

2025 - 2029



Preface



The **Federal Transport Division of the Austrian Federal Economic Chamber** is the legal representative of the interests of all 43,000 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 230,000 people in Austria. The gross value-added amounts to 19 billion euros annually.



The European transportation and logistics industry is facing profound economic, technological, and geopolitical upheavals. The geopolitical situation is more volatile than ever: the war in Ukraine, conflicts in the Middle East, attacks on global supply chains and trade routes, increasing geo-economic rivalries, and the growing use of trade and infrastructure as tools of geopolitical power are creating new uncertainties for the economy and transportation. At the same time, protectionist tendencies and industrial policy measures by major economic blocs are intensifying international competitive pressure on Europe.

As both the Letta Report on the Future of the Single Market and the Draghi Report on European Competitiveness highlight, Europe continues to suffer from fragmented regulations and technical standards, excessive bureaucracy and reporting requirements, high energy costs, labor and skilled worker shortages, deficits in digitalization and infrastructure, and dwindling industrial competitiveness. At the same time, the state-supported industrial and trade policies of other economic blocs - particularly China and, increasingly, the United States - are heightening the pressure on European companies.

Europe therefore needs a fresh start in economic and competition policy. Competitiveness, security of supply, strategic resilience, and the transition away from fossil fuels must be pursued as equally important priorities in the future. To ensure that European companies can continue to operate successfully, invest, and create jobs even in an increasingly uncertain global environment, European policymakers must create the necessary framework conditions.



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		Themengebiet	Top Vorschläge
Zukunft, Strategie und Energie		<u>European Terminal Strategy</u>	Minimum standards for space, capacities, operating times, cost and price for the unaccompanied combined transport (UCT) Extension of operating hours to 24/7 Promoting new technologies and automation
		<u>EU-Infrastructure</u>	Project prioritisation in infrastructure funding Funding instruments for public transport and urban mobility infrastructure
		<u>Danube Navigation Channel Maintenance</u>	Discharge depth of 25 dm available all year round at regulatory low water in the Danube waterway European authority with executive powers to remedy infrastructure deficiencies more efficiently
		<u>Labour shortages</u>	Practice of the driving profession in the training phase Modernize the minimum age for all modes of transport Employment of drivers from third countries
		<u>Energy Roadmap EU</u>	Development of a European energy roadmap Commitment to importing renewable energy Alternative fuels - openness to technology Hydrogen as a solution for the future
		<u>RED III - Expansion of renewable energy</u>	Consideration of other climate-neutral forms of energy for security of supply
		<u>ETS 2</u>	Relief measures for transport Earmarking of revenue from ETS 2
		<u>Fleet limits</u>	Use of alternative fuels Openness to technology Rejecting the ban on combustion engines for cars
		<u>Defossilization</u>	Using Ukraine's pipelines for hydrogen Promotion of SAF and eFuels Expansion of the EU hydrogen infrastructure Inclusion of the fuel in infrastructure tolls Mobilising green finance for the transport transition
		<u>Greening Corporate Fleets</u>	No obligation to purchase zero-emission vehicle fleets
Infrastruktur und Kombiniertes Verkehr		<u>TEN</u>	Timely completion of the TEN-T network Coordination of construction measures Keeping alternative routes free in the event of disruptions
		<u>Combined Transport</u>	Review of alternative methods for defining combined transport Clear specifications for the rail compatibility of road vehicles Inbound and outbound routes by regional providers with zero-emission vehicles

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

		<u>EU-Procurement Guidelines</u>	Continuation of in-house procurement Harmonisation of requirements
		<u>Easing regional burdens - Geoblocking</u>	Relieving the burden on regions through local rates
		<u>Successful night train</u>	Reduction of tolls for night trains and introduction of a night segment PSO support
		<u>Innovation in rail freight transport</u>	Digital Automatic Coupling (DAK): EU-wide company-friendly introduction European Train Control System (ECTS): EU-wide introduction in a way that is compatible with existing companies

Future & Strategy

1. European-Terminal Strategy

Legislative Act / Status of the Legislative Process: “Directive on Combined Freight Transport,” Proposal to Amend Regulation 2020/1056 and Directive 92/106/EEC - COM (2023) 702; the Commission’s 2026 Work Program calls for the proposal to be withdrawn; a formal decision is still pending; procedure number: 2023/0396/COD

I. General Remarks:

Unaccompanied Combined Transport (UCT) utilizes road and rail modes of transport according to their inherent strengths, i.e. rail for long-distance transport and road for short-distance for flexible collection and last-mile distribution and thus contributes to a reduction in CO₂ emissions. To establish a foundation for the quality and efficiency of UCT, certain minimum requirements must be defined for the infrastructural, operational, and financial aspects of the transportation sector. These standards are intended to ensure that certain facilities are sufficiently sized, have adequate capacity, are available 24/7, and can be used at transparent and competitive costs and prices.

II. Specific Proposals:

- **EU-wide Standardized and Harmonized Requirements**

To increase the efficiency of combined transport, EU-wide standardized and harmonized requirements should be introduced. This would help reduce the complexity of the combined transport system and improve interoperability between different countries and regions.

Logistics is inconceivable without information technology. A system such as combined transport, which involves a large number of partners, requires each link in the chain to have, above all, efficient IT solutions to ensure the quality of all processes. It is precisely in this area that there is a great need for improvement in combined transport. Despite good solutions and examples of successful projects, the lack of consistency among the systems is particularly problematic. Since there are no end-to-end systems, combined transport cannot fully realize its potential for its customers.

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

To meet customer needs and align with train schedules, terminal operating hours within the EU should be extended. An expansion to 24/7 operation would prevent peak capacity utilization and lead to a more efficient European business environment.

- **More environmentally friendly terminals**

The use of low-emission or zero-emission powertrains for handling equipment, such as electric, LNG, CNG, or hydrogen engines, must be promoted at the 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 financial support, the costs of transitioning to these technologies are often too high for terminal operators.

- **Expanding Terminal Capacity and Area**

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 roads. As a general rule, the area of a UCT terminal should be at least 10 hectares; for large and, above all, trimodal terminals in economically important regions, the area should be at least 50 ha. Ideally, the area should be expandable to meet future demand.

- **Promote new technologies and automation**

There is a wide range of new technologies (such as craneable semi-trailers, reach stackers, and gantry cranes) and new loading systems (such as the Lohr Railway System and Cargobeamer, which enable the horizontal loading and unloading of semi-trailers and tractor-trailers) that help automate and optimize processes at transshipment facilities. These must be promoted and harmonized at the European level. In addition, the automation of terminal operations through the use of semi-automatic and fully automatic equipment such as automated RTGs, automated RMGs, and automated TTs should be promoted at the European level.

2. European Transport Infrastructure

Legislative act / Stage in the legislative process: Commission proposal for a regulation establishing the 'Connecting Europe' Facility for the period 2028-2034; procedure number 2025/0221(COD).

I. General remarks:

The Commission's proposal for the EU budget for 2028-2034 (MFF) provides for a significant increase in funding for the Connecting Europe Facility (CEF) for transport and energy, with a planned total budget of over € 81 billion, compared to € 42.3 billion in the current MFF.

We welcome this approach. CEF is a key instrument for implementing the European Green Deal and for strengthening competitiveness, resilience and connectivity of the European Economic Area. Greater integration of civil and military transport networks improves both Europe's defence capabilities and the resilience of critical infrastructure. Dual-use projects, that is, projects with both civil and military benefits, should therefore be specifically utilised as part of a European infrastructure initiative. This applies in particular to the expansion of rail transport corridors (e.g. high-speed lines and capital city connections), the harmonisation of technical standards through digital automatic coupling (DAC) and the European Train Control System (ETCS), as well as investment in digital logistics solutions for the efficient coordination of civil-military mobility.

With two new strategies, the European Commission is establishing a comprehensive framework for competitive and resilient ports.

In March 2026, the European Commission published the [EU Ports Strategy](#). Together with the [EU Industrial Strategy](#) for the Maritime Economy, which was presented at the same time, it aims to strengthen the competitiveness, sustainability, decarbonisation, safety and resilience of the European shipping sector. The Commission is establishing a strategic framework for the further development of ports, infrastructure and maritime value creation. In this context, EU ports are increasingly seen as much more than mere transshipment centres. They are evolving into hubs for industry, innovation, energy supply, security, defence and the so-called 'blue economy'. This encompasses all economic activities directly or indirectly linked to oceans, seas and coasts. To accelerate this transformation, the Commission intends to promote innovation, digitalisation and closer integration of ports with other modes of transport. Guidelines are also planned for foreign ownership of EU ports, as well as for EU funding and investment in ports in third countries. These strategies also offer opportunities for inland ports and inland waterway transport in Austria.

In the field of non-maritime transport infrastructure, financial commitments are being made in particular within the framework of China's 'Belt and Road Initiative'. Influence is also exerted through the provision of services along key transport corridors.

These investments are attractive as they often contribute to the modernisation and expansion of infrastructure and terminal capacities. However, they also harbour significant risks, in particular dependencies, cyber and data protection risks, economic coercion and geopolitical influence. It is therefore essential that European infrastructure remains under

European control in order to ensure security, high-quality standards and geopolitical autonomy.

The EU should protect its interests and those of its neighbours by supporting investment in transport infrastructure, particularly in candidate countries and within the framework of European territorial cooperation. However, financial support should be conditional on stricter requirements regarding investment control, the greatest possible transparency in investment agreements, and the consistent enforcement of labour, environmental and social standards.

II. Specific proposals:

- **Project prioritisation in funding**

We continue to see room for improvement in terms of accessibility, project prioritisation and eligibility for funding. Access to funding must be made easier, particularly for smaller infrastructure projects of national significance that are of great economic importance or make a significant contribution to European interoperability.

Funding should prioritise the closure of transport gaps and cross-border sections (e.g. access routes to the Brenner Base Tunnel), as well as projects with high strategic added value (e.g. military mobility or energy connections). Similarly, projects at an advanced stage of development should be given priority to ensure the efficient and rapid utilisation of funds.

- **Targeted funding instruments for public transport and urban mobility infrastructure**

We welcome the continuation of the Connecting Europe Facility (CEF) in the next Multiannual Financial Framework and continue to call for targeted funding instruments for, amongst other things, public transport and urban mobility infrastructure.

