

The European Voice of Freight Logistics and Customs Representatives

Brussels, September 8th 2009

RE: Communication from the Commission on "A sustainable future for transport: Towards an integrated, technology-led and user friendly system"

CLECAT is the reference organisation at EU level that represents the interests of logistics at large, freight forwarding, transport and Customs + related services. As a matter of interest CLECAT was actively involved in the work that led to the publication by the Commission of its Communication on the Future of Transport. Indeed CLECAT participated therein the 'Focus Groups' debate set up by the Commission. The director, Mr Sorgetti, was in charge of reporting on the Freight section of the High Level Stakeholders' Conference on 9-10 March 2009.

CLECAT welcomes the Communication on the Future of Transport: the preparatory work carried out by the Commission's services led to the raising of some very good points and the concrete policy actions that are actually needed will be the eventual conclusion of this excellent work. In particular we would like to congratulate the Commission for the wording of the 1st phrase of point 38 of section 3 of the Communication, which reads as follows:

"The goal of the European Transport Policy is to establish a sustainable transport system that meets society's economic, social, environmental needs and is conducive to an inclusive society and a fully integrated and competitive Europe." Achieving these high level objectives requires a combination of collective efforts that will show in the next decade what the mould of our community is.

At this point in time we would therefore like to provide the Commission and the public with some additional input on what in our view should be included by the Commission in the forthcoming 2010 white paper and in other future proposals. Our comments will be focussed on our scope of activity, i.e. freight transport and may interject passengers' interest as and when this is necessary to complement the overall picture. This is the reason why many of the good points made in the communication (such as point 43 in section 4) will go without specific comments.

On the evolution of the transport market

First of all, CLECAT Members agree with the Commission that "any intervention on the transport sector must be based on a long-term vision for the sustainable mobility of people and goods" and "because policies of structural character take long to implement and must be planned well in advance." When considering transport in a long term perspective, the Commission should also realise that the transport sector will face ever more testing challenges, as the transportation demand will inevitably increase, whilst the price of transport will have to be managed wisely in order not to become a negative element in EU competitiveness.

Such challenges must be met by our society with thoughtful policymaking and the Commission can significantly contribute to it by promoting **better** transport in future, rather than less transport as some professionals have done in the past. Indeed, it is important that policy makers realise that mobility is both a right of the citizen and a source of revenue, freight transport in particular is unavoidable in a society that does not decline. These present and future issues need to be adequately addressed through effective policy actions at EU level.

Transport operators cannot suddenly change business behaviour because their paradigms are driven by market forces and competition. This situation will not change in the future. This means that behavioural changes should be encouraged at the level of consumers' behaviour rather than transport operators'. Social marketing is a tool that would greatly influence consumers' behaviour (for instance working with slightly longer lead times), which would be definitely more effective than putting a higher price tag on freight transport. In any case, emphasis on customer behaviour is also more judicious than expecting to impose changes in logistics, because the customer decides eventually which kind of service he/she wants. The customer could become a more visible actor in the supply chain and proactively require "sustainability" in the services it receives.

We should realise that hardly anything will be the same as it was before the economic crisis, we need to move forward and reconsider how we want our economic growth to be. This current economic crisis represents a chance for the logistics sector to accelerate its preparation to the future challenge, with changes in the organisation and the development of new cooperative logistics patterns:

- More focus will probably be put on service reliability rather than a fast JIT (Just in Time) delivery;
- The importance of buffer warehousing will probably increase;
- Cooperation with Railway Undertakings, especially in the Single Wagon Load and the sidings areas should be further encouraged, if we wish rail to be a real freight service alternative;
- The interoperability of technology and an innovative way to look at it will be key elements to increase efficiency;
- The relationship between freight and passengers in sharing infrastructure will have to be seriously reconsidered: can freight enjoy the benefit of a charter of rights in future?

