



31 January 2022

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Regarding the Revision of the Return Home of Trucks Requirement

The undersigned associations from Lithuania (TTLA, LINAFA), Poland (TLP), Bulgaria (SMP), Romania (ARTRI), Hungary (NIT) and Croatia (UHCP), would like to draw your attention to the urgent need to revise the return home of trucks requirement, in order to avoid proved negative effects on the functioning of the EU road transport market, as well as on the ambitious EU Green Deal and Fit for 55 goals.

Putting the damaging environmental ramifications aside, we as the road transport industry representatives are highly concerned with the findings of the European Commission's study on the impacts of the obligation of regular return home of trucks on the EU Single Market. Following the study's estimation of extra costs on the Eastern European hauliers, i.e. 10 thousand euros per vehicle and 100 thousand euros per operator, Polish, Lithuanian, Bulgarian and Hungarian hauliers alone would face as much as 6,21 billion; 1,17 billion; 0,53 billion and 0,8 billion euro of extra costs respectively. Even more so 1000 Lithuanian, 4500 Polish, 2424 Bulgarian and 500 Hungarian trucks would return to the country of establishment on a daily basis, crossing number of the EU Member States on empty or suboptimal run. Furthermore, Romania would need to face a strong decrease of revenues from road transport (around 4,5 billion euro) and extra costs per truck per year (around 12000 euro).

There are also many other challenges that render the regular return home of trucks obligation irrational measure and may result in even higher costs, not only for road transport but other industries and ultimately the final consumers as well. Some of the most crucial of them are as follows: ongoing distortion of global supply chains; growing demand for goods and rising prices for transport services that have already reached record-breaking levels; soaring prices of fuel and energy resources; limited

production of trucks due to the lack of semiconductors and other materials; ever-increasing shortage of drivers; COVID-19 pandemic related uncertainties.

What is more, compulsory return home of trucks is clearly against the one of the basic rules followed by every road transport entrepreneur: that is the most effective utilization of trucks possible. Yet road transport businesses will need to direct trucks home, very often empty, instead of performing another important road transport service for their clients. In addition, mandatory return home of trucks have nothing in common with improving drivers working conditions whatsoever, which is one of the main goals of Mobility Package introduction, according to the EU.

We are aware, that based on the outcomes of the study, the European Commission prepared the draft of a regulation aiming to delete the return home of trucks requirement. However, a legislative procedure has not been initiated yet, in spite of the impending entry into force of the obligation set on 21 February 2022.

It is of utmost concern, that there are no indications about any further steps in revising the return home of trucks requirement for the time being. The European Court of Justice of the EU has been examining the issue for over a year now and most likely would continue proceeding next year or even longer. Therefore, the imminent implementation of the requirement in couple of weeks does not leave grounds for the EU legislators to rely on the future decision of the European Court of Justice of the EU.

Against this worrying background, we would like to ask the European Commission to use one of the legal tools at its disposal and propose a moratorium on the implementation of the return home of trucks requirement, until the European Court of Justice of the EU decision is in place. The suspension is vital for the road transport industry in avoiding proved damaging effects of the requirement, as well as in tackling current economic and other challenges.

Yours sincerely,

