



Comments to the Communication on the future of European transport policy

30 September 2009

The “Organisations saying yes to EMS” are happy to submit their views to the Future of Transport consultation.

These organisations represent shippers, freight forwarders, transport operators and vehicle manufacturers that are convinced that the modular concept is the right response from the road sector in order to decouple transport from its negative impact on the environment and to improve transport and logistics efficiency.

An overview of these supporting organisations and companies can be found at the EMS website: http://www.modularsystem.eu/en/organisations_saying_yes_to_ems/

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The Communication on the future of European transport policy states that “*the most immediate priorities appear to be the better integration of the different modes of transport as a way to improve the overall efficiency of the system and the acceleration of the development and deployment of innovative technologies*” (cf. para. 38). **The new technology delivered with European Modular System (EMS) is a key factor to make the future European Transport Policy successful. It enables road transport environmental improvement while at the same time supporting logistics efficiency and competitiveness. Furthermore, the wider introduction of EMS in cross-border logistics operations in Europe would help operators and customers alike, optimising the utilisation of trucks and trailers, road infrastructure capacity, and integration with rail, air, inland and short-sea shipping for the door-to-door total logistics solutions.**

The EMS is an innovative concept in the sense that it allows freight operators to work beyond the limitations applicable to other road transport vehicles operating on the road network. The EMS provides the possibility to use longer and potentially heavier vehicles, by combining existing regulated “modules” to be used on a dedicated road network considering local infrastructures and business situations.

The EMS can significantly contribute to achieving the future European Transport Policy’s objectives:

- ***Less fuel consumption and emissions:*** Longer vehicle combinations improve fuel efficiency and **reduce CO₂ per unit of cargo carried**. For that reason, the EMS is an innovative tool that would help the EU and its member states to reach the targets set by the Kyoto Protocol and by the ambitious programmes set in the 20-20-20 declaration. A widespread use of EMS may contribute to absorbing the

growth of demand by containing the overall number of commercial vehicles on the road. Such reduction can amount to savings in emissions of up to 30% per unit payload.

- **Less congestion:** An EU-wide introduction of the EMS would reduce congestion on the European road network and contribute to meet the challenges of future transport growth. It will help to ease congestion in areas where infrastructure extensions or improvements are difficult or impossible to realise. An obvious advantage with the EMS is that these vehicle combinations occupy less road space for carrying the same amount of goods. This contributes significantly to reduced space occupancy (higher road space utilisation), which would be a significant benefit on certain congested parts of the European trunk-road network.

- **Supports intermodal solutions:** By using existing standardized EU modules, compatible with maritime and rail freight transport, unlike many existing articulated road freight vehicles and trailers (designed to maximise carrying capacity within current weight and dimension restrictions), the EMS will support an enhanced interaction with other transport modes. The EMS will therefore have a positive effect on the development of intermodal road-rail transport solutions, short sea shipping and inland waterway transport.

- **Flexible and easy to implement:** The EMS provides sufficient flexibility to enable vehicle and trailer combinations to adapt to different trade situations, volumes and fluctuating demand: it offers the possibility to use long combinations when possible and shorter combinations when necessary. As it is based on existing equipment (vehicles and load units), it is very easy to rearrange to shorter combinations and adapt to local conditions, customers' requirements and timing of delivery.

- **No increased risk of accidents with EMS:** There have been concerns that longer vehicle combinations are less safe than shorter ones. The reality is the exact opposite. Real-life observations have shown that the number of accidents is directly proportionate to the number of vehicles in circulation and there will ultimately be fewer vehicles circulating if EMS was allowed throughout Europe. There is no evidence that EMS vehicle combinations create more accidents than shorter vehicle combinations. On the basis of existing evidence, the introduction of EMS will not result in an increased risk of accidents.

- **No significant shift of freight from rail to road:** Europe needs all modes of transport to be modern and efficient. Thus, the railway industry should not prevent the road industry to develop innovative tools like the EMS. Europe would have reasons to rejoice if the rail industry focussed on its own innovation, rather than trying to impede innovation in other modes. All transport modes should be allowed to improve their efficiency, without unreasonable restrictions. This being said, the wider use of the EMS will certainly promote further development of intermodal road-rail transport. Moreover, there is no evidence that allowing EMS combinations would shift loads from rail to road: road and rail are complementary modes with limited commercial areas of competition. In the countries where the implementation of EMS has a historical perspective, there are no signs of modal shift from rail to road, to the contrary these countries have a higher share of rail freight transport in their modal split than the rest of the EU.

- **No major investment in infrastructure is needed:** EMS combinations are not intended to be used in city centres or other sensitive areas but to serve large terminals from which goods will be delivered by shorter combinations or single vehicles. It must also be noted that in principle the vehicles' weight per axle would either stay the same or decrease, thus resulting in less wear and tear on roads¹.

¹ a 25.25 meter combination with a weight of 60t (2.4 ton/m) is likely to transmit less stress on a bridge than the 16.5 m long tractor and semitrailer combination allowed in combined transport with a weight of 44t (2.7 ton/m).

There is an exciting opportunity for the European Commission to help industry improving its performance and, in line with the European Commission's objective of achieving optimal efficiency in the use of all modes of transport. The EMS is an efficient transport solution that is not only essential for the continuous growth and development of the economy of a competitive Europe, but also one of the most valuable tools to help meet the environmental challenges regarding air quality and global warming, as well as having a positive impact on the curtailment of congestion.

We therefore expect that the new White Paper on European Transport Policy will communicate a positive message regarding the use of EMS in the EU and, in particular, between Member States that already allow these combinations on their territories.

Furthermore we call on the European Commission to encourage EU Member States to organise autonomous experiments/or to launch cross-border trials. We believe that those real-live tests will provide critical elements to assess the impacts of EMS. In this respect, experts and industry representatives who are part of the EMS Forum are willing to support the Commission in any necessary studies and we would be ready to support the Commission in receiving the results of those trials with no delay.