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CLECAT comments on the EU Low-Emission Mobility Strategy

CLECAT is the Brussels-based organisation representing freight forwarders, transport and customs related services in Europe. We represent, and are supported by 25 national member organisations, working to promote a sound and sustainable approach to transport and logistics across Europe, in support of the competitiveness of industry. Overall CLECAT represents the interests of more than 19,000 companies employing in excess of 1,000,000 staff in logistics, freight forwarding and customs services.

We welcome the EU Low-Emission Mobility Strategy as a holistic approach to decarbonisation of the transport chain, taking into account low-carbon energy use, increased efficiency and innovative, intelligent management of the transport system. In view of the European Parliament's drafting of a report on the strategy, CLECAT wishes to highlight several issues which should receive particular attention of MEPs.

- **Digital Logistics for Low-Carbon Efficiency**

The sustainability of the logistics sector is challenged by its energy consumption and greenhouse gas emissions. In order to reduce emissions, logistics operators have started to implement environmentally friendly collaborative strategies addressing supply chain integration, multi modal transport, consolidation of deliveries and reverse logistics. The implementation of such strategies frequently requires reactive and proactive coordination based on information exchanges between collaborating actors, to optimally match supply and demand for logistic resources.

We therefore welcome the Commission's recognition that digital technologies can greatly aid the efficiency of the transport system and therefore emissions reduction. Connected IT systems have a great potential in ensuring a continuous, real-time flow of information along the supply chain, enabling smart logistics planning and collaboration, so as to calculate the best solutions and the best routes in order to optimise vehicle and infrastructure use. Intelligent Transport Systems, meanwhile, offer the possibility for dynamic traffic management, which increases efficiency through reduction of traffic jams and smoothing traffic flow, therefore reducing the overall environmental impact of traffic.

Despite the progress achieved to date in the connectivity of applications, the adoption of ICT solutions by logistics operators in Europe is still not optimal. Therefore EU funded projects seek to address these issues and allow also SME's to benefit from the necessary IT at low costs. Digitally-enabled collaboration along logistics chains to improve efficiency and reduce emissions is the subject of several recently launched EU-funded projects, such as SELIS and LEARN, in both of which CLECAT is a partner.

The forthcoming Integrated Research, Innovation and Competitiveness Strategy for the Energy Union should continue to address the benefits of smart infrastructure for efficient logistics and intermodal connections.

- **Intermodality**

A carbon-efficient transport system involves seamless intermodality, allowing logistics to follow the most appropriate and efficient path in terms of time, distance, cost and emissions. CLECAT welcomes the strategy's commitment to promoting multimodal integration, which can be made possible by modernising the transport sector and completing the TEN-T network. The Commission and the Member States estimate that the development of the TEN-T network during the period 2014–2020 would require about 500 billion EUR of investments. These huge investment requirements in the transport sector should be taken into account by the current review of the MFF and by the future EU budget 2021-2027.

CLECAT calls on the Commission to move forward with modernisation of the Combined Transport Directive and to ensure that it works flexibly and realistically. This could include reviewing distance limitations so as to avoid adverse effects created by the “nearest suitable terminal” requirement. CLECAT also encourages continued effort in combating and overcoming the barriers to making intra-European wagon-load services viable and sustainable, particularly the importance of co-modal and intermodal terminals, which are crucial for the running of single wagon-load services.

- **A Balanced Pricing Framework**

CLECAT notes the Commission's intention to modernise the EU's road pricing framework in order to move towards distance-based systems, including all road users. If road charges are to be implemented, they should reflect the environmental performance of vehicles so as to create incentives for the purchase and use of cleaner vehicles, and the revenue generated should be earmarked for investment in infrastructure which improves the efficiency of the transport system.

- **Enabling Cleaner Vehicles**

CLECAT supports research and innovation to develop alternative fuels as a means to decarbonise transport and improve the efficiency of the transport system. All sustainable fuel options should be considered in conjunction with other measures, as a holistic approach combining low-carbon energy use, increased energy and vehicle efficiency, and smart demand management would greatly serve to reduce the carbon footprint of transport and logistics. The VECTO simulation tool, which allows the calculation of emissions for the whole vehicle, for a range of payloads and drive cycles, has the potential to greatly aid in the decision-making process by providing accurate, trustworthy information on emissions performance. At present, only original equipment manufacturers are intended to receive access to this data. CLECAT believes that this access should be opened up to transport buyers and operators in order to facilitate the measurement of road transport emissions and decision-making on that basis. This would also form the basis for vehicle emissions standards which would act as a spur to innovation in cleaner vehicle technology.

- **Carbon Footprinting as a driver of Smart Logistics**

CLECAT concurs with the policy recommendations made by CE Delft et al to the European Commission, which would include a combination of voluntary reporting and mandatory use of a Level 3 methodology (i.e. real-world company-specific fuel consumption data). This option has the



greatest potential for reducing GHG emissions, particularly in the long term, as it incentivises the full range of emission reduction measures and is the most accurate in estimating real-world emissions.

This is also in line with the approach of the Global Logistics Emissions Council ([GLEC](#)), which provides a Framework for such reporting without imposing a single means of doing so. CLECAT is a member of this initiative, which unites like-minded groups specialising in CO₂ calculations for various transportation modes, aiming to ensure comparable CO₂ calculations across the transportation supply chain. GLEC does not seek to replace existing tools but to ensure comparability.

To support the European Commission in its policy making, a European funded project called 'Logistics Emissions Accounting and Reduction Network' (LEARN) will accelerate emissions measurement, reporting and verification, or MRV, that will allow companies to identify reduction actions and track progress. Companies are supported through guidance, training, testing of MRV in real logistics supply chains, and setting research and policy priorities. The project partners will work with a wider network in the development of a blueprint for a label to reward businesses who proactively set the standard in improving their logistics efficiency. The LEARN project builds on and seeks to improve the GLEC Framework.

- **Coordination in Europe**

Numerous national/regional initiatives are sometimes contradictory and therefore generate distortion of competition and diminish their overall environmental impact. Individual initiatives to improve the environmental impact of urban logistics should in particular form part of regional, national and European strategic approaches, taking particular care not to impede the flow of goods into urban areas. European coordination is vital to ensure that progress made in the transport sector regarding the environment is comparable between EU countries and between the different means of transport.