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EUROPEAN COMMISSION

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## **COMMISSION STAFF WORKING DOCUMENT**

### **IMPACT ASSESSMENT**

**accompanying document to the**

**Proposal for a Regulation (EU) of the European Parliament and of the Council No  
xx/yy on the professional cross-border transportation of euro cash by road  
between euro-area Member States**

**and the**

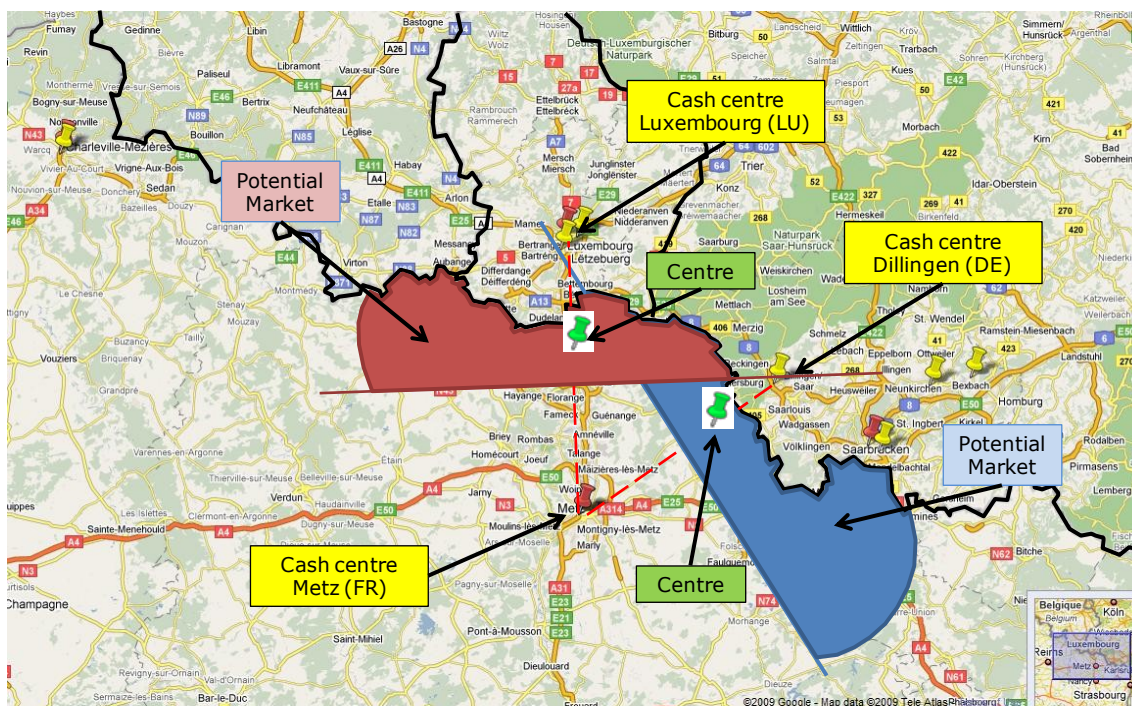
**Proposal for a Council Regulation (EU) No zz/yy concerning the extension of the  
scope of Regulation (EU) of the European Parliament and of the Council No xx/yy  
concerning the professional cross-border transportation of euro cash by road  
between euro-area Member States**

**{COM(2010)377 final}  
{SEC(2010) 877final}**

## ANNEX 5 – ESTIMATION OF POTENTIAL SAVINGS IN TRAVEL DISTANCE RESULTING FROM CROSS-BORDER CIT TRANSPORTS – CONTINUED FROM VOLUME IV

(The below estimation has been carried out by the external consultant Ramböll management. The full study is available at: [http://ec.europa.eu/economy\\_finance/articles/euro/2010-02-26-cross-border-cash\\_en.htm](http://ec.europa.eu/economy_finance/articles/euro/2010-02-26-cross-border-cash_en.htm) )

