

## **The European Voice of Freight Logistics and Customs Representatives**

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Brussels, 9<sup>th</sup> June 2008

### **RE: Study on a possible revision of Directive 96/53 on weights and dimensions in road transport**

CLECAT represents European logistic service providers and freight forwarders, i.e. neutral users of transport services offered by all modes. Further to the reply to the technical questionnaire on a possible revision of Directive 96/53 on weights and dimensions in road transport, CLECAT would like to complement its answer with some points of a more general nature. It is our intention to remain as usual in a strictly factual business perspective.

- With the continuous growth of freight transport volumes **the European Modular System (EMS) would represent a valuable additional freight transport solution.** This would be all the more useful since other transport modes would not be able to absorb this increase on their own, even if their capacity was enhanced.
- The road infrastructure would have to accommodate the weight and dimension features of the EMS. The European Union should set the **technical and infrastructural framework** within which the EMS could be used, bearing in mind that EMS passenger vehicles are running in our cities already apparently without any trouble.
- Logistic service providers do not see the EMS as a threat for rail and combined transport but rather as an opportunity for partnership, since the **EMS could perfectly fit within an intermodal transport chain.**
- Weights and dimensions in road transport cover a wide range of issues and the possible revision of the Directive should therefore not be restricted to the debate on the EMS. Another subject of large importance for logistics lies in the **status of 45' pallet-wide containers.** In view of the growing interest for these containers and their potential contribution to intermodal transport, all restrictions on their cross-border traffic should be lifted.