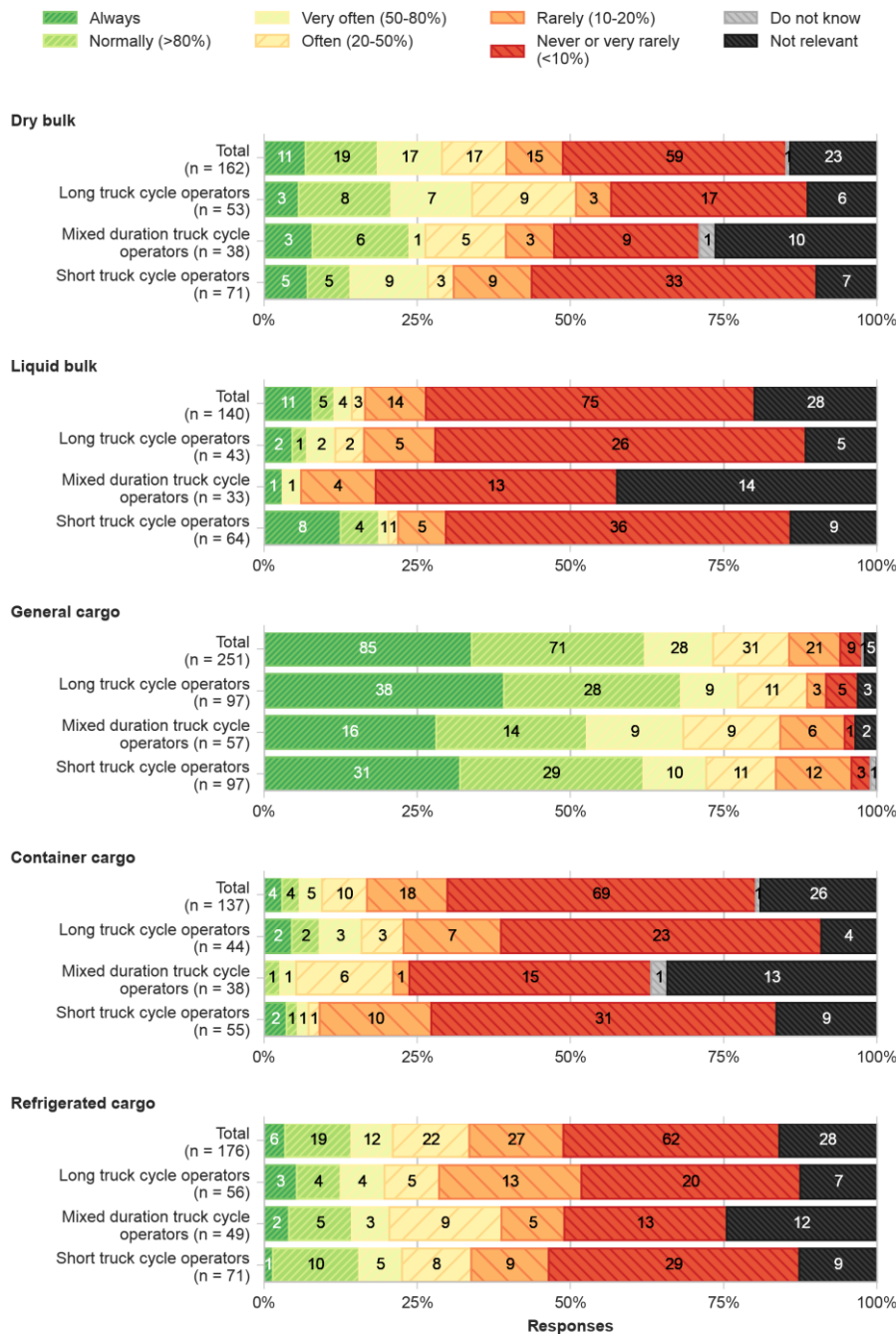


Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

Type of cargo transported

With respect to the type of cargo transported, Figure 5-8 shows minimal differences between those road haulage companies mainly undertaking long truck cycles compared to those mainly undertaking short truck cycles across the different types of cargo identified (i.e., dry bulk, liquid bulk, general cargo, container cargo, refrigerated cargo). Regardless of the duration of the truck cycles, there appears to be a highest proportion of road haulage companies surveyed that transport general cargo: 234 of 318 respondents (74%) indicated that they always/normally/very often transport general cargo.

Figure 5-8: Survey responses to “What type of cargo did your firm transport in 2019?”



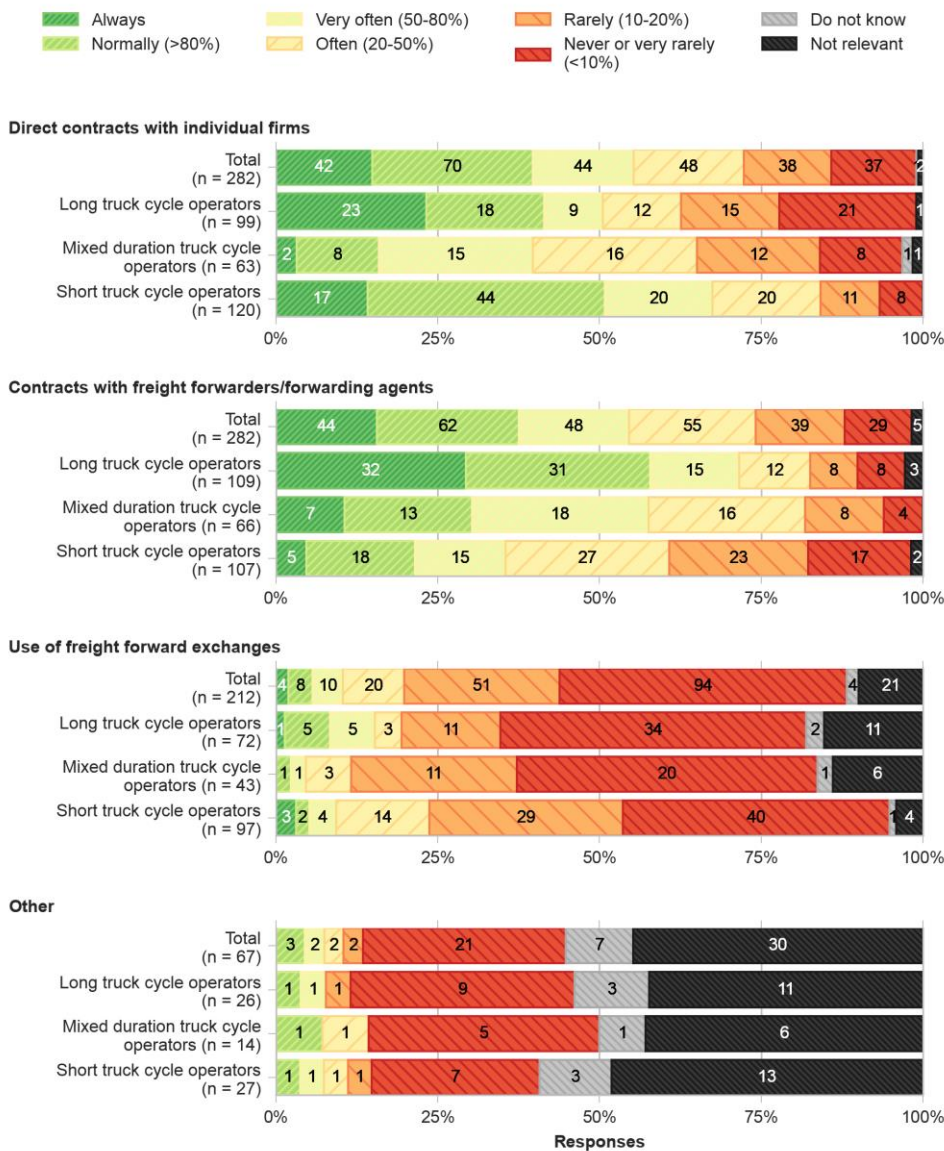
Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six

times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

Contract arrangements

The survey results illustrated in Figure 5-9 suggest that long truck cycle operators might obtain more business via contracts with freight forwarders/forwarding agents (78 of 109, i.e., 72% of the long truck cycle operators indicated they always/normally/very often obtain business in this way compared to 38 of 107, or 36% of short truck cycle operators that responded in a similar way), whereas short truck cycle operators are only marginally more likely to obtain business via direct contracts with individual firms (81 of 120, or 68% of the short truck cycle operators indicated they always/normally/very often obtain business in this way compared to 50 of 99, equivalent to 51% of long truck cycle operators that responded in a similar way). For both short and long truck cycle operators, the results suggest that they do not typically obtain business through freight forward exchanges.

Figure 5-9: Survey responses to “If your firm undertakes road haulage services for third parties (hire and reward), how often does the firm obtain business in the following ways?”

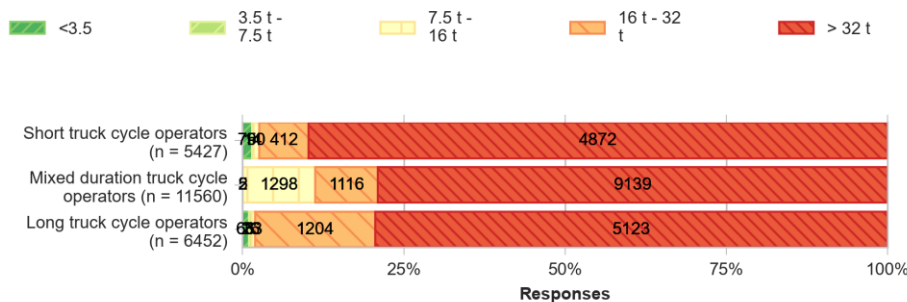


Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

Type of vehicles used in international transport operations

When looking at the type of vehicles used in international transport operations, it is apparent that operators involved in all types of cycle durations favour trucks over 32 tonnes. This suggests that vehicles used in international trips of all kinds are more likely to be larger vehicles than smaller vehicles. This is based on Figure 5-10 below which shows the types of vehicles (in maximum permissible weight) typically used by operators involved in long cycles only, short cycles only, and a mix of long and short cycles. The total number of vehicles indicated in the survey responses are used as counts for this chart to better represent the shares of vehicle types used (as one respondent can use multiple types of vehicles).

Figure 5-10: Survey responses to “What types of vehicles did you have at your disposal (i.e., vehicle fully owned, hired or leased) in 2019 that were used for international operations?” (in maximum permissible weight split by operators involved in long cycles only, short cycles only, and a mix of long and short cycles)



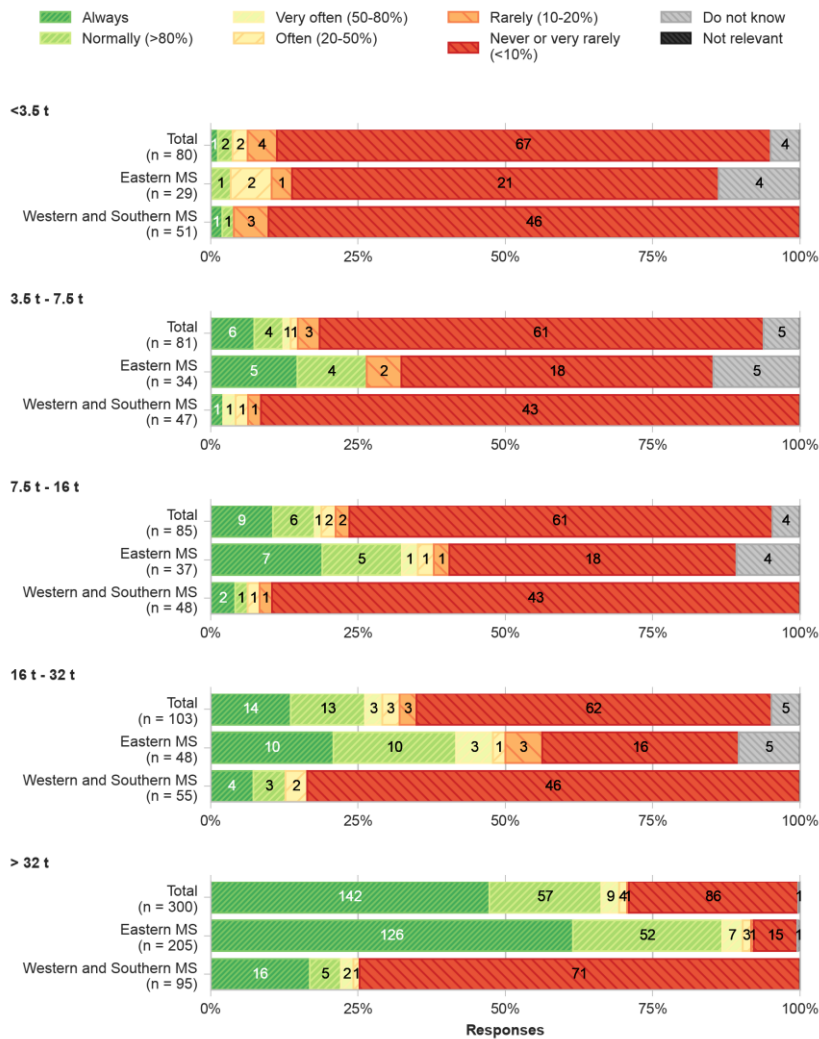
Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

Similarly, all stakeholder groups were also asked directly what type of vehicles shorter and longer truck cycles typically include as part of two different questions.

When asked which types of vehicles are typically used for longer cycles (Figure 5-11), the highest GVW category used in longer cycles was over 32 tonnes, with 208 out of 300 (69%) of respondents selecting either ‘Always’, ‘Normally (>80%)’ or ‘Very Often (50-80%)’ under the over 32 t category. The proportion was much higher (185 out of 205, 90%) for Eastern hauliers compared to Western and Southern hauliers (23 out of 95, 24%).

When asked which types of vehicles are typically used in shorter cycles out of (66%) selected ‘Always’, ‘Normally (>80%)’ or ‘ (50-80%)’ for the over 32 t category. This is slightly lower than the proportion of 32 t vehicles being used in longer cycles, but it is still a high proportion which could indicate that heavier vehicles are used more in international trips than domestic, rather than signifying any differences in long or short cycle trips 277183 (Figure 5-12). The differences between Eastern hauliers (99 out of 172, 58%) and Western and Southern hauliers (84 out of 105, 80%) were not as clear as for the vehicles used for long cycles. In fact, a higher proportion of over 32t trucks is used in short cycles by the Western and Southern hauliers compared to Eastern hauliers.

