

The European Voice of Freight Logistics and Customs Representatives

Brussels, June 15th 2011

RE: White Paper – Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system COM(2011)144

CLECAT is the reference organisation at EU level that represents the interests of logistics at large, freight forwarding, transport and Customs related services. Freight forwarders and logistic service providers master the entire supply and value chain on behalf of their clients and they do not privilege any means of transport or transport infrastructure as such. Their logistic solutions satisfy both production and consumption, both supply and demand; they 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, freight forwarders utilise the entire and complex logistic infrastructure with a totally unprejudiced and cost-efficient approach.

We must start first of all by congratulating the Commission on the publication of the Transport White Paper. The first impression after reading the document is that it is an inspirational document to be viewed as part of a 40 years' strategy, with a time horizon to 2050. We fully share the Commission's concern that changes are inevitable in the transport industry due to economic and environmental pressures. For this reason, it is only proper that the Commission has established this long term transport plan in which we believe that a modernisation of EU infrastructures should be the cornerstone.

We shall structure this analysis in four parts: some general statements, some of the questions that have raised concern within our membership, the objectives that were received with interest and expectation and some detailed remarks on the actions. We would also recommend taking account of our position papers that are published on our website (www.CLECAT.org), where they explain our positions on identified Commission's actions or proposals in greater detail.

Looking back at the last 40 years, the growth in international trade has largely been based on three main tenets:

- Diminishing cost of transport, due to larger, more efficient and containerised conveyance systems
- Relatively stable fuel costs
- Manufacturing becoming increasingly centred on the Far East

The White Paper shows that these tenets will not remain in the future, underlining that:

- The need to move goods and people will increase
- Transport will have an even more international dimension
- Oil will become more scarce and expensive

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- Emissions will need to be reduced

CLECAT agrees with these principles although we believe that the third one concerning oil scarcity needs careful consideration as the world and particularly the seas are vast areas in large parts yet to be explored. There is the possibility of discovering large reserves that will help meet world demand for the foreseeable future. Oil's great advantage is that physically, it is a relatively stable commodity that can be used for a variety of power generation purposes. Its commercialisation has been made ubiquitous and it is unparalleled by any other source of energy. The current alternatives are not as physically stable, have fewer and more specific applications and sometimes even worse side effects. This does not mean that research should not try to find alternative sources of energy, but substituting petroleum is certainly a great challenge, especially in transport.

On the other hand many are convinced that peak-oil is already in the past, therefore petroleum will at least become more expensive and our industry must look at alternatives. As an intermediate solution natural gas can be an alternative; e-mobility is only part of a solution, but fuel cells may become more important, if renewable energy is used. Our goals in greening transport in general can be achieved only with real alternatives in the energy resources for the "greening" of road transport. Rail transport can provide supplementary solutions, but it would never be able take over the role of the road transport industry.

More generally, CLECAT does feel that maximising transport efficiency is important because it will help control costs and benefit the environment. We doubt whether all the necessary technical innovations are currently available. For instance the debate on reducing maritime pollution has highlighted this problem since the Commission is pushing for changes, in this case, in excess of international requirements and technical availability, thus making regulation one of the drivers for new technology. That being said CLECAT does feel that new technology, including power sources, improvements in infrastructure and better IT systems and their utilisation to ease the flow of goods and reduce costs due to congestion will benefit all parties.

CLECAT Members are also concerned about the rather negative comments related to road transport contained in the White Paper, and particularly the arbitrary imposition of a 300km limit on such journeys appears rather artificial. Road has been a major force in driving the growth in trade-providing an efficient and flexible transport method of moving intra EU cargo and goods originating from outside the EU. It will take time to develop new systems to replace road freight, and some will doubt that the alternative linked rail/water solutions will ever provide such a real alternative. Rail over long distances can provide cost savings, but it is not so reliable as it could (and should) be. Importers and exporters continue to push for quick deliveries in order to recoup the longer transit times from the Far East due to slower steaming and this requirement cannot be ignored.

Traders do not want new systems if they cost more or increase their inventory costs and one area that the White Paper has singularly failed to address relates to addressing the end users attitudes. Effectively the transport sector is stuck between meeting the Commission's aspirations and the cold economic demands of its customers – not a comfortable place to be. These new systems will be developed by operators; our members will be able to facilitate the cargo movement by linking the provider and user. If they understand the changes they should be involved in discussions to influence the outcome. The envisaged new multimodal systems do provide increased opportunities for managing cargo movements, but greater efficiency must be achieved possibly by looking at integration with the road mode without prejudice.

We can support the use of cleaner energy, using information and changing delivery times to reduce congestion etc. However, we feel that the market should determine the transport method to be developed and used. By taking road out of the equation for distances over 300 km, the Commission would be removing an essential element of competition from the marketplace, making it less likely that multimodal services both should and would provide the required efficient service levels. In other words the 300 km prescription should be interpreted more as a guiding principle than as an indication of a regulation requirement.

The Commission must understand that it cannot have the prosperity that it demands unless it recognises:

- That there must be full competition within the marketplace, within modes and between modes, without pre-selecting any champion;
- That there will be situations where economic and social necessities will outweigh environmental aspirations;
- That there are areas where emissions reduction is easier to achieve and may impact the over all picture more significantly (e.g. household and buildings).

The Commission clearly states with the publication of the White Paper its preference to use rail over long distances – with road being used for short journeys to conclude the cargo movement. Before road, rail and water were the main method of economically shipping goods over a long distance. The White Paper anticipates that the Commission will revert to this model, with improved links to sea and air over the next forty years, reversing the trend of economic development since the 1930's. However, the Commission does not seem to have taken into account potential public opposition, particularly at local level to new rail lines and railheads, increased numbers of longer and heavier trains using the system or increased road traffic to and from railheads. Such developments will be subject to local planning procedures which can be both cumbersome and slow, and this may affect all modes of transport, not only road and rail. These delays have the potential to considerably hinder progress towards the Commission's goals of reducing emissions whilst maintaining economic prosperity.