These ideas would take part of a structural change that could second higher energy efficiency, lower carbon emissions, but above all enhance awareness of the possibilities and limitations of logistics.

On Infrastructure / Capacity limits

One of the challenges the transport market will have to face in the future is the issue of infrastructure and capacity limits. As we mentioned in our position paper on the future TEN-T policy¹, people who fail to invest in their future are surely heading for decline as transport infrastructure is both the cause and the measure of growth and prosperity. CLECAT is pleased to see that the Commission realises that "making the optimal use of existing facilities can already achieve a lot with more limited resources" (point 66 of the Communication). We now look forward to concrete actions to be taken in the future proposals and white paper, while keeping in mind that many infrastructures, especially in Eastern Europe, are in need of a major restoration and extension.

¹ <http://www.clecat.org/dmddocuments/pp008osecr090427greenpapertent.pdf>

The EU policy will need to adapt its transport policy to the future changes in global shipping and trade, by taking account of Europe's special geography (70.000 km of coastline, 1200 seaports) and using it as a competitive advantage. Indeed, the European continent will need to have good export in an increasing globalised world and will have to deal more and more with significant import from Asia and other areas both from maritime and land transport (e.g.: the rail route duration from Asia to Europe is expected to significantly decrease).

This increasing trade with the rest of the world implies an important increase of hinterland transport. It is therefore of paramount importance that ports both in the northern rim and in the Mediterranean have decent hinterland connections because they will face an increasing amount of imports from all over the world in the future.

This position paper is the occasion to repeat again that the EU needs to take urgent measures on preparing for this future scenario, whilst existing connections and infrastructure are clearly touching their limits both inside the ports and in their immediate surrounding areas. One of the immediate actions would be to better integrate ports into an upgraded TEN-T network. However we also agree with the Commission's assessment that much can be done in the area of promoting maritime transport, taking stock on the very good Maritime Strategy 2009-2018 communication and the Maritime Transport Space without barriers proposal. Short-sea shipping is certainly a viable and sustainable alternative for intra-European trade. However the port infrastructure in most of the European Union has reached 90-95% of its capacity. Although the economic crisis is at the moment helping to keep this problem at bay, once the economic recovery arrives it will be already too late to make the long-term investments that are needed. It is therefore now the perfect time to invest in port and other transport infrastructure, which will produce benefits once the European economy recovers.

Developing better transport capacity is not only important to receive an increasing amount of goods from all over the world; it is also a crucial factor in emission savings and to optimise transport modes. Therefore it is impossible to understand why we run short trains (sometimes shorter than 300 or 500 metres!) and short trucks (instead of modular vehicles that could also improve the cost benefit of intermodal systems) and we treat light commercial vehicles (LCV) like passenger cars, without taking account of their carrying capacity. We cannot afford a future EU strategy in emissions reduction for LCV that means practically **more** vehicles on the road for the same amount of goods. This would increase the overall emissions in spite of any possible technical progress.

CLECAT strongly encourages the creation of dedicated corridors for freight (and therefore supports point 67 of the Communication). We need clear rules about sharing infrastructure, where all, and not only some, find a place and can make predictions on the type of service they will get. This being said, we insist that, as regards rail, a future freight oriented network is impossible to achieve without a renewed attention to sidings to/from the main lines. To promote a commercial approach to sidings is thus indispensable, in particular for Single Wagon Load (SWL) transportation. This is the reason why CLECAT believes that track access to rail services like marshalling yards and public sidings must not be discriminatory and should be open to all operators and authorised applicants.

