

## on the revision of the White Paper on Transport: Roadmap to a Single European Transport area

CLECAT recognises the importance of EU transport policy which provides an appropriate regulatory framework, adequate investments in transport infrastructure, facilitates business to operate in the most competitive way and ensures that the required skills for private and public actors are available. If these imperatives are properly satisfied transport policy can provide the basis for efficient, sustainable, safe and secure freight transport and mobility. Therefore, CLECAT is pleased to submit its views on the Revision of the White Paper on transport. CLECAT does believe that it is important to assess the impact of previous policies and to consider new approaches based on the results of existing policy and changes in the industry and society.

European transport policy should aim to establish a system that underpins economic progress, enhances the competitiveness of the European economy and supports rather than undermines economic mobility. With this in mind, we have identified the following 5 priorities:

- **Completion of Europe's single transport market** - A priority remains the completion of the internal Market for transport. The Commission should continue to make it easier for business to operate in a single European market. This also includes initiatives to simplify the performance of administrative formalities and to reduce red tape.
- **Internationalisation** - The competitiveness of European manufacturers and service providers should be enhanced, not the least in view of the great shift of economic activity to emerging economies, reshaping global connectedness. Therefore, Europe should develop a clear strategy in the development of the main connectors to other world regions, including Central Europe, the Middle East, Africa, Asia and the US.
- **Digitalisation** - CLECAT is pleased that the European Commission has outlined its intention to cooperate with industry to promote a digital transport agenda. The deployment of innovative ICT technologies within Europe is still hampered by widely differing operational practices and standards. This does restrict the speed of implementation of main axes and hubs of the large scale EU transport network and slows down innovation.
- **Innovation** - CLECAT supports the work of the ETP on logistics (ALICE) in identifying the main challenges and opportunities in the field of transport and logistics that ask for research and innovation initiatives. This research is urgently needed, in a coordinated way, in order to reach the ambitious challenges of the EU in terms of sustainability and growth.
- **Better connectivity through sound infrastructure investments** - Logistics efficiency heavily depends on investments, first and foremost in transport infrastructure. CLECAT reiterates the need for continued cross-border infrastructure planning and investments through CEF Funding complemented by the European Fund for Strategic Investments (EFSI).

The success of this will be strongly dependent on the success of key policies aimed at market opening, international cooperation and agreements safeguarding competition in international transport and trade, and greater innovation to improve the efficiency of all modes of freight transport.

**Detailed comments:**

***Completion of Europe's single transport market***

- CLECAT calls for the swift adoption of the so-called 'fourth railway package', as a whole, retaining the principles that allow a thriving competitive rail freight market to develop with a view to increase efficiency, reliability and service quality levels.
- The White Paper on Transport identified the need to further open the road transport market in its flagship initiative 1.2.6 on road freight, which also states that 'the elimination of remaining restrictions on cabotage should be pursued.' The ultimate aim of the Common Transport Policy should be to achieve a market where registration in one Member State will allow unrestricted operations throughout the Union. The gradual development of cabotage is to be seen as the instrument through which this can be achieved, in line with further harmonisation. This will improve the overall efficiency and quality of road freight services, through increased load factors and improved economic efficiency. We recall that a study produced for the European Parliament on the costs of a 'non-Europe' noted that as the costs of remaining restrictions to cabotage is around 50 million euro per year.
- CLECAT is deeply concerned about by new burdensome reporting requirements as a consequence of new national regulations, such as the German 'Mindestlohngesetz' applicable as of 1 January 2015 within the territory of the Federal Republic of Germany for international transport. This is perceived by many as a move towards protectionism and against the spirit of a single European transport market. We fear that this may lead to a proliferation of national rules and urge the European Commission to question these developments in the strongest possible ways.
- Cross border transport in Europe should be facilitated with the European Electronic Road Toll System. Also, increased road transport security is equally needed in view of the high levels of theft and here we welcome further cooperation between Member States and an enhanced role of the ERRU register. CLECAT supports the polluter pays principle which should be implemented equally for freight and passenger transportation, in a non-discriminatory manner. Road charging schemes should be based on distance with the revenues of the charging schemes earmarked for upgrading transport infrastructure.
- The European Commission should continue to urge the EU Member States to fully implement a Single European Sky (SES) which would have significant benefits on the efficiency and sustainability air transport operations.
- The creation of the Internal Market for intra-European flights has created enormous economic benefits for businesses, consumers, shippers and the economy at large. However,

as soon as a Community carrier wishes to continue an intra-European flight to a destination outside the EU, the antiquated restrictive bilateral aviation agreements between Member States still apply. This leads to a situation where flights by a Community carrier that is approved by a third country is still be blocked by the other Member State. This is a remaining protectionist measure restricting competition. Therefore, the Internal Market for aviation should be fully liberalized to the benefit of the competitiveness of air carriers, freight forwarders and customers.