Within the White Paper there is also considerable reference to improved technology, in relation to reducing emissions and improving transport management. In many ways these are the most achievable goals that are contained in the White Paper and the process to achieve them is already under way. The main problem that needs to be tackled is the anticipated growth in trade that will raise the number of vehicles increasing congestion and pollution levels. The sector has become gradually more familiar with technological change, for example the legislation relative to stricter emissions controls which has led to some cost savings via increased fuel efficiency. Also better traffic management to reduce congestion will generate both economic and environmental benefits. However, whether this is achievable with or without using fossil fuels is debatable; alternatives such as solid fuel cells are still in the development stage and have the potential to be as environmentally damaging. The principle that we must fend for our future without counting on fossil fuels is however now mainstream thinking and we must be able to live up to this expectation.

The White Paper also rightly acknowledges that transport is an international activity; however, infrastructure projects still tend to be too much regarded as national or regional projects, with all the problems this brings. Our understanding is that in China there are currently 19,000 km of railway under construction, a figure hard to imagine in the EU. This growth reflects both the ease of obtaining planning and anticipated returns to capital investment. Looking at the investment figures suggested in the White Paper, it is likely that some of the funding will have to be raised on the international money markets: this will only be achievable if the returns will be

sufficiently attractive to investors and the necessary funds are available. With all due respect to the changing patterns of our society, it is impossible to imagine that the necessary infrastructure will be built and maintained without substantial public funding.

A worrying aspect of the White Paper concerns the comments relative to reviewing transport's favourable taxation benefits, which were introduced because of the international nature of sea and air transport and which, if adopted, have the potential to push up prices. CLECAT Members feel that the transport sector is too often regarded as a Government's "Piggy Bank", where money can be easily extracted to raise funds that are then used to subsidise other sectors, even those that should produce wealth and not burn it, and will therefore regard any potential tax changes with suspicion. It is no surprise that the twin concepts of the "polluter pays and "user pays" enshrined in the Eurovignette legislation has been carried forward into the White Paper. In general terms, the transport sector has grown used to and accepted these ideas. However, there remain important issues:

- There should be reductions/abolitions on other transport related taxes such as Fuel Excise Duties and Vehicles' taxation, to avoid exorbitant cost increases.
- Funds should be ring-fenced and then re-invested in transport
- There should be a fair balance between the taxation paid by private and commercial road users

We can see reluctance from the individual national Finance Ministries because they will lose control of a valuable revenue source. In our view however, the system would only be deemed acceptable if the burden of taxation on the transport operator remains tax neutral and the revenues raised are correctly spent and re-invested.

There is also another aspect of the White Paper's overarching choices that could be less favourably interpreted: we find greater emphasis on negative market based measures (such as the Eurovignette and other forms of charging) than on positive strategic choices, such as the adoption of appropriate incentives for best performers, the early adopters of new technology and all those who show to fully and wholeheartedly embrace competition, where it is still insufficient such as in rail transport.

Despite all these concerns that CLECAT has commented on so far, we also feel that the White Paper includes several good ideas that need to be fully explored and developed:

- CLECAT supports the concept of an integrated Single EU Transport area that allows the speedy transfer of freight and people. Improving the transfers between the various modes will increase flexibility and choice and in a way may increase the systems robustness. For instance, good multimodal capability would have had the potential to allow faster shifts between the modes during the Volcanic Ash crisis which created significant passenger and trade problems.
- We are pleased to see considerable emphasis in the White Paper on access to information regarding transport services in order to increase access to the market and maximise its potential. Conceptually this is an excellent idea, even if the key for success would be the efficient management of the information. Something as simple as agreeing to a standard layout for timetables and service availability would make life so much easier for all users of the service.
- The emphasis on technology made in the White Paper is praiseworthy, but fraught at the moment: you only have to read the maritime press regarding the debate regarding how to

power vessels to reduce emissions. There are competing technologies all with significant issues (particularly safety) attached to them. What the Commission did not touch on is the subject of the global impact of the changes, for instance if vessels switch to CNG, the impact on bunkering arrangements will be significant.

- Maximising usage as stated in the White Paper is an important step in the right direction since reducing waste will probably reduce costs and emissions. The downside is that potentially systems will become less flexible. This needs to be pursued and linked with better planning and information of journeys may be the simplest and most effective way of achieving many goals
- CLECAT is also pleased to see that the Commission mentions in the White Paper the lack of knowledge of potential transport options as one of the obstacles for shippers and forwarders to develop efficient and environmentally friendly multimodal transport (§432). These issues will constitute the main theme of our next Freight Forwarders' conference entitled "Facilitation and Compliance" which is scheduled to take place in November.

After these general remarks, we would now like to comment on the list of initiatives that are contained in the Commission Staff Working Document accompanying the White Paper. Whilst we generally welcome and support these initiatives, we however regret that they generally tend to remain fairly vague in their content and we fear that they might in the end fail to turn into concrete actions if they are not followed by a calendar for detailed implementation.

The followings illustrate some of the initiatives for which CLECAT was expecting further announcements in the White Paper:

- CLECAT regrets the Commission's lack of action concerning the development of rail interoperability and quality of rail freight services in Europe
- No concrete decisions and deadlines for implementation are included in the White Paper concerning the developing of Truck Parking Areas and the future extension of the scope of the Eurovignette directive to other users
- The Commission has remained too vague on its intention concerning the adaption of Directive 96/53 for the use of longer and heavier vehicles
- The White paper refers to the creation of quality jobs to operate the improved systems, whilst there are already significant skills shortages in the transport industry. What is of concern is that no mention is made about recruitment and training plans for the additional staff. This we feel is a serious lapse made by the Commission, because these improved systems will simply fail to function to their full capacity without properly trained staff.

CLECAT would now like to analyse and comment on the list of initiatives announced by the Commission that would affect the freight sector. We shall follow the order of the forty initiatives listed by the Commission as we think this may be easier for the reader.

Initiative 1: A true market for rail services

Governance and enforcement: a stronger role for the ERA, unbundling and infrastructure managers: As the Commission rightfully pinpoints in the White Paper (§138, 139, 140), the functioning of National Safety Authorities (NSA) and Regulatory Bodies needs to be improved in order for the rail freight sector to benefit from a healthy competitive framework that is not influenced by national politics or incumbents. In this respect, CLECAT welcomes the Commission's ambition to reinforce the role of the European Railway Agency (ERA) as we are

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convinced that the completion of a competitive continental rail freight market passes through such an approach. While enhancing and expanding the role of the ERA, we believe that more weight should be given to the users and that a balance of objectives between asset owners and service users should be reached.

