

# **Implementing regulations for road hauliers in Liguria**

2022-2023 lump-sum refunds

November 2023

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## 1. BACKGROUND

1. On 14 October 2021, ASPI and the Ministry of Infrastructure and Transport signed a deed (hereinafter the “Agreement with the MIT”) concluding the dispute procedure for alleged serious breach lodged on 16 August 2018. Article 3, letter e) of the Agreement provides for the application of “partial exemption to users, on the entire concessionary network, to partially compensate traffic disruptions caused by the extraordinary inspections or interventions on the network. This measure is expected to imply an outlay of EUR 250 million between 2020-2025, of which EUR 180 million for inconveniences in the Liguria region alone”. The Agreement with the MIT was registered on 19 April 2022, at the Provincial Directorate I of Rome, Regional Office of Rome 2 - Aurelio (TJP), with protocol no. 191331/2022.
2. On 13 June 2023 Autostrade per l'Italia, the Municipality of Genoa, the Port Authority of the Western Ligurian Sea, the Liguria Region and the Road Hauliers' Associations signed a Memorandum of Understanding concerning the recognition of compensation to the road hauliers' category under the Agreement with the MIT referred to in point 1 above, requiring ASPI to disburse sums (totalling EUR 70 million) to be paid to road hauliers for the use of the motorway infrastructure. The sums allocated for this purpose amount to EUR 35+ million for 2022 and EUR 35 million for 2023. Moreover, any residual sums deriving from the cash-back initiative, estimated in accordance with the procedures set forth in Article 3 of the Memorandum of Understanding referred to in point 2 of the Foreword, may be again allocated for compensation purposes for 2024.
3. The Memorandum of Understanding defined the competence of the refunds to road hauliers who have completed “business trips” within the limit of two trips/day for each vehicle, with motorway transits involving specific motorway stations (A10/A26/A12/A7). Hauliers are required to fill in an application accompanied by information certifying the trip and a self-certification attesting to the truthfulness of the information provided.
4. Upon completion of the preliminary investigation and validation of the motorway journeys eligible for refund (based upon the information declared pursuant to Presidential Decree 445/2000 by the haulage companies), ASPI will proceed with the refund, as per point 3, to each company for an amount equal to the ratio between the total annual sum allocated to the initiative (net of initiative-management costs) and the number of business trips, as identified above, eligible for refund.
5. The Memorandum of Understanding constitutes the definition of a framework agreement for the structuring of the initiative, requiring, in order to be effective, the precise definition of an implementation procedure to punctually define the times and procedures for the identification of the eligible beneficiaries, the provision of the information required, the method of processing, calculation and control of the information disclosed to ASPI by the individual hauliers with the support of the entities qualified to obtain mandate to operate in the name and on behalf of haulage companies (hereinafter: Qualified Entities) indicated by the Italian hauliers' associations representing the category.
6. The Road Hauliers' Associations that have signed the Memorandum of Understanding and ASPI set up a round table to arrange the activities necessary to make the compensation provided for in the Memorandum of Understanding payable. This round table allowed verifying that the implementation of the Memorandum of Understanding involves a gross amount paid for tolls that, in 2022, has generated heavy vehicle-related toll proceeds (net of VAT) significantly higher than the measure established for the disbursement of sums payable to eligible hauliers amounting to EUR 35 million to be granted as compensation. The projection of toll proceeds (net of VAT) for 2023 until the end of September confirms the same estimates.
7. Whereas:
  - the implementation of the Memorandum of Understanding fulfils the provisions of Article 3, letter e) of the Agreement with MIT proposing a “partial exemption for users”, since users are granted a lower amount than ASPI's total turnover for tolls collected in relation to the toll classes falling within the scope of the initiative (B, 30, 40, 50) and in relation to transits departing from/bound for the motorway stations involved in the initiative;

- for the purpose of accurately verifying compliance with the principle of partial toll refund, the analyses carried out revealed a significant amount of information to be managed to implement the measure (for 2022 alone, more than 10 million transits have been recorded, potentially corresponding to as many business trips), with significant impacts in terms of complexity and time needed to proceed with refunds;

In order to facilitate and speed up the whole procedure, the benefit will be paid as a lump-sum refund, rather than a customised refund, to all the eligible beneficiaries, within the limits of the provisions under the Memorandum of Understanding to be submitted for registration, also in accordance with the provisions of these Implementing Regulations.

The financial burden underpinning the initiative constitutes an activity supporting the management of the application for refund and will therefore be drawn from the amounts provided for in the Memorandum of Understanding.

8. On 22 November 2023, ASPI sent a communication to the Liguria Region, the Municipality of Genoa, the Western Ligurian Sea Port Authority and the Ministry of Infrastructure and Transport Directorate General for the supervision of motorway concessionaires in order to share, depending on the results of the Round Table with the Hauliers' Associations, the interpretation of the provisions under the Memorandum of Understanding of June 2023 in order to obtain a mandate for ASPI, and to the Hauliers' Associations signatories to the Memorandum of Understanding in order to define and sign the Implementing Regulations to be developed in compliance with the minimum requirements defined in the aforementioned note.
9. Therefore, these Implementing Rules define, based on the above-mentioned reference framework, the procedures to be adopted for the management of lump-sum refund applications, establishing deadlines, methods, tools and responsibilities within the whole process.
10. A copy of these Implementing Regulations will be submitted to the MIT, the Liguria Region, the Municipality of Genoa and the Western Ligurian Sea Port Authority.

