

# EU POSITION- AND STRATEGY PAPER

2025 - 2029



# Preface



The **Federal Transport Division of the Austrian Federal Economic Chamber** is the legal representative of the interests of all 40,000 Austrian transport and logistics companies. We represent the following sectors: Freight transport, railway, bus, taxi and hire car companies, aviation, shipping, cable cars, freight shipping and logistics, driving schools and garage and petrol station companies. The companies operate in all modes of transport and employ over 200,000 people in Austria. The gross value-added amounts to 14 billion euros annually

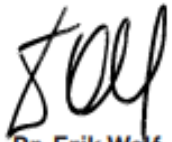


Both our member companies and their European competitors are facing considerable challenges in view of the uncertain global economic and geopolitical situation. As both the Letta report on the future of the single market and the Draghi report on European competitiveness attest, inconsistent regulations and technical standards in Europe, a sprawling reporting system, the defossilization of the (mobility) economy, high energy prices, labor shortages, partial deindustrialization, failures in digitalization and infrastructure expansion as well as China's increasing presence in Europe pose serious threats to European competitiveness. Added to this is the USA, which has recently become increasingly protectionist.

To ensure that Europe's businesses remain competitive in the face of this situation and can operate sustainably in the long term, European policymakers need to create the appropriate framework conditions. Our appeal to European decision-makers therefore includes, among other things:

- ❖ **Terminal Strategy:** Minimum standards for UCT terminals, extension of operating hours
- ❖ **Energy Roadmap:** Technological openness and commitment to importing renewable energy
- ❖ **Infrastructure expansion:** EU infrastructure fund to safeguard strategic logistics, expansion of European port infrastructure
- ❖ **Digitalization & Innovation:** One-stop digital store, abolition of the EU control document, digital automatic coupler and European train control system
- ❖ **Labor shortage:** Employment of drivers from non-EU countries

  
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|                                       |                                                                                     | Subject Area                                                     | Top Proposals                                                                                                                                                                                                                  |
|---------------------------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Future, Strategy and Energy           |    | <a href="#"><u>European Terminal Strategy</u></a>                | Minimum standards for space, capacities, operating times, cost and price for the unaccompanied combined transport (UCT)<br>Extension of operating hours to 24/7<br>Promoting new technologies and automation                   |
|                                       |    | <a href="#"><u>EU-Infrastructure Fund&amp;Port expansion</u></a> | EU infrastructure fund to safeguard strategic logistics<br>Flexibility in fiscal rules for infrastructure projects                                                                                                             |
|                                       |    | <a href="#"><u>Danube Navigation Channel Maintenance</u></a>     | Discharge depth of 25 dm available all year round at regulatory low water in the Danube waterway<br>European authority with executive powers to remedy infrastructure deficiencies more efficiently                            |
|                                       |    | <a href="#"><u>Labour shortages</u></a>                          | Practice of the driving profession in the training phase<br>Modernize the minimum age for all modes of transport<br>Employment of drivers from third countries                                                                 |
|                                       |    | <a href="#"><u>Energy Roadmap EU</u></a>                         | Development of a European energy roadmap<br>Commitment to importing renewable energy<br>Alternative fuels - openness to technology<br>Hydrogen as a solution for the future                                                    |
|                                       |  | <a href="#"><u>RED III - Expansion of renewable energy</u></a>   | Detailed sector targets inhibit flexibility<br>Consideration of other climate-neutral forms of energy for security of supply                                                                                                   |
|                                       |  | <a href="#"><u>Count Emissions</u></a>                           | Consideration of subcontractors in the accounting of GHG emissions<br>Clear rules for verification of data                                                                                                                     |
|                                       |  | <a href="#"><u>Fleet limits</u></a>                              | Use of alternative fuels<br>Openness to technology<br>Rejecting the ban on combustion engines for cars                                                                                                                         |
|                                       |  | <a href="#"><u>Defossilization</u></a>                           | Using Ukraine's pipelines for hydrogen<br>Promotion of SAF and eFuels<br>Expansion of the EU hydrogen infrastructure<br>Inclusion of the fuel in infrastructure tolls<br>Mobilising green finance for the transport transition |
| Infrastructure and Combined Transport |  | <a href="#"><u>Greening Corporate Fleets</u></a>                 | No obligation to purchase zero-emission vehicle fleets                                                                                                                                                                         |
|                                       |  | <a href="#"><u>TEN</u></a>                                       | Timely completion of the TEN-T network<br>Coordination of construction measures<br>Keeping alternative routes free in the event of disruptions                                                                                 |
|                                       |  | <a href="#"><u>Combined Transport</u></a>                        | Review of alternative methods for defining combined transport<br>Clear specifications for the rail compatibility of road vehicles<br>Inbound and outbound routes by regional providers with zero-emission vehicles             |

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|--------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Harmonization & digitalization |    | <a href="#"><u>Aviation / SES II +</u></a>                                           | Promoting the market maturity of SAF<br>No bans on short-haul flights<br>Closer cooperation between national supervisory authorities & various FABs desired                                                                |
|                                |    | <a href="#"><u>Cross-border traffic</u></a>                                          | Clear road for EU license plates                                                                                                                                                                                           |
|                                |    | <a href="#"><u>Pollutant classes</u></a>                                             | EU-wide standardization of stickers for marking pollutant classes (for pollutant zones) from factory                                                                                                                       |
|                                |    | <a href="#"><u>Multiple penalties</u></a>                                            | Harmonization of criminal practices throughout Europe<br>Moving away from rigorous punishment                                                                                                                              |
|                                |    | <a href="#"><u>Tachographs</u></a>                                                   | EU-wide harmonized rules on tolerance for minor infringements                                                                                                                                                              |
|                                |    | <a href="#"><u>Digitalization</u></a>                                                | European “one-stop digital store” for vehicle-related documents<br>EU-wide abolition of the EU driver's logbook                                                                                                            |
| Driving and rest times         |   | <a href="#"><u>Driving and rest times: Bus tourism</u></a>                           | Postponement of the daily rest period<br>More flexible distribution of driving breaks                                                                                                                                      |
|                                |  | <a href="#"><u>Construction site traffic: Exceptions to driving/rest periods</u></a> | Tolerance for special events, such as traffic jams or detours<br>Exceptions for construction site traffic                                                                                                                  |
|                                |  | <a href="#"><u>Rest period in the driver's cabin</u></a>                             | Ensuring 5-star parking facilities instead of the obligation to leave the cabin                                                                                                                                            |
| Weights                        |  | <a href="#"><u>Weights &amp; dimensions</u></a>                                      | Adjustment of the maximum permissible gross weight for vehicles with alternative drive systems<br>Maximum axle load as basis for calculation<br>Higher weight limit for craneable semi-trailers outside combined transport |
|                                |  | <a href="#"><u>Weight adjustments for vans</u></a>                                   | Adjustment of the maximum permissible gross weight for light vans with alternative drive systems                                                                                                                           |
| Relief                         |  | <a href="#"><u>Administrative expenses</u></a>                                       | Truck and bus drivers: Combination of initial qualification and driving license<br>No obligation to provide historical data for multimodal travel information services<br>Supply chain policy and sustainability report    |
|                                |  | <a href="#"><u>Freedom of choice in awarding contracts (PSO)</u></a>                 | Freedom of choice between direct award and competitive tendering in PSO regulation must be maintained                                                                                                                      |
|                                |  | <a href="#"><u>Easing regional burdens - Geoblocking</u></a>                         | Relieving the burden on regions through local rates                                                                                                                                                                        |

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|----------|-----------------------------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Railways |  | <a href="#"><u>Guidelines &amp; Block Exemption Regulation</u></a>      | <p>Increasing the aid intensity in the guidelines</p> <p>Preservation of the aid category “use of infrastructure”</p> <p>Direct subsidies for new technologies</p> <p>Promotion of multimodal terminals and private railway siding projects</p> |
|          |  | <a href="#"><u>Track capacity and expansion of the rail network</u></a> | <p>Continuous train journey</p> <p>Reduction of traction Electricity costs</p> <p>Efficient coordination of track capacity planning</p> <p>Harmonized reporting on construction work</p>                                                        |
|          |  | <a href="#"><u>Successful night train</u></a>                           | <p>Reduction of tolls for night trains and introduction of a night segment</p> <p>PSO support</p>                                                                                                                                               |
|          |  | <a href="#"><u>Innovations in rail freight transport</u></a>            | <p>Digital Automatic Coupling (DAK): EU-wide company-friendly introduction</p> <p>European Train Control System (ECTS): EU-wide introduction in a way that is compatible with existing companies</p>                                            |

## Future & Strategy

### 1. European-Terminal Strategy

**Legal act / status of legislative process:** “Directive on combined transport of goods”, proposal to amend Regulation 2020/1056 and Directive 92/106/EEC - COM (2023) 702, neither the Council's general approach nor the Parliament's committee report are available, procedure number: 2023/0396/COD

#### I. General remarks:

Unaccompanied Combined Transport (UCT) uses road and rail as modes of transport according to their inherent strengths, namely rail as a means of transport over long distances and road over short distances in flexible collection and fine distribution, thus contributing to a reduction in CO2 pollution. In order to create a basis for the quality and efficiency of UCT, certain minimum requirements must be set for the infrastructural, operational and financial aspects of transport. These standards should ensure that certain facilities are sufficiently dimensioned, have adequate capacity, are available around the clock and can be used at transparent and competitive costs and prices.

#### II. Proposals:

- **EU-wide standardized and harmonized specifications**

In order to increase the efficiency of UCT, standardized and harmonized requirements should be introduced across the EU. This would help to reduce the complexity of the UCT system and improve interoperability between different countries and regions.

Logistics is unthinkable without information technology. A system such as combined transport, in which a large number of partners are involved, requires efficient IT solutions from every link in order to guarantee the quality of all processes. There is a great need for improvement for combined transport in this area in particular. Despite good solutions and examples of successful projects, the lack of consistency in the systems is particularly problematic. As there are no consistent systems, combined transport cannot fully exploit its potential for its customers..

- **Extension of operating hours to 24/7**

In order to meet the needs of customers and train schedules, the operating hours of terminals within the EU should be extended. An extension to 24/7 hours would avoid peaks in capacity utilization and lead to a more efficient business location in Europe.

- **Greener terminals**

The use of low-emission or emission-free drives for handling equipment, such as electric, LNG, CNG or hydrogen engines, must be promoted at European level. The use of advanced control systems and their integration into the Terminal Operating

System (TOS), which lead to a reduction in the energy consumption of handling equipment, should also be promoted. Without support, the costs for the transition to these technologies are often too high for terminal operators.

- **Expand terminal capacities and areas**

The capacity of a UCT terminal depends on various factors, such as the number and length of tracks, the number and type of handling facilities, the number and size of parking spaces and the number and quality of access routes. In principle, the area of a UCT terminal should be at least 10 hectares; for large and especially trimodal terminals in economically important regions, the area should be at least 50 hectares. Ideally, the area should be expandable to meet future demand.

- **Promoting new technologies and automation**

There are a number of new technologies (such as craneable semi-trailers, reach stackers and gantry cranes) and new loading systems (such as Modalohr and Cargobeamer, which enable the horizontal loading and unloading of semi-trailers and articulated lorries) that help to automate and optimize processes at transshipment points. These must be promoted as much as possible and harmonized at European level. In addition, the automation of terminal operations through the use of semi-automatic and fully automatic equipment such as Automated RTG, Automated RMG and Automated TT should be promoted at European level.

## 2. EU-Infrastructure Fund & Port Expansion

### I. General remarks:

For the period of the Multiannual Financial Framework (MFF) 2021-2027, Regulation (EU) 2021/1153 established the Connecting Europe Facility for 2021-2027 (CEF 2.0).

