Mr Frans Timmermans  
Executive Vice-President  
of the European Commission

Executive Vice-President,

We, the undersigned ministers responsible for transport of Bulgaria, Cyprus, Estonia, Hungary, Latvia, Lithuania, Malta, Poland and Romania, would like to take this opportunity to congratulate you on your appointment as Executive Vice-President responsible for the European Green Deal of the European Commission.

The European Green Deal communication (December 11, 2019) refers explicitly to transport as a sector with constantly growing emissions resulting from economic development and rising mobility needs of citizens and businesses. Therein, a set of measures is proposed to ensure that transport contributes to a climate neutral economy by 2050, including principally through a strong boost for multimodal transport and the optimized use of all transport vehicles and vessels.

In this context, we welcome the European Commission’s commitment to conduct an impact assessment regarding some elements of the provisional agreement on Mobility Package I (the Agreement). In its statement of December 20, 2019, the Commission rightfully noted that ‘the compulsory return of the vehicle to the Member State of establishment every 8 weeks and the restrictions imposed on combined transport operations are not in line with the ambitions of the European Green Deal’. This statement is in line with the positions presented by our countries during the legislative process. Throughout this process, we consistently called for an impact assessment at the EU level of those provisions as we believed that they may negatively impact both the environment and the Single Market.

In particular, the obligation for the vehicle to return to the country of establishment, introduced in the Agreement at the request of the European Parliament, contradicts the EU’s climate policy objectives and the Paris Agreement goals and will result in additional empty runs and CO₂ emissions from the road transport sector. Importantly, the provision limits the geographical area of operations for road transport undertakings to the vicinity of the Member State of establishment, undermining the Single Market by disproportionately restricting the access of these operators because of their geographical location and effectively excluding island Member States.

National studies show that the return of the vehicles will result in additional empty runs and, by extension, in extra CO₂ emissions from the road transport sector per year. These analyses are, nevertheless, fragmented, refer mostly to the national level and do not measure fully the impact across the entire EU. Therefore, the follow-up on the Commission’s initiative which will measure the impact of the new proposal at the European level is truly necessary.

Moreover, we are of the opinion that such Impact Assessment should not only focus on the two elements indicated in the Commission’s statement of December 2019, but should be extended to other elements of the Agreement that proved to be deeply controversial during the legislative process and which may also increase carbon footprint of the transport sector. These include, among others, restrictions on cabotage or limitations concerning multiple loading/unloading operations (multi-drop operations). None of these has been assessed in terms of their impact on the road transport sector, climate or environment. The EU simply cannot risk adopting measures that might bring more negative than positive effects on the European transport sector.
With a view to the adoption of the Agreement by the Council and the European Parliament, we would like to ask you to take concrete steps as the Vice-President of the European Commission responsible for the implementation of the European Green Deal, to avoid the introduction of provisions in Mobility Package I that are not only contradictory to EU’s climate policy, but also undermine the equitable participation of Member States in the Single Market and are very harmful to the European road transport sector.

Yours sincerely,

Rossen Jeliazkov
Minister of Transport, Information Technology and Communications of the Republic of Bulgaria

Yiannis Karousos
Minister of Transport, Communications and Works, Cyprus

Taavi Aas
Minister of Economic Affairs and Infrastructure, Estonia

László Mosóczi
Minister of State for Transport, Hungary

Tālis Linkaits
Minister for Transport and Communications of the Republic of Latvia

Jaroslav Narkevič
Minister of Transport and Communications, Lithuania

Ian Borg
Minister for Transport, Infrastructure and Capital Projects, Malta

Andrzej Adamczyk
Minister of Infrastructure of the Republic of Poland

Lucian Nicolae Bode
Minister of Transport, Infrastructure and Communications, Romania

CC:
- Mr David Maria Sassoli, President of the European Parliament
- Ms Adina Ioana Vălean, European Union’s Commissioner for Transport