



Examples of Single Market barriers for businesses

On 10 March 2020 the European Commission published its [report](#) “Identifying and addressing barriers to the Single Market”, as part of the spring Single Market package. BusinessEurope responded by its [position paper](#) of 10 June 2020, broadly supporting the analysis, however noting that the spring package is only a part of the answer and there is a need for additional concrete actions to remove barriers that harm the EU businesses and consumers.

To facilitate informed decision-making, tangible examples of the barriers businesses and citizens face in the Single Market are key to understand the remaining bottlenecks. BusinessEurope continues building up the evidence and has prepared a series of short papers showcasing practical issues on the ground, which come as package or can also be used individually in policy discussions with different interlocutors, as they illustrate barriers across a wide range of different policy areas: from free movement of goods and services to company law, social policy coordination or transport. The papers supplement the work done by the European Commission in analysing the “root causes” of barriers and are structured around two categories:

- barriers emerging under the existing EU legislation, due to its complexity, inconsistencies, uneven interpretation and application by Member States, etc.
- barriers emerging in the absence of EU legislation, where an additional harmonised framework might be necessary.

The examples linked to this introductory note are not an exhaustive list and would be supplemented by new cases in the future.

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Administrative requirements for short-term postings of workers and business trips

This paper concerns barriers to free movement of services and posting of workers due to national measures implemented by Member States.

CONTEXT

Companies are facing an increasing number of barriers when posting workers in the EU, due to accumulation of legislation at the European level, combined with different national implementation measures and a tightening of the rules. Some requirements and sanctions put in place by Member States are in violation of EU law, as they are disproportionate and/or discriminatory. This creates obstacles to workers travelling on simple business trips and to companies posting workers, in particular in case of short-term postings, as well as uncertainties for the workers themselves.

Whilst posted workers for example need to request an A1 form certifying which social security legislation applies to them, issued by their Member State of origin, A1 forms are not useful in case of business trips. Nevertheless, various EU countries require workers travelling abroad in the framework of business trips to be in possession of such a form, which is disproportionate and therefore creates barriers to the freedom of movement.

LEGAL FRAMEWORK

Directive 2014/67/EU on the Enforcement of the Posting of Workers Directive ('Enforcement Directive') came into force in June 2016. The revision of the Posting of Workers Directive 96/71 was adopted in July 2018. It will make the rules more complex and generate additional administrative burdens for companies. It had a transposition deadline of 31 July 2020 and all Member States had to transpose at the same time, to ensure a level playing field. However, a large number of Member States have not yet implemented it. This will add to the problems for companies. These two new directives are the EU's effort to strike a balance between the need to promote the freedom to provide services and the need to protect the rights of posted workers. Another key objective of both directives is to harmonise rules across the EU and foster genuine social convergence between Member States.

Considering the current economic crisis induced by Covid-19, BusinessEurope called on the Commission to initiate a fast procedure in order to postpone the date of application of Directive 2018/957, to the time when it could be effectively implemented by business and national administrations. Meanwhile, the existing rules on posting of workers (Directive 96/71/EC), with which all operators are already familiar, would have remained applicable. As required by Article 24 of the Enforcement Directive, the Commission



published a report reviewing this directive in September 2019 in which it stated that the directive was properly implemented in all Member States and consequently, it did not recommend any amendments.

Regulations 883/2004 and 987/2009 provide rules on coordination of social security systems and A1 forms. The regulations are currently under review as the Commission submitted a proposal to amend these regulations in 2016. The Council and the European Parliament have been negotiating since 2018 to finalise a compromise text.

EXAMPLE

A German company, specialised in precision tools, sends around one hundred employees in foreign assignments across Europe per week, and is therefore obliged to request one hundred different A1 forms from the German authorities weekly. The company's travel department has estimated that the cost of each A1 request is approximately fifty euros, which induces a cost of two hundred and fifty thousand euros annually. On top of the unnecessary financial costs generated by A1 form requests for business trips, the company underlined incoherence with the system of some countries. Thus, if a German employee goes on a business trip for one week in France, arriving each day in the morning on French territory and leaving each day in the evening, the employee has to hold five different A1 forms and cannot apply for a one-week-form. In addition, if the trip is supposed to last for an entire week, but in the end the employee only stays for three days because his assignment is shorter than expected, the A1 form is no longer valid, and a new request should be made to the authority.

