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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Proposals for amendments to Annexes A and B of ADR: construction and approval of vehicles

Sub section 8.1.1

Transmitted by the International Road Transport Union (IRU)

Summary

Executive summary: The IRU and its Members support the Swedish document 2012/11 proposing the amendment of sub-section 8.1.1 by including “(...) *a semi-trailer coupled to a dolly shall be considered as one trailer*”. This solution would improve productivity, environmental performance and the principle of co-modality by offering better transport rather than more transport.

Introduction

1. During the last ten years, road freight transport, which is an essential production tool, has had an average annual growth of 2.8%. Unfortunately, the transport industry is facing an increased lack of capacity in freight transport.
2. Indeed, by reason of the inexistence of Ro-Ro services or inefficiency of rail services and in particular of rail/road services, road transport demand cannot benefit from any additional transport capacity resulting from the development of co-modality.
3. Therefore, to meet the requirements of globalisation, the road transport industry is currently suffering greatly from the increasing waiting times at borders, bottlenecks and dramatic driver shortages.
4. Currently, a major aim of the road transport industry is therefore to satisfy the increasing improved mobility demands of its clients by increasing the capacity of road freight transport, an objective which can only be achieved by facilitating and effectively promoting rail/road and Ro-Ro co-modality.

IRU Position

5. The Modular Concept consists of a number of vehicles and load carriers complying with EU-directive 96/53. The vehicles and load carriers are combined with one or two coupling units to produce a number of vehicle combinations with the maximum length of 25.25 metres.

6. The Modular Concept is allowed in Sweden, Finland and Portugal, allowed on dedicated roads in the Netherlands and tests are ongoing in Denmark and Germany.
 7. The Modular Concept efficiently contributes to diminishing the transport costs of any co-modality transport, such as rail/road or Ro-Ro transport. The IRU is in favour of the Modular Concept, which fits perfectly well within the EU principle of co-modality and shall also be used for ADR freight.
 8. In fact, as demonstrated by numerous tests and by more than ten years of experience in Scandinavia, the Modular Concept significantly contributes to the promotion of rail/road and Ro-Ro services not only on long distances of over 500 km, but also over medium distances of between 200 km and 500 km.
 9. This is why, to ensure the success of co-modality in the rail/road and Ro-Ro services, all freight transport modes, and not only road transport, should undertake major efforts to increase the reliability and efficiency of their services, rather than to protect their privileges by requiring new restrictive and coercive measures on their competitors' transport modes.
 10. In order to facilitate co-modality, the Modular Concept needs coupling devices and vehicle weights and dimensions to be harmonised and standardised.
 11. Today, many different types of truck-trailer combinations exist in all contracting parties. Most of them are still not adapted to co-modal transports. With the CEN approval of a swap body length of 7.82 m, the use of such swap bodies instead of fixed superstructures on trucks will be encouraged and promoted. The use of a dolly and semi-trailer, instead of a full trailer is also an advantage. In such cases the semi-trailers, like the swap bodies or containers, are fully suitable for rail/road and Ro-Ro transport operations.
 13. Based on the Scandinavian experience, use of the Modular Concept (25.25 m) has led to an increase of rail/road combined transport. This clearly shows that vehicle combinations using the load length of 7.82 m (swap bodies) and 13.6 - 13.72 m (semi-trailers) are the best harmonised combinations to effectively develop and promote co-modality.
 14. As described in the Swedish document 2012/11, the Modular Concept effectively allows:
 - an increase in road safety (better dynamic stability and braking performance than many conventional European combinations);
 - a reduction the number of trips by 32%;
 - a reduction in transport costs by 23%;
 - a reduction in fuel consumption by 15%;
 - a reduction of CO₂ by 15%;
 - reduced road wear and increased road space (less congestion);
 - an approach to counter the lack of drivers.
 15. The Modular Concept, which is the best tool to promote co-modality, offers BETTER TRANSPORT rather than MORE TRANSPORT and thus represents an answer from the road transport industry to better absorb the foreseen growth of freight transport in all ADR contracting parties.
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