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**MONITORING OF WEIGHTS AND DIMENSIONS OF LOADING UNITS IN
INTERMODAL TRANSPORT**

Transmitted by the International Road Union (IRU)

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GETC/G4751/JHU

Geneva, 19 June 2003

INTERMODAL LOADING UNITS

IRU POSITION PAPER

Introduction

In September 2001, the European Commission presented its “White Paper on European Transport Policy for 2010: time to decide”. The paper sets a number of targets to ensure competitiveness and sustainability of goods transport. The program on the promotion of Short Sea Shipping (SSS), which was published in April 2003, is one of the measures to cope with the expected increase in goods transport. The basic idea of the European Commission (EC) is to fully integrate SSS into the intermodal door-to-door supply chain.

A number of Community legislation are envisaged to promote SSS in Europe. One of the legislative actions is standardisation and harmonisation of intermodal loading units.

Proposal of an EC Directive on Intermodal Loading Units (ILU); COM(2003)155 final

The proposed Directive lays down essential requirements of harmonised standards and specific requirements for interoperability. It also defines harmonised standards and specific requirements aimed at the creation of a new stackable European Intermodal Loading Unit. Furthermore, it sets out obligations with regard to safety, conformity assessment and maintenance, as well as procedures for periodic inspections of ILUs.

The proposed Directive shall apply to:

1. existing ILUs (swap bodies or container) and
2. new loading units

The Directive proposed lists the following requirements for ILU:

Safety and security:	All ILUs must be equipped with anti-intrusion alarm devices, e.g. electronic seals.
Handling:	ILUs need to be stackable. ILUs must have top lifting capability.
Height:	2670 mm

Internal Length:	11 units of 1200 mm, for the long version. 6 units of 1200 mm, for the short version.
Strength:	ILUs must not break or open if they are accidentally dropped and ILU must be able to withstand everyday knocks during handling causing any damage which might lead to the false assumption that periodic inspection did not take place. ILUs must be stackable up to four loading units in sea conditions.
Identification:	ILUs need state-of-the-art electronic coding and identification.

These requirements of loading units are an addition to the requirements of the Directive 96/53/EC.

General IRU Position

Combined transport is needed for capacity reasons!

But:

- It has to be sustainable, following the IRU 3 “i” strategy, and
- Effective intermodal transport requires a correct price / quality ratio.
- The choice of the mode is a market decision.

IRU Position on ILU

In the White Paper, reference is made to intermodal transport units arriving in Europe from overseas or from non EU-members. This issue is not dealt with in the new Directive proposal. The IRU had hoped to see an EU initiative, realizing that the issue is complicated. The IRU refers to problems arising when 30’ and 35’ tank containers, 45’ and 48’ maritime containers as well as 8.5’, 9’ and 9,5’ jumbo containers arrive in Europe and have to be transported from the ports of entry. Adaptation of Directive 96/53 to this development would be an obvious task for the Commission services. A great part of these units are transported in Europe by means of intermodal systems, but very often problems occur both for rail and road.

Secondly, the IRU finds that the ideas in the proposed Directive focus too much on specific issues related to inland waterways (stackable swap bodies). Even if the IRU agrees with the need for a new standard for swap bodies to be used in road/inland waterways transport solutions, the road/rail and road/short sea shipping will, for many years, be the main answer to the need for developing intermodal transport.

Thirdly, the important combined techniques “unaccompanied rail/road transport with semitrailers”, “unaccompanied rail/road transport with tank containers” and “rolling highway” have not been taken into account.

Technical Measures

Technical harmonisation and standardisation are no doubt important for the promotion of intermodal transport. However, other initiatives than mentioned in the proposed Directive would have greater impact, e.g. increase of the maximum weight for transport of *all* intermodal units by road to 44 tonnes as previously proposed by the Commission as well as harmonisation of technical requirements and approval procedures for rail equipment.

Secondly, the standardisation achieved for swap bodies should in no way be jeopardized. Particularly the existing CEN standard for shorter swap bodies is to be upheld with its 3 length recommendations,

7,15 m, 7,45 m and 7,82 m without any priority for one of the dimensions. Further standards could be envisaged, e.g. including a height superior to 2670 mm and/or a width superior to 2500 mm, but such a standard should in no way have priority over existing standards.

The IRU disagrees with the call for *one* intermodal loading unit. In the opinion of the IRU, several standards are needed. The practical problems with the transfer of units at terminals are much less of a constraint than the capacity at terminals in some regions, the planning procedure for establishing terminals, restrictions for certain categories of goods at terminals etc.

Finally, the idea that *new* intermodal units would have to comply with the standard is considered a rigid measure with extensive negative consequences for road transport operators investing in equipment for combined transport, as they need a flexible system, where they can decide their investments according to the specific needs of their customers and on the markets where they operate.

Maintenance and periodic inspections

The IRU is not convinced of any need for new regulations regarding maintenance and inspection of intermodal transport units. The approval system for containers and swap bodies seems to function to the satisfaction of all parties involved. The proposed Directive contains no reference to safety statistics and no other indications about safety issues or damages. Assessment, reassessment and periodic inspection of equipment is an important part of the proposal but it should only be introduced with a clear understanding of the kind of problems such a system should solve and with cost/benefit analyses. Safety issues in combined transport are much more related to the complexity of the situation in each of the modes involved. The railway accident in Austria, where a number of lorry drivers using rolling highway were injured or even killed, is a tragic example of such issues, which have to be looked into.

Fiscal matters

The IRU regrets that there is no call for a harmonisation of the CIM agreement with the CMR convention in order to obtain compensation for users of intermodal transport in case of delays in the rail traction.

Conclusion

The road transport industry needs SSS for capacity reasons.

But!

Concerning the EC Directive on ILUs, the economic impact of the proposed measures for the road transport industry will be negative, mainly due to the limitations in the transport operators' possibility to react to market demands and due to high investments. The positive impact of standardisation of a stackable swap body for inland waterway transport will be limited. For the road transport industry, the new Directive on ILU is a step back in the improvement of intermodal transport.

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