HOW TO ACHIEVE BETTER RESULTS

BusinessEurope suggests ensuring that **business trips are not considered as posting**, and that national implementation of posting legislation **avoids disproportionate burdens for companies**.

Further recommendations:

1. The Parliament and Council should quickly agree on a revision of regulations 883/2004 and 987/2009 to **introduce a mandatory exemption for A1 forms** in case of business trips. A possible exemption should also be considered for short-term posting under one month. In parallel, Member States should consider additional ways to relieve administrative burden for companies.
2. The Commission should **take action against Member States that have not implemented the mandatory exemption for short-term posting** foreseen in the directive 96/71 (Article 3 paragraph 2).
3. Member States should **implement the possible exemptions for posting that does not exceed one month**, if the amount of work to be done is not significant or in case of internal transfer as suggested in directive 96/71 (article 3, paragraph 4,5 and 6).
4. The Commission should **develop an EU-wide A1 form** that would be valid in all EU Member States for a specific period of time and would cover several work trips.
5. The Commission, in the framework of the European Labour Agency, should **set up a European "help desk"** to provide information to companies and workers on the legislation applicable in cross-border situations.
6. Member States should make sure that **all necessary information on posting is available on their single national websites** which is a legal obligation under the enforcement directive. Links to all single national websites could be available on the Single Digital Gateway that is currently being set up to facilitate accessibility.



7. The Commission should **take action against Member States that have implemented discriminatory and not proportionate measures** in the framework of the Directive 2014/67.

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Harmonised standards

This paper concerns challenges with the Commission interpreting their role under Standardisation Regulation 1025/2012 in a very extensive manner, causing high compliance costs for companies and delays in market entry.

CONTEXT

Harmonised European standards (hENs) represent a consensus by stakeholders on how to meet market needs, while at the same time they facilitate compliance with EU legislation and support the circulation of goods in the Single Market. Following case law from the CJEU, the Commission started to interpret their role in the system for harmonised standards in a more extensive manner. This has aggravated not only an existing backlog of the publication of harmonised standards, but also includes more prescriptive standardisation mandates. The result is a situation where standards are not available to the users, and manufacturers have to resort to alternative and often costly ways to demonstrate compliance with EU law. This prevents using the potential benefits of Single Market governance, as it unnecessarily complicates EU market access.

LEGAL FRAMEWORK

The problem in this case is caused by a contested Commission interpretation of CJEU rulings. The legal framework for European standardisation is set out in Regulation 1025/2012, but this Regulation leaves some leeway as to what the roles of the different actors are in practice (notably Article 10). In principle, the Commission provides the mandate on the basis of which the European Standardisation Organisations (ESOs) develop the harmonised standards with stakeholders. At the end of the process, the Commission also publishes a reference to the hEN in the OJEU, which is necessary for the presumption of conformity to take effect. However, following case C-613/14 (James Elliott) on construction products, the Commission strengthened its oversight on this process by providing more prescriptive mandates and stricter controls before the publication of all hENs. The interpretation of the Commission's responsibilities, and in particular also extending the implications of this case to *all* harmonised standards, remains contested.

IN PRACTICE

The current situation causes severe challenges for company compliance processes relating to the EU market. Much of the additional burden and legal uncertainty will stay invisible for the external beholder, as they are distributed inside each company.



- **Absence of harmonised standards.** In the absence of a hEN, companies need to demonstrate compliance by creating a technical dossier with risk analyses that essentially repeat, for every individual product design, what standards already prescribe as due risk coverage. This is costly and time consuming and will often involve engagement of a notified body. But even after involvement of a third party in the conformity assessment, the manufacturer is faced with legal uncertainty about acceptance of this evidence by market surveillance authorities in the EU. In the majority of cases (except where products are subject to pre-market approval), the product may easily be taken from the market which causes enormous turnover loss, reputation damage and recall costs. Modifying a well-established compliance process is in itself a substantial burden as well.
- **Link with international standards.** Delays in the harmonisation process mean that the EU adopted version of the standard will run behind the international state-of-the-art standard. Nowadays, that is often the case for more than two or three years. This causes at least a duplication of demonstrating compliance, and often even the need for an EU specific version of the product, or even worse a change to the design and/or manufacturing processes resulting for example in different product lines for different markets. Where mandates for harmonisation do not offer sufficient possibilities to include market-relevant elements linked to international standards, technical differences between EU requirements and those of most other markets even get a permanent character.