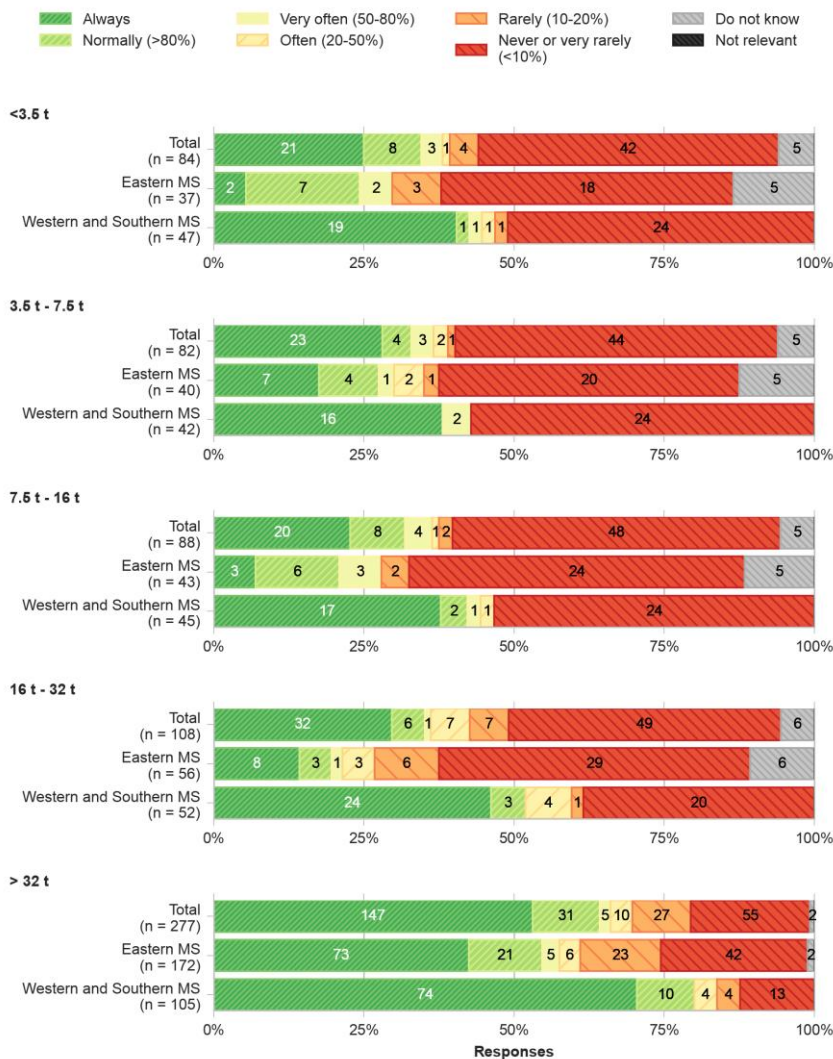
Figure 5-11: Survey responses to: "What types of vehicles are typically used for long truck cycles?"



Source: Survey of stakeholders undertaken for this study.

Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

Figure 5-12: Survey responses to: "What types of vehicles are typically used for short truck cycles?"



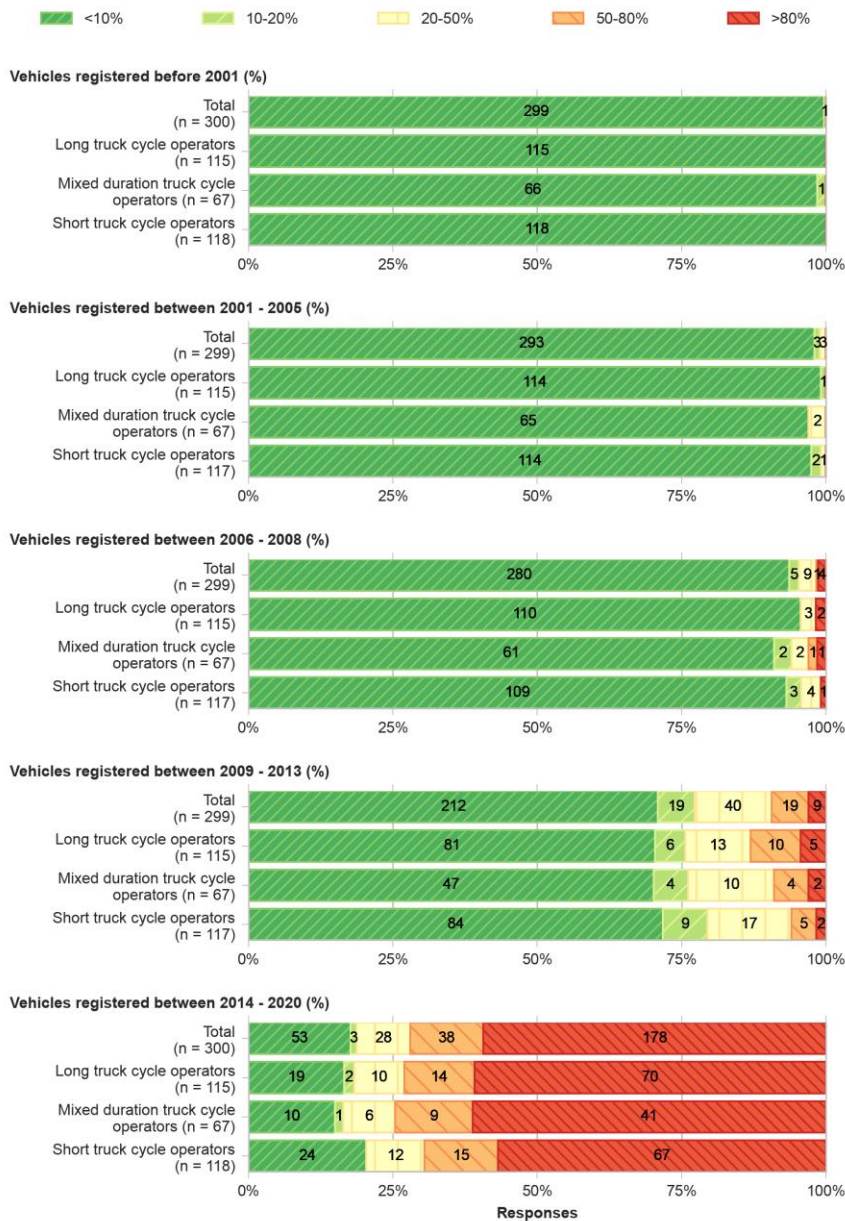
Source: Survey of stakeholders undertaken for this study.

Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

In terms of the age of vehicles used in international operations, again there is no significant difference between the different lengths of truck cycle. The majority of hauliers are using fleets primarily consisting of vehicles registered between 2014 and 2020. 178 out of 300 hauliers (60%) indicated that at least 80% of their fleet consisted of these newer vehicles, whilst nine out of 300 (4%) reported that at least 80% of their fleet consisted of vehicles registered between 2009 and 2013. The results presented in Figure 5-13 suggest that most operators have a higher proportion of the newest vehicles (registered 2014 – 2020) in their fleets, with slightly older vehicles (registered between 2009 – 2013) making up most of the rest of the fleet.

Figure 5-13: Survey responses to "Considering the vehicles at your disposal in 2019 that were used for international operations, when were they first

registered? Please indicate the approximate share of vehicles by year of first registration."



Capacity to source cargo

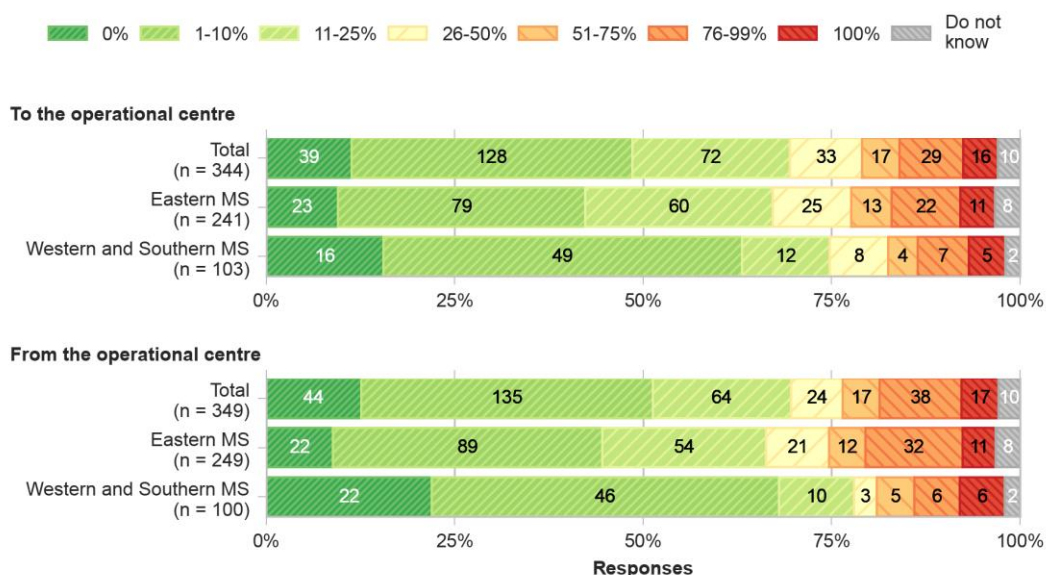
In order to understand the impacts of the measure on empty runs, it was first important to ask about the current capacity for hauliers to source cargo in current truck cycles. Stakeholders were asked to indicate the proportion of distance run empty by vehicles on journeys to and from the operational centre.

Figure 5-14 suggests that there are differences in the level of empty running that hauliers experience in the inbound and outbound journeys to their Member State of Establishment. Overall, Western European Member States' survey responses indicate slightly lower levels of empty running compared to Eastern Member States:

- For journeys to the operational centre, the larger share of Western and Southern European Member State respondents (49 of 103, 47%) identified 1-10% empty runs; for journeys from the operational centre, 46 of 100 (45%) Western and Southern European Member State respondents also identified 1-10% empty runs.
- In the case of Eastern European Member States, the larger share of their responses points to 1-10% of empty running (79 of 241 to, equivalent to 33%,

and 89 of 249, equivalent to 36% from the operational centre). This result may be related to the fact that a high proportion of those survey responses received from Eastern European hauliers came from peripheral Member States such as Bulgaria and Lithuania and therefore may have to travel further after leaving the operational centre to collect a load.

Figure 5-14: Survey responses to “Approximately what proportion of the distance run by vehicles in journeys to/from the operational centre in current truck cycles is run empty?”



Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

Further to this, the survey asked hauliers to indicate the main constraints that affect their ability to find a load for international journeys. Figure 5-15 and Figure 5-16 present stakeholder views on the factors affecting journeys to and from the operational centres.

The majority of respondents from Eastern European Member States identified the following factors as significantly constraining loaded journeys to and from the operational centre:

- Low demand for freight from the country of establishment (207 of 240 respondents) and to the operational centre (227 of 245 respondents);
- Risk of delaying the next delivery to the operational centre (119 of 214 respondents); and
- Lower freight rates for backload operations from the operational centre (178 of 212 respondents) and to the operational centre (209 of 232 respondents).

Participants from Western and Southern Member States did not identify a single factor which significantly constrained journeys to or from the operational centre, with the majority suggesting that these factors are not at all responsible for the empty running.

Figure 5-15: Factors Constraining Journeys to Operational Centre

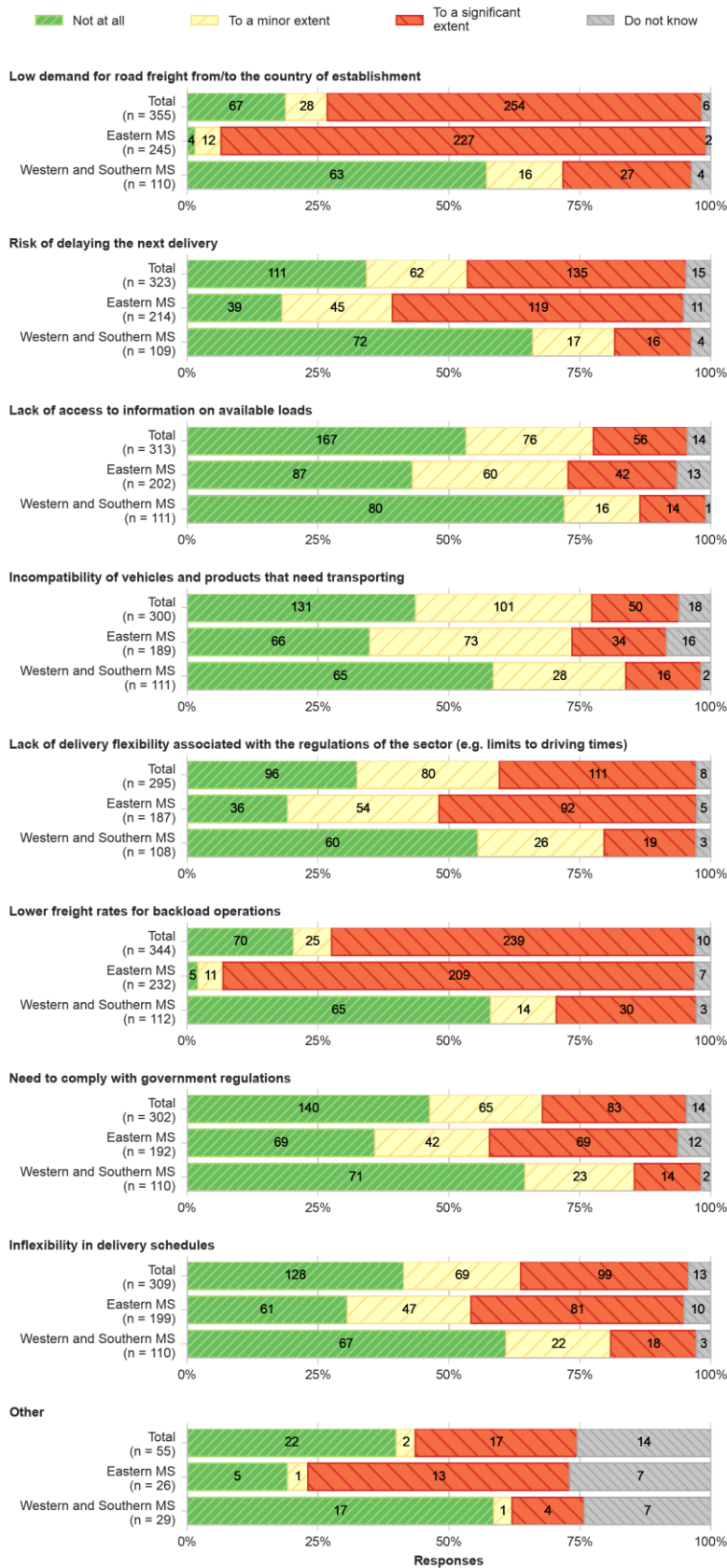
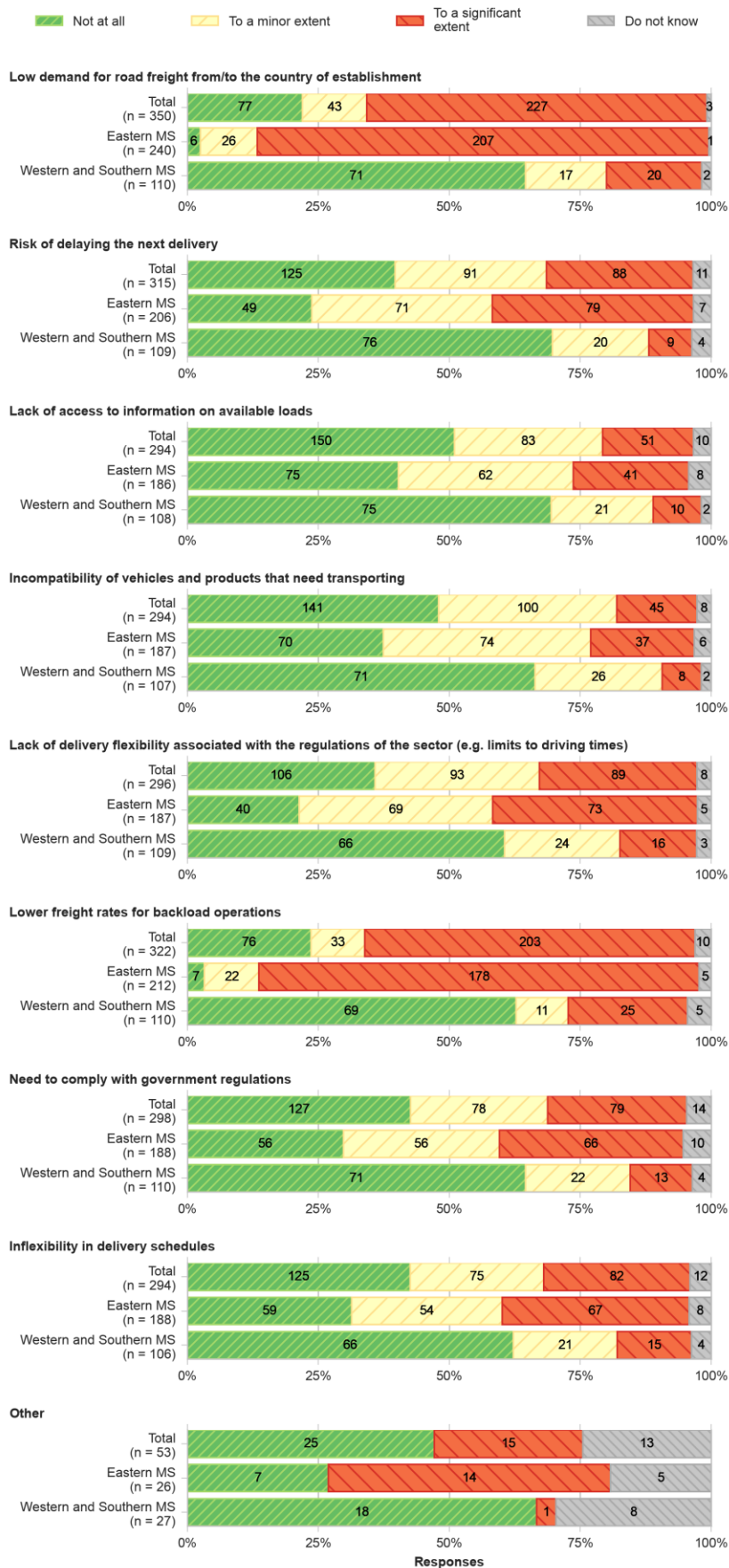
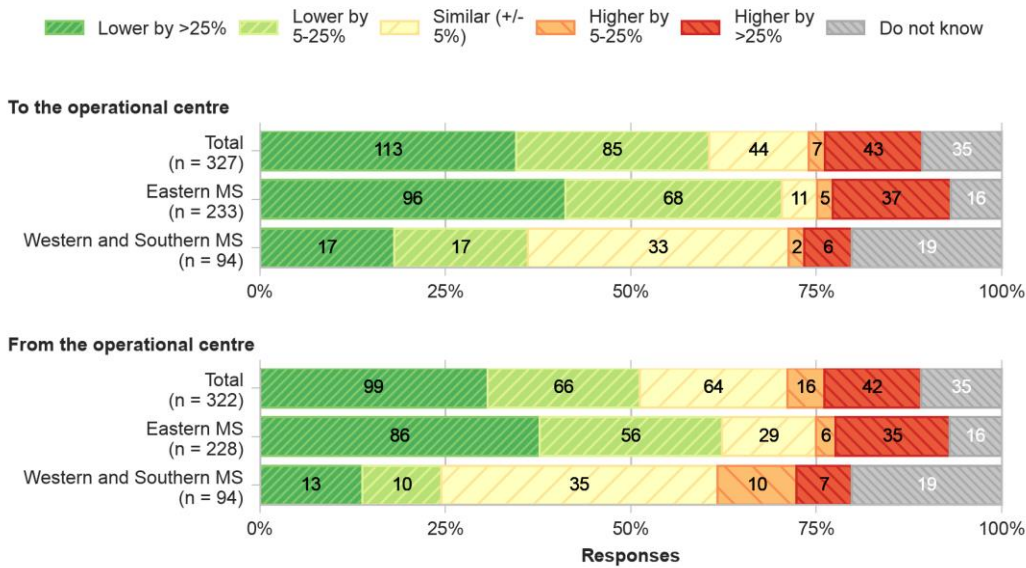


