

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

Workshop on the European Modular System

June 24<sup>th</sup>

Organised by

**European Commission: DG TREN**



# Who are we

- n EU level industry representatives of
  - Express couriers and delivery service providers
  - Freight forwarders
  - Logistics service providers
  - Movers
  - Road transport operators
  - Retailers
  - Shippers
  - Traders
  - Vehicle Manufacturers
- è About 90% of freight related interests in volume in the EU

# The elements of our position

- n The transport sector is still responsible for increased green house gas emissions, both in passengers' and freight:
  - In view of the sheer volumes of cargo transported by road the road transport sector is responsible for the largest share in emissions.
  
- n As regards road freight transport, innovative solutions and new logistic approaches are required in order to further improve the efficiency of road transport
  - This can contribute to optimizing the transport chain by using intermodal solutions for greater quantities of goods.

# The elements of our position (cont)

- n 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 at the best of their potential in order to achieve better co-modality...
- We, as industry stakeholders, believe that the EMS is a step in the right direction:
  - It allows clear environmental advantages
  - It does not damage logistics efficiency
  - It improves EU logistics competitiveness.

è All transport modes should therefore be allowed to improve their efficiency, without unreasonable restrictions.

# What is the EMS

- The EMS is an innovative concept providing 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
  - Adapt the combinations to customers’ requirements and infrastructure constraints
- The EMS allows freight operators to work beyond the general limitations that are imposed on road transport vehicles
- The EMS is a step in the direction of a harmonised road transport market in the EU

# Many advantages

n The EMS reduces the fuel consumption and therefore the emission of CO<sub>2</sub> and other harmful gases:

- Longer vehicle combinations improve fuel efficiency and reduce CO<sub>2</sub> per unit of cargo carried;
- It would help the EU and its member states reach the targets set by the Kyoto Protocol and by the 20-20-20 declaration.

n The EMS reduces congestion:

- It alleviates the need for extensive investments in road infrastructure related to its insufficiency in very many areas of the EU;
- It occupies less road space for carrying the same amount of goods. This contributes significantly to reduce space occupancy, even during idle times.

# Many (more) advantages

n The EMS was thought for (in Sweden), and supports intermodal solutions:

- It is conducive to co-modal (intermodal) logistics operations due to the standard loading units being the same that are used in maritime and rail and combined freight transport;
- It will support an enhanced interaction with other transport modes as it will have a positive effect on the development of intermodal road-rail transport solutions, coastal shipping and Inland Waterway Transport, by reducing some of the costs.

n The EMS is a flexible tool easy to implement:

- Based on standard modules, it gives high flexibility to adapt the vehicles to different situations, and 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.

# Dispelling Incorrect Assumptions

- n No Increased risk of accidents with the EMS:
  - The number of accidents is directly proportionate to the number of vehicles and there is no evidence that longer vehicles are likely to create more accidents than shorter;
  - Evidence exists today that the use of longer trucks has a neutral or positive impact on road safety.
  
- n The EMS does not 'steal' goods away from rail or combined transport:
  - It will certainly promote further development of intermodal road-rail transport as the dimensions of the truck modules are fully compatible with those of the rail freight wagons;
  - Road and rail are complementary modes with limited commercial areas of competition.
  - Countries that have implemented the modular system score systematically higher in the rail share in the transport mode split than those where the EMS is not allowed.
  
- n There is no reason why rail transport should be unable to become more efficient: longer and heavier trains can be organised on the rail as well, with great advantages for the customers and the environment
  
- n The EMS is a longer, though not necessarily heavier, vehicle

# EMS and infrastructure

- n No major investments in infrastructures are needed:
  - EMS is useful to serve multimodal terminals from which goods will be delivered by shorter combinations or single vehicles in the so called "last mile":
    - n The hub-and-spoke system is already in place, it just need sto become more efficient.
  - In principle the vehicles' weight per axel would either stay the same or decrease, thus provoking less tear and wear on roads;
  - A 25.25 meter combination with a weight of maximum 60t (2.4 ton/m or less) is likely to transmit less stress on a bridge than the 16.5 m long tractor and semi-trailer combination allowed in combined transport with a weight of 44t (2.7 ton/m);
  - Bridges, fly-over's and other passes that allow HDV's can handle EMS without problems, all other already have limitations in place

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 and not obstruct adjacent EU Members States that allow these combinations to use them in cross border traffic.

# Our request

- n The EU current regulatory basis for EMS, the Directive for weights and dimensions of heavy commercial vehicles, 96/53/EC, enables Member States to introduce EMS in their territories, but it omits to address the issue of cross-border traffic
  - Contradictory legal interpretations with regards to its international use have not provided the legal certainty that would facilitate an extended use of the EMS.

## FOR THIS REASON

- n We ask for a clear and definitive decision that allows cross-border use of EMS between MS's if they wish to do so.
- n We ask for the Commission to encourage EU Member States to test and to cooperate for EMS trials across borders and/or to organise autonomous life-size experiments
- n We seek the confirmation, from the Council and the Commission, that the EMS can legally operate between consenting member states.

# What do we get in the end

- n Some internal barriers of the EU road transport market being lifted in favour of the transport common market, for greater efficiency of EU logistics.
- n The wider introduction of EMS would help operators and their customers find ways to optimise their road freight and especially their intermodal and combined transport requirements by granting:
  - Increased efficiency in road transport emissions
  - Contained road leg costs, allowing greater use of intermodal transport solutions
  - Less congestion, especially in sensitive areas such as ports, terminals etc.
  - Contribute to making multimodal and combined transport more competitive

# One conclusion

The EMS is not only an efficient transport solution that is essential for the continuous 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

**Thank you!**

**Our joint industry paper is still open to  
additional signatures!**

Should you like further information, you may consult the  
EMS website at: [www.modularsystem.eu](http://www.modularsystem.eu)