Local and Regional Government Finland

Kemppainen Hanna

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Government decree on amending the Decree on the Use of Vehicles on the Road
A position paper of the Association of Finnish Local and Regional Authorities

On 30 November 2018, the Ministry of Transport and Communications announced that in its reply to Finland's prenotification, the European Commission holds that Finland's proposal for a decree permitting long vehicle combinations conforms to EU regulations. However, according to the information received by the Association of Finnish Local and Regional Authorities, stakeholders have an opportunity to comment on the Government proposal for an amendment to the decree during EU notification procedure. The comments can be submitted to the Commission until 27 December 2018.

The proposed amendment to the decree permits the use of longer, up to 34.5 metre-long vehicle combinations in the entire Finnish road network without a separate permission.The justifications for the amendment are reduced CO_2 emissions and benefits in terms of transport economy.

In road safety issues, the drafting process has focused on assessing vehicle technologies, and less attention has been paid to the environmental (transport corridors, space requirements, environmental nuisance) and human (the driver, other road users) perspectives.

The estimated benefits derived from the reduction of CO_2 emissions are overrated. The reduction from total road transport emissions would be less than one per cent at most (Finnish Transport Agency Report 57/2017). It is possible to achieve corresponding reduction in emissions by several means, such as a renewal of the fleet and better use of systems for monitoring tyre pressure. In other words, the benefits derived are not significant, especially in comparison with the disadvantages caused by the change.

The impacts on road safety have not been studied adequately, and the risks related to the difficulties of controlling long vehicle combinations have not been assessed in challenging driving situations and in built-up areas in particular. New research shows that in challenging driving situations, the last unit of complex vehicle combinations is practically uncontrollable by the driver due to long delay [1]. What is more, Finland has trialled specially authorised high capacity transport (HCT) vehicle combinations for only five years (In February 2018, 43 HCT vehicle combinations were in traffic). They have been trialled on routes that have been examined beforehand for their suitability. In extremely bad road conditions, some of the units of HTC combinations have been removed or the vehicle has been withdrawn from service. This means that there is little research data on the most challenging road conditions, which are common in Finland. Other research data is also limited and has not yet been assessed to any great degree.

Association of Finnish Local and Regional Authorities
P.O. Box 200
Toinen linja 14
FI-00101 Helsinki, Finland
Business ID 0926151-4

Telephone +358 9 7711
firstname.lastname@kuntaliitto.fi
www.localfinland.fi

Studies indicate that the competitiveness of rail transport will improve in the future. It has been concluded that this would likely lessen the potential for modal shift from rail to road. However, this is not in any way certain.

The decree has not been prepared in line with good legislative practice. Instead, the municipalities have been overlooked in the preparation process, and they have not been given information in an open manner. The municipalities did not receive information on the ongoing preparation until on 31 January 2018 when the Ministry of Transport and Communications issued a media release on the matter. Furthermore, municipalities were not directly requested to give their opinion on the matter in spring 2018. The impacts of the proposal and the needs for changes in and costs for the municipal road network have not been assessed, despite the fact that it is the legislator's task to carry out impact assessments. That the largest municipalities were asked to identify problematic areas in their road networks when the decree proposal was already subject to notification cannot be considered adequate assessment. Finland has 311 municipalities, but the request for assessment was sent to some thirty municipalities, of which only seven responded. The municipalities are of the opinion that in the municipal road network, it should be possible to direct longer vehicle combinations only to specific routes suitable for their use and, as a general rule, these vehicle combinations should be prohibited from operating in the munical road networks.

The decree's starting point is that road keepers (local and central government authorities and private road keepers) have to separately forbid the movement of these vehicle combinations on the roads where they cannot be allowed to operate, instead of their being allowed only on routes that are suitable for them. In practice, this would mean that municipalities would have to specify the maximum vehicle length for the majority of their road networks and sign the roads accordingly. This would cause them considerable extra costs and bureaucracy. The municipalities might also be forced to make arrangements for granting special permits. It would be in nobody's interest if Finland had a complex patchwork of permit procedures. After all, the decree's purpose has been to minimize detriment from special permit procedures to transport entrepreneurs.

The Association of Finnish Local and Regional Authorities advocates for all Finnish cities and municipalities. The Association's core tasks are to advance the interests and development of municipalities and their partner organisations and to provide services for them.

1 Jere Lehtinen, Nonlinear Lateral Dynamic Behavior of High Capacity Transport Vehicle, Master's Thesis 2015, Aalto University

Association of Finnish Local and Regional Authorities

Jarkko Huovinen
Director, Urban Planning, Infrastructure and the Environment

Hanna Kemppainen
Adviser, Municipal Infrastructure