CLECAT welcomes the comments made by the Commission on the need to tackle congestion. We appreciate that the Commission recognises that "As most freight and passenger transport starts or ends in urban areas, urban congestion also negatively impacts inter-urban travel" (point 33 of the Communication). It is however important that the Commission realises that congestion is not only affecting urban areas. Congestion hot spots are well identified, in particular since the bottleneck exercise, and it is now time for concrete actions from the Commission to address this

issue. This also means tackling not only freight transport, but especially individual passenger transport. As we have said before: freight does not have legs. That means that we are bound to use the road for inner-urban travel. There is no realistic alternative to delivering goods by road to the shops. While we acknowledge that this is one of the reasons for congestion in inner cities in the morning, we have also shown solutions to cope with it: dedicated freight lanes, extending delivery hours, increasing the attractiveness of public transport for individual passengers, create infrastructure for cycling, but also for alternative fuels (e.g. heavy goods vehicles could use hybrid technology in the future, which would diminish CO₂ emissions).

In that respect we would like to draw the attention of the Commission to a very promising alternative in fuel technology, which we feel has not been given the attention it deserves yet: bio-fuel produced from algae. There have been several promising studies on the topic, which we recommend taking a thorough look at.² The problem of fossil fuel dependency is a problem that needs to be address as soon as possible.

On harmonisation in an integrated network: the key for a sustainable future

A better exploitation of the network's capacity and of the relative strengths of each mode, as we have called for above, could contribute significantly to reducing congestion, emissions, pollution and accidents. This however requires the optimisation and operation of the network as a single entity, whereas currently modal networks are largely separated, and even within modes there is a lack of integration between countries. Harmonisation and interoperability are very important for a successful transport market in the future and we believe that the EU still has lots of progress to make on that matter as the European network is not perfectly integrated: is a network that implements ERTMS on certain axles but still allows member states to have derogations an integrated network indeed?

CLECAT believes that efforts for EU harmonisation should be pursued in the following fields to meet the future challenges of the transport market:

- Harmonisation/interoperability of ITS Technology, including extension of ERTMS implementation
- Unrestricted cabotage throughout the EU territory, which would reduce empty runs
- Internalisation of external costs like CO₂, noise, and congestion in all transport modes and for all transport users with a strong focus on earmarking: it is absolutely necessary that money deriving from the transport sector is used in all Member States to mitigate the downside of transport in congestion, pollution and accidents,
- Authorised applicants to be made mandatory throughout the EU and in particular in the TEN-T.

On the issue of cabotage we would like to add that we strive for a harmonised common system in the EU. If this is done avoiding unnecessary bureaucracy, it would bring benefits to customers and transporters alike, in addition to environmental advantages.

On the internalisation of external costs we would like to add a thought, which in our opinion is worth full consideration: if users are charged for the use of infrastructure (e.g. roads and bridges), they should be able to receive compensation, if the infrastructure is unable to provide smooth operation. Passengers are able to obtain compensation, based on European legislation, in case of delays (e.g. air and rail), whilst no compensation is to be expected for freight. On the other hand freight forwarders are contractually obliged to deliver under a time constraint, the same goes for other logistics service providers, such as hauliers, and have no hope to be

² For more information: <http://algaeoilbiodiesel.wordpress.com/>

compensated in case of delays due to, for instance, congestion. In countries where road infrastructure is charged, some have managed to get compensation for delays, if the information on congestion was not brought to the attention of the user with sufficient expediency. If infrastructure charging (especially external costs) gains a pan EU perspective, it is just and right that sufficient compensation for possible shortcomings in addressing the externalities that can produce damages to freight users be identified.

This being said, taxation should not be seen as THE panacea to face obstacles; the use of incentives is also a proven method to achieve behavioural change.

CLECAT would also like take the opportunity of this Communication on the Future of Transport to say that we are interested in the possibility of entering into a social dialogue regarding the possibility of a European-wide vocational training programme dedicated to the logistics sector, and based on the FIATA programme which is already in place in other areas of the world³.

