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CONSULTATION DOCUMENT ON LOGISTICS FOR PROMOTING FREIGHT INTERMODALITY

**Comments and contribution to the Consultation
by
ECTRI
(European Conference of Transport Research Institutes)**

A. General Comments on the proposed EU Approach to establishing framework conditions for European in intermodal logistics

Establishing Intermodal transport chains through logistics solutions and making that a primarily business – related activity has rightly been identified in the EU approach as the cornerstone of EU policy in this field. Equally important is the notion that the EU and the National Authorities have a clear role to play in creating the appropriate framework conditions that would enable businesses to adopt intermodal solutions.

However, in the Consultation Document it is not very clear how these conditions will be created or what is the overall approach and strategy for doing so, although the individual references to elements of the whole issue (most notably in Chapters 3 and 4) are of course widely accepted and well established principles.

We believe that a focussed and concise document that would form the EU strategy in this domain must start by looking at the specific current bottlenecks and hindrances to intermodality in Europe. Based on this, it should then proceed to identify the specific policy initiatives that would aim to overcome the various obstacles and create the appropriate “framework conditions” as mentioned above.

ECTRI thinks that these conditions should relate to the following key elements (thus making it appropriate that any future policy document should refer to these elements consistently):

1. Intermodal technology penetration and conditions for the wide use of this technology (especially by SMEs),
2. Standardisation issues
3. cost and pricing issues,

4. Developing the capacities of enterprises (especially the SMEs) to manage and operate complex intermodal logistics systems,
5. Planning and promoting of key intermodal infrastructures (most notably Terminals),
6. Human resources development issues, and
7. Creating conditions for information availability at all levels.

These 7 key elements must be looked at in a concise and consistent way within the frame of an effective Strategic approach that has to be put in place.

We would add that establishing greater use of intermodality in Europe also requires a consistent implementation – deployment plan for all policy actions that would put in place a systematic overall approach in an effective policy implementation – monitoring – correction mechanism in line with Transport and other policy areas like competition, regional development, and environmental policies.

B. On the suggested European Quality approach to promoting intermodal Logistics

ECTRI agrees with the suggested Quality approach elements namely concentrating on:

- Certification of (intermodal) quality
- Sorting out the liability issues, and
- Promoting intermodality.

We would suggest that promoting or facilitating the adoption of uniform standards must also be visibly shown as another element here. Standardisation is an “Authorities task” that would greatly enhance “quality” and facilitate the market in investing and adopting intermodal transport solutions. Standardisation work must therefore be added to the list of Quality related issues.

C. Comments on the individual Actions suggested

A first comment here is that although there can be no disagreement with the individual actions suggested in the Consultation paper, their list is far from being comprehensive or sufficient. We would suggest that first of all these actions must be mentioned under the headings of the 7 key elements mentioned in section A above, or may be “synthesised” a bit further under four headings as follows:

- a. Developing soft and hard infrastructures for intermodality
- b. Facilitating the appropriate market conditions for intermodal transport services
- c. Allowing or facilitating new organisational and management structures
- d. Broadening our knowledge base.

ECTRI cannot, within the framework of this response to the Consultation paper, go into details as to the individual measures and actions that could be taken under each of the above headings. These can easily be found in the documents that accompany the Consultation paper

or the many studies and research that the Commission and National governments have conducted in recent years.

ECTRI reserves the possibility to offer its experience, know how, and good services towards this end in the future steps of the process, and gives as first contribution its suggestions under point D below.

D. Further individual actions suggested

The following are given as an indicative list of potential actions to be considered and discussed in further steps of the procedure. The list is not meant to be conclusive or exhaustive.

DEVELOPMENT OF “INFRASTRUCTURE”

- Further development of efficient and forward-looking transshipment technologies to be used in intermodal transport chains. Because of their modular structure such techniques, which are suitable for the transshipment of standardised load units, have to guarantee for the flexible adaptation to a user-oriented operation and for the optimal integration into internal and external materials flow systems.
- Development of materials flow-related, stationary and mobile devices for handling, order-picking and packing using progressive concepts and components. Modern mechanical concepts such as multi-arm robots and axle changing systems are realised in form of modular systems in lightweight construction. Development of decision-finding criteria as well as strategies for use and disposition in order to integrate the mentioned systems into overall logistic solutions.
- Development of measuring and testing systems for the acceptance of packaging in containers.
- Development of new identification systems using new coding procedures with the aim to extend the field of use and the life span. Standardisation of the storage forms and the data transfer. Fields of application: identification and analysis of packaging and container characteristics, especially for the assessment of transport damages.
- Concepts for the location / navigation of vehicles. Further development of suitable and new processes for the identification, tracing of goods, containers, vehicles etc.
- Further development of strategically placed Intermodal Terminals especially in the new member states.

STANDARDISATION ISSUES

- Standardisation of the geometric dimensions and weights of load units and small containers (focus on 800x1200 Euro-pallets, 1000x1200 industrial pallets, 600x800 Euro-pallets 2 and other display pallets as well as on containers smaller than 5").
- Generation of packing patterns for the building of optimal load units.
- Development of processes for the automated building and break-up of load units.
- Standardisation of quality standards for loading aids and containers.
- Definition of transitions between different services (the different services of different information providers must be harmonised. A transition between the services includes the definition of data formats, semantics and exchange procedures);
- Definition of intelligent information systems and user interfaces with respect to different user qualifications classes, including advanced navigation methods;
- Definition of telecommunication profiles;
- Definition of interfaces to data management systems (especially distributed systems):
- Definition of system and security management functions;
- Definition of recovery procedures for distributed systems (e.g. backward versus forward error recovery):

INTERMODAL LOGISTIC CONCEPTS AND LOGISTIC MANAGEMENT FOR EUROPEAN ENTERPRISES

- Development of assessment methods for an integrated analysis of the procurement markets and suppliers. In order to simplify the complex decision-making process;
- Development of a strategic decision-making instrument which allows for an enterprise-related optimal choice of transport modes but also for an efficient differentiation between single enterprises of the transport business.
- Development of a guideline for the determination of purposeful logistic organisational forms under consideration of European-side interfaces which are related to materials and information flows.
- **Development of intermodal concepts for dangerous goods movement.**

DEVELOPMENT OF TRAINING AND EDUCATION PROGRAMMES

- Standardization of training and education programmes in the field of intermodal logistics.
- Elaboration of position profiles for staff of logistic service companies (work to be done, qualifications required, performance evaluation).
- Supporting training actions with a view to understanding and managing of European-wide intermodal logistic processes or systems.
- Training on Legal and reliability - related aspects in the logistic chains.

OTHER ASPECTS

Waste Disposal and Reverse Logistics

- Development of identification systems and sorting techniques for the return of returnable glass containers and individual lots, especially under consideration of the liability under the law on product liability.
- Optimization of the materials flow in waste disposal logistics by the development of specific techniques for the collection, transport, transshipment, storage and treatment of materials to be disposed in order to increase the degree of automation.
- Reverse logistics concepts for transborder-operating SME's (open+closed systems).

Concepts for Traffic Congestion Avoidance

- Conception of traffic networks in hierarchical structure (related to EC, countries, conurbations) with the integration of all modes to line, product and market-oriented criteria.
- Development of new traffic management techniques by extending the traditional ones to fields of use such as around freight transfer or modal interchange terminals.
- Further development of freight distribution concepts for conurbations (City-logistics);
- Development of novel booking systems for freight, covering all modes of transport is an essential tool for the promotion of intermodal transport in Europe