

# Public consultation on the enhancement of the social legislation in road transport

Fields marked with \* are mandatory.

Questionnaire for authorities, enforcement bodies, workers' organisations, industry associations

What is this consultation about?

- EU social rules in road transport (driving, resting and working times)
- Issues related to the posting of workers

as regards their implementation, functioning and possible improvements.

The European Commission has launched a review of the social legislation in road transport as regards:

- [Regulation 561/2006](#) on driving times, breaks and rest periods,
- [Directive 2002/15/EC](#) on the working time of road transport 'mobile' workers,
- [Directive 2006/22/EC](#) on controlling compliance with the provisions on driving times, breaks and rest periods.

This review will also address certain issues related to the posting of workers governed by [Directive 96/71/EC](#) and its enforcement requirements set out in [Directive 2014/67/EU](#).

Find out more about the social legislation in road transport on the [DG MOVE website](#). You can also find more about the evaluation of these rules by reading the findings of a [report](#) prepared by independent experts for the Commission.

## Section 1: About You

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\*1. You are replying as/on behalf of:

- EU governmental authority
- Intergovernmental organisation
- Non-governmental organisation (NGO)
- Regulatory authority (e.g. national transport regulator, national competition authority)
- National enforcement authority
- Enforcement authorities' organisation
- Industry association
- Workers' organisation (e.g. trade union)
- Academic body (e.g. research institute, training organisation)
- Other (please specify)

1.1. Please specify what kind of organisation you represent

for associations/organisations/authorities only

- Consumer or citizen association
- Association representing road transport workers
- Association representing freight road transport operators
- Association representing passenger road transport operators
- Association representing freight forwarders
- Association representing shippers
- Association representing small/medium businesses
- Association of national authorities
- Association of regional authorities
- Other (please specify)

\*1.2. Full name of the organisation you are replying for:

100 character(s) maximum

ECFD - European Conference of Fuel Distributors

1.3. How many members does your organisation represent?

100 character(s) maximum

5 members: Austria, Belgium, France, Germany and the UK.

\*1.4. Is your organisation registered in the [EU Transparency Register](#)?

- Yes
- No

\*If yes, what is its registration number?

15 character(s) maximum

48067211204-09

\*2. Your contact details (name, email and telephone number):

200 character(s) maximum

You must provide these details in order to continue – but you can opt for your answers to remain anonymous when results are published

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\*3. Do you consent to the Commission **publishing** your replies?

Even if we do not publish your replies, they may be subject to a request for access to documents under [Regulation \(EC\) No 1049/2001](#).

- Yes** (*I consent to the publication of all my replies and any other information I provide, and declare that none of it is subject to copyright restrictions that prevent publication*)
- Only anonymously** (*my replies can be published, but not with any information identifying me as the respondent*)
- No** (*my replies will not be published but may be used internally within the Commission*)

\*4. What is your organisation's country of establishment?

Belgium

5. What is your main geographical area of activity?

- National (only home country/country of establishment)
- EU-wide (on the level of EU Member States) and at the level of the European Free Trade Association (Iceland, Liechtenstein, Norway, Switzerland)
- International (European Union, European Free Trade Association and other countries)
- Other (please specify)

## Section 2: Your views and experience on the social rules applicable to road transport and their potential shortcomings

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6. How familiar are you with the EU social rules applicable to road transport?

	Not familiar	Slightly familiar	Quite familiar	Very familiar
Regulation on driving times, breaks and rest periods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Directive on working time of drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Directive on enforcement of the rules on driving times, breaks and rest periods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Directive on the posting of workers (and its enforcement directive)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

This section (Questions 7 to 17) aim at identifying or confirming the main problems, which affect the working conditions for drivers, competition between operators and road safety levels linked with the EU social rules in road transport (rules on driving and working times, breaks and rest periods and their enforcement).

7.a. What are the main **market challenges** in road transport?

Rank them 1 to 5 ( *1 being the most important*).

	1	2	3	4	5
Illegal employment practices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Carrying out most operations in/from countries other than transport operator's country of establishment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Long cross-border subcontracting chains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Decreasing net margins in road transport industry	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fierce competition based on costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase in hiring of drivers from non-EU countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increasing use of vehicles below 3.5 tonnes in commercial transport operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Long periods away from home/base	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Shortage of drivers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor infrastructure, resting and sanitation facilities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pressure from clients/Time pressure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7.b. What are the main **legislative challenges** in road transport?