The budget (at 2021 prices) is broken down as follows:

- **Transport: 25,81 billion euros** (including 11.29 billion euros transferred from the Cohesion Fund)
- **Energy: 5,84 billion euros**
- **Digital: 2,07 billion euros**

For the 2014-2020 period, **29.4 billion euros** were made available for the Trans-European Networks (TENs), with **24 billion euros** earmarked for the transport sector (TEN-T) and **5.4 billion euros** for the energy sector (TEN-E). This amount has mostly been invested directly by member states in infrastructure projects within the framework of the European guidelines.

#### **Danger of increasing Chinese investment in Europe**

Simultaneously, Chinese companies in particular have been investing in a wide range of critical infrastructure in Europe, including ports, airports and electricity companies. A study identified 24 Chinese acquisitions and 13 announced greenfield investment projects in European maritime infrastructure from 2004 to 2021<sup>1</sup>.

China Ocean Shipping Company (COSCO) and China Merchants were the leading investors. Shanghai Zhenhua Heavy Industries Company Limited (ZPMC) is the main supplier of ship-to-shore cranes for European harbors.

In the area of non-maritime transport infrastructure, financial commitments are made in particular as part of China's "Belt and Road" initiative. Further influence is gained through the provision of services along transport routes.

These investments are attractive because they entail the modernization and expansion of port and terminal capacity. However, they also harbor **considerable risks** (dependency risk; cyber/data protection risk; economic coercion and geopolitical risks). It is essential that European infrastructure remains European to guarantee safety, a high standard of quality and geopolitical independence.

The EU should better protect its interests and those in its neighborhood by supporting investment in transport infrastructure in these regions, especially in the countries with candidate status and within the framework of European territorial cooperation (InterregEurope countries). However, financial support should be combined with stricter

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<sup>1</sup> [https://www.europarl.europa.eu/thinktank/de/document/IPOL\\_STU\(2023\)747278](https://www.europarl.europa.eu/thinktank/de/document/IPOL_STU(2023)747278);  
[https://www.europarl.europa.eu/thinktank/de/document/IPOL\\_STU\(2023\)747279](https://www.europarl.europa.eu/thinktank/de/document/IPOL_STU(2023)747279).



conditions in terms of investment control, maximum transparency of investment agreements and stricter enforcement of labor, environmental and other standards.

## **II. Proposals:**

- **Independent financing instrument for European infrastructure protection umbrella (infrastructure fund)**

To better protect important European transport infrastructure, an independent financing instrument (infrastructure fund) based on the Connecting Europe Facility mechanism should be created in order to counterbalance Chinese infrastructure investments and influence.

- **More flexibility in the European Union's fiscal rules**

The European Union's fiscal rules must not hinder important infrastructure projects. The newly published guideline for Member States on information requirements in the context of medium to long-term financial and structural plans makes it clear that the national co-financing of infrastructure projects supported by the CEF does not fall under the Maastricht regime. This step is expressly welcomed. However, this step should also be extended to important infrastructure projects, for example in the area of military mobility, high-speed rail transport, the creation, maintenance and renewal of railroad infrastructure and the expansion and modernization of port and terminal infrastructure..

### 3. Coordination of maintenance measures for the navigation channel on the entire Danube

#### I. General remarks:

It is currently not possible to optimise the capacity utilisation of cargo ships on the Danube waterway. Expanding the navigability and increasing the competitiveness of the Danube as a waterway is not only of great regional importance, but also of European significance.

The Danube is naturally susceptible to fluctuations in water levels caused by weather conditions such as heavy rainfall or dry periods. These fluctuations can affect the availability of the navigation channel and hinder transport. Companies are faced with the challenge of keeping shipping on the Danube competitive with other modes of transport. If the navigation channel is not adequately maintained and transport difficulties arise, companies may be forced to switch to other transport routes such as road or rail, resulting in additional costs.

#### II. Proposals:

- **Year-round guarantee of 25 decimetres for regulation low water**

To increase competitiveness, an unloading depth of 25 decimetres should be guaranteed all year round at regulatory low water. This is because a low water level can affect the maximum loading of ships and lead to bottlenecks in transport. A constant unloading depth is therefore crucial to ensure efficient capacity utilisation of cargo ships.

- **European authority with executive powers to remedy infrastructure deficiencies more efficiently**

We are calling for maintenance work to be carried out more quickly and for infrastructure deficiencies along the Danube waterway to be rectified more efficiently. Unfortunately, it happens again and again that impairments by other Member States are only remedied slowly. There is a lack of an effective European authority with executive power to ensure that the impairments are remedied quickly and that the Danube is continuously navigable for companies. This authority would be able to monitor the established fairway parameters in the Danube region and define and enforce consequences in the event of non-compliance with binding agreements. The creation of such an institution is of crucial importance to ensure smooth navigation and navigability on the Danube

- **Promotion of European and international co-operation**

We would welcome it if the European Commission were to take supportive action to promote international cooperation between all parties in order to ensure the navigability of the entire Danube route. The financial requirements for the implementation of the Danube Action Programme must be taken into account in the budget on an ongoing basis.

#### 4. Labour shortage in the mobility sector

**Legal act / status of legislative process:** The Professional Drivers Directive (Directive 2022/2561) has been in force since December 2022. / The provisional trilogue agreement for an amendment to the Driving Licence Directive took place on 25.03.2025, procedure number: 2023/0053/COD / The Directive on the certification of train drivers (Directive 2007/59/EC) was last amended in 2019.

##### I. General remarks:

Well-trained employees are the calling cards of every company and contribute to the overall success of the company and subsequently to the quality of the business location. The qualifications and expertise of employees are increasingly becoming a decisive competitive factor, particularly in the areas of mobility, transport and traffic. In recent years, there has been a growing shortage of labour in the mobility sector across Europe. According to the results of an IRU survey, there is a shortage of around 425,000 drivers across Europe. The age structure of existing drivers (with many imminent retirements) in Austria also points in this direction.

In order to support the mobility and transport sector as an important foundation of the economy and society with sufficient qualified labour, various measures are therefore necessary, including a change to the Professional Drivers Directive (e.g. a more straightforward entry into the profession, a reduction in bureaucracy and better framework conditions).

With regard to the amendment of the driving licence directive, we welcome the fact that the trilogue partners have reached a provisional agreement on the amendment of the driving licence directive, which brings a number of improvements. In particular, we are in favour of allowing accompanied driving of HGVs from the age of 17 under certain conditions, the possibility of driving alternatively powered vehicles up to 4.250t with a category B licence and the fact that the introduction of mandatory health checks has been rejected. However, in order to enable standardised framework conditions and fairer competition, further significant changes need to be implemented

##### II. Proposals

- **Minimum age for train drivers**

A key measure to combat the labour shortage in local public transport would be to reduce the minimum age of train drivers to 18 across the EU. Directive 2007/59/EC currently stipulates a minimum age of 20 years, from which Member States can only deviate on their own territory.

- **Minimum age for bus drivers**

When the driving licence directive was amended, the aspect of the minimum age for passenger transport was regrettably neglected. No steps were taken to tackle the increasingly serious problem of driver shortages here either. In any case, further

tightening is necessary here. The aim should be to harmonise the minimum age for commercial bus drivers (D95 and DE 95) with the age of 18 for lorry drivers

- **Accompanying lorry driving from the age of 17**

It is very pleasing that the European Commission has taken up our suggestion on L17 for category C in the Commission proposal and is making accompanied driving possible for drivers who have reached the age of 17. Unfortunately, the mandatory introduction was watered down to an "optional provision" in the provisional trilogue agreement.

We therefore propose, after an evaluation period, the harmonised introduction of a mandatory requirement throughout the EU. We consider this option to be a significant impetus for the recruitment of lorry drivers.

- **Employment of drivers from third countries**

Creation of seasonal quotas for the rapid and unbureaucratic employment of foreign labour in the freight transport sector .

- **Prospective professional drivers without an initial qualification (only on the basis of a driving licence) should be able to exercise the profession for one year if the initial qualification is completed in this first year**

Access to the profession should not be made any more difficult. We propose that prospective drivers should be able to work in the profession for one year without an initial qualification (only on the basis of a driving licence) and that the initial qualification should be completed in this first year. This would result in more interest in the driving profession and make it easier to enter the profession

- **Consider special features of e-learning for professional drivers**

We welcome the possibility explicitly included in EU Directive 2022/2561 of voluntarily completing further training content via e-learning. Unfortunately, the specific legal structure in the directive is not very practical and should be adapted accordingly to the special features of e-learning: For example, the general requirement that a further training module can be completed within 2 days ignores the advantages of e-learning as a form of learning; namely that the learning material of a module can be learnt and repeated in smaller sections over a longer period of time (e.g. 3 months)

## 5. European Energy Roadmap - Strategic energy supply planning

**Legal act / status of legislative process:** EU strategies and legal acts on energy to date

- Communication from 2025: Action plan for affordable energy
- Communication from 2024: Recommendation to achieve climate neutrality by 2050 COM(2024) 63 - new milestone: GHG reduction of 90% by 2040 compared to 1990 levels
- RePowerEU ab 2022 (KOM(2022) 108): as a result of Russia's invasion of Ukraine, four pillars for energy supply: Energy savings; diversification of energy supply; renewable energy; financing
- Fit-for-55-Paket ab 2021: GHG reduction target of 55% by 2030; package also relates to "clean energy": Renewable Energy Directive (RED), Energy Efficiency Directive, Gas Package, Building Efficiency Directive
- EU climate protection law from 2021 (VO 2021/1119): Net zero target by 2050 in the EU
- European Green Deal aus 2019 (COM(2019) 640): Net zero target by 2050 in the EU
- Communication from 2018 (COM(2018) 773) with strategic long-term vision "A clean planet for all": eight scenarios and seven strategic building blocks on the way to the net-zero GHG target by 2050, including one on clean mobility
- Energy Roadmap 2011 (COM/2011/0885): Precursor strategy (target of reducing GHG emissions by 80% to 90% by 2050 compared to 1990 levels), which describes how the EU's energy system can be largely decarbonised by 2050; four main decarbonisation paths: energy efficiency, renewable energy, nuclear energy and CCS.