Figure 5-16: Factors Constraining Journeys from Operational Centre



Hauliers were also asked about international freight rates to and from the operational centre in current truck cycles, compared with the average rates that can be obtained across all transport operations. As per Figure 5-17, the most common answer from Western and Southern Member States was that international freight rates to and from operational centres are similar to the average (33 of 94 and 35 of 94 respondents, respectively). The most common response received from Eastern European hauliers was that freight rates to and from operational centres (96 of 233 and 86 of 228 of respondents, respectively) were 25% less than the average rates they would obtain through cabotage or cross-trade operations.

Figure 5-17: Survey responses to “In your experience, how do freight rates for journeys to/from the operational centre in current truck cycles compare with the average rates that can be obtained across all transport operations?”



Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

5.1.4 Factors affecting duration of truck cycles

When asked in interviews to describe the main factors affecting the duration of truck cycles, 8 out of 15 of stakeholders (comprising the DE, DK, EE, and NL associations, hauliers from FI, LT and PL; and the LV authorities) said that this relates to the structure of the market, such as where contracts are in place, and the geographical distances between the supply of goods and demand for goods or where the contracts are in place. The availability of drivers was also mentioned as a factor by five out of the 15 stakeholders interviewed (LV authorities, BG, DE and NL associations; and the DK haulier). There was a general consensus from the interviews that while there are seasonal variations in specific goods, demand for goods overall is consistent across the seasons, meaning road haulage operations are stable throughout the course of a year.

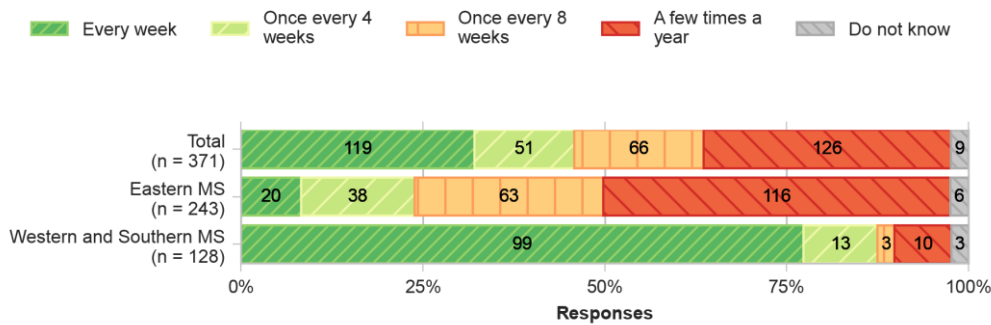
5.1.5 Frequency of returns of drivers

The survey asked about the current frequency of return of drivers. As presented in Figure 5-18, 192 out of 371 who responded to this question, stated that the frequency of return of drivers was less frequent than once every 4 weeks. From these, 179 are from Eastern European countries, while only 13 are from Western or Southern Member States. This

indicates that drivers working for hauliers established in Eastern European countries are returning less often to their homes. Many hauliers who responded to the survey argue that some drivers prefer to stay away from their country of establishment for longer periods of time for a number of financial and personal reasons.

According to BGL (DE association), some Member States seem to interpret the new provision as an obligation to firms to give the option to drivers to return every 4 weeks rather than an actual obligation for drivers to return. If this is a common interpretation among enforcing authorities, the effectiveness of the provision will be diminished.

Figure 5-18: Survey responses to “On average, how often do drivers you employed in 2019 return home to spend their regular weekly rest?”



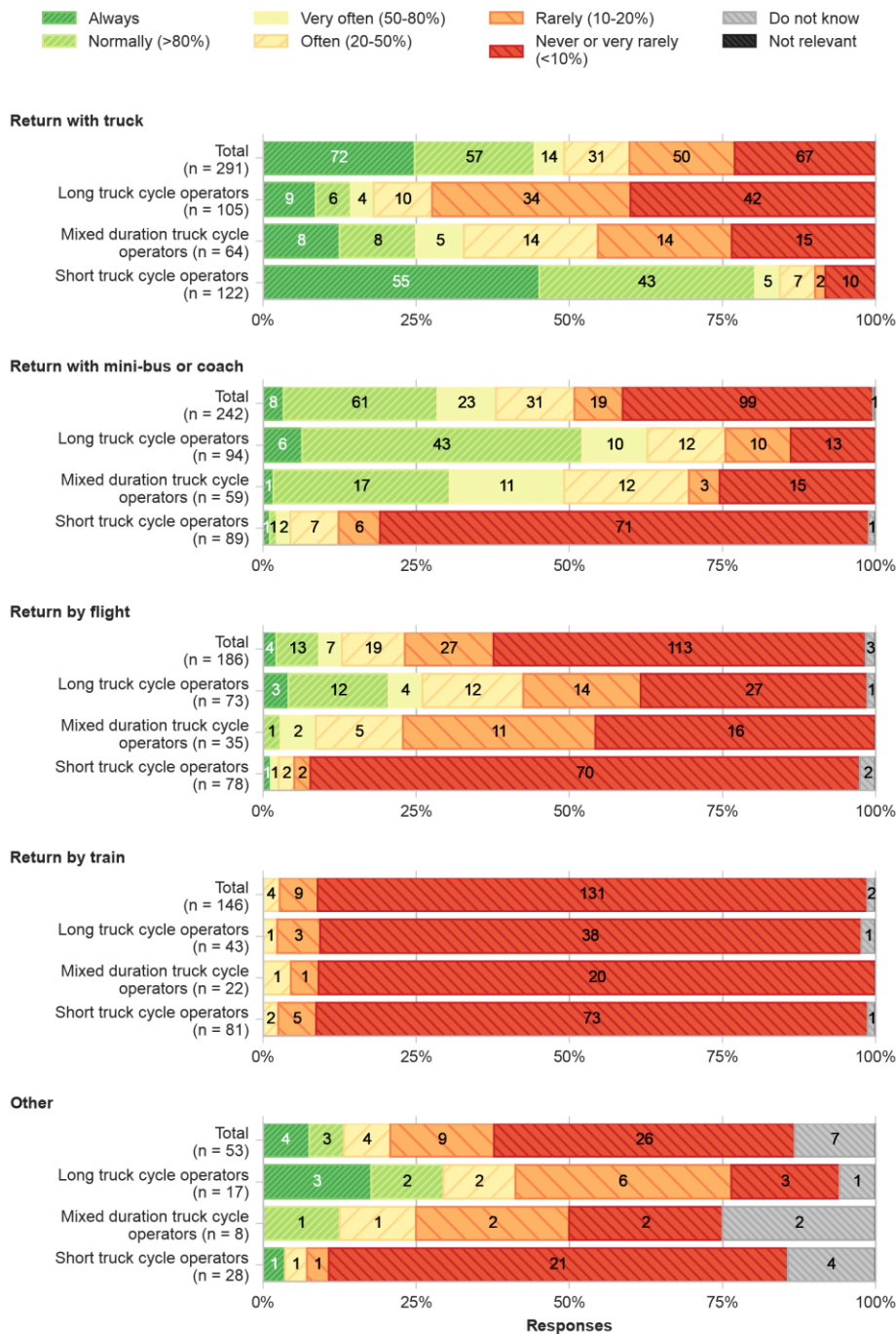
Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions, national authorities. The total responses vary as not all stakeholders provided an answer to all options.

As shown in Figure 5-19, 129 out of 291 hauliers (44%) when asked how drivers return home, responded that their drivers either ‘always’ or ‘normally’ returned home with the truck. The duration of the truck cycle is a key factor to understand whether drivers return with the truck or by other modes. In short, truck drivers typically return with the truck while some longer cycles are organised in such a way that drivers return home by other means. In response to the survey, 98 out of 122 (80%) of hauliers typically involved in short truck cycles indicated that drivers ‘always’ or ‘normally’ return with the truck, while only 16 out of 64 (25%) hauliers typically involved in long truck cycles responded so. Among those not returning by truck, minibus or coach seems to be the most common transport option. Those responding they use other modes mostly organise the return by car.

According to one Finnish haulier, larger companies involved in long truck cycles tend to organise minibuses for drivers to return home. However, in smaller companies, drivers generally return by car (either provided by the company or by the driver). As pointed out by BGL, the return with the truck is part of drivers’ working time, while the return by other transport modes is sometimes taken from drivers’ spare time. An Estonian public authority stated that after the adoption of the measure on the regular return of the driver, the number drivers returning home by truck will grow significantly.

Again, substantial differences are found between different European geographies. While in Western or Southern European countries a majority of drivers either always or normally return home with the truck, the share of those returning by truck is clearly lower in Eastern European countries.

Figure 5-19: Survey responses to “How often do these drivers use the following transport modes to return home from assignments to spend their regular weekly rest?”



Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

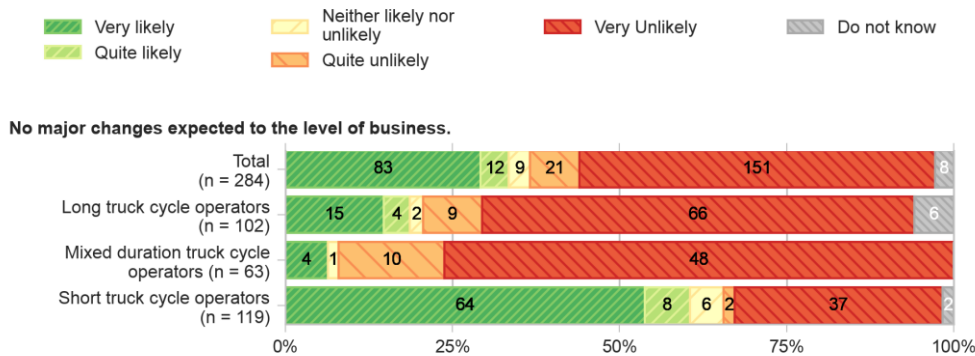
5.2 Potential impacts on road freight operations

5.2.1 Impacts on operations

In the survey, stakeholders were asked to indicate their likely response(s) to the new obligation on the regular return of the truck. For road hauliers who undertake hire and reward operations, we have split the results by those whose vehicles are typically engaged in short cycles, those whose vehicles are typically engaged in longer cycles, and those whose vehicles operate a mix of short and long cycles.

As to be expected, Figure 5-20 shows that the majority of long truck cycle operators indicated that it is very or quite unlikely that there will be no changes to the level of business (75 of 102, i.e., 74% respondents), whilst the majority of short truck cycle operators (72 of 119, i.e., 61% respondents) suggested the opposite.

Figure 5-20: Survey response to: “How likely or unlikely is it that your organisation will respond in the following ways to the new obligation on the regular return of the vehicle?” – Part 1



Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

Accordingly, Figure 5-21 shows that the majority of short truck cycle operators do not expect to respond to the provision in any other way (as they foresee no major changes to their level of business). For long truck cycle operators, the following key points can be identified:

- A majority (70 of 101, i.e., 69% of respondents) indicated that it is very or quite likely they will reduce significantly the level of business in some of the countries in which they operate (i.e., similar to Response B2 described in the main report).
- A smaller majority (55 of 102, i.e., 54% of respondents) indicated that it is very or quite likely they will relocate the operational centre to another Member State to maintain the same level of business (i.e., similar to Response B3 described in the main report).
- A large share (45 of 95, i.e., 47% of respondents) indicated that it is very or quite likely that they will retain the same vehicle capacity and accept some reduction in the level of business across all countries in which they operate (i.e., similar to Response B1 described in the main report).