Developing an integrated approach to freight corridor management: On this, apart from the (already) entering into force Regulation 913/2010¹, which establishes a European rail network for freight based on international corridors (§145), we believe the Commission should be more vocal about the eventual objectives that the Regulation can achieve. The freight corridor approach of the Regulation was good, but the Commission should not lay solely on this initiative to make rail freight more competitive with other modes. The improvement of the quality of rail freight services, in particular reliability, should have found greater emphasis in the White Paper. There is still a lot of work that the Commission can carry on to create decent conditions and incentives that would attract future customers to use the rail freight corridors, and rail will increase its market share only if it shows a comparable level of performance with alternatives transport modes.

Ensuring effective and non-discriminatory access to rail infrastructure, including rail-related services: CLECAT is very pleased to see the Commission's determination to ensure fair and non-discriminatory access to the rail infrastructure and to rail related services as it can contribute to promote the efficient use of rail infrastructure and to have full and fair competition in Europe. We will therefore strongly support a proposal from the Commission on the separation between infrastructure management and rail service provision (§141) in hopes that such a proposal will foster genuine independence (unbundling) in legal, commercial and financial terms. We are however disappointed to see that the Commission has not considered it relevant to sanction the principle that Authorised Applicants benefit from open commercial access to infrastructure throughout Europe, as we are convinced that this would add healthy competition between Infrastructure Managers and their customers and benefit the EU rail freight market with a large volume of freight that would otherwise never approach rail freight. Finally, CLECAT believes that the idea to establish pan-European infrastructure managers along key corridors suggested in the White Paper (§143) might be beneficial on the condition that it enables a better cooperation and coordination of their actions, with the overall purpose to improve the quality of the whole end-to-end service.

Initiative 2: Completion of the Single European Sky (SES)

CLECAT welcomes the ongoing completion of the SES as one of the primary achievements for European air space in recent years. We are convinced that the prompt and encompassing implementation of the SES is an important strategic step towards further European integration and strengthening of the European common market. The implementation should be based on the principles of security and safety, capacity, sustainability and cost-effectiveness. We also welcome broadening the responsibility of the European Aviation Safety Agency (EASA) by including safety of aerodromes and Air Traffic Management (ATM)/Air Navigation Services into their portfolio.

Especially in the light of the recent Volcanic Ash Crisis we need more than ever a functioning European Air Space that is managed centrally and encompasses not only EU Member States, but also the neighbouring countries. While forwarders manage to cope with disruptions in air space to a certain extent, seeing that it is the principal task of the forwarder to organise and optimise the logistics supply chain, we are concerned about the relative disarray and uncertainties that followed the eruption of the volcano. We would therefore like to stress the importance for

¹ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:276:0022:0032:EN:PDF>

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collecting expertise, draft emergency plans, better communication and a central agency at European level (EASA) to analyse the situation should it occur again and swiftly open up European airspace as soon as possible to avoid further disruption of logistics chains and economic damages.

Otherwise we agree with the positive results of the SES: tripling capacity, reducing ATM costs per flight by half, improving safety by a factor of 10 and reducing the environmental impact of each flight by 10% (§ 149). In our view these are amongst the best achievements in the Commission's activity in our view.

Initiative 3: Capacity and quality of airports

An airport is one of the principal handling stations and hubs for freight forwarders. Not only EU airports, but also third country airports - together with maritime ports - are the most important entry/exit points into or out of the EU. CLECAT welcomes and advocates the increase of the capacity and quality of airports with the aim to make business more attractive. We would particularly highlight the importance to transform airports into modern hubs that cater to many modes of transport besides road transport, especially to connect it to rail transport. We therefore specifically support the aim to develop an approach to better integrate airports with the railway network.

CLECAT also supports the revision of the slot regulation to enhance airport capacity. Minimum quality standards for ground handlers will benefit the overall quality and service level of air transport industry, which forwarders are an integral part of.

Initiative 4: A maritime "Blue Belt" and market access to ports

CLECAT welcomes the "Blue Belt" concept as an important step towards making short sea shipping more competitive. The European Commission has tackled the problem of the contradiction that exists when a ship is sailing from EU port to EU port without leaving European waters in a logical and comprehensive way. The first information we have received about the project seem very promising and we advise the Commission to conclude the project as swiftly as possible, but the participation of key institutions such as EMSA and Customs must be ensured.

Nonetheless we would like to draw the attention of the Commission to potential operational difficulties. We expect that the fact that goods will leave the Community at the last EU port make for a complication for smaller forwarders in case goods are transhipped to a port outside of the EU as they are forced to deal with port authorities and terminal operators they may not have any prior contact with. While bigger forwarders may have an international network, smaller forwarders may encounter these difficulties. Nonetheless we need to stress that this is an operational difficulty that is probably outweighed by the benefits of the Blue Belt concept. CLECAT is naturally available to discuss and provide solution so that such difficulties can be resolved.

Initiative 5: A suitable framework for inland navigation

We welcome the idea to remove any remaining barriers for a better usage of inland navigation as outlined in the White Paper. Especially for the transnational river systems, which are governed

by a multitude of organisations and actors (§169), it is difficult to implement harmonised rules all over Europe. Inland navigation is only one of the modes of transport used by CLECAT members, and it is mainly used if it provides an advantage over other modes. However there are limitations inherent to the mode that make it less attractive from an operational point and we think it will be difficult to overcome these practical burdens (for example lack of flexibility, capacity restrictions on certain routes and travel time, even if we do not speak of the fact that IWT is unavailable in many areas of the EU).

Nonetheless we would like to emphasise the importance of the inland waterway transport system, not only as an alternative mode of transport, but also from an environmental point of view. Increasing the attractiveness will lead to higher utilisation by forwarders and a reduction in GHG emissions. In line with the idea of a holistic approach to waterborne transport, we recommend that IWT is always dealt with in conjunction with coastal navigation, which is normally supplementary in areas of the EU where IWT is unavailable or insufficiently developed.

We also strongly encourage the Commission to make use of the electronic information systems (RIS) and pursue the interconnection with other systems, possibly under the roof of the e-freight umbrella initiative.