### I. General remarks:

The defossilisation of transport requires a far-reaching transformation, away from fossil fuels and towards alternative drive systems and green fuels. The mobility transition cannot succeed without an energy transition. The necessary framework conditions must be created for this. A sustainable energy supply must be ensured, alternative infrastructure must be expanded and secure and resilient electricity grids must be guaranteed by expanding the grid. From the point of view of the transport industry, it is important that green energy (electricity, fuels) is available and affordable for companies. If energy costs cannot be planned, it is simply not possible for companies to operate sustainably. This is why European legislators need to be pragmatic and flexible, including when it comes to climate targets. Just as EU Climate Commissioner Hoekstra has already called for. Openness to technology must be the order of the day

## I. Proposals:

When considering how the EU's energy system can be largely defossilised by 2050, the transport industry believes that particular attention should be paid to the following aspects:

- **European-Energy-Roadmap**  
In order to create alternatives for companies switching to non-fossil fuels, a European Energy Roadmap should set out when which quantities of fossil fuels are to be replaced by renewables and at which target price corridor..
- **Expansion of renewable energies - energy imports**  
The energy transformation requires a massive expansion of renewable energies. The electrification of industry, mobility and other sectors will lead to an enormous increase in demand for green electricity, which Europe will not be able to produce on its own despite the expansion of renewables. Energy imports will therefore be necessary. There are much more effective and profitable locations worldwide for the production of wind and solar power than in Europe, especially in the Middle East, North Africa, etc. The primary energy produced there can be converted into energy carriers such as methane or synthetic fuels and stored and transported to Europe in this way. Imported e-fuels and LNG/CNG can be used in particular for the defossilisation of heavy goods transport as a transitional technology
- **Alternative Kraftstoffe - Technologieoffenheit**  
From the perspective of the transport industry, it is an absolute necessity to exhaust all possibilities for defossilisation. In reality, transport requires a bundle of measures (hydrogen, e-mobility, synthetic fuels, e-fuels, etc.). Although electromobility in the transport sector is important, it is only part of the solution. In areas where electric drives are difficult to implement, hydrogen, synthetic fuels (e-fuels), LNG, CNG and biofuels can make a valuable contribution to reducing CO<sub>2</sub> emissions in transport. These alternatives are also important for existing fleets with combustion engines and must remain eligible for the fulfilment of fleet targets for HGVs. In line with the maxim of technological openness, alternative fuels (e-fuels, H<sub>2</sub>, biofuels) must be given greater recognition for the defossilisation of transport
- **Hydrogen as a solution for the future**  
From the perspective of the transport industry, hydrogen mobility is a promising approach to defossilising heavy goods transport and is also relevant for the production of sustainable aviation fuels (SAF), which are essential for green aviation. Hydrogen mobility should therefore also be promoted more strongly at EU level. However, hydrogen as a future solution will require large quantities of green electricity and high levels of investment. However, the strict requirements of the Renewable Energy Directive (RED III) with regard to the additionality criterion (see [point 6. RED III](#)) for renewable hydrogen, which must be complied with, must be viewed critically, as climate-neutral and carbon-reduced hydrogen will probably also be necessary as bridging solutions for achieving our climate targets.
- **Infrastructure for hydrogen refuelling and hydrogen imports**  
A functioning infrastructure forms the backbone of hydrogen mobility. It is therefore important to ensure that the AFIR requirements for the hydrogen refuelling infrastructure are implemented quickly throughout the EU. In addition, infrastructure

projects such as the "SouthH2 Corridor" project - an infrastructure project for transporting hydrogen over 3,300 kilometres from North Africa to Europe - must be implemented and accelerated at all costs.

- Funding for the expansion of hydrogen infrastructure within the EU

- **Securing financing**

Infrastructure expansion (grid expansion) or new technologies such as hydrogen technology require high levels of investment. The European Hydrogen Bank is an important initiative to promote hydrogen production in Europe and the import of renewable hydrogen. EU funding instruments such as CEF Energy for the promotion of cross-border energy infrastructure are also to be welcomed. In addition to the optimal design of EU funding instruments, it is also important that EU instruments enable a meaningful interplay between EU funding and national funding. For example, the European Hydrogen Bank offers Member States the opportunity to use national funds for the auctions. This is an efficient way of providing operating support for national production facilities in line with the State Aid Directive. Austria has made its own budget funds available for such national auctions as part of its Hydrogen Promotion Act.

## 6. RED III - Expansion of renewable energy

**Legal act / status of legislative process :** Directive 2023/2413 was published in the Official Journal of the EU on 31 October 2023 .

### I. General remarks:

In order to become climate-neutral by 2050 - the EU Climate Law aims for net-zero greenhouse gas emissions by 2050 - Europe must transform its energy system from the ground up. With the Renewable Energy Directive (RED III), which came into force in the European Union on 20 November 2023, the EU increased the targets for the expansion of renewable energies. This EU directive requires member states to ensure that the share of energy from renewable sources in the EU's gross final energy consumption is at least 42.5 % by 2030 (previously this target was 32 %). Above and beyond this mandatory level, the Member States should endeavour to jointly achieve an overall Union target for renewable energy of 45%. The sector target for transport has also been increased. Member States have the choice between

- the binding target of reducing greenhouse gas intensity in the transport sector by 14.5 % by 2030 through the use of renewable energy sources, and
- the binding target of achieving a share of at least 29% renewable energy sources in final energy consumption in the transport sector by 2030.

A new binding sub-target for the transport transition includes a combination of electricity-based renewable fuels (RFNBOs) and advanced biofuels. This sub-target is 5.5 per cent, of which 1 per cent is to be covered by RFNBOs.

### II. Proposals:

- **Detailed sector targets in transport inhibit flexibility**

The rapid expansion of renewable energy is undoubtedly necessary on the path towards a climate-neutral energy system. However, detailed sector targets such as those for transport do not necessarily lead to improvements, but can also inhibit the flexibility of the member states. One example of this is the fact that contributions from the off-road sector (snow groomers) cannot be counted towards the transport target of RED III. As snow groomers, for example, are not counted as transport, there are no incentives for the use of renewable fuels in this area. For example, HVO100 for use in road vehicles is offered on the market at more favourable conditions due to its eligibility for the RED III transport target.

- **Affordable energy prices and the availability of renewable energy**

The competitiveness of transport companies should not be overlooked in this context. Affordable energy prices and the availability of renewable energy must be guaranteed in the course of the defossilisation of transport when transport companies switch to alternative vehicles.



- **Security of supply and other climate-neutral forms of energy**

As electricity is a volatile energy source and can only be stored to a limited extent, it is important that RED III also takes other climate-neutral forms of energy (gaseous and liquid) into account for security of supply.

- **No tightening of the principle of additionality**

It is to be welcomed that renewable hydrogen will play a greater role with the strengthening of renewable fuels of non-biological origin (RFNBOs). However, it is critical that the principle of additionality is being tightened during the necessary market ramp-up phase. This approach must be critically questioned, as hydrogen mobility in particular represents a promising solution for the defossilisation of transport in order to achieve climate neutrality, and its ramp-up can be delayed or hindered as a result.

## 7. Count Emissions EU

**Legal act / status of legislative process :** Proposal for a Regulation - COM (2023) 441, the plenary of the European Parliament adopted its position on 10 April 2024. The Council adopted its general approach on 4 December 2023, procedure number: 2023/0266/COD

### I. General remarks:

The Commission's proposal on the accounting of greenhouse gas emissions is part of the package on the greening of freight transport and aims to make the calculation of the carbon footprint of freight transport simpler and more accurate. The calculation of greenhouse gas emissions from transport services is thus to be harmonised and made transparent. It can be used for both passenger and freight transport and should enable transport users to make sustainable decisions.

The Council has made a number of amendments to the proposal, primarily aimed at

- avoid duplication of accounting rules for greenhouse gas emissions under several pieces of EU legislation,
- facilitate the implementation of the Regulation by SMEs
- establish comprehensive and accurate databases with default values for emission intensity and emission factors,
- to allow Member States to apply stricter rules for domestic transport, with the exception of transport carried out by SMEs.

This takes our concerns into account. This is because it can be assumed that SMEs will also be indirectly affected by the reporting obligations via their supply chain, even if they are not obliged to report themselves. The indirect inclusion in the corporate sustainability reporting obligation means that the methodology for calculating transport-related greenhouse gas emissions will become relevant for the vast majority of companies in future. This means that the quasi-voluntary nature could very quickly become a de facto obligation for SMEs. The planned simplifications for SMEs are therefore to be welcomed

### Demands of the Council

- Member States may require the use of primary data for transport operations that start and end on their territory. This applies to companies whose number of employees exceeds a certain threshold defined in national law. The requirement does not apply to cross-border transport operations, including transit operations through their own territory, and to SMEs.
- The Commission must finalise a central EU database with standard values for emission intensity within 42 months of the Regulation coming into force .
- Within 36 months of the regulation coming into force, the European Commission must develop a calculation tool for calculating greenhouse gas emissions .
- Under certain circumstances, output data generated by a company may also be disclosed after the provision of a transport service.

- One year before the Regulation comes into force, the European Commission must adopt guidelines to promote the widespread use of ISO 14083. This is intended to support SMEs in implementing the regulation.

## II. Proposals:

From the point of view of the transport industry, two weak points in particular still need to be addressed :

- **Regulation on the inclusion of subcontractors in the accounting of emissions**  
There is no clear regulation on how subcontractors are to be taken into account in the accounting of greenhouse gas emissions. Subcontracting is common in the transport sector. It must therefore be made clear that a large company that bases its reporting on primary data may use secondary data for small subcontractors. In most cases, small subcontractors are micro-enterprises that do not have the necessary expertise or resources to collect data and calculate and disclose their greenhouse gas emissions.
- **Regulation for checking the output data**  
The verification of baseline data is not yet sufficiently regulated. Once a company has calculated its greenhouse gas emissions, these must be verified by a conformity assessment body to ensure that they meet the requirements. The current text requires clarification regarding the role of conformity assessment bodies. We assume that it cannot be the intention that a confirmation with a "stamp" is required for each individual journey of a transport service provider that the emissions have been counted correctly. This should already be clear from the text of the regulation, which currently only stipulates that the Commission is to adopt rules for the verification procedure at a later date.
- **Regulation for a life cycle assessment**  
The calculation method should consider greenhouse gas emissions over the entire life cycle. This demand, which was made by the European Parliament at the beginning of 2024, is to be supported. CO<sub>2</sub> emissions generated during the production of materials must also be taken into account. If the production or recycling of a vehicle is included in the methodology, production-related CO<sub>2</sub> emissions from materials or components produced outside Europe are also taken into account. This approach makes it possible to comprehensively record and assess the environmental impact of transport. This can result in greater cost transparency, which can lead to more European components being demanded instead of those from outside the EU.

## 8. Fleet limits - technology neutrality instead of a ban on combustion engines

**Legal act / status of legislative process :** Regulation 2023/851 of 19 April 2023 amending Regulation (EU) 2019/631 as regards the tightening of CO<sub>2</sub> emission standards for new passenger cars and new light commercial vehicles .

Proposal for the amendment of Regulation (EU) 2019/631 setting CO<sub>2</sub> emission standards of 1 April 2025, procedure number: 2025/0070/COD

Regulation (EU) 2024/1610 of 14 May 2024 amending Regulation (EU) 2019/1242 as regards the tightening of CO<sub>2</sub> emission standards for new heavy-duty vehicles and the inclusion of reporting obligations, amending Regulation (EU) 2018/858 and repealing Regulation (EU) 2018/956.

### I. General remarks:

#### **CO<sub>2</sub> emission limits for passenger cars and light commercial vehicles**

EU Regulation 2023/851 of 19 April 2023 tightened CO<sub>2</sub> emission standards for new passenger cars and new light commercial vehicles. According to this, new passenger cars and light commercial vehicles must become emission-free from 2035. This effectively means the "end of the combustion car".

#### **CO<sub>2</sub> emission limits for heavy commercial vehicles (lorries and buses)**

Regulation 2024/1610 of 14 May 2024 provides for new emission limits for heavy commercial vehicles (trucks and buses). For new heavy commercial vehicles (with the exception of city buses), these provide for a 45% reduction in emissions from 2030, 65% from 2035 and 90% from 2040. In addition, a 100% reduction in emissions will apply to new city buses from 2035.

As part of the compromise to reach an agreement, it was negotiated to develop a methodology for the authorisation of heavy commercial vehicles that run exclusively on CO<sub>2</sub>-neutral fuels. This means that, in addition to electric and hydrogen lorries, lorries that run exclusively on e-fuels or biofuels will also be approved in future. The stricter CO<sub>2</sub> emission reduction requirements are intended to create incentives to increase the proportion of zero-emission heavy goods vehicles placed on the market in the Union. If such a methodology were to be developed, this would mean that zero-emission lorries and buses powered by electricity or hydrogen, for example, would make up an increasing proportion of manufacturers' offerings. Combustion engines would therefore decline over time.

