



PUBLIC CONSULTATION ON THE COMMUNICATION ON A SUSTAINABLE FUTURE OF TRANSPORT

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EIA and EIRAC Joint contribution

Foreword

The European Intermodal Association ([EIA](#)) is an NGO open to all transport modes: rail, road, ocean/river, air. Its aim is to improve cooperation among the different modes of transport, since the logistics chain still has many infrastructural, technical, organisational and legal shortcomings. Therefore, this neutral organisation with more than 90 members is suitably qualified to discuss controversial subjects and propose well-balanced sustainable solutions in line with and geared towards improving EU transport policy.

The European Intermodal Research Advisory Council ([EIRAC](#)) is a de facto Technology Platform set up to guide public and private investments in relation to the current 7th Research Framework Programme in the EU and its member states. EIRAC has produced the *SIRA* (strategic intermodal research agenda) and an Implementation Plan. The replies for EIA are taken from its general political mission and regarding EIRAC, for the specific research & innovation aspects.

Introduction

In its transport policy the European Union has correctly identified the overall guideline: sustainability. Environmental impact was already central to the EC White Paper 2001 and it was emphasised even more strongly in the 2006 mid-term review. There is no alternative for our common future, since (natural) resources allow no negotiation. All further objectives and targets have, by definition, to be subordinate and must therefore be addressed from the sustainability angle, in order to produce policy and research that strikes a fair balance between the three mainstays of economic (€), social (jobs) and environmental (living biosphere and future industrial resources) considerations.

The EIA is pleased that the notion of sustainable mobility is gaining ground. It has now been embraced by environmentalists *and* businesses, by public and private stakeholders. Nonetheless, we have to take care that stakeholders do not use these notions for marketing purposes only (e.g. interesting initiative taken in Norway: car producers are not allowed to market cars – even hybrid – as being ‘green’). Sustainable mobility, in many cases therefore intermodal or combined transport solutions (including terminal & logistics elements), will have to be taken more seriously at commercial or boardroom level. It should be mentioned in company vision and strategy with clear measurable sustainable KPI’s (key performance indicators) and the corresponding efficiency savings & gains.

Although there is a growing awareness of the transport sector’s disproportionate impact on the environment, an EEA report (European Environment Agency, report 2009) shows there is little progress in improving performance or any kind of shift to sustainable transport in Europe. Previous and current EU policies have mainly focused on improving vehicle technology and fuel quality to reduce pressure on the environment.

Trends and projections show that these policies did not really succeed sufficiently in reducing CO2 gas emissions from transport, while any mitigation measures were more than offset by increased transport volumes. Therefore, policy instruments and measures must address the *demand* for transport more intensively.

Citizens should not aim to consume less, but merely to consume more consciously, whereas the transport industry will be – or should be able to use infrastructure more intelligently, sharing scarce capacity between partners and competitors in a logistics chain, educating end users via behavioural measures, creating awareness about the cost-consequences of ‘being mobile’ in media campaigns, and dissemination of [best-practices](#).

Fair competition between modes is an important framework condition, enabling the development of sustainable logistics chains or corridors, making optimum use of the inherent advantages of each mode in a balanced industrial intermodal network approach. Fair competition has unfortunately not been implemented in all EU member states.

(1) Infrastructure: What can the EU do to promote the integration of modal networks as well as their maintenance and enhancement? What should be the priorities for investment? Which measures would allow better exploitation of the networks and more balanced use of the different modes?

The Communication from the Commission COM(2009)279/4 underlines the fact that transport is a network industry and that, even if advantage should be taken of the relative strength of each mode, the network should be understood as a single entity. Consequently planning, building, operating and maintaining the infrastructure network should be executed in extremely coordinated fashion. An interesting initiative is being taken by Sweden: as from 1 April 2010 it plans to merge Banverket (rail infrastructure) and Vägverket (road infrastructure) into ‘Trafikverket’. This measure could help to balance road and rail infrastructure development. In fact, there is a difference between them: on the road side the demand for more infrastructure is visible from vehicle congestion, since vehicles normally set out on their trip even if there is no capacity available, whereas the railways only place trains on the line if there is room for them within planned capacity slots (ditto for airlines). This should become more evident to the public.

