

The European Voice of Freight Logistics and Customs Representatives

Brussels, 14th of March 2008

RE: Commission's Green Paper – Towards a new culture for urban mobility

CLECAT represents the interests of the vast majority of EU enterprises which offer logistics, freight forwarding and Customs services both within and outside Europe.

CLECAT participated in the debate that led to the adoption of the European Commission's Green Paper on Urban Mobility. We provided a reply to the online questionnaire¹, together with additional comments². As explained in our previous comments, a sizeable part of forwarding and logistic services are performed in urban areas through freight deliveries and collections. Logistics are people's business and people's service, logistics happen where people are requiring the service, in growing proportion to the degree of development of the reference area. Access to and mobility problems in urban areas therefore directly impact upon the freight forwarding business and logistics. We can even venture stating that freight services are all the more required where the largest conurbations make it more difficult for private mobility to remain the best option. In so doing they offer a significant contribution to the reduction of externalities³.

CLECAT agrees that although urban mobility has a strong local character, a number of problems and challenges are common to most cities in Europe. A European framework and strategy would therefore be supported, in full respect of the subsidiarity principle.

The situation in most urban areas in Europe is unfortunately similar and can be summarised in one word: congestion⁴. Generally, congestion stems from an infrastructure, the development of which has been slower than that of traffic. This reason is also valid in urban areas but one cannot avoid noticing that the situation is often made worse by the fact 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.

¹ <http://www.clecat.org/dmdocuments/PP009aSECR070427ReplyQuest.pdf>

² <http://www.clecat.org/dmdocuments/PP009OSECR070427UrbanTransport.pdf>

³ Anecdotic quotations affirm that one truckload into a distribution centre is equivalent to 600 private cars driven out of it by consumers going shopping. Clecat is not in a position to confirm or deny this piece of information, which is provided only to better explain the statement made in the above text. More interesting references can be found in the following study: <http://transweb.sjsu.edu/mtiportal/research/publications/documents/Freight.htm>
Evidence that a delivery vehicle is equal to nine shoppers' cars can be found in the following study: <http://statistics.defra.gov.uk/esg/reports/foodmiles/annex4.pdf>

⁴ see also: <http://www.clecat.org/dmdocuments/SR002OSECR061213congestion.pdf>
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We should like to add that the issue of delivery vehicles should not be dismissed superficially. We believe there are two areas that are not sufficiently studied, when we read literature on this topic: the area of motivations and behavioural inertia. Taking the example of parking infringements, it is not difficult to see that a driver who must deliver a package (sometimes heavy) has the strongest motivation to infringe parking rules and (because he/she thinks it will be done quickly) a reasonable expectation to do it without being sanctioned. When it comes to private cars the motivation to infringe rules (by for instance parking in areas reserved for commercial traffic) is related to behavioural inertia, rather than real need. We believe more research on these mechanisms should be made and lessons should be learned from it, which could provide guiding assistance in devising corrective measures.

Urban mobility: a need for both people and goods

CLECAT's interest and expertise lays first and foremost in freight transport aspects. As the Green Paper rightfully points out, one of the challenges of urban mobility is to 'reconcile freight and passenger transport interests'. More than anywhere else, cities are where both freight and passenger transport aspects are to be dealt with commonly and without ignoring the impact that one has on the other. In this respect, it should be recalled that both are equally necessary to the very existence of any city. If goods cannot access cities, shops are empty. It is therefore important not to oppose freight and passenger transport but instead to find the best balance in terms of access to cities.

When assessing the possibilities offered to address congestion in urban areas, one should keep in mind that the situation is not the same for goods and people. Whereas in both cases, congestion stems from the use of vehicles in/to access cities, their alternatives are quite different. In order to access cities, people can use trains and public transport to access city centres. Once in the urban area, they can move with public transport, scooters, and bicycles or just walk. Goods, on the other hand, do not enjoy such variety of possibilities. They cannot sprout legs and walk. The only way for goods to reach their final destination is to use a delivery vehicle. One can look at Venice, which is offering the example of a unique situation in the world a teaching lesson. The total absence of cars and vehicles does not seem to seriously hamper tourists or inhabitants in moving freely in the city, but logistics in Venice city and deliveries have very special costs and features.

This distinction is important when devising tools to address urban freight mobility. These tools can be classified in two groups:

- Measures aimed at improving the environmental performance and energy efficiency of delivery vehicles
- Measures allowing an optimisation of space use and allocation and, consequently, logistics planning in urban areas

The first group of measures should enable a general technological upgrading of the fleet of freight vehicles operating in urban areas so as to reduce their individual impact on people's welfare and on the environment. The second group should enable LSP's to optimise deliveries and collections in urban areas, for instance thanks to an increased time flexibility or privileged use of specific transport infrastructure.

