

CONSULTATION PAPER

REVIEW OF THE INTERNAL MARKET IN ROAD FREIGHT TRANSPORT

The current EU policies and legislation

The White Paper on Transport¹ presented by the Commission on 28 March 2011 called for additional actions to further integrate the internal road freight transport market. The Commission's objective is to create an economically efficient, environmentally sustainable and socially equitable internal market that ensures fair competition between transport operators, delivers high quality services to shippers, provides quality jobs for transport workers and minimises the road haulage sector's environmental and climate footprint. The White Paper recognises:

- that market opening needs to go hand in hand with measures to ensure a level playing field, quality jobs, working conditions and environmentally sustainable transport;
- that human resources are a particularly crucial component of any high quality transport system;
- the need to align the competitiveness and the social agenda, building on social dialogue and promoting social progress in the sector;
- technological innovation together with the related social, business and organisational innovations can help the transition to a more efficient and sustainable European transport system.

The most recent change in the relevant EU legislation took place in December 2009 when new regulations modernising the rules governing road transport were adopted, including Regulation (EC) No 1071/2009 establishing common rules concerning the conditions to be complied with to pursue the occupation of road transport operator and Regulation (EC) No 1072/2009 on common rules for access to the international road haulage market. Regulation 1072/2009 also changed the rules applicable to cabotage operations. The objective was to eliminate the uncertainties associated with the possible differing national interpretations of the applicable cabotage rules.

The EU has also harmonised the social rules, in particular the driving times and rest periods through Regulation (EC) 561/2006, enforcement through Regulation (EC) 3821/85 and Directive 2006/22/EC and the technical, environmental and safety standards related to the vehicles. Attempts have been made at the harmonisation of the relevant fiscal conditions as well. A framework for charging trucks for the use of infrastructures has also been put in place (Directive 1999/62/EC, the so-called Eurovignette Directive).

Under Regulation 1072/2009 the Commission is bound to draw up a report on the state of the Community road transport market by the end of 2013 assessing whether harmonisation of the

¹ Roadmap to a Single European Transport Area - Towards a competitive and resource efficient transport system.

Available on http://ec.europa.eu/transport/strategies/2011_white_paper_en.htm

rules applicable to the road transport market has progressed to such an extent that the further opening of domestic road transport markets, including cabotage, could be envisaged.

http://ec.europa.eu/transport/road/consultations/index_en.htm

Respondents can send an electronic copy of their replies to the following e-mail address:

MOVE-D3-CONSULTATION-TRANSPORTS@ec.europa.eu

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The European Commission does not guarantee the accuracy of the information provided, nor does it accept responsibility for any use made thereof.

The contributions received from stakeholders will be published on the Commission's website, unless requested otherwise by their authors. A consent box is provided at the end of the questionnaire.

Consultation period

In order to meet the High Level Group's tight reporting schedule, questionnaires should be returned by **30th September 2011** or preferably sooner. Nevertheless, questionnaires that are returned before 31 October 2011 will still be taken into consideration

Transport for London: responses to questionnaire on review of the internal market in road freight transport

Questionnaire

I. ABOUT YOU

To help us analyse the answers to this consultation, please provide the following information about you or your organisation.

I.1. Question:

In what capacity are you completing this questionnaire?

Answer (please tick one):

- as a citizen
- private sector enterprise
- industry association or non-governmental organisation (NGO)
- public authority

I.2. Question:

Please indicate if your organisation is registered in the Transparency Register of the European Commission?

http://europa.eu/transparency-register/index_en.htm

Answer (please tick as appropriate):

- Yes
- No

If yes, please indicate the identification number

Answer (free text): 18756626989-49

I.3. Question:

What is the name of the organisation or authority?

Answer (free text):
Transport for London (TfL)

I.4. Question:

Please provide details of the activities of your organisation. If there are multiple activities (e.g. haulage, freight forwarding) could you please indicate the relative importance of each?

Answer (please tick as appropriate):

- Road haulage
- Freight forwarding
- Other transport activity (please specify)
- Other economic activity (please specify)

Answer (free text):

TfL is the statutory, integrated body within Greater London responsible for implementing the Mayor's Transport Strategy (MTS). Within the field of passenger-carrying transport it manages London's buses, trams, Underground services, the Docklands Light Railway, London Overground suburban train services, river services, licenses London's taxis, and promotes cycling and walking initiatives.