At the beginning of March 2025, the Commission announced an amendment to the CO<sub>2</sub> standard regulation, which has now been adopted. Instead of an annual deadline within which the EU targets must be met, companies now have three years. Exceeding the CO<sub>2</sub> targets in one year is permitted if this is compensated for by overfulfilment in one or two other years. This means more room for manoeuvre for companies and more clarity without changing the agreed targets. Von der Leyen thus responded to the demands of the ailing automotive industry, which is threatened with considerable penalties if the annual deadlines are not met.

## II. Proposal:

- **Openness to technology**

When defossilising the transport sector, greater consideration must be given to the principle of technological openness. A ban on the internal combustion engine should be rejected, as the technology does not cause CO<sub>2</sub>, but the fuel does. In order to achieve the CO<sub>2</sub> reduction targets, a broad range of technologies and energy sources must be utilised. In addition to battery-powered electromobility, this also includes the use of hydrogen-powered vehicles and the use of modern combustion engines powered by biofuels, synthetic fuels or hydrogen. Each of these technologies will make its contribution, but in total a broad technology portfolio is needed.

- **Use of alternative fuels in the combustion engine**

Biofuels and synthetic fuels (e-fuels) play an important role in the defossilisation of road transport. This is because CO<sub>2</sub>-neutral fuels such as biogas, biofuels or synthetic fuels can contribute to significant CO<sub>2</sub> reductions and to improving air quality. In order to achieve the climate targets in transport, the use of renewable fuels with a lower CO<sub>2</sub> footprint is needed - in addition to the further ramp-up of e-mobility. This applies in particular to those cases in which e-trucks or H<sub>2</sub> lorries cannot be used or are difficult to use. The use of alternative fuels in combustion engines is central to the defossilisation of the transport sector. The ramp-up of these biofuels and synthetic fuels should therefore be supported by an ambitious but realistic blending quota of sustainable fuels. Increased blending of sustainable CO<sub>2</sub>-neutral fuels (e.g. Generation I, II and III biofuels as well as RFNBOs and RCFs) can significantly reduce fleet CO<sub>2</sub> emissions.

- **Research and development of alternative fuels**

Research and development should also be stepped up at European level in order to drive innovation in the field of alternative fuels, such as HVO100 or hydrogen mobility.

- **Revision of the ban on combustion engines for cars**

If the agreement on CO<sub>2</sub> emission limits for lorries succeeds in implementing the open-technology approach, the next step would be to "repair" the ban on combustion engines for cars with the 2026 revision.

- **More pragmatism and flexibility**

Further flexibilisation and more "pragmatism" are necessary. From today's perspective, the image of a rapid rise in electromobility cannot be confirmed. The fact is that e-mobility is establishing itself much more slowly than expected. In addition to reluctance on the part of market participants, there are also real obstacles on the market, without the removal of which e-mobility cannot establish itself. If climate protection in transport is to make progress, more attention should be paid to existing potential (renewable fuels) and actual trends (buyer behaviour, popularity of hybrid vehicles, adherence to the combustion engine) should be taken into account.

## 9. Accompanying requirements for defossilisation in transport

### I. General remarks:

Following on from the Green Deal, the path of a green transition will be continued in the European Union in the coming years. The EU energy and climate targets will have to be reconciled with the goal of long-term competitiveness so that the defossilisation of transport can succeed in the future.

Future legislative and implementation projects must take greater account of the principle of technological diversity if the transformation of the transport sector is to be successful. It will therefore be necessary to realise the potential of alternative fuels such as e-fuels, hydrogen and biofuels.

To achieve the climate targets, high additional investments are required in the transport sector. The investment required to make transport in Austria climate-neutral by 2040 is estimated at around EUR 45 to 65 billion for companies.

Ukraine also plays an important role in the transition to a green economy due to its potential for producing green hydrogen. In addition, Ukraine's political and economic integration into the EU-27 is an important goal.

### II. Proposals:

- **Mobilising green finance for the transport transition / Setting up funding for additional investments in transport**

A mix of measures and subsidies with an incentivising and leverage effect is necessary to ensure the high level of investment required. In the mobility sector, the switch to climate-neutral drives primarily requires start-up financing. As long as alternative drive systems in the lorry sector are not economically viable, or not yet economically viable enough, there is no incentive to switch to them on a large scale. To ensure that the switch to vehicles with climate-neutral drive systems and the use of renewable energies in public, commercial and private passenger and freight transport is put on a broader footing, the current funding programmes such as ENIN and EBIN should be expanded to include a Mobility Future Fund, which is financed by national and EU funds. In addition to subsidies and tax incentives, new green finance instruments should also be established to attract more private funds to finance the transport transition. Private-public partnership models could also be a useful addition to the mix of measures. The EU must create the framework for the creation of new green finance instruments and financing models and authorised subsidies.

- **Expanding energy infrastructure in Ukraine**

The reconstruction of Ukraine should utilise the opportunity to fill the existing pipeline infrastructure to Austria with green hydrogen produced in Ukraine.

- Supporting economic investments that ensure the rapid expansion of Ukraine's energy infrastructure.

- Future investments should also flow specifically into the renewal and conversion of the gas network infrastructure in Ukraine so that it is adapted and made "fit" for transport with green hydrogen. The further integration of Ukraine into the European internal market and the creation of an attractive economic environment would accelerate such investments.
- **Expanding subsidies**  
To this end, subsidies and funding must be increased accordingly as an incentive and the appropriate framework conditions must be created at European level:
  - Increasing the efficiency of existing technologies by promoting bridging technologies to achieve CO2 neutrality
  - Promotion of the industrial production of eFuels.
  - Enabling an increase in national subsidies for alternative drive systems in the transport sector (e.g. in Austria through EBIN and ENIN ), which is permitted under EU state aid law.
- **Consideration of the type of fuel for infrastructure tolls**  
The Infrastructure Charges Directive (EU) 2022/362 does provide that Member States can levy a charge for the use of infrastructure, which must be differentiated according to the CO2 emissions of the vehicle. In order to set appropriate incentives and increase the economic efficiency of alternative fuels, we believe that the type of fuel used should be taken into account on a mandatory basis so that alternative fuels are significantly relieved
- **Promotion of innovative logistics (*Green Logistics*)**  
Stronger and more targeted promotion of innovative logistics (green logistics). Examples of this include supporting innovations until they are ready for the market, promoting alternative drive technologies, improved aerodynamics and easier typing.
- **Fleet promotion programme for inland navigation in freight and passenger transport**  
Targeted research and funding programmes should facilitate an early switch to the latest ship technology. Existing funding programmes for environmentally friendly fleet modernisation should be continued and expanded, as there is no funding at all for converting a passenger ship's engine. The performance and competitiveness of domestic shipping could thus be increased. However, this can only be achieved through stimulus funding from the public sector, as the individual shipping companies are not in a position to do this on their own.

## 10. Greening corporate fleets

**Legal act / status of legislative process :** The Commission held a public consultation on "Greening Corporate Fleets" in 2024 and published a communication on the decarbonisation of corporate fleets in March 2025. A public consultation on green corporate fleets was announced for Q2/2025. A proposal for a directive from the Commission is expected before the end of 2025.

### I. General remarks

The initiative for the "greening of company fleets" aims to accelerate the switch to zero-emission vehicles in company fleets. The transport sector should thus contribute to achieving the climate targets. However, the purchase of a vehicle by companies (company cars, hire fleets, taxi companies, large logistics lorry fleets) follows different criteria than a private purchase. Companies have different operational requirements and different needs in terms of charging infrastructure. In the Commission communication, various measures and practices were considered to increase the proportion of zero-emission vehicles in companies. These include adjustments to the tax system, taxi regulations for zero-emission vehicles, charging stations at airports, electrification of islands in Greece, making zero-emission vehicles more attractive through tax policy, opportunities at local level with urban mobility services, rental companies: Leading the way at the airport.

### II. Proposal

- **No mandatory requirements**

The Federal Transport Party firmly and strictly rejects mandatory requirements for fleet operators to purchase emission-free vehicle fleets ("greening" of company fleets). Such an obligation would constitute a disproportionate encroachment on the basic property rights of a vehicle fleet operator. Such obligations are also no guarantee for the greening of company fleets. Rather, smaller, financially weak vehicle fleet operators could be forced out of the market for financial reasons, as many SMEs cannot afford to purchase expensive zero-emission vehicles. Voluntary approaches and incentive systems are to be favoured as the means of choice. Instead of obligations, priority should be given to improving the framework conditions, incentivising the purchase of zero-emission vehicles and improving the alternative infrastructure. Regardless of the type of voluntary incentives, it is crucial that they are applied in a non-discriminatory manner and are standardised across all fleet sizes.



## Infrastructure and combined transport

### 11. TEN-T expansion and coordination of construction measures in the core network

**Legal act / status of legislative process :** Regulation (EU) 2024/1679 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013.

#### I. General remarks:

We call on the Member States to complete the TEN-T network and the necessary access routes to the TEN-T axes as soon as possible. The corridors in the TEN-T core network (2030) and extended core network (2040) that are directly relevant for Austria are:

- Baltic Sea - Adriatic corridor (southern route - incl. northern railway)
- Scandinavian-Mediterranean Corridor (Brenner Corridor)
- Rhine - Danube corridor (western route incl. eastern railway)
- Orient - Eastern Mediterranean Corridor (Northern Railway and Eastern Railway)
- Alps - Western Balkans corridor (Tauern and Pyhrn-Schober axis)

In the case of infrastructure measures - particularly in the freight transport corridors mentioned above - procedural delays by Member States must be minimised.

Against the background of efforts at European level to promote intermodal freight transport and in particular combined transport with incentives in order to increase the proportion of freight transport by rail, the smoothest possible functioning of the important freight corridors in the core network and extended core network must be guaranteed. Long outages and disruptions in the rail network thwart this objective.

For necessary refurbishment projects in the important freight transport corridors, all possibilities must be utilised in the project planning, tendering and award procedure (dimensions of construction lots, award criterion - time, etc.) and construction implementation to ensure accelerated processing. For example, as part of the refurbishment measures in the important Nuremberg - Regensburg and Obertraubling - Passau corridor section, there will be a closure lasting several months (9 months) from 2026 without sufficient capacity being available on alternative routes. This would result in serious disadvantages for Austria as a business location.

#### II. Proposals:

- **Consultation and monitoring mechanism**
- Creation of a consultation and monitoring mechanism for renovation and maintenance work on the high-level rail network to avoid long construction times and rail network outages. Foresighted and controlled capacity management on alternative routes and monitoring of additional costs at EU level. In order to be able

to fulfil this task, the member states should be obliged to publish multi-year plans that define the construction and renovation measures with a guaranteed funding framework.

- **Access routes to the Brenner Base Tunnel**

Rapid expansion of the access routes to the Brenner Base Tunnel is particularly important, as the tunnel's capacity cannot be utilised without sufficient connections to access routes on German and Italian territory.

## 12. Combined transport

**Legal act / status of legislative process :** Proposal to amend Regulation 2020/1056 and Directive 92/106/EEC - COM (2023) 702, Council has not yet reached its general approach, Parliament has not yet adopted its position, procedure number: 2023/0396/COD

### I. General remarks:

The Federal Division for Transport and Traffic sees the strengthening of combined transport as one of its top priorities. The expansion and optimisation of combined transport is essential for achieving the ambitious climate targets set at EU level in the transport sector.

