



**THE EUROPEAN COMMUNITY ASSOCIATION OF
SHIP BROKERS AND AGENTS**

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Friday, 18 September 2009

The European Commission
Directorate General for Transport and Energy
BRUSSELS

Dear Sirs,

**EUROPEAN COMMISSION COMMUNICATION ON
“A SUSTAINABLE FUTURE FOR TRANSPORT”**

ECASBA, the European organisation representing the shipbroking and ship agency sectors, thanks the Commission for the opportunity to review this paper and has pleasure in commenting as follows.

It is of course vital that Europe has a safe, efficient, environmentally sound and effective transport network and given the lead time required to effect changes the development of a long-term strategy, that looks not only at the transport industry but also how it impacts on, and interacts with, social issues, environmental protection, sustainable development and other related factors, is of major importance to Europe's ongoing economic development. It is of course of particular interest to our ship agent members who are responsible for coordinating the calls of vessels in European ports and for the efficient movement of goods to and from those ports by all available modes of transport including road, rail and our favoured options, short sea and river transport. The delays and costs that result from an inability to arrange such movements by the best possible means continue on through the rest of the transport chain and are ultimately paid by the European consumer.

This paper certainly covers a very wide range of issues, many of which are outwith the competence of ECASBA, and so in this paper we will restrict our comments to those issues that are of relevance to the European shipbroking and ship agency community.

2. The European Transport Policy in the First Decade of the 21st Century

Whilst some progress has been made in creating a level playing field in the integrated transport market, there remains a considerable way to go, especially in terms of balancing the costs of freight transport by road against short sea shipping. Until such time as road transport is required to pay the full cost of its environmental impact and infrastructure usage, a level playing field cannot be achieved between these modes and short sea shipping – with its

increased cargo handling costs - will not be able to take its rightful place as the safest, most efficient and most environmentally friendly mode of transport.

For many years the maritime sector has been considered as the standard-bearer in terms of high efficiency and low environmental impact and improvements in fuels, engines and operating procedures in Europe have ensured that its position has been further enhanced. Regrettably, however, the wide variation in methods of measuring pollution levels has allowed critics of the maritime industry to undermine its excellent performance, particularly when emissions per tonne/kilometre are compared. Those critics also ignore the fact that by its very nature the majority of emissions from maritime transport take place at sea and therefore away from centres of habitation, which cannot be said of road transport, and that freight transport by sea does not of itself contribute to congestion on major trunk roads.

All of these factors contribute to a failure by cargo generators to substantially increase their use of short sea shipping. It is those organisations, and in particular the major supermarket groups, logistics operators and similar, that need to be encouraged, or perhaps induced, to move away from a predominantly road-based transport system to one that is more focussed on short sea movements. With the significant profit levels being made by major supermarket chains, for example, it should be possible to make the move without an adverse effect on the delivered price to the consumer.

Development of more efficient engines, hull designs and other technologically advanced solutions to emissions in the maritime sector, at which European manufacturers excel, will continue to improve the environmental performance of the sector and the Commission should continue to take positive and practical action to encourage further progress. Given the specific needs of the maritime industry, and in particular its need to be able to operate safely and in a self-contained manner for extended periods away from land, it is only realistic to assume that in the short to medium the use of alternative fuel sources will be limited in the sector. Ongoing engine and fuel development will in due time bring about further reductions in NO_x and SO_x emissions.

3.6 Global Trends Affecting European Transport Policy

4.1 Quality Transport That is Safe and Secure

Clearly, increased integration of the EU with neighbouring countries and regions will bring with it new challenges for the European transport sector. There are, however, a number of current issues stemming from the relationship between the EU and its European neighbours that require urgent action. Harmonisation, and equally importantly the effective policing, of regulations on drivers' working hours and vehicle operating standards within the EU is a case in point. Not only are increasing numbers of vehicles based outside the EU operating in Member States without complying fully with EU regulations but an increasing number of vehicles from within the Community are also being found to be operating outwith those regulations. Clearly this has major implications for issues such as road safety and pollution as well as an economic impact in terms of unfair competition with operators that do comply with the relevant legislation. Urgent action is therefore required in order to ensure that all vehicles operating in the EU, whether based within, or outside, the Community are fully compliant.

4.2 A Well-Maintained and Fully Integrated Network

This is of utmost importance for the future operational efficiency of European transport. Delays due to infrastructure repairs, congestion and waiting for deliveries, modal transfers etc., all contribute to the cost of transport services and also to pollution.