As the Commission rightfully says at point 53, “the competitiveness of the EU economy and the resilience of the transport firms depend on the capacity to adapt to innovation and new market needs”, and the transport labour market needs to adapt to this trend and be ready to face new challenges and market trends. This point does not only concern the transport sector, the European population is becoming older the working life is expected to increase: working competences will therefore need to be constantly updated through training programmes. Although there are many European countries that have their individual training programmes, there are some who have no programme at all. There is also the lack of a cross-Europe, high level training programme which is standardised and specifically aimed at the region; all the current programmes are different. A Europe wide standardised training programme would allow companies to work more efficiently with better trained staff and would allow workers to increase their work options making mobility a reality for their own advantage and the companies’.

On the importance of technological innovation

CLECAT agrees with point 68 of the Communication on the importance of ICT solutions for allowing “better management and integration of transport flows”. Technology is absolutely essential to mitigate the negative impacts of transport and – at some point in the future – to reach a carbon-neutral transport sector. Only with new technology will we be able to solve one of the biggest problems we have: the dependency of the transport sector on oil. Not only are alternative fuels a possible solution, but also developments that focus on enhancing the energy efficiency of vehicles, buildings and infrastructure. CLECAT perceives technology as one of the biggest opportunities for the transport sector, but sees also the necessity for the Commission and the EU Member States to become more active than they already are with the relevant Framework Programmes. In addition it must be stressed that every new technology should initiate from the private sector and any possibility of favouring one technology over another by governments or administrations should be strictly off limits, in order to ensure that the best technology can survive on the market and no solutions are pre-determined with a view of distorting the market. Research and development start with certain aim in mind, not with the way to reach this aim.

However, it is important that technical innovations that become operational are interoperable with respect to other solutions and that EU level standardisation and/or certification is based, as far as possible, on interoperability criteria that leave room for different technical solutions.

³ Details of the programme can be found here <http://www.fiata.com/index.php?id=198>

It is the reason why CLECAT has decided to dedicate this year's Freight Forwarders' Conference, which will be held on the 3rd of December in the premises of the WCO, to explore the potential of technology for the freight forwarding and logistics industry with a view to achieving better service for EU trade.

Several technological problems still need to be resolved before electricity (especially that produced by renewable sources and CO₂ free) can be seen as THE solution for the road (and to some extent the rail freight sector). Penetration of electricity as a source of energy must be enhanced in rail transport as the use of electric traction in rail throughout the EU is far from achieved. Indeed, even though it is certainly true that the main passenger lines are electrified, this is unfortunately not true for vast areas of the eastern parts of Europe. In freight operations, diesel engines are still a very high percentage of engines overall for different reasons, both technical and infrastructural.

When speaking about road transport, we all know that petroleum provides almost 100% of the energy it consumes. It is unlikely that electricity will be used as a source of energy for large trucks throughout the EU. It would however be theoretically possible to use electricity for light vehicles (vans) in cities but there would still be the problem of the autonomy and the weight of the battery detracting from the carrying capacity. However we see possible value in hybrid trucks that run on normal (or bio) fuel outside of the city, and have the ability to switch to electric energy when delivering goods into the city. Hybrid technology can also allow for up to 35% savings in city limits operations (e.g. Volvo Hybrid trucks and busses). Electric private cars seem to enjoy a better chance of conquering the market in the next few years and we hope the EU shall not decide to lag behind China and Japan in this technological breakthrough.

We consider hydrogen cells as interesting experiments but we still raise doubts concerning their economic viability and their safety. We believe that road transport is vital as a production tool and the EU should therefore reduce restrictions as there is no alternative to road transport at the moment. As immediate actions, besides fostering other innovative technology such as hydrogen cells, electric vehicles and bio-fuels, longer and heavier vehicles like the EMS concept are easy to implement and would allow considerable savings in terms of emissions and capacity, whilst almost certainly improving road safety as well.

Finally, apart from developing innovative technologies, CLECAT would like to stress that much work still has to be done to achieve a different paradigm in the distribution of energy (be it electric, fuel or gas). This is a sector that has not shown any substantial innovation at least for the last three decades, despite noticeable changes in the landscape of the distributors.