Rank them 1 to 5 (1 being the most important).

	1	2	3	4	5
Complexity of EU social rules for road transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different application of the social rules in different Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor enforceability of certain social rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Uncoordinated national measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Diverging enforcement practices within and among Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Low compliance with the social rules by drivers /operators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Diverging levels and types of penalties among Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
High regulatory costs of complying with EU social rules (administrative costs, monitoring and control, equipment and software, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. Is the current road transport social legislation appropriate to address the challenges for the sector (adequate protection for workers, fair competition between operators, road safety)?

	Appropriate	Not appropriate	Don't know
Social protection rights of road transport workers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fair competition between operators	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved road safety	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Additional comments?

*2000 character(s) maximum*

The fuel distribution sector relies on a relatively stable number of drivers, working in a limited number of companies. Drivers are a premium for companies which have a vested interest in guaranteeing them adequate protection. Relatively small amounts of each working day are spent driving and are usually carried out in daylight hours. Their high level of qualification translates into increased road safety. Drivers return home each evening for the daily break so they enjoy quality rest, usually longer than the required legal minimum period.

ECFD supports legislation which makes the industry operate more safely and protects its drivers. However, the current legislation takes no account of sectoral specificities. The home heat sector for example faces a spike in demand for heating fuels during winter, coinciding with poorer road conditions, possibly coupled with supply chain issues. This leads to fuel distributors being less efficient at a time of increased demand. A small change in the driver's weekend rest period during winter would have a profound effect on the sector's ability to deliver fuel during this period. This could be achieved without redress to temporary derogations that are lengthy to obtain, plus the addition of an hour a day to driving time is of little benefit. It is much better and more efficient for a driver to work a full day on his final work day followed by a reduced weekly rest period. This allows fuel to be delivered during daylight hours which is far safer for the driver and reduces risks of spills. This change would only need to be implemented at times of peak demand and would not be envisaged as a regular working practice during this period. To ensure drivers remain safe and avoid long term driver fatigue the reduced rest period should not extend beyond two weeks in any three-week period. All implementations of this reduced rest period would be recorded and monitored for inspection by the appropriate authorities in each of the member states.

## 9. Is it easy to comply (as an operator) or enforce (as a national authority) the EU social rules?

- Not easy at all
- Somewhat easy
- Easy
- Very easy
- Don't know

## Additional comments?

*2000 character(s) maximum*

The European Conference of Fuel Distributors (ECFD) represents the interests of heating fuels distributors which are mainly small and medium-sized, often family-owned, companies. They are locally based and work with only a few employees - highly-trained professional drivers delivering domestic heating oil to their customers.

ECFD members would nevertheless like to point out the difficulties they regularly face when implementing its provisions. As distributors of heating oil, the peak time in demand naturally takes place in winter, when customers' need for the basic commodity that is heating oil is at the highest.

Unfortunately, this peak in demand also happens when weather conditions are degraded, making delivery more difficult and longer due to less practicable roads. This is also the time when demand on the industry suppliers peaks which can cause fuel supply issues into the distribution chain.

It is however during winter times that delivery should be the quickest, not to leave any customer without heating during the coldest months. The strict provisions of the Regulation does not unfortunately provide a flexible framework that would permit heating oil distributors to increase their delivery capacity in winter. Quite paradoxically, the current rules delay deliveries by imposing strict daily and weekly rest periods, to the detriment of customers. Moreover, the articulation of the Working Time Directive (WTD) and the Driving Times Regulation can also raise questions at times.

ECFD members therefore call for a Regulation that would take into account the specificities of their sector, by granting more flexibility. This could easily be achieved by amending article 13(1) so as to add a new exception to the existing list, related to vehicles used to deliver domestic heating fuels. The exception to derogate to the weekly rest periods rules would be limited to certain type of vehicles, defined perimeter and limited timeframe to maintain a high level of social rules.