CEF Transport plays a key role in the implementation of the TEN-T Regulation, which also covers cities. For the next funding period 2028-2034, we strongly advocate that urban transport hubs remain eligible for funding. In particular, urban rail infrastructure projects should receive adequate financial support in the framework of TEN-T. Between 2024 and 2020, only € 330 million in CEF funding was allocated to local public transport projects, which is equivalent to just 1 per cent of the total CEF Transport programme.

3. Coordination of maintenance measures for the navigation channel along the entire length of the Danube

I. General remarks:

At present, it is not possible to utilise cargo vessels to their full capacity on the Danube waterway. Yet expanding navigability and enhancing the competitiveness of the Danube as a waterway is of great importance not only regionally but also at European level.

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

II. Specific proposals:

- **Guaranteeing a draught of 25 decimetres throughout the year during regulated low water periods**
To increase competitiveness, a draught of 25 decimetres low navigation and regulation level (LNRL) should be guaranteed throughout the year. This is because low water levels can restrict the maximum loading capacity of vessels and lead to transport bottlenecks. A continuous and reliable draught is therefore crucial to ensure the efficient utilisation of cargo vessels.
- **Establishment of a European authority with executive powers to address infrastructure deficiencies more efficiently**
We call for the accelerated implementation of maintenance works and a more efficient resolution of infrastructure deficiencies along the Danube waterway. However, not all riparian States remedy obstructions in their territory swiftly. An effective European authority with executive powers to ensure that such obstructions are swiftly removed and to guarantee the continued navigability of the Danube for businesses is missing. This authority would monitor the specified fairway parameters in the Danube region and be able to determine and enforce consequences in the event of non-compliance with binding agreements. The establishment of such an institution is of crucial importance for ensuring smooth shipping and navigability on the Danube.
- **Promoting European and international cooperation**
We would welcome the European Commission promoting international cooperation amongst all parties in order to ensure the navigability of the entire Danube route. The financial requirements for implementing the Danube Action Programme must be taken into account in the budget on an ongoing basis.

4. Labour shortages in the transport sector

Legislative act / Stage of the legislative process: The Professional Drivers Directive (Directive 2022/2561) has been in force since December 2022. The latest amendment to the Driving Licence Directive (Directive 2025/2205) was published in November 2025. The Directive on the certification of train drivers (Directive 2007/59/EC) was last amended in 2019.

I. General remarks:

Well-trained staff are the business card of any company and contribute to the company's overall success and to the quality of the business location in general. Increasingly, the qualifications and skills of staff are a decisive competitive factor, particularly in the mobility sector. In recent years, a growing labour shortage in the mobility sector has become apparent across Europe. According to the results of a survey by the IRU, there is a shortfall of around 425,000 drivers across Europe. The age profile of existing drivers in Austria (with many due to retire) also points in this direction.

In order to support the mobility and transport sector as basis of the economic activities and society in general with a sufficient supply of qualified workers, various measures are therefore necessary, including amendments to the Professional Drivers Directive (e.g. an easier career start, a reduction of red tape and improved framework conditions).

With regard to the latest amendment to the Driving Licence Directive, we welcome the provision allowing accompanied driving of lorries from the age of 17 under certain conditions, the possibility of driving alternatively powered vehicles up to 4 250 tonnes with a Category B licence, and the refraining from mandatory health checks. However, further significant changes still need to be implemented to ensure a level playing field and fairer competition.

II. Specific proposals:

- **Minimum age for train drivers:**

A key measure to tackle the labour shortage in local public transport would be to lower the minimum age for train drivers to 18 across the EU. Currently, Directive 2007/59/EC determines a minimum age of 20, from which Member States may deviate only within their own territory.

- **Minimum age for bus drivers**

Regrettably, the issue of the minimum age for passenger transport was overlooked when the Driving Licence Directive was last amended. No steps have been taken to address the increasingly serious problem of driver shortages in this sector either. The aim should certainly be to align the minimum age for commercial bus drivers (D95 and DE 95) with the age of 18 that is applicable to lorry drivers.

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

We welcome that the European Commission has taken up our suggestion regarding L17 for Category C in its proposal and has made accompanied driving

possible for drivers who have reached the age of 17. Regrettably, the mandatory introduction was watered down to a 'discretionary provision' in the final version.

We therefore propose the mandatory introduction, harmonised across the EU, following an evaluation period. We consider this measure to be a significant boost to the recruitment of lorry drivers.

- **Employment of drivers from third countries**

A further step would be the creation of seasonal quotas to enable foreign workers to take up employment in the freight transport sector quickly and without red tape.

- **Prospective professional drivers without basic training (holding only a driving licence) should be able to practise the profession for one year, provided they complete the basic training during that first year.**

Access to the profession should not be made any more difficult. We propose that prospective drivers without a basic qualification (holding only a driving licence) should be able to work in the profession for one year, whilst completing the basic qualification during that first year. This would generate greater interest in the driving profession and facilitate entry into the profession.

- **Take into account the specific characteristics of e-learning for professional drivers:**

We welcome the option, explicitly included in EU Directive 2022/2561, to complete further training content voluntarily via e-learning. Unfortunately, the specific legal provisions in the Directive are not very practical and should be adapted according to the specific characteristics of e-learning: For example, the general requirement that a continuing professional development module must be completed within two days fails to take into account the advantages of e-learning; namely, that the content covered in a module can be learnt and revised in smaller sections over a longer period (e.g. three months).

5. European Energy Roadmap - Strategic planning for energy supply

Legislative act / Stage of the legislative process: Previous EU strategies and legislative acts on energy

- Communication from 2025: European Grids Package, COM(2025) 1005 - Streamlining procedures, as provided for in the Grids Package. We welcome this Communication as it is absolutely essential for the energy transition.
- Communication from 2025: Action Plan for Affordable Energy, COM(2025) 79
- Communication from 2024: Recommendation on achieving climate neutrality by 2050, COM(2024) 63 - new interim target: a 90% reduction in GHG emissions by 2040 compared with 1990 levels
- RePowerEU from 2022 (COM(2022) 108): following Russia's invasion of Ukraine, four pillars for energy supply: energy savings; diversification of energy supply; renewable energy; financing
- 'Fit for 55' package from 2021: target of a 55 per cent reduction in GHG emissions by 2030; the package also covers 'clean energy': the Renewable Energy Directive (RED), the Energy Efficiency Directive, the Gas Package, and the Energy Performance of Buildings Directive
- European Climate Law of 2021 (Regulation 2021/1119): net-zero target by 2050 in the EU
- European Green Deal of 2019 (COM(2019) 640); net-zero target by 2050 in the EU
- EU Communication of 2018 (COM(2018) 773) setting out the long-term strategic vision 'A Clean Planet for All': eight scenarios and seven strategic building blocks on the path to the net-zero GHG target by 2050, including one on clean mobility
- Energy Roadmap 2011 (COM/2011/0885): A precursor strategy (aiming for an 80-90 per cent reduction in GHG emissions by 2050 compared with 1990 levels), which outlines how the EU's energy system can be largely decarbonised by 2050; four key decarbonisation pathways: energy efficiency, renewable energy, nuclear energy and CCS.

I. General remarks:

The decarbonisation of transport requires a far-reaching transformation, moving away from fossil fuels and towards alternative propulsion systems and green fuels. The mobility transition cannot succeed without an energy transition. The necessary framework conditions must be put in place to achieve this. A sustainable energy supply must be ensured, alternative infrastructure must be expanded, and secure and resilient electricity grids must be guaranteed through grid expansion. From the transport industry's perspective, it is important that green energy (electricity, fuels) is available and affordable for businesses. If energy costs cannot be calculated in advance, sustainable business operations are simply not possible. The European legislator must therefore demonstrate pragmatism and flexibility,

also regarding climate targets - as EU Climate Commissioner Hoekstra has already called for. An open approach to technology is imperative.

II. Specific proposals:

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

- **European Energy Roadmap**

In order to provide businesses with alternatives as they transition to non-fossil fuels, a European Energy Roadmap should set out when and in what quantities fossil fuels are to be replaced by renewables, and set a target price range.

- **Expansion of renewable energy - energy imports**

The energy transition requires a massive expansion in renewable energy generation. The electrification of industry, transport and other sectors is leading to an enormous increase in demand for green electricity, which Europe cannot produce on its own despite the expansion of renewables. Energy imports will therefore be necessary. There are far more productive locations worldwide for the production of wind and solar power than in Europe, particularly in the Middle East, North Africa and elsewhere. The primary energy produced there can be converted into energy carriers such as methane or synthetic fuels, stored and transported to Europe in this form. Imported e-fuels and LNG/CNG can be used as transitional technologies, particularly for the decarbonisation of heavy goods transport.

- **Alternative fuels - an open approach to technology**

From the perspective of the transport sector, it is absolutely essential to exploit all possibilities for decarbonisation. The transport sector requires a package of measures (hydrogen, e-mobility, synthetic fuels, e-fuels, etc.). Whilst electric mobility is important in the transport sector, it is only part of the solution. In areas where electric propulsion is difficult to implement, hydrogen, synthetic fuels (e-fuels), LNG, CNG and biofuels can make a valuable contribution to reducing CO₂ emissions in transport. These alternatives are also important for existing fleets with combustion engines and must absolutely remain eligible for the fulfillment of fleet targets for lorries. In line with the principle of technological openness, alternative fuels (e-fuels, H₂, biofuels) must be given greater recognition in the decarbonisation of transport.

- **Hydrogen as a solution for the future**

From the perspective of the transport sector, hydrogen mobility is a promising approach to decarbonising heavy goods transport and is also relevant to the production of sustainable aviation fuels (SAF), which are essential for green aviation. Hydrogen mobility should therefore be promoted more strongly at EU level. However, hydrogen as a solution for the future requires large quantities of green electricity and significant investment. That said, the strict requirements of the Renewable Energy Directive (RED III) regarding the additionality criterion (see [Point 6. RED III](#)) for renewable hydrogen must be viewed critically, as climate-neutral and low-carbon hydrogen are also likely to 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. Care must therefore be taken to ensure the rapid EU-wide implementation of the AFIR requirements for hydrogen refuelling infrastructure. In addition, infrastructure projects such as the 'SouthH2 Corridor' - an infrastructure project for hydrogen transport over 3,300 kilometres from North Africa to Europe - must be realised and actively promoted.

