

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

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Brussels, 18<sup>th</sup> December 2007

### **RE: European Commission's consultation on motorways of the sea**

*This position is a copy of the reply to the online questionnaire used to contribute to the consultation.*

#### **1. KEY PERFORMANCE INDICATORS**

***1.1. Are you/is your organisation interested in taking part in devising a key performance indicator scheme for Motorways of the Sea and integrated Short Sea Shipping-based door-to-door transport chains?***

Yes, to provide input and comments<sup>1</sup>

***1.2. Comments on taking part in devising a key performance indicator scheme (maximum 4000 characters)***

CLECAT represents freight forwarders, logistics service providers and Customs agents in Europe. Freight forwarders and logistics service providers' core business consists in offering comprehensive and tailor-made transport and logistic solutions to their clients, the shippers. Our companies therefore hold an extensive knowledge and expertise of the supply chain, its actors and components. CLECAT would be happy to make such expertise available and contribute to devising a KPI scheme in MoS.

***1.3. Does your organisation already make use of performance indicators?***

No

***1.4. Would you or your organisation agree to use harmonised key performance indicators for Motorways of the Sea?***

Not applicable to me / my organisation

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<sup>1</sup> CLECAT's Belgian Member Organisation, CEB, holds a different view on this issue and would prefer KPIs to be dealt with within business relationships customer-provider.

### ***1.5. Comments on the use of harmonised key performance indicators for Motorways of the Sea***

Should CLECAT participate in setting up KPIs for MoS, it could then make its structure available to spread knowledge and awareness of this scheme throughout its membership consisting of some 20,000 companies in the European Union and beyond.

### ***1.6. In your opinion, what are the crucial success factors for the widespread acceptance of harmonised key performance indicators for Motorways of the Sea and integrated Short Sea Shipping-based door-to-door transport chains?***

For harmonised KPIs to be successful, a few conditions should be met:

- They should accurately reflect the needs and requests from users of MoS and SSS services
- They should be kept to a minimum
- The process to indicate the performance should be as simple and user-friendly as possible in order to avoid an administrative burden that would make the system less appealing

## **2. BENCHMARKING**

### ***2.1. Would you/your organisation be interested in helping to establish a benchmarking scheme to compare the performance of alternative intermodal transport modes?***

Yes, to provide input and comments

### ***2.2. Would you/your organisation be interested in using a benchmarking scheme to compare the performance of alternative intermodal modes?***

Not applicable to me / my organisation

### ***2.3. Comments on benchmarking scheme to compare the performance of alternative intermodal modes (maximum 4000 characters)***

A benchmark exercise could prove useful to highlight the weak points of an intermodal solution. One should however realise that such exercise is unlikely to point unexpected findings. It will most probably confirm well-known factors for often preferring single transport solutions, and in particular road transport (quality, frequency, flexibility, price...)

## **3. RECOGNITION OF EXISTING SHORT SEA SHIPPING LINKS AS MOTORWAYS OF THE SEA**

### ***3.1. Would you/your organisation be interested in EU recognition of existing Short Sea Shipping links as Motorways of the Sea?***

No, there is no/little added value of EU recognition

### ***3.2. What would be the main added value for your organisation of introducing the EU recognition as Motorways of the Sea of existing Short Sea Shipping links?***

Short sea shipping is a transport solution which presents very good results and, despite some weaknesses (e.g. repetition of administrative procedures), is about the only one able to keep up with road transport in terms of growth rate. With this in mind, CLECAT sees no added value in

introducing the EU recognition as MoS of existing SSS links. Indeed, awarding a MoS status to existing SSS links would result in substantial market distortions since commercially viable and well-established SSS links would benefit from various sources of EU funding. In addition, it would be in complete contradiction with the spirit of MoS concept, for which start-up financial assistance could only be justified because MoS links are supposed to be created *ex nihilo*.

**3.3. In your opinion, the EU recognition as Motorways of the Sea should be addressed to...**

⇒ In view of the reply to question 3.2, CLECAT would not answer this question.

**3.4. In your opinion, how should the links that deserve recognition as Motorways of the Sea be identified?**

See 3.2

**3.5. In your opinion, who should be responsible for assessing that links fulfil the Motorways of the Sea criteria?**

See 3.2

#### **4. GENERAL COMMENTS**

***Are there other comments that you would like to make on the Motorways of the Sea report not covered by the above questions?***

CLECAT supports the concept of Motorways of the Sea as an additional transport solution for logistics service providers. However, for this solution to be successful and commercially viable, CLECAT believes that a few conditions must be fulfilled:

- It should show clear topographic advantages or contribute to relieving congestion
- It must show service quality level equivalent to its competitors' (land motorways and rail connections)
- It must be developed in full collaboration with road transport since the first customers of MoS solutions should be road hauliers
- Public funding should be used to create new services where they do not exist and should be limited to the start-up phase.

As regards this last point, given the number of funds sources available, CLECAT welcomes the Commission's idea of establishing one-stop help desks to provide information on all the relevant financial programmes.

Finally, should the Commission proceed with any of the options under consultation, CLECAT is ready to contribute actively.