The Commission points out that the integration of aviation with high-speed rail will be a crucial development. We support this opinion and extend it to the connection of high speed-rail and air *cargo*. The EIA has taken up this subject particularly as an answer to the night bans at airports, where it is cooperating with initiatives such as CAREX (Cargo Rail Express) in France/Netherlands. A European standard has to be developed for this new intermodal technique.

Bold but necessary: why not define performance standards for the European cross-border freight corridors in the same way as for motorways (Autobahnen) for all road transport, as they have been defined by UNECE for the system of "E-highways? European financial support could be linked to the condition that the Member States respect these standards. The [FERRMED](#) initiative is a positive approach in this direction. Freight railways are not bound to stay within the standards of the past, as the passenger high-speed rail development has proven.

Quotation from EIRAC's Strategic Intermodal Research Agenda 2020 (SIRA) & Implementation Plan:

Development of a single overall general requirements list for IT in terminal infrastructure. Includes information about the conditions under which IT is optimally used in terminals, with the aim of controlling all points in the supply chain and improving the throughput of terminals, maximising the use of storage area and improving quality of service.

Rail freight and passenger traffic continue to share the same infrastructure with priority being given to passengers. Passenger and freight traffic could in theory be separated on the train diagram or at least freight should have dedicated priority lanes. Facilitate a showcase: How to run a railway network efficiently for both passengers and trains? Different regulations for passengers and goods are a barrier to effective business models. Initiatives around security should not be limited to passenger transport. Freight security initiatives such as secure parking for trucks should be emphasised, as this is an ever increasing problem.

Reliability in today's business environment is important and, if the Commission wants to move more retail oriented products to rail then aside from speed, predictability can be the key.

Infrastructure should not only focus on the physical execution of the freight service. Data and documentation are equally important. The sector needs standardisation across different modes of transport with seamless data traffic to follow and facilitate cargo.

(2) Funding and pricing: What can the EU do to ensure that prices in transport correctly reflect their cost to society? What actions should be considered for implementing the 'polluter-pays' and 'user-pays' principles in transport? What should be done with the revenues thus obtained?

In the absence of an unbiased policy of internalisation of external costs, the accounting costs presented to transport and logistics market players are out of line with their resource costs. This leads to misallocation of resources and less than optimum product/service profiles across the transport modes.

The price is almost the only instrument in a market economy to influence and change the market. Therefore the correct transport price is of paramount importance in developing the properly balanced involvement of the different modes in transporting freight. For decades this problem has been discussed, with no satisfactory result to date. The integration of external costs in the transport price is rather challenging because of the complexity of the scientific and social dimension. But under the overall objective of "sustainability" we are no longer in a purely theoretical position. The Eurovignette is at least a pragmatic approach which should soon be put into practice!

A sustainable transport policy automatically means an overall all-mode transport & energy policy. A sustainable transport policy is always related to the broader policy of general sustainability. Accordingly, the shared effects of transport policy measures in other areas, i.e. 'secondary benefits' and trade-offs, must be taken into consideration. Since with any sustainability policy there is the risk that it may be mistaken for an environmental policy under a fashionable new title, it is important to continually highlight the importance of the socio-economic dimension, not forgetting to involve citizens and the business community from an early stage.

The recent initiative of French President, Nicolas SARKOZY, to introduce a CO2 tax is an interesting example of proactive policy, under the condition that price increases must be prevented if possible (innovative production methods), otherwise to be forwarded all the way to the end user, thereby effectively internalising hitherto external costs. However, this system must not 'leak' revenues; it needs to be earmarked or 'channeled' into the donating system, instead of being used to offset fiscal deficits.