- **Funding for the expansion of hydrogen infrastructure within the EU**

- **Secure funding**

Infrastructure expansion (grid expansion) or new technologies such as hydrogen technology require significant investment. The European Hydrogen Bank is an important initiative for promoting hydrogen production in Europe and the import of renewable hydrogen. EU funding instruments such as CEF Energy, which supports cross-border energy infrastructure, are also to be welcomed. In addition to optimising the design of EU funding instruments, it is also important that these instruments facilitate meaningful coordination between EU funding and national support schemes. For example, the European Hydrogen Bank offers Member States the opportunity to make national funds available for the auctions. This is an efficient way, compliant with the State Aid Guidelines, of providing operational support for national production facilities. Austria has made its own budgetary funds available for such national auctions under its Hydrogen Promotion Act.

6. RED III - Expansion of renewable energy

Legislative act / Status of the legislative process: Directive 2023/2413 was published in the Official Journal of the EU on 31 October 2023. A review of the Renewable Energy Directive (RED III) for the period after 2030 is currently planned.

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 fundamentally transform its energy system. With the Renewable Energy Directive (RED III), which came into force on 20 November 2023, the European targets for the expansion of renewable energy have been significantly raised.

Member States must ensure that the share of renewable energy in the European Union's gross final energy consumption reaches at least 42.5 per cent by 2030; in addition, an EU-wide overall target of 45 per cent is being pursued. The targets for the transport sector have also been significantly tightened. Member States have the choice between reducing greenhouse gas intensity in the transport sector by 14.5% by 2030 or ensuring that the share of renewable energy in the transport sector's final energy consumption is at least 29%. In addition, RED III sets a binding sub-target of 5.5 per cent for advanced biofuels and electricity-based renewable fuels (Renewable Fuels of Non-Biological Origin, RFNBOs).

With a view to achieving the climate and energy targets beyond 2030, the European Commission is already preparing the review of RED III. In the run-up to this, a public consultation was held on the future shape of the European legal framework for renewable energy. The forthcoming RED review must be used to create a technology-neutral and practical framework for the decarbonisation of transport. It is essential to ensure the competitiveness of Europe as a transport hub, the availability of renewable energy sources, uniform conditions across the EU, and greater consideration of renewable fuels.

II. Specific proposals:

- **Certification of renewable fuels**

With a view to 'improved certification and traceability measures for renewable fuels', we favour a uniform approach across the EU by Member States. Only problems that have actually been identified should be used as a basis for reviewing certification and traceability measures for renewable fuels. At EU level, it is important to establish regulations that place the use of renewable fuels on an equal footing with other technologies, such as e-mobility, by adopting a technology-neutral approach.

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

In this context, the competitiveness of transport operators must be considered. Affordable energy prices and the availability of renewable energy must be guaranteed as part of the decarbonisation of transport, when transport operators switch to alternative vehicles.

- **Security of supply also through 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 in the interests of security of supply.

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

It is to be welcomed that renewable hydrogen is set to play a greater role with the strengthening of renewable fuels of non-biological origin (RFNBOs). However, it is a cause for concern that, during the necessary market ramp-up phase, the principle of additionality is being tightened. This approach must be critically scrutinised, as hydrogen mobility represents a promising solution for the decarbonisation of transport in order to achieve climate neutrality, and its roll-out could thereby be delayed or hindered.

7. European Emissions Trading System for Transport and Buildings - ETS 2

Legislative act / Stage in the legislative process: Directive 2003/87 establishing a scheme for greenhouse gas emission allowance trading was published in 2003. From 1 January 2027, the European Emissions Trading Scheme will be expanded to include ETS 2.

I. General remarks:

ETS 2 covers emissions from energy consumption in the road transport, buildings, industrial and energy installations sectors that are not covered by ETS 1. The European Emissions Trading Scheme for Transport and Buildings (ETS 2) will replace the national CO₂ pricing scheme under the National Emissions Trading Act. In the context of the forthcoming ETS 2 review, greater consideration should be given to the impact on the competitiveness of the European transport sector and the transformation of transport. ETS 2 is designed as a market-based emissions trading scheme. Unlike administratively set CO₂ pricing, the price of emission allowances will in future be determined by the market. As a result, the transport sector can expect to face additional cost burdens due to rising energy and fuel prices.

The decarbonisation of transport is a key objective of European climate and energy policy. At the same time, it must be ensured that transport and logistics companies remain competitive in the future and have sufficient financial leeway to make the necessary investments in alternative propulsion systems, vehicles and energy sources.

The forthcoming ETS 2 review offers an opportunity to assess the practicality of existing regulations and to ensure that the additional burdens on businesses are mitigated through appropriate accompanying measures. Particular attention must be paid to ensuring that the revenue generated by ETS 2 is used to support the transformation of the transport sector.

II. Specific proposals:

- **Earmarking of revenue from ETS 2**

Revenue from ETS 2 must not be channelled into general budgets but must be earmarked for specific purposes. The funds are intended to directly benefit those businesses affected by the additional cost burdens and to be used specifically for measures aimed at decarbonising transport. These include investments in alternative propulsion technologies, renewable fuels, vehicle fleets and the necessary energy and refuelling infrastructure.

8. Fleet limits - technology neutrality instead of banning combustion engines

Legal act / status of legislative procedure: Proposal for a regulation amending Regulation (EU) 2019/631 setting CO₂ emission performance standards for new passenger cars and new light commercial vehicles, as well as proposal for a regulation amending Regulation (EU) 2019/1242 setting CO₂ emission performance standards for new heavy-duty vehicles; procedure numbers 2025/0420(COD) and 2025/0423(COD).

I. General remarks:

CO₂ emission standards for passenger cars and light commercial vehicles

In April 2023, CO₂ emission standards for new passenger cars and light commercial vehicles were tightened. Under these rules, new passenger cars and light commercial vehicles were to become emission-free from 2035. This was widely regarded as a de facto “end of the combustion engine”.

With the Automotive Package presented in December 2025, the European Commission has now proposed a fundamental adjustment of this approach. In the future, automotive manufacturers will have to meet an emission reduction target of 90% compared with the reference value from 2035. The remaining 10% may be compensated through offsetting mechanisms, in particular by crediting sustainable renewable fuels and low carbon steel. Additional flexibilities for complying with the targets will also be created.

From the perspective of the transport industry, this is an important step in the right direction, as it recognises that decarbonisation cannot be achieved solely through vehicle technologies but also through CO₂-neutral energy carriers and value chains. However, the planned openings remain limited. The departure from the previous 100% target proposed in the Automotive Package is an important step towards technological openness. Nevertheless, the proposed offsetting mechanisms are too narrow. Further flexibilisation is required in order to fully exploit the potential of CO₂-neutral fuels and other technological solutions.

CO₂ emission standards for heavy-duty vehicles (lorries and buses)

Regulation (EU) 2024/1610 sets emission standards for heavy-duty vehicles (lorries and buses). For new heavy-duty vehicles, with the exception of city buses, it provides for emission reductions of 45% from 2030, 65% from 2035 and 90% from 2040. For new city buses, an emission reduction of 100% applies from 2035.

As part of the political compromise, it was agreed to develop a methodology for approving heavy-duty vehicles that are operated exclusively with CO₂-neutral fuels. This could allow lorries running on e-fuels or advanced biofuels to be taken into account in the future alongside electric and hydrogen vehicles. This would open up the possibility of keeping CO₂-neutral combustion technologies in the market in the long term.

The Automotive Package did not change the CO₂ targets for heavy-duty vehicles. It merely proposed additional flexibility for manufacturers: emission credits can be accumulated more easily in the years 2025 to 2029 and used later to comply with the targets. This is intended in particular to take account of delays in the development of charging and refuelling infrastructure. The level of ambition of the regulation remains unchanged; the existing CO₂ reduction targets are not adjusted.

II. Specific proposals:

- **Technological openness**

In the defossilisation of the transport sector, the principle of technology neutrality must be taken into account more strongly. In order to achieve the CO₂ reduction targets, a broad bundle of technologies and energy carriers must be used. In addition to battery-electric mobility, this includes the use of hydrogen-powered vehicles as well as modern combustion engines using biofuels, synthetic fuels or hydrogen.

- **Use of alternative fuels in combustion engines**

Biofuels and synthetic fuels (e-fuels) play an important role in the defossilisation of road transport. CO₂-neutral fuels such as biogas, biofuels and synthetic fuels can contribute significantly to CO₂ reductions and to improving air quality. In order to achieve the climate targets in transport, we need renewable fuels with a lower CO₂ footprint in addition to the further ramp-up of e-mobility. This applies above all in cases where electric lorries or hydrogen lorries cannot be used, or can only be used with difficulty. 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 for sustainable fuels. Increased blending of sustainable CO₂-neutral fuels, for example first-, second- and third-generation biofuels as well as RFNBOs and RCFs, can significantly reduce the CO₂ emissions of the fleet.

- **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.

- **More pragmatism and flexibility**

Further flexibilisation and more pragmatism are necessary. In addition to the reluctance of market participants, there are also real market barriers that must be removed before e-mobility can become established. If climate protection in transport is to make progress, greater account should be taken of existing potential, such as renewable fuels, and of actual trends, such as purchasing behaviour, the popularity of hybrid vehicles and continued reliance on combustion engines.

9. Accompanying suggestions for the defossilisation of transport

I. General remarks:

Building on the Green Deal, the European Union will continue to pursue the path of a green transition in the coming years. EU energy and climate targets must be reconciled with the objective of long-term competitiveness so that the defossilisation of transport can succeed in the future.

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

In order to achieve the climate targets, substantial additional investment will also be required in the transport sector. The investment needed 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, not least because of its potential to produce green hydrogen. In addition, the political and economic integration of Ukraine into the EU-27 is an important objective.

II. Specific proposals:

- **Mobilise green finance for the transport transition / secure funding for additional investment in transport**
To secure the high level of investment required, a mix of measures and funding instruments with incentive and leverage effects is needed. In the mobility sector, start-up financing is particularly necessary for the transition to climate-neutral drive systems. As long as alternative drive systems in the lorry sector are not yet economically viable, there is no incentive for a large scale transition. In order to place the transition to vehicles with climate-neutral drive systems and the use of renewable energy in public, commercial and private passenger and freight transport on a broader footing, current funding programmes such as the Austrian ENIN and EBIN should be expanded into a Mobility Future Fund financed from national and EU funds. In addition to subsidies and tax incentives, new green finance instruments should be established in order to make greater use of private capital for financing the transport transition. Public-private partnership models could also usefully complement the mix of measures. The EU must create the framework for new green finance instruments, financing models and permissible subsidies.
- **Expand energy infrastructure in Ukraine**
In rebuilding Ukraine, the opportunity should be used to fill the existing pipeline infrastructure to Austria with green hydrogen produced in Ukraine.
 - Support for economic investments that ensure the rapid expansion of Ukraine's energy infrastructure.
 - Future investments should also be channelled specifically into the renewal and conversion of Ukraine's gas network infrastructure so that it can be

adapted and made fit for transporting green hydrogen. Further integration of Ukraine into the European single market and the creation of an attractive business environment would accelerate such investments.