## 1.1 BENEFICIARIES

Eligible for lump-sum reimbursement are companies registered in the National Register of Road Haulage on behalf of third parties during the application period (pursuant to Art. 40 of Law 298/1974) O NER (EC) 1071/2009 and 1072/2009.

Companies no longer registered in the register of companies and, therefore, not holding a valid tax number at the time the benefit is paid, will not be eligible for the lump-sum refund.

With regard to the reference scope, given the impact of motorway work sites on overall traffic flows and the impacts on logistics, in terms of managing peaks and queues, in order for the business trip to be eligible for lump-sum refund, it must have involved transit at toll booths on the motorway network under ASPI's jurisdiction (A10, A26, A12, A7) in the Liguria region.

More specifically, the transit must have registered at least one entry or exit within the scheme presented below:



## 1.2 SUBMISSION OF APPLICATIONS

As detailed below, at the end of the registration phase, applications for lump-sum refund are submitted to ASPI by the beneficiary companies or qualified entities by uploading special forms into the system containing:

- general data of vehicles and tolling devices;
- the list of business trips and references to the documentation certifying the business trip information (O/D) and the actual completion of the business trip.

For business trips without a tolling device, the user is required to attach documentation proving payment for the transit.

The legal representative of the haulage company registering on the platform set up by ASPI to manage the identification of the Business Trips eligible for refund regulated by this procedure shall be informed and expressly accept, upon registration, to take responsibility pursuant to Presidential Decree 445/2000, on the fact that the information and documentation submitted (also during checks) are provided by the same legal representatives with a self-drafted affidavit and confirmed in full awareness of the criminal consequences in the event of false declarations.

Applications may be submitted directly by the individual company or through a qualified entity.

The legal representative of the company wishing to proceed through a qualified entity, by indicating the name on the platform set up by Autostrade per l'Italia, grants the qualified entity the power to act on its behalf to verify the business trips and the associated motorway transits as well as the supply of the supporting documentation, through a specific option available in the platform following registration.

As a result, the qualified entity shall, in the name and on behalf of the delegating party, provide a self-drafted affidavit regarding the matching between motorway journeys and business trips and any other information and documents provided on the platform in order to access the benefits provided for and regulated by these Implementing Regulations.

In this case, the legal representative of the haulage company shall take full and exclusive responsibility for the completeness and truthfulness of the documentation uploaded into the system as proof of the relationship between the individual motorway transits and the related business trips reported as well as the actual operation of the business trips themselves even in the case of delegation conferred on the qualified entity.

The applicant shall guarantee to keep the documentation (paper or digital version) needed to respond to any possible requests for random or specific verifications on the business trips reported, within the legal terms.

### **1.3 QUALIFIED ENTITIES**

The qualified entities listed below and pre-loaded in the system are indicated by the haulage associations accredited with the National Register of Road Haulage on behalf of third parties and signatories to the Memorandum of Understanding, which assessed their experience and activities in the sector in order to provide comprehensive and effective assistance to road haulage companies.

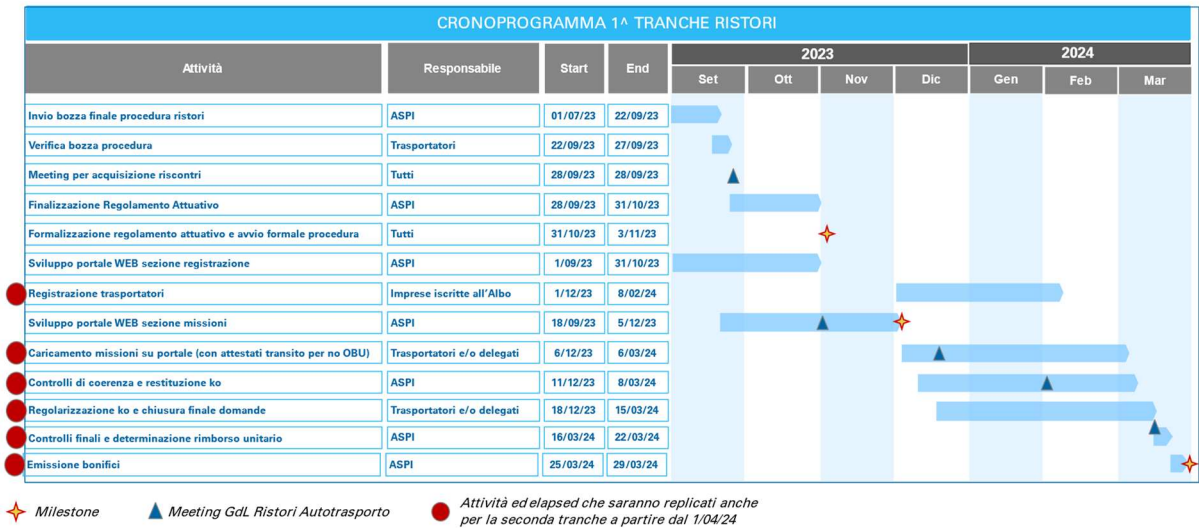
It is understood that ASPI and the other signatories to the Memorandum of Understanding shall be and remain qualified as third parties in the relationship between the haulage company and any qualified entity selected by them to be supported in the compilation and management of the applications for the benefits provided for by these Implementing Regulations.

