

The European Voice of Freight Logistics and Customs Representatives

Brussels, 27th of February 2009

RE: Action Plan for the deployment of ITS in Europe and Proposal for a Directive laying down the framework for the deployment of ITS in the field of road transport and for interfaces with other transport modes

CLECAT represents the interests of the vast majority of EU enterprises which offer logistics, freight forwarding and Customs services both within and outside Europe. CLECAT has therefore a first and foremost interest in ITS application connected with freight transport and fleet management¹. CLECAT does obviously not deal with passengers' issues and may take an interest in such issues only as and if it is required by their interaction with freight.

The European Commission has recently released an Action Plan² on Intelligent Transport Systems (ITS) that would cover the period 2009-2014, as well as a Proposal³ for a Directive to foster the deployment of ITS in road transport. With this Action Plan, the Commission's ambition is to provide policy instruments for ITS to contribute to a cleaner, safer, and more efficient transport system. According to the Commission, this Action Plan would allow for hauliers reliable, real-time traffic information for better routing planning and to avoid delays caused by traffic jams. Professional users could also benefit from specific applications like tracking and tracing of vehicles and cargoes, especially to secure transport of dangerous goods or to track stolen vehicles.

CLECAT has examined closely the Action Plan and we came to the conclusion that it is necessary to publish the following observations that emerged, with the intention to make the reaction of a large part of the freight users available to the Commission and other parties concerned to the co-decision procedure of this Action Plan.

General comment

The Action Plan and the Proposal deal with issues that are highly important to CLECAT members, and we generally agree with the aims and general approach of the Action Plan and the

¹ CLECAT reply to the public consultation on the "preparation on the Action Plan on Intelligent Transport Systems for road transport" is available [here](#)

² http://ec.europa.eu/transport/its/road/doc/2008_its_action_plan_com_en.pdf

³ http://ec.europa.eu/transport/its/road/doc/2008_its_action_plan_dir_en.pdf

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accompanying Proposal. The need to ensure that adequate traffic and freight management as well as secure related information are efficiently and readily available throughout the EU is certainly very important.

However, we also feel that a number of problems may occur when implementing this Action Plan: it may be difficult to reconcile the various national industrial concerns in a field that may be seen by many as an industrial and development opportunity. As long as interoperability and coherence of traffic related and commercial information is ensured, CLECAT believes that aspirations to reach standardised solutions must not hamper development and business opportunities. For this reason, it is important to avoid a top down approach on standardised solutions that might hamper business development.

Instead, a bottom up and open approach with adequate facilities for exchange of information (e.g. supporting instruments to facilitate industry meetings) and best practices is a paramount factor for a successful implementation of the Action Plan.

In particular we believe that the role of the Commission and the EU institutions would be fully accomplished by setting the basic rules for the interoperability of services, whilst we are of the opinion that they should not substitute themselves to the users in terms of defining and describing the user requirements and the business processes. These latter requirements can be successfully facilitated by the Commissions services, who developed a rather noticeable and extremely beneficial activity in this direction in recent time, notably in the area of Customs. The consultations of the Trade Contact Group and its related sub-groups and working groups are a clear example of best practice in policy making and should be made treasure of in this case.

Optimal use of road traffic and travel data

CLECAT feels that the achievement of an EU-wide standardised real time traffic and travel information service is unlikely to come to fruition. Instead, actions should be focused on providing actors with standardised interfaces for this type of information to be provisioned as they deem appropriate, in the lights prescribing minimum interoperability requirements for all services. Obviously, CLECAT believes that the compatibility of the content available in these interfaces through minimum criteria is a condition *sine qua non* for such services to be appealing.

Moreover, CLECAT stresses the need to ensure the availability in these standardised interfaces of road data, traffic circulation plans, regulations and recommended routes as well as public data for digital maps. Indeed, such substantive data is highly important in order for the transport industry to be able to maintain or improve efficiency in spite of increasing congestion problems. Coming to facilitation, we believe the Commission can show the way to achieve better integrations of services, e.g. ITS might become a tool for intermodal solutions by providing real time bookings on to ferries, into terminals and railway aided road transport.

Continuity of traffic and freight management ITS services

First of all, CLECAT believes that in order to have a growing demand of businesses for the continuity of ITS services in transport corridors and in urban/interurban regions, it is essential that businesses clearly see what their advantages for sharing information are.

