

Position Paper

The European Voice of Freight Logistics and Customs Representatives And International Federation of Freight Forwarders Associations

Brussels, September 16th 2009

Re: ITF Stakeholder survey on innovation in transport

CLECAT and FIATA represent the interests of the vast majority of EU and global enterprises, respectively, which offer logistics, freight forwarding and Customs services. CLECAT and FIATA have therefore a first and foremost interest in innovative technologies connected with freight transport and, in a more indirect manner with fleet management. Our comments will therefore be limited to this scope of interest.

Deployment of innovative technologies such as ITS systems is important in order for the transport industry to be able to maintain or improve efficiency in spite of increasing problems, such as for example congestion. Freight movements, deliveries, collections, fleet managements etc. can also greatly benefit from interoperable and harmonised ITS instruments. For this reason, CLECAT and FIATA support the creation of conditions for a well-thought, interoperable and harmonised introduction of ITS systems in logistics and road transport in particular. A European framework and strategy to implement innovative technologies for freight transport in Europe would be supported provided such strategy is deployed in harmony with, and without the ambition to impose itself onto, the market.

This being said, we remind the reader that whilst CLECAT and FIATA recognise that innovative technologies can significantly contribute to mitigating congestion and creating the condition for a more efficient use of existing infrastructure, one should not see them as "miracle cures" that could substitute improvements in infrastructure maintenance or substitute badly needed investments in new infrastructure.

Short term deployment of innovative technologies

In CLECAT and FIATA's view, as long as interoperability is ensured in all MS's, the following are the most important innovative applications that have reached a mature technological stage and merit support in view of short term implementation:

- in-vehicle basic safety systems:

- Automated Emergency Notification: e-Call sending automatically the position of a vehicle involved in an accident to the rescue services
- Speed Alert: warning the drivers for not respecting the actual local speed limits
- in-vehicle Autonomous Advanced Driver Assistance Systems (ADAS) like:
 - Adaptive Cruise Control
 - Lane Keeping
 - Lane Departure Warning
 - Collision Avoidance
- Travel and Driving Support Services:
 - Real Time Traffic Information
 - Route guidance
- Traffic Management systems
 - Variable Speed Management
 - Queue tail warning systems
 - Dynamic routing and guidance in case of accidents
- European Electronic Toll Collection Service - enabling a driver to pay tolls or fees everywhere in Europe with one on-board equipment (despite the delay already accumulated in implementing Directive 2004/52 EC on the interoperability of electronic road toll systems in the Community)
- Parking Reservation and Guidance of road vehicles: pilot projects like SETPOS and LABEL have shown that the technology can be implemented and must now be widely deployed
- The European Modular System (EMS): it is an innovative concept as it allows freight operators to work beyond the limitations applicable to other road transport vehicles operating on the road network; it provides the possibility to use longer and potentially heavier vehicles, by combining existing regulated "modules" to be used on a dedicated road network considering local infrastructures and business situations.
- Systems for the Tracking and tracing of dangerous goods, even though existing regulations are generally sufficient to ensure safe transport of dangerous goods
- Real time bookings on to ferries and into terminals

Bottom up approach for developing a minimum level of standardisation for innovative technologies in transport

Large scale deployment of ITS technologies is obviously not easy; it has already taken a very long time for autonomous control to be deployed. Moreover, the most innovative technologies still need to prove their efficiency through cost and benefit analysis. In any case, CLECAT and FIATA believe that the achievement of an EU-wide standard in technology is unlikely to come to fruition so long as a merely voluntary approach for Member States remains; EU institutions should instead prescribe minimum interoperability requirements for all ITS related services.

This being said, in the pursuit of this minimum level of interoperability, it is important that aspirations to reach standardised solutions do not hammer development and business opportunities down. For this reason, it is important to avoid a top down approach on standardised solutions that might hamper business development. As we have underlined in our previous positions relating to innovative technologies, it is essential that businesses clearly see what their advantages for sharing information are in order to have a growing demand of ITS services.

