

Brussels 27 March, 2009

### **Our views regarding the future of transport**

The Swedish Association of Road Haulage Companies (SA), which is the trade association of the road haulage freight industry in Sweden, and the Danish Transport and Logistics Association (DTL), which represents Danish freight transport operators in road and rail, are hereby jointly presenting comments on the Future of Transport consultation by the European Commission.

The intention of the Commission to prepare the ground for future policy developments of the common transport policy is welcomed. We agree that the formulation of an effective and sustainable transport policy also requires a proper identification of the drivers determining the demand for and composition of transport operations. In this context we find the report from the Focus Group stimulating and interesting. At the same time however, the report shows a great need for further development of our common understanding of which drivers that determine the demand for transport. Only then will we know if and how we can influence the demand for transport and thus how to achieve transport policy objectives of sustainability, safety and quality.

This need for further understanding emphasizes the need for better data and statistics on the transport flows and transport patterns in the EU. The Commission could consider establishing an agency with the responsibility to carry out transport analysis and research to improve our knowledge in this area.

While the current crisis in the world economy poses challenges for the transport industry in Europe and worldwide, we believe it is important to keep focus also on the longer term development of transport and infrastructure in the EU, to ensure that future growth and employment will take place.

A well functioning infrastructure must be a main goal in the transport policy for the coming years. Investments in new roads and railways are needed, but they will only offer long term solutions, in particular for rail. In the shorter term other more quick solutions are needed to ensure the free flow of traffic and the optimal utilisation of the capacity.

The further use of intelligent transport systems (ITS) in Europe is a contribution to the solution. ITS can improve road safety while at the same time reducing the environmental impact from lorries by ensuring a better use of the existing capacity, reduce congestion, and facilitate information exchange. The initiative taken by the Commission in the area of ITS therefore needs to continue to receive high priority. Focus should be on encouraging investments in existing ITS possibilities ensuring the maximum benefits at the lowest costs, rather than wait for further research and development

An improved capacity utilisation of the existing infrastructure can also be achieved in other ways. The introductions in Europe of the European Modular Concept, adjustments of weight dimensions

and regulations of access restriction to the infrastructure are actions that can have an immediate positive effect and facilitate mobility.

The intense activity in several countries regarding the European modular concept – an activity initiated from the market place by operators, infrastructure managers and shippers – should be recognised by the EU Commission as an attempt to find a practical solution to a practical problem. Furthermore, the modular concept will strengthen the development of terminal based transport and logistic systems, as the modular concept is well suited for transport freight to and from intermodal loading terminals for onward transport by other modes or for distribution in urban areas.

The commission has launched an initiative on greening of transport. The initiative includes a proposal regarding the revision of the eurovignette directive. If the EU is going to internalize the external costs from heavy goods vehicles, then it is important, that there is an alternative to transport of freight by road. In many cases this is not the case because of lacking infrastructure or because of no available capacity for freight by rail.

To charge for external costs under these circumstances is likely to have no effect on the environment. The charging will just pull more money out of the road haulage industry leaving less for investments in greener vehicles etc for the operators. Furthermore it will leave road transport more expensive with negative effects on employment, regional development, differences in location, etc. It is therefore important that greening of transport follows an integrated approach, building on a package of initiatives, but recognising that only together will these initiatives achieve their goal.

A better understanding of the benefits of freight and passenger transport for the European and global economy is also important. In other words, also for greening of transport we need to better understand what can drive the process.

We welcome that urban mobility has become a topic for the EU transport policy. The mobility challenges facing urban areas can only be addressed in an integrated manner, taking account of all types of transport and all types of transport needs. Transport of goods and freight in an urban context includes such varied operations as renovation, construction site transport operations, cranes and other heavy special transport, distribution of fresh goods for food shops etc. All these operations are essential activities to ensure urban living. In an urban context freight transport therefore needs the same attention as passenger transport. We are looking forward to see the Commission's further initiatives in the field of urban transport.

In the Focus Group report it is mentioned, that the EU should have an integrated transport system with integrated networks. In our opinion this is very important. DTL and SA strongly believe that intermodality is a practical solution to a practical problem, namely the growth in transport to, from and within the EU. However that requires optimal efficiency in all transport modes and an integrated transport system. The exercise is thus a matter of optimizing all transport modes, and not just promoting a modal split in favour of rail or inland waterways.

In our view a future transport policy for the EU will be more operational and realistic, if it is based on a willingness from all parties to recognise road transport as a necessary and integrated part of the transport chain with its own need for further development and improved efficiency, sustainability and safety.

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