The qualified entities listed below may be revised (added/changed/deleted) every year based upon the relevant indications provided by the transport associations

Company name	Address	City	ZIP code	Province initials	Country	Tax Code	VAT NO.
CNA SERVIZI GENOVA S.C.ar.l.	VIA SAN VINCENZO 2	GENOA	16121	GE	IT	03433700105	03433700105
FIAP SERVICE S.R.L. SOCIETA' BENEFIT	VIA DELLA CROCE ROSSA,42	PADUA	35129	PADUA	IT	04064650403	04064650403
TRASPORTOUNITO SERVICE	VIA SAMPIERDARENA 6B r	GENOA	16149	GENOA	IT	01924070996	01924070996
UNONE SERVIZI SRL	VIA DOBERDO', 16	MILAN	20126	MI	IT	11059990157	11059990157
FAI INNOVAZIONE SRL	VIA SCARSELLINI 131-49	GENOA	16149	GE	IT	02288440999	02288440999
ANITA Business Srl Unipersonale	Via Oglio, 9	ROME	00198	RM	IT	00291860336	00865321004
CONFARTIGIANATO IMPERI	P.ZZA DE AMICIS 18	IMPERIA		IM	IT	80000650087	01094110085
R.P. SERVIZI INTEGRATI S.r.l.	Via Cappello Vecchio 15	SALERNO	84131	SA	IT	09835351Z 15	09835351215
FAI PARMA SERVIZI SRL	VIA ABBEVERATOIA 63A	PARMA	43126	PI	IT	2786130340	2786130340
Transport & Learning Ltd.	Via dello Statuto, 24	LATINA	04100	LT	IT	02653170593	02653170593
GLOBAL	VIAA.CANTORE 17/1A	GENOA	16149	GE	IT	2346910991	2346910991
AITRAS SERVICE SOC. COOP, CONS.	VIA CIUDICE LIVATINO SNC	CAMPOBELLO DI LICATA	92023	AG	IT	02424970842	02424970842
Progefal sc	Via San Luigi 7	Orbassano (TO)	10043	TO	IT	5515730017	5515730017
Sinergie & Servizi Umbria srl	Via della Segale 29	Perugia	06135	PG	IT	03285570549	03285570549
ASSFORM VENETO	VIA FRATELLI BANDIERA 106	VENEZIA MARGHERA	30175	VE	IT	02888510274	02888510274
ASEA SERVIZI SRL UNIPERSONALE	VIALE AGUGGIARI 8	VARESE	21100	VARESE	IT	01723940J26	01723940126
COOPERATIVA SERVIZI FAI S.C.AR.L.	VIA DELLA VOLTA 84/D	BRESCIA	25124	BS	IT	3276300179	3276300179
C.T.S. - SOCIETA' COOPERATIVA	152 VIA SAN GIOVANNI IN LATERANO	ROME	00184	RM	IT	02245550429	02243550429

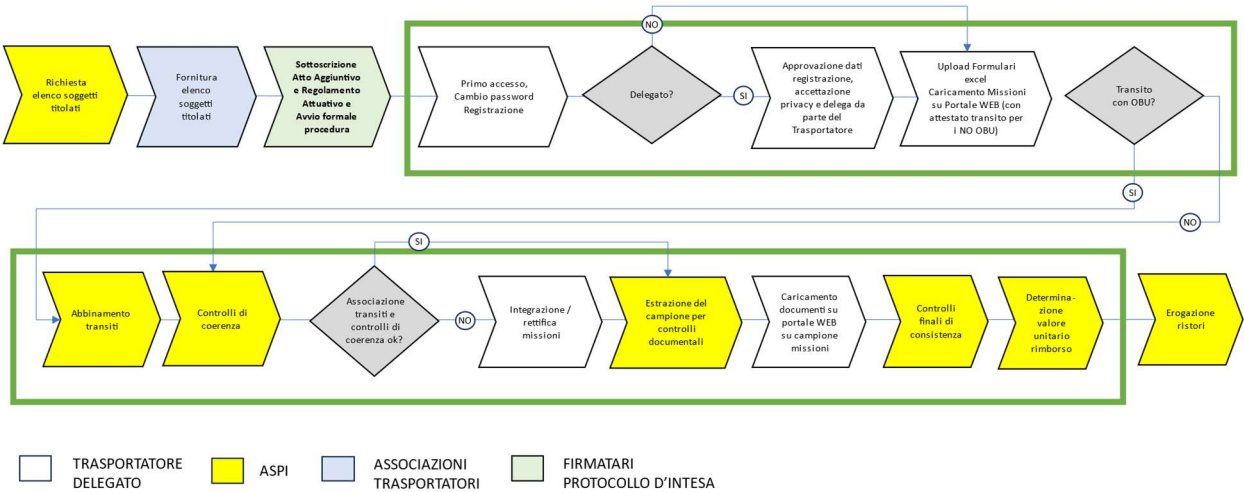
## 2. TIME SCHEDULE

CRONOPROGRAMMA



3. PROCESS FLOW

FIGURE 1 FLOW CHART OF THE LUMP-SUM REFUND PROCEDURE





## FOREWORD

The entities below can register and access the web portal:

- ✓ Legal representative or operator of a qualified entity;
- ✓ Legal representative or operator of an individual haulage company.

Notwithstanding the above, the registration of the company or qualified entity may only be made by the legal representative at the time of first access.

The user (operator or legal representative) may retrieve the password or change it at any time.

### Consistency checks:

- Each user is always individual and may only be associated with ONE qualified entity or haulage company;
- Each qualified entity or company may have several users.

For each haulage company, users shall manage the following sections:

- ✓ Company Data;
- ✓ Company Status;
- ✓ Payment Data;
- ✓ Data of the Register of Road Haulage on behalf of third parties (including date of termination, if any);
- ✓ N.E.R. data (including date of termination, if any);
- ✓ Legal representative;
- ✓ Representative of the procedure/curators.

