



Public consultation on the report from the High Level Group chaired by Loyola de Palacio

Report on the extension of the major trans-European transport axes to the neighboring countries and regions

ECG (European Car-transport Group of interest) is the European association of 65 leading finished vehicles logistics companies in Europe and neighboring countries (see list of members attached) and it represents 80% of this market in Europe with a turnover of €11.5 billion and 43 million vehicles handled every year.

ECG has also:

44,000 employees

16,000 trucks owned/subcontracted

12,050 wagons

166 ships and 32 barges

421 compounds

64 million m² car park and 1 million m² workshop

One of the main activities of ECG members is to deal with transportation of finished vehicles by all modes of transport i.e. road, rail, sea and inland waterways. For this reason, ECG welcomes the initiative of the Commission to extend the major trans-European transport axes to the neighboring countries and regions. Trade does not stop at the boarder of Europe, especially in a more and more global economy.

ECG views expressed hereafter are therefore linked to the development of the vehicle industry, which, within Europe is moving every year further to the East. This creates and will create in the coming years a tremendous change in the flows and will give a crucial importance to the transport networks in these countries.

As the report states in its introduction *"a well functioning transport system connecting the European union and the neighboring countries is essential for sustainable economic growth..."*

As stated in point 3.2 of the report a priority axis could be a route that allowed traffic to avoid a major environmental bottleneck or barrier.

ECG considers these priority axes very important if they reach their goal of optimising the efficiency of the different modes of transport. The CARS 21 exercise the Commission did in 2005 with the vehicle manufacturers to help the European automotive industry to maintain and develop its competitiveness worldwide should be developed further with this initiative for the TEN and the coming papers of the European Commission on the mid-term review of the White Paper and the Recommendation on the logistics.

The automotive industry is moving to the East (new EU members States and neighboring countries even further to the East) and the logistics companies linked to this sector will strongly support initiatives aiming at better optimization of the transport infrastructures.

For this reason it is important that these main axes are considered as a special case and benefit from different criteria than usual networks in order to concentrate trade traffic on these routes. As stated in the report "traffic volumes between the EU and the neighboring countries are expected to grow by 100% between 2000 and 2020." Therefore special measures have to be taken for a smooth movement of the goods and growth development.

In the case of finished vehicles transportation, manufacturers of trailers already take into account the optimization of trailers. The aim is to maximize the number of cars being transported by one trailer, thus saving energy and environment. For this reason ECG considers important that, as regards road transport, the Commission considers maximum dimensions of **loaded** trailers, at least on these main axes, for trans-national transport. The dimensions are harmonized at the European level as regards the unloaded trucks and ECG does not ask to re-open this piece of legislation. However for loaded trucks, which is in the vehicle logistics sector very different due to rear and front over-hang possibilities, ECG considers crucial to allow longer trailers.

ECG studied the legislation with the EU 25 members and the practical use of it (see tables attached). In more than half of the countries (17 on 25) trucks can load longer than 18.75 meters or are accepted to do so. As a matter of fact, cars are bigger and bigger. Nordic countries have authorized modular systems (25,25 meters length), The Netherlands are having a successful testing phase for this and some others are considering starting a testing phase. For many years now ECG has been asking the Commission to consider longer trucks for international traffic at least and these main axes would be a very good testing area. Differences have to be made between the traffic in town and the trans-national traffic in big corridors with all the relevant safety measures.

As stated in the report environmental impact on transport infrastructures is very important and ECG would be very interested in participating in any working group on this and studying the impact of longer trailers when loaded to show the European Commission that a better utilization of the load space would increase the productivity and have a positive impact on environment by reducing the fuel consumption and then the pollution.

Road is not the only mode of transport and ECG members have been already using for many years intermodal solutions. However, to take an expression used by Mr. Barrot himself, "we should not kill the goose with the golden egg". As the report clearly states "*road transport will continue to be the dominant mode [of transport]*" paragraph 6.7.1. and therefore it is important to encourage other modes of transports by positive incentives without jeopardizing the road transport industry. Multimodal solutions have to be found out.

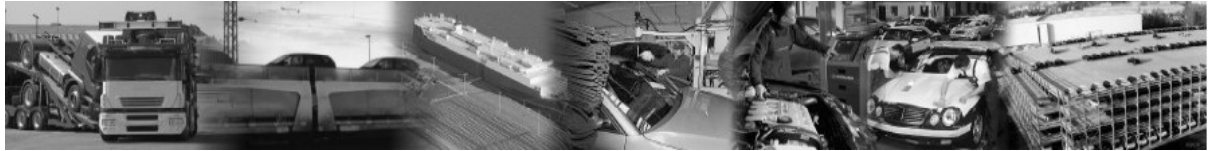
In the meantime efficient rail corridors have to be developed with Eastern countries in order to come up with better intermodal solutions. For this reason ECG welcomes the identified need for technical interoperability as "*a key element facilitating cross-border traffic and a major factor in the reduction of equipment costs.*" Paragraph 6.1. Harmonization as well as technical and administrative integration when relevant to the efficient operation of the selected priority axes and projects, as proposed in the report, would help a better use of the infrastructures and therefore a better efficiency which is vital for both the competitiveness of the European economy and for the environment.

