



Transfrigoroute International

The Inter-Professional Organisation Serving Temperature-Controlled Transport and Logistics

White Paper

Towards a competitive and resource efficient temperature-controlled transport system

Executive Summary

Transfrigoroute International (TI) is the umbrella organisation of the temperature-controlled road transport. **Our sector has an important social responsibility, as it plays a vital role in ensuring the continuation of the cold chain for perishable foodstuffs by assuming the legal obligations under the General Food Laws for the public health and safety of all 500 million EU consumers.**

TI welcomes the European Commission's Transport White Paper's goal to reduce greenhouse gas emissions by at least 60% by 2050 with respect to 1990. Although a large number of points are welcomed by our members, TI would like to raise a number of points, which are of concern for our sector:

- 25% of all CO2 emissions occur in urban cycles: much of this is due to congestion, but also to inefficient urban distribution methods. The CO2 emissions caused by the distribution of perishable products in urban centres cannot be rectified by technology or taxation alone: **more effective and innovative urban planning is necessary.** Consideration should also be given to the widespread introduction of off peak time / night time distribution by vehicles which meet strict noise and emission levels, where socially and commercially acceptable.
- **The transport of perishable products may not lend itself to an easy and efficient modal shift or intermodality,** as consideration has to be given to the shelf life of the products and public health and safety, as well as to the necessity to maintain the cold chain and limit the number of manipulations likely to break it. Of course, this does not exclude the possibility of intermodality, or rather co-modality, with other transport modes where these might be appropriate and where an efficient way of maintaining the cold chain is found.
- **Investing new revenues, such as those generated from the Eurovignette, into road infrastructure is essential.** For example, there is an appalling lack of secure and fully equipped parking spaces, which are essential for refrigerated vehicles.
- **Strong social legislation is important and needs to be equally applied throughout the EU (including the levels of fines).** However, given the very nature of the goods we are transporting, **more flexibility would be extremely important from an environmental point of view,** as when the truck stops to respect the mandatory breaks, the cooling machines continue to work.



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About Transfrigoroute International & the White Paper

Founded in 1955 as a non-profit association, TI is the specialist independent umbrella association for the temperature-controlled road transport sector. TI comprises 18 national member associations in Europe and North Africa and unites some 1,500 members involved in temperature-controlled logistics and the transportation of foodstuffs by road tanker vehicles. TI is open to both haulage companies which transport foodstuffs or perishable goods using insulated vehicles, as well as manufacturers of commercial vehicles, trailers, vehicle bodies, refrigerating equipment, and accessories, as well as technical testing organizations.

The social responsibility borne by the temperature controlled transport industry by far exceeds the proportion of the total EU fleet size, estimated to be approximately 10% compared to other transport activities. **Our sector plays a vital role in ensuring the continuation of the cold chain for perishable foodstuffs by assuming the legal obligations under the General Food Laws for the public health and safety of all 500 million EU consumers.**

TI, which is a member of the International Road Transport Union (IRU), supports the majority of the IRU's comments in this regard. However, being the specialist independent umbrella association for the temperature-controlled road transport sector, TI would like to highlight certain specific elements which are of utmost importance for our sector:

1. Innovation has to be considered in the broad sense to reduce GHG emissions;
2. Multimodal combinations: not necessarily adapted to temperature-controlled transport;
3. Getting prices right, avoiding distortion and investing in infrastructures; and
4. The importance of well-designed, flexible, and strong social legislation.

1. Innovation has to be considered in the broad sense to reduce GHG emissions

TI welcomes the European Commission's publication of the Transport White Paper, the most important policy paper which has been published for our sector in recent years. **TI fully encourages the objective of reducing greenhouse gas emissions by at least 60% by 2050 with respect to 1990.** However, the pace of transformation has to stay bearable for road transport operators, who have an important social responsibility.

Members of TI are actively working on reducing GHG emissions, as **all parts of our industry are producing a growing number of effective and environmentally-friendly equipment.** Indeed, in recent years great strides have been made in truck engine technologies and other energy consuming equipment used by our members. Our organisation is constantly looking for ways to make refrigerated transport operations more efficient and greener, through better insulation materials, measurement of energy consumption, and best practice sharing on operations.

Furthermore, TI welcomes and supports a number of initiatives which are put forward in the White Paper and hopes to be able to work with the EU and national institutions in order to identify solutions which can help reduce GHG emissions while continuing to enhance the competitiveness of the European transport industry, whose importance has been acknowledged in the White Paper. TI believes that there are solutions which help achieve both goals, such as the push for more efficient urban distribution methods. 25% of all CO₂ emissions occur in urban cycles: much of this is due to congestion, but also to inefficient urban distribution methods. The CO₂ emissions caused by the



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distribution of perishable products by our members in such urban centres cannot be rectified by technology or taxation alone. **Better and innovative urban planning, such as night deliveries with silent vehicles, especially for supermarkets in large population centres, where socially and commercially acceptable, must be considered as part of the plan:** these measures would yield more immediate impact rather than focusing on the long distance perishable transport sector. This would indeed have multiple benefits from a traffic management point of view, reduction in congestion due peak hours and lowering serious or fatal accidents.

2. Multimodal combinations: not necessarily adapted to temperature-controlled transport

Nowadays, wherever we are in Europe, we are eating Spanish Serrano ham, Italian Parmesan, French cheese, Norwegian salmon, or tomatoes from the Netherlands. Our eating behaviour has become more European, with EU citizens now accustomed to having a wide variety of non-seasonal products available all year round. This has become part of our standard of living and changing this behaviour on a wide scale appears to be unrealistic.

All these perishable foodstuffs are being transported by our trucks and operators, which are ensuring that the cold chain is not broken and that this food stays safe, fresh, and tasty from origin to final destination.

