



## Comments to the communication from the Commission on the future of the European transport policy

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### OUTLINE

#### **Our Alliance**

The Alliance for European Logistics (AEL) promotes a new policy agenda for European logistics services in Europe. The AEL brings together both the major providers of logistics services in Europe as well as global companies that rely on efficient logistics for the successful execution of their business operations. Its current membership consists of BASF, CEVA Logistics, Deutsche Post DHL, IVECO, Group Carrefour, AIR FRANCE KLM Cargo and Michelin.

#### **Our Sector**

The AEL is committed to raising the profile and understanding of logistics amongst European policymakers. Logistics is all around us and yet is often easily forgotten or incorrectly grouped together with other sectors of industry. It is crucial for political, regulatory and legislative stakeholders to see logistics not only in the limited sense of goods transport and warehousing, but also in the wider context of the complex macro-economic role it plays in helping deliver a competitive European industrial base. **The logistics sector itself was the biggest industry sector in the EU in 2008 in terms of revenue; generating €950 billion** (cf. 'The Top 100 of Logistics 2008/2009' by Klaus and Kille, ed. DVV Media Group). It is also an important partner and service provider for all economic actors within both the European and global sphere. The AEL therefore seeks to address the serious discrepancy between the importance of logistics for the economic well-being of the EU and the lack of integrated vision by decision-makers.

#### **Our Conviction**

**The competitiveness of European industry, whether in the service or manufacturing sectors, is increasingly dependent on logistics.** Due to the huge pressure on company costs brought about by the financial and economic crisis, companies will more and more be working with logistics operators to realize the potential savings of 10 to 30% that optimizing logistics can offer. At the same time, logistics providers are in a position to reduce their own carbon footprint, and that of their customers. This can be achieved by optimizing supply chains and the energy balance of all logistics activities as well as restructuring corporate processes with the aid of the numerous digital technologies now available. It is therefore our firm conviction that the logistics industry can play an essential role in increasing both the competitiveness and sustainability profile of Europe's industry as a whole. European policymakers hold the key to unlocking this potential by **completing the Internal Market for freight transport services on each mode, addressing infrastructure bottlenecks, stimulating innovation and minimizing the regulatory and administrative burdens on industry.**

## **TEN RECOMMENDATIONS FOR ENSURING A SUSTAINABLE AND INTEGRATED EUROPEAN TRANSPORT POLICY FOR THE NEXT DECADE**

- 1.** The creation of a more **integrated longer-term strategy for logistics**, based on realistic scenarios for 2020 and recognizing that logistics is the backbone of European competitiveness.
- 2.** Closer **coordination between industry and the European Commission** on key strategic decisions enabled by
  - the creation of a high-level EU stakeholders' group for logistics with a broad-based industry representation and
  - the creation of a logistics think-tank in the European Parliament, in which the major issues in logistics can be discussed in depth across party and committee lines
- 3.** Enhanced **coordination between the services of the Commission** to implement an integrated cross-modal transport policy, taking into account the entire value chain of transport and logistics services, with all actors involved.
- 4. Prior and complete impact and risk assessment based on sound market and industry understanding and reliable data.**
- 5.** Completion of the **internal market** for all modes of transport
- 6. Unburden business from administrative and operational bottlenecks** including customs and security measures
- 7. A more "balanced approach" to reduce the environmental footprint of transport** i.e. introducing gradually technological progress (e.g. cleaner vehicles), operational measures (e.g. eco-driving), infrastructure improvements (e.g. rail freight dedicated framework, intermodal hubs and efficient traffic management systems) and, only if required, economic instruments;
- 8. Financial incentives to reduce energy consumption** e.g. investment in fleet renewal, ITS devices, electric, natural gas and hybrid trucks, education and training, consulting services and sustainable real estate solutions.
- 9.** Investment in key European **intermodal corridors** completed by a network of **intermodal platforms**.
- 10.** Securing **global and fair trade**

1. The creation of a more integrated longer-term strategy for logistics, based on realistic scenarios for 2020 and recognising that logistics is the backbone of European competitiveness.