10. Which provisions are most problematic to understand and/or comply and/or enforce?

	Not at all difficult	Rather not difficult	Rather difficult	Very difficult	Don't know
Daily driving times	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Weekly driving times	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Daily rest periods	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Weekly rest periods	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Weekly working time	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Breaks in driving	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Breaks in work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recording of driver's activities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability periods	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recording driver's periods away from vehicle	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working time of self-employed drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Minimum number of roadside checks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Minimum number of checks at premises	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Co-liability of all actors in the transport operation chain	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Remuneration based on performance (depending on goods carried or kilometres driven)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**Additional comments?**

*2000 character(s) maximum*

Provisions on weekly rest periods are the most problematic when it comes to their enforcement as they do not take into consideration sectoral specific needs.

Heating oil distributors would need more flexibility during winter time, so as to satisfy their customers' need for heating oil as quickly as possible, not to leave them in the cold. Companies are not able to increase their delivery capacity at the most critical time of the year due to a strict application of the weekly rest periods provisions. The Regulation should foresee in its article 13(1) an exception granted to vehicles used to deliver domestic heating fuels. It would enable them to derogate from the mentioned provisions, only for deliveries for a fixed class of vehicles (rigid tankers) within a certain perimeter and during a limited timeframe.

Such a derogation would not go against the Regulation's objectives. Since the only means of transportation used to deliver heating fuels and propane are rigid trucks, competition would not possibly be hampered as it would apply to all heating fuels distribution companies. Moreover, departing from the strict obligations on weekly breaks would not be to the detriment of working conditions and road safety. On the contrary, it will enable drivers to work more and have a higher efficiency during a period where daylight is reduced, limiting risks related to filling tanks, dragging hoses and driving in the dark. The derogation's implementation would be recorded and monitored for inspection by each Member States authorities.

**11. Has EU road transport social legislation contributed to achieving its objectives of:**

	No contribution	Minor contribution	Moderate contribution	Major contribution	No opinion
Improving working conditions for drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Combatting distortions of competition between operators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving road safety by reducing driver fatigue	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**Additional comments?**

*2000 character(s) maximum*

ECFD recognizes the benefits and progress brought by the EU legislative framework on road transport social legislation. The Conference would however like to remind the Commission that in some specific cases, the application of some of its provisions, and notably on daily and weekly rest periods, is detrimental to customers.

In the case of heating oil distributors, the above mentioned provisions prevent them from increasing their delivery capacity in winter time, a time when degraded delivery conditions and peak demand are combined. They are thus unable to meet their customers' need for heating oil as fast as they should, taking into consideration that heating oil is a basic commodity, even more during the coldest months of the year.

As heating oil distributors are most often family-owned businesses, locally-based, they are in the vast majority of cases well acquainted with their customers. In this respect, customer service is not an empty phrase for ECFD members and they therefore call for the Commission to take it into account when revising the legislative framework.

**12. If you think that the EU transport social legislation has contributed to achieving above objectives, to what extent have the following contributed?**

	No contribution at all	Minor contribution	Moderate contribution	Major contribution	I don't know
Uniform EU-wide rules on driving times, rest periods and other work	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Scope of the EU legislation (in terms of: drivers, vehicles and transport operations)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislation offers certain flexibility where needed	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Commission guidelines published on the Europa website, explaining EU law	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of the working time directive to self-employed drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Principle of liability of drivers, employers and other actors in transport chain are set out in EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National risk rating systems to target controls	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common classification of infringements against the social and tachograph rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Administrative cooperation between Member States' authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Establishment of bodies for intracommunity liaison in all Member States to cooperate in the implementation tasks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

<p>Coordination of monitoring and control activities between relevant bodies within Member States (in particular concerted cross-border controls)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<p>Cooperation within existing network organisations (e.g. <a href="#">ECR</a>, <a href="#">CORTE</a>, <a href="#">TISPOL</a>)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<p>Use of the tachograph as a tool for recording and controlling driving, working and resting times</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<p>Support from <a href="#">employers'</a> and <a href="#">workers'</a> organisations in implementing the rules</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**Additional comments?**

*2000 character(s) maximum*

ECFD members have experienced over the years the lack of flexibility of the EU rules related to daily and weekly rest periods. Their sector is not part of the exceptions listed in article 13(1) when their customers would highly benefit from it. Such derogation to rest periods would not contravene to the principles of the Regulation as it would apply to specific vehicles, a limited perimeter and only during the winter period. Competition would not be affected as all heating oil distributors use the same kind of vehicle for delivery. Safety would be increased as drivers would be able to make a larger proportion of their deliveries during daylight hours during a period where daytime is reduced, reducing risks during deliveries.