As regards motorways of the sea, ECG welcomes the proposal to develop them as they are very important for the relations between Europe and neighboring countries. Car production has moved to the East and shipping solutions are very important for massive transfers. However ECG does not agree with the proposal to concentrate traffic to a limited number of motorways of the sea connections by limiting the investments to one port or port system per country per sea area. This would lead to congestion in the ports concerned leaving other port facilities unused. Shipowners go where their clients want them to go.



ECG Members (1)

- Adampol S.A.
- Aaçlı Petrol ve Ticaret Ltd. Sti
- Ambrosetti Autologistics Group
- Angelov
- Autolink AS
- AutoLogic
- Autopunktas
- Autoterminal, S.A.
- Autotrade & Logistics srl
- Autotransport Service AS
- Autoverslas
- Avtologistika Group
- Avtotransporti Kastelec
- Bergé Automotive Logistics
- Bertani Trasporti S.p.A.
- Internationale Spedition Willi Betz GmbH&Co.KG
- Broekman Group
- CAT Group
- Dansk Auto Logik A/S
- Dožas
- Werner Egerland Automobillogistik GmbH & Co. KG
- ECM (Vehicle Delivery Service) Ltd.
- E.H. Harms GmbH & Co.
- Gefco
- Gema-Trans
- Gintautas Navikas Enterprise
- Grayston
- Grimaldi Group
- JSC Hertransus
- Helf Automobil-Logistik GmbH
- Helicar s.r.o.
- Hesse-Noord Natie



ECG Members (2)



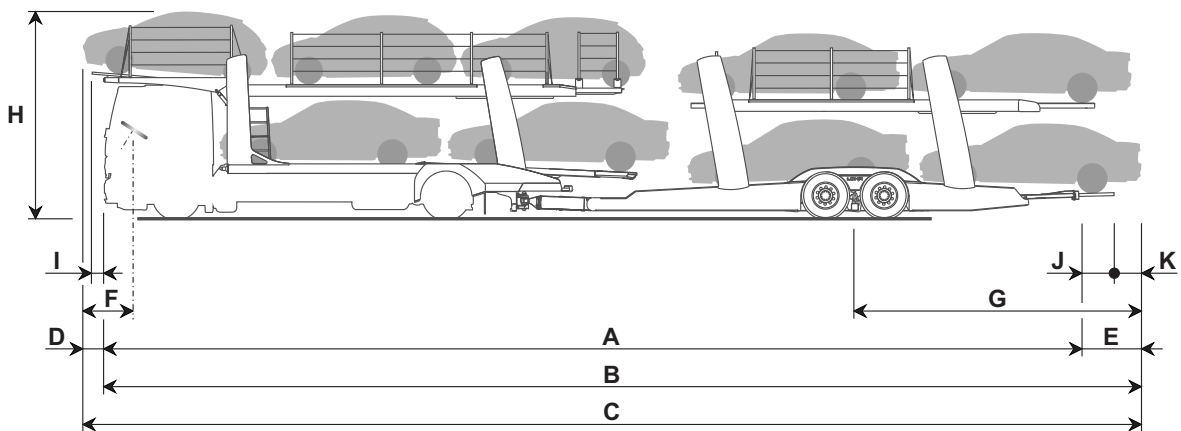
- Hödlmayr International AG
- İlçe Transportation Co
- Kapratas Logistic
- Köhler France sarl
- Koopman Transport B.V.
- Lagermax Autotransport
- Litra s.r.o.
- SE Mäkinen Transports
- Manvesta
- MAT Transport AG
- Mer-Trans Oto Transport & Trading Co
- Horst Mosolf GmbH & Co KG
- Mostva Sp. z. o. o.
- John Nurminen Oy
- Omsan Lojistik A.S.
- Otime Automotive Volume Distribution Ltd
- Sctrom S.A.
- Síntax Logística, S.A.
- AB SkandiaTransport
- Selamoglu Nak. Ve Tic A.S.
- STVA Group
- TEA
- Terra Handels- und Speditionsgesellschaft
- Toquero Group
- TRADISA (Transportes y Distribución, S.A.)
- Trapiser, SL
- UECC (United European Car Carriers)
- VEGA International Car Transport & Logistics
- Verbrugge Terminals B.V.
- VEVA Lojistik A.S.
- CJSC Vytaro Transportas
- Wallenius Wilhelmsen Lines
- Wega A