While companies will ultimately strive to overcome these challenges, the lack of harmonisation brings additional costs and decreases safety, as there are no detailed uniform requirements for new technologies anchored in standardisation. It also enhances the risk of diverging technical content between EU and international standards, thereby decreasing European competitiveness.

HOW TO ACHIEVE BETTER RESULTS

BusinessEurope recommends the **Commission to refrain from assuming additional responsibilities in the harmonisation of standards** where those affect the roles of other key players in this system, as also reflected in our [joint industry statement](#).

1. Harmonised European standards should be put back in the hands of self-regulating stakeholders, with public authorities at EU and national level in a guiding and guarding role rather than the driving seat. An **independent assessment of the Commission's interpretation of Regulation 1025/2012** is needed.
2. There should be **no bureaucratic interference with planning and execution** of standardisation work by the Commission, and **no excessive setting of requirements for standards** that are incompatible with the nature of standardisation. It is key that there is sufficient **flexibility for stakeholders in the process** as to how achieve ends.
3. The backlog in the citation of harmonised European standards in the Official Journal should be eliminated, and **a swift citation modus should be guaranteed** in the future, which will allow their use for the presumption of compliance by industry.

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Improving Waste Shipment Regulation to facilitate Circular Economy in EU

This paper concerns challenges posed by an outdated Waste Shipment Regulation where companies struggle with inconsistent rules and fragmented enforcement within EU Member States.

CONTEXT

Businesses across Europe are fully engaged in maximising the value of materials, transitioning to circular business models and achieving a circular economy. This can best be achieved through a functioning market for secondary raw materials (SRMs) and circular products. Several challenges and untapped opportunities still remain to create such a market.

One such challenge is the outdated Waste Shipment Regulation (WSR)¹ that hinders the creation of a functioning market for SRMs by making the transport of waste across Member States difficult and expensive. It causes significant inefficiencies in the field of international waste management, including for products destined for remanufacturing and refurbishment. It is also problematic for smaller Member States for which national recycling facilities are expensive.

LEGAL FRAMEWORK

The WSR lays down procedures for shipments of waste for intra-EU trade and between EU member states and OECD countries to prevent issues with uncontrollable waste transport. It includes a ban on exports of hazardous waste to non-OECD countries as well as a ban on the export of waste for disposal. A revision of the rules on waste shipments is foreseen in the new Circular Economy Action Plan for 2021, however this is mainly focussed on ensuring that the EU does not export its waste challenges to third countries. This will aim at restricting waste exports which may have harmful environmental and health impacts and third countries, as well as illegal exports and illicit trafficking. These issues should indeed be addressed but should be complemented with the issues outlined in this paper.

¹ Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste, OJ L 190, 12.7.2006, p. 1.



IN PRACTICE²

Garment and furniture companies experience that it is too complex and too expensive to reprocess their secondary raw materials. During the production processes, these sectors create leftovers such as textiles fabrics, scraps, or other semi-finished products. The leftover percentage may change significantly between 3% up to 21% depending on the degree of efficiency applicable, the materials cost and other variables. Currently, these leftovers are treated as waste and disposed or used in other production, however the costs and process to treat leftovers severely limit the potential of their re-use. Secondary raw materials such as recycled fabric should be viewed as a resource and not waste to encourage Circular Economy.

