



Brussels, 20 March 2014

Subject: **Revision of the Weights and Dimensions Directive**

Open letter to transport attachés

Dear Madame,
Dear Sir,

We would like to ask you to support the Commission proposal on intermodal transport in order to facilitate the use of sea transport in intermodal transport operations.

In April 2013, the Commission proposed to revise the Weights and Dimensions Directive.¹ As part of this proposal, the Commission proposes to allow trucks or combinations of trucks to be 15 cm longer when used for intermodal transport of 45-foot containers (art. 11), under the condition that the road component is not exceeding 300 km. For intermodal transport involving intra-EU short sea shipping, a longer distance (more than 300 km) for the road component is made possible.

ESPO, ECSA and FEPORT fully support the Commission proposal. This small increase in length will make it much easier to use a sea link as part of the voyage of the goods, without having to pass administrative procedures, as is the case today.

The Commission's proposal is in line with the EU's transport policy objectives of stimulating intermodal transport and more precisely encouraging the use of sea transport, including short sea shipping, being the most sustainable transport means in tonnes/km.

ESPO, ECSA and FEPORT cannot support the proposal under discussion in the EP and the Council to replace the definition of "intermodal transport" as put forward in the Commission proposal by the one of "combined transport" used in Directive 1992/106 (Combined Transport Directive).

Using the "combined transport" definition would imply that only road journeys within a radius of maximum 150 km from the port will be considered as "combined transport" and, then, will benefit from the derogation of 15 cm of maximum length for vehicles or combinations of vehicles engaged in the transport of 45-foot containers.

¹ Directive (COM(2013) 195) amending Directive 96/53/EC laying down the maximum authorised dimensions and weights for certain road vehicle

As a consequence, ESPO, ECSA and FEPORT believe that the use of the definition of “combined transport” would restrict the development of short sea shipping / sea transport. As a matter of fact, too many end-destinations are not reachable within 150 km from a port, by consequence this very restrictive definition will discourage the use of sea transport (for part of the transport) operation. In most cases this will be to the benefit of road transport, as rail alternatives are not everywhere in place.

For all these reasons, ESPO, ECSA and FEPORT support the Commission proposal that does not limit the road leg if combined with European short sea shipping. Both organisations believe that not limiting the road leg is the best guarantee for encouraging maritime transport. In view of finding a compromise, ESPO, ECSA and FEPORT are willing to accept the 300 km limit in case of deep sea transport.

ESPO, ECSA and FEPORT call upon Member States to support the Commission’s proposal and to create a framework that effectively encourages the use of maritime transport by easing the pre and after transport of 45 foot containers to and from the port.

We sincerely thank you for taking our concerns into consideration and will be happy to provide any further clarifications if you would wish to obtain so.

Sincerely yours,



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Secretary General ESPO



Patrick Verhoeven
Secretary General ECSA



Lamia Kerdjoudj-Belkaid
Secretary General FEPORT

Since 1993, ESPO represents the port authorities, port associations and port administrations of the seaports of the Member States of the European Union and Norway. ESPO has also observer members in several neighbouring countries to the EU. ESPO ensures that seaports have a clear voice in the European Union. The organisation promotes the common interests of its members throughout Europe and is also engaged in dialogue with European stakeholders in the Port and Maritime sector.

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Founded in 1993, FEPORT is the European organization which represents the interests of the terminal operators and stevedoring companies located out of the seaports of the European Union. FEPORT membership consists of large, multinational terminal operating companies and national associations from the individual European Union member states. The organization’s aim is to promote the interests of FEPORT’s members and to maintain constant dialogue with all EU institutional and non-institutional stakeholders.

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ECSA, the European Community Shipowners' Associations, comprises the national shipowners' associations of the EU and Norway. ECSA's aim is to promote the interests of European shipping so that the industry can best serve European and international trade and commerce to the benefit of shippers and consumers.

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