Initiative 6: Road freight

Harmonise the enforcement of rules for professional road transport: CLECAT would welcome a proposal from the Commission to harmonise and enhance the enforcement policies, with the purpose to have transport operators treated on an equal footing throughout Europe (§172). The creation of a European register of road transport undertakings for the exchange of information on infringements (§174, 175), as well as an EC proposal aiming at the harmonisation of the training of enforcement officers (§117), might certainly help to reach this purpose. To improve the efficiency of road controls, CLECAT also suggests the Commission to encourage Member States to provide their respective police authorities with a list of transport companies that are subject to repetitive infringements. Finally, CLECAT strongly supports the Commission's ambition to establish as soon as possible minimum rules on the definition of offences and sanctions for harmonisation purposes (§176). Action is needed to put an end to the lack of cooperation from some Member States in sharing data on penalties for serious infringement, which brings disparity and prevents a future harmonisation of infringement rules at EU level².

Pursue the elimination of remaining restrictions on cabotage: CLECAT welcomes the statement from the Commission that "the elimination of remaining restrictions on cabotage should be pursued", but regrets that the Commission did not deem necessary to provide clearer information on how it intends to get there. The current situation still prevents optimised efficiency in international road transport operations and the publication of the White Paper was the occasion for the Commission to announce a future proposal to provide free and unrestricted cabotage within the EU (at least for vehicle Euro IV or higher). This is however a situation that in principle will end in 2014 even if nothing is done.

Adapt the legislation on weight and dimension: On this issue, the Commission underlines that Directive 96/53³ was conceived in the 1990s to accompany the opening of the international road transport market (§181). The Commission has however not mentioned that the directive has been created also to allow Sweden and Finland (which were new entrants at that time) to keep

² <http://www.CLECAT.org/dmdocuments/pp001oetro100111socialrules.pdf>

³ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31996L0053:EN:HTML>

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using vehicles' combinations (i.e. modular systems) that were longer and heavier than in other areas of the EU. CLECAT remains convinced that a wider and international application of such modular systems in road freight operations will contribute to the improved efficiency and reduced environmental impact. We therefore agree when the Commission says that a fresh look at this legislation is needed (§182) and we hope that the Commission will modify its current interpretation of Directive 96/53 by allowing cross-border operations of modular concept combinations between Member States (providing these Member States allow such operations within their own territory and have informed the Commission thereof)⁴. Finally, we regret that the Commission remained vague about the state of play and the content of its independent work on longer and heavier vehicles mentioned in §183. The adoption of longer and heavier vehicles all over the EU is the easiest way to improve the EU's environmental performance in freight transport in the short term. Only an emotional and irrational campaign prevents EU trade and logistics from availing themselves of this low hanging fruit in efficiency. It is high time the Commission stopped listening to these paralysing sirens.

Initiative 7: Multimodal transport of goods: e-freight

CLECAT supports the use of electronic transport documents and the development of a paperless business environment in general, and would therefore welcome the creation of an appropriate legislative framework for the deployment of tracking and tracing technologies and other technological components contributing to the e-freight concept. e-Documents would indeed be highly welcome by freight forwarders on the condition that they can be used throughout the EU without any discrimination or hindrance and that data security is ensured. Moreover, CLECAT favours a uniform approach, with a single document applying a single liability regime irrespective of the mode of transport and suitable for all the functions of a transport document, on condition that this arrangement is protected by a new internationally agreed convention, which rests on sufficient support by the most important international trading nations. In this regard all attempts to create an EU-only multimodal liability regime are unhelpful and should be discouraged.

Initiative 8: Social code for mobile road transport workers

The Commission intends to use such a social code to address the problem of disguised self-employment (§199). CLECAT welcomes such initiative to address the issue of "fake independent" as it can contribute to protect employees and prevent unfair competition. We already expressed our support in the past to the idea of better identifying false self-employed drivers in the category of mobile workers.

Initiative 11: An evaluation of the EU approach to jobs and working conditions across transport modes

In principle, CLECAT would support any type of Commission's initiatives that would contribute to provide for minimum standards concerning working conditions, driving times and rest periods for domestic and international transport. This being said CLECAT is never tired of reminding the Commission and the other Institutions that there is a big difference between employed and independent drivers and the working time (not to be confused with driving time) may differ significantly between the two.

Initiative 12: Cargo security

⁴ <http://www.CLECAT.org/dmdocuments/pp006oetro100528crossbordermodconcept.pdf>

CLECAT members have always been active and interested in the field of cargo security, most importantly because it protects assets and valuables of freight forwarders and their customers. Since 9/11 we have seen a lot of activity in the area of air cargo security, and CLECAT has actively participated in the creation of Regulation 300/2008 and its implementing legislation in the remit of the Stakeholders Advisory Group on Aviation Security (SAGAS).

While we feel that the European system on aviation security is one, if not the most robust system in the world, we are concerned about recent developments in the area of third country cargo (mentioned in §220). It is mentioned that the Commission "will follow a risk based approach and require improved data quality of advance information about shipments while further improving supply chain security in third countries: through mutual recognition of security and trade programs... ". As CLECAT has followed the recent discussion in the relevant Working Groups we understand, but at the same time are very concerned about the urgency with which the Commission is tackling this issue. We have the impression that due to this urgency the proposal will be less than optimal and become unrealistic to achieve, in particular with regards to idea of organising the logistics supply chain in third countries where there is no such jurisdiction.

Initiative 14: Land transport security

CLECAT members' awareness about the responsibilities connected with enhancing the security of the supply chain has been consistently growing over the last decade. Freight forwarders and logistics service providers have been investing heavily in security measures, which has helped protect their assets and those of their customers, whilst also contributing to protection of citizens dealing with the transportation of goods. CLECAT would like to remind the Commission that enhancing supply chain security comes at a cost that is not negligible and that has been absorbed by the industry so far. This means that the downsides of enhancing supply chain security must be taken into account when devising legislative measures.

In this regard, CLECAT is of the opinion that the aim of the upcoming Commission's Communication (§235) should remain focussed on the protection of citizens from terrorism. We also welcome initiatives such as investments in secure parking areas (a topic which has been tackled by the Commission only recently and with unfortunate budget limitations) or the best practice anthology in supply chain security that is currently being developed by CEN. We would however be reluctant to accept legislation on asset protection. We must distinguish between those areas that may have a public order concern (e.g. proliferation of arms or prohibited articles), and other areas. Unless it becomes of such a nature as to threaten the life of citizens or their collective interests by affecting the public good (e.g. strategic infrastructure, cultural heritage, etc.), the protection of assets should be perceived as a commercial issue that does not require the adoption of targeted legislative measures. In general the industry takes the view that it is not wise to create a costly mechanism to tackle a problem that can be successfully addressed by an insurance cover.