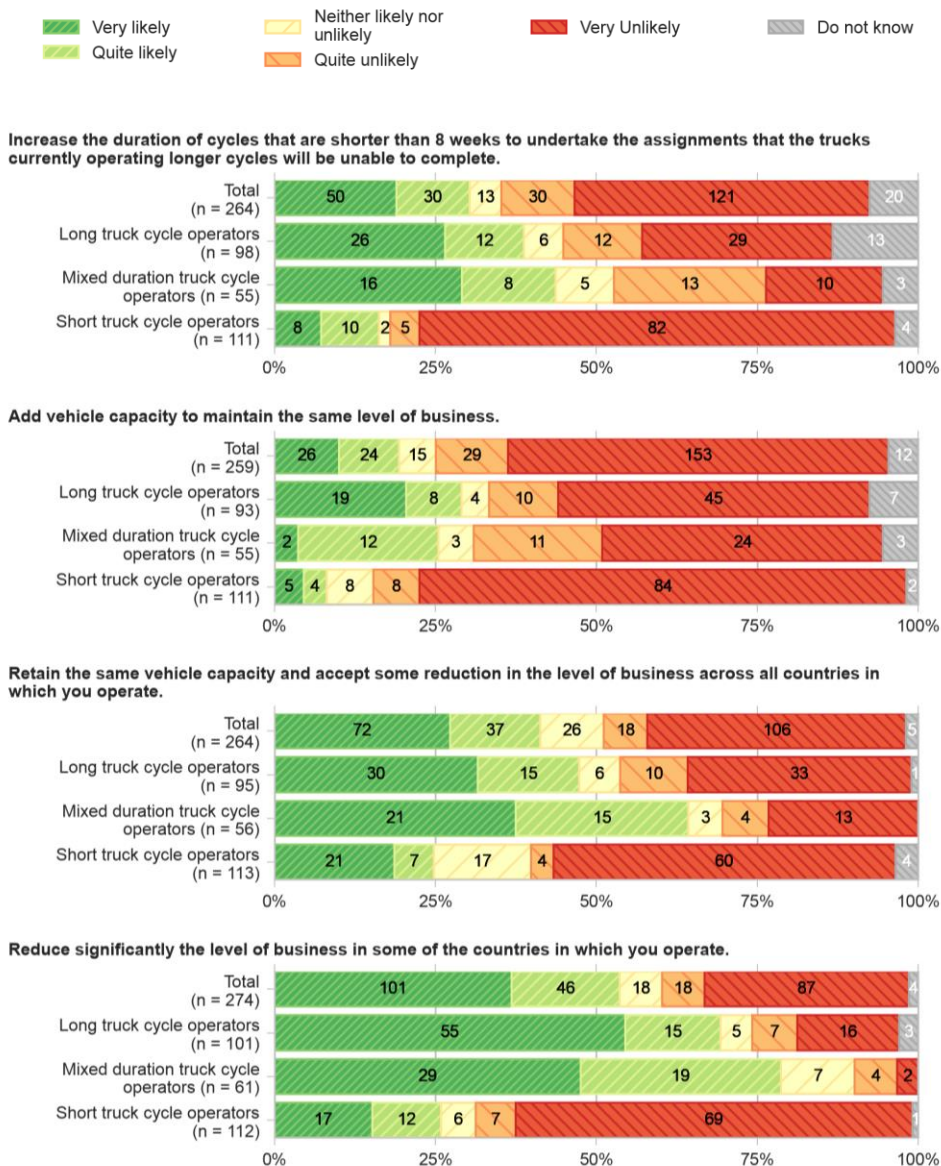
The other options gathered varying level of support from long truck cycle operators. It is worth noting that these options are not necessarily mutually exclusive and can be combined.

A closer look at the responses for the above options reveals that these are largely supported by Eastern European-based hauliers. On the other hand, only a small number of Western and Southern European hauliers indicated that they are involved in longer

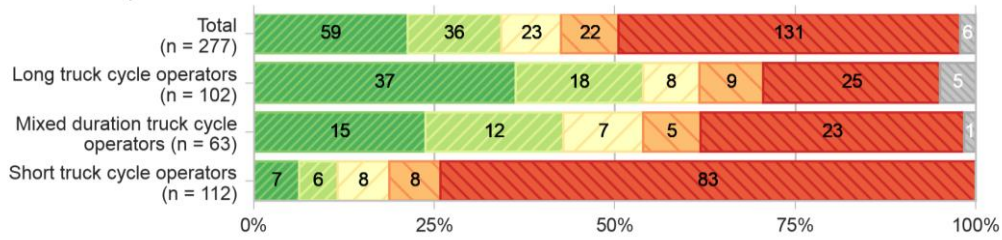
cycles. Among those, they also added that it is very or quite likely that they will add vehicle capacity to maintain the same level of business in addition to the responses identified above for all long truck cycle operators.

In their comments, one Eastern European-based haulier explained that they will relocate their operational centre since their profit margins might be very low if they keep operating from the same country due to inability to find backloads. On the other hand, another suggested that it will be cheaper to purchase additional vehicles to cover the downtime than to relocate their operational centre. In addition, four hauliers added that they will have to cease activity.

Figure 5-21: Survey response to: “How likely or unlikely is it that your organisation will respond in the following ways to the new obligation on the regular return of the vehicle?” – Part 2



Relocation of the operational centre to another Member State to maintain the same level of business.



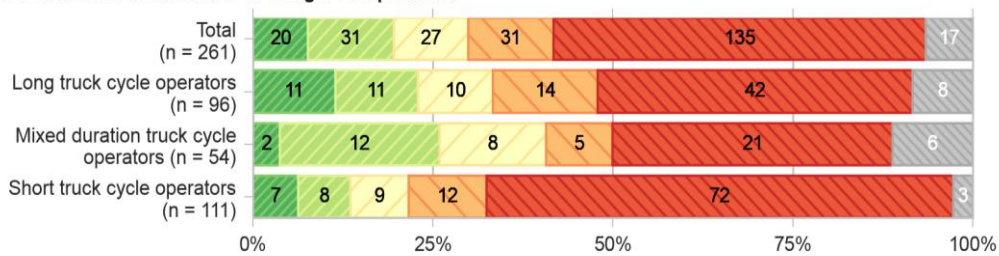
Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

Finally, Figure 5-22 shows that neither the option to collaborate or merge nor the option to relocate the operational centre within the Member State closer the border seem very or quite likely to any of these operators.

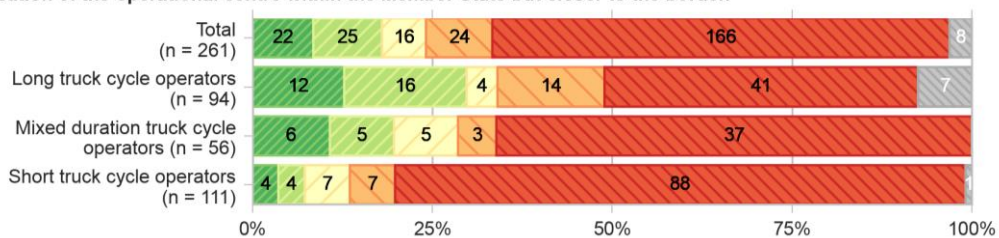
Figure 5-22: Survey response to: “How likely or unlikely is it that your organisation will respond in the following ways to the new obligation on the regular return of the vehicle?” – Part 3



Collaboration with another firm or merger / acquisition.



Relocation of the operational centre within the Member State but closer to the border.



Note: This chart only includes the responses from the surveyed hauliers conducting hire and reward operations. Short cycle operators include the hauliers whose vehicles all return six or more times per year. Long cycle operators include the hauliers whose vehicles all return less than six times per year. Mixed duration cycle operators include the hauliers with a share of vehicles that return six or more times per year and the remaining share return less than six times per year.

The responses provided by the other stakeholder groups (i.e. national industry associations, trade unions, drivers and national authorities) provide further insights into the potential responses of the affected hauliers.

Overall, the majority of stakeholders based in Eastern European countries, whose operators tend to be involved in longer cycles, suggested that it is very or quite unlikely that no major changes are expected to the level of business which is in line with the

conclusions above. There is also some varying level of agreement that operators will respond in the following five ways proposed:

- Reduce significantly the level of business in some of the countries in which they operate (i.e., similar to Response B2) - suggested by the majority of Eastern European-based drivers, authorities, trade unions and national industry associations responding.
- Relocation of the operational centre to another Member State to maintain the same level of business (i.e., similar to Response B3) – suggested by the majority of Eastern European-based drivers, authorities and trade unions responding.
- Retain the same vehicle capacity and accept some reduction in the level of business across all countries in which they operate (i.e., similar to Response B1) - suggested by the majority of Eastern European-based drivers, authorities and national industry associations responding.
- Increase the duration of cycles that are shorter than 8 weeks to undertake the assignments that the trucks currently operating longer cycles will be unable to complete (i.e., similar to Response A1) – suggested by the majority of Eastern European-based drivers, authorities and trade unions responding.
- Add vehicle capacity to maintain the same level of business (i.e., similar to Response A2) – suggested by the majority of Eastern European-based drivers, and trade unions responding.

More details on their views are presented in Text Box 5-1.

Text Box 5-1: Summary of input provided by Eastern European-based stakeholders

When asked about the potential response of hauliers to the new obligation on the regular return of the vehicle, stakeholders considered a number of options which are not necessarily mutually exclusive and could be combined. These are reported below.

On the one hand, three of five Eastern European-based unions, five of eight Eastern-European based industry associations, four of seven Eastern European authorities (EE, BG, LV, PL), and 12 of 17 drivers working for Eastern European-based hauliers indicated that it is very or quite unlikely that no major changes expected to the level of business.

On the other hand:

- Ten of 15 drivers working for Eastern-based hauliers, six of seven Eastern authorities (RO, EE, LV, PL, SI, HU), and four of five Eastern-based trade unions indicated that it is very or quite likely that there will be an increase in the duration of cycles that are shorter than 8 weeks to undertake the assignments that the trucks currently operating longer cycles will be unable to complete.
- Seven of 15 drivers working for Eastern-based hauliers and 3 of five Eastern-based unions indicated that it is very or quite likely that operators will add vehicle capacity to maintain the same level of business but four of seven Eastern industry associations noted that the same is very or quite unlikely.
- Eight of 14 drivers working for Eastern-based hauliers, four of seven Eastern-based associations, five of seven Eastern authorities (RO, EE, BG, LV, SI) indicated that it is very or quite likely that operators will retain the same vehicle capacity and accept some reduction in the level of business across all countries in which they operate.
- Nine of 16 drivers working for Eastern-based hauliers, four of seven Eastern-based associations, five of seven Eastern authorities (RO, EE, BG, LV, HU), four of five Eastern-based unions indicated that it is very or quite likely that operators will reduce significantly the level of business in some of the countries in which you operate.

- 11 of 16 drivers working for Eastern-based hauliers, four of seven Eastern-based authorities (EE, BG, LV, HU), and three of five Eastern-based unions indicated that it is very or quite likely that operators will relocate the operational centre to another Member State to maintain the same level of business.

In the comments, the Estonian International Road Carriers (ERAA) and the Estonian national authority explained that companies registered in peripheral countries will be most likely forced to close business because of the competitive advantage of central countries. The Estonian authority added that these companies might also relocate. A driver working for a Romanian haulier and another working for a Lithuanian haulier also suggested that these companies might cease activity.

The Bulgarian association AEBTRI noted that it's unclear what will happen in terms of relocation because this will be burdensome for Bulgarian hauliers, but it might be even more burdensome to remain in Bulgarian and their trucks having to return more regularly. For the Romanian trade union, there are a number of letterbox companies managed by Western hauliers but registered in Slovakia that employ Romanian drivers which will have to relocate to the Western Member States. Similarly, the Latvian and Bulgarian national authorities expect that some hauliers will relocate their operational centres to central countries or to third countries not covered by EU regulations. The Bulgarian authority also explain that the provision will reduce the level of business in some of the countries in which Bulgarian hauliers operate. In addition, the Estonian authority also indicated that

A number of unions submitting very similar or the same response (including unions from Eastern, Western and Southern Member States: PL, RO, IT, BE, ES, FR, SE, FR, AT, plus two EU14 unions which wish to remain anonymous) clarified that for companies that have an effective establishment from and to where they operate, their activity will not be impacted. If that's not the case, they explained that relocation to the Member State where these companies have a stronger presence is likely.

In addition, ten of 16 drivers working for Eastern-based hauliers, and four of seven Eastern-based associations indicated that it is very or quite unlikely that operators will relocate the operational centre within the Member State but closer to the border.

Finally, nine of 15 drivers working for Eastern-based hauliers indicated that it is very or quite unlikely that operators will collaborate with another firm or undertake mergers / acquisitions, but four of seven authorities (RO, LV, SI, HU) indicated that it is very or quite likely.

In the comments, an authority (wishing to remain anonymous) highlighted that it is difficult to judge future changes related only to this provision as the Mobility Package I will change the haulage market in its entirety. They added that the problem is not vehicle capacity but driver shortage.

In contrast, when it comes to Western European-based stakeholders, the majority of national industry associations and drivers working for Western hauliers mostly rejected the responses listed above, as expected given that the operators based in these countries are mainly undertaking shorter cycles. We note that only two responses were received from Western European authorities and one from Western European trade unions, so it was not possible to draw any general conclusions from their input. The detailed views of Western European-based stakeholders are provided in Text Box 5-2.

Text Box 5-2: Summary of input provided by Western European-based stakeholders

When asked about the potential response of hauliers to the new obligation on the regular return of the vehicle, stakeholders considered a number of options which are

not necessarily mutually exclusive and could be combined. These are reported below.

Overall, drivers and industry associations believe the following responses to be quite or very unlikely:

- Six of eight drivers working for Western-based companies, and all five industry associations indicated that it is very or quite unlikely that there will be an increase the duration of cycles that are shorter than 8 weeks to undertake the assignments that the trucks currently operating longer cycles will be unable to complete.
- Seven of eight drivers working for Western hauliers, four of five Western-based associations indicated that it is very or quite unlikely that operators will add vehicle capacity to maintain the same level of business.
- Four of five national industry associations based in Western Member States indicated that it is very or quite unlikely that operators will retain the same vehicle capacity and accept some reduction in the level of business across all countries in which they operate.
- Six of eight drivers working for Western hauliers, four of five Western-based associations, and all two authorities responding (DK, DE) indicated that it is very or quite unlikely that operators will reduce significantly the level of business in some of the countries in which they operate.
- Six of eight drivers working for Western hauliers, four of five Western-based associations, indicated that it is very or quite unlikely that operators will relocate the operational centre to another Member State to maintain the same level of business.

It is worth noting that three of five Western-based associations also believe it is very or quite unlikely that the level of business will not change.

In addition, six of eight drivers working for Western hauliers, four of five Western-based associations indicated that it is very or quite unlikely that operators will relocate the operational centre within the Member State but closer to the border.

Finally, six of eight drivers working for Western hauliers, and four of five Western-based associations indicated that it is very or quite unlikely that operators will collaborate with another firm or undertake mergers / acquisitions.

In their comments, the Danish authority noted that they do not think that the Danish transport undertakings will reduce the level of business in the countries in which they operate but that to be able to maintain it they will need to use their vehicle capacity appropriately and might collaborate with other companies. They added that Danish transport undertakings are likely to remain in Denmark because the country is somewhat central and there would be little gain from relocation. They are also not likely to relocate within Denmark closer to the borders due to the small size of the country.

The input provided by Southern European-based stakeholders is more limited and only some observations can be made with regards to the views of the responding national authorities. The majority of authorities think it is very or quite unlikely that the level of business will not change and believe that it is very or quite likely that operators will relocate the operational centre to another Member State to maintain the same level of business. More details on their views are included in Text Box 5-3.