In this context a further initiative of President SARKOZY could be mentioned: the report by the Commission on the Measurement of Economic Performance and Social Progress (Prof. [Stiglitz](#), Sen, Fitoussi a.o. by which a new way of developing a dashboard *for combining GDP, Quality of life, Sustainable Development and Environment* is proposed.

Quotation from EIRAC's Strategic Intermodal Research Agenda 2020 (SIRA) & Implementation Plan:

No single mode of transport can cope with growth on its own. Volumes were increasing and will increase again. Intermodality is and will be an indispensable player, and now is therefore the time to start correcting any unfair and improperly balanced situations.

(3) Technology: Many technologies are being developed or are already available to improve the environmental performance of transport, increase safety and reduce congestion and dependence on oil. What can the EU do to accelerate the development and deployment of these new technologies?

Future technology research should take a long term view of (co-modal) ways of ensuring that transport systems generate benefit in the long term. Since energy demand from the transport sector has risen (37%, 1990-2006) and is still rising, the energy and climate change impacts of transport will move up the political agenda, to be followed by technological research. This should involve adaptation measures to deal with the impact of climate change and measures to limit such impact, right from the design phase. In this context, the (scattered) transport industry should learn from some manufacturing industries in how to adapt production methods (selling innovative concentrates instead of space-consuming powders).

The proper EU authorities have to identify which technologies have the greatest potential for success in terms of implementation, wide applicability and the limited infrastructure requirements needed.

The Commissions' Paper underlines the importance of standards in this field. Particularly for intermodal transport, standards fostering the "interoperability" between modes are indispensable. Above all, the standards in the field of weights and measurements must be fixed if not for ever, at least for a period during which all modes can adapt to new agreements. The so-called Megatrucks or Ecocombi's might independently have offered some economic advantages, but they do not fit in with a policy of intermodality; they must be restricted to exceptional operations and not be generalised.

Further policies and research are required on making infrastructure, vehicles, systems and engines more sustainable and recyclable, while encouraging greater market penetration of [innovative intermodal technologies](#).

To facilitate integrative technological approaches, a cooperation model such as the Swedish one mentioned (topic 1) could help to develop a mode cross-modal ICT guiding system, possibly with the help of Galileo.

The Americans (public private partnership) are pushing forward the development of fuel cell locomotives. Could this technique – besides replacing the still numerous diesel engines - be helpful in increasing interoperability between countries with different current systems while meeting the Kyoto requirements?

The EC should endorse all ongoing initiatives aiming at serving trade, [streamlining industrial transport and logistics processes](#), harmonising communications framework conditions and ICT platforms to facilitate, or even better to assemble the global intermodal container industry, logistics and trade-facilitating authorities.

The development of new driving assemblies (energy resources, engine efficiency, exhaust emissions etc.) seems to be half-heartedly pursued. The present International Automobile Shows tend to be more window-dressing than practical achievement (in Europe). Why is the automatic 'stop-start' system in automobiles not yet standard? It could considerably contribute to avoid urban pollution.

Quotation from EIRAC's Strategic Intermodal Research Agenda 2020 (SIRA) & Implementation Plan:

Improve systems and services for handling and transfer. In 2020, the Intermodal sector will need to use the most efficient transfer methods in order to become more reliable, faster and lower cost. Take forward the E - freight initiative and prepare Intermodal e-documentation. The sector asks the EC. to support the development of a single standard for the application of RFID. Avoid a situation where ISO and new RFID standardization body both work on (incompatible) RFID standards. Introduce a CO2 certificate for the transport sector.

(4) Legislative framework. What can the EU do to further improve working conditions, health, safety and security standards in transport and the rights of passengers? In which sectors should market opening be pushed forward and how? What measures of a regulatory nature should be considered to reduce the transport sector's environmental impact?

Intermodal will create EU jobs and boost economic growth, enhance mobility, increase energy efficiency, reduce greenhouse gases and improve quality of life for all Europeans. Since intermodal transport is increasingly regarded as the backbone of trade and globalisation, legislation should facilitate a worldwide harmonised system. For decades, harmonisation of the Western European and the East-European/Asiatic railway transport law could not be achieved. Recently, an agreement between EU and the [OTIF](#) did not come to a positive end. The [Rotterdam Rules](#) do not really respond to the interests of the surface intermodal partners.

