



Romanian Parliament  
Senate

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Bucharest, September, 26, 2017

**OPINION**

***Regarding the Proposal for a Directive of the European Parliament and of the Council amending Directive 2006/1/EC on the use of vehicles hired without drivers for the carriage of goods by road***

***COM (2017) 282 final***

**The Romanian Senate** examined the **Proposal for a Directive of the European Parliament and of the Council amending Directive 2006/1/EC on the use of vehicles hired without drivers for the carriage of goods by road – COM (2017) 282 final** – according to the provisions of the Treaty of Lisbon (Protocol no. 2).

Taking into account the report of 468/ September, 20, 2017 of our permanent Committee on European Affairs, **the Plenum of the Senate**, during its session of September, 25, 2017, decided as follows:

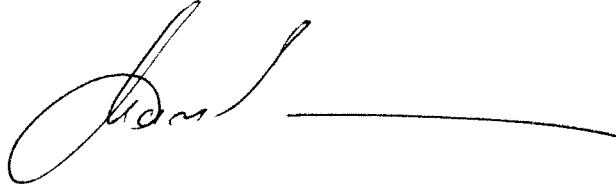
- 1. This Regulation does not violates principles of subsidiarity and proportionality.**
- 2. Within the amending Directive 2006/1/EC on the use of vehicles hired without drivers for the carriage of goods by road, the following are recommended to pursue:**
  - a) Clarifying the proposal changes as interpreting them as a possible alignment of the possibility for a transport operator to use rental vehicles, under the same conditions as vehicles owned in the ownership;
  - b) Clarifying the possibility for a national transport operator to use rented vehicles registered in other Member States for national and international road transport;
  - c) Clarification and, if it is necessary, reformulation of provisions that could create significant difficulties for control authorities. The main obstacles raised in the new provisions application are:
    - difficulties in the process of correctly identifying the vehicle and its holder, establishing the existence or absence of effective registration of such vehicles, verifying compliance with technical and admissibility conditions in international traffic, and sanctioning road traffic violations at national level and the implementation of Directive 2015/413/EU, taking into account the different types of registrations existing at Member State level (seasonal, temporary, etc.), the doubtful

quality of documents submitted to control, the impossibility of resorting to the bases data and cooperation networks established at EU level (EUCARIS/ PRADO) in order to be able to identify the approved specimens of the temporary and seasonal certificates issued by the Member States for registration and registration plates;

- identifying the concrete ways to effectively verify the operators compliance with the four-month period in a calendar year;

- d) Increasing the efficiency of the European Register of Road Transport Undertakings (ERRU) which currently does not work at optimal parameters (a number of Member States are not even interconnected at ERRU);
- e) Consider carefully the advantages and disadvantages of renting vehicles in any Member State and their use in the other Member States, which could encourage leased carriers to keep costs as low as possible by renting at least some vehicles with very high in-use traffic, which would have negative effects to what the proposal indicates in the impact assessment (possible positive impact of the new regulations on road safety and the environment).

**p. Speaker of the Senate**

A handwritten signature in black ink, appearing to read 'Iulian - Claudiu MANDA', followed by a long horizontal line extending to the right.

**Iulian – Claudiu MANDA**