HOW TO ACHIEVE BETTER RESULTS

Reviewing the WSR will be necessary to ensure appropriate management of hazardous waste and avoid illegal routes, as well as improving access to non-hazardous waste for recycling and recovery. Better results can be achieved by minimising the administrative burden for trading high-quality secondary raw materials by:

- Improving the access to waste for reuse, recycling and recovery to facilitate the transition to a circular economy by **allowing the free movement of non-hazardous waste destined for recovery** and reducing unnecessary administrative requirements. For example, by **reducing time required to authorise shipments and exploring the opportunities of digitalisation** (e.g. switching from a paper-based system to an electronic one).
- **Minimising fragmented enforcement within EU Member States** and make sure that transportation of waste in the EU is regulated and handled in the same way. BusinessEurope encourages the **development of guidance** that clarifies the implementation in different countries and the links between the different types of legislation. Logistics of the companies should not be dependent on national borders.
- Making transportation of waste for reuse and recycling less burdensome, both economically and administratively. For example, by **clarifying and harmonising definitions and criteria on recycling, recyclability, reusability and closed loop at EU level** and aligning them with existing EU legislation to create a genuine Single Market in this area (and where possible with international standards). If these issues cannot be dealt with under the WSR, they should be taken care off as soon as possible because they have important effects on the WSR's workings.
- Keep high **quality and transparency in waste shipment. A regulatory framework should be set up to import secondary raw materials** from regions without ambitious recycling systems. These waste imports should have a clear purpose: to feed into the circular economy and be used as valuable raw material for European products.

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² For more examples, please visit www.circularity.eu



Points of Single Contact

This paper concerns shortcomings in terms of access to information on Single Market rules and procedures, as there exist multiple information sources and different contact points across EU legislation.

CONTEXT

Companies that wish to export goods and services often face difficulties trying to obtain information about what rules to comply with (national and EU rules), which procedures to follow and which public authorities to contact in Member States they wish to export to.

It is important to ensure a transparent and clear legal base for European companies. When the regulatory environment becomes too complex, there is a risk that SMEs will stop exporting and instead stick to their national market where they already know the rules.

The existing complexity can be illustrated in all the different contact points that have been set up in various EU regulations. They do not cover all business-related aspects nor information about the entire range of requirements that a company must comply with.

LEGAL FRAMEWORK

Companies that export goods or services to other EU Member States must comply with all requirements on the market in question. According to existing Single Market legislation, Member States must make information available to companies through Points of Single Contact. The information obligations are imposed in at least eight different regulations.¹ Some non-exhaustive examples of rules and requirements that companies must comply with when accessing another market are:

- Requirements regarding technical approval
- Requirements regarding registration of the company
- Documentation of the company's eligibility

¹ the Services Directive (2006/123/EC), Mutual Recognition Regulation (764/2008), Recognition of Professional Qualifications Directive (2005/36/EC), Directive on the enforcement of Directive 96/71/EC concerning the posting of workers (2014/67/EU), Marketing of Construction Products Regulation (305/2011), Guidelines for trans-European Energy Infrastructure Regulation (347/2013), Directive on Electronic Commerce (2000/31/EC) and Regulation on a Framework for the free flow of non-personal data in the European Union (COM(2017)495).



- Requirements for permits, licences, authorisations
- Registration of posted workers
- Various documentation concerning the posted workers/staff (qualifications, skills, health etc.)
- Requirements regarding local safety certificates and other work environment issue
- Various VAT and tax issues, including registration of staff at local authorities

In 2018, the European Parliament and Council adopted a regulation establishing a Single Digital Gateway (SDG). The SDG will become the online access point for EU citizens and business in need of information to get active in another EU country. The SDG will also facilitate access to procedures and assistance services such as Points of Single Contact. The SDG will increase online access, however multiple points of single contact will continue to exist depending on different EU legislation and procedures will remain not fully digitized.

EXAMPLE

A manufacturing company and service provider is experiencing increased complexity in the procedures, registration and documentation requirements concerning posting of workers in some Member States. The company operates across EU providing maintenance services on production equipment it has manufactured.

In some Member States, the company must consult several websites – at times only available in the local language - to obtain an overview of the relevant requirements, such as posting of workers or relevant permits. Still, due to the fragmented information, the company does not feel certain that it has everything in order. Nonetheless, it has to fulfil its contractual obligation to provide the services. Considering that some Member States issue excessive fines for non-compliance, the lack of transparency puts this company in a very uncomfortable situation when fulfilling its service contracts.