We would also like to urge the Commission to avoid any duplication of existing measures, be it legislation or market led. There has been legislation in place for all modes of transport, in land transport principally in the area of dangerous goods. We are also in ongoing discussions with the relevant section of the Commission, to which also a CLECAT position paper was submitted.

Initiative 15: "End-to-end" security

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CLECAT is interested to see more details on the outlined proposal for an “end-to-end” security system, incorporating all modes of transport. Nonetheless we urge the Commission to take into account that land transport is not easily comparable to other modes of transport due to free movement in the EU and the vast amount of vehicles and movements all over the EU. We strongly support the conclusion by the Commission that monitoring and screening of each cargo shipment would increase security related costs to unsustainable levels (§236).

While we support the AEO and Known Consignor schemes we are not convinced that their respective systems could be carried over to other transport modes. “End-to-end”-security certificates only make sense when they are used on a voluntary basis. As the Commission rightly points out in the White Paper such a new certificate, if it were to come, should be integrated in the existing systems for secure maritime and air transport (§237).

While CLECAT is not opposed to enhancing supply chain security, taking into account that it benefits the companies as well and not only the EU citizens, we would like to caution the Commission not to make hasty proposals in that respect. We would like to see a thorough cost-benefit analysis and stakeholder consultations before legislative action is taken.

CLECAT is in favour of the European and national Mobility Continuity Plans (§238; see also item 2 further up). This will help to limit disruptions to the supply chain and keep economic damages at bay. It is especially the critical infrastructure that needs to be taken into account, i.e. ports, airports, logistics centres, etc.

With regard to the exchange of intelligence information, we would strongly support enhanced cooperation with the industry. It is only through risk assessment based on intelligence that we will be able to prevent terrorist or criminal acts. The sooner our industry is informed the sooner it can react. Unfortunately most of the information is still kept classified, sometimes until it is too late. In addition the private sector should be seen as a partner, rather than a risk factor.

All this being said, when thinking about enhancing supply chain security we should remember that there is no such thing as 100% security and each measure should be thoroughly analysed to determine whether the benefits really outweigh the costs.

Initiative 16: Towards a “zero-vision” on road safety

CLECAT would like to highlight the fact that the number of road accidents due to HGVs is small in percentage and has significantly decreased in the last few years. This being said, there is obviously a lot of work to do in order to get a “zero-vision” and the Commission will have to pursue its efforts in technology, drivers’ behaviour, road infrastructure, standardisation of the quality of vehicles’ repair/control and enforcement policy. We also encourage the Commission to consider the use of incentives (for instance in the form of more favourable insurance premiums or tax reliefs) for companies to stimulate their purchases of road safety equipment. As regards enforcement policy, we welcome the Commission’s ambition to envisage further steps than a cross-border exchange of information on road safety offences (§243). Indeed, the upcoming directive will not be sufficient to create a real coordinated law enforcement systems all over the Union. Areas of improvement also include an increase of target controls on road users in both urban and extra-urban roads in Europe, as well as the development of a harmonised definition of sanctions and offences.

Initiative 19: Rail safety

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CLECAT welcomes the Commission's approach to enhance the role of the ERA in the field of rail safety as we believe it would represent a step forward to achieve a safe, modern and integrated railway network, and to go toward harmonised safety requirements in Europe. Such initiative can indeed contribute to ensure that NSAs share common tasks, responsibilities and competencies in order to facilitate their cooperation at Community level, notably in their decision-making for safety certification. We are also pleased to see the Commission's decision to evaluate the feasibility of relying on a European standard for designing and implementing safety management standards (§273) and look forward to future actions from the Commission in this respect.

Initiative 20: Transport of Dangerous Goods

On this issue, CLECAT supports the Commission's ambition to streamline the rules for the safe intermodal transport of dangerous goods to ensure interoperability between the different transport modes, and we look forward to the Commission's future actions in this respect.

Initiative 23: Mobility Continuity Plans

CLECAT welcomes the Commission's ambition to complement and further improve the EU-wide mobility plan that was adopted in 2010 after the ash cloud crisis in case of a sudden transport crisis in the EU. We would like to stress the importance of a co-ordinated European cooperation and application of rules in order to avoid the repetition of mistakes that have been made during the volcano ash crisis. Please see also Item 2 and 15 for additional comments.

Initiative 24, 25, 26: European Transport Research and Innovation Policy

The deployment of innovative technologies is important in order for the transport industry to be able to maintain or improve efficiency in spite of increasing problems like congestion. Freight movements, deliveries, collections, fleet managements etc. can indeed greatly benefit from interoperable and harmonised technologies. For this reason, CLECAT supports the setting up of a Strategic Transport Technology Plan (§304) if it creates the conditions for a well thought-out, interoperable and harmonised introduction of innovative technologies in logistics and if it is deployed in harmony with, and without the ambition to impose itself onto, the market. This being said, CLECAT would like to remind the Commission that even if innovative technologies can significantly contribute to mitigating congestion and creating the condition for a more efficient use of existing infrastructure, one should not see them as "miracle cures" that could substitute improvements in infrastructure maintenance or substitute badly needed investments in new infrastructure.

With this in mind, CLECAT believes that at this stage the Commission should remain technology neutral for improving the safety and energy efficiency in the transport sector (while not neglecting support of technologies and their necessary infrastructure in due time to enable a possibility for wider market penetration (e.g. invest in the necessary infrastructure of loading stations for battery-driven vehicles)). Instead, the Commission should focus on a system approach and work on the compatibility of innovative technologies according to the differing mobility needs. We believe indeed that harmonisation and interoperability are the two more important aspects to consider in an EU regulatory approach for a successful investment and deployment in technologies such as:

- The implementation of one single electronic tolling service (§328)
- The standardisation of the interfaces of an electronic in-vehicle platform (§329)

- The deployment of ERTMS (§332)
- The exploration of other areas of automation in rail freight (e.g. for single wagons)

Moreover, we would like to draw the Commission's attention to the fact that even if there is an important amount of technologies currently being developed, their successful market penetration is not necessarily guaranteed (too expensive or not enough user-friendly for the user). Smart targeting of R&D is therefore essential and should take on board the development of adequate business models for technically promising ITS devices.