A general comment with respect to technological development is that the ability to foresee in the long term and legal the certainty of standards are important to ensure a good climate for investments.

Comments on some of the points raised by the Communication

On point 6 of section 2, CLECAT Members would like to congratulate the Commission for the achievements in the ETP that are listed, but they would equally recommend that the future steps take stock of some of the pitfalls in which our hopes have fallen in the past. Policy objectives must be carefully assessed and identified; we should avoid deploying resources on merely ideological aims that unfortunately cannot become reality, if not forced through costly stimulus packages. We believe that the overall results of the policy focussed on "decoupling" especially and to some extent "modal shift" was not a success, at least in freight movements. As we have written in the past, these are unrealistic objectives, if they are objectives at all. They must be

substituted by a more realistic approach that is able to recognise what can be achieved in the transport domain and what is instead a societal issue that cannot find its answer, or its cure, in the logistics market.

In the same section on point 7, we agree that our mobility system still compares with the most advanced regions of the world, but we would like to comment that this is no surprise as Europe has been the most advanced region of the world for almost 1000 years, until the end of World War I. The real challenge is to catch up with "the most advanced areas of the world" of this millennium, where we see enormous investment in transport infrastructure and technological development being made, whilst the same cannot be said in Europe. Unfortunately our transport system pays the price of several decades of underinvestment now, when growing demand has put it to the test with the evident consequence that our Sustainable Development Strategy cannot be met. This being said, the way to achieve better results in our SDS **is certainly not to imagine (or desire) a continent where our development is stifled by the lack, or the level of its transport infrastructure.** If we read point 7 in combination with point 9 we can see that a significant part of the future strategy for a sustainable transport policy is already written: the integration of our national networks and proper investments in maintaining and building infrastructure will be one of the key elements for a sustainable future in transport.

On point 12 of section 2, we should like to point out that security has become an integral part of public and private management. However, it is not surprising that our passengers' transport network was targeted by terrorists since the issue of security in the past had yet to become crucial as is today. Many EU countries (UK, Italy, France, Greece, Spain, etc) had suffered from terrorist attacks long before 2001 and an adequate security policy would have been justified earlier on. The commitment of our Members in the implementation of proportionate and effective security measures in freight transport has been second to none and we believe our contribution to freight security has been contributing to the enviable record in freight transport security our continent has. In addition we would like to stress the necessity to get rid of all unnecessary bureaucracy, which has been extended in recent years in the area of security, especially in the area of aviation security (e.g. useless repetition of data on transport documents). The action of the European Union, whilst rightly targeting ever more effective measures, should intensify its efforts in the area of reducing the burden on the industry.

In the same section on point 14, as stated above, we wish to inform the Commission and the public that CLECAT is fully committed to introduce reference standards in vocational training in logistics and is actively working in this area to come to a pan-EU scheme, with a view to getting the Fiata VT programme approved at the level of the Social Dialogue.

On point 15 CLECAT Members understand the concerns expressed by the Commission, but they wish to draw the Commission's attention to the fact that the growth of the transport sector is a consequence of demand, and its growing emissions trend has been significantly curbed by new technology. This is also the area where we expect a breakthrough, as soon as an alternative to petroleum is able to take on a real business dimension.

On point 16, we do not wish to repeat ourselves unduly: decoupling is hardly a political objective; it is only a phenomenon that can be measured if it happens. The conditions that make decoupling measurable are unfortunately normally dire: wars, epidemics, disruptive changes (e.g. nuclear energy instead of coal), etc. It is sad to read the meek tone of the phrase where "the strong increase of global trade and the deepening integration of the enlarged EU prevented the decoupling of freight transport from GDP in the last decade" is reported. In other words, are we disappointed because global trade, which brought better living conditions to billions and the enlargement, with its evident success, obstructed the objective of decoupling, which is probably

just a fantastic invention? The growth of freight demand is connected with economic and social growth. In recent times freight transport demand has fallen by 20-30% in Europe and this was connected with the recent economic crisis. It is high time that the idea of decoupling as it was imagined in the 2001 White Paper were abandoned, unless we wish to stabilise the present decline by means of policy measures. In addition the point raised here is at odds with the simple and straightforward observation we read at point 37 of section 3.