	SPECIAL RECOGNITION FOR CAR TRANSPORTERS	MAX. UNLOADED LENGTH (m)	MAX. LOADED LENGTH (m)	MAX. LOADED HEIGHT (m)	MAX. FRONT OVERHANG (m)	MAX. REAR OVERHANG (m)	AVERAGE Nbr. of LOADED CARS		
							LENGTH 3.82 m SMALL	LENGTH 4.48 m MEDIUM	LENGTH 4.80 m LARGE
A AUSTRIA	Yes	A 18.75	B 19.75	H 4.00	D No	E 1.00	10	9	7
B BELGIUM	Yes	A 18.75	C 20.75	H 4.00	D 0.50	E 1.50	10	9	8
CY CYPRUS		A 18.75							
CZ CZECH. REP.		A 18.75	20.75	H 4.20		<i>Must not exceed 1/3 of total length, max. length of overhang must not exceed 2.50</i>			
D GERMANY	Yes	A 18.75	C 20.75	H 4.00	D 0.50	E 1.50	10	9	8
DK DENMARK	No	A 18.75	C 20.75	H 4.00	D Not clearly regulated* *Within the limit of 20.75 m	E 2.00* K 0.40	10	9	8
E SPAIN	Yes	A 18.75	B 20.55	H 4.00	D No	E 1.80	10	9	8
EE ESTONIA		A 18.75	18.75	H 4.00					
F FRANCE	Yes	A 18.75	B 20.35	H No legal limit	D No	E 1.60	11	10	9
GB UNITED KINGDOM	Yes	A 18.75	C 22.75	H No legal limit	D 2.00	E 2.00	12	11	10
GR GREECE	No	A 18.75	A 18.75	H 4.00	D No	E No	9	7	7
HU HUNGARY		A 18.75	18.75	H 4.00		E 2.00, but max. allowed length : 1/2 of loading area			
I ITALY	Yes	A 18.75	C 21.00	H 4.20	D/E 2.25* *Within the limit of 21.00 m		11	10	9
IR IRELAND	No	A 18.75	B 21.75	H No legal limit	D No	E 3.00	10	9	8
L LUXEMBOURG	No	A 18.75	C Authorizations on a case by case basis	H 4.00	D No	E No	10	9	8
							With an authorization allowing a loaded length of 20.25 m		
LT LITHUANIA	No	A 18.75	A 18.75 with a permission to 19.75	H 4.10	D No	E No			
LV LATVIA		A 18.75	18.75	H 4.00					
MT MALTA		A 18.75	18.75	H 4.00					
NL NETHERLANDS	Yes	A 18.75	C 20.75	H 4.00	D 0.50* *Within the limit of 20.75 m	E 2.00*	10	9	8

	SPECIAL RECOGNITION FOR CAR TRANSPORTERS	MAX. UNLOADED LENGTH (m)	MAX. LOADED LENGTH (m)	MAX. LOADED HEIGHT (m)	MAX. FRONT OVERHANG (m)	MAX. REAR OVERHANG (m)	AVERAGE Nbr. of LOADED CARS		
							LENGTH 3.82 m SMALL	LENGTH 4.48 m MEDIUM	LENGTH 4.80 m LARGE
P PORTUGAL	Yes	A 18.75	B 20.00	H 4.50	D No	E 1.25	11	10	9
PL POLAND	No	A 18.75	<i>B 20.75</i>	H 4.00	D No	<i>E 2.00</i>			
S SWEDEN	No	A 25.25 * <small>* modular system</small>	A 25.25 * <small>* modular system</small>	H No legal limit	D No	E No	13	12	10
SF FINLAND	Yes	A 25.25 * <small>* modular system</small>	A 25.25 * <small>* modular system</small>	H 4.40	D No	E No	13	12	10
SI SLOVENIA		A 18.75	<i>B 21.00</i>	<i>H 4.20</i>	D No	<i>E 2.25</i> <small>With complementary marking light features (flashing light + red and white rear plate)</small>			
SK SLOVAK REP.		A 18.75	<i>18.75</i>	<i>H 4.00</i>		<i>Must not exceed 1/3 of total length, max. length of overhang must not exceed 2.50</i>			

BG BULGARIA		A 18.75	<i>18.75</i>	<i>H 4.00</i>					
CH SWITZERLAND	Yes	A 18.75	C 20.35	H 4.00	F 3.00* <small>*Within the limit of 20.35 m</small>	G 5.00* <small>*Extension</small>	10	9	7
N NORWAY	Yes	A 18.75	C 20.00	H No legal limit	D 1.00* <small>*Within the limit of 20.00 m</small>	E 1.00*	10	9	8
RO ROMANIA		A 18.75	<i>18.75</i>	<i>H 4.00</i>					



IMPORTANT

Some dimensions are subject to special authorizations.
For more information please contact us.

In italics : data collected from non-official sources and therefore needing to be confirmed by local authorities; it is the responsibility of the forwarding and the transport companies to verify the specific regulations enforced on every itinerary.