TfL is also responsible for major highways (580km of roads which carry 33 per cent of all traffic, known as the Transport for London Road Network), operation of traffic signals in the city, enforcement of the Central London Congestion Charge and the London Low Emission Zone. TfL has a legal Network Management Duty to reduce delays on London's road network.

TfL provides funding for sustainable freight and road safety projects, as well as transport scheme funding to London's borough councils through Local Implementation Plans.

Please note that in the cause of transparency if respondents do not provide the above details about their organisations, then under Commission rules their responses will be recorded as responses of individuals.

II. QUALITY IN THE ROAD HAULAGE SECTOR

Economic efficiency, environmental sustainability and social fairness in the road freight transport sector are dependent on its quality.

Quality must be approached both from the levels of quality aspects and the availability of information about the actual quality levels (i.e. market transparency). Quality can relate, for example, to the service being offered to shippers (reliability, flexibility, security etc.), safety and environmental performance and working conditions.

Depending on the aspects, quality levels and transparency can be addressed by self regulation and/or regulations.

II.1. Question:

Which aspects of quality in the road haulage sector do you think should be improved?

Answer (please tick as appropriate, you can select more than one answer):

- Economic efficiency**
- Reliability**
- Flexibility**
- Safety**
- Security**
- Environmental performance**
- Social fairness**
- Other (please specify below)**

Answer (free text):

The Mayor’s Transport Strategy contains a number of policies and proposals aimed at improving economic efficiency through reducing congestion and journey time variability (i.e. improving reliability) for all road users, including freight. However, improving compliance with regulations is critical and underpins outcomes such as improving road safety, enhancing quality of life (e.g. improving air quality and reducing noise pollution) and reducing London’s greenhouse gas emissions, which are highly important to the Mayor.

II.2. Question:

Do you think that different quality aspects and different quality levels should apply in the cases of domestic transport, international transport and cabotage or other transport segments?

Answer (please tick as appropriate):

- Yes**
- No**

If yes, please specify which quality aspects and levels should be applied in each of these forms of transport?

Answer (free text):

The same, high, quality is expected from all operators, irrespective of country of origin. With regard to road safety, foreign road freight vehicles account for around two per cent of all injurious collisions involving road freight vehicles in the capital between 2008 and 2010. However data concerning journeys made by foreign-registered vehicles to, from and within London is not available so it is not possible to determine if the rate of involvement (per vehicle-km) is greater than that of domestic hauliers.

II.3. Question:

In order to improve transparency should there be recognised differentiated (i.e. higher and lower) levels of quality for each of the following categories: freight forwarders, hauliers and drivers?

Answer (please tick as appropriate):

- Yes
- No

If yes, please specify which quality aspects and levels should be applied for each of these actors?

Answer (free text):

Please see response to II.2

II.4. Question:

If you answered yes to questions II.2 and II.3 then should the different aspects and levels of quality be implemented through:

Answer (please tick as appropriate):

- self-regulation and industry standards?
- legislation?
- a combination of the above two approaches?

For each aspect of quality that you named above please specify below.

Answer (free text):

a) Regulation is useful in achieving many desired outcomes for the freight sector, however the capability of operators and the vehicle manufacturing industry to develop innovative, sustainable solutions, often in partnership with the public sectors, should be recognised.

b) The industry in the United Kingdom and the European Union as whole, is well-regulated. However, TfL seeks to engage with freight operators and other industry representatives to ensure a mix of robust, yet achievable improvements to freight's economic, social and environmental sustainability are in place. The Freight Operator Recognition Scheme (FORS) is a key TfL programme. It incorporates training for drivers and freight managers, and wider exchanges of information to help improve the economic, environmental and social sustainability of deliveries in London. Operator performance is recognised at three levels, bronze, silver and gold.

II.5. Question:

Since there are rules setting out qualitative criteria applicable to hauliers and drivers, should there also be qualitative criteria for freight forwarders?

Answer (please tick as appropriate):

- Yes**
 No

If yes, what should be the criteria for freight forwarders?

Answer (free text):

Some qualitative criteria for hauliers and drivers are set out in a number of different pieces of legislation (often enforced by different agencies).