- **Expand funding**

Subsidies and financing instruments as incentives must be increased accordingly, and suitable framework conditions must be created at European level:

- Increase the efficiency of existing technologies by supporting **bridge technologies** for achieving CO₂ neutrality.
- Support of industrial production of **e-fuels**.
- Increase of national funding for alternative drive systems in the transport sector that is permissible under EU state-aid law, for example in Austria through **EBIN and ENIN**.

- **Taking the type of fuel into account in infrastructure tolls**

Directive (EU) 2022/362 on road charging (Eurovignette Directive) provides that Member States may levy a charge for the use of infrastructure that must be differentiated according to a vehicle's CO₂ emissions. In order to create appropriate incentives and increase the economic viability of alternative fuels, the type of fuel used should be taken into account on a mandatory basis so that alternative fuels receive substantial relief.

- **Support for innovative logistics (*Green Logistics*)**

Stronger and more targeted support for **innovative logistics (*Green Logistics*)**. Examples include support for innovations up to market maturity, funding for alternative drive technologies, improved aerodynamics and simplified type approval.

- **Fleet support programme for inland navigation in freight and passenger transport**

Targeted research and funding priorities should enable an early transition to the latest vessel technology. Existing funding programmes for environmentally friendly fleet modernisation should be continued and expanded, as engine retrofitting for passenger vessels is currently not supported at all. This would strengthen the performance and competitiveness of domestic inland navigation. However, this can only be achieved through public-sector start-up funding, as individual shipping companies are not able to manage this without adequate support.

10. Greening corporate fleets (clean corporate vehicles)

Legal act / status of legislative procedure: The Commission presented a proposal for a regulation on the greening of corporate fleets (clean corporate vehicles) in December 2025; procedure number 2025/0421(COD).

I. General remarks:

The Commission proposal aims to accelerate the transition to zero-emission vehicles in corporate fleets. From 2030, binding national targets are planned for the share of zero-emission or low-emission company cars and vans in new registrations by large companies. The obligations are addressed to the Member States, which shall ensure the achievement of targets through appropriate measures such as tax incentives, subsidies or toll advantages; SMEs are exempt and lorries are currently not covered by the scope. In addition, from 2028 Member States should no longer grant financial support for company vehicles with conventional drive systems, while public funding should in future be limited to vehicles considered “Made in the European Union”. It is expressly welcome that the Commission proposal does not include new rules for bus fleets. With the Clean Vehicles Directive and the Austrian Road Vehicle Procurement Act, a binding legal framework already exists that requires public-sector bus fleet operators to comply with quotas for clean and zero-emission vehicles.

The transport sector is intended to contribute to achieving climate targets. However, the purchase of a vehicle by companies, such as company cars, rental car and taxi fleets or large logistics lorry fleets, follows different criteria than a private purchase. Companies have different operational requirements and different needs regarding charging infrastructure.

II. Specific proposals:

- **No mandatory requirements**

We reject mandatory quotas for the electrification of corporate fleets and instead advocate a voluntary, technology-open framework. The national targets provided for in the Commission proposal would create considerable implementation pressure on companies without sufficiently taking into account the different operational requirements, investment cycles and economic framework conditions. Priority should therefore be given to expanding charging and refuelling infrastructure, creating reliable framework conditions and establishing non-discriminatory incentive systems that are equally accessible across all fleet sizes in order to advance the transformation in a market-based and economically viable manner.

- **Clear exemptions**

In the ongoing negotiations, clearly defined exemptions should be provided for vehicle types that currently cannot be converted to battery-electric drive systems due to technical or operational requirements. This applies in particular to vehicles used in breakdown and standby services, vehicles that must remain operational in the event of a blackout, and vehicles that require energy in addition to normal vehicle technology, for example units for pumps, welding equipment or lifting gear.

Infrastructure and Combined Transport

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

Legal act / status of legislative procedure: 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:

It is essential that Member States promptly complete the TEN-T network and the necessary access routes to the TEN-T axes. The corridors in the TEN-T core network (2030) and extended core network (2040) that are directly relevant for Austria are:

- Baltic-Adriatic Corridor (southern route, including the Northern Railway)
- Scandinavian-Mediterranean Corridor (Brenner Corridor)
- Rhine-Danube Corridor (western route, including the Eastern Railway)
- Orient/East-Med Corridor (Northern Railway and Eastern Railway)
- Alps-Western Balkans Corridor (Tauern and Pyhrn-Schober axis)

Member States must not cause procedural delays for infrastructure measures, particularly in the freight corridors mentioned above.

Against the background of efforts at European level to promote intermodal freight transport and, in particular, combined transport through incentives to increase the share of freight carried by rail, the smoothest possible functioning of the important freight corridors in the core network and the extended core network must be ensured. Long outages and disruptions in the rail network run counter to this objective.

For necessary rehabilitation projects in important freight corridors, all available options must be used in project planning, tendering and procurement procedures - including construction-lot size, award criteria such as time, and construction execution - in order to ensure accelerated implementation. For example, the rehabilitation measures on the important corridor section Nuremberg-Regensburg and Obertraubling-Passau from 2026 are expected to involve a closure lasting several months (nine months), without sufficient capacity being available on diversion routes. This would entail serious disadvantages for Austria as a business location.

II. Specific proposals:

- **Consultation and monitoring mechanism**
Establishment of a consultation and monitoring mechanism for rehabilitation and maintenance works on the high-level rail network in order to avoid long construction periods and rail network outages. Forward-looking and steering capacity management on diversion routes, as well as monitoring of additional costs at EU level, should be provided. To fulfil this task, Member States should be required to publish multiannual plans defining construction and rehabilitation measures with a secured financing framework.

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

The rapid expansion of the access routes to the Brenner Base Tunnel is particularly important, because without sufficient connections via access routes on German and Italian territory, the tunnel's capacities cannot be used.

12. Combined Transport

Legal act / status of legislative procedure: “Directive on combined freight transport”, proposal amending Regulation 2020/1056 and Directive 92/106/EEC - COM(2023) 702; the Commission work programme for 2026 provides for the withdrawal of the proposal; a formal decision is still pending; procedure number: 2023/0396/COD

I. General remarks:

The Federal Division for Transport and Logistics considers strengthening combined transport to be one of its top priorities. Expanding and optimising combined transport is essential for achieving the ambitious climate targets for the transport sector set at EU level.

We to highlight the following approaches to promoting combined transport:

- The **framework conditions** for combined transport should generally be designed in such a way that they encourage both shippers and the transport industry to carry out cross-modal transport operations. In this context, the **trimodal linkage** of road, rail and inland waterways in the spirit of co-modality is important.
- **Terminal expansion for freight transshipment** must be advanced and supported through sustainable financing. In this context, accelerating approval procedures is urgently required.
- **Financial support** from Member States must be significantly increased, particularly in the areas of expansion and establishment of terminals and private sidings, investments in transport equipment such as craneable semi-trailers, container premiums, investments in innovative systems and technologies, etc. At EU level, the framework conditions must be created for waiving or permanently reducing **infrastructure access charges**.
- **Rail connections to seaports** in Northern and especially Southern Europe must be expanded. The EU should ensure that Member States actually expand the TEN network in accordance with the plans. For example, delays are occurring on the access routes to the Brenner Base Tunnel in Austria’s neighbouring countries, delaying full use of the tunnel’s capacity.
- Shifting freight transport to rail requires the **expansion of rail infrastructure** and the promotion of intermodal terminals and private sidings, combined with an innovation and automation offensive. Existing bottlenecks must be eliminated by expanding lines to four tracks. In infrastructure measures of pan-European importance, procedural delays caused by Member States must be prevented.
- Specifically, greater use is needed of innovations such as the **digitalisation** of ordering processes and operational handling, as well as the removal of operational obstacles at border crossings.
- Facilitate annual **technical inspections of trailers** across the European Union, regardless of the country in which the trailer is registered. This would support combined transport, as semi-trailers in particular could be transported more flexibly

and efficiently on other modes of transport, such as rail and ship, without having to be withdrawn from transport operations for longer than necessary.

- **Substantive coordination** of the EU Directive 92/106/EEC on combined transport, which is currently under revision, with the EU Directive 96/53/EC on weights and dimensions in road transport, which is also in the process of being amended.

II. Specific proposals:

Intermodal freight transport, calculation of external costs and aggregated data

With regard to the proposed changes, we note the following:

- **Reconsider the calculation methodology**
We call for a more critical approach to the systemic approach and to the **calculation methodology** for external costs. In any case, it must be ensured that the definition of external costs is consistent with the Eurovignette Directive. Alternative methods for defining combined transport should be examined.
- **Exemption from weekend, night-time and public-holiday driving bans**
In combination with rail as the main transport leg, exempting road transport from **weekend, night-time and public-holiday driving bans** can be a useful instrument for optimising the utilisation of terminal and rail infrastructure capacity, provided that appropriate checks are ensured to safeguard fair competition.
- **Exemption from driving bans in port hinterland areas**
However, exempting road transport from **driving bans also in port hinterland areas** in the context of short sea shipping would lead to a major competitive disadvantage for rail and is therefore viewed critically.
- **Approval of non-codified intermodal loading units**
The current proposal does not include an option for approving **non-codified intermodal loading units**, such as non-craneable semi-trailers.
- **Rail compatibility of road vehicles**
Clear requirements are needed for the **rail compatibility of road vehicles**, including craneability, shapes, dimensions and similar aspects.
- **Clear rules for state aid**
Clear rules are also needed for **state aid** (aid to reduce external costs, interoperability aid and investment aid for facilities) in Directive 92/106/EEC on combined transport and/or in the currently revised state-aid guidelines for the railway sector.
- **Pre- and post-carriage routes by regional providers**
In cross-border combined transport, exemptions from cabotage rules currently apply to road pre- and post-carriage routes. Unfortunately, the current draft directive amending the Combined Transport Directive does not envisage a departure from this practice.