Moreover, a proper derogation granted to the sector would also address an existing loophole. Some Member States are already aware of the difficulties faced by heating oil distributors during winter, which greatly affect their citizens. In order to solve these issues, some of them regularly use article 14(2) of the Regulation on the temporary relaxation of drivers. ECFD does not consider this recourse to be an appropriate solution. Indeed, winter cannot be qualified as an “exceptional circumstance” or an “urgent case”.

Furthermore, article 14(2) interpretation seems to differ tremendously from one Member State to another according to the Commission’s list of temporary relaxation of drivers’ hour’s rules. In any case, this provision only provides an ad hoc, short term solution to particular unforeseen circumstances and is as such not fit to accommodate the heating fuels distribution sector specific needs.

ECFD strongly encourages the Commission to take into account the heating oil sector specificities when revising the list of exception foreseen in article 13(1) of the Regulation. It would be not only address the lack of flexibility already pointed out by the Conference, but would also ensure an uniform application of EU rules across countries
















**13. What are the specific obstacles to the effectiveness of the social legislation?**

	No obstacle	Minor obstacle	Moderate obstacle	Major obstacle	Don't know
Rules are vague	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rules are complex	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Diverging national interpretations of the EU rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Poor awareness or understanding of the road transport social rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules do not fit the specificities of certain transport services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Rules do not offer sufficient flexibility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Scope of the legislation is not appropriate (i.e. in terms of drivers, vehicles, transport operations covered and exempt)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The working time of self-employed drivers is not controllable	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Return to home/base is not defined	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Unclear rules on taking regular weekly rest (in the vehicle or not)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The rule on performance-based remuneration is too vague	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Roles and responsibilities for infringements among actors in transport chain are not clear and /or appropriate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Commission guidelines published on the Europa website, explaining how to implement EU law, are not legally binding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Poor enforcement capacity ( e.g. insufficient, human, financial, technical resources)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Diverging enforcement practices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Checks give different results, because controllers use different control tools (e.g. software)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National risk rating systems are not harmonized in terms of calculating risk rating	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Controllers have no or limited access to data in risk rating systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Data in risks rating systems is not comparable and exchangeable between Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
National penalty systems differ in levels and types of penalties for infringements	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ineffective cooperation between bodies for intracommunity liaison established in Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>



<p>Poor coordination within Member States between the national bodies responsible for implementation, monitoring, control, etc.</p>					
<p>Poor involvement by certain Member States in the activities of enforcement networks organisations (e.g. <a href="#">ECR</a>, <a href="#">CORTE</a>, <a href="#">TISPOL</a>)</p>					
<p>Insufficient support from <a href="#">employers'</a> and <a href="#">workers'</a> organisations to ensure drivers /operators comply with the rules</p>					

## Additional comments?

*2000 character(s) maximum*

ECFD members have experienced over the years the lack of flexibility of the EU rules related to weekly rest periods. Their sector is not part of the exceptions listed in article 13(1) when their customers would highly benefit from it. Such derogation to rest periods would not contravene to the principles of the Regulation as it would apply to specific vehicles, a limited perimeter and only during the winter period. Competition would not be affected as all heating oil distributors use the same kind of vehicle for delivery. Moreover, drivers of rigid tankers making domestic deliveries can work more safely during daylight hours and so always return home each night for their daily and weekly rest periods which provides them with the best possible conditions for resting.

A proper derogation granted to the sector would also address an existing loophole. Some Member States are already aware of the difficulties faced by heating oil distributors during winter, which greatly affect their citizens. To solve this issue, some of them regularly use article 14(2) of the Regulation on the temporary relaxation of drivers. ECFD does not consider this recourse to be an appropriate solution. Indeed, winter cannot be qualified as an “exceptional circumstance” or an “urgent case”. Furthermore, article 14(2) interpretation seems to differ tremendously from one Member State to another according to the Commission’s list of temporary relaxation of drivers’ hour’s rules. In any case, this provision only provides an ad hoc, short term solution to particular unforeseen circumstances and is as such not fit to accommodate the heating fuels distribution sector specific needs.