**The current economy already relies increasingly on an extended and more tailored supply chain.** Logistics managers need to provide global coverage with proven and robust systems and processes. They must be able to use more functional and flexible technology that enhances supply chain transparency.

**European competitiveness relies on efficient and sustainable supply chains.** The benefits brought by logistics and transport services to European industry and society in general should be better recognized. Its direct link to GDP indicators should be highlighted. Efforts to promote a more efficient logistics industry would help to decrease costs and to create jobs within the EU. Therefore, an efficient logistics industry would hamper delocalizations and develop exports increasing the EU competitiveness.

**Supply chain design plays a critical role in efficiency, security and sustainability.** Logistics managers constantly model and improve their own networks as well as the supply chains of their customers, often to great effect. This can drive:

- Improved general efficiency
- Modal shifts
- Vehicle shifts
- Sourcing strategies
- Routes to market
- Site locations and serving areas
- Service level strategies
- Supply chain security
- Improved consolidations

The logistics industry is challenged by the following macro-economic and industry trends:

- **Globalization** is expected to continue despite some signs of increased protectionism;
- **Increasing transportation and logistics costs:** Transportation costs represent the largest cost block for logistics. They have diminished by nearly 50% between 1987 and 1998 mainly due to the liberalization of freight services but between 2003 and 2008 these costs climbed up again by 35%. This turnaround has been triggered by globalization which entails greater transportation distances and a sharp upturn in increasingly high-priced sea freight. Road tolls and fuel costs have also contributed to this development. After many years of decline, logistics costs are again rising across Europe. **In the five years from 2003 to 2008, logistics costs increased by 20%. A further increase of the same range is expected up to 2013** (cf. 6<sup>th</sup> European ELA & A.T. KEARNEY Logistics Study, July 2009);
- Increased transportation cost, risks due to infrastructure bottlenecks, security bottlenecks and increased length of supply chains leading to '**regionalisation**' of supply chains;
- Ongoing recession expected to increase tendency to consider **outsourcing** in the mid-term as companies strive to reduce costs and focus on their core competency (especially for SMEs);

- **Digitisation of the supply chain** will be achieved by emerging technology standards and information/item flow linkage that creates new opportunities. The “Internet of Things” will become a reality;
- Reduction in global demand due to the economic slowdown has led to a record fall in crude oil prices. However, **high oil prices and oil scarcity** will remain a challenge in the medium term. It will mean that resilient operating models will need to be developed in order to deal with high oil prices (i.e. by improving utilisation of networks and modes and improving fuel-efficiency);
- **Urbanisation** will continue and will demand innovative urban logistics solutions;
- **Sustainability** will continue to remain a key element of the supply chain; there will be the strong pressure (and opportunity) to redefine low-value supply chains/modal mix and to optimise efficiency/capacity utilisation. Innovation will play a key role in combating climate change. Eco-friendliness and sustainable transport will more and more determine purchasing behaviour but price will limit ethical purchasing decisions especially in the difficult economic period.

In order to address these challenges the logistics industry requires more and more well educated logistics managers and ICT engineers. It will rely less on blue collar employees. However, today university level education programmes focused on logistics are not widespread.

These pressing challenges must be used as a basis to shape an integrated European Transport Policy. Such a policy must provide a **suitable regulatory framework that enables more sustainable operations and less complexity for industry. It must be driven by market liberalisation and the completion of the Internal Market for transport in all modes.** Every effort should be made **to stop the ongoing increase of cost-pressure on the logistic industry** and to avoid burdening the sector with additional taxes and charges.

## **2. Closer coordination between industry and the European Commission on key strategic decisions**

**The key strategic direction for logistics needs to be discussed at a wider level. Such discussions should involve the concerned industry and, at a minimum, the European Commissioners for Transport, Industry and Enterprise, Internal Market, Environment and Trade, as well as the President of the European Commission.** The relevant industries include not only the logistics groups themselves, but also the suppliers and customers of logistics services.