However, precisely these shorter pre- and post-carriage routes would be particularly suitable for zero-emission vehicles (“ZEV”), 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 road pre- and post-carriage routes and subjecting the road transport share of combined transport to the conventional cabotage rules.

By creating incentives for regional providers to use ZEVs for pre- and post-carriage and thereby adopt green technologies, a decisive contribution can be made to the defossilisation of freight transport. This would also help strengthen the regional economy.

Weights and Dimensions

13. Revision of the Directive on Weights and Dimensions

Legal act / status of legislative procedure: Proposal amending Directive 96/53/EC laying down the maximum authorised dimensions in national and international traffic and the maximum authorised weights in international traffic for certain road vehicles circulating within the Community; trilogue negotiations began in December 2025; procedure number: 2023/0265/COD.

I. General remarks:

We expressly welcome the revision of the Directive on Weights and Dimensions, whose main objective is to increase the permissible gross vehicle 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 energy consumption per transport unit.

It is also particularly welcome that our demand to introduce five-axle solo lorries with a gross vehicle weight of 40 tonnes is reflected in the European Commission's proposal. Since the five-axle solo lorry with a gross vehicle weight of 40 tonnes is no longer mentioned in the latest compromise proposal, we expressly call for it to be reintroduced.

II. Specific proposals:

Current transport practice shows that the rigid system of axle loads and maximum authorised gross vehicle weight does not reflect practical realities; however, adjustments to the maximum authorised dimensions and weights of lorries and buses are necessary to increase efficiency.

- **Five-axle solo lorries with 40 tonnes**
These lorries are more efficient and therefore more environmentally friendly. In addition, due to their higher loading capacity and stability, better manoeuvrability and traction, and reduced road impact, they offer significant advantages.
- **Rail compatibility**
The Directive is also becoming particularly relevant in the context of promoting rail-based multimodal transport chains. This requires lorries and trailers to be adapted 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 for the greater use of craneable semi-trailers and to facilitate the shift of freight to rail, we call for a higher weight limit of 41 tonnes for craneable semi-trailers also for operations outside combined transport at EU level.
- **Longer lorries**
In order to achieve CO₂ savings in transport and increase the efficiency of transport operations, the use of longer lorries based on the German model could be examined. It should be taken into account that longer lorries with a larger transport volume may only be used on selected routes while complying with the currently applicable

maximum authorised gross weights, and only as a complement to, not in competition with, the existing offering in rail freight transport. The introduction of gigaliners, by contrast, is considered unrealistic in Austria.

- **Dimensions for car transporters**

The dimensions for car transporters should also be adjusted in the interests of increasing efficiency and reducing CO₂ emissions. If these were extended by only 60 cm, two additional vehicles could be transported.

- **12.5 tonne axle load for battery-electric vehicles**

We call for the axle load of battery-electric vehicles to be increased to 12.5 tonnes, as originally provided for in the Commission proposal. Since batteries significantly increase vehicle weight and, in particular, the load on the drive axle, raising the limit to 12.5 tonnes is intended to compensate for this additional technical requirement without reducing the payload of battery-electric vehicles.

- **Maximum axle load**

When complying with the maximum authorised gross vehicle weight, the maximum axle load, i.e. the technically highest possible axle load specified by the manufacturer, should be used as the basis for determining axle load, rather than the maximum authorised axle load, as is currently customary.

- **Bi-articulated buses**

We call for the length of bi-articulated buses and buses with trailers to be increased or aligned with those of extra-long bi-articulated trolleybuses of 25 metres.

- **Semi-trailer tractors**

Changes should be made to the **dimensions of semi-trailer tractors** so that they can be fitted with aerodynamic components.

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

For two-axle buses with alternative drive systems, the current maximum authorised weight of 19.5 tonnes should be increased by the additional weight required for the alternative drive technology.

14. Access to the profession - light goods transport sector: weight adjustment for alternatively powered vehicles

Legal act / status of legislative procedure: Regulation on access to the occupation (Regulation 1071/2009) and Regulation on access to the market (Regulation 1072/2009).

I. General remarks:

The issue of weight constraints for electrically powered light commercial vehicles deserves particular attention. Due to their higher unladen weight compared with conventional vehicles, operators face the challenge of either accepting a reduced payload or exceeding the 3.5-tonne limit.

Exceeding this limit would, however, have significant consequences, such as the need for an operating licence, triggered solely by the higher weight of a vehicle with an alternative drive system.

In order to ensure that the use of electric light commercial vehicles does not put companies at a disadvantage, compensation must urgently be created by law at national level and, above all, at EU level. This would establish a fair and balanced framework that facilitates and promotes the transition to more sustainable transport solutions.

II. Specific proposal:

We therefore propose adjusting the weight limit at EU level to 4.25 tonnes for alternatively powered vehicles in the relevant regulations, including the Regulation on access to the occupation and the Regulation on access to the market, so that no disadvantage arises from the higher unladen weight.

Such an adjustment would not only ensure equal treatment regarding the weight of alternatively powered 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.

15. Aviation and Single European Sky II plus

Legal act / status of legislative procedure: 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 Single European Sky 2+. While the European aviation industry is struggling 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 legal framework through SES 2+ helps eliminate these inefficiencies and improve European air traffic management (ATM).

The harmonisation of civil European airspace must continue to be pursued.

II. Specific proposals:

In our view the legal act does not yet go far enough and should therefore be regarded as an interim step. The following points remain open in any case:

- **Promote sustainable aviation fuels to market maturity**
Promoting the market maturity of sustainable aviation fuels can be achieved through various measures, including earmarking revenues from the ticket levy and the emissions trading system (ETS) in aviation. The aim of these support measures is to improve their availability and competitiveness on the market. A coherent EU strategy is needed for the targeted promotion of pilot projects and for creating 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 appointed by the European Commission to assist in the implementation of the performance and charging scheme of the Single European Sky (SES). The PRB consists of industry experts and issues recommendations to the Commission. It has also issued recommendations for the Union-wide target areas for the fourth reference period (RP4, 2025-2029) of the SES performance and charging scheme. We propose expanding the competences of the Performance Review Body (PRB) in order to enable a more effective assessment of performance within the framework of the Single European Sky.
- **Compensation in the event of failure to meet performance targets or SESAR implementation requirements**
The SESAR project (Single European Sky ATM Research) brings together the resources and expertise of civil and military stakeholders with the EU institutions in order to develop innovative technologies and working methods to improve ATM performance (Air Traffic Management). If SESAR objectives or requirements are not met, an entitlement to compensation should be provided in order to create an incentive for

those responsible to implement performance targets or SESAR implementation requirements on time.

- **Closer cooperation between national supervisory authorities is desired**
Instead of further equipping national supervisory authorities, they should consolidate and integrate their tasks beyond mere cooperation. Stronger harmonisation of standards and procedures across national borders would facilitate the future implementation of the Single European Sky (SES). In this context, pooling resources for specific projects within Functional Airspace Blocks (FABs) could be considered in order to increase efficiency and effectiveness.
- **Mandatory selection criteria for support service providers**
Such criteria are intended to ensure the quality and reliability of support services in European airspace and to establish a uniform aviation standard across Europe. The selection criteria should relate to safety standards, technical capabilities and efficiency standards.
- **The Network Manager should play a stronger role in facilitating network consolidation and rationalisation**
The Network Manager of the Single European Sky is the key actor for operational and technological network performance in the areas of capacity and flight efficiency. To counter increasing flight delays 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 during peak travel periods. Measures have also been included in Commission 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 by merging flight routes or simplifying operational procedures. The aim is to make the European air transport system more efficient and cost-effective.
- **Strengthening InterFAB initiatives and maximising operational efficiency in the FAB context (Functional Airspace Blocks)**
European airspace is divided into nine blocks which are intended to replace or consolidate national areas. The purpose of InterFAB coordination is to provide a structure facilitating coordination and cooperation between FABs, contributing to reduced fragmentation of European airspace, supporting optimisation of the European ATM Network (EATMN), and providing a working structure for this purpose. Initiatives such as InterFAB and FABEC (Cooperation for a Single European Sky) should be strengthened.

In addition, operational efficiency in the context of Functional Airspace Blocks should be maximised. In many situations, such as strikes, conflicts in neighbouring areas, adverse weather conditions or natural disasters, there may suddenly be an increased need for air traffic control. This often results in air traffic controllers within a Functional Airspace Block 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**
Deadlines for structural changes such as the realignment of national supervisory authorities (NSAs), unbundling and the establishment of network management (NM setup) must become more ambitious.
- **The European Union Aviation Safety Agency (EASA) should be given the capacity to act as the performance review body of the Single European Sky**
The implementation of the Single European Sky will inevitably strengthen EASA's role as a certification authority for both airborne and ground equipment and ensure that both are carried out consistently. Since digitalisation and data exchange between ground and airborne systems are becoming increasingly common, it makes sense from a safety perspective for EASA to carry out the review of both system sets.
- **We strictly reject measures that distort competition, such as bans on short-haul flights or the introduction of a kerosene tax (tax exemption is not equivalent to a subsidy)**
Maintaining short-haul flights is essential in many cases, as these flights often serve regions or cities that are more difficult to reach by other modes of transport. A ban could therefore have serious negative economic effects on these regions, particularly on tourism and the local economy.

The exemption from kerosene tax 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 kerosene tax could have a negative impact on the economy, as it would potentially affect tourism, trade and the mobility of people and goods. In addition, uniform global implementation of a kerosene tax is not realistically feasible and would therefore only lead airlines to switch to airports in countries with lower taxes, which in turn could result in traffic diversion and distortion of competition.

16. Border traffic: free movement for EU licence plates

I. General remarks:

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

The recent increase in customs controls at borders, in particular the measures carried out by Bulgaria against vehicles with links to Austria, has caused considerable delays and disruptions in freight transport. At times, dozens of Austrian hauliers were stuck at the Bulgarian border for several days. Such unnecessary obstacles to the free movement of goods must be avoided.

II. Specific proposals:

- **Free movement, 24/7, 365 days a year**
The objective must be to ensure unrestricted free movement of road freight vehicles with EU licence plates within EU borders, around the clock, 365 days a year.
- **Influence Member States to end excessive border control practices**
Until the Union-wide reduction of border controls for EU licence plates in road freight transport is achieved, the Commission should exert influence on Member States to ensure that their border control practices are carried out efficiently and in a targeted manner, without unnecessarily obstructing the free movement of goods.