After successful registration:

- the actual registration in the Register of Road Hauliers or in the NER will be verified by ASPI by querying the reference databases;
- the data of the legal representative will be checked through accurate queries in the Chambers of Commerce database.

At its own convenience, a haulage company may delegate a qualified entity by selecting it from among the service companies identified by the hauliers' associations.

**Consortia:** A consortium operating transports through its members (with a transport document showing the consortium and its member) regardless of who pays for the transits, submits the application for lump-sum refund directly, i.e. in the name and on behalf of all members, without the need to indicate VAT or other details of those members.

Failure to indicate the mandatory personal and payment information will prevent access to the “Application Management” section.

**Consistency checks:**

- ✓ The data used for registration on the Register of Road Hauliers or the NER will be certified by means of queries of the reference databases.  
Any error messages (e.g. registration number not found, registration number belonging to a different tax code/VAT number) will have to be resolved; failure to do so, will cause the application to be rejected.
- ✓ The date of registration on the Register of Road Hauliers or NER must be prior to the date of the first business trip subject to lump-sum refund and, if reported, the date of termination must be after the last business trip date. Any business trips outside this range will generate a “KO” and will be rejected.
- ✓ The data of the legal representative will be checked through accurate Chambers of Commerce database queries; any error messages (e.g. incorrect tax code ...) will have to be resolved; failure to do so, will cause the application to be rejected.

### 3.1 REGISTRATION OF QUALIFIED ENTITIES

Qualified entities will be pre-registered in the system upon indication of the transport associations accredited to the National Register of Road Haulage on behalf of third parties and signatories to the Memorandum of Understanding. However, in order for them to operate on behalf of delegating haulage companies, they must first register in the system in accordance with the procedures set out below.

- Registration of the legal representative:
  - Following accreditation of the qualified entity, the legal representative will receive an e-mail containing the link for registration, then
  - Enters his/her data (First Name, Last Name, e-mail)
  - Enters the tax code of the qualified entity
  - Accepts the privacy notice and the terms of use
  - The system compares the data with the pre-loaded data and sends an e-mail (to the address previously entered) with the OTP code required to complete the registration procedure (to be entered in a special confirmation window)
  - Upon entering the OTP, the legal representative will receive an e-mail to confirm the registration and activate the user
  - Chooses and confirms a password
- Registration of the operator
  - The legal representative enters the section of his/her company data, then:
  - Enters the operator among his/her contacts, specifying first name, last name, e-mail
  - The operator receives an e-mail containing the registration link
  - The operator enters his/her data (first name, last name, e-mail)
  - Enters the tax code of the qualified entity
  - Accepts the privacy notice and the terms of use
  - The system sends an e-mail (to the address previously entered) with the OTP code required to complete the registration procedure
  - Upon entering the OTP, he/she will receive an e-mail to confirm the registration and activate the user
  - Chooses and confirms a password
  - From now on, the operator can view and select the list of haulage companies that have delegated the qualified entity.

### 3.2 REGISTRATION OF THE HAULAGE COMPANY

A haulage company may be registered:

- directly, by the individual company;
- through a mediated procedure, i.e. through the intermediary of a qualified entity. In this case, the company registered by the qualified entity must confirm the registration data entered on its behalf by the qualified entity, accept the mandate to the latter for the uploading of business trips, as well as the terms and conditions (privacy notice, etc.).

### 3.2.1 DIRECT REGISTRATION BY THE INDIVIDUAL HAULAGE COMPANY

- Registration of the legal representative
  - The Legal Representative enters the registration portal, then
  - Selects user type (Haulage company - Legal representative)
  - Enters his/her data (first name, last name, e-mail)
  - Enters the haulage company data (company name, tax code)
  - Accepts the privacy notice and the terms of use
  - The system sends an e-mail (to the address previously entered) with the OTP code required to complete the registration procedure
  - Upon entering the OTP, the legal representative will receive an e-mail to confirm the registration and activate the user.
  - Chooses and confirms a password
  - From now on, the legal representative can:
    - ☐ complete the company data entry
    - ☐ enter vehicle and OBUs data
    - ☐ manage forms and business trips
- Registration of the operator
  - The legal representative enters his/her company data
  - Enters the operator among his/her contacts by specifying first name, last name, e-mail
  - The operator receives an e-mail containing the registration link
  - The operator enters his/her data (first name, last name, e-mail)
  - Enters the haulage company data (company name, tax code)
  - Accepts the privacy notice and the terms of use
  - The system sends an e-mail (to the address previously entered) with the OTP code required to complete the registration procedure
  - Upon entering the OTP, the operator will receive an e-mail to confirm the registration and activate the user.
  - Chooses and confirms a password
  - From now on, the operator can:
    - ☐ enter vehicle and OBUs data
    - ☐ manage forms and business trips

### 3.2.2 REGISTRATION OF THE HAULAGE COMPANY THROUGH THE QUALIFIED ENTITY

As outlined above, as an alternative to direct registration, haulage companies may be registered on their behalf by the qualified entities, it being understood that such registration must be confirmed by the individual haulage companies through the procedure outlined below.

Haulage companies may also be registered by qualified entities through the so-called “bulk upload”, i.e. by uploading to the portal the registration data of each company, pre-loaded on a special excel form.

In the latter case, the information can be entered in an Excel file according to the template *imprese\_autotrasporto\_v1.03* (summarised below) and sent to the Autostrade per l'Italia e-mail: [supporto-rimborsi-liguri@autostrade.it](mailto:supporto-rimborsi-liguri@autostrade.it)

Once the file has been processed, the System will reply to the e-mail received, informing of the positive outcome or detailing the reasons for any rejection.