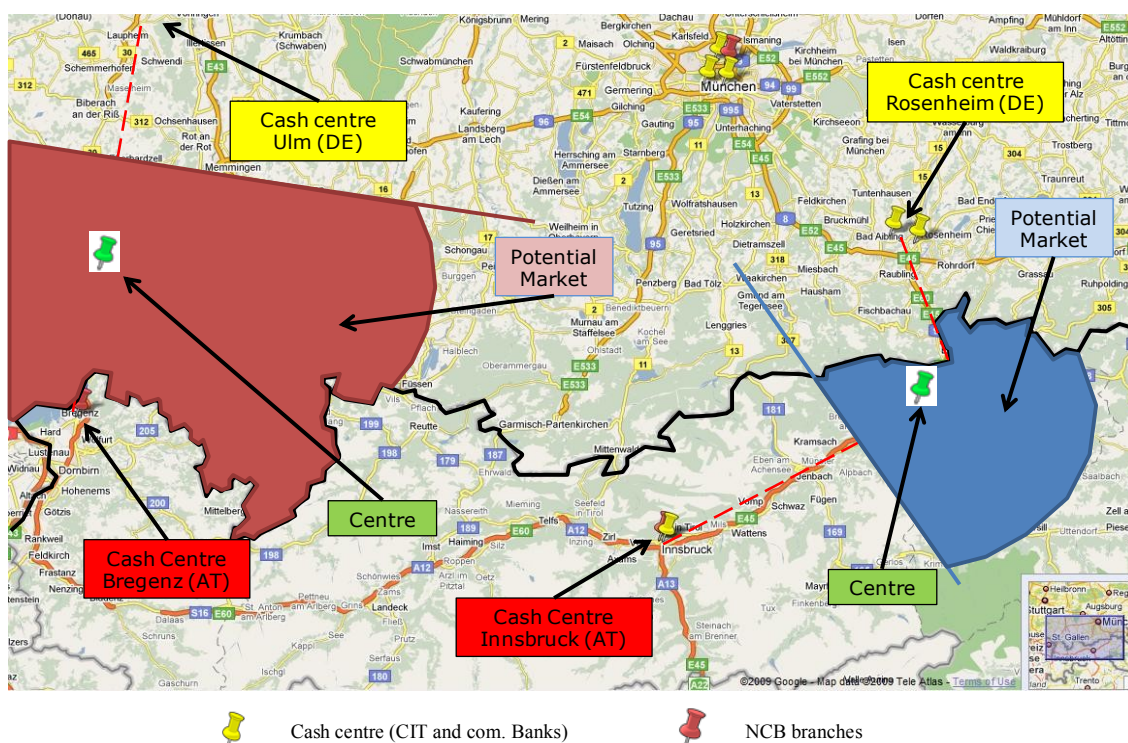
**MAP 2** **EXAMPLE 2: DISTANCE SAVINGS IN MAP 6:**  
**BELGIUM/LUXEMBOURG/FRANCE**





