

# EUROPEAN ECONOMIC AREA

## STANDING COMMITTEE OF THE EFTA STATES

Ref. 1129746

10 March 2014

### SUBCOMMITTEE II ON THE FREE MOVEMENT OF SERVICES

#### EEA EFTA Comment

**on the proposal for a directive of the European Parliament and of the Council amending Directive 96/53/EC of 25 July 1996 laying down for certain road vehicles circulating within the Community the maximum authorised dimensions in national and international traffic and the maximum authorised weights in international traffic – COM(2013) 195**

#### 1. GENERAL

1. Directive 96/53/EC is an important tool for ensuring an efficient, competitive, secure and sustainable common transport policy. A policy which, inter alia, has to take into account that the EU and EEA countries all compete with other regions and countries outside Europe with lower production costs, including transportation costs, regional differences within Europe and the fact that one size does not fit all.

#### 2. CROSS-BORDER TRANSPORT

2. The EEA EFTA States would like to raise one concern about the proposal. There is a need for a modal shift from land to rail and sea transport. It must, though, be acknowledged that the modular concept also has a place in a common transport policy with reference to the Directive and the latest interpretation from the Commission. Restricting instead of developing this policy further might not promote an efficient, competitive and sustainable transport policy, taking into account the fact that two European Modular System (EMS) trucks can replace three traditional vehicles.
3. The land transport industry needs a predictable and comprehensible framework. A ban or weight restriction on the cross-border use of EMS trucks might be difficult to justify to a land transport industry that has possibly aligned itself and invested in line with the latest interpretation from the Commission. Furthermore, a ban might open up for illogical or evasive practices, for example national EMS transport to a border, separate cross-border transport with the trailer and further national EMS transport after the border and onwards. This might be one consequence of a ban on cross-border transport

with EMS trucks, a limit on one border crossing and/or a (too) low maximum weight limitation for international transport. The EU and EEA States might be better suited to deciding upon these matters between themselves, based on the principles of subsidiarity and non-discrimination. This is not least important for rural parts of Europe, where rail and sea transport might not always be viable alternatives and where the infrastructure does allow for such trucks.

### **3. COMPETITIVE FRAMEWORK**

4. The development of a competitive framework for all modes of transport is important, not one or two at the expense of others, taking into account both the concept of co-modality and the acknowledgment that all modes of transport have a role to play in our common transport policy.
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