

The Swedish International Freight Association's comments on possible policy orientations of a planned logistics strategy**1 Introduction**

The Swedish International Freight Association (SIFA) has a wide adherence among freight and logistics enterprises in Sweden, which it represents before Government, in dialogues with parliament and in relation to other organisations. SIFA is one of the most important dialogue partners of the Swedish Authorities on matters relating to transport policy.

SIFA is also a member of CLECAT and, as such, supports the positions expressed in the consultation process on logistics carried out by the European Commission.

Nevertheless SIFA felt it useful to submit a number of comments in the context of the follow up to the consultation meeting. These comments are not intended to in any way distance the position of SIFA from that of CLECAT but, rather, to highlight a few items to which SIFA attaches particular importance due inter alia to the geographical situation of Sweden as a country situated in the periphery of the EU, with comparatively limited congestion problems, but with large areas with a low density of population and a network that makes complementarity of transport modes or heavy reliance on road transport a necessity.

2 Comments on specific items

Since SIFA shares the general philosophy behind the CLECAT position, that is, that while encouragement and drawing attention to the important role of logistics are useful, excess of regulation or introduction of steering mechanisms should be avoided.

This said, there are a number of points where there seems to be added value in initiatives to resolve specific problems. The following may be quoted:

- An exercise to identify and take measure to resolve bottleneck problems on the lines of the Short Sea Shipping bottleneck initiative. SIFA would appreciate to see such an exercise under way as soon as possible.
- SIFA also underlines the importance of the sustainability of logistics. Lines go out from this element of a logistics strategy to environment, but also, and possibly from a business perspective even more important, to the energy efficiency strategy which highlights optimal utilisation of resources (see COM (2006)545 final Action plan for energy efficiency, section 5.3).
- In relation to the matter of optimal utilisation of resources SIFA would particularly like to highlight the issues of terminal efficiency which seems to be related partly to the bottlenecks problem and partly possibly to capacity, that is to infrastructure needs, and the

need to revisit the rules on weights and dimensions of road vehicles (Directive 96/53/EC). Regarding the latter issue, SIFA maintains that widespread use of the modular concept, which the directive already allows, subject to notification to the Commission and in national traffic only, would provide an element of flexibility and optimal use of traction capacity. Tests in for instance the Netherlands seem to prove that the modular system optimises transport while reducing congestion and emissions. In the short term perspective, this would also make it possible to use 45 feet containers beyond 31 December 2006.

As already pointed out, the Directive already authorises use of the modular system. SIFA takes the view, however, that the Commission should start an objective information exercise, to eliminate a number of misapprehensions around the modular system. Likewise, it could be useful if the Commission were to address the issue of cross border traffic with modular system vehicle combinations between two adjacent countries both of which allow the system.

- Finally, on the liability issue, SIFA would like to draw attention to the NSAB 2000 standard conditions, that resolve the liability issue in intermodal transport and that are widely used in Scandinavia and Finland as well as the Baltic states. We attach a copy of this document to this letter.

Stefan Back
Secretary General & Managing Director

Swedish International Freight Association
Box 17114, 104 62 Stockholm
Besöksadress/ Visiting Address: Ansgariegatan 10
Tel no: +46 8 442 43 81
Fax no: +46 8 84 43 00
e-post: Stefan.back@swedfreight.se
Internet: www.swedfreight.se