However, these do not cover all fleet sectors to the same standards (for example van drivers in the UK do not need to comply with the Working Time Directive and van operators do not need Operators' licences). The qualitative criteria that do exist are therefore disparate, diverse and frequently inconsistent, making them difficult to use as an aid to procurement. TfL's Freight Operator Recognition Scheme addresses this issue by setting a standard underpinned by the legislative requirements designed to be used in the procurement of freight operations.

This concept is further embedded within TfL's Delivery and Servicing Plan and Construction Logistics Plan concepts. Planning authorities are urged to request these of property developers, building occupants and businesses serving those premises. The same approach could be used by freight forwarders who employ hauliers to ensure they are a) lawful and b) using best practice to improve their sustainability and that of their supply-chain.

If no, do you consider that current rules relating to hauliers should be modified to take account of situations where the haulage operations of an individual company are less important than the freight forwarding and subcontracting operations?

Answer (please tick as appropriate):

- Yes**
 No

If yes, in what way?

Answer (free text):

Not applicable

II.6. Question:

Do you consider that innovation and its deployment are currently inhibited in the road haulage sector?

Answer (please tick as appropriate):

Yes

No

If yes, what do you consider the major problems and what can be done to overcome them?

Answer (free text):

There is a lack of an effective framework to recognise the benefit to hauliers of introducing innovation. This leads to uncertainty, as hauliers are often presented with a confusing array of initiatives. TfL's Freight Operator Recognition Scheme (FORS) offers a framework within which the range of innovations on offer to hauliers can be structured, thus enabling the merits of each innovation or initiative to be measured against qualitative outcomes (e.g. CO₂ reduction, collision reduction, improved business efficiency).

Such a framework approach may help operators understand the need for particular innovations and may also help producers (for example, manufacturers of ITS equipment) better understand market needs. This incentivises development and therefore stimulates further innovation.

III. SOCIAL ISSUES AND ENFORCEMENT OF ROAD TRANSPORT RULES

In order to maintain an efficient road transport system, jobs in the sector must remain attractive which implies the rewarding of higher qualifications and improved working conditions.

Moreover, fair competition and a level playing field for operators require more uniform national enforcement policies, of which dissuasive, effective and proportionate sanctions constitute an important element. In addition, all the actors throughout the transport chain must be committed to compliance with the rules.

III.1. Question:

Do you consider that there is a shortage of drivers in the road freight transport sector?

Answer (please tick as appropriate):

- Yes
- No

If yes, what do you think are the main reasons for the shortage of drivers?

Answer (free text):

Freight operators and relevant trade associations are better placed to answer this question.

However, TfL notes that increasing regulation of the drivers of larger vehicles, coupled with the trend towards smaller and more frequent consignments has led to increased reliance on the van sector which currently has no professional driving requirements in the UK.

Furthermore, there is a need to provide convenient-located facilities where lorry drivers can take required rest breaks.

If yes, what actions do you think should be taken to improve the situation?

Answer (free text):

Not applicable. Freight operators and their trade associations are better placed to answer this question.

III.2. Question:

Do you think that certain jobs should be reserved for drivers with higher qualifications?

Answer (please tick as appropriate):

- Yes
- No

If yes, which jobs?

Answer (free text):

TfL supports measures which improve the skills and behaviour of drivers and other staff working within the supply chain. Increased skill is required when driving

dangerous goods and when driving large goods vehicles in urban areas where the risk of collision with vulnerable road users is increased.

As per TfL's response to Question II.4, FORS is a scheme designed to improve economic efficiency and reduce the environmental and social impact of freight operations. FORS creates a marketplace for training and provides access to suitably accredited training at discounted prices. To achieve a high award rating in FORS, operators must demonstrate a high quality of staff training.

III.3. Question:

Do you consider that enforcement practices are sufficiently harmonised across the EU?

Answer (please tick as appropriate):

- Yes
- No

If no, what are the main problems?

Answer (free text):

TfL operates the London Low Emissions Zone (LEZ), Congestion Charging (CC) Scheme and the city's speed camera network. Within LEZ and CC, significant numbers of penalties, known as Penalty Charge Notices (PCNs), are issued to non-UK freight vehicles. TfL has a dedicated European Foreign Debt recovery contractor who, wherever possible, issues a PCN to the registered keeper of the vehicle as provided by the relevant European vehicle licensing agency.

