



The Temperature-Controlled Road Transport and Logistics Sector



A Political Manifesto for a Sustainable Temperature-Controlled Transport Agenda for Europe

Transfrigoroute International, June 2015

Foreword by Willem Zonnevijle, President of Transfrigoroute International



In 2015, shifting market dynamics, changing consumer needs, and new political leadership in Europe are driving an EU transport agenda focused on sustainability, growth and innovation in the European transport sector in the years to come.

These priorities mirror those of Transfrigoroute International (TI), the voice of the temperature-controlled transport

and logistics industry in Europe, spanning 15 countries and uniting some 1,500 members. For 60 years, TI has represented the interests of haulage companies, manufacturers of equipment and accessories, and technical testing organisations from across Europe in the policy debate at EU level.

TI's commitment to leadership in the areas of sustainability, economic growth, and innovation has never been stronger, and we wish to reiterate our value as a strategic partner for Europe. In our absence, vital cargo such as temperature-controlled pharmaceuticals and perishable foodstuffs would not reach their end destination, to the detriment of other base industries in Europe and consumers.

I am pleased to present TI's Political Manifesto, which calls on EU lawmakers to implement smart policies in 6 key policy areas that critical to the long-term health and success of the temperature-controlled transport and logistics sector in Europe.



Policy Priorities of Transfrigoroute International

1. Place road transport at the heart of the EU agenda

TI is calling on Europe's new leaders and particularly EU Commissioner for Transport Bulc to devote due attention to promoting growth- and innovation-friendly policies in the road transport sector as a matter of priority in 2015. Road transport has the highest short and medium term potential to improve the efficiency and environmental footprint of European logistics.

Our sector fully supports multi-modal transport options and our members pioneer in this area to save costs and time whenever the infrastructure allows it. However, as we are transporting food and pharmaceuticals safety is our number one priority. To ensure this safety, operations in the cold chain need to be as limited and short as possible, making the truck the essential link for any foreseeable future.

3. Better vehicles for better and safer logistics

TI welcomes the revision of Directives 96/53/EC on Weights and Dimensions as an opportunity to reduce greenhouse gas emissions from heavy-duty vehicles and enhance road safety, as laid out in the European Commission's Transport White Paper of 2011.

TI reiterates its support for the European Modular System and cross-border circulation. This is an easy win for the EU to reduce the environmental footprint of logistics.

TI also demands for exemptions to be granted to the temperature controlled vehicles on maximum height and length, with extra space to be used **only** for better air circulation and not for extra load space.

TI wishes to remind EU policymakers the critical impact of regulations governing vehicle length on their businesses. It urges them to **take into account the impact of any change in the authorised weights and dimensions of vehicles on the value of existing fleets and demands that hauliers are guaranteed reasonable transition costs.**

4. Reduce emissions, mitigate costs and noise

In the context of the revision of Directive 97/68/EC on Non-Road Mobile Machinery, TI fully supports in principle the proposed alignment of EU rules with international norms on CI engines as a common transatlantic market place for mobile refrigeration equipment. It believes this would be very beneficial from both an environmental and economic perspective, and wishes to highlight that **the key factor to be assessed in this regard is how fast and at what costs can such desirable results be achieved.**

In view of existing EU environment law and recently adopted new rules on reducing CO2 emissions, improving energy efficiencies and limiting the use fluorinated gases used in refrigerants, TI is greatly concerned that any proposed time line to introduce these new tier IV engines, which can be produced in sufficient numbers, needs to take into account commercially acceptable production and administration costs.

Therefore **it is calling for a five years' transition period** following the official publication of the revised Directive to be able to balance the technological development costs to design new environmentally friendlier engines and the production adaptation costs.

In addition, TI considers that **a minimum of five years of stability need to be guaranteed** between any further emission stages in order



to provide industry with planning security on investments.

5. A responsible use of refrigerant gases

Following the entry into force of the new F-Gas Regulations on 1 January 2015, TI wishes to reaffirm its support for the inclusion of road transport - cooling equipment on board trucks, trailers and vans - within the scope of the law and reminds that this is something it explicitly asked for in an earlier stakeholder consultation.

TI also wishes to stress the following points:

- Currently, the temperature controlled road transport industry has not yet developed a simple “drop-in” solution for f-gases. It cannot be predicted with certainty whether such a solution will be ready by 2018, when the cost of HFCs is likely to start increasing.
- Our cooling equipment typically lasts approximately 6 years (vans) and 9 to 12 years (trucks & trailers). As HFCs such as R404A is used in roughly 90-95% of units across the three main sectors in road refrigeration (vans, lorries, and trucks & trailers), this can lead to maintenance problems for our transporters.

As national implementation of the new rules begins in Europe, **TI urges the Member States to take into consideration the potential impact of the phase-out on the servicing and maintenance of refrigeration equipment in refrigerated transport, and take the necessary steps to ensure our sector’s competitiveness and growth potential remains unaffected by the new Regulations.**

TI also calls for consideration of industry efforts to explore alternative solutions to F-gas refrigerants that can guarantee the future use of existing equipment, and thereby avoid wasted investment.

6. Improve market access

In light of recent developments on minimum wages in Germany and France, TI reiterates its support for measures that support responsible operators. But these measures should not be taken unilaterally at national level with different administrative requirements as this would go against the spirit of the EU internal market and would create impossible administrative burdens for international transporters.

7. Modernisation and harmonised application of ATP rules

The fundamental regulation for international operations in our sector is the UNECE *Agreement on the International Carriage of Perishable Foodstuffs and on the Special Equipment to be Used for such Carriage*, better known as the ATP.

TI demands that the ATP is applied and enforced in all EU countries in the same way. Therefore, **TI supports the integration of ATP rules into EU law.**

8. Safe and secure parking areas

TI demands more and better coordinated efforts for the creation of safe and secure parking areas across Europe.

TI also fully supports the electrification of parking and service areas, which would empower the sector to jointly ensure a significant reduction in noise pollution, emissions and costs.

