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Working Party on Intermodal Transport and Logistics
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**MONITORING OF WEIGHTS AND DIMENSIONS OF LOADING UNITS IN
INTERMODAL TRANSPORT**

Transmitted by the European Barge Union (EBU)

“INTERMODAL LOADING UNITS – HARMONIZATION AND STANDARDIZATION INITIATIVE”

COMMENTS ON THE EC COMMUNICATION ON THE PROMOTION OF SHORT SEA SHIPPING

Introduction

In the past a lot of initiatives already have been taken through different organizations, to develop an intermodal loading unit (ILU). A few different ILUs are actually used; the so called “Geestcontainers” (45’ continental containers) are a common example in the containerized inland navigation.

The EC intends to stimulate the intermodal transport through a directive for the development of an EILU, a European ILU. The directive provides a few requirements with regard to safety, handling and measurements, based on which the European standardization institutes are asked to develop an EILU that meets these requirements.

We welcome the aim of the EC to support intermodal transport. We also welcome the intended standardization in this respect, taking into account the interest of inland navigation, where stack ability is a *conditio sine qua non*.

Looking at the content of the proposal it seems however that the EC will overshoot its purpose.

The proposed directive

The actual proposal seems to be mostly inspired by the promotion of short sea shipping. Other modalities get no chance. Taking into consideration the previous history of the drafting of this initiative, this seems a ‘slip of the pen’, as the inland navigation industry was emphatically involved in the process.

The quantitative comparison of different ILUs, from which appears that the EILUs are more efficient for the transport of pallets, seems to be based on not entirely relevant starting points. For example the long version of the EILU (13,20 m) is compared with a 40’ ISO-container (12 m), while the 45’ ISO-container (13,5 m), which is increasingly being used, is missing in the overview.

Measurements

A lot of the intermodal initiatives where inland navigation is involved origin from road transport. The key to modal shift lies mostly with the road transport. Therefore it is very important to draw up an EILU that utilizes these possibilities from the road transport as good as possible.

That does not alter the fact, that it is also of vital importance, to dispose of an EILU which can be used in inland navigation without too many adaptations on board of the vessels.

In this respect - almost unavoidable- problems will arise:

Concerning the width:

It is noticed in the proposal -relatively indirect- that the loading capacity for some of the barges will decrease, due to the fact that there can be placed only three EILUs beside each other on board, instead of four. This is a heavy underestimation of the problem: only three wide instead of four wide means a loss of the loading capacity of 25%, which consequently means that the introduction of an EILU from a commercial point of view will cause big problems.

Besides, contrary to what is suggested in the proposal, the adjustment of vessels, especially when for instance it refers to container cell guides, is a very expensive case. Till now all new vessels are built based on the width of the current sea containers. Also lock widths are based on these dimensions.

Concerning the height:

Also the height of the EILU is of relevance concerning the standard height of many bridges in Europe. The EILU is even notably higher (2,67 m) than a high cube ISO-container (2,59 m) which already causes a problem for a number of bridges. If one layer less can be carried as a consequence of the height of the EILU, the intended efficiency advantage concerning the number of pallets will be nullified.

Other aspects

We support the proposal for harmonization of the place and the draft of corner fittings, fork-lift truck pockets and the like. This makes it possible to handle the EILUs with the same equipment that is used for maritime containers as well and offers an enormous advantage in terms of costs. Moreover in this way the continental goods stream can 'join with' the maritime stream, which will stimulate the use of EILUs.

Although in the introductory text of the proposal the use of EILUs is left to industry on a voluntary base, the further text of the directive seems to be based on the contrary. After all: consideration 14 stresses that new ILUs only can be introduced in the market if they meet the requirements of the directive. Besides that in article 2 the directive is also explicitly declared applicable on ILUs and EILUs which already exist at the day of coming into force of the directive.

In that respect it matters how to handle with the today's usual measures of sea containers, by which world-wide transport is taking place.

To conclude

In theory the containerized inland navigation industry welcomes a standardized unit that can be used worldwide and which is the standard for the road transport in the European Union. However an introduction of a new standard measurement will have drastic consequences for today's material, terminals, infrastructure (locks, bridges etc.) and will consequently lead to big investments on many levels, when the proposed unit will be introduced.

Therefore we are afraid that the advantages won't balance the disadvantages.

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Brussels/Rotterdam, September 2003

The European Barge Union EBU was founded on 14 December 2001 by 8 national organisations representing the national inland navigation interests in six different European countries.

The association has its seat in Brussels, Belgium and in Rotterdam.

EBU represents the interest of inland navigation on a pan European level and deals with all questions, arising out of the future development of the inland navigation industry and inland waterway transport.

To realise this aim EBU deals with

- the development of the European transport policy
- the improvement of the economic position of inland navigation
- the structured cooperation with national and international institutions
- the exchange of information and experience between the parties involved