We would also like to emphasise the following approaches to promoting combined transport:

- The framework conditions for **combined transport** must be designed in such a way that they encourage the players, namely the shipping industry and the transport industry, to carry out cross-modal transport. The **trimodal linking** of road, rail and waterway in the sense of co-modality is important here.
- **Terminal expansion for cargo handling** must be driven forward and sustainably funded. In this context, the acceleration of authorisation procedures is urgently required.
- **Financial support** from the Member States must be significantly increased, particularly in the areas of expansion and resettlement of terminals and connecting railways, investments in transport equipment such as craneable semi-trailers, container premiums, investments in innovative systems and technologies, etc. At EU level, the framework conditions for the cancellation or indefinite reduction of the infrastructure usage charge must be created  
\*\*\* Translated with [www.DeepL.com/Translator](https://www.DeepL.com/Translator) (free
- **Rail connections to seaports** in northern and especially southern Europe must be expanded. The EU must ensure that the member states actually expand the TEN network in line with the plans. For example, there are delays in the access routes to the Brenner Base Tunnel in Austria's neighbouring countries, which is delaying the full utilisation of the tunnel's capacity.
- Shifting freight transport to rail requires the **expansion of the rail infrastructure** and the promotion of intermodal terminals and connecting railways in conjunction with an innovation and automation campaign. Existing bottlenecks must be eliminated through four-lane expansion. In the case of infrastructure measures of pan-European importance, procedural delays caused by Member States must be minimised.

- Specifically, there is a need for increased use of innovations such as the **digitalisation** of ordering processes and operational processing and the removal of operational barriers to border crossings .
- Make it possible to carry out **annual technical inspections of trailers** throughout the EU, irrespective of the country in which the trailer is registered; this would be beneficial for combined transport, as it would allow trailers in particular to be transported more flexibly and efficiently on other means of transport (rail and ship) without having to be removed from the transport process for longer than necessary in between
- - **Coordination of the content of EU Directive 92/106/EEC on combined transport**, which is currently being revised, with the EU Directive 96/53/EC on the modification of weights and measures in road transport, which is to be amended..

## II. Proposals:

### Intermodal freight transport, calculation of external costs and aggregated data

With regard to the proposed changes, we note

- **Rethink calculation methodology**  
We hope for a more critical stance on the systemic approach and the calculation methodology for external costs. In any case, it should be noted that the definition of external costs is in line with the infrastructure costs directive. Alternative methods for defining combined transport should be examined.
- **Exemption from weekend, night and public holiday driving bans**  
In combination with rail as the main mode of transport, exempting road transport from weekend, night and public holiday driving bans can be a helpful tool for optimising the use of terminal and rail infrastructure capacity, provided the appropriate controls are in place to ensure fair competition.
- **Exemption from driving bans in the port hinterland**  
However, exempting road transport from driving bans in the port hinterland (short sea shipping) will lead to a major competitive disadvantage for the railways and is therefore viewed critically.
- **Authorisation of non-codified intermodal loading units**  
The current proposal does not include an option for the authorisation of **non-codified intermodal loading units**, such as **non-craneable semi-trailers** .
- **Rail compatibility of road vehicles**  
Clear specifications are required for the rail compatibility of road vehicles (craneability, shapes, sizes, etc.).

- **Clear rules for state aid**

There is also a need for clear rules on state aid (aid to reduce external costs, interoperability aid, investment aid for equipment) in Directive 92/106/EEC on combined transport and/or in the currently revised guidelines on state aid in the railway sector.

- **Supply and discharge routes through regional providers**

At present, there are exemptions from the cabotage provisions for international combined transport for the inbound and outbound legs of road transport. Unfortunately, the current draft directive for the amendment of the Combined Transport Directive does not envisage a departure from this practice.

However, these shorter access and exit routes would be particularly suitable for zero-emission vehicles ("ZEVs"), which are still used too rarely in cross-border freight transport. We therefore propose reconsidering the current practice of liberalising cabotage in the area of feeder and outgoing road transport and subjecting the share of road transport in combined transport to conventional cabotage rules.

By creating incentives for regional providers to use ZEV for pre-carriage and onward carriage and thus to adapt green technologies, a decisive contribution can be made to the defossilisation of freight transport. It also helps to strengthen the regional economy.

## Harmonisation & digitalisation

### 13. Aviation and Single European Sky II plus

**Legal act / status of legislative process :** Regulation 2024/2803 on the implementation of the Single European Sky entered into force in December 2024 .

#### **I. General remarks:**

We welcome the implementation of the Single European Sky 2+. While the European aviation industry is struggling hard to defend its share of the global market, the long overdue integration of Europe's fragmented and inefficient air traffic management system is essential. Strengthening the regulatory framework through SES 2+ will help to eliminate these inefficiencies and improve European air traffic management (ATM).

Furthermore, the standardisation of civil European airspace must be pursued.

#### **II. Proposals:**

In our opinion, however, the legal act does not yet go far enough and should therefore be seen as an interim step. The following points are still open:

- **Promoting sustainable aviation fuels to market maturity**  
The promotion of the market maturity of sustainable aviation fuels can be achieved through various measures, including the earmarking of revenues from the ticket levy and the emissions trading system (ETS) in aviation. The aim of these subsidies is to improve their availability and competitiveness on the market. A coherent EU strategy is required for the targeted promotion of pilot projects and the creation of a regulatory framework to increase the production and use of sustainable aviation fuels.
- **Further development of the Performance Review Body (PRB)**  
The Performance Review Body (PRB) is an independent advisory body set up by the European Commission to assist in the implementation of the Single European Sky (SES) performance and charging system. The PRB consists of industry experts and makes recommendations to the Commission. The PRB has also made recommendations for the Union-wide target areas for the fourth reference period (RP4 - Reference Period 4, 2025-2029) of the SES performance and charging system. We propose that the competences of the Performance Review Body (PRB) should be expanded to enable a more effective assessment of performance within the Single European Sky.
- **Compensation in the event of failure to meet performance targets or SESAR (Single European Sky ATM Research) implementation requirements**  
The SESAR (Single European Sky ATM Research) project brings together the resources and expertise of civil and military actors with the EU institutions to develop innovative technologies and ways of working to improve ATM (Air Traffic

Management) performance. If SESAR objectives or targets are not met, there should be a right to compensation to incentivise those responsible to meet performance targets or SESAR implementation requirements in a timely manner.

- **Closer cooperation between national supervisory authorities desired**

Instead of equipping the national supervisory authorities even more, they should consolidate and integrate their tasks beyond mere cooperation. Greater harmonisation of standards and procedures across national borders would facilitate the future implementation of the Single European Sky (SES). Consideration could be given to pooling resources for certain projects within the FABs (Functional Airspace Blocks) in order to increase efficiency and effectiveness

- **Definition of mandatory selection criteria for support service providers**

The definition of such criteria is intended to ensure the quality and reliability of support services in European airspace and to achieve a uniform standard for air traffic in Europe. The selection criteria should relate to safety standards, technical capacities and efficiency standards.

- **The Network Manager (NM) should play a stronger role to facilitate network consolidation/rationalisation**

The Network Manager of the Single European Sky is the key player for operational and technological network performance in the areas of capacity and flight efficiency. To counteract the increasing delays of flights in the EU, the European Commission has appointed Eurocontrol as Network Manager until 2029 with the mandate to identify short-term measures to reduce congestion and delays for peak travelling times. Measures have also been included in the Commission's implementing regulations, such as the Regulation on Network Functions and the Regulations on Performance and Charging Schemes. We call for the network manager to play a stronger role in consolidation and rationalisation, for example in the merging of routes or the simplification of operational procedures. The aim is to make the European air transport system more efficient and cost-effective.

- **Strengthening "InterFAB" initiatives & maximising operational efficiency in the FAB context (Functional Airspace Blocks)**

European airspace is divided into nine blocks, which are intended to replace or summarise the national areas. The purpose of InterFAB coordination is to provide a structure to facilitate coordination and cooperation between FABs in order to contribute to a reduced fragmentation of European airspace, to support the optimisation of the European ATM Network (EATMN) and to provide a working structure for it. Initiatives such as those of InterFAB and FABEC (Cooperation for a Single European Sky) are to be strengthened.

The aim is also to maximise operational efficiency in the context of FABs (Functional Airspace Blocks). In many situations, such as strikes, conflicts in neighbouring areas, unfavourable weather conditions or natural disasters, an increased need for air traffic control can suddenly arise. This often results in air traffic controllers within a functional airspace block (FAB) being overloaded and operational efficiency being

impaired. In such cases, it should be possible for air traffic controllers from a neighbouring FAB to technically step in to manage the situation.

- **More ambitious deadlines for structural changes**

The deadlines for structural changes such as the reorganisation of national supervisory authorities (NSA - National Supervisory Authority), unbundling and the establishment of network management (NM setup) must become more ambitious.

- **The European Union Aviation Safety Agency (EASA) is to be given the ability to act as a performance review body for the Single European Sky**

The implementation of the Single European Sky will inevitably strengthen EASA's role as a certification authority for both air and ground equipment and ensure that both are implemented consistently. As digitalisation and data exchange between systems on the ground and in the air become increasingly common, it makes sense from a safety perspective for EASA to take over the verification of both sets of systems

- **We strictly reject competition-distorting measures such as bans on short-haul flights or the introduction of paraffin tax (tax exemption should not be equated with a subsidy)**

Maintaining short-haul flights is crucial in many cases, as these flights often serve regions or cities that are more difficult to reach by other means of transport. A ban could therefore have a serious negative economic impact on these areas, particularly on tourism and the local economy. The substitution of short-haul flights with rail connections is often proposed as an alternative. However, due to higher costs, longer journey times and lower reliability, rail is not a true alternative to short-haul flights. This is particularly the case if a connecting flight has to be reached after the train journey, as short-haul flights often only lead to larger airports from which travellers then fly to their final destination.

The paraffin tax exemption is an important means of preserving the competitiveness of the aviation industry and ensuring that airlines remain competitive at international level. The introduction of a paraffin tax could have a negative impact on the economy, as it would potentially affect tourism, trade and the mobility of people and goods. Furthermore, a uniform global implementation of a paraffin tax is not realistically feasible and would therefore only lead to airlines switching to airports in countries with lower taxes, which in turn could lead to a shift in air traffic and a distortion of competition.



## 14. Border traffic: free travel for EU licence plates

### I. General remarks:

The principle of the free movement of goods, as a cornerstone of the internal market, is essential for ensuring the security of supply, the efficiency of supply chains and the competitiveness of the European economy.

The recent intensified customs controls at the borders, in particular the measures implemented by Bulgaria against vehicles travelling to Austria, have caused considerable delays and disruptions in freight transport. Dozens of Austrian hauliers were sometimes stuck at the Bulgarian border for several days. Such unnecessary obstacles to the free movement of goods must be avoided.

### II. Proposals:

- **Free travel, 24/7, 365 days a year**

The aim must be to guarantee the unrestricted movement of road freight vehicles with EU licence plates within EU borders, around the clock, 365 days a year .

- **Influence Member States to stop excessive border control practices**

Until the EU-wide abolition of border controls for EU licence plates in road freight transport has been achieved, the Commission should exert pressure on the Member States to implement their border control practices in an efficient and targeted manner without unnecessarily hindering the free movement of goods.

## 15. EU-wide standardisation of stickers for labelling pollutant classes (for pollutant zones) ex works

### I. General remarks:

To improve air quality, driving bans due to particulate matter apply in some federal states for lorries and articulated lorries of various emission classes (mostly emission class "Euro 2" and worse), in some cases regardless of weight. All vehicle classes covered by the federal state regulations (heavy goods vehicles) that are not affected by a driving ban due to their classification in an emissions class must be provided with a corresponding emissions class labelling sticker (emissions sticker)

There are currently no equivalent emission class markings from other Member States of the European Economic Area that are defined by law or by the authorities, from which the necessary information can be seen and which could therefore be recognised as equivalent in Austria. In practice, this leads to a considerable burden for contractors, especially if, for example, a windscreen has to be replaced. Possibilities for agreements on the mutual recognition of labelling are being discussed on an ongoing basis with member states of the European Economic Area.