TfL considers there would be benefits from closer co-operation between national enforcement agencies across the EU. In the longer term, legislation to enforce compliance with low emission / green zones, building on the draft directive facilitating cross-border enforcement in the field of road safety COM(2008) 151, would be beneficial.

III.4. Question:

In your opinion are sanctions and the levels of penalties sufficiently harmonised?

Answer (please tick as appropriate):

- Yes
- No

III.5. Question:

Do you consider that sanctions and penalties function as an effective deterrent against non compliance?

Answer (please tick as appropriate):

- Yes
 No

III.6. Question:

What are your recommendations to improve the current situation in terms of enforcement practices, sanctions and levels of penalties?

Answer (free text):

In the case of London, current sanctions and penalties form an effective deterrent when it is possible to enforce them. Sanctions and the specific penalties are matters for member states on the basis these decisions are best taken locally, although there is a wider role for the European Commission in this area. Better co-operation between national enforcement and vehicle licensing agencies would be beneficial for collection agencies.

The level of compliance with vehicle operating requirements (motor vehicle roadworthiness and drivers hours) worsened in London between 2006 and 2009² for both UK and foreign-registered HGVs. Greater enforcement with combined activity with different enforcement agencies is desirable. However, a complementary approach introduced by TfL's Freight Operator Recognition Scheme enables those employing hauliers who are members of the scheme to have improved confidence they are using firms who comply with the law.

In this regard, TfL welcomes recent agreement on the draft directive facilitating the cross-border exchange of information on road safety related traffic offences COM (2008) 151. However, the scope of the directive should be extended to include offences such as the failure to pay road user charges, failure to comply with green / low emission zones and non-payment of parking fees as priorities. Equally, the data exchange mechanisms established by the draft directive should be reinforced by robust enforcement measures in the case of an identified driver ignoring a cross-border penalty.

III.7. Question:

Do you think that mechanisms should be introduced to engage the liability of shippers and freight forwarders for certain serious infringements by road hauliers and their drivers?

² See table 4.11 in the London Freight Data Report:
<http://www.tfl.gov.uk/microsites/freight/documents/london-freight-data-report-2010.pdf>

Answer (please tick as appropriate):

- Yes
- No

If yes, which mechanisms should be introduced and for which serious infringements?

Answer (free text):

The Mayor's Transport Strategy and The London Plan (the spatial development / land use plan for the Greater London area) give planning authorities the ability to request Delivery and Servicing Plans and Construction Logistics Plans. These apply to the building developer and occupants. This is intended to help improve safety throughout the supply chain process.

IV. ROAD USER CHARGES AND DRIVING RESTRICTIONS

Non discriminatory road pricing whereby vehicle operators pay a proportionate and fair price for using the road infrastructure independent of their country of establishment and the origin and destination of their load is an important element in ensuring fair competition in the internal market. In addition, variable road charges³ can provide clear price signals to better manage traffic flows and create more resource-efficient and sustainable transport by reducing congestion and the environmental impact of road transport.

Today many fragmented national charging systems and policies exist in parallel that require hauliers engaged in international transport to purchase the Eurovignette, several national vignettes and various different electronic tags and on-board units to be able to drive unhindered on Europe's tolled roads.

While road user charging can improve the use of infrastructure, at the same time there are many restrictions that limit the flexibility of hauliers to operate during certain time periods such as during the night, over the weekend and over certain holiday periods. However, technological solutions exist to successfully address the concerns that originally prompted many of these restrictions. For example, urban delivery vehicles can be specified with very low noise emissions.

IV.1. Question:

Do you consider that the multiplicity of road charging systems in the EU represent a problem for the internal road haulage market?

Answer (please tick as appropriate):

- Yes
- No

³ Defined as toll in the legislation

If yes, what are the main problems?

Answer (please tick as appropriate):

- Insufficient interoperability of electronic tolls
- Differences of charging principles
- Others (please specify below)

Answer (free text):

Whilst a common framework for road tolling applicable to HGVs on the Trans-European Network is an effective approach to ensuring the efficient working of the internal market, no such case can be made on parallel or secondary routes. Within urban areas in particular, road user charging and the particular system adopted are local matters best devolved to elected representatives. For example, measures that work well in one city may not work – or be culturally acceptable - in another. Although TfL is supportive of the principle of externality charging, the establishment of policies to implement such systems should be taken locally with cities and regions having the freedom to design their own systems and charge levels to meet their individual challenges. In terms of the Eurovignette Directives, their scope should be limited to the Trans-European Network.