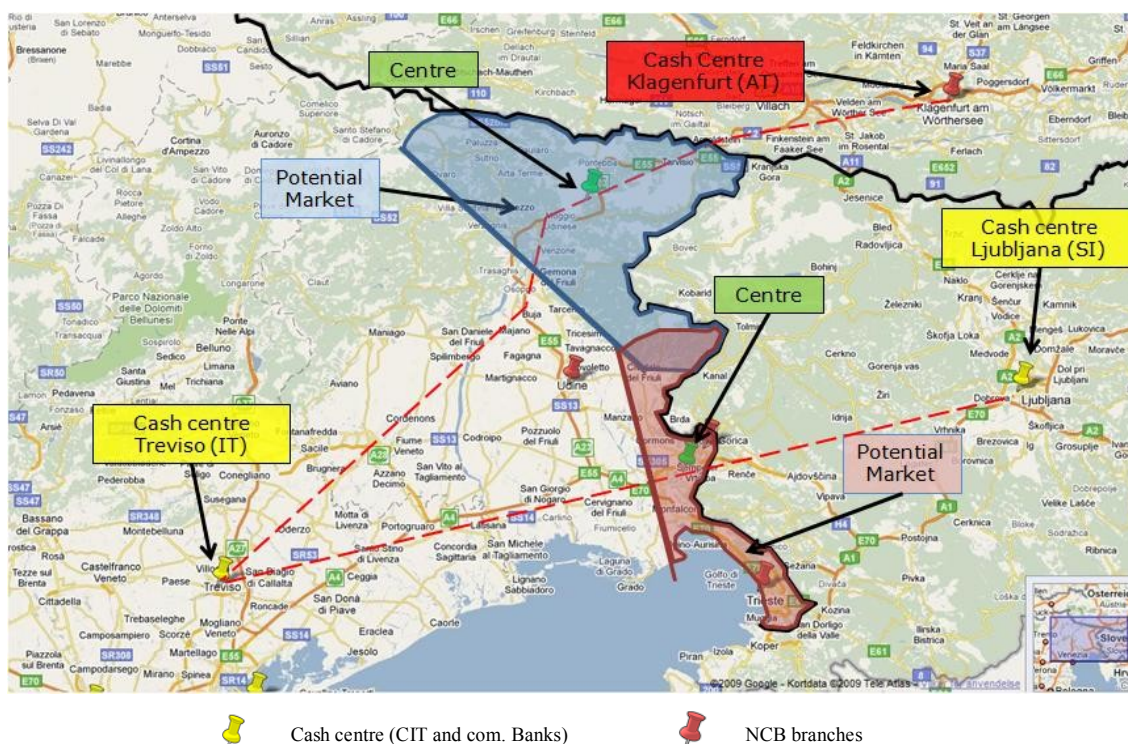
MAP 3

EXAMPLE 3: DISTANCE SAVINGS IN MAP 8 – AUSTRIA/GERMANY A



MAP 4

EXAMPLE 4: DISTANCE SAVINGS IN MAP 12 – AUSTRIA/SLOVENIA/ITALY



It should be emphasised that the estimated savings in distance travelled assuming that all current border obstacles are lifted will accrue regardless of whether commercial banks or retailers have business activities on both sides of the border. It should further

be emphasised that the long-term estimation of the savings in travel distance is based on the current allocation of the existing cash centres and not on a possible future allocation of cash centres.

On the basis of the described approach and its preconditions, it is possible to estimate the savings in travel distance for each of the 19 examined border areas. It should be emphasized that this is a simplified and theoretical exercise, which nevertheless could provide a rough indication of the magnitude of these savings.

The estimated savings in travel distance vary significantly. Thus, while the average savings pr either outgoing or ingoing trip is 19 km, the standard deviation is 13.9 km.

The estimated savings pr trip can be aggregated into total savings pr. day and pr. year by multiplying with the estimated number of cross-border CIT transports cf. above. The results show that cross-border CIT transports can save around 2.8 million km pr year in the long-term and 2.0 million km pr year in the short-term or 0.8 and 0.6 percent, respectively, out of the total kilometres that CIT companies travel pr year, cf. Table 1 below<sup>1</sup>.

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<sup>1</sup> The calculations have been made on the basis of unrounded figures for transport/day. Consequently, they do not add up to the sums of total.

**TABLE 1 ESTIMATED TOTAL SAVING IN TRAVEL DISTANCE DUE TO CROSS-BORDER CIT TRANSPORTS**

Border  Region	Long-term CIT transports  pr day	Short-term CIT transports  pr day	Average distance savings  pr transport	Long-term		Short-term	
				Average distance savings	Average distance savings	Average distance savings	Average distance savings
	(transports/ day)	(transports/ day)	(km/ transport)	(km/day)	(km/year)	(km/day)	(km/year)
Map 1: NL/DE – A	9	5	53	452	162 575	242	86 978
Map 2: NL/DE – B	12	9	14	164	58 864	124	44 736
Map 3: BE/NL	12	11	24	288	103 680	275	99 066
Map 4: BE/DE/NL	17	15	51	836	300 879	761	273 800
Map 5: BE/FR	9	8	22	188	67 504	171	61 428
Map 6: LU/FR/DE/BE	51	46	28	1 419	510 821	1 291	464 847
Map 7: FR/DE	17	10	8	134	48 174	82	29 386
Map 8: AU/DE – A	16	13	69	1 072	385 905	895	322 231
Map 9: AU/DE-B	10	9	37	372	134 058	339	121 992
Map 10: AU/SI	4	2	60	210	75 600	144	51 786
Map 11: AU/SI	4	2	30	134	48 060	61	22 108
Map 12: AU/SI/IT	12	5	62	724	260 582	333	119 868
Map 13: IT/FR - A	9	1	23	196	70 678	17	6 008
Map 14: IT/FR - B	11	4	26	284	102 155	109	39 330
Map 15: FR/ES - A	4	1	108	408	146 704	157	56 481
Map 16: FR/ES - B	5	3	48	253	91 182	136	48 782
Map 17: ES/PT - A	10	8	34	355	127 792	270	97 122
Map 18: ES/PT - B	2	1	78	182	65 341	97	34 957
Map 19: ES/PT - C	1	0	4	3	1 199	1	462
Total	212	155	779	7 672	2 761 752	5 504	1 981 368
				0.78%	0.78%	0.56%	0.56%