Without forgetting that new technological assets for energy and vehicles and engines are necessary, CLECAT members also believe that other innovative initiatives at European level are also not necessarily focussed primarily on the development of new technology: for example the adoption of the European Modular System at EU level, leaving Members States free to use it if they so choose also in their international traffic can bring savings in costs and emissions, can contribute to better and more interoperable road transport, as well as better interactions with other modes (more comments under initiative 6).

Initiative 28: Vehicle labelling for CO2 emissions and fuel efficiency

In principle, CLECAT would welcome an extension of the car labelling Directive 1999/94/EC⁵ to light commercial vehicles as it could represent a useful incentive for fleet renewal. As the Commission pinpoints, a more uniform approach to the provision of information concerning the performance of vehicles is of particular importance.

Initiative 29: Carbon footprint calculators

CLECAT supports this initiative and would like to stress the important role that the Commission should play to encourage the rapid development of standardised technologies for such tools. We also agree with the Commission that what is needed is not a multitude of systems of carbon and environmental foot-printing of transport services, but instead the development of a simple, efficient and widespread scheme.

CLECAT also supports the ongoing work in CEN/TC 320 on this issue, while at the same time we regret that not all logistical activities have been included in the current proposal (exclusion of warehousing, for example). CLECAT is always in favour of a "well-to-wheel" approach in these calculations, as we believe partial appraisals may even become counterproductive.

Initiative 30: Eco-driving and speed limits

Examining approaches to limit the maximum speed of LCVs: In principle, CLECAT would have nothing against a speed limitation of LCV in urban context (§355). A broader scope on speed limits for road vehicles would have been however appreciated as speed limits in different Member States (mainly extra-urban and in case of road works) do not seem to obey the same standards. In some cases, they appear too strict and in others even too loose, which creates uncertainty and ends by encouraging careless behaviour.

⁵ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:31999L0094:EN:HTML>
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Eco-driving training and ITS applications: CLECAT supports the Commission's decision to include eco-driving requirements in future revisions of the driving license directive⁶ (§356). On this topic, CLECAT would like to underline that while professional drivers receive training throughout their careers, other road users have an equal responsibility for road safety, but they do not benefit from such regular trainings/check-ups and seem to be insufficiently aware of the speed regulations and safety distances, which tends to impair the manoeuvres of HGVs.

Initiative 31, 32, 33: Integrated urban mobility

As the Commission rightly underlines in paragraph 360, a single European solution may not actually fit the individual reality of urban areas of Member States because of the particular characteristics of cities throughout Europe. Moreover we agree with the Commission that urban mobility is not only a transport matter (cleaner and safer delivery of goods and services) but is a broader issue that must be accompanied with new societal behaviour in urban environment (§362). Efforts should nevertheless be made by the Commission in order to facilitate the appearance of new business models for urban freight logistics, in order to tackle the ever increasing congestion and the "last mile" issues. We are therefore pleased that the Commission has used the White Paper to announce several initiatives on urban mobility and would like to comment on them.

Urban mobility plans: Due to the principle of subsidiarity, the Commission cannot propose more than soft harmonisation measures and is right when it says that it is not its role to elaborate such plans but to actually establish procedures to facilitate their creation (§370). It is nevertheless important that subsidiarity does not further hamper the Commission from making local politicians understand that cities are part of a wider European logistics system, for instance by strengthening its help for coordination or by continuing to set up platforms allowing an efficient exchange of best practices.

An EU framework for urban road user charging: In principle, CLECAT would welcome an EU framework for urban road user charging because a multiplication of differing charging systems between cities would have very negative consequences for logistics and transport companies. We also appreciate the fact that the Commission did not forget the importance of interoperability standards for tolling equipment (§376). We however insist that earmarking should be made mandatory when setting up a harmonised charging scheme. Moreover, it is important that the Commission keeps in mind that pricing policy is not the panacea in order to optimise urban capacity and promote sustainable travel patterns (§375) and that incentives and promotion of best practices should not be left aside at EU level.

A strategy for near- 'zero-emission urban logistics' 2030: CLECAT obviously agrees with the Commission about the potential for technical and organisational innovation to improve urban logistics (§377). However, we consider that the solutions foreseen in the White Paper are unfortunately not sufficiently innovative. Apart from the Commission's determination to continue to foster dissemination and market uptakes, this White Paper does not contain new announcements/measures:

- Apart from promoting joint public procurement, no concrete actions are foreseen concerning the further implementation of cleaner urban trucks (§380)
- The benefit of using alternative vehicles for local distribution is already recognised (§379)

⁶ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:403:0018:0060:EN:PDF>

- Consolidation centres for urban logistics delivery cannot be considered as an innovative concept (§379), attempts in this direction have now at least a 20 year old case history: often they touch the limit of free competition vs. programmes.

In the attempt to foster zero emissions freight services, it must be noted that the urban environment is best placed to experiment in terms of electric vehicles. Some of our companies are engaged in such experiments in different areas of the world. Whilst we are unable to provide structured feedback at this point in time, we shall not fail to do so as soon as the situation is more stable. It is anyway essential to also think in terms of infrastructure for innovative parking, if this is a programme that will see a bright future.

Initiatives 34, 35, 36, 37, 38: Transport Infrastructure: territorial cohesion, economic growth and funding framework

The Commission has established a correct diagnosis of the current state of play of transport infrastructures in Europe. There has been too much underinvestment in infrastructure for several decades now, which now results in inhibiting economic growth and preventing mobility, and CLECAT would now like to comment on the initiatives underlined by the Commission to tackle this issue.

A core network of strategic European infrastructure – A European Mobility Network: CLECAT has at several occasions submitted its views to the Commission on the TEN-T policy review process⁷. As regards the latest developments, we are pleased to see that CLECAT's preferred option for the future TEN-T structure, the proposed dual layer planning approach with a comprehensive network and the core network, has been chosen as the preferred overall option by the Commission. We also see merit in incorporating the Green Corridors concept in the TEN-T, as it is a significant contributor to improving the European logistics environmental landscape. As such we think that the Commission should further explore the synergies and integrate the Green Corridors in the TEN-T network wherever possible.

