



30.10.2013

Dear Members of the TRAN Committee and Substitutes,

We are writing to you to share the experience that the Nordic countries and the Netherlands have on the longer and heavier vehicles. Together our fourteen associations represent the majority of cargo and truck owners in these countries.

We are concerned about the Commission proposal to allow only longer vehicles to make one border crossing. While fully supporting the clarification of the current directive we would like to see free circulation of longer and heavier vehicles to be allowed to cross borders when this is in accordance with the regulations of the Member States involved. The apparent limitation to only one border crossing and excluding heavier trucks is illogical and will hinder making transport more energy-efficient.

Our countries have wide experience on EMS-trucks (European Modular System). In Finland and Sweden longer and heavier EMS-trucks have already been used for over fifteen years. At the same time the performance on rail transport in these countries is one of the highest in the Europe (for example in Finland one fourth of all transport of goods is by rail). No disturbance on the market share of each transport mode has been observed. Furthermore, the transport modes are more complimentary than competitors to each other.

EMS-trucks provide better economic, environmental and safety performance since in many cases three traditional vehicles can be replaced by two EMS-trucks. A monitoring study in the Netherlands, where the number of EMS-trucks count up to nearly a thousand, concludes that the use of EMS-trucks is an important innovation in the effort to reduce CO<sub>2</sub> emissions and that the use does not lead to a reverse modal shift. A trial in Denmark came to the similar conclusion. In Sweden a study shows that the usage of EMS-trucks reduces the CO<sub>2</sub> emissions by 15-20 % compared to traditional trucks. Other emissions decrease relatively. A recent study in Finland shows that also the traffic safety improves as there are fewer vehicles in circulation. Fewer vehicles mean also less congestion.

Trade is intense between our countries, which requires efficient road transport. It is essential to be able to cross the borders using the same vehicle all the way to the destination.

We appeal the members of the TRAN Committee to look carefully into the experience and impact assessments in our countries. Based on our experience we strongly recommend that the circulation of longer and heavier vehicles be allowed in the Member States that allow similar regulations.

Should you have any question we would be happy to give more information as representatives of these associations.

Yours sincerely

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