Text Box 5-3: Summary of input provided by Southern-based stakeholders

When asked about the potential response of hauliers to the new obligation on the regular return of the vehicle, stakeholders considered a number of options which are not necessarily mutually exclusive and could be combined. These are reported below.

Input provided by Southern-based stakeholders is more limited, but the following can be observed:

- Three of four Southern authorities responding (ES, CY, MT) believe it is very or quite unlikely that the level of business will not change.
- Three of four Southern authorities (CY, ES, MT) indicated that it is very or quite likely that operators will relocate the operational centre to another Member State to maintain the same level of business.
- Three of four Southern authorities (IT, ES, MT) indicated that it is very or quite likely that operators will collaborate with another firm or undertake mergers / acquisitions.

In their comments, the Maltese authority explained that this measure means that trucks in the current fleet operating in Europe would be redundant for around 11% of their time (while trucks are ferried to and from Malta on the RoRo ships). As a result, they expect an increase in the available fleet to compensate for this loss in capacity which would, in turn, result in a range of responses, such as larger hauliers adding new vehicles and smaller operators giving up their haulage activity. They also do not expect these issues to attract non-Maltese hauliers as this is already a possibility but no such hauliers operate these services (possibly due to the issues around the sea leg of the journey and related delays and costs).

The Spanish authority added that, for operators whose vehicles already return within eight weeks, their activity will not be affected at all.

One authority (wishing to remain anonymous) suggested that undertaking might change their logistic organisation and those which are not established in their country might change their pricing policy to secure cargo on return journeys.

In addition, similar to the conclusion above based on the hauliers' responses, the majority of drivers working for both Eastern and Western European hauliers and associations representing both Eastern and Western hauliers do not think operators will relocate the operational centre within the Member State closer to the border. This is in line with the expectation that operational centres for operators active predominantly in international transport are already typically close to borders anyways.

Finally, the majority of drivers working for both Eastern and Western European hauliers and the majority of Western-based associations responding indicated that it is very or quite unlikely that operators will collaborate with another firm or undertake mergers / acquisitions. On the other hand, the majority of Southern authorities believe this is very or quite likely.

Change in type of operations

Hauliers carrying out hire and reward operations were asked to indicate how the type of international operations they carry out might change. As shown in Figure 5-23, those hauliers carrying out truck cycles of less than 8 weeks only were less likely to report a significant decrease in operations across the board than those carrying out truck cycles of longer than 8 weeks. This trend occurs across all the different types of operations but it is long haul cross trade that the highest proportion of long and mixed truck cycle hauliers anticipate seeing a decrease of some kind in their activities (74 out of 101, equivalent to 73% and 43 out of 61, equivalent to 70% respectively). Short truck cycle hauliers were also more likely to expect a decrease in long haul cross trade operations compared to other operations, but this is still a much lower proportion than for long truck cycles (at only 23 out of 111, equivalent to 21%).

When looking at the results split by geographical cluster (as per Figure 5-24), it is clear that the expected decrease in operations is primarily reported by Eastern European hauliers across all types of operation. This is not countered with an expected increase in operations by Western and Southern European hauliers suggesting there may be wider

impacts on the market as a whole. Again, these results may be related to the higher proportion of Eastern European hauliers from peripheral countries responding to the survey.

Figure 5-23: Survey responses to “Thinking about the operations your organisation currently undertakes, how do you think these could be affected by the new obligation on the return of the vehicle?” Part 1 – split by truck cycle

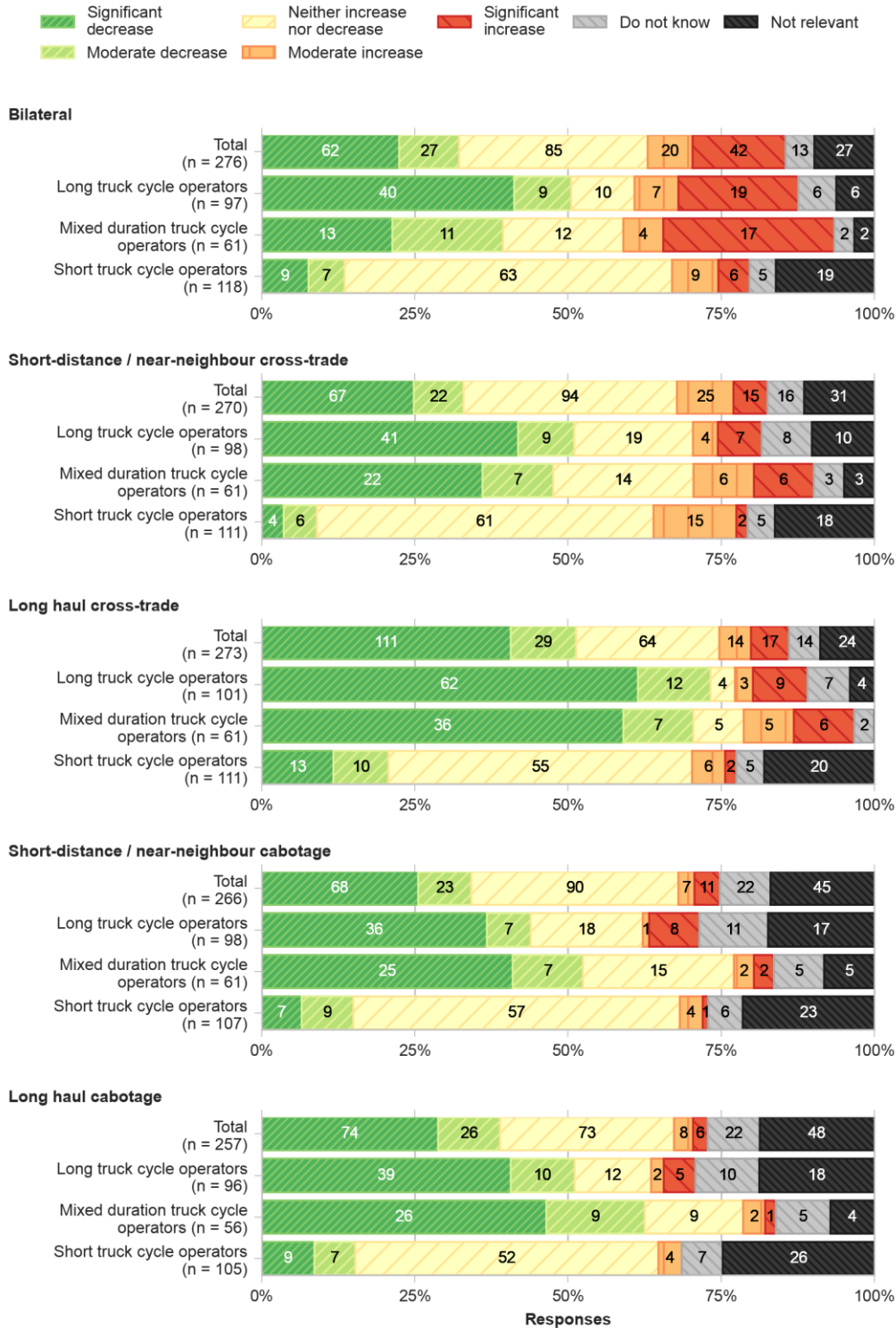
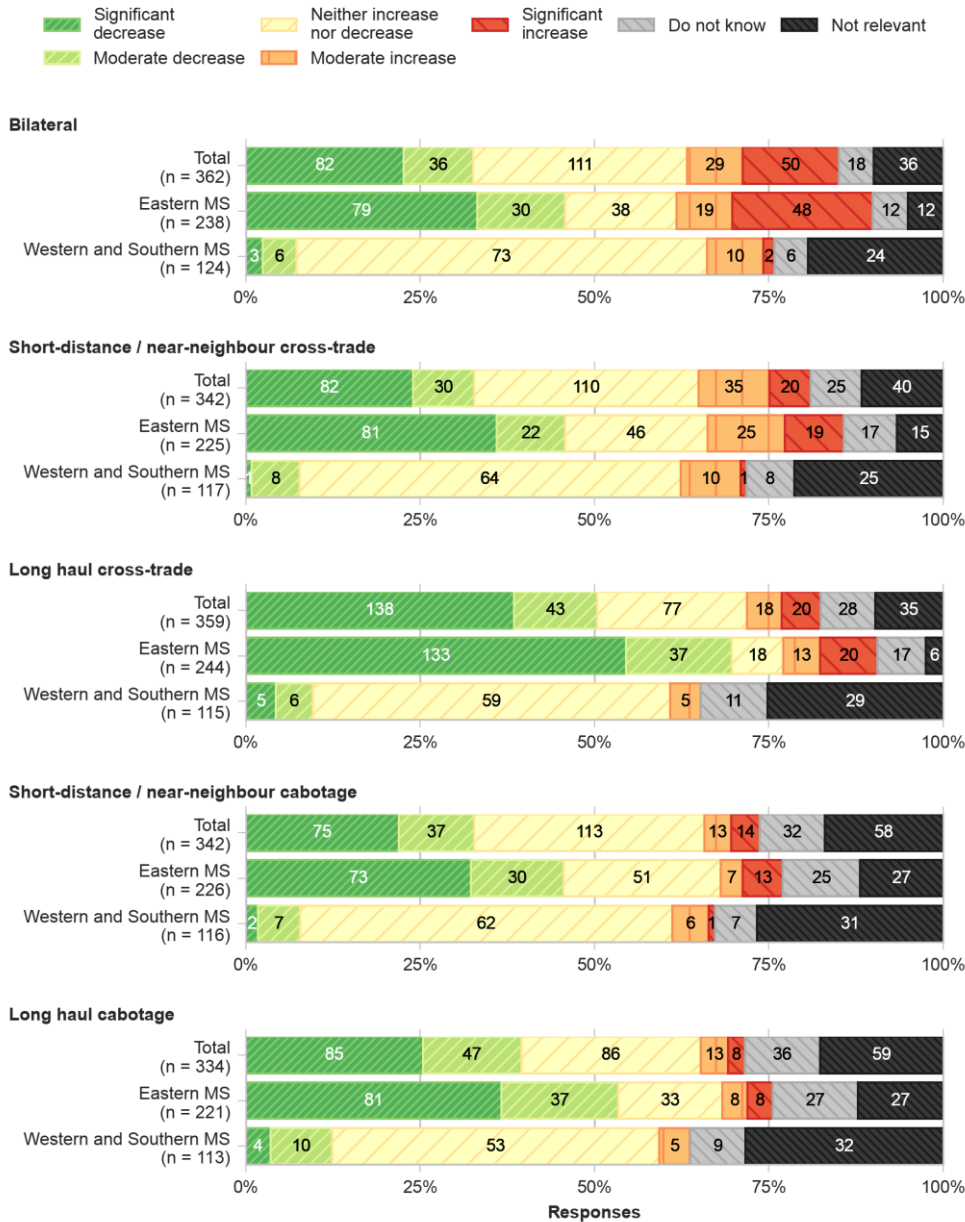


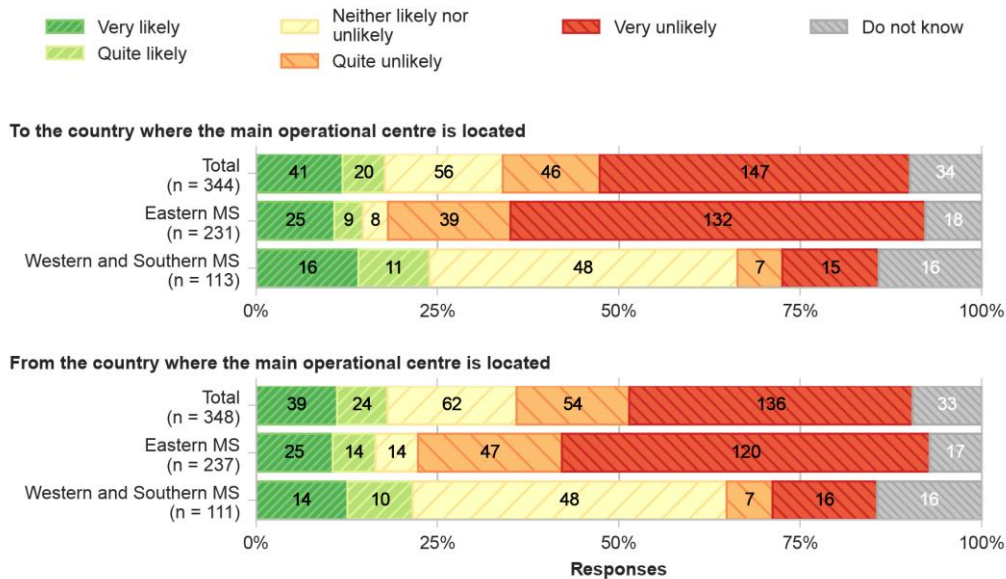
Figure 5-24: Survey responses to “Thinking about the operations your organisation currently undertakes, how do you think these could be affected by the new obligation on the return of the vehicle?” Part 2 – split by geographical cluster



Capacity to source a load following the new obligation entering into force

Stakeholder input from the exploratory interviews suggested that it might be difficult for operators to find cargo to transport in the return journeys and this will depend on supply and demand. However, the stakeholders’ views provided during the main consultation presented in Figure 5-25 show that, while the majority of Eastern Member States think that finding additional loads is very unlikely to and from the operational centre (132 of 231 and 120 of 237 respondents, respectively), Western and Southern Member States mostly responded that it is ‘neither likely nor unlikely’ (48 of 113 and 48 of 111 respondents, respectively).

Figure 5-25: Survey responses to “How likely or unlikely would it be to secure a load for the potential additional journeys (both the journey to the operational centre and the journey from this location) arising from this new requirement?”

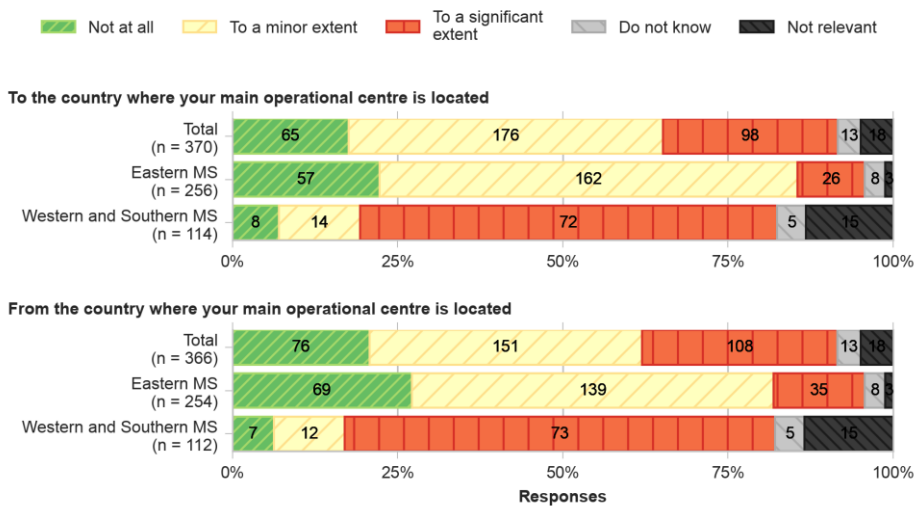


Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

As part of the consultation for this study, stakeholders were also asked about the factors that might affect their capacity to secure a load for those additional journeys to and from the country of operation with a reasonable profit. Overall, their responses are similar to those analysed in the earlier section 5.1.4.

