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Joint industry position paper on the European Modular System (EMS)

The European Modular System can significantly contribute to alleviating some of the concerns connected with the transport and logistics industry in Europe and its future development. The wider introduction of EMS in cross-border logistics operations in Europe would help operators and customers alike, optimising the utilisation of trucks and trailers, road infrastructure capacity, and integration with rail, air, inland and short-sea shipping for the door-to-door total logistics solutions.

The signatories to this document believe it represents an honest, unbiased attempt to present guidance to policymakers, who are sometimes faced with less than impartial information on this subject. These views and opinions are drawn on independent, impartial findings of the Commission and other bodies such as the European Environment Agency and the International Transport Forum.

Co-modal innovation

As industry stakeholders, we recognise that the transport sector must take its responsibility to significantly increase its carbon dioxide emission efficiency. We, therefore, welcome any measure increasing the efficiency and sustainability of transport in accordance with the principle of "co-modality".

Within the transport sector, it is specifically passenger cars and freight transport by road that account for the greatest share of greenhouse gas emissions. As regards freight transport, innovative solutions, completion of the Internal Market and new logistic approaches are required in order to further improve the efficiency of road transport; one approach is optimizing the transport chain by using intermodal solutions for greater quantities of goods.

As clearly stated by the 2006 Commission's Mid Term Review of the White Paper on Transport Policy, all modes of transport should be working to their full potential in order to achieve better co-modality. We believe the EMS is a step in this direction with the clear advantage of achieving an environmental improvement while at the same time supporting logistics efficiency and competitiveness.

The EMS is an innovative concept in the sense that it allows freight operators to work beyond the limitations applicable to other road transport vehicles operating on the road network. The EMS provides the possibility to use longer and potentially heavier vehicles, by combining existing regulated "modules" to be used on a dedicated road network considering local infrastructures and business situations.

- **Reducing fuel consumption and emissions:** Longer vehicle combinations improve fuel efficiency and **reduce CO₂ per unit of cargo carried**. For that reason, the EMS is an innovative tool that would help the EU and its member states to reach the targets set by the Kyoto Protocol and by the ambitious programmes set in the 20-20-20 declaration. A widespread use of EMS may contribute to absorbing the growth of demand by containing the overall number of commercial vehicles on the road. Such reduction can amount to savings in emissions of up to 30% per unit payload.

- **Reducing congestion:** An EU-wide introduction of the EMS would reduce congestion on the European road network and manage to meet difficult challenges. In the short term, it would alleviate the need for extensive investments in road infrastructure in many parts of the EU. Equally it may help to ease congestion in areas where such investments are not only costly, but also difficult or impossible. Another obvious advantage with the EMS is that these vehicle combinations occupy less road space for carrying the same amount of goods. This contributes significantly to reduced space occupancy (higher road space utilisation), which would be a significant benefit on certain congested parts of the European trunk-road network.

- **Supports intermodal solutions:** By using existing standardized EU modules, compatible with maritime and rail freight transport, unlike many existing articulated road freight vehicles and trailers (designed to maximise carrying capacity within current weight and dimension restrictions), the EMS will support an enhanced interaction with other transport modes. The EMS will therefore have a positive effect on the development of intermodal road-rail transport solutions, short sea shipping and inland waterway transport.

- **Flexible and easy to implement:** The EMS provides sufficient flexibility to enable vehicle and trailer combinations to adapt to different trade situations, volumes and fluctuating demand: it offers the possibility to use long combinations when possible and shorter combinations when necessary. As it is based on existing equipment (vehicles and load units), it is very easy to rearrange to shorter combinations and adapt to local conditions, customers' requirements, timing of delivery, etc.

There are a number of incorrect assumptions about the EMS that should be clarified:

- ***No increased risk of accidents with EMS:*** There have been concerns that longer vehicle combinations are less safe than shorter ones. The reality is the exact opposite. Real-life observations have shown that the number of accidents is directly proportionate to the number of vehicles (there being fewer vehicles if one uses EMS) and there is no evidence that EMS vehicle combinations create more accidents than shorter vehicle combinations. On the basis of existing evidence, the introduction of EMS will not result in an increased risk of accidents.

- ***No significant shift of freight from rail to road:*** Europe needs all modes of transport to be modern and efficient. Thus, we feel that the railway industry should not prevent the road industry to develop innovative tools like the EMS. Everyone would have reasons to rejoice if the rail industry focussed on its own innovation, rather than trying to impede innovation in other modes. All transport modes should be allowed to improve their efficiency, without unreasonable restrictions. This being said, the wider use of the EMS will certainly promote further development of intermodal road-rail transport. Moreover, there is no evidence that allowing EMS combinations would shift loads from rail to road: road and rail are complementary modes with limited commercial areas of competition. In the countries where the implementation of EMS has a historical perspective, there are no signs of modal shift from rail to road, to the contrary these countries have a higher share of rail freight transport in their modal split than the rest of the EU.