In the maritime sector, ECASBA has regularly called on the Commission and national governments to increase the use and enhance the efficiency of smaller ports as part of the drive to increase short sea shipping. The increase in the size of deep sea vessels, particularly in the container trades, is concentrating cargo flows in fewer and fewer ports and this is leading to increased congestion in the ports themselves and their hinterland connections. It is also increasing the volumes of cargo being moved by road. Reviving local ports will spread the movement of goods across a wider area and also bring benefits to the local community in terms of inward investment, jobs etc.

Maximising the use of river and canal transport is another issue that needs to be addressed. Whilst the costs of maintaining canals and associated infrastructure are higher than for short sea operations, and their transit speed is significantly lower than for road or rail, the operating efficiencies and low emissions of the inland waterway networks are excellent and should therefore be utilised to their fullest extent.

4.5 Protecting and Developing the Human Capital

Certainly there will be major changes in working conditions for some in the transport industry as it adapts to new technology and enhanced working practices and action will require to be taken to manage the process with the needs of those people being kept at the forefront.

Unfortunately, however, the accession to the EU of lower-cost countries in recent years has seen a trend towards achieving cost savings by promoting the employment of citizens of these countries at the expense of workers from higher-cost economies, particularly in lesser-skilled jobs. Regrettably the “race to the bottom” the consultation refers to in paragraph 54 is already a reality in many Member States. In the transport field this is particularly evident in the increased use of trucks and drivers from eastern Europe at the expense of western European operators. Reduced standards and requirements in drivers hours, vehicle operation and other similar factors that impact on safety and distortion of competition also need to be taken into consideration.

4.7 Planning With An Eye to Transport

In addition to considering the factors stated in paragraph 60 planners should, in the case of ports and other maritime related infrastructure projects, also take into account the ability for expansion resulting from increased trade and throughput. There is also a need for a mechanism to ensure that planning decisions for major infrastructure projects are based on sound factual and scientifically-based considerations. Unfortunately a number of recent port projects have been rejected or constrained on the basis of unsound decisions, often relating to the anticipated environmental impact of the project. The significant economic, social and trade benefits to the entire Community of such projects requires that action be taken to ensure they are fast-tracked through the planning approval process. Of course this should not allow developers to over-ride the relevant planning and environmental regulations but extensive, expensive and time-consuming enquiries that seek to do nothing more than frustrate the

project must be stopped. Marine infrastructure development in Europe continues to lag behind developments in vessels and also similar progress in other parts of the world and as a result Europe's ability to compete is significantly degraded.

5. Policies For Sustainable Transport

Overall, ECASBA supports the proposals put forward, and in particular those relating to the need for focussed infrastructure, the adoption of common methodologies for the appraisal of infrastructure projects (see our comments in 4.7 above) and the upgrading of existing facilities. The concept of separating freight and passenger transport is interesting and we would be interested to see how this would work in practice. We would expect that the cost of both passenger and freight transport would increase as a result of a reduction in usage of existing infrastructure and the cost of providing the additional facilities.

ECASBA has perhaps been the strongest and most vocal supporter of the European Maritime Transport Space without Barriers concept and so we would once again urge the Commission and Member States to take urgent action to bring the project to fruition as soon as possible.

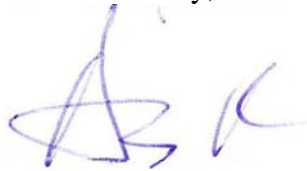
This should also be allied to the increased use of IT systems to reduce the need for, and streamline the transmission of, cargo and other data. We have previously called on the commission to recognise the huge investment in such systems that is already in place in the private sector – for example major logistics providers and the global container lines – and to ensure that any pan-European systems that are introduced are compatible, interoperable and recognise and make use of the significant investments already made by those companies.

As supporters of the increased use of waterborne transport – in all its variations – we would support the concept of internalising external costs and requiring modes to cover their environmental impact costs. Additional work requires to be done, however, to ensure the methodology employed is appropriate, relevant and provides accurate results.

Conclusion

In conclusion, ECASBA is pleased to support the overall objectives of this study and will be pleased to provide additional input on the maritime transport issues in the future.

Yours sincerely,



ANTONIO BELMAR DA COSTA
CHAIRMAN