ECFD strongly encourages the Commission to take into account the heating oil sector specificities when revising the list of exception foreseen in article 13(1) of the Regulation. It would address the lack of flexibility already pointed out while ensuring an uniform application of EU rules across Member States.

14. What are main benefits/ the added value of having EU-wide social legislation in road transport, compared to action at national level?

- More transparent legal framework for transport sector
- Equal business conditions for transport operators
- Improved health and safety of drivers
- Better work-life balance for drivers
- Common minimum requirements on organising drivers' working and resting time
- Equal treatment of drivers and operators as regards checks
- Uniform minimum rules on enforcement
- More efficient cross-border enforcement
- Improved administrative cooperation and exchange of data
- Less burdensome recording and control activities
- Better road safety linked to reduction in driver's fatigue due to excessive working hours
- Better functioning of the transport market across the EU
- Other (please specify)
- No opinion

Please specify "Other"

*100 character(s) maximum*

EU-wide rules provide a good framework to deliver common standards for safety and driver protection.

Additional comments?

*2000 character(s) maximum*

However, such legislation needs to be framed in such a way as to allow for the range of sectors within a given area to which it applies. For example, the existing Drivers' working time directive addresses the main issues referred to above but is too rigid to apply sensibly to the range of sectors within the haulage sector. The requirements of general haulage with long driving hours is very different to heating oil delivery where drivers spend far fewer hours driving the vehicle. The legislation should afford both areas equivalent protections whilst not impeding them in the normal execution of their operations. Also, the quality of the daily and weekly rest breaks needs to be taken into consideration; drivers who spend each night at home must have better quality rest than those who spend nights in their cabs. Seasonal business such as ours require legislation which is suited to their mode of operation. The current legislation does not provide this.

15. How has the implementation of the EU social rules in road transport changed regulatory costs?

	Significant reduction	Slight reduction	No change	Slight increase	Significant increase	No opinion
Staff costs (e.g. employing enforcement officers, designating national bodies)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Training of enforcers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reporting costs (e.g. collecting data and reporting to the Commission on implementation every two years)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other administrative expenses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Software and hardware equipment for enforcers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Cost of investigations into non-compliance



Additional comments?

*2000 character(s) maximum*

16. Are the costs of compliance (*i.e.: administrative costs, costs of recording equipment and software, costs of training, costs of establishing and running risk rating system, etc.*) justified by the benefits that the EU rules bring?

- Yes
- No

Additional comments?

*2000 character(s) maximum*

Administrative duties to comply with various regulations sometimes leads to duplication, this in turn leads to increased staffing levels, procedures and software to manage relevant requirements, this in turn would increase operational costs which as a sector has suffering from seasonal market place changes, those reducing profit margins

Training of staff /driver within this sector of the industry is to a high standard anyway, by the very nature of the work.

Moreover, fuel distributors are exposed to the risk of losing clients disappointed by late deliveries in winter time, caused by stringent resting times provisions. This is a potential cost to take into account.

17. In the absence of any EU intervention, how do you think that these issues will evolve? Will the identified problems tend to increase or diminish?

*2000 character(s) maximum*

The industry currently operates to a very high standard with excellent training above the requirements of current legislative requirements. In addition, the industry is under a high level of scrutiny by both legislators and the public. Even without further EU intervention in this area there is no reason to think that the current high levels would not be maintained and are more likely to be developed further as the sector continues to share best practice via organisations such as ECFD.

This section (Questions 18 to 19) aim at identifying the main problems, which affect the working conditions for drivers, competition between operators and free provision of cross-border services linked with the implementation of Posted Workers Directive to road transport sector.

18. Do you agree that the application of EU provisions on posting of workers offers road transport operators and drivers the following benefits?

	Don't agree	Somewhat disagree	Somewhat agree	Fully agree	Don't know
Fair competition between operators in the EU is ensured	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of illicit employment practices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Better remuneration for international drivers carrying out a certain amount of work in 'host' Member States with higher rates of pay	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Better social protection of drivers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Balance between social protection of workers and freedom to provide cross-border services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify "Other"

*100 character(s) maximum*

Additional comments?