Quotation from EIRAC's Strategic Intermodal Research Agenda 2020 (SIRA) & Implementation Plan:

Intermodal education and training offers tremendous opportunities. Training institutions and promotion organizations should be facilitated in their actions reaching out for potential users of intermodal transport. Intermodal curricula, including individual training programmes, recognition of certification, education, definition of target groups, producing and publishing content. For selected industries, i.e. ICT providers, more adequate didactical methods for transferring typical intermodal knowledge would be beneficial. Intermodal courses will then be perceived as "a must" within educational institutes, the full potential of knowledge will be utilized through greater coherence between education/training and business operations.

Dissimilar (liability) regulations concerning intermodal transport of goods across the EU for all modes of transport are a handicap for organization and productivity. They are a barrier to seamless and flexible interoperability within intermodal transport which is inefficient and costly. A harmonized set of regulations (single transport document) is needed, at least EU-wide and later probably worldwide. A framework should define what is meant by "equal conditions" for competitive intermodal transport operations (especially compared with a road-only transport option which implies less documents, because less operators and players are involved).

The definition of 'dangerous goods' should be harmonised for all modes and all countries. Crossing borders by rail and short sea should be simplified. Based on new common legal foundations, the result will be a prepared market, ready to adopt innovation.

Improve the robustness of Supply Chains in times of crisis. There is a risk of an unintentional decrease in the variety of market players, due to economic swings. Especially in times of crisis, the reaction time for accessing available funding (payments system) should be significantly shortened. The proper-measures to keep experienced staff in companies during economic swings.

(5) Behaviour: Sustainability of transport also depends on sound planning and on a change in transport habits. Are there measures that can be taken at EU level to improve accessibility and modify transport needs and behaviour?

Since technology (research) alone will not meet climate change targets, behavioural changes will also be needed, while the focus should be on the integration of these two approaches into a holistic approach. While behavioural change is politically more difficult to achieve, it can offer more direct impact than the development of new technologies.

We need a thorough discussion at EU and national level regarding the significance of the parameter **time** (speedy versus punctuality) which often wrongly influences car ownership, mode and route choice, distribution planning and the consequent (d)effects on mobility, environment and businesses (as communicated already in 2007 (*‘Intermodal; the key to sustainable logistics’*, [EIA](#)). Government policy is therefore needed, facilitated by social science research, to address these social behavioural challenges of encouraging more environmentally sensitive approaches to travel.

The most challenging but indispensable method to adapt users to a modern sustainable transport system is to take away the anxiety about **change**. Changing the behaviour of the human race (“condition humaine”) is the most ambitious undertaking and therefore the hardest part of political activity. We have to convince the population that the future will bring promising opportunities. Consequently, policy makers should develop not only a long term sustainable policy, but also a positive vision and a ‘Trustability’ strategy to facilitate trade and transport, how to obtain opportunities in terms of more punctual or quicker/greener/raising security/better overall control/less expensive congestion, more efficient energy use etc).

A White Paper covering a 10-year period is probably not sufficient considering that the mere planning and building transport infrastructure (for example tunnels) takes at least 20 to 30 years or even more (Simplon, Gotthard, Brenner). The WP should therefore be supported by a brave sustainable business vision elaborated by a multidisciplinary think tank (mix of inventive power and market experience). There is a need for a long term vision on how to develop a transport system designed for long term environmental & business benefits.

Strong media campaigns should bring about the message that European freight should remain mobile, nonetheless *confronting all stakeholders with the costs, consequences and co-modal alternatives*. We have to seek ways of making commercial operational responses more consistent with the needs of government policy on the environment, obviously after having created fair competition among modes. Stakeholders as target groups are also to be found outside the transport sector; manufacturing industry, employer and employee unions, health sector, educational bodies, the public at large, etc.