Indeed, in order for innovative systems to be commercially interesting, one should not forget that the market of innovative technologies is a competitive area where stakeholders like forwarders, transport operators in various modes, customs, police, port security etc should be

identified as main customers whose interest for many of them is to reduce overall costs of transportation.

Based on these observations, CLECAT and FIATA believe that the development of innovative technologies in freight transport should be related to a bottom up approach (possibly facilitated by the EU Commission) where businesses' needs are visualized and published in the marketplace in order for them to become known and interesting for manufacturers to work on meeting such demand. On that matter, ITS application manufacturers have probably not done enough to make sure that the awareness of cost-benefit analyses gains public attention, especially vis-à-vis the private sector, i.e. their immediate and direct market. CLECAT and FIATA would also like to underline the need for EU institutions to continue to support ongoing business initiatives consisting of pilot and concept projects aiming at attracting companies to these reasonable and short-term efficient business models.

Issues for long-term deployment of innovative technologies

The ideal situation would be to develop a set of open standards that would make one common, open platform available in freight vehicles – a device based on common positioning and communication components - instead of separate platforms for each application. Right now, it seems that nomadic devices (handheld wireless devices such as the Personal Digital Assistants or advanced mobile phones) would be the first example of an open platform. However, CLECAT and FIATA prefer abstaining from choosing their own champions: it is preferable to let the market set its own goals.

As regards current R&D, it appears that more research is still needed concerning the following technologies:

- Approaching emergency vehicle warning
- Post crash warning
- Low Bridge warning
- Work zone warning
- Highway/rail collision warning
- Enhanced route guidance and navigation
- Development of applications that would improve the environmental impact of transport with for instance anticipatory eco-driving and emission driven traffic controls
- Automatic intervention of the vehicle when too closed to an accident
- Risk averse routing after informing the driver of an accidents

Moreover, in addition to issues of liability and data protection, CLECAT and FIATA believe that the completion of transport-related administrative procedures should also be discussed at EU level, as explained in our position on the Logistics Action Plan, since logistics service providers often have to use as many systems as administrations they deal with (or more), CLECAT and FIATA welcome any initiative aimed at standardising information exchange systems and fostering interoperability, even if this may take time. CLECAT and FIATA strongly support the rapid development of the e-Freight agenda and paperless transport not only in road transport, but from the interface between road transport and other modes also into all the different transport modes. A true intermodal cross-border system for e-Freight is important in order to keep control of goods switching between different transport modes and operators. In this respect we believe that interoperability standards should be sufficiently flexible to adapt to different existing standards and should refrain from the ambition of developing a new ultimate standard that would simply be just another one.

Concluding remarks

Innovative technologies in transport can offer a huge range of benefits for freight transport users. It is however extremely important that politicians realise this and actively contribute to the interoperable deployment of these technologies at least at continental level. One must not forget that the awareness by users, road operators and vehicle manufacturers of the benefits of innovative technologies is not enough, for instance seat belts and airbags needed legislation before being widely deployed.

The EU institutions' best option is to focus on setting the stage for an interoperable environment with a bottom-up approach as it is in EU business interest. CLECAT and FIATA therefore believe that the EU can greatly contribute to the development and deployment of innovative technologies:

- in giving financial support to research and development
- in giving financial support to seamless deployment of ITS on the trans-European Road Network
- in supporting the production of minimum standards for applications
- in raising awareness of decision makers about ITS and its advantages
- in promoting financial incentives to lower the cost for the end user, as long as these incentives do not become a subsidy for manufacturers

The CLECAT and FIATA Secretariats thank the ITF for giving us the opportunity to express our view on this important topic. We should like to inform ITF that 2009 Freight Forwarders' Conference on Dec 3rd will be mainly focussed on technology in freight movements. An invitation will be sent shortly.

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