*2000 character(s) maximum*

19. What are the main problems, if any, regarding the application of the EU provisions on posting of workers to road transport sector?



	Not a problem	Minor problem	Moderate problem	Major problem	Don't know
Lack of awareness about the provisions on posting of workers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provisions on posting are not adapted to the specificities of the highly mobile road transport sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of clarity which national legislation on minimum wage applies to drivers/operators engaged in international transport operations covering several countries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of clarity which terms and conditions of employment of 'host' country apply to drivers/operators engaged in international transport operations ( <i>i.e.: paid annual holidays, minimum rates of pay, maximum work periods, health, safety and hygiene at work, conditions of hiring-out workers, etc.</i> )	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of guidance from the Commission on the implementation of the posting conditions in road transport sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of the national minimum wage legislation of the 'host' Member State increases operational costs of the transport undertaking	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Administrative requirements (e.g. requirement on reporting) imposed on operators/drivers to control application of the national minimum wage legislation of 'host' country are burdensome	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costly and burdensome checks of compliance with the national minimum wage legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Freedom of providing cross-border services is restricted/ fragmentation of the single market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify "Other"

*100 character(s) maximum*

Additional comments?

*2000 character(s) maximum*

### Section 3: Your views on the possible revision of the EU social legislation applicable to road transport and its potential impacts

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The Commission may consider improvements to the current rules and therefore the possibility of a proposal for their revision. In this section, it seeks to find out the stakeholders' views on the initial objectives, possible options for the EU intervention and its potential effects. Stakeholders may, alternatively or in addition, identify other objectives and measures that may be considered.

20. What should be the main objectives of a revision of current EU legislation? Please choose among the following options or propose alternatives.

	Important	Not important	No opinion
To clarify and simplify existing rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
To ensure uniform application and enforcement of the social rules in Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
To further harmonise working conditions in the sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
To further harmonize conditions of competition between operators	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
To ensure balance between the freedom to provide cross-border services and social protection rights of road transport workers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
To enhance cooperation between Member States in order to allow more effective cross-border enforcement	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please explain below)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Additional comments or suggestions?

*2000 character(s) maximum*

Based on its experience, ECFD would recommend the Commission to start by providing a flexible framework that would take into consideration sectoral specificities.

Feedback from ECFD members clearly demonstrates the need to grant the heating oil distribution sector a derogation from the application of daily and weekly rest periods during winter time. Such amendment to the directive would de facto harmonize Member States' recourse to article 14(2), and clarify how its provisions should be interpreted. Indeed, certain Member States use the article to alleviate the delays in heating oil deliveries caused by a combined effect of the strict applications of the Regulation and bad weather conditions. They therefore questionably consider that deteriorated weather conditions during winter qualifies as an "exceptional circumstance" or an "urgent case".

21. Which of the following specific measures would contribute to improving the functioning of the social rules in road transport?

	No contribution at all	Minor contribution	Moderate contribution	Major contribution	No opinion
Clarify the scope of EU legislation by explicitly excluding occasional non-professional drivers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Include drivers of vehicles below 3.5 tonnes in the scope of the driving and working time legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Explicitly forbid spending a regular weekly rest in a vehicle	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>Allow for spending a regular weekly rest in a vehicle provided that it is free choice of a driver</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Allow for taking every second regular weekly rest in a vehicle</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Allow for flexible distribution of minimum breaks and resting to adapt to specific transport services</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Clarify the requirement of recording mixed activities (driving in scope and out of scope of the legislation)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Forbid performance-based remuneration of drivers</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Exclude self-employed drivers from the scope of the working time directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Integrate the working time provisions with the provisions on driving and resting times (i.e. repeal the working time directive)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish maximum periods away from home/base	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Replace guidelines on common approach to implementation of the rules by legally binding rules	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish criteria for posting situation in road transport	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>Adapt the administrative formalities for posted workers to the specificities of road transport</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Establish national contact points to provide guidance on the application of the social rules applicable to transport</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Additional comments or suggestions for alternative measures to improve the legislative framework?**

*2000 character(s) maximum*

ECFD calls for a revision of the Regulation on driving times, breaks and rest periods that would provide more flexibility in implementation so as to satisfy some sectors' specific needs. Distributors of heating oil under the current provisions cannot increase their delivery capacity in winter, making some of their customers at risks of being left without heating during the coldest months of the year. Quite paradoxically, the current rules delay deliveries by imposing strict daily and weekly rest periods, to the detriment of customers.