**It should be recognised that each mode of transport is a necessary part of the supply chain.** Logistics managers use all modes of transport depending on the needs of their internal or external customers. According to the principle of “co-modality”, each mode of transport should be made individually more efficient, competitive, secure, safe and sustainable. Interconnections between different modes of transport should be run as efficiently and smoothly as possible.

In order to enhance the understanding of the logistics sector and achieve the adoption of a suitable policy framework, we support:

- The creation of a **high-level EU stakeholders’ group for logistics** with a broad-based industry representation, in which the major issues of logistics can be discussed thoroughly, and

- The creation of a **logistics think-tank in the European Parliament**, in which the major issues in logistics can be discussed in depth across party and committee lines.

**3. Enhanced coordination between the services of the Commission to implement an integrated cross-modal transport policy, taking into account the entire value chain of transport and logistics services, with all actors involved**

In 2007, the Commission's **Action Plan for Logistics** (COM (2007)606) **recognized for the first time the importance of this sector, which goes beyond the sum of the benefits of each mode of transport**. In its Communication on freight transport logistics (COM(2006)336) the Commission stated that *"logistics measures are indispensable for maintaining and increasing European competitiveness and prosperity in line with the renewed Lisbon agenda on growth and jobs"*. In order to achieve that, a logistics perspective should have been integrated into European transport policy. As stated in the Communication, *"logistics considerations should be an underlying factor in decision-making"*.

Although a separate logistics unit has been set up, some of the most important policies have taken a very long time to be implemented, whilst others have failed to deliver the expected benefits or did not match the industry's needs. This is due to the fact that **DG Transport and Energy** continues to conduct policy from a modal approach which often overlooks logistics. **Future European transport policy should be cross-modal and take into account the entire supply chain from the producers and manufacturers to the end customers.**

Furthermore, **DG Enterprise and Industry** should contribute when it comes to major decisions affecting the logistics sector given that these decisions indirectly impact European industry. Logistics industry issues should be regarded from a services point of view as well as from an industrial policy approach.

**DG Internal Market and Services** should be committed together with **DG Transport and Energy** to complete the Internal Market for all modes of transport. The upcoming internal market monitoring and review for services could be one useful tool to achieve a better understanding of the internal market issues of the logistics services industry and its impact on retail.

An objective dialogue between the logistics sector and **DG Environment** factoring in requirements and realities of the logistics industry should be established. The logistics industry would like to see DG Environment as an ally, certainly if EU legislation hampers optimisation of logistics services and prevents environmental efficiencies from being achieved.

**Increased coordination between the different Directorate Generals of the Commission has the potential to significantly improve policy that impacts directly or indirectly on the transport and logistics sector.**

**4. Prior and complete impact and risk assessment based on sound market and industry understanding and reliable data**

In accordance with the **"Better Regulation"** principle, a **complete impact assessment** is required before adopting any initiative. In this respect, the **specificities of freight transport** should be considered with as much attention as those of passenger transport.

On past occasions, for instance in the impact assessment for including aviation in the EU Emission Trading System, the external consultants appointed by the Commission refused to meet with the air cargo and express industry. Therefore, throughout the following legislative process, the specificities of air freight transport were not addressed to a satisfactory level.

**Any impact assessment needs to incorporate a horizontal view. A “silo approach” for transport and environment policy proposals can lead to inefficient, complex and discriminatory rule-making. A key industry warrants such a horizontal approach.**

For example, **regarding the internalisation of the external costs**, the scope and boundaries for measuring external costs for each mode of transport should be based on identical criteria and principles and equally applied to passenger and cargo transport. External costs caused by existing bottlenecks in infrastructures, by the lack of efficient traffic management systems or by regulatory restrictions applied to transport services should not be taken into consideration. Furthermore, the impact assessment must take into account:

