

Dear Member of the TRAN Committee,

## **Flexible break distribution for occasional passenger service a key issue for the Nordic countries**

We, the Nordic Bus and Coach industry organizations, would like to draw particular attention to the Commission's proposal for special provisions on driving times and rest periods for bus and coach drivers in occasional coach transport.

We would in particular like to raise the importance of the proposal regarding giving more possibilities to split the break in more ways than today's regulation. This amendment is beneficial to the driver as it opens additional possibilities for distributing the breaks, but the total amount remains the same.

This is therefore a particular feature of the scope of the Commission's proposal, namely occasional passenger services, where distances are often long. This is also particularly the case in the Nordic countries, where there is no dense network of stops and rest stops and/or where there is not yet an adequate distribution network for new alternative fuels, which is already typical of local public transport. In addition, the location, time and length of the break must take into account the fact that in many situations passengers will be accompanying the vehicle.

**The 45-minute break (per 4.5 hours driving time) must be freely divided into two or three parts of at least 15 minutes each.**

This would be a much-needed change in terms of transport efficiency and customer service. The distribution of breaks according to the nature of the journey should therefore be regulated in a way that supports customer service and takes into account the possible availability of suitable break locations. This would also have a positive impact on the working environment and well-being of bus and coach drivers, which is a key aspect in the current labor shortage situation.

It should also be stressed that the existing intelligent tachographs allow the authorities to control the 45-minute break, even if the break is flexibly divided into differently modulated parts, as we propose.

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