Quotation from EIRAC’s Strategic Intermodal Research Agenda 2020 (SIRA) & Implementation Plan:

Co-operation and common quality goals for logistics. Sustainable benefits for individual companies are hard to determine, while the logistics sector as a whole can profit immensely if intermodal systems are taken into use. Mind shift towards common quality goals. Introduction of a standard reliability level, based on punctuality.

Additional taxes are not the solution to move cargo to different modes. The key is to have a balanced portfolio of ‘incentives’ for good behaviour and punishment for the laggards. As such the balance from an income point of view should be neutral and not put an additional financial burden on the industry.

(6) Coordinated action. Effective action requires coordination between different levels of government: what can the EU do to facilitate this process and avoid inconsistent approaches? Many of the challenges for transport will be in the urban environment: are there specific measures the EU could take to help local authorities?

The creation of an overlapping General ‘Intermodal Directorate’ on top of the various ‘mono-modal’ Directorates within the EC was the subject of (informal) discussions under Commissioner Kinnock. Would this idea offer a World of opportunities or a Land of broken dreams? One thing is sure - it will improve coordinated actions, or better said; transport – infrastructure – logistics will *become* one overall coordinated action. After all, intermodal is not a (competitive) mode as such; it is rather a set of coordinated framework conditions and key parameters across modes, aiming at forming a sustainable, integrative and competitive (Lisbon agenda) mobility market.

At freight corridor level, there have been several positive approaches to overcome the distance between “top” and “bottom” in the past. In the intermodal sector, working groups for each [Pan-European Corridor](#) (after the Conference of Helsinki) were established, gathering an enormous amount of detailed knowledge for improving infrastructure. The EIA set up several Intermodal Promotion Centres (IPCs) in order to analyse and improve regional intermodal coordination. The Commission has tried to organise a system of Short Sea Promotion Centres.

We observe a challenge in the fact that the Commission did not sufficiently take into account the effort of these groups, which did not receive any support, particularly in the material respect. Example: the IPC in the Adriatic region (Zagreb) worked for years to create an intermodal publication using the input of national and regional governments, chambers of commerce and intermodal operators from the Adriatic-Danube region. Basically, the results present the required infrastructure and guidelines to develop a truly sustainable intermodal & logistics network in the whole Balkan area. The EIA believes that here is the potential to link the “top” with the “bottom”. The interest for these regional activities could then also have an effect in reaching common solutions with the respective governments.

Quotation from EIRAC’s Strategic Intermodal Research Agenda 2020 (SIRA) & Implementation Plan:

For 2020, the Intermodal sector will need an EU blueprint of a coordinated network of terminals, including appropriate location, number and capacity of transshipment hubs. At EU level, incentives could be given to regions that apply for transshipment hubs (measures to support education, diversification of staff).

Driving restrictions, irregular holiday slowdowns, etc. are still organised on a country by country basis. The result is that infrastructure is often underused and congested as traffic waitings to enter a particular country. There should be a common approach that maximizes use of the existing infrastructure in as many windows or time slots as possible.

(7) The external dimension. The transport sector is increasingly becoming more international. What actions in the transport sector can help to foster relations with our neighbouring countries and encourage sustainable growth there? What measures can help the EU industry and transport operators to thrive in the international context? How can the Union better contribute to sustainable global governance?

The EC and the EU transport industry should support or at least endorse **Global Intermodal initiatives**. The benefit for EU is that specific cross border challenges can be tackled at the ‘source’ or point of origin, sometimes in Asia or (Latin) America, while promoting EU sustainable concepts and expertise.

China: the intermodal sector (EIA) has been asked to assist the Chinese Railways / container terminal operators in finding partners and expertise for developing an intermodal terminal network in China (port-hinterland). EU partners are Deutsche Bahn (DB & subsidiaries), CMA CGM and others. The Chinese Ministry of Railways is actively involved.

Thailand: a national multimodal plan has been produced (2009) assisted by EIA and its partners for the Thai Ministry of Transport. The Thai authorities are very interested in the European [Marco Polo](#) programme. Our aim is to streamline intermodal policies and industrial approaches between EU and Asia.