Regarding the existence of market opportunities to find cargo to be transported from/to the country where the operational centre is located (Figure 5-26), Western and Southern European Member State responses show that the majority identified they expect to be able to find opportunities to a significant extent for journeys to (72 of 114 respondents) and from (73 of 112 respondents) their operational centre. However, Eastern European Member States, whose operators are likely to be involved in longer cycles and thus will be most affected by the provision, suggest they might not be able to secure additional loads as there are limited market opportunities to (162 of 256 respondents) and from (239 of 254 respondents) their operational centres.

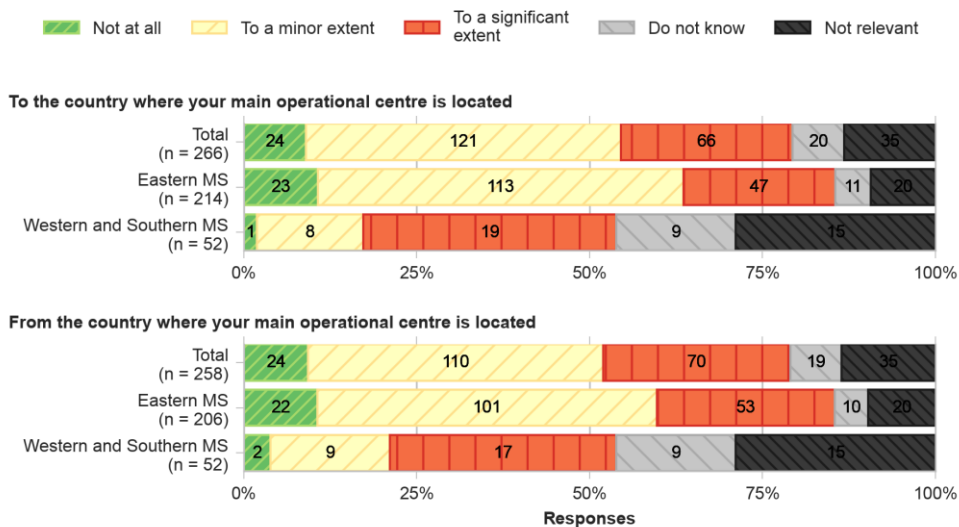
Figure 5-26: Survey responses to “To what extent are there market opportunities to find cargo to be transported from/to the country where your main operational centre is located?”



Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

Survey responses which highlight the ability to get information that leads to securing loads for journeys to and from the operational centre are presented within Figure 5-27 and suggest that the lack of information is a contributing factor to Eastern European Member States being unable to secure loads. As before, Western and Southern European Member States most common response was ‘To a significant extent’, which suggests most respondents are able to get information regarding loads to (19 of 52) and from (17 of 52) the operational centre. Conversely, the majority of Eastern member states responded with ‘To a minor extent’ to source information on loads to (113 of 214) and from (101 of 206) the operational centre.

Figure 5-27: Survey responses to “To what extent are you able to find information about these opportunities?”



Note: Responses from all stakeholders that indicated their Member State have been included in this chart. The stakeholder groups covered by the consultation are: companies engaged in the provision of road freight transport services (e.g. haulier, freight forwarder, logistic provider) and their associations, drivers of vehicles engaged in road freight transport and their trade unions. The total responses vary as not all stakeholders provided an answer to all options.

In the comments received via the survey and interviews, stakeholders elaborated further on factors affecting the capacity to secure loads for additional journeys to and from the operational centre. Factors given are:

- Trade imbalance between the haulier's Member State and operational centre was given, i.e., not enough exports to the haulier's Member State – suggested by a DE haulier.
- Procurement of additional trucks to maintain current levels of service, as there will be a greater frequency of truck returns. This will result in less trucks available in the operational centre Member State – suggested by Estonian International Road Carriers (ERRA).
- Trucks will collect trailers from Member States where operational centres are based in. As such, trailers would need to be procured to secure loads to and from the operational centre – suggested by ERRA.

These stakeholders were also asked to provide their views on how the obligation for the regular return of the vehicle would affect international freight rate compared to the current average. Responses on potential effects of the measure include:

- This will decrease freight rates as there will be more return journeys, increasing competition and therefore driving down prices – suggested by ERRA.
- A desire for the return journey to be laden might lead to hauliers accepting lower rates – suggested by an EE authority.
- That increased capital expenditure will be passed onto the client, which will result in higher costs of goods – suggested by Transport Malta.

5.2.2 Economic and social impacts

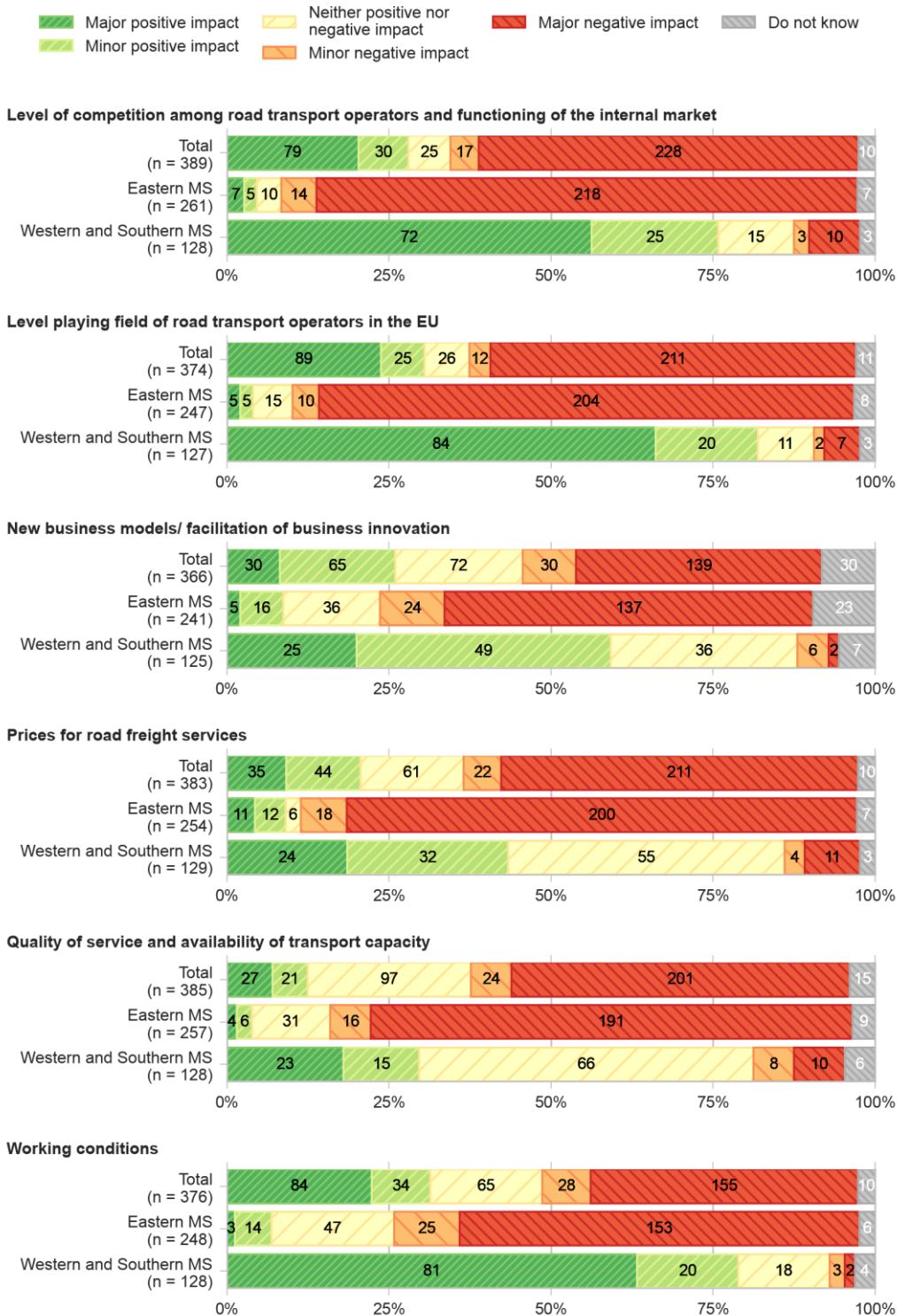
In the surveys, stakeholders were asked to rate the impact of the measure on different aspects of the road haulage market as presented in Figure 5-28. The views of stakeholders regarding potential impacts on market prices and quality of service largely vary between those based in Eastern European countries and those established in Western or Southern European Member States. Stakeholder from Western and Southern European Member States tend to see no impact or, if any, a positive impact on both prices and quality of service. In contrast, a large majority of stakeholders from Eastern Member States (200 out of 254) expect a major negative impact on prices and a similar proportion (191 out of 257) believe the impact on quality of service will be clearly negative. The position of stakeholders regarding the direction of those impacts is clearly influenced by their market interests.

The views of stakeholders regarding potential impacts on various aspects of the functioning of the internal market also vary substantially between those based in Eastern European countries and those established in Western or Southern European Member States.

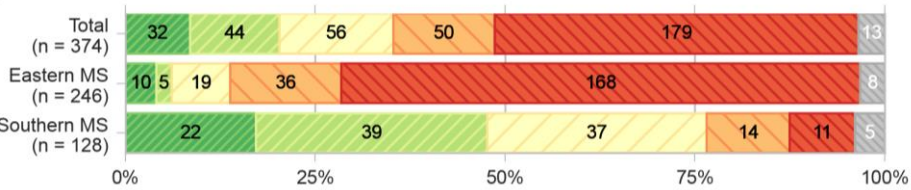
Stakeholders from Western and Southern European Member States tend to see a major positive impact on the level of competition (72 out of 128) and the level playing field (84 out of 127). Regarding the facilitation of business innovation, most stakeholders see no impact (36 out of 125) or a minor positive impact (49 out of 125).

In contrast, a large majority of stakeholders from Eastern European Member States (218 out of 254) expect a major negative impact on the level of competition and a similar proportion (204 out of 247) believe the impact on the level playing field would be clearly negative. While still a majority of stakeholders in Eastern MS see major negative impact on business innovation (137 out of 241), a significant proportion (36 out of 241) states that there would not be any impact.

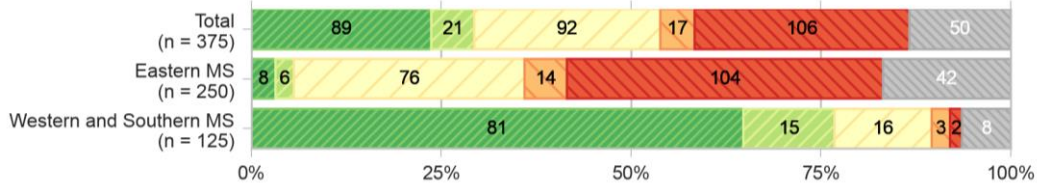
Figure 5-28: Survey responses to: “To what extent do you consider this measure could have an impact on the following aspects?”



Driver shortage



Level of social dumping*

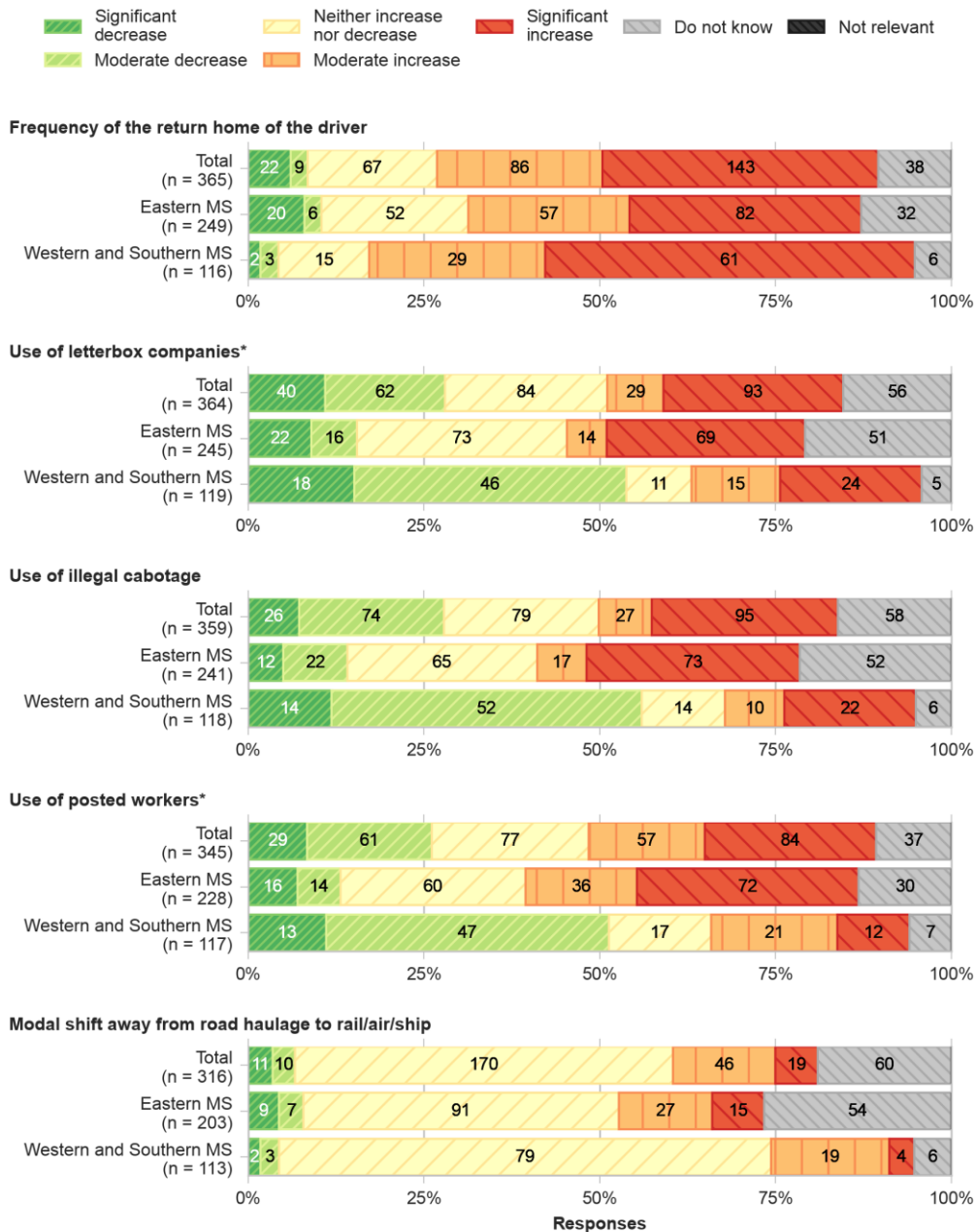


Respondents were also asked to estimate the level of impact on a number of other social aspects, with results presented in Figure 5-29. There was a general trend across all geographical clusters that the frequency of the return home of the driver would either moderately or significantly increase. This was felt slightly more by Western and Southern European stakeholders (90 out of 116, 78%) compared to Eastern European stakeholders (139 out of 249, 56%).

Views on the impacts on use of letterbox companies, illegal cabotage and posted workers differed between Eastern European stakeholders and Western European stakeholders, with Eastern European stakeholders generally expecting that there will be some level of increase in these activities, whereas Western and Southern European stakeholders generally expecting a decrease to a moderate or significant extent.

Over half of the respondents (170 out of 316) did not expect an impact in terms of modal shift. In this case, there appears to be no significant difference between responses from Eastern and Western European hauliers.

Figure 5-29: Survey responses to: "How do you expect the following aspects of the market to change as a result of the implementation of the measure?"