Whilst road transport does impose environmental and social costs on society, it also provides substantial benefits. The key issue is to strike a balance between these benefits and the costs imposed. These will be different depending on the location. Flexibility in the permissible level of external charges is crucial.

IV.2. Question:

Should existing taxes or charges like the annual vehicle tax and time-based road user charges (vignettes) or other taxes be replaced by distance based road user charges?

Answer (please tick as appropriate):

- Yes
- No

Please explain your position. If yes, what are the reasons? If no, what are the reasons:

Answer (free text):

In London, the Mayor's Transport Strategy provides sufficient flexibility to consider introduction of a distance-based road user charging regime in future. In pursuit of the principle of subsidiarity - taking decisions at the most appropriate level - a decision on time-based or distance-based charges should be left to local decision makers.

If you answered "yes" to question IV.2, should such a variable charge include:

Answer (please tick as appropriate):

- Infrastructure costs
- Environmental costs like the costs of air and noise pollution
- Congestion costs
- Any other costs (**please specify below**)

Answer (free text):

IV.3. Question:

While road user charging can improve the use of infrastructure, do you agree that measures enabling a 24 hour use of infrastructure could be investigated as another means for achieving an efficient use of infrastructure?

Answer (please tick as appropriate):

- Yes
- No

Please explain if appropriate (free text):

As above, TfL does not believe a one-size-fits-all approach to infrastructure charging across the European Union is either desirable or necessary.

However, TfL is supportive of measures to encourage deliveries and servicing at quieter periods of the day as this would encourage more efficient use of available road capacity in evenings, overnight and early mornings.

Safeguards need to be put in place to reduce the impact of deliveries which may disturb local residents. The 'Quiet Delivery Demonstration Scheme' in the UK has sought to test the potential measures which can be put into place to help reduce noise pollution from vehicles, machinery and staff activity.

V. CABOTAGE

The current EU cabotage rules entitle road hauliers to carry out up to 3 cabotage operations within 7 days after the full unloading of an international transport. One or more of these 3 operations may be carried out in other Member States (one per Member State within 3 days from the unladen entry into the territory of that Member State).

While giving more flexibility for international transport than previous rules, the current rules were conceived as a transitional step towards a more integrated internal market. They do not differentiate according to any quality criteria related to the operator, the driver or the vehicle contrary to existing schemes that promote higher quality transport (such as the ECMT licensing⁴ system which rewards operators using greener and safer vehicles with up to 10 times more licences). Moreover questions as to the proper enforcement of the current rules may arise.

V.1. Question:

Has the change in cabotage rules introduced in May 2010 been valuable to you?

Answer (please tick as appropriate):

- Yes
- No

If no, please explain why.

Answer (free text):

Not applicable: this question is best answered by freight operators.

V.2. Question:

Do you think that the controls aimed at ensuring compliance with the current cabotage rules are effective?

Answer (please tick as appropriate):

- Yes
- No

If no, please give reasons and your opinion how the controls can be improved.

⁴ ECMT licences are multilateral licences for the international carriage of goods by road for hire or reward by transport undertakings established in an OECD/ITF member country.

Answer (free text):

Not applicable: this question is best answered by freight operators.

V.3. Question:

In your opinion do the current rules on cabotage limit the flexibility of hauliers and hence their efficiency?

Answer (please tick as appropriate):

- Yes
- No

V.4. Question:

If you answered “yes” to the above question, then what changes should be made to the current cabotage rules in order to further the use of cabotage? You may select more than one answer.

Answer (please tick as appropriate):

- Remove the link between international transport and cabotage
- Remove the need for the completion of the international transport operation (full unloading) before the cabotage operations can start
- Increase the limit of seven days within which the cabotage operations have to be carried out
- Increase the maximum number of cabotage operations (3) that can be carried out within the 7 day period
- Increase the limit of one cabotage operation that can be carried out in countries other than the one where the international transport operation was completed
- Increase the limit of 3 days to carry out the permitted cabotage operation after the unladen entry into a Member State
- Other. **Please explain below**

Explanation (free text):

Although questions on cabotage are beyond TfL’s competence, in some limited instances there might be flows to / from EU countries where a lorry returning empty at present could be filled or part-filled e.g. intensifying “Groupage”. This could help reduce empty running and therefore increase lading factors (e.g. HGVs in London currently have a factor of only 0.56).