ECFD members therefore encourages the Commission to revise the Regulation in a view to take into account the specificities of their sector. This could easily be achieved by adding a new exception to article 13(1) granting vehicles used to deliver domestic heating fuels the right to depart from some provisions under specific conditions. The derogation to the daily and weekly rest periods rules would apply to certain type of vehicles, defined perimeter and limited timeframe in order to maintain a high level of social rules. Competition would not be affected as all heating fuel distribution companies use the same kind of vehicle. Safety of deliveries would be increased as drivers would be able to make more deliveries during a period where daytime is reduced, limiting risks related to filling tanks, dragging hoses and driving in the dark.

22. Which of the following specific measures would contribute to improving enforcement of the social legislation?

	No contribution	Minor contribution	Moderate contribution	Major contribution	No opinion
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Clarify the liabilities of all actors in the transport chain as regards infringements of the social rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Establish common initial and continuous training of enforcers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Issue legally binding rules for enforcers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce the scope of roadside checks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase number and scope of checks at premises of undertakings	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the number of joint cross-border checks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Discontinue the form for attesting driver's activities when away from the vehicle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Oblige drivers to register the country code in a tachograph when crossing borders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish minimum requirements for regular exchange of data and information between Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish uniform minimum requirements for types and levels of penalties	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonize tools used by enforcers for control purposes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use (existing or new) enforcement networks or bodies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonize national risk rating systems, to allow for comparability and data exchange between Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Allow access of controllers to data in national risk rating system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Further expand a common classification of serious infringements of the social rules applicable to road transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Establish uniform minimum requirements for checking compliance with the working time provisions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promote the use of the GNSS digital tachograph system, to make enforcement more efficient, and less burdensome for compliant operators	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Additional comments or suggestions for alternative measures to improve enforcement?

*2000 character(s) maximum*

23. Could those of the above measures which in your view can contribute to improving the EU legislation and its enforcement result in the following impacts?

	No contribution	Minor contribution	Moderate contribution	Major contribution	No opinion
Improved job attractiveness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Growth and job creation in the sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reduced operating costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduced compliance costs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lower burden on small operators and self-employed drivers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fairer competition with transport services using small vehicles (less than 3.5 tonnes)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better working conditions/work life-balance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved health and safety for drivers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved road safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Others (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Additional comments or suggestions for other economic, social, environmental, or other positive and negative impacts?

*2000 character(s) maximum*

## Section 4: Subsidiarity and EU added value

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In any policy initiative, the Commission must consider whether there is added value in EU intervention and whether the level of EU intervention is appropriate, i.e. whether certain issues should be regulated at EU level or should be left for possible regulation at the Member State level.

24. How can the following objectives be most effectively achieved in the EU road transport sector?

	Primarily by EU legislation	Primarily by national legislation	No opinion
Social protection rights of road transport workers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Fair competition between operators	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Freedom to provide transport services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improved road safety levels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Additional comments?

*2000 character(s) maximum*

25. What would be the additional value resulting from the EU intervention compared to what could be achieved by Member States at national levels

	No added value	Minor added value	Moderate added value	Major added value	Don't know
Administrative cooperation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Legal certainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Greater effectiveness in solving identified problems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Greater efficiency in solving identified problems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lesser regulatory costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Consistent enforcement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please specify "Other"

*100 character(s) maximum*

26. What would be the most likely consequences of not taking any EU intervention?

	Very unlikely	Rather unlikely	Rather likely	Very likely	Don't know
Development of diverging national measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
High regulatory burdens	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Unequal treatment of drivers and operators as regards checks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Distortions of competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Deteriorating working conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Fragmentation of the single road transport market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please specify "Other"

*100 character(s) maximum*

No flexibility granted to meet sectors' specific needs will keep on affecting negatively customers.

**Useful links**

[About this consultation \(http://ec.europa.eu/transport/modes/road/consultations/2016-social-legislation-road\\_en.h](http://ec.europa.eu/transport/modes/road/consultations/2016-social-legislation-road_en.h)

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