### II. Proposal:

The transport industry is calling for EU-wide standardisation of stickers for labelling pollutant classes (for pollutant zones) ex works. Harmonised standards create a level playing field for all market participants. They ensure fairness in competition and a level playing field and are therefore the basis of the market economy.

## 16. Exclusion of multiple penalties

### I. General remarks:

New and stricter legal regulations are constantly being introduced in the transport industry. The possibility for member states to provide for different regulations leads to a multitude of regulations, which makes it difficult for the norm addressees to maintain an up-to-date overview of the applicable regulations and to act in accordance with the law. This often results in disproportionately high penalties being imposed on both drivers and companies.

One example of this is the situation in which a lorry driver is fined because the load was inadequately secured. At the same time, the company to which the driver belongs can be fined for violating company regulations or non-compliance with transport regulations in addition to the driver's fine. Similar penalties can also be imposed for violations of driving times, rest periods, vehicle defects, vehicle maintenance and equipment. This double sanctioning places a burden on both the driver and the company and can lead to financial burdens that can have a negative impact on the company.

In practice, the principle of cumulation, according to which several penalties are to be imposed at the same time if someone has committed several administrative offences through one act, also leads to unfair multiple punishment. In one specific case, a driver was charged with three offences of insufficient load securing (1: because the existing lashing straps had been damaged by the load, 2: use of too few lashing straps, 3: lashing hooks were not hooked into the lashing eyes)<sup>2</sup>.

The problem of multiple penalties is fundamentally present at national level and is not equally present in all EU member states. Nevertheless, it can be observed to varying degrees in many EU member states, for example in Belgium, the Czech Republic, Denmark and Sweden. We therefore consider it desirable for this problem to be discussed at European level and for cross-border solutions to be found.

We therefore propose the following:

### II. Proposals:

- **Harmonisation of criminal practices throughout Europe**

The European Union should adopt comprehensible guidelines and standards for determining penalties in road traffic in order to ensure uniform and fair treatment within the EU and to promote the harmonisation of penal practices. These standards must be clearly defined so that there is no room for manoeuvre for member states in their implementation - these should be deleted or avoided in any case when amending existing regulations, but also in the case of new regulatory content. As implementation in Austria is often very strict or excessive, this leads to unequal competitive conditions for our transport companies. Harmonisation could also be

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<sup>2</sup> <https://www.dertransporteur.at/news/doppelt-und-dreifach-bestaft/>

achieved through the exchange of best practices and the development of common guidelines.

- **Bending away from rigorous punishment and increasing the use of admonishments**  
Rigorous punishments for "petty offences" and minor infringements are to be reduced throughout the EU and replaced by the increased use of warnings in administrative penal practice. This would allow for a more flexible handling of traffic offences, ensuring proportionality between the severity of the offence and the penalty imposed.
- **EU-wide abolition of multiple penalties over which companies have no direct influence**  
The multiple punishment of drivers and companies for offences committed by drivers over which the company has no direct influence at the time of commission is to be abolished throughout the EU. This regulation aims to relieve companies of responsibilities that are beyond their control and to ensure that drivers are held individually accountable for their actions without the company being additionally penalized.

## 17. Uniform application of social law for tachographs in road traffic

**Legal act / status of legislative process :** Regulation (EU) 165/2014 of 4 February 2014 on tachographs in road transport, repealing Regulation (EEC) No 3821/85 on recording equipment in road transport and amending Regulation (EC) No 561/2006 on the harmonisation of certain social legislation relating to road transport.

### I. General remarks:

We propose greater harmonisation in social law. In order to ensure legal certainty and a level playing field within the EU, social legislation must be applied in the same way in all member states. We therefore propose that national exceptions should only be authorised in exceptional cases.

### II. Proposal:

#### **EU-wide harmonised rules on tolerance for minor infringements (Regulation (EU) 165/2014)**

The penalties for infringements of the recording equipment obligations are regulated by the Member States. This not only leads to different levels of penalties, but also - depending on the different administrative practices in the Member States - to arbitrary and disproportionate fines for minimal offences (e.g. minor offences). Key provisions should therefore be incorporated directly into EU law.

## 18. Digitisation of vehicle-related documents

### I. General remarks:

Carrying a large number of required documents is a considerable burden for drivers. They need to have a large number of physical documents to hand at all times, which is very time-consuming and can result in high penalties if they fail to comply. Digitising all these documents would reduce the burden on drivers and increase efficiency by making it easier to access all the information they need. Increased digitisation could also lead to a significant acceleration for the control authorities.

The current division of digital European documents into different databases (such as the risk rating system, the Tachonet, the registration database and the EU Community licence) leads to considerable additional work, which reflects the different responsibilities and impairs efficiency and transparency in the area of vehicle documentation. Harmonisation and digitalisation of these databases is therefore not only desirable, but also urgently required in order to simplify administration and optimise transport operations.

We support the efforts of European associations such as the IRU, ECR (Europe Control Route) and ROADPOL (European Roads Policing Network) to organise pilot projects with digital documents and their control mechanisms. In the first phase, a particular focus will be on the Common Roadside Control Form. We see the updating and digitalisation of this document as a very important step, as well as its availability in all EU languages.

### II. Proposals:

- **European "one-stop digital shop" for vehicle-related documents**

We recommend the creation of a European "one-stop digital shop" in which vehicle-related documents can be stored and retrieved in a centralised manner. To support companies, all these databases should be merged into one. In addition, a reminder function within this database would be helpful, reminding companies when certain documents need to be renewed. It would be more efficient (and faster for companies) for the executive to scan a QR code on the vehicle instead of having drivers search for paper documents, such as the tail lift manual. Since the relevant documents are then displayed online, penalties for drivers and companies can be avoided if, for whatever reason, the driver does not have them physically available.

In principle, we are in favour of the same documents being required at European level. However, it should also be possible via the database to see whether there are different document requirements in individual Member States and to upload these as well. This would allow drivers and companies to clearly understand which documents are required depending on the countries they are travelling through. In addition, all necessary measures should be taken to prevent technical problems during the retrieval of documents, e.g. in the event of an inspection.

The following documents should be available digitally for drivers travelling within the internal market (EU and EEA) in the European "one-stop digital shop" :

|                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| For the vehicle                    | <ul style="list-style-type: none"> <li>• Registration certificate</li> <li>• Cover licence plate for trailers registered abroad</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Optional for the vehicle           | <ul style="list-style-type: none"> <li>• Low noise certificate</li> <li>• Documents for cabotage</li> <li>• Original rental contract (for rented car)</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| For the driver:inside              | <ul style="list-style-type: none"> <li>• Digital driving licence, passport or identity card or copy thereof;</li> <li>• Records to be carried by the driver in accordance with Article 36 of Regulation 2014/165, in particular all handwritten records and printouts made on the current day and on the previous 28 (56) days, which are required in accordance with Regulation 561/2006 and 165/2014;</li> <li>• Documents to be carried by the driver pursuant to Article 1(11)(b) of Directive 2020/1057 for the verification of a posting</li> <li>• Confirmation of employment (e.g. if the driver drives a hire vehicle)</li> </ul> |
| Optional for the handlebars:inside | <ul style="list-style-type: none"> <li>• Confirmation that you are authorised to drive the vehicle</li> <li>• EU driver's licence (for drivers from neither the EU nor the EEA)</li> <li>• Possibly visa, dangerous goods (driver's) licence (for dangerous goods transport)</li> <li>• EU confirmation for driving-free days</li> <li>• Driver qualification card for professional drivers (for drivers who do not have Code95 on their driving licence))</li> </ul>                                                                                                                                                                      |

- **EU-wide abolition of the EU driver's logbook**

Many countries already have digital versions of the EU driver's logbook. We welcome the fact that the digitalisation of the logbook is now on the agenda throughout the EU. This is because the manual management of the EU logbook harbours the risk of incorrect entries, which can lead to penalties.

Although we see the digital solution as a good start, we generally consider the EU logbook to be superfluous, as the digital tachograph is capable of performing the same task efficiently. We would therefore welcome the complete abolition of the EU logbook.

- **Hazardous goods inspection and recurring inspections**

We recommend that dangerous goods inspections and other recurring inspections in the transport sector be digitalised. Such a test format would reduce the administrative burden and costs for driving schools and companies, improve compliance with regulations and ensure a standardised quality standard.

- **Ensuring data protection and data security**

It is particularly important to us that data protection, data security and transparency are guaranteed, especially with regard to which data is checked. In view of the current discussions surrounding initiatives such as the installation of automatic control systems along the EU's main transport routes to check compliance with weight and dimensional limits for lorries and buses, as well as the use of digital enforcement tools such as the "Intelligent Access Policy", it is of the utmost importance to create the appropriate framework conditions for data protection. It is crucial to ensure that only as much data is collected as is available on the current documents and as is necessary for control purposes.



## Driving and rest times

### 19. Revision of driving and rest times for coach tourism (passenger occasional transport)

**Legal act / status of legislative process :** Regulation (EU) 2024/1258 of 24 April 2024 amending Regulation (EC) No 561/2006 as regards minimum requirements for minimum breaks and minimum daily and weekly rest periods in the passenger occasional services sector and as regards the power of Member States to impose penalties for infringements of Regulation (EU) No 165/2014 committed in another Member State or in a third country

#### I. General remarks:

##### **Different regulations for mixed traffic**

There are bus companies whose drivers operate both occasional and regular services within the same shift - so-called "mixed services". A typical example of mixed services are, for example, rail replacement services in the event of unexpected disruptions. In this case, the drivers of scheduled services take over occasional services during the same shift. Other examples include excursions with schoolchildren, transporting employees to their workplaces, ski buses, excursion trips and others.

Different national and European regulations create contradictory requirements in the area of occasional services or lead to a legal loophole. In practice, this situation means legal uncertainty for the people involved, employers, bus drivers and the responsible enforcement bodies. During random roadside checks, for example, the police are unsure which regulations apply when they check bus drivers on a shift with "mixed services".

#### II. Porposals:

- **We welcome the fact that the "12-day rule" has also been authorised in Germany**  
The 12-day rule, which was previously only permitted for cross-border journeys, has also been authorised for domestic journeys. Unfortunately, however, no changes to the application (45h rest period before and 69/90h afterwards) are being discussed. This is still only permitted with a single travelling group - a mixture of different journeys is not on the table. Unfortunately, neither the European Commission nor the European Parliament have taken up proposals from the industry to make the rest period compensation more flexible (up to three weeks afterwards)

## 20. Tolerances for driving and rest times in the carriage of goods and special rules

**Legal act / status of legislative process :** Regulation (EC) 561/2006 on the harmonisation of certain social legislation relating to road transport .

### I. General remarks:

It is currently possible to deviate from the regular driving and rest times in exceptional situations in order to ensure the safety of persons, the vehicle or its load.

In view of the specific challenges and unpredictability associated with construction site transport, there is an incompatibility between compliance with the provisions of Regulation 561/2006 and the work requirements on construction sites.

There are also challenges when operating battery-powered vehicles due to the longer charging times compared to refuelling with conventional fuels. It is therefore necessary to adapt the regulations for driving and rest times to the electrification of road transport and to integrate the charging process of battery-powered vehicles into driving operations in the best possible way.

### II. Proposals:

- We therefore propose the creation of an exemption option for roadworks transport, as already exists for other situations in Article 13 of Regulation 561/2006. To enable drivers to react appropriately when unforeseen events occur, we propose the introduction of tolerances for driving and rest times in special circumstances such as traffic jams or detours - not only in the guidelines.
- We propose an adjustment to driving and rest times to allow vehicle movements in connection with the charging process of battery electric vehicles during break/rest times.

