
The European Voice of Freight Logistics and Customs Representatives

Brussels, April 27th 2007

RE: CLECAT contribution to the European Commission's public consultation on the preparation of a Green Paper on urban transport

With this contribution, CLECAT would like to give complementary comments to its reply to the Commission's online questionnaire on urban transport.

About CLECAT

CLECAT is the European Association for Forwarding, Transport, Logistic and Customs Services. CLECAT was established in 1958 in Brussels, where it represents today 28 national organisations of European multinational, medium and small freight forwarders and Customs agents, thus representing the largest and oldest institution of its kind. Freight forwarders and logistic service providers master the entire supply and value chain on behalf of their clients. Their logistic solutions satisfy both production and consumption, both supply and demand and make sure their expectations are satisfied, ensure that goods move from the point of origin to reach their final destination at the right place, at the right time and in good shape. For this purpose, they utilise the entire and complex logistic infrastructure with a totally unprejudiced and cost-efficient approach.

Freight forwarders and logistics service providers do not privilege any means of transport or transport infrastructure as such, although some may own a great many equipment and infrastructure.

Freight forwarders / logistics service providers & urban transport

Freight forwarding and logistics operations consist in a large variety of transport and transport-related services¹. A sizeable part of these services are performed in urban areas through freight deliveries and collections. Access to and mobility problems in urban areas therefore directly impact upon the freight forwarding business.

The main problem: congestion

CLECAT recently had the opportunity of addressing the problem of congestion and its consequences for logistics². There, CLECAT explained that "*Central areas of almost all EU cities are plagued by congestion, which is made worse by lack of respect for driving and parking rules. Distribution in downtown areas is a sore point, some restrictions and constraints aimed at*

¹ See CLECAT/FIATA official description:

http://www.clecat.org/index.php?option=com_content&task=view&id=42&Itemid=9

² See : <http://www.clecat.org/dmdocuments/SR002OSECR061213congestion.pdf>

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mitigating the impact on the public in fact often contribute to creating greater congestion by concentrating deliveries on certain given times³.

As regards factors which generate congestion, it is impossible to avoid noticing that commercial vehicles are often obliged to stop in forbidden areas or in areas where they may cause obstruction, because either freight vehicles parking areas are not identified and reserved, or they are invaded by private vehicles where they exist. Enforcement of rules is unfortunately not uniformly effective in the Union, which is creating great problems for urban logistics.

The effects of congestion on logistics are very substantial. As explained in the paper, *"freight forwarders and logistics service providers maximise the use of available infrastructure in order to offer the best solution to their clients. Despite these "smart logistics services", congestion problems are present and growing. The two most obvious effects of congestion certainly are delays and costs. Delays are all the more harmful since our transport system is governed by "just in time" deliveries. Because of the structure of the supply chain, there is a "domino effect" that affects all the operators. Problems of this kind may also have far-reaching repercussions for trade and industry"*.

What solutions? The way forward...

We understand that the difficulties linked with the subsidiarity principle applicable to urban transport normally leave limited room for EU action in this field. However, there seems to be some consensus among Member States that despite this institutional difficulty an EU approach would be appropriate. Indeed, in spite of local specificities, most urban areas in the EU face the same mobility problems and challenges. In addition, bearing in mind that urban mobility produces some 40% of all CO₂ emissions from road transport and up to 70% of other pollutants from transport³, any policy aiming at reducing these figures should have an EU scope.

CLECAT could mention the following actions that could have a positive impact on urban mobility in the EU:

- **Better use of the 24 hours of each day.** encourage deliveries and collections at off-peak times. One should however point out that this solution would entail substantial changes in the work methods of many actors in the supply chain (forwarders, carriers, shippers, workers etc.);
- **Grant delivery and collection vehicles dedicated lanes,** whereas this may look a far fetched expectation, it does make sense, if one takes one extra moment to analyse the issue. Freight vehicles, unlike private cars and own account transport, have a social function and are no more and no less than the "bus for goods" as public transport is the "bus for people/passengers". In addition freight vehicles in urban areas proceed less briskly than private vehicles and separating the two flows may improve both performances and cure, at least in parts, road congestion;
- **Rewarding system favouring the use of environmentally-friendly / energy-efficient vehicles.** one could for instance imagine a system whereby purchase of hybrid vehicles could be promoted through small subsidies or tax rebates; an additional idea, which could seriously entice operators to renew their fleet with less polluting vehicles, is to allow hybrid commercial vehicles or commercial vehicles of superior EURO class to share public transport lanes with taxis and busses;
- **Encourage greater use of public transport** in order to limit the number of private cars, which represent some 75% of urban daily trips by private motorised modes according to UITP⁴.

³ Source : European Commission, DG TREN

⁴ Comment made at the European Voice event 'Transport and the energy review: Sustainable mobility in Europe' organised on March 27th 2007 in Brussels

With reference to the online questionnaire, Clecat has sent its replies. However, due to its nature, we believe it is more appropriate for Clecat to additionally provide a guiding commentary, which might help the services of the Commission to understand the reasons for each individual reply:

- Question 3.3 - different replies might be required for different items. For example, cultural problems may indeed detract from a more sustainable and efficient mobility, but the idea of cultural problems should be itemised and specific aspects should be targeted with specific actions. A lot could be done with better civic and logistics education in Europe.
- Question 4.1 – the reply should hopefully be yes, but, if we understand correctly, this is a first attempt to coordinate at EU level urban transport policy, which is in principle covered by subsidiarity.
- Question 5.3 – we suggested identifying common criteria for complex measurements, for example when dealing with complex concepts such as congestion. Comparable data could benchmark bottlenecks and complicated problems, with accurate mapping at EU level.
- Question 6.2 – It is assumed that local authorities are capable of defining their financing needs and of putting together financing packages with the expert assistance readily available on the market
- Question 6.3 – any measure intended to put pressure on the market runs the risk of being ineffective or of producing additional and unwanted costs. New technologies, intelligent transport solutions can penetrate the market as quickly and effectively as they are useful to solve problems. Money can be profitably used to stimulate research activities, rather than promoting gadgets. Only rarely and concerning large scale projects (e.g. GALILEO) may ad hoc launching and implementation support actions be required.
- Question 8.2 – Our reply is positive on condition that actions are specific and well targeted.
- Question 8.3 – Private sectors partners spend money on these actions but they do not always give information about it.
- Question 9.1 – Whereas sustainable transport policy seems well inbuilt into the public image of urban public transport providers, a number of other public services deployed in cities and towns, such as garden services, garbage collection, maintenance of signs and lighting, etc. are often less eco-friendly.
- Questions 9.2 to 9.6 and 10.3 to 10.6 – we find these questions quite obvious, but we understand there could be a background reason. If the reason is clear the answer would be easier.
- Question 12.1 – Clecat takes the view that the result is not in line with expectations. Measures taken by local authorities often privilege private cars over commercial traffic and measures such as banning delivery vehicles from city centres for large parts of working hours does nothing but contribute to making congestion worse in many a circumstances.
- Questions under paragraph 13 – all these measures might be effective or counterproductive according to a series of parameters and should be analysed in depth. In general granting preferential lanes to commercial vehicles could help, as we have said already. Consolidated delivery schemes may or may not help according to the situation. It must be said that their results (when they have been tried) are very debatable and this idea looks very contentious to many operators in view of the fact it might trigger distortion of competition.

CLECAT would be ready to make its structure and membership's expertise available to further investigate these solutions and their implementation, as well as any alternative, ideas and suggestions that make business sense, while being mindful of more sustainable logistics in urban areas.