- **All measures already in place for reducing the external costs concerned** (e.g. fuel taxes, tolls, VAT, road tax) in order to avoid transport operators paying twice for the same external cost,
- **The negative effects of transport on the environment but also its positive effects for the European economy and society as a whole**, in terms of competitiveness, sustainability and jobs,
- **All alternative EU policies and regulations that can tackle external costs of road transport** (e.g. completion of the Internal Market for freight transport services, full liberalisation of road cabotage, efficient road traffic management systems, a dedicated rail freight network, cleaner fuel and vehicles, eco-driving, fiscal incentives for the cleanest vehicles, noise barriers, etc.),
- **Consistent assumptions and data to establish a formula ensuring accurate cost calculation** (e.g. the formula provided by the Proposal to calculate noise costs is only based on noise data from Germany but must be applied for all EU Member States. This is highly questionable since noise costs depend very much on the local conditions and landscape).

Furthermore, the consultants and organisations used to carry out the assessment should include an increased appreciation of the value chain of the transport and logistics services of today and tomorrow, in order to improve the quality of impact assessments.

Regarding **security measures imposed on the transport sector**, there should be no adoption of any new security regulation prior to a comprehensive impact and risk assessment in close cooperation with the industry. A balance must be drawn between security procedures and the free flow of trade. It is necessary to take account of the existing regulatory security measures and of the industry’s self-regulatory security schemes before adding new measures. **As regards terrorist threats, freight transport has different characteristics than passenger transport. A balance between anti-terrorist policy requirements and flexible time-sensitive logistics operations must be found.** If not, new and unnecessary security measures at the European and national levels will make logistics operations more difficult, create delays and will, in the end, harm European competitiveness. **Higher national security measures** above EU harmonised measures should only be possible when there is a **justified** heightened threat at a country level and they should be **directly financed by the State concerned**.

5. **Completion of the internal market for transport services is a prerequisite for an efficient and sustainable logistics sector for today and tomorrow**

**The lack of a truly harmonised Internal Market for all modes of transport is hampering a seamless and more environmentally-friendly cross-border transport flow, which costs time, money and energy.** The current restrictions for road cabotage remain obstacles to efficient services and are responsible for up to 30% of trucks running empty. Despite an opening up of the market in 2007, the rail freight sector fails to deliver satisfactory reliability for cross-border services which prevents a larger use of rail freight. In air transport, delays in the creation of a Single European Sky (SES) prevent a possible saving of 12% CO<sub>2</sub>-emissions per flight. Furthermore, the Trans-European Transport network (TEN-T) programme faces technical and financial difficulties in interconnecting national transport infrastructures to create a genuine trans-European network (e.g. the implementation of the European Rail Traffic Management System was unnecessarily delayed).

We believe that the completion of the EU Internal Market for all modes of transport is the key to managing the future predicted growth of logistics services.

In particular, the following measures should be completed without delay:

Road:

- Full liberalisation of cabotage operations
- Speeding up the revision process of Directive 96/53/EC on vehicle weights and dimensions getting the full benefits of European harmonisation and of the introduction of longer and heavier road vehicle combinations
- Better enforcement of working and resting time
- Improved use of the tachograph combined with ITS technologies

Rail:

- Implementation of the 1<sup>st</sup> railway package
- Creation of rail freight priority corridors
- Implementation of ERTMS

Maritime:

- Implementation of the actions of the Action plan to establish a European maritime transport space without barriers (including maritime cabotage)
- Expand operations of the Motorways of the Sea
- Need of efficient ports offering intermodal solutions (inland waterways, road, rail), rapid transshipment services from sea to land, reliable and affordable services, transparency of charges and taxes, screening facilities if required
- Implementation of key performance indicators to measure port performance in terms of time and costs saved

Inland Waterways:

- Implementation of the NAIADS programme
- Promote use of inland depots with feeder services to less congested ports (called “out-ports”) to bypass congested depots (This would increase usage of barge and allows that goods are removed from ports more rapidly, requires fewer kilometers by trucks to reach the final destination of the goods and, at the end, improves logistics efficiency)

Aviation:

- Completion of the European aviation area: replacing all existing bilateral agreements between EU Member States and automatically granting full 5th and 7th freedom rights to all EU carriers from all EU Member States
- Implementation of the Single European Sky II
- Secure that the conditions provided for aviation in the EU Emission Trading System remain well balanced, non-discriminatory, workable and efficient

Furthermore, the Commission should **ensure transport service providers have fair market access on transport infrastructures and intermodal platforms**. Management of transport infrastructure should be fair, independent and transparent.

