



# Position Paper

To: Associazione Nazionale Noleggi Autogru, P.L.E  
e Trasporti Eccezionali

From: ESTA Board of Directors

Date: August 10<sup>th</sup>, 2022

Subject: ESTA position on issues in permitting Abnormal Transports in Italy

Dear Mrs. Dal Col, dear Mr. Massetti,

In response to your feedback request ESTA has formulated her position with regard to the present permitting situation for abnormal road transport in Italy in this position paper.

Please feel free to share this document with the Italian authorities in as far as you think this is opportune – as a matter of information for the parties you share this with, we have included a brief introduction of ESTA.

ESTA is the the leading European association for the abnormal road transport and mobile crane rental industry. We represent national trade associations whose members are mobile crane and access platform, rental and abnormal road transport companies. ESTA presently represents some 120 associations and companies from 24 European countries. (please refer to [www.estaeurope.eu](http://www.estaeurope.eu) )The presidency of ESTA is presently in hands of Mr Fabio Belli from Fagioli SpA and the association ANNA ( [www.assoanna.it](http://www.assoanna.it) ) is our Italian member representing the Italian Crane rental and Abnormal transport industry.

We have come to understand that there presently are a number of problems hampering the issue of permits for the execution abnormal transports in Italy by the relevant authorities. Although not exhaustive, the most important of these issues are listed here below:

1. Permitting regulations for mobile cranes related to the weight of the machine;
2. Permitting regulations for mobile cranes related to the ownership of the machine
3. The number of authorities and agencies responsible for issuing permits for abnormal road transports
4. The repeated Bridge technical reviews needed for the application of permits over a certain Gross vehicle weight.

We will address these issues separately below.

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However, before we embark on this response, we would like to emphasize the background of our position.

ESTA has since her establishment in 1976 always supported the harmonization and homologation of permitting rules and regulations throughout Europe. The main goal for this strive has always been to improve efficiency and safety in our industry. We have learned from experience (not only in the EU, but also in the United States and Australia) that harmonization of rules and simplification of application procedures lead to more abnormal transport permits being applied for, thus reducing the number of illegal transports. With this in mind ESTA has already in 2008 given her input and support to the publication of the Best Practice Guide for Abnormal Transport published by Directorate-General for Energy and Transport, *Abnormal road transports : European best practice guidelines*, Publications Office, 2008. (Please see : <https://op.europa.eu/en/publication-detail/-/publication/fa2d050b-24d2-469c-af61-43838653f075> )

The production of this Best Practice Guide was supported by the Italian Ministero delle Infrastrutture e dei Trasporti under supervision of Mr Luca Rocco. (please see page 61). Unfortunately we have to conclude that none of the recommendations of the Best Practice Guide have to date been implemented in Italy.

1. Permitting regulations for mobile cranes related to the weight of the machine.

We have been informed there now is a cap of weight for mobile cranes in place in Italy, regardless of the axle loads or the number of axles of such a crane. The guide line for steel transportation (maximum weight 108 tons) seems to be misleading the application for mobile cranes permits. If this is the case, we would like to stress that although there is a logic to bring the movement of mobile crane vehicles under the rules for abnormal transports,(as it is in most EU countries) there is no technical ground for capping the maximum weight at 108 tons, provided the crane vehicle has a sufficient number of axles and the axle loads do not exceed 12 tons each.

In this topic, ESTA calls for the lifting of the maximized weight of 108 tons.

2. Permitting regulations for mobile cranes related to the ownership of the machine.

Apparently there is a regulation in place in Italy that only allows the owner of a mobile crane to apply for an abnormal transport permit for the crane. This practice is unique in Europe and ignores the prevailing practice of cranes being used by the actual user on the basis of a lease agreement with a financing company (who is the owner). This regulation leads to huge practical problems for crane companies and will encourage illegal driving without a transport permit out of sheer operational stress. ESTA sees no valid ground for this restriction of applicants, moreover since this is no other EU country that requires this prerequisite.

ESTA strongly urges you to eliminate this unnecessary application barrier.

3. The number of authorities and agencies responsible for issuing permits for abnormal road transports.

The present situation with regard to the number of regulators / road authorities / agencies assigned with the task of evaluating permit applications and issuing road transport permits in Italy appears to be over 225 entities at the moment. (about 100 provinces, 100 ANAS and around 25 technical offices of private highways) To ESTA it is obvious that this huge and quite unprecedented number of different authorities dealing with abnormal road transport permits leads to confusion and unnecessary bureaucracy as well as delays and unequal treatment of applicants in processing their applications. This slow and opaque processing of applications leads to unnecessary costs and delays in permitting, which in turn will entice transport companies to drive without a permit.

At this point ESTA would like to draw your attention again to the BPG for abnormal transport that clearly advocates the installment of a single point of entry per country for permit applications, in combination with internet based permitting procedures. The countries that have installed this system such as Sweden and the Netherlands, report an increase in permits issued against a reduction in issuing costs in combination with a reduction of 'illegal' transports (vehicles driving without a permit). Hence we strongly advocate the installment of a single point of entry for abnormal Road transport permit applications.

4. The repeated Bridge technical reviews needed for the application of permits over a certain Gross vehicle weight.

We have learned that the application for certain heavy transports in Italy ( in general, depending on the vehicle combination with a Gross Vehicle weight over 150 tons) requires a Bridge Technical Review for every bridge on the route that will be passed by the transport. We are not contesting the necessity of this rule, however we are contesting the repeated calculation of the same bridges being crossed by the same vehicle configurations simply because there is a new transport permit application. ESTA is of the opinion that common sense would dictate the same bridge being crossed by the same vehicle configuration could rely on an earlier assessment of the occurring loads for this situation, if available. If a transport operator is required to issue an order to an engineering company to repeat the same calculation for a reoccurring transport multiple times, this will only lead to unnecessary costs and will diminish the support for genuinely useful measures and regulations to protect infrastructure. Hence, ESTA calls upon the Italian authorities to review this procedure.

The above represents the position of the ESTA Board of Directors on a number of specific topics related to the issue of abnormal road transport permits in Italy, brought to us by our Italian member ANNA (Associazione Nazionale Noleggi Autogru, P.L.E. e Trasporti Eccezionali)

The above does in now way represent the full position and all improvement proposals ESTA has to offer to regulatory authorities on this subject.

## **ESTA Position paper**

That is why, in addition to our position on these specific points, we would also like to draw your attention to the upcoming revision of the directive on weights and sizes of road transport vehicles (Directive 96/53/EU) and as a result of this the announced revision of the existing Best Practice Guide for Abnormal Transport.

The ESTA Board would certainly welcome the chance to discuss this revision and the best practices in abnormal road transport permitting with the relevant Italian authorities, should we be given this opportunity.