17. EU-wide standardisation of factory-applied stickers for identifying emission classes in low-emission zones

I. General remarks:

To improve air quality, several federal provinces have introduced driving bans due to particulate matter for lorries and articulated vehicles of various emission classes, mostly Euro 2 and below, in some cases regardless of weight. All vehicle classes covered by the provincial rules, in particular heavy goods vehicles, which are not affected by a driving ban because of their emission classification, must display a corresponding emission-class identification sticker.

At present, there are no equivalent emission-class markings from other Member States of the European Economic Area that are defined by law or by public authorities and from which the necessary information is apparent, meaning that they cannot be recognised as equivalent in Austria. In practice, this creates a considerable burden for businesses, especially where, for example, a windscreen has to be replaced.

Possibilities for agreements on mutual recognition of such markings are being discussed on an ongoing basis with Member States of the European Economic Area.

II. Specific proposal:

The transport industry calls for EU-wide standardisation of factory-applied stickers for identifying emission classes for low-emission zones. Uniform standards create equal framework conditions for all market participants. They ensure fairness in competition and a level playing field and are therefore a foundation of the market economy.

18. No multiple penalties

I. General remarks:

In the transport sector, new and stricter legal requirements are continuously being introduced. The possibility for Member States to provide for different rules leads to a multitude of provisions, making it difficult for those subject to the rules to maintain an up-to-date overview of the applicable requirements and to act in compliance with the law. This often results in disproportionately high penalties imposed both on drivers and on companies.

One example is a situation in which a lorry driver receives a fine because the load was insufficiently secured. At the same time, the company to which the driver belongs may receive an additional penalty, on top of the driver's fine, for breaching operational rules or failing to comply with transport regulations. Similar situations can also arise in the case of infringements 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 may lead to financial burdens that can negatively affect business operations.

In practice, the accumulation principle, according to which several penalties must be imposed side by side if a person has committed several administrative offences through one act, also leads to unfair multiple penalties. In one specific case, a driver was accused three times of inadequate load securing: first, because the existing lashing straps had allegedly been damaged by the load; second, because too few lashing straps had been used; and third, because lashing hooks had not been attached to the lashing points¹.

The problem of multiple penalties exists primarily 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, including Belgium, Czechia, Denmark and Sweden². We therefore consider it desirable for this issue to be discussed at European level and for cross-border solutions to be identified.

We therefore propose the following:

II. Specific proposals:

- **Harmonisation of penalty practices across Europe**
Clear guidelines and standards laid down by the European Union for determining penalties in road transport should be adopted to ensure uniform and fair treatment within the EU and to promote the harmonisation of penalty practices. These standards must be clearly defined so that Member States have no room for divergent implementation; such leeway should in any case be removed or avoided when existing rules are amended and when new regulatory content is introduced. Since implementation in Austria is often very strict or excessive, this leads to unequal competitive conditions for our transport companies. Harmonisation could also be achieved through the exchange of best practices and the development of common guidelines.

¹ <https://www.dertransporteur.at/news/doppelt-und-dreifach-bestaft/>

² <https://uicr.org/wp-content/uploads/2018/01/IRU-ENFORCEMENT-HANDBOOK.pdf>

- **Move away from rigid punishment and make greater use of warnings**
Rigid penalties for minor offences and smaller infringements should be reduced across the EU and replaced in administrative penalty practice by the increased use of warnings. This would allow more flexible handling of traffic infringements while preserving proportionality between the seriousness of the infringement and the penalty imposed.
- **EU-wide abolition of multiple penalties for matters over which companies have no direct influence**
Multiple penalties imposed on drivers and companies for offences committed by drivers, over which the entrepreneur had no direct influence at the time of the offence, should be abolished across the EU. This rule aims to relieve companies of responsibility for matters outside their sphere of influence and to ensure that drivers are held individually accountable for their actions without the company being additionally penalised.

19. Uniform application of social legislation on tachographs in road transport

Legal act / status of legislative procedure: 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 stronger harmonisation of social legislation. In order to ensure legal certainty and equal competitive conditions within the EU, social legislation must be applied uniformly in all Member States. We therefore propose that national exemptions should be permitted only in special exceptional cases.

II. Specific proposal:

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

Penalties for infringements of obligations relating to recording equipment are regulated by the Member States. This leads not only to penalties of different amounts, but also – depending on differing administrative practices in the Member States – to arbitrary and disproportionate fines for minimal infringements, for example minor violations. Essential provisions should therefore be incorporated directly into EU law.

I. General remarks on the digitalisation of vehicle-related documents:

Carrying many required documents is a considerable burden for drivers. They must keep a large number of physical documents readily available at all times, which is very time-consuming and may result in high penalties if not complied with. Digitalising all these documents would reduce the burden on drivers and increase efficiency by simplifying access to all required information. Greater digitalisation could also significantly speed up procedures for control authorities.

The current division of digital European documents across different databases, such as the risk-rating system, TachoNet, the registration database and the EU Community licence, creates considerable additional effort. It reflects differing responsibilities and impairs efficiency and transparency in the field of vehicle documentation. Harmonising and digitalising these databases is therefore not only desirable but urgently necessary in order to simplify administration and optimise transport operations.

We support the efforts of European associations such as the IRU, ECR (Euro Control Route) and ROADPOL (European Roads Policing Network) to organise pilot projects involving digital documents and their control mechanisms. In the first phase, particular focus is placed on the common roadside control form. We see the updating and digitalisation of this document, as well as its availability in all EU languages, as a very important step.

II. Specific proposals on the digitalisation of vehicle-related documents:

- **European “one-stop digital shop” for vehicle-related documents**

We recommend creating a European “one-stop digital shop” in which vehicle-related documents can be stored and retrieved centrally. To support companies, all these databases should be merged into a single database. In addition, a reminder function for renewing certain documents within this database would be helpful. For enforcement authorities, it would be more efficient, and faster for companies, to scan a QR code on the vehicle instead of requiring drivers to search for paper documents, such as the tail-lift logbook. Since the relevant documents would be available online, penalties for drivers and companies could be avoided if drivers, for whatever reason, do not have them physically available.

In principle, we support the same documents being required at European level. However, the database should also make it possible to see whether different document requirements exist in individual Member States and to upload these as well. This would enable drivers and companies to clearly understand which documents are required depending on the countries they pass through. In addition, all necessary measures must be taken to prevent technical problems when documents are retrieved, for example during an inspection.

The following documents should be digitally available to drivers in the European “one-stop digital shop” when carrying out transport operations within the internal market (EU and EEA):

For the vehicle	• Registration certificate • Duplicate licence plate for trailers registered abroad
Optional for the vehicle	• Low-noise certificate • Documents for cabotage • Original rental agreement, in the case of a rented vehicle
For drivers	• Digital driving licence, passport or identity card, or a copy thereof • Records to be carried by the driver in accordance with Article 36 of Regulation (EU) 165/2014, in particular all handwritten records and printouts created on the current day and during the previous 28 (56) days as required under Regulations (EC) 561/2006 and (EU) 165/2014 • Documents to be carried by the driver in accordance with Article 1(11)(b) of Directive (EU) 2020/1057 for the purpose of checking a posting • Confirmation of employment, for example when a driver is driving a rented vehicle
Optional for drivers	• Confirmation of authorisation to drive the vehicle • EU driver attestation, for drivers from neither the EU nor the EEA • Visa, if applicable, and dangerous goods (driving licence) certificate, in the case of dangerous goods transport • EU Attestation of Activities • Driver qualification card for professional drivers, for drivers whose driving licence does not indicate Code 95

- **EU-wide abolition of the EU journey form**

Digital versions of the EU journey form already exist in many countries. We welcome the fact that the digitalisation of the journey form across the entire Union is now on the agenda, since manually keeping the EU journey form entails the risk of incorrect entries that may lead to penalties.

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

- **Dangerous goods examinations and recurring inspections**

We recommend digitalising dangerous goods examinations and other recurring inspections in the transport sector. Such an examination format would reduce administrative effort and costs for driving schools and companies, improve compliance with regulations and ensure a standardised quality level.

- **Ensuring data protection and data security**

It is particularly important to us that data protection, data security and transparency, especially regarding which data are checked, are guaranteed. In view of current

discussions about initiatives such as the establishment of automatic control systems along the EU's main transport routes to verify compliance with weight and dimension 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 in the current documents and as is necessary for control purposes.

III. General remarks on the Digital Networks Act:

The European Commission has proposed a regulation on digital networks (Digital Networks Act, procedure number 2026/0013(COD)) in order to modernise, simplify and harmonise EU rules on connectivity networks and to create the conditions for network operators to invest in the expansion of advanced fibre-optic and mobile networks. In order to maintain the resilience and operational safety of railway operations, we call for exclusive rights of use for radio frequencies for railway operations to be retained.

IV. Specific proposals on the Digital Networks Act:

- **Retain exclusive rights of use**

Exclusive rights of use for radio frequencies are required for railway operations in order to protect public safety and essential services. Article 15 provides for the principle of shared use of radio frequencies; however, Article 15(1) expressly provides for exemptions where shared use is not possible or not appropriate for certain reasons. Shared use of radio frequencies would be problematic, since even short-term disruptions or capacity bottlenecks can have significant effects on operational safety. This exemption must therefore be maintained in the further legislative procedure.

- **Restriction of the right of access to physical infrastructure**

Article 34(4) provides for a broadly formulated right of access to physical infrastructure controlled by public bodies, including stops and underground stations. The scope of this rule is problematic if it is applied to safety- and operations-relevant public transport infrastructure without explicit exemption provisions.

21. Passenger Package

Legal act / status of legislative procedure: Proposal for a regulation on the issuing of railway tickets; procedure number 2026/0115(COD). Proposal for a regulation on multimodal booking and repealing Regulation (EC) No 80/2009; procedure number 2026/0113(COD). Proposal for a regulation amending Regulation (EU) 2021/782 as regards the protection of passengers with single tickets; procedure number 2026/0114(COD).

I. General remarks on the Passenger Package:

In May 2026, the European Commission presented the “Passenger Package”, consisting of three separate legislative proposals, which aims to simplify the planning and booking of regional, long-distance and cross-border journeys.

From the perspective of the transport industry, it is particularly important to ensure clear exemptions for urban, suburban and local public transport, practicable and proportionate liability rules, and clear definitions for MDMS services and commercial agreements. Realistic technical and economic implementation deadlines are also needed.