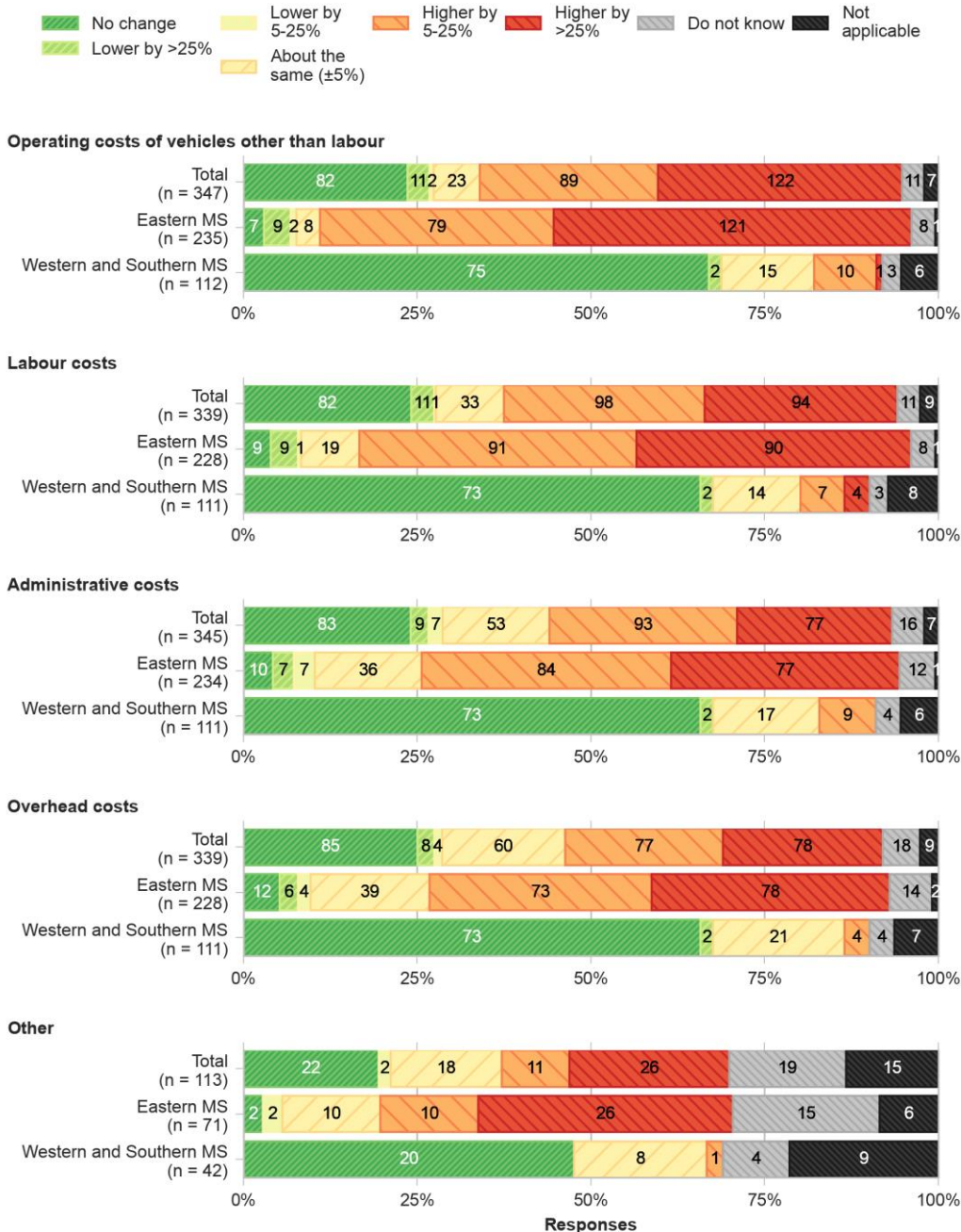


Impact on ongoing costs

Responses to the stakeholder survey suggest that the measure is likely to lead to increased annual ongoing costs for the road haulage market as a whole. However, the position of the operators very much depends on the Member State cluster. While a majority of hauliers in the Western and Southern European Member States do not expect cost changes in any of the different cost categories, a large proportion of hauliers from Eastern European countries expect significant cost increases across all cost categories. Respondents from Eastern European Member States suggest that operating costs of vehicles (these would be costs of additional journeys in the simple market compliance scenario or increased labour costs for drivers as a result of relocation) are more likely to be increased significantly (over 25%). The proportion of those agreeing that administrative or other overhead costs (these would be essentially related to the

relocation process in the partial or high market restructuring scenario) would increase by more than 25% is somewhat lower.

Figure 5-30: Survey responses to: "What do you expect to be the impact of this measure on the annual operating costs for your organisation (in relation to the current costs)?"

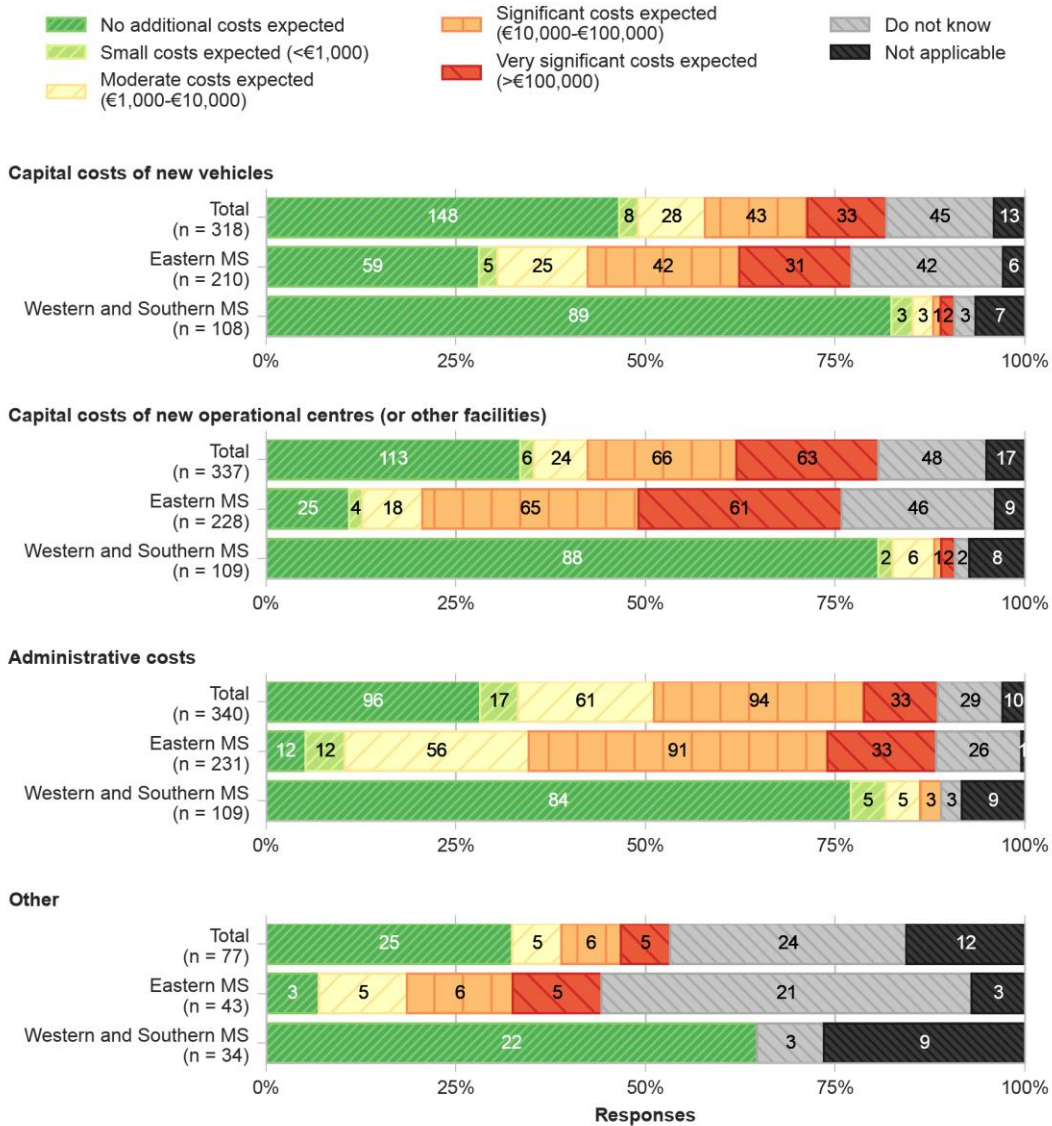


Impact on one-off costs

According to responses to the survey, the application of the measure would imply one-off compliance costs for the industry as a whole. However, while Western and Southern European hauliers tend not to expect additional one-off costs, hauliers from Eastern European countries state that they would incur one-off costs associated to capital costs of new vehicles (related to additional journeys in the simple market compliance scenario), new operational centres or other facilities and administrative costs (related to the relocation process in the partial or high market restructuring scenario). The proportion of Eastern European hauliers not expecting increased capital costs of new vehicles (59 out of 210) is substantially higher compared to other cost categories; only 25 out of 228 do

not expect capital costs related to new facilities and 12 out of 231 believe there would not be additional one-off administrative costs. The results from the survey seem to suggest that capital costs of new operational centres are those more likely to be very significant (above €100k).

Figure 5-31: Survey responses to "Do you expect any additional one-off costs as a result of the implementation of this measure?"



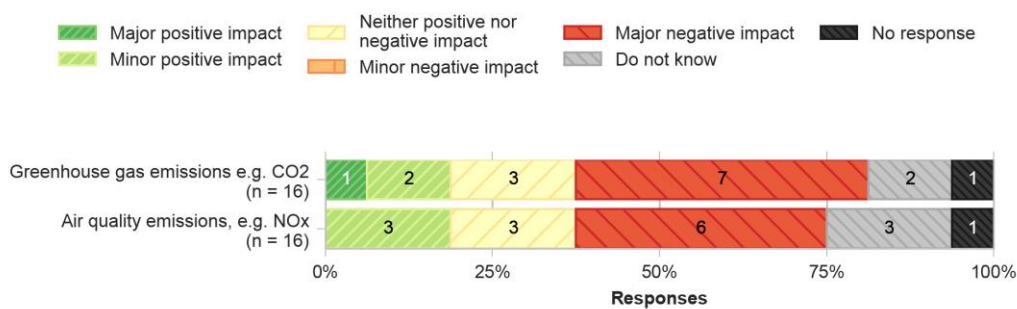
Capacity to pass on costs to customers

When asked about the capacity of hauliers to pass-through additional costs to their customers, consulted stakeholders have diverging views. Western European hauliers (or their associations) tend to believe that costs would be fully passed-through, while Eastern and Southern European hauliers generally argue that they will have to absorb these additional costs. The German haulier association BGL argues that while profit margins for Western European hauliers are up to 1%, profitability could be higher for Eastern European hauliers undertaking international operations because of their lower cost base. In this sense, Eastern European hauliers may be more likely to absorb additional costs. The Romanian hauliers' association UNTRR stated that Romanian companies will be more impacted than other competitors and will not be able to increase the tariffs in a proportional way to cover the costs.

5.2.3 Environmental impacts

National authorities were asked to provide feedback on the potential environmental impacts of the new measure. As shown in Figure 5-32, a high proportion of respondents consider there will be some kind of negative impact on both greenhouse gas emissions (7 out of 16, of which five are from Eastern European Member States and two from Southern European Member States) and air quality (6 out of 16, of which four are from Eastern European Member States and two from Southern European Member States). Of those who indicated there would be other impacts, noise pollution from infrastructure was mentioned by the LV authorities and increased emissions from ships needing to carry trucks back to the island at the expense of other cargo was described by Transport Malta (MT).

Figure 5-32: Survey responses to: "To what extent do you consider this measure could have an impact on the following aspects?"



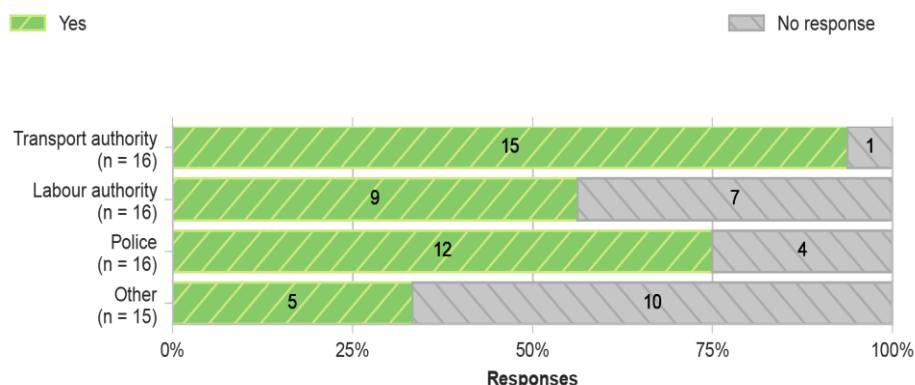
5.3 Implications for monitoring and enforcement practices

In addition to general questions on the potential impacts of the market, national authorities were also asked about the implications of the new measure on their monitoring and enforcement practices. These impacts are summarised in the following sections.

5.3.1 Current monitoring and enforcement practices

In their survey, national authorities were asked to indicate which departments or authorities are involved in the monitoring and enforcement of the current Regulations (Regulation (EC) No 1071/2009 and Regulation (EC) No 1072/2009). Responses as shown in Figure 5-33, indicate that the transport authority is most commonly involved with support coming from the police in 12 out of 16 cases and the labour authority in 9 out of 16 cases.

Figure 5-33. Authorities involved in monitoring and enforcement of standards in road haulage according to respondents



With respect to other authorities identified, stakeholders also listed the following:

- Estonian Association of International Road Carriers (EE)
- National Tax and Customs Administration (HU)
- Individual authorities in the federal states (DE)
- Road Safety Authority (IE)

When asked to provide more details on the monitoring and enforcement practices in their Member State, national authorities indicated specified that the relevant transport authority monitors licences and that police or border forces perform roadside checks. Some respondents specified that an additional agency supports with monitoring and enforcement, for example, in Ireland, it is the Road Safety Authority that is responsible for roadside checks and premises inspections as the enforcement authority, while in Hungary, the Tax and Customs Agency that holds a key role in licensing.

The number of different actors involved in the monitoring and enforcement procedures varied across the different Member States.

5.3.2 Impacts of the measure on monitoring and enforcement practices

When asked how they expect monitoring and enforcement practices to be affected, six of the 16 national authorities responded 'significantly affected' while seven felt they would be 'slightly affected' and three did not think they would be affected at all. There was no difference by geographical location.

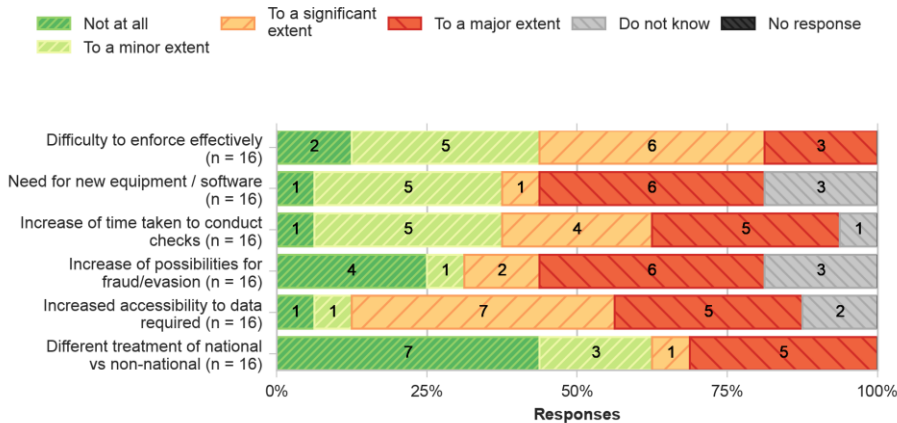
Looking at the explanations of how stakeholders felt they would be impacted; a number of themes can be identified:

- A lack of clarity around the definitions used in the new measure, creating confusing and uncertainty with respect to the application of the obligation (BG, HU, LV);
- Additional time and resources required to monitor and enforce due to a change in the process (BG, DK, EE, HU);
- New procedures required (IE, FR, MT, PL); and
- Minimal impacts in instances where smart tachographs and automatic tracking systems and software are already in place to assist monitoring and enforcement (ES).