The Transport White Paper foresees a larger amount of intermodal transport, especially regarding transport of more than 300 km. However, this might create major problems in the case of perishable foodstuffs, since for these goods the cold chain must not be broken if the quality and safety of a product is to be maintained. In fact, the best way to ensure the cold chain is not broken is to limit the amount of manipulations: however, **if food is first transported by a truck, then loaded onto a train, then placed on another truck to reach its final destination, the risk of breaking the cold chain effect will increase significantly.** This in turn might have a negative impact on the consumer, and even on public health at large.

In addition, it needs to be noted that intermodality might place an insurmountable burden on our member companies. According to the General Food Law (Regulation No. 178/2002) currently in place, transporters are as responsible for the quality and safety of the foodstuffs they are transporting as the producers. However, if new legislation forces transporters to adopt a behaviour which is more likely to break the cold chain, by multiplying potentially risky manipulations, they would be liable for an action they are unwilling to undertake, but which was imposed by the legislator.

This does not mean that perishable transports should be excluded *per se* from intermodality, but that intermodality should be applied if and only if there is no risk in breaking the cold chain and if the shelf life of the product is respected.

It would, therefore, make sense to **come back to the concept of co-modality** as laid out in the 2006 Commission Communication on the Mid-Term Review of the European Commission's 2001 Transport White Paper. Co-modality distinguishes itself from multimodality, insofar as it promotes the efficient use of different modes on their own *and* in combination. Hence, **forced multimodality should not be used when it comes to perishable foodstuffs.** Indeed, the current prioritisation of passenger trains at the expense of freight trains, as well as the transit times and efficiencies offered by road transport, make the latter the optimal mode for food transportation, unless dedicated trains for perishable



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foodstuffs are deployed. However, short sea crossings from southern to northern Europe may be more efficient than driving. TI would welcome the opportunity to explore such commercially viable, time efficient alternatives.

3. Getting prices right, avoiding distortion and investing in infrastructures

TI does not support an absolute internalization of external costs as is foreseen in the Transport White Paper. The EU transport sector is already facing the revised Euro-Vignette, a potential new energy tax which will drive up diesel costs across the EU, urban road tolling, and city congestion charges. Additional charging which imposes an additional burden on the sector would not help to ensure the competitiveness of the European transport industry. In this respect, TI would like to refer to the positions taken by the IRU of which TI is fully supportive: in the absence of earmarking, the new Eurovignette Directive is nothing more than an additional tax placed on the transport sector.

In addition, TI would like to make observations as regards two specific points: earmarking of revenues and the creation of a level playing field.

The Commission calls the revision of the Eurovignette Directive an important first step. Yet, the new Directive does not ensure the earmarking of revenues. **If an additional burden is being placed on our sector, revenues generated from this burden need to be reintroduced in road infrastructure**, so as to ensure that the competitiveness of our sector is being upheld. This is particularly true for the temperature controlled road transport sector.

Indeed, there is an **appalling lack of fully equipped and secure parking areas**. However, it is of vital importance that our drivers and goods stay safe in case of an overnight stay on a public resting area. Moreover, these areas need to be furnished with the appropriate electronic equipment and infrastructure so that our refrigerated vehicles can continue to work overnight in a more energy efficient way.

TI entirely supports the White Paper's long term goal to create a system in which European hauliers do not need several tags and tolling contracts to circulate on European roads. TI would like to end distortions which exist in the taxation and tolling domain between different countries, leading to unjustified advantages for certain countries. TI appreciates that taxation is a national competence, but would still like to emphasize that it welcomes and supports greater levels of harmonization throughout the EU.

At the same time, the White Paper points out that it is necessary create a level playing field between modes which are in direct competition. In this context, **TI would also like to point out that it is important to end the unjustified advantageous treatment given to rail transport** which benefits from substantial Member State government subsidies and where real infra-structural costs are poorly defined.

4. The importance of well-thought out, flexible and strong social legislation

The White Paper acknowledges the importance of quality jobs and working conditions. **At TI, all operators have to ensure that their drivers work in secure and sound conditions.**



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However, sometimes, flexibility is needed given the nature of our transported goods. If a driver can drive for one more hour and reach his destination, this is not only more preferable for him than to force him to make an 11-hour break (daily rest period) or 45-hour break (weekly rest period) at a public rest station; it is also more sustainable from an environmental point of view. Indeed, these breaks mean that – given the perishable nature of the good transported – the cooling machines need to continue to work.

Another example where flexibility is needed is road checks, during which drivers have to present record sheets or the driver card for the current day and the previous 28 days. If (s)he was absent (sick, holiday, rest) during those 29 days, (s)he has to justify this absence with an attestation of activities. TI would like to abolish this attestation. Road transport is the only industry where one has to give account of the drivers' absences during controls, which poses a significant administrative burden for transport companies.

Unfortunately, not all operators respect high social standards – particularly where self-employed drivers are concerned. TI therefore calls on the Commission and Member States to take measures to effectively enforce existing legislation in a way that ensures that the drivers and companies that do not respect existing legislation, thereby putting lives of drivers at risk and creating disloyal competition, are caught and fined effectively.

In this context, it should be noted that there are significant distortions in fines across Europe: exceeding the daily driving time in Spain can lead to a fine of €4600, while in Greece the maximum fine is €400. Tampering with the tachograph costs the perpetrator €586 in Lithuania, €2460 in Poland, €4601 in Spain, €6232 in Italy and €30,000 in France. Although TI recognizes that this is a national competence, we hope that the European Union will push for more harmonization, thereby bringing about better enforcement of existing legislation and more predictability for operators and drivers.