We believe that fair competition between transport service providers enhances quality and sustainability of transport and logistics services. Competition between intermodal platforms should also be secured to lead to **reliable loading and unloading services**.

**Any infrastructure charge should be set up in full respect of the transparency and cost-relatedness principles and after consultation of the users.**

**6. Unburden business from administrative and operational bottlenecks including for customs and security measures**

In October 2007, the Action Plan on freight logistics identified many administrative, operational and infrastructure bottlenecks to overcome in order to facilitate logistics operations in Europe. In turn this will benefit all European manufacturing and services industries. Unfortunately, most still remain due to delay in the implementation of the Logistics Action Plan.

The logistics sector cannot wait any longer for the following measures to be implemented, in particular:

- Simplification of administrative compliance via a **one administrative stop-shop based on IT system for administrative procedures (including e-customs clearance) in all modes** (the e-custom initiative of the DG TAXUD should be integrated into the “e-freight” initiative of DG TREN);
- **Centralised customs clearance including single authorisation for simplified procedure** to perform the customs formalities in the Member State where the economic operator is established, for his imports/exports wherever they occur in the Community;
- **Single and digital transport document for cross-border and intermodal transport;**
- **“e-Freight” and Intelligent Transport Systems (ITS):** EU and national investment plans should be adopted and implemented in a coordinated manner in order to allow an electronic flow of information along the physical flow of goods;
- **Open standards for transport technologies** to avoid technological barriers and extra costs;
- **Ensure interoperability** for global ICT logistics applications across transport modes;

- **Key actions for securing a wide and successful implementation of the AEO programme:** more trade facilitation benefits to AEO operators, simplification and harmonisation of the AEO accreditation process; any new specific security certification programme should take into account the AEO programme to avoid duplication of certifications (possibility to get automatic recognition);
- **Application of the risk-based and cost-effective principles to transport security measures** to avoid unnecessary barriers to the free flow of trade within the Internal Market. For instance, the proposal on enhancing supply chain security (COM(2006)79) was pre-mature and would not have helped to provide the public or the industry with effective measures against terrorism;
- **Adoption of the Action Plan for urban mobility creating a framework to exchange best practices on urban logistics between local authorities and promoting dialogue between local authorities and logistics companies;**
- **Facilitating integration of warehousing services with transport services along the supply chain** by removing administrative, fiscal and infrastructure bottlenecks.

In order to overcome logistics and transport bottlenecks, industry working groups should be set up to make recommendations to the Commission. The stakeholders involved should come not only from the different transport modes but from the entire value chain including retailers, shippers and manufacturers. This will allow bottlenecks such as access to transport infrastructure, access to the delivery place, time of delivery, etc., to be addressed.

**7. A “balanced approach” to tackling the external costs of transport i.e. introducing gradually, if required, technological progress, operational measures, infrastructure improvements and economic instruments.**

As a matter of principle, the prerequisite to establish any fair, transparent, proportionate and easy mechanism for the internalisation of the external costs of transport is to have a **thorough understanding of the transport sector.**

Unfortunately, for instance, the proposal to revise Directive 1999/62 on the charging of heavy goods vehicles for the use of certain infrastructures (COM (2008)147) was based on false assumptions regarding the business models for the road freight transport of today. For instance, road transport patterns are commanded by customer and regulatory demands which make a shift to the cheapest time zone unrealistic. In addition, shifting to rail often has no economic sense due to the short distance of transportation – the average distance for road freight transport in Europe is 109 km (source: Eurostat doc 66/2008) – or is impossible due to poor service quality and/or missing rail and intermodal infrastructures. The external cost charges, as proposed by the Commission, will therefore not lead to the desired positive effects on both the environment and congestion in Europe.