This is supported by those responses provided to the survey question on possible problems with practical enforcement, in which most national authorities reported expecting issues across most of the aspects presented (see Figure 5-34). Increased accessibility to data required was anticipated to be the greatest issue, with 12 out of the 16 authorities expecting this to be a problem to a significant or major extent. Views on whether the treatment of national against non-national operators would differ were mixed, with seven out of the 16 authorities expecting no difference, while six felt this would be a significant or major problem (BG, CY, EE, HU, PL and RO).

Most national authorities provided mixed responses on the questions presented below, however the DE authority responded 'not at all' across the board, indicating that they do not expect any impact in any part of their activities, while the EE and PL authorities had the opposing view, responding 'to a major extent' to all the options.

Figure 5-34: Survey responses to: "Do you foresee any possible problems with the practical enforcement of the suggested measure?"



Comments describing the problems and providing possible solutions were similar to those presented on the previous page. Additional resourcing requirement and associated costs was identified (BG, EE, IT), with five authorities noting that improvement to technology and new equipment is needed to facilitate monitoring and enforcement of the new obligation (ES, HU, IE, IT, LV, and MT).

When asked whether there are any other developments which might impact on monitoring and enforcement of this provision, four of the 16 national authorities responded positively (BG, FR, MT and PL). Of these, FR proposed wider digitalisation of control, while MT said this would depend on the technology used. BG did not specify, and PL expressed doubt regarding the potential of the obligation to be implemented.

5.4 Impact of recent events on the sector

The targeted consultation explored the views of stakeholders with respect to there being any potential longer term impacts of COVID-19 and Brexit, both of which are impacting the road haulage market in 2020.

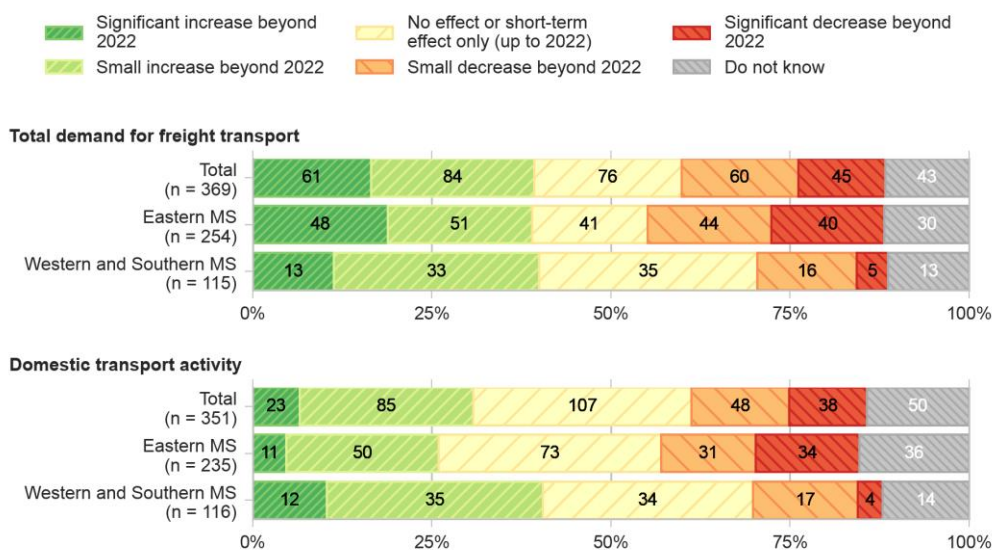
5.4.1 Effects on the market as a result of the COVID-19 pandemic

Overall, the interviews indicated that stakeholders are mostly uncertain about what the longer term impacts of COVID-19 will be (post 2022). A number of themes can be identified from the responses, notably, the economic and practical difficulties it has created for the road haulage market in 2020. This makes it difficult for the organisations to plan ahead or to understand what the market will look like in 2022. In the short term it was noted that the pandemic has had a negative impact on market prices (BGL, DE association) but while some market segments saw significant declines, for example related to the transport of goods for the hospitality market (e.g. hotels, restaurants), other segments have picked up as a result of increased demand associated with the national lockdowns across Europe (Union of International Hauliers, BG association; and TLN, NL association).

Looking forwards, a number of stakeholders mentioned the risk of an economic downturn in the years following the COVID-19 pandemic which would be a problem for the transport sector as a whole (TLN), in particular for those companies requiring financial support from banks to support renewal of their vehicles or those looking to relocate their business (LV national authorities). The Danish Transport and Logistics Association (DTL) also mentioned the pressure on the transport sector to make climate investments which may be hindered if financial support from banks is not available to help them invest in new technologies, due to a recession.

In the surveys, stakeholders were invited to rate the impact of COVID-19 on a range of different market factors, as presented in Figure 5-35 and described below.

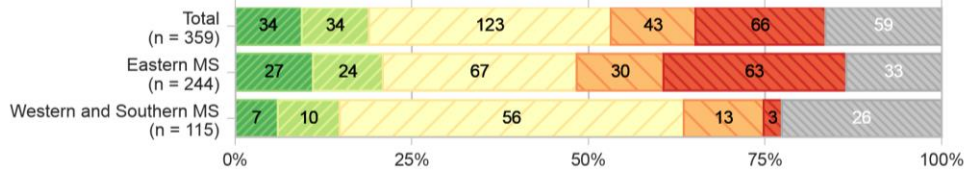
Figure 5-35: Survey responses to: “How do you expect the COVID-19 pandemic to affect the following aspects of European road freight transport beyond 2022?”



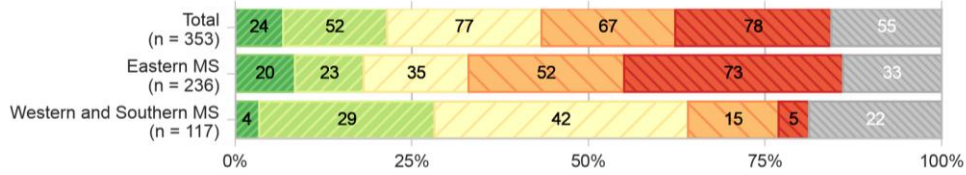
International transport activity



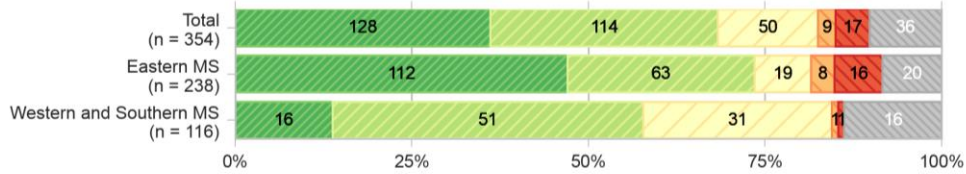
Duration of truck cycles



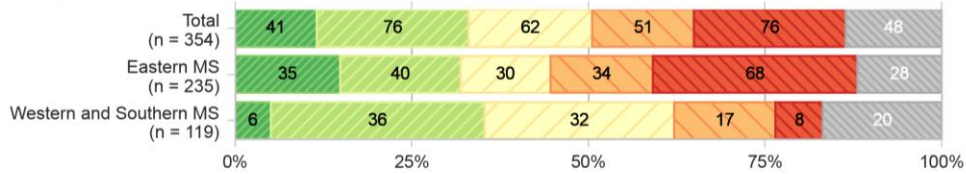
Size of enterprises



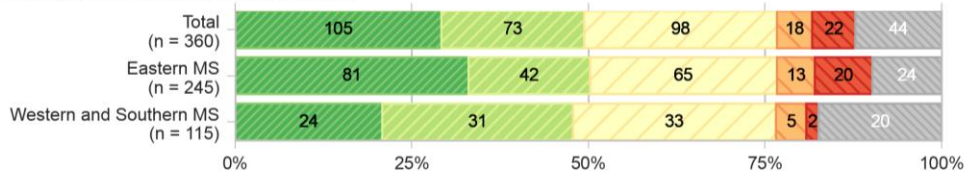
Operating costs per vehicle



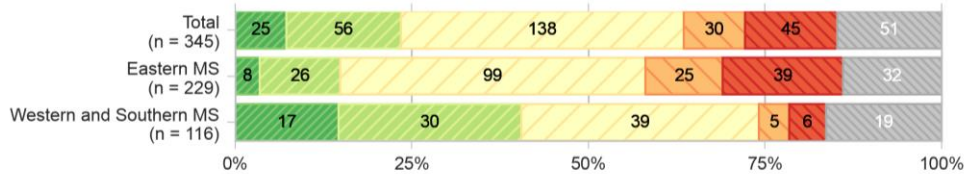
Market prices



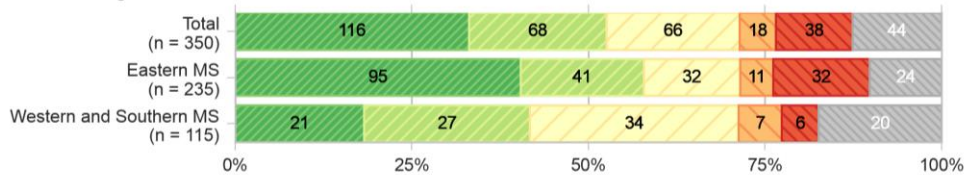
Frequency of the return home of the driver



Drivers working conditions



Drivers shortage



Responses

Total demand for freight transport

Respondents were more likely to answer that there will be some level of increase in freight transport than a decrease. There was no real difference between the proportions of stakeholders who gave this response between the Eastern European Member States (99 out of 254, 39%) and the Western and Southern European Member States (46 out of 115, 40%). While slightly more Western and Southern European stakeholders felt there would be no longer term effect (35 out of 115, 30%), slightly more Eastern European stakeholders (84 out of 254, 33%) considered that there would be a decrease in activity of some kind.

Domestic transport activity

Overall, most respondents felt that domestic transport activity would not be negatively impacted longer term as a result of COVID-19. A higher proportion of Western and Southern European stakeholders felt that domestic transport activity may increase to some extent (47 out of 116, 41%) compared to Eastern European stakeholders (61 out of 235, 26%). Eastern European stakeholders were more likely to respond that there will be a decrease in their domestic activity (65 out of 235, 28%) than Western and Southern European stakeholders (21 out of 116, 18%).

International transport activity

With respect to international transport activity, the most common response amongst Eastern European stakeholders was a decrease in activity (by 93 out of 237, 39%), although 83 out of 237 (equivalent to 35%) instead noted they anticipate an increase. Western and Southern European stakeholders were more likely to give a positive or neutral response (42 and 34 out of 113, equivalent to 37% and 30% respectively).

Duration of truck cycles

It is shown that a large share of stakeholders suggested that they do not expect any effects or only expect short-term effects on the duration of truck cycles (123 of 359, i.e., 34% stakeholders); the remaining responses are split between an expected increase and decrease in the duration of truck cycles, with a slightly larger number of stakeholders suggesting a decrease. This is largely due to an important number of responses from Eastern European stakeholders which indicated that there could be a small or significant decrease (93 of 244, i.e., 38% stakeholders). It is possible however that these stakeholders, which seem to operate longer truck cycles, were also considering the upcoming obligation on the regular return of the vehicle which will enter into force in 2022.

Size of enterprises

Views on the size of enterprises differed between Eastern European and Western and Southern European Member States. Eastern European stakeholders tend to expect that the size of businesses will decrease to some extent (125 out of 236, 53%), while Western and Southern European stakeholders tend to suggest that there will either be no change (42 out of 117, i.e. 36%) or an increase in size of enterprises in those Member States (33 out of 117, i.e. 28%).

Operating costs per vehicle

There was less of a difference between the geographical Member State clusters when it comes to operating costs per vehicle, with the majority of respondents anticipating an increase in costs (242 out of 354, equivalent to 68%). Eastern European stakeholders were more likely to see the increase as significant (112 out of 238, i.e. 47%, compared to 16 out of 116, i.e. 14% of Western and Southern European Member States) whereas Western and Southern European stakeholders were more likely to expect the increase to be small (51 out of 116, i.e. 44%, compared to 63 out of 238, i.e. 26% of Eastern European stakeholders).

Market prices

Overall, there was a mix of responses when respondents were asked if market prices would be affected by COVID-19. Eastern European Member States were more likely than Western and Southern European Member States to agree that there would be a decrease in market prices (102 out of 235, or 43% versus 25 out of 119, or 21%). The proportion of respondents answering that prices will increase was similar across the different geographical clusters with 42 out of 119, equivalent to 35% and 75 out of 235, equivalent to 32% giving this response from the Western and Southern, and the Eastern European Member States respectively. This suggests that Eastern European organisations could view themselves as more vulnerable to the economic impacts of the pandemic.

Frequency of the return home of the driver

There was a general consensus across the stakeholders that the frequency of the return home of the driver will see some level of increase (176 out of 360, 48%), with no significant between the different geographical clusters. Of the remaining responses, only 40 out of the 360, 11% felt there would be a reduction in the frequency of trips home by the driver. The majority of these were from Eastern European stakeholders, suggesting that companies in these Member States may have change their business operations by 2022. It is likely that stakeholders had the impact of the obligation in mind as well as COVID-19.

Drivers' working conditions

The most common response relating to drivers' working conditions was that they would not be affected (138 out of 345, i.e. 40%). There was a slight difference in views between Eastern and Western and Southern European stakeholders, with a slightly higher proportion of the remaining Eastern European stakeholders responding that conditions would decrease (64 out of 229, 28%) whereas a higher proportion of the remaining Western and Southern European stakeholders felt that conditions would increase (47 out of 116, 40%).

Driver shortage

With respect to the shortage of drivers facing the industry at present, overall stakeholders felt that COVID-19 is more likely make the problem worse, but this was expected more so by Eastern European stakeholder (136 out of 235, equivalent to 58%) than Western and Southern Member States (48 out of 115, equivalent to 42%). However, again respondents could be answering this question with the new measure and the impacts of that in mind.

5.4.2 Effects on the market as a result of Brexit

The surveys and interviews gave respondents the option to provide comments on the potential impacts of Brexit on the road haulage market beyond 2022. Those respondents who provided comments (111 responses), were mostly neutral or only slightly concerned about the impacts of Brexit. Of the 111 respondents, just over half of respondents believed that Brexit would have an effect on the road haulage market beyond 2022, although answers varied in severity. 22 of these respondents believed that the effects would be minor whereas the remaining 40 of these respondents believed that there would be larger problems at risk of a Brexit, especially on the potential of a hard border. Common themes were an increase in waiting times at the UK border due to a customs increase, too few CEMT (Conférence Européenne des Ministres des Transports / European Conference of Transport Ministers) licenses if community licences do not cover the UK, heightened administration. A Bulgarian company believed there would be increased downtime in this area which would increase operating costs and consequently freight costs.

The rest of respondents did not believe there would be an impact on the market or on their operation in particular.

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