Subject: MVC IWG - Notes of Skype meeting #1 - 2019-12-06

Discussions / decisions

As mentioned in MVC IWG - Skype meeting # 1 - 2019-12-06. During discussion and Decisions, the Norwegian Public Roads Administration wants to publish an inquiry about cross border travels problems that arise when the Norwegian transport company use of MVC combinations meets technical and administrative obstacles to the conveyance of goods across national borders in Europe. As long the combinations are within international regulations in terms of length, width and height. It should not, then it be a case that national adaptations impose barriers to carriers operating through multiple cross border travels.

Here, is comments were received from the transport company which experienced it as a frustrating development as the meaning of the Module combinations was that they should be adapted to main roads in Europe. In Norway with 25.25.M MVC covers about 20% of our total roads in Norway. All roads are linked to border crossing and to major places near our largest cities.

See text on received email:

As informed today by email, I hereby send you some of our experiences and challenges concerning using vehicles of 25,25 m in international trafic.

You are free to pass this e-mail to who is may concern. That's the reason it's written in english. The following is base on our information and experience, and may have some smaller deviation

The following is also base don the tekst futher down, that is send to the Transport comitee of the Norwegian government

Our and customers experience is that there is a lot of different rules in different counties, and standard vehicles is denied using in in different countries. Germany and Holland makes it difficult. In this case it is flower transport from Holland to Norway.

It's wery difficult navigating in this different regulation. I have been in contact with a lot of German official offices, with the result that you are advised to another office, again and again.

<u>Vehicles</u>:

As you can se in the attachment, there are different rules in different countries. The attachment show the turning circles (for tractor & trailer & central axled drawbar trailer) and weight. Asume that also is actual for truck + dolly + trailer.

But there is more:

- Germany:

- The complete combination has to be brought to Dekra Germany for physically approval
- Special approval of separat vehicles in 25,25 combination
- o Special equipment; backward camera, EBS, lane warner etc.
- Turning circle demands steerable dolly/truck «short» wheelbase and towcoupling at rear and trailer with steering (see attachment). This vehicle will overload driving axle at tot weight 60 T
- Holland
 - The vehicle has to be brought to RDW, and controlled to the minor detail
 - Special vehicle demands on top of COC approved equipment, f.ex.: Additional sideguards (extra 50 mm to cover dieseltank trailer), markerplates (not only long vehicle at rear) and weight indicators each axle (tollerance of +/-30 kg),
 - O This prossess has a waitingtime of approx 2 month.
 - No allowence with dolly with steering.
- Sweden
 - No allowence with dolly with steering.

Driver:

- Germany
 - Min 5. years drives licence and 2 years' experience
 - o The driver has to take a driver's test at Dekra, and be approved
- Holland
 - The driver has to take a Dutch driver licence. Duration 3 day and cost of approx. €
 1700-2000 + drivers salary. Waiting time for drivers licence is approx. 3 mnd. This
 drives will then be attractive at job marked, and easily swap job. The company will
 then have to constantly send drivers to Holland and driving lessions

I have been told that representives from Dekra and RDW have tryed to find a common solution, without any luck. The result is that it has been developed very different regulations.. This looks like protectionism, and is at may not be the purpose of international commercial traffic.

We are looking forward to your response concerning this:

- Is this differences the purpose?
 - Shall Norway demand norwegian driverslicence and 3 axled tractors cause winterconditions?
- Will this regulations be hamonizided, and when?
- It this a case that has to be liftet to a governmential level?

quote end.

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