In our opinion decoupling transport from economic growth is a meander that should not be taken again. Policy should rather be concentrating on the four main obstacles that the transport industry faces in its quest for efficiency:

- Unavailable or insufficient infrastructure;
- Distortions in full and fair competition;
- Incomplete common single market in some sectors (e.g. Rail Transport).
- Inability to spend the R&D resources to achieve a sufficiently rapid technological development

On point 22 of section 3 (as connected to point 23) we wish to observe that policy can mitigate the consequences of demography. In other words an efficient immigration policy can mitigate the problems connecting with the ageing of the population. This is probably a must, because the EU cannot afford ditching badly wanted transport infrastructure and other improvements because of lack of funds connected with ageing. The world's population is still growing strongly and there is no reason why this should not be seen as a resource. In reading the above point in conjunction with point 33, we also conclude that dealing with the infrastructure issue is probably the most urgent action wanted at EU level. Fewer immigrants would ever want to come to live in a declining continent with insufficient services and inadequate infrastructure and this would further increase the ageing and decline curves.

CLECAT Members have particularly appreciated the inception points (44 & 45) of section 4.2, which seems to summarise in a few words one of the most important concepts of logistics. The concepts raised at point 47 of the same section are also particularly important, even though they do not go as far as admitting the reality of a severe lack of infrastructure.

CLECAT reads with great interest the statement made at point 54 of section 4.5. This is an important assumption that should be kept well present when devising policy that affects the continental transport market. We do not believe that protectionism is a viable solution to mitigate difference and approximate labours conditions in different countries. We have repeatedly stated that we are in for a fully operational, harmonised transport common market. In order to achieve it, we believe that our workforce should be allowed to hope for full mobility all over the European Union.

Coming to the important section 4.6, we would observe that the concepts raised at point 56 may seem logical at first sight, and perhaps they are in passengers' transport. When applied to freight, such Manichaeian conclusions may sound oversimplified. In most cases, price is only one of the factors that come into the final decision, reliability and efficiency play generally a much greater part.

Comments on Section 5

An element that should never be forgotten, when stating the concepts explained at point 63, is that logistics (we believe also in passengers' transport) rests in a fine balance between traffic consolidation, frequency and accessibility. In other words multiplying intermodal terminals (in the attempt of channelling cargo to intermodal solutions) may not necessarily always solve the

problem; to the contrary it may divert resources from badly needed alternative infrastructure. We should not forget the "detour factor" concept that was developed (and harshly criticised) in the ISIC project in 2005. Multiplying the number of intermodal terminals may not play in favour of containing transshipment costs. Transshipments are already an additional cost and this extra cost must be compensated by some cost containment in other areas, e.g. the end road legs. The will to improve interaction between transport modes is excellent, but the solutions must be defined with a view to what is actually needed in order to create optimal and cost efficient solutions in each specific case. This also highlights the need to make targeted investments, as well as the advantage of defining green corridors, where, inter alia, optimised efficiency will reduce the carbon footprint of transport.

In this context, CLECAT would also like to underline that for the co-modal approach (points 38 and 63) to become fully efficient, a number of legal Acts and programmes based on the idea of favouring modal shift away from the road would have to be reviewed, in order to allow for a more holistic view, where better results can be achieved both in terms of efficiency and environment.

On the statement made at point 70, one could observe that insufficient infrastructure and inefficient logistics would be no smaller threat to the EU than the collapse of its financial sector that has been hopefully stayed by impressive financial resources made ready and available in no time by governments. The longer time that declining logistics infrastructure may take to allow a powerful economic downturn to kick in should not distract the wise policy maker from thinking that a return to growth may take at least as long and that infrastructure cannot be improvised in a week-end meeting. In reading these concept in connection with point 71 one wonders why earmarking is not the foremost policy mission of the EU.