HOW TO ACHIEVE BETTER RESULTS

The best way to improve information access, is to **provide business with all procedures and necessary information in one “Single Market access point”** accessible also through the SDG. The following actions are needed:

1. **Availability of comprehensive information and e-procedures**, regardless of whether the request originates from a national or foreign business.
2. Provision of **one single, coordinated answer** from a contact point in the Member State concerned, whenever an inquiry is submitted by a business.
3. Information and **relevant documents in English** as default, on top of the official national languages and any other languages chosen by the Member State concerned.

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European company law form designed for SMEs

This paper concerns small and medium-sized companies (SMEs) challenges to establish companies across EU due to linguistic, administrative, or legal differences between Member States. BusinessEurope is therefore advocating for a new instrument that facilitates expansion of activities in the EU.

CONTEXT

SMEs account for over 99% of companies in EU, but only 2% of the European SMEs invest abroad by establishing companies there¹. This is due to linguistic, administrative, and legal differences between Member States, which makes it difficult to create subsidiaries abroad.

Further, solely 3% of start-ups become scale-ups in Europe. This rate is too low and underlines the need for a legal vehicle allowing companies to better manage their expansion within the European Union. Business need common rules to structure themselves as European business.

LEGAL FRAMEWORK

The recently adopted European company law package is intended to facilitate some cross-border mergers (e.g. conversion, divisions, and mergers) but relies (and refers to) heavily on national laws on detailed procedures.

The Societas Europaea (European Company Statute), that already exists, has not picked up on the issue as expected due to its complexity, inaccessibility for smaller companies (e.g. minimum share capital of EUR 120.000) and numerous references to national law.

There is a gap between a company law form designed for SMEs which can take inspiration from the European Company Statute and previous proposals more focused on the smaller SMEs.

One of the central proposals of the Commission's 2008 Small Business Act tried to introduce a European company form (also known as Societas Privata Europaea).

¹ Annual Report on SMEs 2017/2018: Special Background Document on Internationalization of SMEs, p.7



Despite of the strong support of several Members States and the wide business community, the SPE proposal was withdrawn in 2013.

In 2014, the Commission brought forward a proposal to harmonise national company law on single-member limited liability companies (SUP), allowing companies to establish subsidiaries in any of the EU Member States. The proposal was, however, also withdrawn in 2018.

EXAMPLE

A Copenhagen-based bike sharing service that serves 10,000 bikes across 12 cities in Europe has established companies across EU to increase the chance of winning local tenders and to fulfil legal requirements regarding employees or leasing of vans. The company has among others bought existing companies in Spain and Germany and started new companies in the Netherlands and Hungary.

For the company, as an SME, it is a difficult and expensive process to acquire or establish companies in other EU countries. There are different legal conditions that apply across EU which the company needs to investigate each time: for example, what a director of a German or Hungarian company is liable for. In some Member States, it is required that all directors of the company are physically present when registering a company and setting up a bank account. However, in other Member States, it can all be done online. There are also burdens in connection to translation, traveling costs, and obtaining important documents. This creates a risk and financial burden every time the company wants to scale up and sell in a new EU country. Each time, they must do a lot of research before determining their investment.

HOW TO ACHIEVE BETTER RESULTS

Create a new European company law form designed for SMEs. EU should continue to explore the possibilities around providing an instrument that facilitates expansion of activities in EU. The form should among others:

1. **Be a limited liability company** available to all, on a voluntary basis, whether natural or legal persons, single or multiple shareholders.
2. **Have no compulsory cross-border character** but it should have the possibility to transfer the company to any Member State, without any dissolution or creation of a new legal person.
3. Be eligible to be **formed from scratch**, in order to foster entrepreneurship.
4. **Have significantly larger contractual liberty** with reference to the regulation, to the company's statutes and, only where necessary, to national law.
5. **Low entry minimum capital.**

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Transport infrastructure and systems

This paper concerns inadequate or missing cross-border transport infrastructure and electronic systems. While (partial) frameworks exist, progress towards a complete and frictionless EU-wide transport infrastructure network is too slow.