The associated savings in fuel and CO<sub>2</sub> emissions can be roughly estimated by applying some key characteristics and assumptions regarding a typical CIT vehicle:

- Mercedes Sprinter 315 or 316 is a typical model used for CIT-transports in Europe.
- Fuel consumption for a fully loaded Mercedes Sprinter (3.5 tonnes) is around 1.2-1.3 litres of diesel/10 km.
- For a fully armoured Mercedes Sprinter fuel consumption increases with 20-25 percent.
- Fuel consumption therefore varies within a range of 1.2-1.6 litres depending on the level of armouring. A mid-range estimate could then be 1.4 litres of diesel/10 km.
- The CO<sub>2</sub> emissions of a fully armoured Mercedes Sprinter is 0,31 kg/km

On the basis of the above information and estimations it is possible to assess the total savings in fuel and CO<sub>2</sub> emissions that accrues from cross-border CIT transports, cf. Table 2 below. In the long-term the annual savings in fuel are 0.4 million litres of diesel, while the savings in CO<sub>2</sub> emissions are 800 tonnes and in the short-term the corresponding savings are 0.3 million litres of diesel and 600 tonnes CO<sub>2</sub>.

**TABLE 2 ESTIMATED TOTAL SAVING IN FUEL AND CO2 EMISSIONS FROM CROSS-BORDER CIT TRANSPORTS**

Border region	Diesel consumption				CO2 emission			
	Long-term		Short-term		Long-term		Short-term	
	Savings pr day	Savings pr year	Savings pr day	Savings pr year	Savings pr day	Savings pr year	Savings pr day	Savings pr year
	(litre/day)	(litre/year)	(litre/day)	(litre/year)	(kg/day)	(kg/year)	(kg/day)	(kg/year)
Map 1: NL/DE - A	63	22 761	34	12 177	138	49 789	74	26 637
Map 2: NL/DE - B	23	8 241	17	6 263	50	18 027	38	13 700
Map 3: BE/NL	40	14 515	39	13 869	88	31 752	84	30 339
Map 4: BE/DE/NL	117	42 123	106	38 332	256	92 144	233	83 851
Map 5: BE/FR	26	9 451	24	8 600	57	20 673	52	18 812
Map 6: LU/FR/DE/BE	199	71 515	181	65 079	435	156 439	395	142 359
Map 7: FR/DE	19	6 744	11	4 114	41	14 753	25	8 999
Map 8: AU/DE - A	150	54 027	125	45 112	328	118 183	274	98 683
Map 9: AU/DE-B	52	18 768	47	17 079	114	41 055	104	37 360
Map 10: AU/SI	29	10 584	20	7 250	64	23 153	44	15 859
Map 11: AU/SI	19	6 728	9	3 095	41	14 718	19	6 770
Map 12: AU/SI/IY	101	36 482	47	16 782	222	79 803	102	36 710
Map 13: IT/FR - A	27	9 895	2	841	60	21 645	5	1 840
Map 14: IT/FR - B	40	14 302	15	5 506	87	31 285	33	12 045
Map 15: FR/ES - A	57	20 539	22	7 907	125	44 928	48	17 297
Map 16: FR/ES - B	35	12 766	19	6 830	78	27 925	41	14 940
Map 17: ES/PT - A	50	17 891	38	13 597	109	39 136	83	29 744
Map 18: ES/PT - B	25	9 148	14	4 894	56	20 011	30	10 706
Map 19: ES/PT - C	0	168	0	65	1	367	0	141
Total	1 074	386 645	771	277 391	2 349	845 787	1 686	606 794



## **ANNEX 6 – FINAL MINUTES OF MEETING WITH SOCIAL PARTNERS**



### **EUROPEAN COMMISSION**

DIRECTORATE GENERAL  
ECONOMIC AND FINANCIAL AFFAIRS  
Macrofinancial Stability  
**Economic aspects of regulatory policy**

Brussels, 16 April 2010

ECFIN/E-3/Ares(2010) 197155

### **FINAL MINUTES OF THE MEETING WITH THE SOCIAL PARTNERS ON THE IMPACT ASSESSMENT OF A POSSIBLE DRAFT EU REGULATION ON PROFESSIONAL CROSS-BORDER TRANSPORTATION OF EURO CASH BY ROAD**

Held on 19 March 2010, 14:15–18:30

Conference Center Albert Borschette, Room 4A, Rue Froissart 36, Brussels 1040

#### **INTRODUCTION BY THE CHAIRMAN**

The Chairman welcomed the participants and opened the meeting.

