



POSTED WORKERS AND THE MOBILITY PACKAGE

Challenges for Enterprises



WHO IS ITD?

ITD

Association for the Danish road transport of goods

- Established in 1948
- Development from covering international hauliers only, to covering the whole transport industry

The subsidiaries FDE and Vialtis are European market leaders in VAT and TMF.

Employees

- ITD & ITD Holding A/S: 72
- FDE & Vialtis: 194



ITD AND THE BUSINESS

- 812 member companies (*week no 39, 2017*)
- The member companies control approximately 17,000 trucks
- ITD covers approximately 2,500 Danish transport companies as customers



THE EUROPEAN UNION



A PART OF THE ITD MEMBERS HAVE BEEN INTERNATIONALIZED

- 15 per cent have subsidiaries abroad
- 2,500 trucks are registered abroad

Source: ITD Member Survey 2014



The Commission proposal for a *lex specialis*

Article 2

This Article establishes specific rules as regards certain aspects of Directive 96/71/EC relating to the posting of drivers in the road transport sector (...)

Member States shall not apply points wage – and holidays rules when performing international carriage operations where the period of posting to their territory to perform these operations is shorter than or equal to 3 days during a period of one calendar month.

The calculation of the periods of posting:

(a) a daily working period shorter than six hours spent in the territory of a host Member State shall be considered as half a day;

(b) a daily working period of six hours or more spent in the territory of a host Member State shall be considered as a full day;

(c) breaks and rest periods as well as periods of availability spent in the territory of a host Member State shall be considered as working period.



The Commission proposal for a *lex specialis*

What is the problem and why is it a problem?

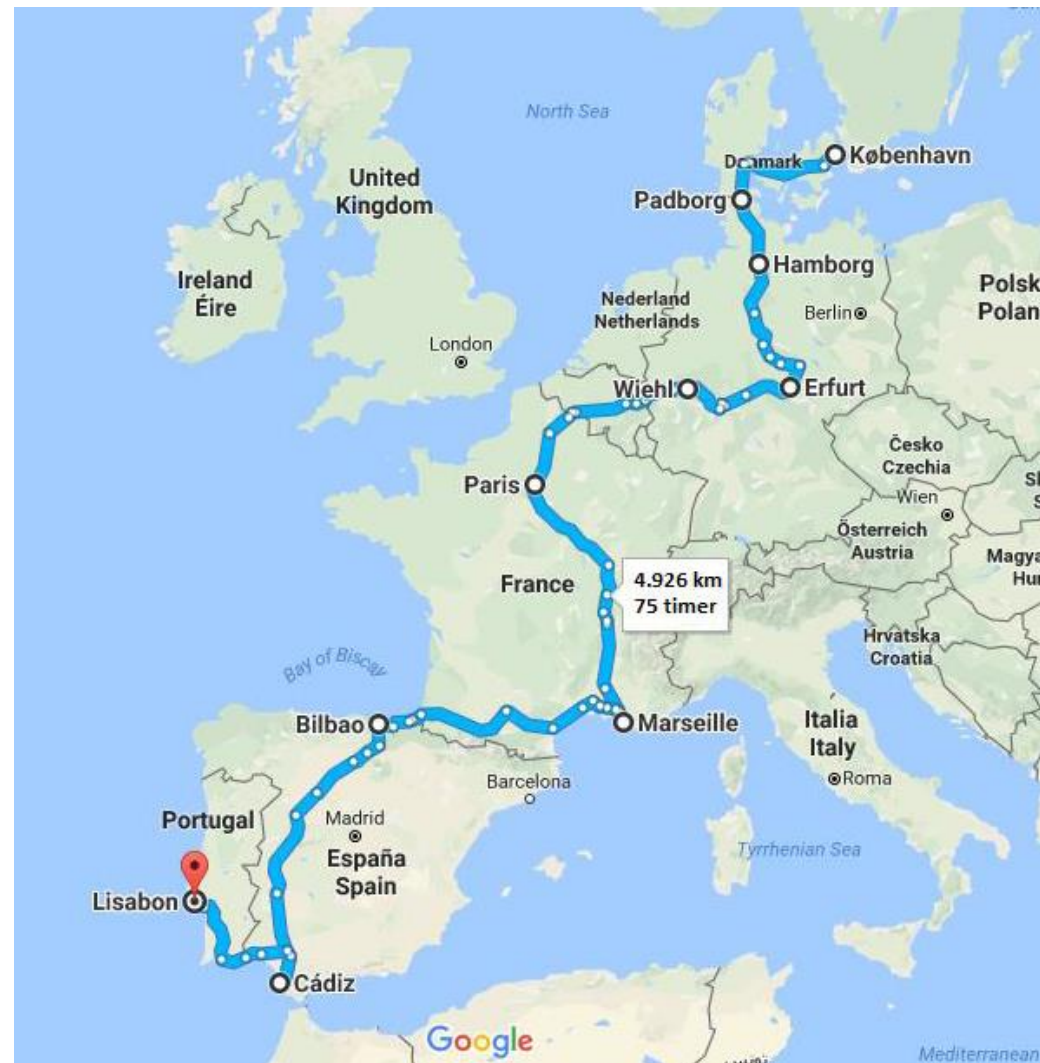
- Legal premise and principle of proportionality
- Unenforceable rules to drivers, companies and authorities
- Counter-productive measures

PWD impact on international transport operations

Copenhagen – Padborg –
Hamburg – Erfurt – Wiehl –
Paris – Marseille – Bilbao –
Cadiz – Lisbon

Distance: 4.926 km

Driving time: approximately
75 hours (congestion,
loading/unloading and other
things excluded)





PWD impact on international transport operations

Lisbon – Madrid – München –
Amsterdam – Berlin –
Hamburg – Padborg –
Copenhagen

Distance: 4.834 km

Driving time: approximately
74 hours (congestion,
loading/unloading and other
things excluded)





Application of PWD to international transport operations

Consequence of the application of PWD

Below are the numbers of the average driving time, breaks, loading time, unloading time as well as rest periods on different parts of the trip ("effective hours" i.e. not calculating congestion time, other work, roadside checks etc.)

Outbound journey:

- Copenhagen-Padborg 8,25 h.
- Padborg-Wiehl: 43,5 h.
- Wiehl-ES border: 70,25 h.
- ES border-Lisbon: 71,5 h.

Return journey:

- Lisbon-ES border: 13,5 h.
- ES border-FR border: 26,5 h.
- FR border-DE border: 40,5 h.
- DE border-NL border: 76,25 h.
- NL border-DE border: 9, 25 h.
- DE border-Padborg: 40,5 h.
- Padborg-Copenhagen: 12,25h.



A mutual effort against the application of PWD to international transport

A mutual declaration between transport & logistics associations and chambers of commerce from Bulgaria, Croatia, the Czech Republic, Denmark, Estonia, Greece, Hungary, Ireland, Latvia, Lithuania, the Netherlands, Poland, Portugal, Romania, Slovakia, Spain and the United Kingdom has recently been signed to oppose the symbolic, bureaucratic and unenforceable proposal made by the Commission.

The declaration is open to anyone who wants to join our mutual effort against the application of posting rules to international transport operations.



Thank you for your attention!

Any questions?