CONTEXT

Europe's transport network lies at the heart of the EU Single Market as a key enabler for the free movement of people, goods, and services. The efficiency of transport services and the interconnection between all modes directly affects the impact on the environment, cross-border value chains, and the competitiveness of EU industry as a whole.

Yet businesses experience that Europe is not yet fully connected. In particular Europe's transport infrastructure network does not deliver. In many places, cross-border connections are inadequate (insufficient capacity) or completely missing, and often national digital systems or physical requirements are not compatible.

LEGAL FRAMEWORK

- **Trans-European Transport Network (TEN-T)** policy is set out by the TEN-T Guidelines ([Regulation 1315/2013](#)) which, among other things, define the setup of the network, the infrastructure requirements and its governance. During 2020 the European Commission is reviewing the Guidelines to determine if they are still fit for purpose in the context of ongoing trends such as decarbonisation and digitalisation. The main funding instrument at the EU level is the Connecting Europe Facility (CEF). Grants should continue to be the cornerstone of the EU investment policy for the transport sector and it is therefore positive that the Commission, in the renewed MFF 2021-2027, has suggested an additional EUR 1.5 billion boost to trans-European infrastructure through the Connecting Europe Facility.
- A concrete EU [Action Plan](#) was released on the **European Rail Traffic Management System (ERTMS)** to ensure all rail infrastructure on the TEN-T core network is equipped with ERTMS by 2030, complemented by national [Implementation Plans](#).
- **The Single European Sky** has been developed on the basis of various legislative packages aiming to modernise Europe's ATM system in terms of operation, technology, control, and supervision. The latest package ([SES 2+](#)) was released by the European Commission in 2013 – however, it has since been stuck in Council as a result of the British-Spanish territorial dispute over Gibraltar.
- **Airport capacity** is essentially a Member State competence. EU action in this area seeks to find common issues and solutions and to support national efforts where

appropriate. In particular, the stakeholders and Member States are brought together at the EU Observatory on Airport Capacity and Quality.

EXAMPLE

In 2017, the “Rastatt Incident” clearly demonstrated the fragility and static nature of the EU’s transport network. It also highlighted the importance of improving interoperability and capacity of the overall network. A highly used section along the Rhine-Alpine rail freight corridor (connecting the Ports of Amsterdam/Antwerp/Hamburg with Italy/Switzerland) was closed for seven weeks after a tunnel collapsed. It caused severe disruption as alternative routes were inadequate. It has been estimated that the interruption resulted in approximately EUR 2 billion in damages: EUR 969 million for rail freight operators, EUR 771 million for manufacturing industries, and EUR 308 million for other industries such as infrastructure managers.

HOW TO ACHIEVE BETTER RESULTS

All modes of transport (air, rail, road, etc.) need to become increasingly interoperable as in combination they can offer more efficient transport solutions. Especially with the expected increase in demand for transport services, progress is urgently needed on Europe’s transport infrastructure network.

- The **TEN-T** must be completed on time, with a focus on infrastructure projects with the **highest EU added value**.¹ Moreover, better alignment is needed with other policy objectives in the sector, such as decarbonisation and the digital transformation.
- The availability of **safe and secure parking areas** for truck drivers needs to be improved so that transport operators can comply with binding provisions on resting times. Today, around 100.000 parking areas are still lacking for heavy duty vehicles.²
- The **ERTMS** must be rolled out at a greater speed. Only 8% of TEN-T core network corridors that need to be equipped with ERTMS by 2030 have been put into operation.
- The **Single European Sky** needs to be completed as a priority and effectively implemented. The current structure involving 36 national air traffic management (ATM) bodies remains fragmented. Modernisation and improved interoperability will allow for more efficient air transport and lower CO2 emissions in the sector.
- **Airport capacity** is set to become a major issue facing air transport in the coming decades, with a predicted 8% capacity gap in 2040.³ Obstacles to capacity improvement such as planning issues and efficient airport processes need to be addressed.

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¹ The TEN-T *core* network by 2030 and the TEN-T *comprehensive* network by 2050.

² Commission [Study](#) on Safe and Secure Parking Places for Trucks, 2019.

³ EUROCONTROL 2018 [Report](#) on Challenges of Growth.