As regards point 74, CLECAT has repeatedly stated in public that the internalisation strategy proposed by the Commission should be significantly improved on the basis on three main principles:

- ascertaining the existing level of internalisation of externalities in different countries and different modes of transport;
- approximate the internalisation charges at EU level with a view to harmonising the charging policy all over the EU;
- all users must pay a fare share, i.e. private cars cannot escape an internalisation scheme.

The policy options that are on the table now are totally unacceptable for CLECAT Members and probably for the vast majority of the business community.

As regards point 75, we believe a correct appraisal of the revenue generated by transport activities would show that not only is transport self financing its own (alas scarce) infrastructure, but it is in fact a net contributor to the revenues of most MS's.

The importance of the statement made at point 81 cannot be made greater. The modal continental transport market is far from achieved, whereas the completion of the single market is the one single policy action point that may unleash a tremendous potential for innovation and sustainable development.

Conclusions

CLECAT welcomes the Commission's effort to initiate the discussion on the future European transport policy by producing a dispassionate communication, albeit sometimes questionable concerning a few statements, which is certainly an ideal ground for debate. The concepts contained in the Communication are a first indicator of which direction policy makers need to

take to transform the European transport sector in a sustainable, diverse, and economically thriving part of the European Community. The public expects however the Commission to use this important paper to come up with concrete measures that are able to tackle our future challenges.

In this view, the content of point 88 of section 5.6 is certainly very clear. The Commission could, and possibly should, work in the future as an effective broker of initiatives, by putting people and governments together, leveraging funds and looking out for their usage, in the areas where the coordination of a European overall strategy is most effective: the area where private interests and subsidiarity may come at odds with the overall EU transport policy.

The next White Paper, which will be based on the findings of this exercise, has a historical mission to accomplish. The problems that we face today were not so clear to many in 2001, the time of decision was probably yesterday and we can only hope today is not too late. The decisions that were taken (or not taken), at least in the freight area, were somehow questionable. All the more it is important that the right choices are made now without further hesitation.

Not only does the transport sector struggle with the demand to produce carbon-neutral, efficient and sufficiently cheap transport, but also the economic situation has taken its toll on logistics. Skilled staff have been lost and it will be painful to get back to the same standard of performance in future. In addition to these problems the forwarding (and other) industries also have to cope with more and more stringent security rules, which are the direct result of worldwide increased security awareness. These additional measures have been a heavy economic and administrative burden, not only for our sector, but also for the end-user. Initiatives like the Eurovignette or the financing of security measures will add to the burden, if they are being implemented unwisely.

The decisions which will be made over the next decade are supposed to influence transport policy for the next 30-40 years at least. Infrastructure can influence development in proportion to its importance. Some dramatic changes in the landscape of logistics have been changing, and are still changing the world: the opening of the Suez Canal in 1869 has changed the destiny of Asia for good and is still influencing the way we are doing business today. Not all investments are of this magnitude, however even less impressive infrastructure investments have an impact, both if they are made and if they are NOT made.

The trends in freight transport are among the greatest measures (and results) of prosperity and we should stop thinking of freight transport as an unwanted inevitable evil. It is instead a dignified and professional way of contributing to our prosperity. Its role in this respect has to be recognised not only in terms of mundane remarks, but also in terms of concrete investments and measures that can give it the perspective to become one of the main components of our sustainable future.

The Commission faces an impressive task: proposing concrete measures, tackling the above problems, watching over the implementation of the adopted rules, with a view to open the trade lanes of our future. This needs vision, courage and more vision.

CLECAT was happy to have the opportunity to contribute with its views to a sustainable European transport policy. We remain at everyone's disposal for any further information or clarification that is required.