Measures on passengers' transport, on the other hand, go beyond CLECAT's scope of expertise. This said, our sector welcomes and supports any measure or tool aiming at decreasing the number of private cars in cities by promoting the use of alternative mobility, such as public transport, walking and cycling...

In view of the above and based on comments already provided, CLECAT would like to provide its views and suggestions on every question that is relevant to the forwarding and logistic sector.

TOWARDS FREE-FLOWING TOWNS AND CITIES

1- Should a "labelling" scheme be envisaged to recognise the efforts of pioneering cities to combat congestion and improve living conditions?

Labelling could prove a visible tool in order to promote the exchange of best practices in the field of fight against congestion. One should however pay attention to award a label on the basis of results achieved in terms of both freight and people mobility and possibly not one at the expense of the other.

However, finding the "right" measures across the EU could be difficult as each city has its own characteristics and so has its infrastructure, e.g. the success of a congestion charge depends on the layout the road network has (raster or radial etc.). In a radial system there are less alternative routes and congestion charging can be applied more easily, while in a raster network more costs have to be taken into account. Thus a labelling scheme has to find objective criteria on how to identify "successful" cities.

2- What measures could be taken to promote walking and cycling as real alternatives to car?

Although this question is beyond CLECAT's scope, common sense commends that the first condition for the promotion of cycling in cities consists in the presence of a developed and safe cycling network. The same idea goes for walking, i.e. a developed pavement network and the presence of pedestrian areas.

To promote walking and cycling you need to invest in a separate infrastructure. It is recommendable to separate and prioritize pedestrians, bicyclists, public transport and freight transport from individual transport.

Another idea would be to introduce or enlarge the possibility of bicycles for rent, as it is already the case in major cities like Copenhagen, Berlin or Brussels.

In principle there have already been many EU projects, best practice brochures and conferences on the topic, so there is not necessarily a need for more actions, but rather enforcing the ones that already exist.

3- What could be done to promote a modal shift towards sustainable transport modes in cities?

The experience in freight transport shows that measures aiming at forcing a modal shift have very little chances of success unless other modes offer equivalent alternatives in terms of overall efficiency.

TOWARDS GREENER TOWN AND CITIES

4- How could the use of clean and energy efficient technologies in urban transport be further increased?

As far as public transport is concerned, CLECAT would support the mandatory inclusion of energy efficiency and environmental criteria in public procurements for the acquisition of new vehicles.

As for freight transport, one could imagine two sorts of incentives:

- Financial incentives to upgrade operating fleet with vehicles using clean and energy efficient technologies: these incentives could take the form of tax rebates, 0% loans, small subsidies, such as rebates on parking fees and tolling systems...

- Operational incentives the aim of which is to facilitate operations for clean and energy efficient vehicles: these vehicles could be granted dedicated lanes or allowed to share public transport lanes with taxis and busses. Such possibility has already been implemented, for instance in Gothenburg (Sweden) where it has brought successful results without impeding on public transport.

In addition, one could mention the more substantial role that trams could play, where the infrastructure allows it. For example, last year the construction of a fast tram line (2.8 km) in the city of Gdansk (Poland) decreased travel time from over half an hour to 6 minutes eliminating 2 bus lines and reducing considerably road congestion and CO2 emission.

5- How could joint green procurement be promoted?

The dissemination of best practice in load optimisation can offer a contribution. For example in Stockholm, the city government has introduced a policy where all transport to and from their own sites (schools, kindergartens, administrations etc.) is tendered to one logistics company for a stated period. All suppliers deliver their goods to the logistics terminal outside city centre, and the tendered company then distributes in their system with best vehicle technology etc. This cut weekly deliveries by up to 80% with the energy and emissions savings. Such practice could be adopted by most public administrations, who could tender their procurement introducing environmental elements in their selection criteria.

6- Should criteria or guidance be set out for the definition of Green Zones and their restriction measures? What is the best way to ensure their compatibility with free circulation? Is there an issue of cross border enforcement of local rules governing Green Zones?

CLECAT is of the opinion that definitions have to be applied in a uniform and harmonised way all over the Union. What defines a Green Zone in Munich should be compatible with a Green Zone in Madrid and elsewhere in the EU. Studying new rules and regulations takes time and adds to the duration of a delivery, thus increasing congestion, delivery time and costs. The differences in local restrictions and circulation rules are identified as one of the main difficulties in urban logistics planning.