Below are the fields to be filled in for registration.

<b>Group</b>	<b>Field</b>	<b>Mandatory</b>	<b>Formal checks</b>
	<i>Tax code of the person delegated to act in the name and on behalf of the user</i>	Yes	
Company data	Nationality	Yes	Valid country code - ISO Code (2 letters)
	Company name	Yes	
	Address	Yes	
	City	Yes	
	ZIP code	No	Mandatory if nationality = IT
	Province two-letter code	No	Mandatory if nationality = IT Valid province two-letter code - ISO code (2 letters)
	Tax code	Yes	
	VAT No.	Yes	
	Phone/cell phone	No	
	Ordinary Electronic Mail Address	No	E-mail format Mandatory if nationality other than IT
	Certified E-mail address	No	E-mail format Mandatory if nationality = IT
Payment data	IBAN	Yes	IBAN active and in the company's name
	SWIFT	Yes	
National Register of Road Haulage on behalf of third parties	Registration no.	No	Format AA9999999A Mandatory if nationality = IT
	Date of registration	No	Date format Mandatory if nationality = IT
	Termination date	No	Date format
N.E.R.	Registration no.	No	Mandatory if nationality <> IT

Group	Field	Mandatory	Formal checks
	Registration date	No	Date format Mandatory if nationality <> IT
	Termination date	No	Date format
Legal representative	Nationality	NO	
	Last name	Yes	
	First name	Yes	
	Tax code	Yes	
	Mobile No.	Yes	
	E-mail	Yes	E-mail format
	Company status	Yes	Allowed values: IN OPERATION, IN BANKRUPTCY, SUBJECT TO INSOLVENCY PROCEEDINGS OR ACQUIRING COMPANY OR BUSINESS UNIT LEASEHOLDER
	Tax Code of the company subject to incorporation or lease	No	Mandatory if company with status: ACQUIRING COMPANY BUSINESS UNIT LEASEHOLDER
	Date of insolvency proceedings or bankruptcy, incorporation or commencement of business unit leasing	No	Date format Mandatory if company status: IN BANKRUPTCY SUBJECT TO INSOLVENCY PROCEEDINGS ACQUIRING COMPANY BUSINESS UNIT LEASEHOLDER
Representative of the procedure/curators	Nationality	No	As per country list
	Surname	No	Mandatory if company with status: IN BANKRUPTCY SUBJECT TO INSOLVENCY PROCEEDINGS
	Name	No	Mandatory if company with status: IN BANKRUPTCY SUBJECT TO INSOLVENCY PROCEEDINGS
	Mobile No.	No	Mandatory if company with status: IN BANKRUPTCY OR SUBJECT TO INSOLVENCY PROCEEDINGS
	E-mail	No	Mandatory if company with status: IN BANKRUPTCY SUBJECT TO INSOLVENCY PROCEEDINGS
	PEC (registered mail)	No	Mandatory if company status: IN BANKRUPTCY SUBJECT TO INSOLVENCY PROCEEDINGS
Payment data	IBAN (*) of the insolvency proceedings	No	Mandatory if company with status: IN BANKRUPTCY SUBJECT TO INSOLVENCY PROCEEDINGS
	SWIFT (*) of the insolvency proceedings	No	Mandatory if company with status: IN BANKRUPTCY SUBJECT TO INSOLVENCY PROCEEDINGS

The successful processing of the file enables the automatic creation and compilation of all company data and the sending of an e-mail to the legal representative of each delegating haulage company containing an invitation to register on the portal and to confirm the mandate.

**Automatic consistency checks on bulk import of company data with qualified entity:**

- ✓ Companies with missing or incorrect mandatory data are reported by the system and disregarded.
- ✓ A company may only delegate one qualified entity; if the tax code of a company has already been registered by another person, the system generates a KO and discards the record.

**3.3 ACCEPTANCE OF THE REGISTRATION MADE BY THE QUALIFIED ENTITY**

Following bulk/individual registration by the qualified entity on behalf of haulage companies, the legal representatives of such companies will receive an e-mail containing a link to accept the registration. Legal representatives pre-registered by a qualified entity must complete the registration process within 30 days from the receipt of the e-mail inviting them to register.

The registration can be accepted by clicking on the link, where the legal representative:

- Enters his/her data (first name, last name, e-mail)
- Enters company name and tax code of his/her haulage company
- Accepts the privacy note and the terms of use
- The system will compare the data with the pre-loaded data and sends an e-mail (to the address previously entered) with the OTP code required to complete the registration procedure (to be entered in a special confirmation window)
- Upon entering the OTP, the legal representative will receive e-mail to confirm the registration and activate the user
- Chooses and confirms a password
- From now on, the legal representative of the haulage company can view its pre-loaded data
- The legal representative of the qualified entity is notified of the successful registration and can start handling forms and business trips

Until successful validation of the application, the haulage company may not view the business trips, which will be managed directly by the qualified entity.

**3.4 LOADING BUSINESS TRIPS**

To claim the lump-sum refund, the individual company (or the qualified entity) shall fill in an application divided into the following sections:

- Vehicle-device general data
- Business Trip Form with Tolling Device (C1)
- Business Trip Form without Tolling Device (C2)
- Exceptional transport trip form (C3)

Data can be handled manually from the web portal or acquired in bulk by filling in special forms in Excel format.

Depending on its approval stage, each application may be classified in different ways (in progress, completed, etc.).