On the development of e-freight for the identification of goods, CLECAT would like to stress that their identification must be realised on different levels to visualize the physical goods flow electronically. Thus, it is important to keep control of goods switching between different transport modes and operators. This is the reason why CLECAT strongly support a rapid development of the e-Freight agenda and paperless transport not only into road transport and into the interface between road transport and other modes, but also into a true intermodal cross-border system for paperless freight. Moreover, we would like to draw particular attention to the need for future ITS systems for e-Freight to cover local distribution systems and the interface between such systems and long distance transport.

On this point RFID technology seems to open windows of opportunities, but one of the main obstacles is the transaction capacity, which is at the moment too slow for logistics. Some other areas of business may be happy to identify less than a 100 pieces a second, but logistics cannot.

Finally, CLECAT regrets that the Action Plan underscores the importance of the implementation of interoperability in road toll systems. The interoperability of toll devices is *per se* an advantageous trade-off for road transport and must be promoted with great strength.

Road safety and security

CLECAT is naturally and in principle in favour of all measures aimed at increasing safety and security. This being said, we would like to point out that much development is still needed as regards the deployment of advanced driver assistance systems. On that matter, we believe that it is important to have safe and reliable on-board human-machine interfaces and improvements in this area are very useful.

Regarding the development of appropriate measures concerning the impact of ITS applications and services on the safety and comfort of vulnerable road users, CLECAT would like to highlight that this will result in actions from the industry only if proof of investment payback is provided. This condition also goes for development of measures regarding secure parking places.

Integration of the vehicle into the transport infrastructure

CLECAT agrees with the importance to develop an open cabin mounted platform architecture that includes standard interfaces, but we would also like to remind the reader that these standards must be driven by business need. It is essential that the development of standard interfaces is related to a bottom up approach where businesses' needs are visualized and published in the marketplace in order for them to become known and interesting. In this area the facilitation the Commission could provide is appreciated.

On the proposed action to develop cooperative systems, CLECAT would like to stress the great number of stakeholders that should be taken into account in order for such systems to be commercially interesting and give full payback on investment: hauliers, forwarders, transport operators in various modes, customs, police, port security etc. In addition, forgetting that this is a competitive area for some of them may be imprudent and may transform expectations into delusions.

Standardisation stems in principle from a business requirement and it is one of the tools industry has given itself to cut costs and avoid duplication and resource wasting. This basic information

should be kept in mind and put in the proper light when setting the scene for these cooperative environments.

European ITS cooperation and coordination

CLECAT encourages the idea of a Proposal establishing a legal framework for European coordination on the Europe wide deployment of ITS. In this respect, CLECAT underlines the need to support ongoing business initiatives; these consist of pilot and concept projects aimed at attracting companies to these solutions.

Concerning the setting-up of a specific ITS collaboration platform to promote ITS initiatives in the area of urban mobility, CLECAT feels that thought might be given to the idea of a permanent reference platform with representatives of the Commission, Member States, Regional and Local Authorities and business. On the specific topic of urban mobility, we take the view that the Commission may wish to go one step beyond their normal stage setting (MS's, stakeholders and other consultative bodies) and use this instrument to bridge the gap that subsidiarity would inevitably create in the discussion.

Conclusive remarks

In conclusion CLECAT takes the view that this is a welcome initiative. It gives us the possibility to provide our continent with a stage on which the main players should move freely and offer their services in full and fair competition. We believe only the scene setting is needed and some facilitation can assist.

We also believe that there is no time to waste because many of the services described as ITS are available on the market and see to develop fast in the direction of proprietary networks. A good example of near-miss is the delay already accumulated in implementing Directive 2004/52 EC⁴ on the interoperability of electronic road toll systems in the Community.

According to the schedule defined in the directive, it should have already been fully implemented. CLECAT is unimpressed that this is still not the case today and urges the Commission to take the appropriate measures for its rapid implementation.

A similar delay in this domain is to be avoided. A successful implementation of the actions proposed in this Action Plan is welcome and required, if we wish logistics to maintain their level of competitiveness and efficiency. CLECAT believes that it is important to resist the temptation to focus primarily on technical solutions. Setting the stage for an interoperable environment with a bottom-up approach is the best option and what our business expects and requires.

⁴ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:166:0124:0143:EN:PDF>