

GETC/B2761/EGE

Brussels, 8 July 2004

ILU

The European Commission has launched a modified Proposal for intermodal loading units (ILU).

I. ANALYSIS

In the framework of developing sustainable solutions for transport, particularly addressing road infrastructure saturation, the European Commission aims to increase the competitiveness of freight intermodal transport by promoting the efficient use of intermodal loading units.

The main objective consists in developing a voluntary new type of container, the European intermodal loading unit (EILU), combining the advantages of land containers (swap bodies) - i.e. bigger - and sea containers (ISO 1 series) - i.e. stronger and stackable.

The European Commission's Proposal for a Directive, published in April 2003 (COM52003)155) was approved by the European Parliament, in January 2004, with a number of amendments. The most important amendments were the compliance with CSC standards (International Convention for Safe Containers) to avoid future inconsistencies between European and global standards and the increase in EILU height to 2'900 mm instead of 2'670mm.

In spite of these modifications being approved by the IRU, this was not sufficient to alter it's negative position.

The European Commission decided to take on board some of the EP amendments in first reading and adopted recently a modified Proposal (COM(2004)361).

The text may be downloaded at:

http://europa.eu.int/eur-lex/en/com/pdf/2004/com2004_0361en01.pdf

The main elements of the modified Proposal are listed in the attached table. Modifications compared to the initial Directive are in bold or strikethrough text.

II. IRU POSITION

The IRU supports the development of multimodal transport for capacity reasons. But :

- it has to be sustainable, following the IRU 3 "i" strategy;
- there has to be a correct price/quality ratio, and

- the choice of mode has to be market-driven.

As far as this (modified) proposal for a Directive concerns, the IRU is not convinced of any need for new regulations regarding maintenance and inspection of intermodal loading units. The approval system for containers and swap bodies appear to satisfy all parties involved. The modified Proposal for a Directive makes no reference to safety statistics nor does it address safety or damage issues.

The proposed mandatory security measures, for both ILU and EILUs, such as the use of anti-intrusion alarm systems and electronic coding and identification systems, are not only outside the scope of the CSC but also should be considered in the wider context of security in goods transport, in general.

Moreover, the European Commission's modified Proposal, even without making the European intermodal loading unit mandatory, does not reflect economic reality:

- Swap bodies are only used in road transport operations and should therefore be excluded from the field of application of the Directive; the positive impact of stackable swap bodies for inland waterway transport will certainly be limited;
- Industry should be responsible for the standardisation of loading units (CEN and ISO); this is not the role of the European Commission;
- Trans-shipment charges are a minor problem compared to all the other problems facing multimodal transport.

This Proposal for a Directive, even after amendments, provides no value-added solutions for intermodal users. The economic impact for the road transport industry will be negative. It will only result in increased costs with no improved efficiency.

III. ACTION

Members are invited to undertake the required lobbying activities by sending letters and talking to their MEPs.

The IRU and its Members have to convince MEPs, and especially new elected MEPs that this Directive proposal will not contribute to the development of multimodal transport.

ANNEX 1

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08.07.04

<p style="text-align: center;">ILU (Intermodal Loading Unit)</p>	<p style="text-align: center;">EILU (European Intermodal Loading Unit)</p>
<p style="text-align: center;">MANDATORY FOR NEW ILUs</p>	<p style="text-align: center;">VOLUNTARY USE</p>
<p><u>Safety and security:</u> Comply with the relevant provisions of the International convention for Safe Containers concluded in Geneva on 2 December 1972.</p> <p>Minimise risk of damage in and between modes of transport.</p> <p>Equip all new intermodal loading units with anti-intrusion alarm devices, i.e. state-of-the-art electronic seal.</p>	<p><i>In addition to requirements applied to all new intermodal loading units, EILUs must also conform as follows:</i></p> <p><u>Weights and dimensions:</u> Comply with the provisions of Directive 96/53/CE on weights and dimensions.</p> <p><u>Type:</u> Multi-purpose dry cargo box.</p>
<p><u>Handling:</u> Enable efficient manipulation of containers, e.g. with handling equipment adapted to ISO containers (ISO series 1) and stackable swap bodies taking into account trans-shipment efficiency.</p>	<p><u>Internal length:</u> Should allow :</p> <ul style="list-style-type: none"> • 11 units of 1200 mm, for the long version • 6 units of 1200 mm, for the short version <p>to be placed lengthways with the necessary margins for manoeuvre.</p>
<p><u>Securing:</u> Make securing devices compatible with the four modes of transport.</p>	<p><u>Internal width:</u> Should allow two euro pallets (1200 x 800 mm) or two UK-pallets (1200 x 1000 mm) to be placed lengthways (i.e. 2 x 1200 mm) or three euro pallets placed widthways (i.e. 3 x 800 mm) side by side allowing sufficient margins for manoeuvre.</p>
<p><u>Strength:</u> ILUs must not break or open if they are accidentally dropped.</p> <p>ILUs must withstand everyday knocks during handling without causing any damage which might lead to the indication of periodic inspection not being affixed.</p>	<p><u>External height:</u> 2900 mm</p> <p><u>External width:</u> Should allow safe stowage inside and on deck of existing cellular container ships in accordance with applicable ISO standards.</p>
<p><u>Coding and identification of units:</u> Use state-of-the-art electronic coding and identification.</p>	<p><u>Strength of construction:</u> The reference document for the strength values is the ISO 1496 series of standards, where applicable.</p> <ul style="list-style-type: none"> – Stackability up to four loaded long units in sea conditions. – Stackability corresponding to ISO 20' containers for loaded short units. – Sufficient racking strength for carriage in the above height of stacks by inland waterway and short sea shipping. – Top lifting capability.