



Position Paper

To: EU Commission

From: ESTA Board of Directors

Date: Monday, February 7, 2022

Subject: Feedback to information request regarding SSTPA
Safe and Secure Truck Parking Area's

In response to your feedback request ESTA has formulated her position with regard to the establishment of Safe and Secure Truck Parking Area's (SSTPA) in this position paper.

The European Association of Abnormal Road Transport and Mobile Cranes (ESTA) is the unique European arm for national trade Associations, representing mobile crane rental- and abnormal road transport companies.

Presently, ESTA represents 22 national associations from 15 European countries and has 38 affiliated members representing the other stakeholders in our industry, such as equipment manufacturers, safety officials and national regulating authorities.

The importance of the sector we represent should not be under estimated even though the volume of vehicle movements in abnormal transport is a mere 2.5 % of all goods transport movements. Without abnormal transport no wind park, industrial installation, power station or infrastructure could be built and no construction machinery would arrive at any building site.

Due to the nature of the transports executed and the vehicles used, the abnormal transport activity is subject to an array of national regimes of transport permits which often include compulsory driving time restrictions, that lead to extended waiting time. In combination with the usual regime of driving and rest time rules that also apply, the drivers of abnormal transports are even more dependent on finding a suitable parking area at the right time than the drivers of 'normal' trucks.

With this in mind it is clear ESTA fully supports the initiative by the commission to introduce standards and a certification for Safe and Secure Parking Areas in follow up of the study finalised in 2019. However we have a number of reservations when it comes to the details of the standard and the accompanying subsidy process.

First of all we regret to notice that both in the study as well as in the proposed supplementing regulations there has been no consideration at all for abnormal transport as such.

In all documents related to SSTPA's the word 'abnormal' or 'exceptional' transport does not even appear, which we find a missed opportunity.

As we have stipulated before, the possibilities to use a safe parking area are of great importance to vehicles executing abnormal transport.

Hence we would urge you to make the following design features part of the standards detailing the level of service and security of EU safe and secure parking area's :

- ✓ Size and layout of parking entrances designed to accommodate over-width and over-height vehicles. Minimum sizes: width 8 m. and height 6 m.
- ✓ Parking area's should each have at least three designated abnormal transport parking bays that can accommodate vehicle combinations that are 7 m. wide and up to 50 m. in length.
- ✓ Parking lay out and lane size to an abnormal transport parking bay should also accommodate these transport widths and heights and bends and curves should be avoided as much as possible or designed to accommodate the covered track of these vehicle combinations.

ESTA would welcome a Commission decision as a result of which this initiative could be connected to the CEDR / PIARC initiative for the development of Intelligent Access policies.

If so, parking operators that connect to the Intelligent Access system should receive a higher rating. The future use of Intelligent Access in connection with a reservation system for parking bays will raise the utilisation of the parking and remove the present uncertainty of finding a suitable parking place, which is presently often the case for normal truck drivers, but unfortunately an everyday nuisance for abnormal transport drivers. You should also realise that unlike normal trucks, the abnormal transports cannot be placed at the side of the road without endangering other traffic.

We trust our comments will give you clearer picture of the typical hinderances the Abnormal transport companies meets when using present parking facilities and we trust our comments will prompt you to consider our proposals for improvement in the interest of road safety and transport efficiency.