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Regarding Modular System Questionnaire

The Swedish International Freight Association (SIFA, Sveriges Transportindustri-förbundet) is a branch association for logistical companies and freight forwarders in Sweden. You can find more info about SIFA on our website www.swedfreight.se/en/ . SIFA has a intermodal approach to freight transport issues and is an active participant in the transport policy debate in Sweden and in Europe.

SIFA has taken notice of the Stakeholders Questionnaire regarding “LHV, longer and/or heavier commercial vehicles”. Situated in Sweden, were 25,25 m and 60 tons vehicles has been allowed for many years and is considered as an normal part of the logistics market, SIFA takes the view that it is difficult to answer the detailed and sometimes hypothetical questions in the questionnaire. SIFA took part in the stakeholder meeting in Södertälje May 6th and we hope that some of the questions regarding the Swedish position on Modular concept vehicles was straightened out there.

In short, SIFA has the following comments on the issue.

- 1) Almost all forecasts for freight transport in EU in the future show a strong increase in overall demand. Even if every planned investment is rail and inland waterway transport is carried through, there is no possibility that these modes will be able to take care of more than a share of this increase. Road transport will continue to be the backbone of overland freight transport in Europe. Against this background, we must take care of every possibility to enhance efficiency and sustainability in all modes of transport. This is the co-modal approach that is reflected in the Half-term review of the White Paper on EU transport policy. Introducing the modular system in EU would be one important part of such a policy.
- 2) The growing political demand for lowering carbon dioxide emissions from the transport sector stresses the importance of creating a system that can transport more tonnes per vehicle with less emissions of greenhouse gas. All experience of the modular system has shown that it can contribute significant to this aim already in the short term. Fewer vehicles per tonne also create better traffic safety and less congestion.
- 3) In line with our first point, we cannot see that the modular system in any way should be seen as contrary to a policy for enhancing rail transport. As is well known, Sweden has a much higher market share for rail than EU generally, even if the Iron Ore Line Luleå-Narvik is excluded. There is need for a better rail

transport system in EU, both regarding infrastructure (dedicated rail corridors etc.) and market deregulation. But we cannot see that this would speak against introducing more efficient road transport as well. To hinder development in one mode can't be the way forward to promote another mode. All modes will be needed and must be as efficient as possible both individually and together. This view is also shared by the Swedish rail operators.

- 4) SIFA, with its intermodal focus, would also like to stress that the modular system in fact enhances the possibilities of efficient intermodal transport chains, since it is compatible with current container and swapbody dimensions in European traffic. In some cases it would be very clear that modular vehicles can contribute both to less congestion and enhanced competitiveness for intermodal traffic since more containers can be transported on the same vehicle than today. A 25,25 meter vehicle can also take care of 45 feet containers that is growing in numbers in the intercontinental trade and is currently creating a problem in EU legislation.
- 5) The modular system is created to be able to adapt to local conditions. Not all transports in Sweden and Finland is carried out by 25,25 meter lorries, and even fewer reach the allowed maximum weight of 60 tonnes. Vehicle combinations can be uncoupled and coupled for local adoption. The same will of course be the case if this modular system is introduced in other EU countries. The focus in the questionnaire on "longer and heavier vehicles" is thus somewhat beside the point. On the other hand, there seems to be very few reasons why a modular vehicle of 25,25 meters should not be able to use the great net of motorways on the continent, to and from terminals and ports.
- 6) Regarding the different types of vehicle configurations that are included in the questionnaire, it must be up to the market to decide on which configuration to use in different circumstances. We cannot see that there is any need for any specific regulations apart from allowing length and weight. In fact the directive 96/53/EC is already in place, and could be used for introduction of the modular concept in EU with some clarification regarding cross-border traffic. Since such cross-border traffic has been carried out between Sweden and Finland since more than a decade, the current prohibition(?) of such traffic should be declared obsolete anyway.
- 7) From our position, we would stress that the length limitation is the most important part of the system. Very few road vehicles in international transport is currently using the maximum weight. In the overall picture a 60 tonne weight is logical, but there is room for a possible introduction in steps if the 25,25 meters length is allowed from the start.
- 8) Since the modular system is well tested in "full scale" both in Sweden and Finland, and also during a time in Netherlands, and has a well documented positive impact on efficiency and sustainability, SIFA strongly urge the Commission to use the directive 96/53/EC to as soon as possible open for cross-border transport of 25,25 meters modular system vehicles in EU and, possibly after an introductory period, also 60 tonnes maximum weight.

SIFA also would like to support the views in the letter from Volvo AB on this matter. There is a strong support for the modular system in Sweden, including manufacturers, transport & logistics industry and the customers/freight owners associations. We hope that the on-going study will contribute to the quick adoption of the system in EU.

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