Qualified entities may view the list and status of their applications and select the company they want to operate on.

### 3.4.1 VEHICLE-DEVICE GENERAL DATA

For each vehicle in its fleet, each company may indicate, for a shorter or longer period of time, the device used on motorway sections.

Matches can be acquired in bulk by filling in Excel forms containing the following information:

- **Tractor plate**, mandatory, alphanumeric format
- **Nationality**, mandatory, text
- **Provider**, mandatory, one of the possible values listed (Telepass, DKV, UnipolTech, AXXES, TOLLTICKETS)
- **Device type**, mandatory
- **Device No. (PAN NUMRER)**, mandatory  
Format:
  - If Telepass: 6 to 10 digits. If longer than 10, the first 10 digits from the right will be considered
  - If provider other than Telepass: 20 alphanumeric characters
- **From (date)**, optional, dd/mm/yyyy format
- **To (date)**, optional, dd/mm/yyyy format

#### Automatic consistency checks on vehicle-device data:

- ✓ If entered, the date must fall within the application period
- ✓ The end date may not be prior to the start date
- ✓ A vehicle may only be associated with one device in the same period

### 3.4.2 BUSINESS TRIP FORMS

The input of business trip data differs depending on whether the trip was made with or without a tolling device or with exceptional transport.

Each company must always provide a list of the business trips eligible for lump-sum refund and documentary references showing the details of the trip (O/D) and its actual completion.

When uploading business trips, the following general rules must be complied with:



- Business trips **with no goods being transported (unloaded)** may NOT be eligible for lump-sum refund; transport of empty containers and for “ship loading/unloading” business trips, transport of swap bodies or empty semi-trailers shall be considered eligible.
- **A business trip with multiple entries and exits** shall be entitled to only one lump-sum refund and must therefore only be entered once.

For each business trip without device, the operator is also required to attach the documentation proving payment for the transit (e.g. toll receipt).

Business trip data can be collected in bulk, by filling in one or both of the following templates (in Excel format):

- Form C1: for business trips with vehicles equipped with a tolling device (version 1.05 or 1.01)
- Form C2: for business trips with vehicles not equipped with a tolling device
- Form C3: for business trips with exceptional transport

Business trip data are structured in macro-sections:

- General data
- Unique reference number of the Document certifying the business trip
- Unique reference number of the Document proving actual business trip completion
- Transit on Liguria motorways (ASPI) with a vehicle not equipped with a tolling device (Form C2 only)

#### **Section: General Data**

- ***Business trip identifier***; mandatory, sequential number  
***Transport type***; mandatory, text. (not available in form C3)  
Can be classified as:
  - Semitrailer
  - Container
  - Freight
  - Miscellaneous goods
  - Ship loading/unloading
- ***Authorisation for exceptional transport***; mandatory, text. (Form C3 only)  
Can be classified as:
  - Single
  - Multiple
  - Periodic
- ***Exceptional transport authorisation number***, mandatory, alphanumeric text. (Form C3 only)
- ***Authorisation date***, mandatory dd/mm/yyyy. (Form C3 only)
- ***Container initials***: Alphanumeric text (without spaces or separator characters)  
If a vehicle is transporting two or more containers from the same place of departure to the same destination, it must indicate one of the container initials.

Recommended if the Transport Type is set to "Container".

- **Municipality of Departure**, mandatory, text to be chosen as per "List of municipalities" sheet.
- **Municipality of Destination**, mandatory, text to be chosen as per "List of municipalities" sheet.
- **Vehicle number plate**, alphanumeric text (no spaces or separator characters), Mandatory
- **Semi-trailer number plate**, alphanumeric text (not available in Form C3)

Recommended where the vehicle number plate is not shown in the documents

#### **Section: Device (for Form C1 only)**

- **Provider**, free text as per "Provider" sheet  
Mandatory, if the vehicle is not equipped with a tolling device registered in the vehicle-device register or has temporarily used a different device
- **Device type**, free text as per "Device type" sheet  
Mandatory, if the vehicle is not equipped with a tolling device registered in the vehicle-device register or has temporarily used a different device
- **Device no. (pan number)**, text  
Mandatory, if the vehicle is not equipped with a tolling device registered in the vehicle-device register or has temporarily used a different device  
Format:
  - If Telepass: 6 to 10 digits. If longer than 10, the first 10 digits from the right will be considered
  - If provider other than Telepass: 20 alphanumeric characters

#### **Section: Document certifying the business trip**

- **Document type**, mandatory, text to be chosen as per "document type" sheet where Business trip verified = YES
- **Document date**, mandatory, dd/mm/yyyy
- **Document number**, alphanumeric text  
Mandatory if the type of document chosen shows Mandatory document number = Yes

#### **Section: Document of actual completion of the business trip**

- **Actual completion date (loading/unloading)**, mandatory, dd/mm/yyyy.  
The date on which the business trip was completed
- **Document type 1**, mandatory, text to be chosen as per "document type" sheet where Business trip completed = YES
- **Document number 1**, alphanumeric text  
Mandatory if the type of document chosen shows Mandatory document number = Yes
- **Document type 2**, optional free text as per "document type" sheet where Business trip completed = YES
- **Document number 2**, alphanumeric text  
Mandatory if the type of document chosen shows Mandatory document number = Yes and the Document type 2 field is filled in
- **Document type 3**, optional free text as per "document type" sheet where Business trip completed= YES
- **Document number 3**, alphanumeric text  
Mandatory if the type of document chosen shows Mandatory document number = Yes and the Document type 3 field is filled in

*Note: More than one document may be declared for each business trip*

**Section: (for Form C2 only)**

- **Payment Document Type**, Mandatory, text;  
Can be classified as:
  - Transit payment receipt
  - Invoice upon payment
  - Pre-paid Viacard
- Pre-paid Viacard **Document number**, alphanumeric. Recommended if Payment Document Type shows "Motorway Transit Receipt"
- **Entry/exit toll booth**, mandatory.  
free text as per the "Caselli Liguria Aspi" sheet.