7- How could eco-driving be further promoted?

As far as professional 'freight transport' driving is concerned, eco-driving could be promoted through subsidised training programmes. In the future, one could also imagine an 'eco-driving module' in the training and education schemes of professional drivers. This being said, hybrid technology provides so far the best example of cutting emissions in urban areas and can work in combination with eco-driving.

TOWARDS SMARTER URBAN TRANSPORT

8- Should better information services for travellers be developed and promoted?

Although this question is beyond our scope, common sense commends to reply positively insofar as information on traffic enables both private and professional travellers to anticipate jams and take alternative itineraries. On the other hand, it has to be kept in mind that a situation of "perfect" (but one way only) information could be counterproductive and create "the perfect storm effect", in the sense that IT systems would become unable to predict jams as exactly as expected. When everybody has total information it becomes increasingly difficult to contain mobility deviation. If all users know there is a traffic jam on a given routing, everybody will then try the next "perfect route" creating congestion on it before it can be managed. This aid can work wonders only if it is assisted by an interactive option which feeds information on users'

choices in real time back to the system, which in turn would make the cost of such a system probably very high.

9- Are further actions needed to ensure standardisation of interfaces and interoperability of ITS applications in towns and cities? Which applications should take priority when action is taken?

Logistics service providers are big users of ITS applications. Indeed, technological solutions are now fully part of logistic services and therefore one of the elements of logistics competitiveness and excellence.

The generalisation of *"integrated systems that combine intelligent route planning, driver assistance systems, intelligent vehicles and interaction with infrastructures"* could indeed be useful in logistics planning. A prerequisite is however that these systems are interoperable in order to avoid a multiplication of investments in similar yet different systems. Interoperability does not prejudice cutting edge competition, whilst at the same time promoting "virtuous" behaviours.

One should however temper excessive optimism regarding the effects of such systems on congestion. Indeed, it must be stressed that time windows for deliveries and collections tend to be rather limited and too often concentrated on a few hours in the morning. This gives little flexibility to LSP's and results in a concentration of 'freight traffic' at times when congestion is already quite noticeable. CLECAT has already indicated at numerous occasions that the 24 hours of the day should be better used in order to 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.).

In addition there are already several cities, which have variable traffic signs and recommendations for alternative routes in case of congestion. This information should be available for logistic service providers, who should be identified as first and foremost interest group of users. This is only possible, if the interfaces are clearly defined, so that the systems can access the communication system according to their expected need. In this way professional users may find an additional incentive is availing themselves of "state of the art" mobility tools

10- Regarding ITS, how could the exchange of information and best practices between all involved parties be improved?

The Green paper mentions the possible creation of an Observatory on Urban Transport. Should such entity be set up, CLECAT believes that it could also serve as a platform for the exchange and promotion of best practices on all aspects of urban mobility, including ITS. This being said, we believe first and foremost mobility tools will stand a chance to make a difference, if they are perceived as a business working in view of a business target. One way or another this frame of mind reverses the perspective of mobility tools being developed mainly, if not only, for public use.

TOWARDS ACCESSIBLE URBAN TRANSPORT

11- How can the quality of collective transport in European towns and cities be increased?

This question is beyond CLECAT's scope.

12- Should the development of dedicated lanes for collective transport be encouraged?

Referring to our reply to question 4, we would support the development of dedicated lanes for collective transport and together with the possibility for clean and energy efficient freight vehicles to use these lanes.

13- Is there a need to introduce a European Charter on rights and obligations for passengers using collective transport?

This question is beyond CLECAT's scope.

14- What measures could be undertaken to better integrate passenger and freight transport in research and in urban mobility planning?

Too often, freight operators find themselves compelled to cope with inconsistent results of urban mobility plans, whereas they were often not even involved in the development of such plans. In order to avoid such situations, it is therefore of the utmost importance to integrate freight aspects into urban mobility planning. A popular expression is "freight does not vote", which is true, if one only perceives one-to-one connections. Freight however can backfire in kind if it is underestimated, because it is driven by consumers' demand and is ill-constrained by regulation. We believe that freight representatives must be regarded by politicians at the same level as the representatives of passengers' interests, simply because they have at least the same stakes in the discussion. Representatives of the freight transport industry must be properly consulted and involved at all times. To this end, the EU could encourage or even require consultative committees to be set up in order to ensure that freight interests are accurately taken into account when devising urban mobility plans.

