



NORDISK
SPEDITØR FORBUND

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**European Commission
Directorate General for Energy and Transport
Unit B2 – Trans-European Network policies
1049 Brussels
Belgium**

Nordic Association of Freight Forwarders comments to the European Commission concerning the Report from the High Level Group on the extension of the major European Transport Axes to neighbouring countries and regions – Networks for Peace and Development

Nordiskt Speditörförbundet, NSF, (Nordic Association of Freight Forwarders), hereinafter “the Association” was founded 1920 and organises Nordic logistics providers and freight forwarders through their national associations, namely Danske Speditører (Danish Freight Forwarders’ Association), Suomen Huolintallikkeiden Liitto ry (Finnish Freight Forwarders’ Association), Logistikk- og Transportindustriens Landsforening (Norwegian Logistics and Freight Association) and Sveriges Transportindustriförbundet (Swedish International Freight Association). Their close to 750 member companies constitutes the absolute majority of the logistics and forwarding companies in the Nordic countries.

The objective of NSF is to promote the interests of its members by coordinating their national points of view and representing them before Nordic, European and international bodies and institutions; by supporting information and training and by safeguarding and developing the General Conditions of the Nordic Association of Freight Forwarders, NSAB, the first edition of which was published 1919 and now, as an Agreed Document between the customers’ associations and NSF since 1959, is in its version 2000.

NSF appreciates having been given the opportunity to submit its views on the Report and has the following comments.

The configuration of the transport axes

Regarding the corridors suggested by the High Level Group, NSF will only comment on the Northern Axis and the link to the Sea Motorway of the Baltic Sea. The Association does not see any real problems as regards the configuration of the axis, nor as regards the projects defined within this axis in a short – medium term perspective. The Association nevertheless feels a bit hesitant when seeing that the corridor St Petersburg – Vartius – Tornio – Haparanda – Narvik has been included, and therefore question if there is currently a sufficient traffic basis on this route for it to already be selected as a transport corridor in this context. NSF questions whether the High Level Group is not in fact seeing this corridor more as a project for the future, a conclusion that is sustained by the fact that no projects have been selected on this corridor. We would therefore like to raise the question if it might have been more appropriate, bearing in mind inter alia the penury of resources available in a strained budget situation, not to make this corridor part of the Northern Axis at this point in time, but possibly take the matter up in the context of one of the upcoming reviews of the network foreseen by the Report, if then motivated by traffic development.

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The Association supports the measure to draw the Northern Axis toward Asia via the Trans-Siberian railway. Already now, a number of transport companies take an interest in the potential of such a transport corridor.

Regarding the link to the Sea Motorway of the Baltic Sea, NSF takes note of the recognition of the big and growing need for capacity in the Baltic and the need for a well developed harbour network. As far as we are concerned, we make the assessment that the expansion of freight transport in the Baltic Sea is such that no particular measures to concentrate the flows are required or even desirable. Rather, we take the view that the current situation may give room for participation by an increasing number of ports in a network and to develop land – and sea links to and from bigger harbours within the framework of a Sea Motorway concept in the Baltic. In our opinion this development should be driven by the needs of the market.

Horizontal Measures

NSF appreciates that the Report attaches great importance to facilitation of intermodal transport and various measures to improve the flow of goods, without expressly seeking a modal shift.

We support measures such as development of IT – routines, system for tracking/tracing of consignments of goods, more flexible and rapid routines at border crossings, improved interoperability, technical, legal and administrative harmonisation when this gives added value.

Regarding the Motorways of the sea, NSF welcomes the will to concentrate transport flows. In the Baltic Sea area, NSF holds the opinion that a network with a wide coverage should be sought, for the reasons mentioned above. We also welcome the fact that the Report expresses its support for a strengthening of Harbour resources in the Baltic.

An important issue for the Northern Axis also stated in the Report, is regarding trucks with a maximum axle pressure of 11,5 tonnes and a maximum height of four meters. The modular system that it is now generally held that all EU member states entitles to use the modular system in accordance with the wording of the Directive on weights and measures of Heavy Goods Vehicles. NSF find that the modular system could be well suited to be used on the long stretches, often through areas with low population density and low traffic, that are at hand on many of the land links that are at issue concerning the Northern Axis.

Finally, we wish to recall the Finnish Trans log P project, to develop and facilitate transports to and from Russia. NSF intends to revert to this project regarding the organisational form for cross border cooperation around transport projects.

Financing

The Report rightly points out that the EU budgetary resources for infrastructure investment during the next programming period, that is 2007 – 2013, will be fairly scarce. This would seem to apply as regards TEN T resources for investment within the EU, regional funds and resources for the neighbourhood policy.

NSF shares the view in the Report that banks such as EIB, EBRD and the World Bank could play an important part in financing sound and feasible projects along the prioritised corridors and to carry out horizontal measures

We also share the opinion of the Group that projects of the kind that are at issue in this context will normally be dependent on public funding, but that there may sometimes be circumstances that motivate private investment and that the legal framework for PPP:s must therefore be as certain, clear and open as possible. Although it is important to remember whether it is realistic to believe that such charges in regions with low population density and low traffic should be used as a means to influence the choice of itinerary.

Co ordination

NSF shares the thoughts advanced in the Report as regards the usefulness of designing co – coordinators also for these corridors. It may be assumed that it is also often useful to have some kind of secretariat and steering groups, with representatives of the parties concerned and financial institutions. On the other hand, we find it difficult to see the added value in formalising co operation through a formal treaty. Instead we would like to draw attention to the working method suggested for the Trans Log P project proposed by Finland, with working groups with representatives of member states and neighbouring countries concerned, industry in a wide sense, which are both operators and users and also Credit institutions.

Best regards,

On behalf of the Swedish International Freight Association,

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