## 21. 5-star car parks instead of a ban on weekly rest periods in the cabin

**Status/legislative process :** Regulation (EU) 2020/1054 of 15 July 2020 amending Regulation 561/2006.

### I. General remarks:

The regular weekly rest periods and compensatory rest periods for reduced rest periods may not currently be spent in the vehicle. In practice, this regulation often leads to difficulties, as there are not enough suitable alternatives to cabin rest. Drivers are therefore often faced with the situation of travelling additional distances at the end of their working day in order to reach adequate accommodation for the prescribed rest periods.

### II. Proposal

In view of the Commission's plans to build secure car parks every 150 km as part of the TEN-T core road network, we propose that the obligation not to spend the weekly rest period in the cabin be abolished and that investment be made instead in the creation of further secure parking facilities.

When creating adequate car parks, the concept of 5-star car parks should be taken into account. These should fulfil the following criteria: Safety, cleanliness, warmth, social facilities and affordability. By creating such modern car parks of the future - such as the one currently being built on the A8 Innkreis motorway - which are specially tailored to the needs of truck drivers, a safe and modern environment can be guaranteed for their rest periods.

## Weights and dimensions

### 22. Revision of the directive on weights and dimensions

**Status/legislative process :** Proposal for an amendment to the Directive - COM(2023) 0445, the position of the European Parliament was voted on 12 March 2024, the Council has not yet reached a general approach, procedure number: 2023/0265/COD

#### I. General remarks:

We expressly welcome the revision of the directive on weights and dimensions announced by the Commission with the main aim of increasing the total permissible weight for zero-emission vehicles by the weight of alternative fuel technologies. This step is necessary in order not to hinder the transition to zero-emission vehicles and to reduce the amount of energy used per transport volume.

It is also particularly pleasing that our demand to introduce 5-axle solo lorries with 40 tonnes is reflected in the EU Commission's proposal. These lorries are more efficient and therefore more environmentally friendly. They also have significant advantages due to their higher loading capacity and stability, better manoeuvrability and traction and reduced road congestion.

#### II. Proposals:

Current transport practice shows that the rigid system of axle loads and maximum permissible gross weight does not correspond to practice, but that adjustments to the maximum permissible dimensions and weights of lorries and buses are necessary to increase efficiency.

- **Rail compatibility**

The directive is also becoming increasingly relevant, particularly in the context of promoting rail-based multimodal transport chains. This requires the adaptation of lorries and trailers in terms of weight, dimensions and craneability in order to ensure rail compatibility.

- **Higher weight limit for craneable semi-trailers**

In order to create incentives to use more craneable semi-trailers and to facilitate the transfer of freight to rail, we are calling for a higher weight limit (41 tonnes) for craneable semi-trailers at EU level, including for operations outside combined transport.

- **"Long lorry"**

In order to achieve CO<sub>2</sub> savings in transport and increase the efficiency of the transport process, the use of "long lorries" based on the German model could be examined. It should be taken into account that long lorries with a larger transport volume may only be used on selected routes, provided that the currently applicable

maximum permissible total weights are adhered to, as a supplement to and not in competition with existing rail freight transport services. The introduction of gigaliners, on the other hand, is not considered feasible in Austria.

- **Dimensions for car transporters**

The dimensions for car transporters should also be adapted to increase efficiency and reduce CO<sub>2</sub> emissions. For example, if they were extended by just 60 cm, two more vehicles could be transported.

- **Maximum axle load**

When complying with the maximum permissible gross weight, the maximum axle load, i.e. the highest technically possible axle load specified by the manufacturer, should be used as the basis for determining the axle load and not, as is currently the case, the maximum permissible axle load.

- **Bi-articulated busses**

We demand an increase or harmonisation of the length dimensions of double-articulated buses and buses with trailers to extra-long double-articulated trolleybuses (25m).

- **Semi-trailer truck**

Changes should be made to the dimensions of Semi-trailers so that they can be fitted with aerodynamic components .

- **Alternatively operated two-axle buses (M3)**

For two-axle buses with alternative drive systems, the current maximum authorised weight of 19,500 kg is to be increased by the additional weight required for the alternative drive technology.

## 23. Access to the profession - Small van industry: weight adjustment for alternatively fuelled vehicles

**Legislation** : Professional Access Regulation (Regulation 1071/2009) and Market Access Regulation (Regulation 1072/2009).

### I. General remarks:

The issue of the weight of electrically powered light commercial vehicles deserves special attention. Due to their higher tare weight compared to conventional vehicles, operators are faced with the challenge of either accepting a reduced payload or exceeding the limit of 3.5 tonnes.

However, exceeding this limit would have significant consequences, such as the need for a licence, which would be due solely to the higher weight of a vehicle with an alternative drive system.

In order to ensure that the use of electric vans does not become a disadvantage for companies, there is an urgent need to create a legal balance at national, but above all at EU level. This would create a fair and balanced framework that facilitates and promotes the transition to more sustainable transport solutions.

### II. Proposal:

We therefore propose that the weight limit for alternatively fuelled vehicles be adjusted to 4.25 tonnes at EU level in the relevant regulations, such as the Professional Access Regulation and the Market Access Regulation, so that they are not disadvantaged due to their higher tare weight.

Such an adjustment would not only ensure equality with regard to the weight of alternatively fuelled vehicles, but would also make a decisive contribution to the transition to zero-emission vehicles and thus support the objectives of the EU Green Deal.

## Relief

### 24. Reduction of the administrative burden and rationalisation of reporting requirements in transport

**Status/legislative process :** Against the backdrop of geopolitical changes, the European Commission has implemented what we believe is an urgently needed change of course towards greater competitiveness and regulatory simplification. With the first two omnibus proposals for the simplification of sustainability legislation (CSRD, CSDDD, CBAM, taxonomy) published at the end of February 2025, the EU Commission has also reaffirmed its simplification ambitions in the areas of sustainability legislation with the aim of reducing bureaucratic costs for companies in general by at least 25% and for SMEs by at least 35% by 2029.

#### **I. General remarks:**

We welcome this objective, as companies continue to be burdened by excessive bureaucracy. With regard to the omnibus simplification proposals, all measures that contribute to simplifying and increasing the practicability of the requirements in the area of sustainability are to be welcomed in principle. We also consider the "stop the clock mechanism" to be positive.

#### **II. Proposals:**

In addition to the European Commission's proposals already mentioned, we propose the following measures to reduce bureaucratic burdens :

- **Improved training: combination of driving licence and initial qualification (Professional Drivers Directive (Directive (EU) 2022/2561)**  
As the majority of lorry and bus drivers are obliged to meet the requirements of an initial qualification, it makes sense to combine the initial qualification with training and testing for the driving licence. We propose creating the explicit possibility of integrating driving licence training and the initial qualification more closely in future. A strict separation between the initial qualification and driving licence training would increase the time and costs for applicants. This could influence their choice of profession to the detriment of the driving profession.
- **Avoid repeating training by gradually reducing the duration of training from the 2nd training course onwards, as drivers have already gained more experience (Professional Drivers Directive (EU) 2022/2561)**
- With regard to the organisation of further training over the 5-year period, drivers and companies should have the opportunity to decide freely on the distribution of further training within the 5-year period according to their individual requirements.
- 
- Compulsory completion of the same training content every five years is often considered unnecessary. We therefore propose gradually reducing the duration of

training from the 2nd training course onwards, as drivers have already gained more experience. In this way, excessive repetition can be avoided.

- **Interoperability of the operation and traffic management subsystem of the rail system (Implementing Regulation (EU) 2023/1693)**

The rule and route book should only contain the rules and information that are absolutely necessary in order to limit the administrative burden on railway companies. We reject the view that train drivers need to know every single route and therefore need to practise driving it. It is absolutely sufficient and also common practice for train drivers to be familiar with the system (signals, etc.). In this respect, clarification in the sense of more specific guidelines from the EU would be desirable.

- **EU-wide multimodal travel information services (proposal for an amendment to Delegated Regulation (EU) 2017/1926)**

The additional requirements for historical data (Art. 3 para. 1, Art. 4 para. 1 and 3 as well as Art. 6 para. 1) should be reduced to the necessary minimum, as all data to be provided must be physically stored at some location. This puts a strain on storage capacity, which is usually provided by cloud providers. In order to reduce the burden on data and service providers as well as the environment, we are in favour of not having to provide "raw data" in this area.

We do not recognise any objective necessity for the inclusion of occupancy data - there is no recital from which the motivation could be derived. In the past, occupancy data was hastily introduced in response to the pandemic and data protection aspects were pushed into the background.

With regard to the simplification proposals in the omnibus package, we suggest:

- **Restriction of the scope of application of the CSDDD (Supply Chain Directive)**

The proposed simplification of due diligence obligations and the restriction to direct business partners are to be welcomed. Irrespective of its scope of application, the CSDDD has a significant impact on all companies, especially SMEs (so-called "trickle-down effect"). It is therefore certainly to be welcomed that the due diligence obligations are now limited to direct suppliers and only need to be checked in the indirect supply chain if there is demonstrable knowledge. It is incomprehensible that the due diligence obligations should continue to apply to intra-EU supply chains. In combination with the restriction of the due diligence obligation to direct business partners, this could ensure that European companies scrutinise each other, whereas companies in non-European risk areas that are at the beginning of a supply chain are not scrutinised. This cannot be in the interests of the intended increase in European competitiveness.

- **Limitation of the scope of application of the CSRD (sustainability report)**

The restriction of the scope of application of the CSRD is expressly welcomed. In the interests of standardisation and a simple overview, an alignment of the turnover/balance sheet total limits with those of the CSDDD (> EUR 450 million worldwide annual turnover) would also be very welcome. However, it is important



that the trickle-down effect is cushioned accordingly. In addition, the VSME must also be further reduced.

## 25. Freedom of choice in rail transport under the PSO Regulation

**Status/legislative process :** On 26 June 2023, the European Commission published new interpretative guidelines on Regulation (EC) No 1370/2007 on public passenger transport services by rail and by road (in short "PSO Regulation" for Public Service Obligation Regulation (EC) No 1370/2007 or 2016/2338 on public passenger transport services by rail and by road of the European Parliament and of the Council).

### I. General remarks:

The PSO Regulation specifies how the competent authorities may act in compliance with Union law in the field of public passenger transport in order to ensure the provision of "services of general interest" (see Art. 1 (1) PSO Regulation).

With regard to the type of order, the PSO Regulation clearly gives the legal practitioners room for manoeuvre at national level by providing for several award options (e.g. competitive tendering or various forms of direct award). In Austria, it is primarily the federal government, the federal states and the transport associations that apply the direct award regulations within the framework of the PSO Regulation, which subsequently also has an impact on the transport companies and their services. The deliberately created possibilities of direct award are successfully utilised in numerous member states. Taking the railway sector as an example, it is striking that those states that have opted for direct award play a pioneering role in terms of punctuality, customer satisfaction or rail kilometres travelled per inhabitant.

In its guidelines, however, the European Commission calls for the competitive procedure to be prioritised over the direct award of public service contracts for rail passenger transport. The European Commission's guidelines therefore contradict the PSO Regulation. This obvious discrepancy between the Regulation and the interpretative guidelines was assessed by independent experts (on the one hand by university lecturer Dr Walter Schwartz and lawyer Jacqueline Kachlyr-Poppe and on the other hand by European law expert Prof Konrad Lachmayer and Prof Jean-Philippe Derosie):

- The interpretative guidelines restrict the possibility of direct award and therefore contradict the text of the regulation and, at the same time, the intention of the legislator.
- The interpretative guidelines are not legally binding; they merely reflect the legal opinion of the European Commission. The interpretative guidelines therefore do not create any new legal norms. In particular, this is not a case of authentic interpretation.
- It is up to the Member States to define their own objectives for minimum requirements (e.g. environmental protection, mobility for people with disabilities or consumer protection) for services of general economic interest.
- The ex-ante needs test formulated by the European Commission cannot be inferred from the PSO Regulation.