- In order to be able to operate efficiently, freight forwarders depend heavily on well-functioning ports and port services throughout the EU. Unfortunately, there are still ports and port services in the EU that do not work optimally. Today, a clear legal basis is missing to deal with some of the problems encountered in EU ports. A Ports Regulation is required which ensures open market access for port services, including cargo handling, as well as transparency in setting port charges and clear mechanisms for consultation of port users.

### ***Co-modality as a means of integrating transport modes***

A recent [OECD report<sup>1</sup>](#) on future growth to 2050 noted that in the face of shifting global trade patterns, international freight transport volumes will grow more than fourfold (factor 4.3) by 2050. Average transport distance across all modes will increase 12%. As a result, CO<sub>2</sub> emissions from freight transport will grow by 290% by 2050. So this confirms that the challenges outlined in the 2011 White Paper remain very valid.

The logistics sector is best placed to consider transport as a system rather than a collection of individual modes, and this way of thinking must be adopted by the whole transport sector and policy makers. The goal must be to make all modes and the connection between them as efficient – and with this as sustainable as possible - through infrastructure, ICT and open markets.

It should be recognized that the modal shift aims of the Commission have been very ambitious and that it has largely failed to materialise. Whereas we support efforts to shift more cargo to other modes of transport to relieve roads from congestion and reduce emissions in long haul transport, we do believe that the goal of far-reaching modal shift, and shifting road freight on distances over 300 km, should not be an aim in itself. This approach does not work in countries with a lack of rail or waterborne transport connections.

CLECAT would like to draw attention to the European Environmental agency TERM 2014 Report, “Focusing on environmental pressures from long-distance transport”<sup>2</sup>. The report addresses both *passenger* and *freight* long-distance transport. It is interesting to note that the EEA Report clearly says that “the environmental benefits of a large-scale modal shift” (from road to non-road modes) “are not precisely known and may differ considerably from that suggested by the existing average performance per mode.

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<sup>1</sup> ITF Transport Outlook 2015

<sup>2</sup> <http://www.eea.europa.eu/publications/term-report-2014>

Equally, other modes of transport such as IWW and rail freight need to step up their operations, range of available services, service levels and performance in order to provide either a viable alternative or be part of a co-modal option.

Continued efforts to introduce *new business models* (horizontal and vertical cooperation) that seek to take out 'waste' out of the supply chain (empty trucks, waiting times, paper documents) should be encouraged, in particular by removing regulatory bottlenecks and more investments in R&D.

EU policy should aim for competitiveness **and** for sustainability. This is not a trade-off; the two go hand in hand in support of more resource efficient and sustainable transport.

### ***Digitalisation and Innovation***

Dematerialising the transport and accompanying documents should be promoted as it leads to further cost-reductions while also improving the speed of delivery, the traceability and reduces administration paperwork. Other global industry associations - like IATA for aviation with its 'e-freight' project – have taken the lead of e-documents projects and work closely with states. The EU should support those projects as much as possible. FIATA, the international organisation of freight forwarders, has launched a project to make the FIATA Multimodal Bill of Lading available in electronic format, which is supported by CLECAT, but which now needs further support from all stakeholders.

It should be noted that the EU is the best connected region in the world as the world's largest exporter and biggest trader in goods. But even in Europe much remains to be done. A recent study by the Dutch research organisation TNO identifies the costs of a lack of interoperability in multimodal transport exchange in Europe as EUR 12 billion per year. CLECAT would welcome further efforts of the Commission to facilitate and achieve integration which is hampered by a lack of common processes and common standards for interoperability.

In order to unlock the potential of IT solutions for reporting and clearance, governments should link robust IT solutions for tracing and tracking allowing visibility of the supply chain to simplified border management and regulatory processes, e.g., customs and security risk assessment for inbound and outbound cargo before the cargo arrives. Governments should without further delay upgrade their ICT systems to enable a more efficient Business-to-Administration and Administration-to-Administration data flow for the benefit of both them and the business. Access to real-time public data should be made easier as it could bring efficiency gains to the business. With the support of innovation, network integration will need to evolve from static attributes of services and equipment such as interoperability, to dynamic services allowing for resilience and responsiveness to be developed (synchro-modality).

### **In conclusion**

The path to increased sustainable freight transport rests largely with the ability of industry to optimise its transport and logistics requirements in line with the wider supply chain needs. In doing so, legal, technical and operational barriers need to be removed and incentives for speedier development, investment and implementation of more sustainable technology and measures may sometimes be required. This is what EC transport policy would do best to focus on.



**About CLECAT**

CLECAT is the Brussels based organisation representing the interests of freight forwarders, transport and customs related services in Europe. Neutral towards transport modes, European freight forwarders and Customs use road, rail freight, sea, air, inland waterways and intermodal transport. They make extensive use of IT systems, dedicated terminals and warehousing to respond to the needs of their customers.

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See also [MANIFESTO](#) for Unlocking the Transport Single European Market in Support of an efficient and sustainable EU Freight Transport Policy.