- ***No major investment in infrastructure is needed:*** EMS combinations are not intended to be used in city centres or other sensitive areas but to serve large terminals from which goods will be delivered by shorter combinations or single vehicles. It must also be noted that in principle the vehicles' weight per axel would either stay the same or decrease, thus resulting in less wear and tear on roads¹.

As stakeholders representing a substantial part of the European transport and trade related industry, we ask the EU Member States and the EU Institutions to consider the EMS for its own true worth and to re-think their strategy concerning the wider use of EMS within the EU.

In practice, some EU Member States already allow operation of the EMS within their own borders on a dedicated road network, but not for international operations. Those trials have shown overall benefits in terms of transport and emissions efficiency while not being a threat for road safety and infrastructures.

In addition, the results of the study initiated by the Commission on the "Effects of adapting the rules on weight and dimensions of heavy commercial vehicles as established within Directive 96/53/EC" headed by "Transport and Mobility Leuven", also concluded that the introduction of LHV's, like the EMS, is overall beneficial for the European society. A result recently confirmed by the JRC study "Introduction of mega-trucks".

We therefore call on the Commission to support cooperation between consenting EU Member States for EMS pilot studies and trials across borders.

We also believe that the Commission should encourage EU Member States to launch such cross-border trials and/or organise autonomous experiments.

¹ a 25.25 meter combination with a weight of 60t (2.4 ton/m) is likely to transmit less stress on a bridge than the 16.5 m long tractor and semitrailer combination allowed in combined transport with a weight of 44t (2.7 ton/m).

Conclusion

In conclusion, **the EMS is an efficient transport solution that is not only essential for the growth and development of the economy of a competitive Europe, it is also one of the most valuable tools to succeed in meeting the environmental challenges regarding air quality and global warming as well as having a positive impact on congestion.**

Interest groups supporting this Position Paper:

ACEA – The European Automobile Manufacturers Association groups the 15 major European car, truck and bus producers. The automotive industry is key to the EU economy, supporting 12 million jobs and driving innovation.

BCA – Belgian Courier Association, the representative voice of the express industry in Belgium.

CEPI – The Confederation of European Paper Industries represents the European pulp and paper industry towards the European Institutions. Through its member associations, CEPI also represents some 550 pulp, paper and board producing companies.

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

DSLVL – German Association for Freight Forwarding and Logistics.

DTL – Danish Transport and Logistics Association (DTL), which represents the interests of the Danish freight transport operators in road and rail and cooperate with local, regional, national and European authorities to advance the interests of freight transport.

ECA – Representing the interests of the European express and all-cargo airline industries to national and international regulators, the European Cargo Alliance is committed to fair trade and equal opportunities to compete in all world markets.

EEA – The European Express Association represents the express industry in Europe. The industry specialises in time-definite, reliable transportation services for documents, parcels and freight. It allows European business to rely on predictable, expeditious delivery of supplies, thereby enabling them to attain and maintain global competitiveness.

ESC – The European Shippers' Council represents the interests of European users of freight transport services in all modes of freight transport. Shippers are primarily producers of goods and services which they market, sell and distribute to their customers. ESC represents the interests of some 100,000 companies involved in international trade, within, to and from the EU.

EVO – EVO represents the interests of 30,000 companies in the Netherlands that have strong interest in continental and intercontinental transport and related services. Coming from all sectors of industry (wholesale, retail, construction, agricultural, etc.), Evo' members are users of all modes of freight transport: and present their views to decision-makers and authorities at all levels.

FEBETRA – FEBETRA is the Federation of Belgian Road Hauliers and Logistic Providers

FETEIA-OLT – Spanish federation of freight forwarders, Logistics and Transport Organisation

FNTR – FNTR (French Road Transport Employers Association) represents the interests of 12.000 road goods transport companies in France.

NSBS – The Bulgarian Association for Freight Forwarding, Transport and Logistics.

OTM – Belgian Shippers' Council represents the interests of the shippers in Flanders, Brussels and Wallonia. Their working field relates to all direct and indirect activities in the logistical area.

SA – The Swedish Association of Road Haulage Companies (SA), which is the trade association of the haulage freight industry in Sweden. SA supports our members with business development, public opinion and lobbying.

SAV – The Royal Professional Road Haulage Association of Flemish Region and Brussels Capital Region.

SIFA – The Swedish International Freight Association

TLN – The Dutch Association of Transport Operators and Logistics Providers.

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This joint industry paper is opened to further signatures of stakeholders sharing the same views on the EMS.

Should you like further information you may consult the following website: www.modularsystem.eu