Multimodal freight corridors for sustainable transport networks: CLECAT has also submitted its position on the new EU regulation on rail freight corridors⁸ and its upcoming implementation guidelines⁹, in which we underlined the importance of better including not only Railway Undertakings but also other applicants and logistics service providers in the governance structure of the corridors. In addition, CLECAT would very much welcome the idea of a European coordinator assisted by Commission services (§429) as we believe it could be a useful catalyst to bring partners together and foster the spreading of best practices in the corridors. We are also very pleased to see that the Commission stresses the need to improve the efficiency, reliability and accessibility of Single Wagon Load traffic to better exploit the potential of rail transport (§433) In such areas we believe automation has a lot to say. We look forward to the publication by the Commission of a proposal for a regulative framework ensuring open effective and non-discriminatory access to last mile. We hope in particular that the Commission will grant track access to rail services like marshalling yards and public sidings in a non-discriminatory way i.e. by opening the access to all operators and authorised applicants.

⁷ <http://www.CLECAT.org/dmdocuments/pp005osecr110221CLECATpostent.pdf>;

<http://www.CLECAT.org/dmdocuments/pp009osecr100906constent.pdf>;

<http://www.CLECAT.org/dmdocuments/pp008osecr090427greenpapertent.pdf>

⁸ <http://www.CLECAT.org/dmdocuments/pp002oetra090119eurorailntwk.pdf>

⁹ <http://www.CLECAT.org/dmdocuments/pp003oetra110127railguidelines.pdf>

Ex-ante project evaluation criteria: In principle, CLECAT would support the Commission's initiative concerning ex-ante project evaluation criteria ensuring EU added project value. Up until now, too many projects tend to postpone their final implementation and for this reason we believe that the Commission is right in further emphasising the time limit parameter in the procedures for projects overriding European interests (§443). CLECAT would also be in favour of stricter use of TEN-T funds, for instance by establishing a stricter "use it (well) or lose it" system for the funds. This could indeed contribute to overcome the problem that many projects have used up their allocation in endless preparation without any material achievements.

A new funding framework for transport infrastructure - Private sector engagement: CLECAT welcomes this initiative as we support the move toward the greater private sector engagement with PPPs and the "user pays" principle (§451) to assist Member States in their infrastructure investments, on the condition that **all** users are concerned (both private and professional) and the revenues are strictly earmarked. Concerning paragraph 457, CLECAT would support the set-up of a fair, common, harmonised and strictly earmarked infrastructure charging policy schemes like Eurovignette that would take into account two principles:

- all users should pay
- the smart use of charging to encourage the use of infrastructure in less congested areas and periods

Coming back to the private sector engagement, we remain cautious about the over-dependence from the private sector. CLECAT agrees that PPP's are very useful tools that have benefits not only for authorities, but also for specific companies/organisations; however the Commission should not consider them as surrogates of public investment in strategic infrastructure planning and construction. In other words strategic infrastructure must be built whether it elicits the interest of private investors or not, public funding must be available if necessary.

Initiative 39: Smart pricing and taxation

CLECAT supports the concept of smart pricing referred to by the Commission because we believe that smart charging and proper explanation of the factors which determine the charge might in the end influence the market to avoid ill-informed choices. It is however very important that the polluter-pays (§467) and user-pays (§503) schemes do not play one against the other or be confused with each other, i.e. polluter-pays should address externalities, whilst user-pays should be used only to pay infrastructure maintenance and construction.

The Commission must also understand that infrastructure charging alone certainly cannot provide the necessary funds; significant public investments also need to be made available during these decades. In this respect, we regret that the Commission has chosen to focus on price signals and did not take a more holistic approach on the topic of smart pricing. Indeed, we believe that the Commission could have gone farther (§469) in showing funding alternatives. Additional emphasis on combining price signals with other actions like technological innovation or incentives for fleet renewal could have been used. The EU can ensure an efficient reduction of externalities in the transport sector by making the policy choices that encourage transport users to adopt a "virtuous" behaviour, rather than limiting itself to placing discouraging price-tags on certain services. In this connection CLECAT maintains the view that all users must pay and commercial users should not be discriminated against.

As regards the issue of earmarking, CLECAT finds that the Commission remained too cautious and should have further stressed the importance that revenues generated from the polluter pay system are used first and foremost to address the externalities that create the charge (e.g. through technological innovations and infrastructure upgrading/construction) proportionally to

the costs actually generated. This would preserve fair competition between transport modes whilst contributing to the acceptance of the charging scheme, as rightfully pinpointed in paragraph 470.

Coming to road transport, CLECAT obviously welcomes the statement by the Commission stressing the need to accelerate the convergence of the national road charging policies, for instance throughout further technical interoperability of the European electronic tolling service (§482). We however regret that the Commission was not sufficiently clear concerning its intention to apply the user charging system to all vehicles: the White Paper was the opportunity for the Commission to show its determination to see the Eurovignette being applied to all road users (commercial and private) by the end of the decade, instead of considering it as a long-term goal that remains too vague to bring concrete results (§486). This objective, despite many others that will consume resources, only requires political courage and commitment to be implemented and to start producing all the resources that will be required in future. This is the action that can resolve the financing problems of EU transport infrastructures: we cannot afford a weak heart at this point, if we have to face intercontinental competition.

Concerning the reduction of externalities in rail, CLECAT believes that the retrofit programme suggested by the Commission (§488) represents a suitable method, as long as it is accompanied with actions promoting standardised technological improvement of the rail fleet. Earlier this year, we also welcomed the railway recast in which the Commission proposed the setting up of noise-differentiated infrastructure access charges¹⁰ (§489). We however deeply regret that the Commission did not explicitly announce the phasing in of a mandatory internalisation system before 2020 in the rail (§490) and in the inland waterway sector (§497). If the Commission was serious about achieving these objectives, it should have used more explicit language and given clear indications on the deadlines of such actions: this shows a certain lack of ambition and decision-making from the Commission. Protecting the railways from competition, as it is still incomprehensibly done, serves no purpose other than making it longer and more complicated for railways to become efficient.