II. Specific proposals on the Passenger Package - Proposal for a regulation on the issuing of railway tickets:

- **Targeted amendment of rail passenger rights**
Rail passenger rights must continue to clearly distinguish between regional and long-distance transport on the one hand and urban and suburban transport on the other. These public transport services operate without seat reservations and passengers usually have several travel options.
- **Exclude urban and suburban transport**
It is crucial that urban and suburban transport does not fall within the scope of the relevant requirements. In Austria, the legislator makes use of the possibility to exempt suburban railways from the rules on through-tickets (Article 12). This possibility must be retained in the further course of the legislative process.

The reason for this is, in particular, the allocation of liability in the event of missed connections, which would be disproportionate in terms of both journey time and ticket price. The railway undertaking whose service was delayed or cancelled and thereby caused a missed connection is liable for reimbursement, re-routing and compensation. If an urban or suburban route formed the first part of a travel chain under a “single ticket”, delays in local transport could give rise to direct compensation claims by long-distance passengers.

III. Specific proposals on the Passenger Package - Proposal for a regulation on multimodal booking):

- **Maintain exemptions for public transport**
We welcome that the proposed regulation provides for partial exemptions relevant to integrated transport networks with regard to local public transport. Specifically,

B2C Multimodal Digital Mobility Services platforms (B2C MDMS) for transport services that primarily serve an urban area or conurbation do not fall within the scope.

However, this urban exemption does not apply to providers of B2B MDMS services. This is problematic because of the unclear definition of B2B MDMS services, as depending on interpretation, cooperation arrangements in public transport could also fall within this category. Possible borderline cases include congress tickets, job tickets or distribution partnerships. Clarification is required here.

This exemption also does not apply to transport operators if they have a “commercial agreement” with MDMS service providers covered by the regulation. Here too, terminological clarification is needed, since the term “commercial agreement” is not defined in more detail in the regulation. In particular, it should be clarified to what extent cooperation within a transport association also falls under this term.

- In order to avoid ambiguities and take account of the specific characteristics of transport undertakings operating primarily in urban and metropolitan areas, it would be appropriate to transfer the exemption in Article 2(1)(a) to Article 2(3). At the very least, the existing wording for B2C should be repeated in the paragraph on B2B in order to avoid unintended effects on local public transport.
- V. Specific proposals on the Passenger Package - Proposal for a regulation amending Regulation (EU) 2021/782 as regards the protection of passengers with single tickets):**

- **Exemption of metro and tram from the scope**
We welcome the fact that the Commission recognises the specific situation of local public transport by fully excluding metro and tram from the scope of the proposed regulation and by providing for a partial exemption for urban and suburban rail transport. However, the latter applies only to self-contained networks used exclusively for the operation of urban or suburban rail services and is therefore too narrowly defined. It must be clearly regulated in the further legislative procedure that the exemption also applies where suburban rail services are predominantly operated on dedicated networks.

The decisive criterion should not be the formal and technical complete separation of the network, but the main purpose of the respective transport services. The relevant definitions and exemptions should be explicitly aligned with Directive 2012/34/EU so that no new or divergent terms for urban, suburban and regional transport and no additional or narrower exemptions are created. In particular, it should be clarified that hybrid network structures do not preclude the application of the exemption.

- **Review of existing tariff structures (PSO contracts)**
In addition, the Rail Ticketing Regulation explicitly covers competent authorities for public service obligations (PSO contracts), not only railway undertakings. Integrated public transport tickets are exempt only if a separate rail product for the same route can be purchased separately. If a journey can only be purchased as part of an integrated urban tariff, this could fall under the obligation and require technical

integration with third-party providers. A detailed review of existing tariff structures is required here.

- **Appropriate transition periods for smaller undertakings**

FRAND conditions (*fair, reasonable and non-discriminatory*) require the provision of reservations, yield-based fares and real-time data. In addition, there are technical requirements such as compliance with the technical specifications for interoperability relating to telematics applications (TSI-TAF/TAP standards), cybersecurity measures, proof of financial stability and the assumption of one-off connection costs. Appropriate transition periods and cost compensation should be provided for smaller operators in order to cushion the technical and financial burden of implementing the FRAND requirements.

Driving Time and Rest Periods

22. Revision of driving times and rest periods for coach tourism (occasional passenger transport)

Legal act / status of legislative procedure: Regulation (EU) 2024/1258 of 24 April 2024 amending Regulation (EC) No 561/2006 as regards minimum requirements on minimum breaks and daily and weekly rest periods in the occasional passenger transport 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 rules in mixed transport operations

There are bus companies whose drivers work within one shift in both occasional and regular services, so-called “mixed transport operations”. Typical examples of mixed services include rail replacement services in the event of unexpected disruptions. In such cases, drivers from regular services take over occasional services during the same shift. Other examples include excursions with schoolchildren, the transport of employees to their workplaces, ski buses, excursion trips and others.

Different national and European rules create contradictory requirements or lead to a regulatory gap in the area of occasional services. In practice, this situation creates legal uncertainty for the persons involved, employers, bus drivers and the competent enforcement authorities. During random roadside checks, for example, the police are uncertain which rules should be applied when checking bus drivers working a shift with “mixed services”.

II. Specific proposals:

- **We welcome the fact that the “12-day rule” has also been permitted domestically**
The 12-day rule, which was previously permitted only for cross-border journeys, has also been permitted domestically. Unfortunately, however, changes to its application are not being discussed, namely the 45-hour rest period before and the 69/90-hour rest period afterwards. It also remains permitted only with a single travel group; a combination of different journeys is not on the table. Unfortunately, neither the European Commission nor the European Parliament has taken up the industry’s proposals to make compensation for rest periods more flexible, for example up to three weeks afterwards.

23. Tolerances in driving time and rest periods in goods transport and special rules

Legal act / status of legislative procedure: Regulation (EC) No 561/2006 on the harmonisation of certain social legislation relating to road transport.

I. General remarks:

At present, in exceptional situations, it is possible to deviate from the regular driving and rest time rules in order to ensure the safety of people, the vehicle or its load.

With regard to 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 practical work requirements on construction sites.

Battery-electric vehicles also present challenges because charging takes longer than refuelling with conventional fuels. It is therefore necessary to adapt the rules on driving and rest times to the electrification of road transport and to integrate the charging process for battery-electric vehicles into driving operations in the best possible way.

II. Specific proposals:

- We therefore propose creating an exemption option for construction-site transport, as already exists under Article 13 of Regulation 561/2006 for other situations. In order to enable drivers to respond appropriately when unforeseen events occur, we propose introducing tolerances for driving and rest times in special circumstances such as congestion or diversions – not only in guidelines.
- We propose adapting driving and rest times in order to allow vehicle movements connected with the charging process of battery-electric vehicles during breaks and rest periods.

24. Five-star parking areas instead of a ban on taking the regular weekly rest period in the cabin

Legal act / status of legislative procedure: Regulation (EU) 2020/1054 of 15 July 2020 amending Regulation 561/2006.

I. General remarks:

Regular weekly rest periods and compensation rest periods for reduced rest periods may currently not be spent in the vehicle. In practice, this rule often creates difficulties, as suitable alternatives to resting in the cabin are not available to a sufficient extent. Drivers are therefore often faced with the situation of having to cover additional distances at the end of their working day in order to reach adequate accommodation for the required rest periods.

II. Specific proposals:

- With regard to the Commission's plans to establish secure parking areas every 150 km along the TEN-T core road network, we propose abolishing the obligation not to spend the weekly rest period in the cabin and instead investing in the creation of additional secure parking facilities.
- When creating adequate parking areas, the concept of five-star parking facilities should be taken into account. These should meet the following criteria: safety, cleanliness, warmth, social facilities and affordability. By creating such modern parking areas of the future – such as the one currently being built on the A8 Innkreis motorway³ – which are specifically tailored to the needs of lorry drivers, a safe and modern environment for their rest periods can be ensured.

³ https://www.ots.at/presseaussendung/OTS_20230505_OTS0041/asfinag-baustart-fuer-truck-stop-hausruck-an-der-a-8-innkreisautobahn

Reducing administrative burden

25. Reducing administrative burden and streamlining reporting requirements in transport

Legal act / status of legislative procedure: Professional Driver Directive (2022/2561); Implementing Regulation (2023/1693) on the interoperability of the “traffic operation and traffic management” subsystem of the railway system; Delegated Regulation (2017/1926) on the provision of EU-wide multimodal travel information services.

I. General remarks:

Against the backdrop of geopolitical changes, the European Commission has, in our view, made an urgently needed shift towards greater competitiveness and regulatory simplification. With the omnibus legislative packages to simplify sustainability legislation (CSRD, CSDDD, CBAM, taxonomy), the Commission has reaffirmed its simplification ambitions, aiming to reduce bureaucracy costs for companies in general by at least 25% and for SMEs by at least 35% by 2029, including in the area of sustainability legislation. We welcome this objective, but point out that the transport and mobility sector continues to face extensive bureaucratic burdens in other areas.

II. Specific proposals:

We propose the following measures to reduce administrative burden:

- **Improved training: combining the driving licence and initial qualification (Professional Driver Directive (Directive (EU) 2022/2561))**
Since the majority of lorry and bus drivers are required to meet initial qualification requirements, it makes sense to combine the initial qualification with training and testing for the driving licence. We propose explicitly creating the possibility in future to integrate driving licence training and initial qualification more closely.
- **Avoid repetition in continuing training by gradually reducing the duration of continuing training from the second training cycle onwards, as drivers have already gained more experience (Professional Driver Directive (Directive (EU) 2022/2561))**
With regard to the organisation of continuing training over the five-year period, drivers and companies should have the possibility to decide freely, according to their individual circumstances, how continuing training is distributed within the five-year period.

The mandatory completion of the same continuing training content every five years is often regarded as unnecessary. We therefore propose gradually reducing the duration of continuing training from the second training cycle onwards, as drivers have already gained more experience.
- **Interoperability of the “traffic operation and traffic management” subsystem of the railway system (Implementing Regulation (EU) 2023/1693)**
The rules and route book should contain only the absolutely necessary rules and information in order to limit the administrative burden on railway undertakings. We

reject the view that train drivers must know every single route and therefore have to drive it regularly for practice. It is entirely sufficient, and also common practice, for train drivers to be familiar with the system logic, including signals and similar elements. In this respect, clarification in the form of more specific EU requirements would be desirable.