There is a lack of models for integrated freight and passenger car traffic. It is not effective to make plans for passengers only, because the question how the roads are to be upgraded and extended is related to the question which vehicles are using it and will be using it in the years to come. To get a better understanding the EU should fund research to better understand land use, space allocation and flows of traffic for freight and passengers in the next 10-20 years.

15- How can better coordination between urban and interurban transport and land use planning be achieved? What type of organisational structure could be appropriate?

The need for coordination between urban and interurban mobility is clear. Some examples can be found in a number of metropolitan areas in Europe, which provide both best practice examples and lessons to be learnt. Indeed, local mobility plans must be harmoniously integrated so that, for instance, traffic relief in one area does not result in additional congestion in a neighbouring area. CLECAT is not in a position to recommend specific organisational structures at this point in time, but would be pleased to provide comments on future proposals, if this is considered interesting. A legal obligation of coordination between local/regional/national competent authorities would be supported, if assisted by the publication of a set of EU wide guidelines on mobility coordination.

TOWARDS SAFE AND SECURE URBAN TRANSPORT

16- What further actions should be undertaken to help cities and towns meet their road safety and personal security challenges in urban transport?

This question goes beyond CLECAT's scope, with the exception of road safety, which is in our opinion a stand alone topic.

17- How can operators and citizens be better informed on the potential of advanced infrastructure management and vehicle technologies for safety?

Regardless of the fact that it is debatable whether it is the EU's task to inform operators and citizens on advanced infrastructure management and vehicle technologies, this could be done through awareness-raising campaigns, advertisements, local newspapers, official journals,... We would however prefer this activity to be driven by those who have an interest in promoting their activities. There is a risk to misconstrue commercial interests as public policy issues.

18- Should automatic radar devices adapted to the urban environment be developed and should their use be promoted?

CLECAT is not in general in favour of public promotion of privately owned technologies, which can probably better promote themselves, if they are effective.

19- Is video surveillance a good tool for safety and security in urban transport?

This question goes beyond CLECAT's scope, if it presumably referred to passengers' transport.

CREATING A NEW URBAN MOBILITY CULTURE

20- Should all stakeholders work together in developing a new mobility culture in Europe? Based on the model of the European Road Safety Observatory, could a European Observatory on Urban Mobility be a useful initiative to support this cooperation?

Such body could prove useful, mainly for the dissemination of best/worst practices in all aspects of urban mobility, and not safety and security related issues (see reply to question 10).

One could also point out that if the exchange of best practices is definitely to be encouraged, information on 'bad' examples could also teach some useful lessons. Without resulting in a 'shame and blame policy' these unsuccessful examples would point out inefficient solutions and undesired effects, which would equally contribute to the overall improvement of urban mobility in Europe.

CLECAT recommends that freight and passengers' stakeholders are consulted and treated on equal footing.

THE FINANCIAL RESOURCES

21- How could existing financial instruments such as structural and cohesion funds be better used in a coherent way to support integrated and sustainable urban transport?

As CLECAT has stated on numerous occasions in the past, it is necessary to improve infrastructure. Only increased infrastructure financing and improved infrastructure maintenance can help to battle congestion. One could mention the extension of bicycle lanes, bus lanes (which could be used by freight traffic as well), additional parking areas, etc. Structural and cohesion funds could be used to achieve the aim of improved infrastructure on the one hand. On the other hand they can play also a significant role in promoting research in innovative solutions. In this respect and in consideration of the somehow unsatisfactory level of out-of-the-box thinking that was observed so far, it might be an idea to establish an additional criterion in the evaluation of studies and projects, for example a (lateral) divergence from mainstream index.

22- How could economic instruments, in particular market-based instruments, support clean and energy efficient urban transport?

Please see our reply to question 4 regarding the use of financial support to upgrade operating fleet with cleaner and more energy-efficient freight vehicles. These measures could be combined with operational incentives.

We may even feel tempted to add an unconventional observation: the price of oil seems steadily set on its way upwards. This is making all forms of alternative energy much more appealing than in the past. This is probably an economic disruptive element that will create new business patterns. It also will create favourable conditions for alternatives especially where alternatives (e.g. based on electricity) are viable. Urban areas seem to be best placed in interjecting these winds of change.

23- How could targeted research activities help more in integrating urban constraints and urban traffic development?

This question goes beyond CLECAT's scope. We do not believe it is within our remit to provide such input, but we would be pleased to cooperate in the evaluation of the proposals made by research institutions.

24- Should towns and cities be encouraged to use urban charging? Is there a need for a general framework and/or guidance for urban charging? Should the revenues be earmarked to improve collective urban transport? Should external costs be internalised?