EU-Asia: the East (Baltic) – West (China) land corridors need to be further developed. The first ASEM Transport Ministers' meeting will take place in October 2009. EU Commissioner for Transport, A. TAJANI and the Ministers of Transport from Sweden, Germany, Poland, China, Singapore, Japan, and Lithuania among others will attend. European intermodal best practices will be presented (EIA Intermodal Award) vis-à-vis the same audience. The EC is already supporting this initiative. www.asemtransport.org

USA: intermodal terminals are essential for the global transport chain. Therefore, the EIA is preparing a global gathering in 2010 (Washington) together with the Intermodal Association of North America and partners from various continents in order to discuss the requirements for an internationally compatible intermodal terminal. The global intermodal transport/supply chain is the challenge, and the terminals are the indispensable turntables.

Some other aspects including external dimensions have been mentioned above (law, ICT, infrastructure).

More information linked to subjects mentioned in this statement are to be found in 'ISIC' (Integrated Services in the Intermodal Chain) report (TREN/04/MD/S07.38573) produced by scientific partners / EIA ([go to final report](#)). The actions in this ISIC project have been grouped within a number of specific tasks:

- Task B: Improving intermodal liability and documentation;
- Task C: Harmonising technical requirements for intermodal transport equipment;
- Task D: Improving the quality of intermodal terminals;
- Task E: Certification and training for intermodal transport;
- Task F: Promotion of intermodal transport;
- Task G: Socio-economic cost-benefit analyses.

European Intermodal Association

✉ 60/21 Arenberg 44, B-1000 Brussels (Belgium)

☎ (t.) +32 2 514 56 54 · 📠 (f.) +32 2 514 67 60

🌐 www.eia-nqo.com · 📧 peter.wolters@eia-nqo.com · **Skype:** [eia-intermodal](#)

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The **European Intermodal Association** is the only European association open to all transport modes: rail, road, ocean/river, air. Its aim is to improve cooperation among the different modes of transport, since the logistics chain still has many infrastructural, technical, organisational and legal shortcomings. Therefore, this neutral organisation with more than 90 members is suitably qualified to discuss controversial subjects and propose well-balanced sustainable solutions in line with and geared towards improving EU transport policy. In this sense EIA offers its services to the EU Institutions in order to help shaping the appropriate measures.

Die **European Intermodal Association** ist der einzige europäische Verband, der die **Interessen aller Verkehrsträger** (Bahn, Strasse, Wasserstrasse, Luft- und Seetransport) **neutral** vertritt. Ziel ist eine **optimale Nutzung** jedes einzelnen **Verkehrsträgers** bei gleichzeitig **besserer Verknüpfung** untereinander. Die EIA trägt dazu bei, die fortbestehenden infrastrukturellen, technischen, organisatorischen und rechtlichen Probleme des intermodalen Transportes zu beheben. Als neutraler Transportverband mit **mehr als 90 Mitgliedern** ist die EIA besonders qualifiziert, kontroverse Themen zu diskutieren und **ausgewogene nachhaltige Lösungen** anzubieten. In diesem Sinne bietet die EIA ihre Dienste auch den EU Institutionen an, um die **Europäische Verkehrspolitik zu verbessern**.

L'**European Intermodal Association** est la seule association européenne **ouverte à tous les modes de transport** : ferroviaire, routier, maritime, fluvial et aérien. Son but est **d'améliorer la coopération entre les modes** afin d'éliminer les obstacles infrastructuels, techniques, organisationnels et légaux auxquels se heurte encore la chaîne logistique. Cette **neutralité face aux différents modes** fait de l'EIA avec ses **plus de 90 membres** un interlocuteur privilégié pour discuter des sujets controversés et **proposer des solutions équilibrées et durable** en accord avec la politique des transports de l'Union Européenne. Dans cette perspective, l'EIA offre ses compétences aux institutions communautaires pour élaborer les mesures appropriées.