V.5. Question:

As an alternative to the current cabotage rules do you think that the entitlement for hauliers to carry out cabotage could be determined as a maximum percentage of their total annual transport performance?

Answer (please tick as appropriate):

- Yes
- No

V.6. Question:

As an additional or alternative criterion, should vehicle, driver and operator quality be a factor in cabotage rules?

Answer (please tick as appropriate):

- Yes
- No

If yes, which aspects of quality for the vehicles, drivers and operators should be considered? Please select as appropriate. You may select more than one option.

Vehicle

- Use only vehicles that meet the latest applicable EURO standard
- Install satellite positioning (e.g. GPS, EGNOS, later Galileo) units specifically designed for trucks in their vehicle to prevent the use of roads that are unsuitable for heavy goods vehicles
- Install tracking and tracing functionality into their vehicles to allow easier enforcement and compliance monitoring by control authorities
- Install (when available) integrated Intelligent Transport System (ITS) applications
- Other criteria (**please specify below**)

Other criteria (free text):

As already stated TfL does not have the competence to comment specifically on cabotage. However, with regard to the measures listed above, the London Low Emissions Zone requires operators to invest in cleaner engine technologies (e.g. from January 2012, to avoid paying a daily charge, HGVs will need to offer at least Euro IV emissions performance [regarding PM₁₀]).

Driver

- Driver qualifications (e.g. ecodriving)
- Other criteria (**please specify below**)

Other criteria (free text):

As already stated TfL does not have the competence to comment specifically on cabotage. However, reflecting TfL's previous answers, TfL offers training and other financial support, through FORS, to operators seeking to improve the safety, environmental and economic performance. FORS is open to operators from across the EU and welcomes expressions of interest from non-UK operators.

Operator

- Whether the operator signs up to a "Social Code" on the minimum pay and other relevant working conditions for their drivers
- Whether cabotage operations are carried out only during non congested time periods
- Whether the operator enters into a commitment to improve the CO2 efficiency of their transport operations by an agreed percentage
- Other criteria (**please specify below**)

Other criteria (free text):

Without commenting on cabotage specifically, please see the answer to Question IV.3 re: technological and behavioural measures.

VI. OTHER QUESTIONS

VI.1. Question:

Do you have any other comments or suggestions which you consider should be taken into account during the revision of the European legislation concerning the road haulage sector?

Answer (free text):

TfL's experience suggests there is a balance between high and low-tech solutions for freight activity. TfL has pioneered the use of Delivery and Servicing Plans and Construction Logistics Plans as part of a sustainable strategy for urban mobility

covering all users and modes. These plans are based on how businesses procure goods and services and are aligned to benchmarking performance tools such as FORS. The Plans themselves are flexible and range in their geographical jurisdiction. Individual elements of these plans could be made substantially more robust by common technology standards for detailed street mapping such as delivery bay locations with data provided by cities. They would also benefit from future technology platforms such as those proposed by projects such as the Cooperative Vehicle Information Systems (CVIS) which is being used for booking freight delivery space.

With regard to environmental zones, the EU should consider developing standard retrofit documentation enabling cross border recognition of retrofitted vehicles. In the longer term the European Commission should develop common standards for retrofit equipment.

The free market has a key role to play in developing new technologies (the recent developments in internet mapping and satellite navigation services are good examples of this). Any development of future European standards for new and emerging technologies needs to be done in such a way as to recognise this, and encourage innovation through co-operative working across the public and private sector.

Finally, continued and indeed, increased EU research and development funding will be crucial if the ambitions in the recent Transport White Paper, 'Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system COM(2011) 144' are to be turned into reality. TfL hopes that FP7 and its successor programme 'Horizon 2020' will focus on delivering market ready technologies through demonstration projects of cleaner and quieter road haulage vehicles.

VI.2. Question:

Do you agree that the Commission publishes your response?

Answer (please tick as appropriate):

Yes

No