Considering the existing level of charges levied on transport in general one can ill be persuaded that "encouragement" is necessary at all. The real question is how revenues are employed. A number of European cities are applying urban charging schemes with varying results. In addition, the current risk is that more and more cities devise their own charging system, based on their own criteria and own technology. Such a multiplication of differing systems would have very negative consequences for logistics and transport companies. In this respect we are of the opinion some guidance to achieve a more harmonised charging scheme is beneficial.

Charging is however not the panacea to urban mobility problems. It also has to be kept in mind, that different systems need different solutions. If you have the objective to fight congestion you have to set a system, which keeps individual traffic out of the inner city. If your objective is to achieve infrastructure funding by earmarking revenues your interest might be the opposite.

Besides the fact that CLECAT is in favour of earmarking in general, the principle of earmarking is all the more adamantly required when addressing congestion by pricing schemes.

This being said, levying charges – especially if not earmarked – does not happen without consequences. The first immediate consequence is to discourage users who have an alternative. If users do not have an alternative they pay and charge in their turn these additional costs either in their own invoices and charges (if they are professional) or in their HR relations (if they are part of the workforces).

From a freight point of view, two reasons can be given to use caution. First, goods need to be delivered/collected in cities, whether or not a charging system is in place. The risk is therefore to create just an additional freight cost (eventually borne by the consumer) without curbing freight mobility. Secondly, time charging can ignite a perverse effect in concentrating traffic on different given times, i.e. shift the timing of congestion rather than curing it. CLECAT therefore believes that urban charging should always be earmarked (possibly to provide free urban and suburban transport), and could be encouraged only if and where the charges can be used to provide free public passengers' transport.

This said, cities cannot be prevented from deciding whether or how to implement a charging system in the current EU legal system. In such case, CLECAT advocates that a framework be set up at EU level, in particular as regards:

- Interoperability of the systems
- Reward of environmentally-friendly and energy-efficient vehicles
- Earmarking of revenues to urban transport, i.e. both public and freight transport (specific parking spaces, subsidies for the acquisition of clean vehicles...)
- Eventually to provide the incentive to a free public transport system in urban areas.

25- What added value could, in the longer term, targeted European support for financing clean and energy efficient urban transport, bring?

The answer seems to be in the question... European financing of clean and energy efficient urban transport would decrease the impact of transport externalities, a common objective for the industry, decision-makers and citizens.

CONCLUSION

Clecat need reiterate once more that mobility conditions have driven consistently in the opposite direction of efficiency, despite the noticeable technological improvements we have seen in recent decades.

This is mainly due to greater congestion. Congestion in urban transport is one of the major problems in urban traffic. It contributes significantly to increased transportation costs and longer times and less efficient logistic distribution. Especially at peak hours in the morning and the late afternoon people can be stuck in traffic for a long time. Logistic service providers face a difficult situation, because they often have to deliver their goods in the morning, i.e. at peak times. In so doing they compete with passengers and add to the congestion.

A shift from individual passenger traffic to public transport may be one of the goals. This would help freight traffic consistently, whilst being of valuable service for the community. Goods have to somehow reach the shops or ultimately consumers, who are now predominantly living in the city, or even simply come to the city for their shopping. There is no alternative to road delivery for the last mile at the moment, there is therefore not much leeway to hamper or ban freight traffic from urban roads, quite the contrary.

In order to achieve a hopefully significant modal shift in passengers' mobility the system of urban transport has to be enhanced and maybe rethought. Passengers need incentives and concrete benefits, if they are to change from the most convenient method of transport, which is their own car, at least when they actually can do it without too much aggravation. Carrots would work probably better than stick in this errand.

We can see various actions, which the Commission could take, which would then benefit urban transport as a whole and freight transport as an essential part of it. In this pursuit the appropriate legal instruments should be use to suggest or promote, amongst others, the following measures:

- Better service hours for freight traffic (possibility of 24 hour delivery)
- Use of dedicated lanes (bus/taxi) for environmentally friendly/energy efficient freight transports
- Promoting a switch from individual car transport to mass transport (subway, bus) or shared transport (car-sharing, in town and in a network at national and continental level)
- Further development of infrastructure (cycling lanes, ITS, public transport, etc.)

- Extensive deployment of interactive intelligent transport systems
- Interoperable charging systems at EU level
- Earmarking of infrastructure charging revenues with the aim to increase public transport efficiency
- Reducing or cancelling the cost of urban and suburban public transport for direct users