However, new fuel and vehicle technologies are efficient in reducing external costs of road transport:

- Optimisation of vehicle fuel consumption enabled a decrease in CO<sub>2</sub> emission of 33% from 1991 and 2004,
- Nowadays 13 trucks are no louder than a single one in 1980,
- EURO V trucks exhaust more than 95% less air pollutants compared to 1990 levels

(cf: [http://www.acea.be/images/uploads/files/20090317\\_CV\\_brochure.pdf](http://www.acea.be/images/uploads/files/20090317_CV_brochure.pdf)).

A “balanced approach” is, therefore, recommended to tackle the external costs of transport without hampering the transport and logistics sector and European competitiveness. In practice, technological progress (e.g. cleaner vehicles), operational measures (e.g. eco-driving), infrastructure improvements (e.g. rail freight dedicated framework, intermodal hubs and efficient traffic management systems) and economic instruments should be introduced, if required, gradually.

**Charges and taxes should only be applied in last resort and at least not before the completion of the Internal Market for all modes of transport.**

**Furthermore, if charges and taxes related to external costs cannot be avoided, their revenues should at least be clearly earmarked to finance measures to reduce the externalities of the mode of transport concerned** (e.g. walls along motorways to reduce road transport noise).

**8. Financial incentives to reduce energy consumption e.g. investment in fleet renewal, ITS devices, electric, natural gas and hybrid trucks, education and training, consulting services and sustainable real estate solutions**

**Financial incentives** (e.g. credits with low interest rate or subsidies) at the EU and/or at the national level should be encouraged for applications, technologies and solutions enabling a reduction of energy consumption but costing more than the conventional solution/technology. Regarding the ground fleet, this should be allowed for **investment in EURO V vehicles, aerodynamics features, ITS devices and electric and hybrid trucks.**

Similar programmes should also cover **real estate solutions** (lightings, photovoltaic roofs etc.). One prerequisite for these financial incentives could be the implementation of an **energy consumption monitoring system**, so that the CO2 reduction and energy saving can be tracked. This system should be based on ISO standards or industry certifications programmes.

**EU or national plans should reimburse professional consulting advice on greening initiatives** (which are also cost reduction initiatives, e.g. energy, waste and water consumption reduction in office buildings and warehouses).

**9. Investment in key European intermodal corridors completed by a network of intermodal platforms**

The completion of the cross-border transport corridors (TEN-T) has not been accomplished. However, **supply chain operations need a reliable transport infrastructure network across the EU combined with a network of intermodal hubs. The definition of the corridors should be done in close cooperation with industry in order to meet the flow of goods.**

**Innovative logistics solutions also require specific funding**, in particular through the CIVITAS programme.

Investments should also target the **integration of traffic management systems** for all modes of transport, in particular on cross-border intermodal corridors and for urban logistics solutions.

State aid rules should be reviewed to prioritise EU transport infrastructure projects (not only national projects).

## 10. Securing global and fair trade

The Commission should support the logistics and transport sectors outside the EU to expand their value chains including production, security, customs and maintenance.

In particular, industry urgently needs **mutual recognition agreements on customs and security programmes between the EU and third countries**.

Air cargo carriers require the Commission to negotiate **“Open Aviation Area” agreements** (first with the US) including liberalisation of the ownership and control rules and reciprocal market access (including cabotage) for the air cargo sector.

The Commission needs to speak with one voice at intergovernmental organizations to achieve international regulations and standards.

For all modes of transport, **fair competition between EU and third-country carriers** is required (e.g. EU ETS should apply to all carriers operating to/from and in the EU and third-country environmental programmes should equally treat EU and national carriers).

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