- **EU-wide multimodal travel information services (proposal amending Delegated Regulation (EU) 2017/1926)**

The additional requirements for historical data (Article 3(1), Article 4(1) and (3), and Article 6(1)) should be reduced to the necessary minimum, since all data to be made available must be physically stored somewhere. This places a burden on storage capacity, which is generally provided by cloud providers. In order to reduce the burden on data and service providers as well as on the environment, we argue that “raw data” should not have to be provided in this area.

We do not see 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 were introduced hastily in response to the pandemic, while data protection aspects were pushed into the background.

26. Freedom of choice in rail transport under the PSO Regulation

Legal act / status of legislative procedure: 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, known as the PSO Regulation (Public Service Obligation Regulation), as amended by Regulation (EU) 2016/2338.

I. General remarks on PSO:

The PSO Regulation defines how 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 Article 1(1) of the PSO Regulation).

With regard to the type of award, the PSO Regulation clearly grants users of the law discretion at national level by generally providing for several award options, for example competitive tendering or various forms of direct award. In Austria, the federal government, the provinces and the transport associations primarily apply the rules on direct awards under the PSO Regulation, which subsequently also affects transport undertakings and their services. The deliberately created possibilities for direct awards are used successfully in numerous Member States. In the railway sector, it is striking that those countries that have chosen the path of direct award occupy a leading position in terms of punctuality, customer satisfaction and rail kilometres travelled per inhabitant.

In its guidelines, however, the European Commission calls for competitive procedures to be prioritised over direct awards of public service contracts for passenger rail transport. The Commission’s guidelines therefore contradict the PSO Regulation. This obvious discrepancy between the regulation and the interpretative guidelines has been assessed by independent experts, namely Attorney at law Dr. Walter Schwartz together Attorney at law Mag. Jacqueline Kachlyr-Poppe, and by European law experts University Professor Konrad Lachmayer together with University Professor 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 have no legally binding character; they merely reflect the legal view 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 for the Member States to define their own objectives for minimum requirements for services of general economic interest, for example environmental protection, mobility for persons with disabilities or consumer protection.
- The ex-ante needs assessment formulated by the European Commission cannot be derived from the PSO Regulation.
- The provision stating that Article 5(4a) of the PSO Regulation should be interpreted restrictively should not be followed.

The Council rejected the Commission proposal according to which passenger transport services should only be authorised if the award was both appropriate and proportionate. For reasons of democratic policy, the rule of law and the separation of powers, we reject the

attempt to enforce the 2013 legislative initiative on the PSO Regulation through these interpretative guidelines against the will of the actual legislative bodies.

II. Specific proposal on PSO:

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

One advantage of direct awards is that they help create new and denser train connections quickly. Tenders, by contrast, take a long time and delay the urgently needed mobility transition. Experience with liberalised railways in other countries shows overall economic and ecological downward trends. Tendering does not make railways more efficient; rather, it increases the risk of poorer services and higher ticket prices for passengers.

27. Revision of the EU public procurement directives

Legal act / status of legislative procedure: Directive (EU) 2014/24 on public procurement and Directive (EU) 2014/25 on procurement by entities operating in the water, energy, transport and postal services sectors.

I. General remarks:

The European Commission is currently evaluating Directives 2014/24/EU and 2014/25/EU as well as the Concessions Directive 2014/23/EU; the public consultation was completed in March 2025, the revision of the 2014 procurement directives is ongoing, and a new legal framework has been announced for the second quarter of 2026 according to the Commission work programme. From the perspective of the transport industry, the ongoing revision of the EU public procurement directives is an important opportunity to make public procurement more practical and more strongly geared towards security of supply and strategic resilience. In doing so, attention must be paid to achieving a balance between European preference (“Made in Europe” criteria) and flexibility in procurement, as well as to harmonising the multitude of existing requirements.

II. Specific proposals:

- **Continuation of in-house awards in their current form**
In-house awards are an indispensable instrument for ensuring services of general interest and enable efficient service provision with long-term investments. In-house contracts are subject to strict requirements regarding market conformity and price appropriateness, as well as to review by courts of audit and internal audit bodies.
- **Necessary balance between European preference (“Made in Europe” criteria) and flexibility in procurement**
The general preference for European products and services is welcome. In detail, however, it must be ensured that “Made in Europe” criteria are designed in such a way that a sufficient number of bidders remains available in the energy and mobility sector and that tenders remain practicable. If European products are to be preferred, a clear and simple rule is also needed, together with an uncomplicated way to clearly identify “Made in Europe” products.
- **Harmonisation of the multitude of existing requirements**
The public procurement legal framework has become increasingly unclear. In addition to the procurement directives, numerous sector-specific regulations, for example the Net Zero Industry Act, affect procurement law. This fragmentation makes it more difficult to apply the law. Procurement-law requirements (“how to buy”) should in future be regulated exclusively in the procurement directives in order to guarantee clarity for contracting authorities and bidders. Further requirements concerning the product itself can continue to be dealt with in separate legal acts. Integrating all “what to buy” requirements into the procurement directive would expand the legal act disproportionately.

- **No exclusion of bidders on purely formal grounds**
Often, only a limited number of interested companies is available. Exclusion due to minor formal shortcomings, for example in suitability documents, exacerbates this problem. Reducing documentation requirements and allowing greater scope when examining tenders would promote competition. Formal deficiencies should be easier to correct, and necessary subcontractors should be capable of being nominated subsequently.
- **Greater flexibility in taking additional requirements into account**
The integration of environmental, social and innovative criteria is welcome in principle, but must not result in overregulation. In sectors with already few providers, contracting authorities are in practice sometimes already tied to individual manufacturers. A flexible rule is therefore needed, allowing exceptions where the number of tenders is already limited.

28. Easing regional burdens - resident tariffs

Legal act / status of legislative procedure: 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 ensuring the smooth functioning of the internal market, are shared. In terms of its intention, the Geo-blocking Regulation is directed primarily against technical default settings that prevent customers from one Member State from accessing a website that the provider has primarily set up for customers from another state.

However, its application in areas outside electronic commerce should be called into question. Clearly defined guidelines are lacking for the admissibility of objectively justified differentiation, in particular for regional requirements and measures tailored to specific target and customer groups.

Especially in connection with regionally rooted services, for example in the tourism industry, the lack of differentiation regarding objective justifications and exemption provisions leads to considerable legal uncertainty in relation to the necessary consideration of regional requirements.

Particularly in structurally weak rural regions that are highly dependent on tourism, winter tourism in particular generates added value that enables prosperity and prevents outmigration. At the same time, the local population is often confronted with increased traffic burdens and higher prices in certain areas of everyday life. In order to enable balanced regional solutions, such as resident tariffs, legal certainty must be ensured.

II. Specific proposal:

- **Enabling resident tariffs**

In order to create a balanced and acceptable arrangement, the Geo-blocking Regulation should allow objective differentiation in the provision of tourism services, for example resident tariffs. The European Commission initiative launched in February 2025 to evaluate the effectiveness of the Geo-blocking Regulation offers an opportunity to address this.

Railways

29. Continuing the success model of night trains

I. General remarks:

In the European Climate Law, the European Union has set itself ambitious CO₂ reduction targets, particularly for the transport sector. Night trains make an important contribution to achieving these climate targets, as they offer an environmentally friendly option for long-distance transport and stand out due to their high energy efficiency and low land use.

In addition, night trains appeal to a broad target group and have long-term economic potential. At present, however, this potential can only be used to a limited extent. High operating costs, limited capacity utilisation, usually due to only one journey per day, and infrastructure bottlenecks across the EU make economically viable operation more difficult. Targeted measures and appropriate political and infrastructure-related framework conditions are therefore required to advance the expansion of sustainable night train connections.

II. Specific proposals:

- **Reducing track access charges for night trains and introducing a night segment**
Track access charges account for 10-20% of total costs in night train operations. A dedicated, lower-cost price segment for night trains, coordinated across the EU, would significantly improve economic viability. This could be implemented, as in the Belgian model, through full or partial reimbursement of track access charges and traction electricity costs. At the same time, infrastructure managers should be compensated for any loss of revenue. The new EU guidelines on track access charging provide an appropriate framework for such a rule.
- **PSO support**
New night train connections, especially cross-border ones, require high upfront investment and involve economic risks. Public service obligations (PSO), as provided for in Regulation (EC) No 1370/2007, enable public support for start-up and risk financing. This option has so far been used only to a limited extent. Targeted application would facilitate the establishment of new routes, particularly on connections with high ecological benefits but still uncertain market conditions.
- **Improving strategic and ad-hoc capacity planning and management to reduce delays and disruptions**
Delays in night train services often arise from construction works and low priority in the network, particularly during the morning peak period. Better strategic and operational capacity planning, for example through EU-wide early coordination of construction works 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 ongoing EU regulation on the use of railway infrastructure capacity (COM 2023/0271) should explicitly take night trains into account in this regard.

30. Promoting innovation in rail freight transport

Legal act / status of legislative procedure: Applicable Technical Specifications for Interoperability (TSI); amendment proposal 2023/1695/EU of 10 August 2023.

I. General remarks:

The EU-wide harmonised introduction and promotion, or safeguarding of financing, of the European Train Control System (ETCS) is welcomed in principle because it increases the performance of rail infrastructure. However, it should be noted that existing vehicles equipped with conventional train protection systems can no longer operate, and that retrofitting to ETCS is not yet offered across the board by the rail industry and is very cost-intensive at around EUR 800,000 per vehicle.

The EU-wide introduction of digital automatic coupling is also assessed positively in principle. However, existing rolling stock and the financial resources available to companies must be taken into account.

II. Specific proposals:

- **Digital automatic coupling (DAC)**
We call for company-compatible framework conditions in connection with the EU-wide introduction of digital automatic coupling and for securing the financing of DAC.
- **EU-wide harmonised ETCS train control system**
Running on lines equipped with ETCS, without conventional train protection systems, is possible only if the locomotives are also fitted with the very expensive ETCS train control system. Locomotives equipped with a conventional train protection system and not ETCS-compatible cannot use this “ETCS infrastructure”. It must therefore be ensured that the exclusive use of ETCS in the Member States is introduced only in a harmonised manner, so as to allow operation with a sufficient number of available locomotives. Until then, parallel-installed train protection systems such as PZB 90 should remain switched on alongside ETCS in order to allow continued operation. Otherwise, a decline in rail freight transport is to be feared due to the high acquisition costs and lack of vehicle availability.
- **Funding for the transition to ETCS**
Funding should be provided to enable accelerated ETCS retrofitting of existing vehicles.