- The provision according to which Art 5 (4a) PSO Regulation would have to be interpreted restrictively is not to be followed.

The Council has rejected the Commission's proposal that passenger transport services should only be authorised if the award is both appropriate and proportionate. For reasons of democratic policy, the rule of law and the separation of powers, we reject the attempt to push through the legislative initiative from 2013 on the PSO Regulation via the diversions of these interpretative guidelines - against the will of the actual legislative bodies.

## II. Proposal:

- **The choice in rail transport between direct award and competitive tendering must be retained .**

One of the advantages of direct award is that it helps to create new and denser train connections quickly. Tenders, on the other hand, take a long time and delay the urgently needed change in mobility. Experience with liberalised railways in other countries shows macroeconomic and ecological downward trends. Tenders do not make the railways more efficient, but rather increase the risk of a poorer service and higher ticket prices for passengers.

## 26. Relieving the burden on regions - Local tariffs

**Status/legislative process :** Regulation (EU) 2018/302 of 28 February 2018 on measures against unjustified geo-blocking and other forms of discrimination based on customers' nationality, place of residence or place of establishment (Geo-blocking Regulation)

### I. General remarks

In principle, the objectives of the Geo-blocking Regulation, namely to ensure the smooth functioning of the internal market, are shared. According to its intention, the Geo-blocking Regulation is primarily directed against technical default settings that prevent customers from one Member State from accessing a website that the provider has set up primarily for customers from another country.

In areas outside of e-commerce, however, its application must be scrutinised. There is a lack of clearly defined guidelines for the permissibility of objectively justified differentiations, in particular for regional requirements and measures specific to target and customer groups.

Particularly in connection with regionally rooted services, for example in connection with the tourism industry, the lack of differentiation of factual justifications and exemptions leads to massive legal uncertainty in connection with the necessary consideration of regional requirements.

Especially in structurally weak, rural regions that are particularly dependent on tourism, winter tourism in particular generates added value that enables prosperity and prevents emigration. However, the local population is often confronted with increased traffic congestion and higher prices in certain areas of everyday life. In order to enable compatible, regional solutions such as local tariffs, legal certainty must be ensured

### II. Proposal

- **Enabling local tariffs**

In order to create a compatible balance, the Geo-blocking Regulation should allow factual differentiations in the tourism services offered (e.g. local tariffs) .

## Railways

### 27. Guidelines on State aid for land transport and multimodal transport

**Status/legislative process :** On 18 June 2024, the European Commission published its draft guidelines on state aid for land transport and multimodal transport and the draft block exemption regulation on state aid for land transport and multimodal transport. A second draft is to be sent to the EU member states in Q2 2025. The final versions are to be adopted in Q4/2025 and Q1/2026. Procedure number: 2022/0209/NLE

#### I. General remarks:

The rail sector must improve its intermodal competitiveness by optimising processes, promoting innovation and striving for cross-border interoperability. These challenges cannot be solved by the market alone. State aid is a suitable instrument to make rail freight transport more attractive and affordable and to reduce competitive disadvantages.

In the 2008 Railway Guidelines, the European Commission set out the parameters under which EU Member States can introduce aid schemes that are considered compatible with the EU internal market. Fifteen years later, however, conditions in the European transport market and the global economic environment have changed fundamentally.

The urgent need for modal shift should be reflected in the EU's regulatory approach to state aid (guidelines for inland and multimodal transport and block exemption regulation for inland and multimodal transport), which should provide strong incentives for modal shift and make it easier for Member States to support rail transport.

#### II. Proposals

- **Compensation for the external costs saved**  
The aid intensity for "aid to reduce external costs" needs to be increased to 100 % of the eligible costs in the guidelines .
- **Equalisation of competitive disadvantages due to the system**  
We call for the aid category "aid for the use of infrastructure" to be retained in the new guidelines, including the current aid intensity of 100% of eligible costs .
- **Incentives for the modernisation of European freight wagon fleets**  
In order to make European freight wagon fleets fit for new technologies, such as digital automatic coupling (DAK), aid should be granted in the form of direct subsidies and the guidelines should avoid restricting the beneficiaries based on their company size.
- **Promotion of investments in multimodal terminals and private sidings**  
We propose setting the threshold for private siding projects in the Block Exemption Regulation (BER) at EUR 2.5 million per project;

We also propose setting an aid intensity of 100% with clearly defined eligible costs instead of the mandatory 'funding gap' analysis in the guidelines, which means a high administrative burden for companies and the funding body; in addition, loading/unloading equipment should be included in the list of eligible costs for private sidings in the guidelines and the BER.

## 28. Utilisation of railway infrastructure capacity in the Single European Railway Area

**Status/legislative process :** Proposal for a Regulation amending Directive 2012/34/EU and repealing Regulation (EU) No 913/2010 - COM (2023) 443, the legal act is in the trilogue procedure, procedure number: 2023/0271/COD

### I. General remarks:

We take a fundamentally positive view of the European Commission's legislative proposal, which builds on sector initiatives (including Timetable Redesign). Capacity planning and the available capacity will be better aligned with customer needs.

It is also positive that the Commission's legislative proposal does not centralise capacity and traffic management through an EU Central Entity. The closer cooperation between infrastructure managers is welcomed.

We support large parts of the rapporteur's draft report, including the definition of "compensation" in connection with "commercial conditions" (AM 24), the inclusion of the system train path concept (AM25, AM 88) and the multi-annual financing of the infrastructure manager (AM 41, 42)

### II. Proposals:

- **Coordination effort for route capacity planning**

The involvement of stakeholders in capacity planning must be appropriate and cost-effective. Unnecessarily high coordination effort on the part of the infrastructure manager (IM), which slows down the capacity planning and allocation process, must be avoided. This also applies to consultations on the draft working timetable (Art. 32. (10)).

- **Updating the capacity strategy**

Updating the capacity strategy as provided for in Art. 16 (4) and the capacity model according to Art. 17 (2, 3) is not feasible.

The current proposal would force the IMs to make the same changes to several strategy documents in parallel, which would cause a high workload but would not bring any additional benefit. Similarly, continuous changes to the capacity strategy and the model are not feasible, as the limit points would have to be constantly updated

Art. 22 (1) states: "The infrastructure manager shall carry out a capacity analysis within six months of declaring a railway infrastructure to be heavily used or congested." In our view, this approach of using the same measure for congested and heavily utilised infrastructure is not efficient, leads to high administrative costs and prolongs procedures. We therefore recommend differentiating between measures for heavily utilised and overloaded infrastructures. In general, it is important to avoid

excessive bureaucracy for infrastructure operators in order to ensure efficient implementation of this regulation.

Proposed amendment: The consultation of stakeholders provided for in Article 16(5) for the capacity strategy and in Article 17(4) for the capacity model should only be mandatory for infrastructure managers of neighbouring countries and not for "other infrastructure managers" in order to avoid unnecessary bureaucracy.

### **III. Further necessary measures to support cross-border rail transport**

- **Continuous train journey:** A single inspection of the train for the entire train journey must be recognised as sufficient across borders
- Harmonised reporting on construction work in cross-border rail transport
- **Improved system requirements for the railway due to :**
  - Relief of the costs of traction current
  - Organisational measures on the infrastructure side to promote Alpine transit by rail
  - Harmonised implementation of uniform operating rules and train composition regulations
  - Changing operating language, new solutions for cross-border rail transport
  - Continuation of rail infrastructure expansion with a focus on freight transport: target network 2040



## 29. Continuation of the successful "night train" model

### I. General remarks

In the "European Climate Law", the European Union has set itself ambitious CO<sub>2</sub> reduction targets, particularly for the transport sector. Night trains make an important contribution to achieving these climate targets, as they are an environmentally friendly option for long-distance transport and are characterised by high energy efficiency and low land consumption.

Night trains also appeal to a broad target group and have long-term economic potential. At present, however, this potential can only be utilised to a limited extent. High operating costs, limited capacity utilisation (usually only one journey per day) and EU-wide infrastructure bottlenecks make economic operation difficult. Targeted measures and suitable political and infrastructural framework conditions are required to drive forward the expansion of sustainable night train connections.

### II. Proposals

- **Reduction in toll charges for night trains and introduction of a night segment**

The track access charges account for 10-20% of the total costs of night train operations. A separate, more cost-effective price segment for night trains - harmonised across the EU - would significantly improve profitability. This could be achieved, as in the Belgian model, through full or partial reimbursement of track access charges and traction power costs. At the same time, infrastructure operators should be compensated for lost revenue. The new EU guidelines on track access charges provide a suitable framework for such a regulation.

- **PSO support**

New night train connections - especially cross-border ones - require high upfront investments and harbour economic risks. Public service orders (PSOs), as provided for in Regulation (EC) 1370/2007, enable state support for start-up and risk financing. This option has hardly been utilised to date. Targeted application would facilitate the development of new lines, particularly on routes with high environmental benefits but an uncertain market environment

- **Improve strategic and ad-hoc capacity planning and management to reduce delays and disruptions**

Delays in night train services are often caused by roadworks and low priority on the network, especially during the morning rush hour. Better strategic and operational capacity planning - for example through EU-wide early coordination of roadworks and firmly reserved train paths - can increase reliability. In addition, clear prioritisation rules are needed that take account of the public interest in climate-friendly mobility. The current EU regulation on the utilisation of infrastructure capacity (COM 2023/0271) should explicitly take night trains into account here.

## 30. Promotion of innovations in rail freight transport

**Status/legislative process :** Applicable Technical Specifications for Interoperability (TSI), amendment proposal 2023/1695/EU of 10/08/2023

### I. General remarks

The EU-wide harmonised introduction and promotion or securing of funding for the ETCS (European Train Control System) train control system is welcomed in principle, as it will increase the efficiency of the rail infrastructure. However, it should be noted that existing vehicles can no longer run with the conventional safety system and that upgrading to ETCS is not yet offered by the railway industry across the board and is very expensive, at EUR 800,000 per vehicle. As a result, new Siemens Vectron Dual Mode locomotives in Austria will have to be replaced by reactivated diesel locomotives by the end of 2025 due to a lack of ETCS integration caused by bottlenecks on the part of the manufacturer.

The EU-wide introduction of digital automatic coupling is also seen as positive in principle. However, consideration must be given to the existing fleet and the financial resources available to the companies.

### II. Proposals:

- **Digital automatic clutch (DAK)**

We call for business-friendly framework conditions in connection with the EU-wide introduction of digital automatic coupling and securing the financing of DAK

- **EU-wide harmonised train protection system ETCS**

Travelling on lines equipped with ETCS without the conventional safety systems is only possible if the traction units are also equipped with the very expensive ETCS safety system. Traction units with a conventional safety system (not ETCS-compatible) cannot travel on this "ETCS infrastructure". It must therefore be ensured that the sole use of ETCS is only introduced in a harmonised manner in the Member States in order to enable sufficient traction units to be used. Until then, safety systems installed in parallel (PZB 90) should remain switched on alongside the ETCS in order to enable continued operation. Otherwise, a slump in rail freight transport is to be feared due to the high acquisition costs or lack of vehicle availability.

- **Subsidies for the switch to ETCS**

Subsidies to enable an accelerated ETCS upgrade of existing vehicles .