**"Document type" table (used to manage business trip documents)**

Document type	BUSINESS TRIP CERTIFICATION	BUSINESS TRIP COMPLETION	MANDATORY DOC. NO.
Acceptance certificate	YES	YES	YES
Delivery note for products subject to excise duty	YES	YES	YES
Delivery note	YES	YES	YES
Dispatch note	YES	YES	YES
Shipping receipt	YES	YES	YES
CMR ( <i>Convention des Marchandises par Route</i> ) – Convention on the Contract for International Carriage of Goods by Road	YES	YES	NO
Contract of carriage	YES	YES	YES
Administrative Accompanying Document	YES	YES	YES
Simplified Accompanying Document	YES	YES	YES
Delivery order	NO	YES	YES
Transport document	YES	YES	YES
Electronic transport document	YES	YES	YES
Transport document for Waste of Electric and Electronic equipment	YES	YES	YES
Supplier's invoice	YES	YES	YES
Customer's invoice	YES	YES	YES
Estimate of expense	YES	YES	NO
Journey form	YES	YES	NO
Waste identification form/ Acceptance certificate	YES	YES	YES
Logbook	YES	YES	YES
Interchange	NO	YES	NO
Waybill	YES	YES	NO
Load list	YES	YES	YES
Acceptance report	YES	YES	YES
Weight list	YES	YES	NO
Transport order	YES	YES	NO

Service order	YES	YES	YES
Packing list	YES	YES	YES
Bill of Lading	YES	YES	YES
Master's receipt	YES	YES	NO
Daily summary	YES	YES	NO
Transport data sheet	YES	YES	YES
VGM	NO	YES	YES

*Note. While managing the implementation of the memorandum of understanding, the parties may consider supplementing the types of the aforementioned documents in order to certify the actual completion of the business trip*

#### **Automatic consistency checks upon acquisition of Excel forms:**

Should one or more of the following checks fail, the system will generate a KO and the business trip data uploaded will have to be supplemented/amended accordingly.

- ✓ Compilation of all mandatory fields
- ✓ One between Municipality of departure or Municipality of destination for each business trip must be included in the "Municipality List" sheet (containing the municipalities of Savona and Genoa) and different from ALTRO
- ✓ Business trip date consistent with application year
- ✓ Business trip under form C1 with vehicle equipped with tolling device (either directly or through [NON CHIARO])
- ✓ No duplicate values (same data in different rows):
  - Form C1: *business trip identification number*
  - Form C2:
    - *payment document type, payment document no., entry/exit tollbooth*
    - *business trip identification number*
  - ✓ Form C3:
    - *individual authorisation type, authorisation no.*
    - *business trip identification no.*

### **3.5 MATCHING OF TRANSITS**

For each business trip **with a tolling device** there will be the matching with a compatible motorway transit, using the device associated with the business trip and the trip data themselves (e.g. date, departure, destination, etc.) as the association key. This association will be proposed to the haulage company to which the specific trip refers, or delegated party, for its validation.

Likewise, for each business trip with **exceptional transport**, the matching with the relevant motorway transit will be proposed, using the exceptional transport authorisation number indicated when uploading the business trip.

For each business trip **with no tolling device**, the transit data (complete with proof of payment) must be entered by the haulier or qualified entity when uploading the application.

Business trips with tolling device or with exceptional transport to which a transit has been successfully associated will be marked with an OK and may be validated by the user.

Business trips with a tolling device or exceptional transport to which a transit could NOT be associated will generate a KO and will be returned to the haulier or qualified entity for the appropriate corrections/additions.

Business trips without a tolling device and without a payment receipt will generate a KO and will have to be supplemented by the haulier or qualified entity.

### 3.6 CONSISTENCY CHECKS

- ✓ The matching of business trips with motorway transit must comply with the following conditions:
  - If the journey originates in the area covered by the lump-sum refund:
    - the entry toll booth must be one of the 21 toll booths of the motorway network under ASPI's jurisdiction (A10, A26, A12, A7) in the Liguria region.
    - the date of entry on the motorway network must be -3days +3 days from the date of completion of the business trip
  - if the journey is bound to the area covered by the lump-sum refund:
    - the exit toll booth must be one of the 21 toll booths on the motorway network under ASPI's jurisdiction (A10, A26, A12, A7) in the Liguria region.
    - The date of exit from the motorway network must be -3 days +3 days from the date of completion of the business trip

*Note. Transits to be matched with business trips will be searched starting with those closest to the business trip completion date; the check is extended to all the days in the range defined, regardless of the reason for non-matching (transit not found, exceeding the limit of 2 eligible business trips) in order to minimise the number of rejected applications.*

All business trips (with/without tolling device, exceptional transport) not compliant with the above conditions will be marked with a KO and returned to the haulier or qualified entity for any corrections/additions or to cancel the business trip.