#### **1) ADOPTION OF THE DRAFT AGENDA**

The draft agenda was adopted without any changes.

#### **2) STATE OF PLAY OF THE INITIATIVE**

The Chairman recalled that consultations with stakeholders, including the social partners, had started before the summer in 2008 and the White Paper with some envisaged common rules in annex had subsequently been adopted by the Commission in May 2009. The envisaged common rules had thereafter been discussed in an expert group with representatives of Member States' administrations during the remainder of 2009. The discussions in the expert group had led to a high degree of consensus on a set of common rules for professional cross-border euro cash transport by road, which had been sent to meeting participants in advance of the present meeting (the two non-papers).

The next step was the examination by the Commission's impact assessment board of the draft impact assessment the following week. The draft impact assessment would

subsequently be revised and finalised and followed by a formal Commission inter-service consultation before the Commission as a body could adopt a proposal for an EU Regulation. This was expected to take place towards the end of the second quarter 2010. The adopted Commission proposal would thereafter be discussed in the Council and the European Parliament under the co-decision procedure before the Commission proposal could be adopted and enter into force.

The purpose of the current meeting was to inform the social partners about the envisaged proposal in the non-paper and to give the social partners a possibility to comment on the draft impact assessment and in particular on the possible social impact of the proposal and the draft rule on remuneration of CIT-staff carrying out cross-border cash transport.

### **3) THE ENVISAGED COMMON RULES FOR PROFESSIONAL CROSS-BORDER TRANSPORT OF EURO CASH**

The Commission-ECFIN representatives made a detailed presentation of the envisaged common rules included in the two non-papers submitted in advance of the meeting.

Ver.di considered it unfortunate that the non-papers and impact assessment had not been translated. The Chairman replied that these were draft documents that only existed in English. It was standard practice that the actual policy proposal would only be translated following the formal Commission inter-service consultation, that is to say just before the adoption of the proposal by the Commission as a body.

ESTA wondered whether a cross-border CIT-licence would be valid for one or for several host countries. The Commission representative replied that if a CIT-company had been granted a cross-border CIT licence, this would be valid in all countries covered by the Regulation. However, the CIT-company would be required to inform the granting authority sufficiently in advance about the name(s) of the Member State(s) where it intended to carry out CIT-transport. The home country authorities would subsequently inform the relevant host country(ies).

FeS-UGT asked what kind of training should be provided during the foreseen 200 hours of initial training, whether it would be general training or a specific CIT-training and argued that there should also be provisions on monitoring of the standard of the training.

The Commission representative explained that what was foreseen was a minimum requirement that CIT-staff must have successfully followed at least 200 hours of initial training. It was furthermore specified that this minimum number of hours should cover a number of cross-border items enumerated in the Regulation. Specific monitoring arrangements were not laid down in the non-paper but left to Member States' competence, since the way this was organised could vary considerably between Member States. The Chairman furthermore recalled that during the previous consultation process, the Commission-ECFIN had committed to take on board a possible agreement between the social partners specifying the content of cross-border CIT-training.

ESTA said that there was already an agreement between Uni-Europa, CoeSS and ESTA on the content of the cross-border training, while an agreement on some other related

issues had not been found. The Chairman invited the social partners to provide the text of such an agreement to the Commission-ECFIN as soon as possible.

ESTA pointed out that it would be important to foresee a sufficient transition period before the entry into effect of the new cross-border transport rules, so that operators had the time to adapt. The Chairman agreed that it was indeed necessary to provide for transitional arrangements. This could, for example, be achieved by foreseeing some time between the adoption of the new rules and their entry into effect.

On a question from ESTA and CoESS about penalties, the Commission representative clarified that the main responsibility for penalties lay with the home Member State (which issued the cross-border licence), but that it was also foreseen that the host Member State could issue penalties, including a suspension of the right to carry-out CIT activities on its territory. It was furthermore indicated that sanctions should always be proportionate to the severity of the infringement.

ESTA considered that the armouring standard for the trucks was not sufficiently detailed and suggested to add references to shooting distance, velocity etc in line with the common parameters used by the industry. The Chairman recalled that the current wording on armouring standards had been discussed in detail in the expert group of Member States, but suggested ESTA to transmit these parameters to the Commission for its consideration.

