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ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on Combined Transport

(Fortieth session, 29 September-1 October 2003,
agenda item 8 (d))

**ACTIVITIES AND DEVELOPMENTS IN COMBINED TRANSPORT
OF INTEREST TO THE WORKING PARTY**

Other organizations

Transmitted by the International Union of Railways

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Paris, 2 September 2003

Remarks of the UIC's Combined Transport Group on

The Draft Directive of the European Parliament and Council on Intermodal Loading Units – COM (2003) 155 Final of 7.4.2003

In March 2002, the European Commission invited the Combined Transport Group (CTG) to comment on its consultation paper on the above mentioned subject. The UIC, through the CTG, responded in May 2002 following a joint discussion with the intermodal operators.

In the resulting paper, the CTG welcomed the Commission's initiatives to revitalise the railways and make intermodality more attractive to users and expressed some reservations regarding the creation of a new intermodal unit (the paper is attached for ease of reference).

The Commission's proposed Directive (COM (2003) 155 FINAL), presented in April this year, was also discussed between the railways and the intermodal operators in the realm of their joint working platform INTERUNIT^{1/}, as its content seemed to be going further than what the earlier proposals may have seemed to indicate.

We would wish to comment on two aspects:

1. With regard to maintenance and periodic inspections of units, our initial paper had supported harmonisation in this field.

In the proposed Directive, the Commission introduces mandatory regular inspections for all intermodal units, in line with the principles already laid down by the Container Safety Convention (CSC). Once again, we reiterate our support for an alignment on those principles. However whereas the CSC regulations stipulate that the first inspection takes place 5 years after the unit has first been used and every 30 months after that, the Commission suggests that the periodic inspections (after the initial 5 year period) take place every 24 months.

We would wish to emphasise the economic impact of such measures, especially if, as suggested in the proposed Directive, the inspections have to be carried out by authorised bodies only, thus implying that the operators' internal experts would no longer be authorised to perform that task. It is feared that this would put an additional cost burden on rail as opposed to other modes such as road or maritime ISO container transport.

^{1/} INTERUNIT, the International Combined Road-Rail Transport Coordination Committee is an association bringing together members with de facto equal status from, on the one hand, railway companies belonging to the International Union of Railways (UIC) which provide combined transport services in Europe in cooperation with UIRR operating companies and, on the other, the UIRR operating companies themselves.

INTERUNIT fulfils its remit as a forum for strategic discussions on combined transport development by studying and coordinating activities carried out by its members in the field, and by seeking out specific ways of improving quality, productivity and the competitiveness of services delivered to the customer.

2. With regard to unit dimensions, the Commission suggests a unit height of 2670mm. This specification doesn't appear to be in keeping with the current needs of the European industry which is moving to units of 2905mm high and in some sectors higher. An internal height of 3m is often required. This is also illustrated by the fact that operators, in order to penetrate certain markets (the UK for instance) and yet retain the advantages of higher units, have invested in low platform wagons.

We hope the above comments will help the discussion.

ABOUT UIC AND THE COMBINED TRANSPORT GROUP

INTERNATIONAL UNION OF RAILWAYS – UIC

The International Union of Railways was founded officially on 20 October 1922 at an international conference in Paris. The statutes were approved by 51 railway companies from 29 countries in Europe and Asia. The purpose of the organisation was initially to deal with all technical and operating matters relating to the development of international rail transport. Subsequently, the field of cooperation expanded to include all key disciplines of importance for the future of railway companies, i.e. policy-making, strategy, commercial, management and financial aspects.

The latest revision of the statutes took place in 1993. The objective consisted of adapting international cooperation structures and decision-making mechanisms to the new challenges, particularly liberalisation of the transport market in Europe and the development of railway cooperation at world level.

In recent years, a large number of new members have joined UIC including railway companies from all the continents and new railway operators spawned in the wake of company restructuring.

Today UIC has 152 members from 87 countries on 5 continents.

Combined Transport Group - GTC

In order to develop and promote combined transport, a joint body had to be created, common to Railway Undertakings, with the task of encouraging and coordinating the work conducted in this field and centralising the results obtained.

This special group, known as the Combined Transport Group (CTG), comprises the following Railway Undertakings:

BLS, CD, CFF/SBB, CFL EuroLuxCargo, CP, DB AG, DSB – Railion Denmark, EWSI, Trenitalia spa, GySEV/ROeEE, HZ, MAV, NSB, ÖBB, PKP, RAILION Benelux, RENFE, SNCB, SNCF, SZ, ZSR.

As part of its remit, the CTG shall be responsible for fostering exchanges among its members on technical, commercial and legal subjects. The CTG shall also conduct public relations work and assume a representative role on behalf of its members.

a) The technical subjects shall include

- infrastructure, rolling stock, harmonisation of standards, standardisation, carriage of dangerous goods;
- operational matters (border crossings, etc.);
- information and data exchanges (coding, EDI);
- research and new technologies.

b) The commercial subjects shall cover

- market research and general-interest statistical surveys;
- creation of quality labels;
- cooperation with customs and taxation authorities;

c) Legal issues

In the field of combined transport and in liaison with the CER, the CTG shall contribute to the drafting of international texts and update UIC leaflets in cooperation with the various bodies of that Association.

The CTG may also investigate the form and extent of public aid granted by States.

d) Public relations

The CTG shall foster the relations that are necessary to its work with operators, shippers, railway undertakings that are not UIC or CTG members, government authorities and international organisations.