- ✓ A **motorway transit** may only be matched with one business trip; in the case of business trips without a tolling device, any duplicate declarations will be discarded, while in the case of automatic matching, the transit matched with a business trip will be excluded from further processing
- ✓ A **vehicle** may not have more than 2 business trips (with/without device/exceptional transport) matched per transit day; excess business trips will generate a KO and will be discarded
- ✓ A maximum of **4 business trips** with the same completion date may be entered for each vehicle; excess business trips will generate a KO and will be discarded

All business trips marked with a specific outcome (OK/KO) and possible reasons for rejection may be

filtered and/or exported to Excel/CSV files.

### **3.7 SUPPLEMENTATION / CORRECTION OF BUSINESS TRIPS**

The user may select all or some business trips marked as OK and validate them.

Business trips marked as KO can be corrected, re-processed by the transit matching procedure and, if they are found to be OK, validated.

Business trips not validated or marked as KO will not be eligible for lump-sum refund.

A printout (or extraction to an Excel file) of a company's business trips may be requested at any time, broken down by:

- ✓ Business trips marked as OK, validated
- ✓ Business trips marked as OK, to be validated
- ✓ Business trips marked as KO with justification

Below are the main reasons for rejection:

- motorway transit not found
- transit not made at one of the 21 toll booths of the ASPI network covered by in the initiative
- failure to comply with the requirement defining date of exit/entry from the motorway network -3 days +3 days from the date of completion of the business trip
- exceptional transport authorisation number not found
- limit of (2) eligible business trips per vehicle and transit date exceeded
- limit of (4) eligible business trips per vehicle and business trip date exceeded
- failure to provide the documentation proving payment of transit for business trips without a tolling device
- failed transit certificate verification

### **3.8 CLOSING AND SIGNING APPLICATIONS**

Once the business trips have been successfully entered and validated through the consistency checks, the legal representative of the qualified entity or, if unavailable, of the haulage company:

- closes the application (cannot be changed from now on)
- signs the self-certification document containing the list of validated business trips

### 3.9 RETENTION OF SUPPORTING DOCUMENTS FOR BUSINESS TRIPS

The owner of the haulage company and/or the haulage company consortium that registers on the platform to apply for the lump-sum refund for motorway transits during business trips pursuant to the preceding points of these Regulations, hereby undertake to retain, for any future checks by the parties required to do so by law and/or the Regulations, all the documents subject to declaration certifying:

- i. the business trip
- ii. the actual completion of the business trip
- iii. journey made in Liguria (within ASPI's jurisdiction) without tolling device

This commitment shall be undertaken by acknowledging that a declaration pursuant to Presidential Decree No. 445/2000 has been provided, directly or through a qualified entity specifically mandated to act in this regard on its own behalf, to certify the existence and truthfulness of such documentation.

As is known, criminal sanctions provided for in the event of false declarations, false documents and use of false deeds will be imposed in the event of a proven false declaration (Art. 76 of Presidential Decree 445/28.12.2000).

### 3.10 FINAL CHECKS

Upon closing all applications, final consistency checks will be carried out to ensure that there are no outstanding KOs, and the availability of all the information necessary for the determination of the unit value of the lump-sum refund and subsequent payment.

Upon completing the above checks, the number of eligible business trips will be ultimately defined.

### 3.11 CALCULATION OF THE UNIT VALUE OF LUMP-SUM REFUNDS

Based on the provisions of the Memorandum of Understanding dated 13 June 2023 and in order to facilitate and speed up the entire procedure as indicated in point 1.7 of these Implementing Regulations, ASPI will calculate the unit amount of the lump-sum refund by comparing the total amount of the annual allocation, after deduction of all costs borne for handling lump-sum refund applications, including the costs incurred for the registration of the Operating Agreement, divided by the number of eligible business trips.

For “exceptional transport” business trips, a 5x multiplication factor will apply.

The multiplication factor has been defined considering the higher costs incurred for a business trip subject to major constraints.

As a result, the number of eligible business trips consists of:

- Number of valid business trips in form C1
- Number of valid business trips in form C2
- Number of valid business trips x5 in form C3

### 3.12 PAYMENT OF REFUNDS

Payment will be made by bank transfer to the company to which the business trips refer, i.e. the proprietor of the refund application.

The platform will display a document showing the number of eligible business trips and the consequent total value of the lump-sum refund paid on the Iban indicated upon registration.

## REFERENCE DOCUMENTS

**Protocollo d'intesa Autotrasportatori Liguria 13062023.pdf**; *Various Authors*; *Memorandum of Understanding*;  
**ASPI Communication dated 22 November 2023**

## ANNEXES

- **anagrafica-veicoli\_v1.7.xlsx**; Vehicle-Device Matching Template;
- **formulario\_C1\_v1.05.xlsx**; Template for business trips with vehicle-mounted tolling device;
- **formulario\_C2\_v1.05.xlsx**; Template for business trips without a vehicle-mounted tolling device.
- **formulario\_C3\_v1.05.xlsx**; Template for business trips involving exceptional transport.
- **imprese\_autotrasporto\_v1.04**; Template for haulage companies with mandate to qualified entity.

## APPROVALS

These implementing regulations were approved on 30 November 2023 and signed by the representatives of Autostrade per l'Italia and the Road Hauliers' Associations, as listed below.

AUTOSTRADe PER L'ITALIA	FABRIZIO MANCUSO
ALIAI	BOSSA ENRICO
ANITA	ALBERTINI ALESSANDRO
CNA FITA	GENNAI ROBERTO
CONFARTIGIANATO TRASPORTI	MARZO ANTONIO
FAI LIGURIA	TIEZZI GIANFRANCO
FIAP	COLUCCINI ROBERTO
LEGACOOOP	IPPOLITO ISABELLA
TRASPORTOUNITO	TAGNOCHETTI GIUSEPPE