CoESS pointed out that the non-paper did not say anything about the possible use of uniform in the case of transport of banknotes in an unarmoured vehicle with clear markings that it is equipped with IBNS. The Chairman clarified that this meant that the Regulation left open the possibility of using a uniform but did not impose it.

Finally, the Chairman clarified that for the purpose of the examination of the implementation of the future Regulation and the related review, the social partners should be consulted and that this would be explicitly mentioned in the non-paper.

#### **4) EXCHANGE OF VIEWS ON THE POSSIBLE IMPACTS OF THE ENVISAGED RULES**

The Commission representative made a presentation of notably the potential economic and social impact of the envisaged rules as well as the envisaged rule on remuneration of CIT-staff carrying out cross-border transport. He thanked the social partners for the information provided on salaries and invited them to provide data also for the remaining countries and to signal possible factual errors in the data related to salaries in the draft impact assessment.

According to the external study that had been launched, the potential long-term market for cross-border transport of cash would amount to some 3 % of the total value ordered to CIT-companies, with considerable variations between countries. This would represent a significant increase compared to current situation, but was still a limited market.

Significant wage differences between neighbouring countries seemed furthermore to exist in some cases. It could therefore be justified to mitigate the potential social impact in the host country of possible wage competition. Due to the specific characteristics of

the CIT-sector (frequent and short-term nature of postings abroad) there was however a need to clarify the application of the Directive on the posting of workers (PWD) for this type of transport operations to ensure that it was possible to apply in practice. The envisaged rule would make clear that the Directive applied to all cross-border transports carried out under the future Regulation and that the minimum protection would be limited to the minimum rates of pay according to the definition of the PWD (which could include different allowances, premiums etc depending on the situation in the host Member State). It should furthermore be clarified that the minimum rates of pay of the host country should apply for the whole day (if higher than the posted worker's actual salary), even though the worker only spent part of the day there. Finally, if the CIT-staff spent more than 100 days in another Member State, not only the minimum rates of the host country but all the terms and conditions according to the PWD should be applied fully (i.e. also regarding holidays, health, safety and hygiene at work etc).

During the following discussion, ESTA and ver.di, pointed out that there were currently no minimum rates of pay in force in Germany and they wondered how this situation would be addressed by the Commission. This issue would be very relevant if, for instance, Poland would opt-in to the Regulation or introduce the euro in the future. The Chairman replied that the possibility to declare collective agreements in the CIT-sector (which are concluded at the level of each Land) universally applicable existed in Germany, but had not been used yet. It was thus in the hands of the German authorities whether the foreseen minimum protection was to be applicable in Germany.

Ver.di furthermore considered that the minimum rule proposed in the non-paper would not solve the issue of the low salaries in some of the collective agreements in Germany.

Uni-Europa and CoESS recalled that they agreed that the highest salary should apply in a cross-border situation and called on the Commission to foresee this in the upcoming Regulation. ESTA furthermore pointed out that salaries represented 60-70 % of the operating costs in the sector, meaning that wage differences would have a very direct impact on the competitiveness and market shares of the individual CIT-companies. The Chairman replied that the Commission services had been working hard on a workable rule on minimum protection. The envisaged rule followed existing principles in EU law and was intended to ensure their practical applicability in the sector. He stressed that the Commission was there to hear the views of the social partners and he took note of their common position on salaries, but pointed out that he did not see any possibility of deviating from the recognised principle of minimum protection for workers by introducing a rule in the future Commission proposal on maximum protection in this specific sector.

During the subsequent discussion, the social partners made the general comment that they did not consider that the social impact of the envisaged common rules had been sufficiently assessed. They furthermore made a number of specific remarks or requests for clarifications, in particular with regard to the applicability of specific health and security clauses (including on rehabilitation in case of accidents/attacks) in national collective agreements in the CIT-sector during work periods abroad, the applicability of pension rules during work periods abroad as well as applicable rules and sanctions during work periods abroad as regards the use of drugs and alcohol. Clarification was furthermore needed on the wage elements that are included in the 'minimum rates of pay' in the different Member States. The employment effects of the Commission's

proposal as well as the impact of a possible opt-in of non-euro area countries should be examined in the impact assessment and, finally, the adjustment cost (i.e. the cost of complying with the Commission's proposal) should be better assessed in the impact assessment.

The Chairman took note of the remarks and requests for clarifications. He concluded that the Commission would look into these issues and try to find answers as far as possible, while pointing out that the level of analysis in the impact assessment should at the same time be proportionate.

The Chairman thanked the participants for their contributions and closed the meeting.