The idea to internalise local externalities such as aircraft noise and NOx (§491) are only consequent when one wants to internalise all external costs of all modes of transport. Using airport charges for this purpose is preferred to a new kind of levy. Nonetheless we would like to remind the Commission of the possibility to achieve the same results (e.g. tackling airport congestion) by other means, for example the action proposed under item 3 in the White Paper.

In maritime transport, we have reservations about the way some of the externalities (§493) are being addressed, e.g. noise is perceived more acutely at harbours than at sea, i.e. it is more difficult to deal with it in areas where most EU citizens live. For this reason actions may be more effective where they are most urgent. Other externalities are very difficult to put a price on (alien/invasive species), but their impact on the sea environment is certainly not to be neglected (e.g. caulerpa taxifolia).

We are also extremely reluctant to accept the regulatory approach that was adopted through the mandatory use by 2015 of distillate fuels (0.1% mass sulphur content in fuels) (§496). The industry has voiced its concern about this measure, which threatens to seriously damage the European shipping industry. We wish to stress that the pursuit of a global solution is preferable rather than going forward alone.

¹⁰ <http://www.CLECAT.org/dmdocuments/pp001oetra110103jointposrailrecast.pdf>

Lastly we welcome the idea of the Commission to develop an approach to internalise external costs in inland waterway transport despite the obstacles of the Mannheim Convention et al. as to make for fair competition between modes. IWT environmental performance is good, but this does not mean that IWT does not produce externalities: these must be dealt with like in every other mode of transport.

Initiative 40: Transport in the World: The external dimension

CLECAT is of the opinion that many of the global problems also need to be tackled on a global level. While we understand the conviction of the EU and the importance to have frontrunners in finding solutions, there is the imminent danger of hurting the European industry in the process. In the best case scenario such initiatives could enhance the competitiveness of the European industry, in the worst case scenario it will impede on the competitiveness of the European industry. It is invariably a question of balance.

One current example is how to deal with emissions from maritime shipping. While there is general consent that emissions from shipping needs to be dealt with at global level (i.e. IMO) the EU has started the process of drafting legislation to tackle emissions from entering and operating in the EU. A similar example exists in air transport, where the Commission wants to regulate cargo coming from third countries. We fear all these efforts, while well-intentioned, are fated. The only promising approach to tackle global problems is cooperation, and that is cooperation on national and regional, but especially the global level. For that purpose the EU should keep discussion on all these levels under constant consideration.

We would like to take the opportunity and highlight the two most important actions under this initiative. As we have seen it is extremely important to extend internal market rules through work in international organisations (WTO, ICAO, IMO, UNECE, WCO etc) and wherever possible attain full EU membership within them. Only by becoming a full member in these bodies the EU will have the opportunity to make its voice heard and add authority to the discussions, where otherwise 27 Member States would voice individual concerns and pursue uncoordinated agendas. As a member of these organisations, it will be possible for the EU to promote European safety, security, privacy and environmental standards worldwide.

We also urge the Commission to take appropriate steps to advance the removal of exemptions for liner shipping conferences outside of the EU (§535). This is also a proposal which we strongly support, fully understanding the complexity and difficulty to pursue such an action.

Conclusion

Preparing a policy plan covering the next forty years is not easy, perhaps seven too ambitious, for a sector as varied and complex as transport, which was still in the infancy of containerisation and which was happily burning tons of oil not longer than 40 years ago. As a statement of intent, the White Paper is to be welcomed, regardless of whether or not one agrees with its contents. At the very least this represents the Commission's acknowledgment of our sectors role in ensuring economic growth. CLECAT however observes a few contradictions in current policies when compared with the ambitions of the White Paper: there are interests pulling in opposite directions when we consider IWT (good for curbing emissions but bad for the river

environment), the current debate relative to North Sea SECA¹¹ which might favour road transport at the expense of maritime, the ambition to transfer more cargo to the railway not seconded by the slow adoption of competition and the obstacles for authorised applicants to enter the rail market, the objective of reducing the externalities of road transport and the loss of sight of the environmental advantages of the EMS. These are but a few instances contradicting the objectives contained within the Commission's document and many more could be quoted. There is an impression of very good intentions accompanied by certain timidity in proposing any innovation that is even slightly confrontational; there is vision but there is also uncertainty.

CLECAT's view is that whilst the White Paper may show some flaws, its main foundations are sound, especially the premise that transport and oil must no longer be synonyms, whether oil will cease to be the global prime energy source or not, is very important. We would like to add that this is a strategic decision for the EU, considering the EU will just never be independently rich in oil. The moment the EU breaks free from its dependency on oil is never too soon.

Other themes such as the reductions in emissions and resolving congestion are obviously pertinent since relevant to all scenarios and should therefore be further explored and developed in future concrete actions. This is the area where probably there is an over reliance on charging policy. This will possibly procure higher revenues, but it is unlikely to steer the modal choices alone and more has to be done in order to make other modes attractive. We have spent certainly too much time and money in making road transport unattractive in the past, without any success. This White Paper should use its modal integration approach to finally dispose of the concept that some modes of transport are "better" than others. Firstly, because this is not true if we take a comprehensive look at their impact, and secondly, because we need them all to perform better in future.

The White Paper in many ways is looking back on history to solve our forthcoming problems. It relies on rail and maritime to resolve the twin problems of maintaining distribution to ensure prosperity and reduce emissions. However it needs to be noted that the Commission's expectations in the performance of these modes may be exaggerated and overrated, especially in freight movements. For example most rail freight is still far from being low in emissions, as it mainly moves burning diesel, even when we do not consider the noise factor.

The key issue will be how these plans will:

- Be adapted to meet the sector's concerns whilst reaching a balance with societal needs
- Be implemented through concrete actions with detailed deadlines
- Be used to develop new processes, regimes and conventions to facilitate the movement of cargo

What CLECAT strongly believes is that the transport industry needs a more prominent place in the EU policy agenda. In this light closer dialogue with the Commission is required in order to influence the overall policy, without forgetting that the private sector appreciates any attempts made to prevent these actions from becoming too bureaucratic. CLECAT Members can and will cooperate with the Commission to reach this important objective, which is essential for the EU to remain a principal global actor.

¹¹ http://ec.europa.eu/environment/air/transport/pdf/sulphur_standard_shipping.pdf

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