Intermodal loading units

ENCOURAGE INTEROPERABILITY INSTEAD OF FORCING IT!

The draft Directive

When the EU Commission published its consultation paper in March 2002 and its first proposal COM (2003)155 for a Directive on intermodal loading units in April 2003, the International Union of combined Road-Rail transport companies (UIRR) supported it with guarded criticism.

It appeared logical and conducive to security to subject all loading units in the future to regular inspections. However, the UIRR advocated no more frequent or stricter controls than those provided for in the Container Safety Convention (CSC) which is applicable on a worldwide basis. The European Parliament endorsed this view.

Swap body (from below cranable)

The second part of the Directive provided for standardising a „eurocontainer“, in practice a container with the dimensions of the commonly used swap bodies. The CEN, in which the industry and EU Member States are represented, was in any event just about to standardise such containers. However, the UIRR has no illusions about the effect of such standardisation and already wrote in its opinion on the consultation paper: It would certainly be a tempting solution to achieve greater interoperability with only a few different loading units. The road taken of reaching standardisation for stackable swap bodies could lead to a reduction of container diversity in the area of the so-called ‘inland containers’. Nevertheless, the UIRR companies believe that in practice intermodality will thereby make only slight progress. The market is free to accept or not to accept standards. Past experience allows the conclusion that stackable swap bodies will probably gain acceptance in only a small market segment.

Force intermodality?

However, this is something which nobody previously expected: the EU Commission now appears to wish to force harmonisation! Already in Annex I of its proposal for a Directive of April 2003 there is a demand in respect for all intermodal loading units: „Enable efficient manipulation, inter alia by means of handling equipment adapted to ISO containers“. Strictly construed, this could have been interpreted as a demand for top-lift which ultimately would have meant a prohibition on the construction of swap bodies. The UIRR pointed out to the Commission that swap bodies are the most commonly used and economically the most effective intermodal loading units and that all standardised swap bodies can be efficiently trans-shipped as they have handling devices for crane manipulation. The EU Commission conveyed its understanding and the European Parliament proposed an amendment to the text which would have excluded such a misinterpretation.

In its second proposal for a Directive COM (2004)361 the EU Commission has reversed these amendments in Annex I! The EP proposal was: „Enable efficient manipulation of containers (ISO Series 1) and stackable and non-stackable swap bodies, taking into account trans-shipment efficiency.“

Semi-trailer (from below cranable)

The EU Commission now omits the underlined words and adds above to the requirements for **all** loading units: „ … and take into due account the existing relevant ISO standards“.

Container (from above cranable)

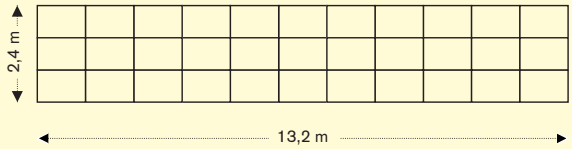
Can this again be an error or carelessness or is it a clear sign that the EU Commission is on the way to wishing to force interoperability by requiring sooner or later top-lift for all loading units, which could only mean prohibition of the use of swap bodies?

Ideal in theory – in practice a flop?

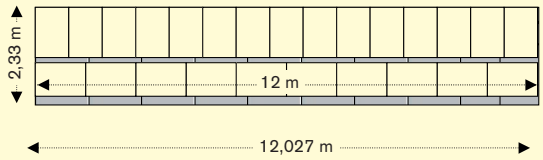
The original proposal for a Directive COM(2003) 155 was published as part of the programme to promote short sea shipping and, as is clear from the above comments, inland waterway transport and short-sea shipping would in the first instance have profited from the stackability of the loading units. While the eurocontainer with the measurements of a swap body will not fit into ship cells constructed for ISO containers with smaller external measurements, it can usually be taken on deck. Should the new eurocontainer prove successful and result in greater traffic on inland waterway and short sea shipping, their owners would certainly react with new orders and change ship cells so that these new markets could be served. Unfortunately the relevant shipping associations have not looked on this in that way and have first demanded that the new container should fit into existing ship cells. The European Parliament followed this argument and the Commission has written the following into the revised version of Directive COM(2004) 361: the external width must „allow safe stowage inside and on deck of existing cellular container ships in accordance with applicable ISO standards“.

Use of the capacities for long EILU

Swap body & new eurocontainer
33 europalettes



40-foot ISO container
25 europalettes

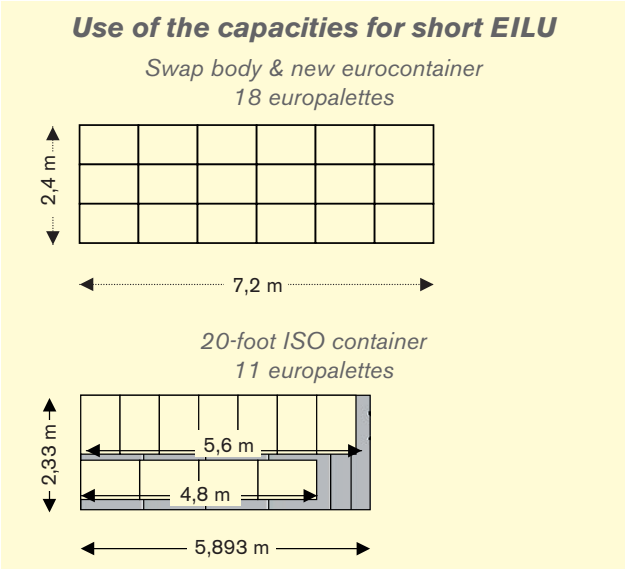


Finally, the manufacturers have assured that there is no problem about being able to construct containers with correspondingly thinner walls which suit to the width of palettes inside and are compatible with ship cells outside. In practice, however, this would increase the cost of the eurocontainer to an unrealistic extent.

The dream of the universal loading unit, an „egg-laying full-cream milk sow“, cannot be realised in practice, and an attempt should not be made to impose it on the market. It would be more realistic to reflect on the original approach, namely, to finish standardisation of stackable swap bodies which is in progress with the CEN, in the certain knowledge that intermodality will be strengthened thereby only in a submarket.

Biased leaflet of the DG TREN

In parallel with this, the Directorate-General for Energy and Transport has published a leaflet which gives a distorted account of reality in order to convey a negative view of swap bodies and praise the advantages of the new European intermodal loading unit.



As regards swap bodies, the German version erroneously states: „ … they are usually neither stackable nor suitable for sea transport and cannot be lifted by cranes.“ (In the English version it is stated: „nor can they … be top-lifted by cranes“). While the latter is not so erroneous, it nevertheless also suggests great disadvantages, especially as the advantages such as a lesser dead load and lower investment costs are not mentioned.

A study by ICF Consulting on the economic value of the Commission proposal is then cited: „Depending on the commodity, the corridor, and the prior transport operation, transport costs can be reduced by as much as 10%.“ The study has „between zero and 10 percent.“ At the European Parliament hearing on 26.11.03 the UIRR had already, in the presence of the EU Commission, referred to the one-sidedness of the study which writes about the effects of the introduction of the new European loading unit without mentioning why such loading units, which have existed for a long time, have not yet been accepted by the market. Or was this not known to the authors? The UIRR pointed out that this was an opinion which describes the advantages of this loading unit mainly from the standpoint of short sea shipping and inland navigation. And in fact, if the new pallet-wide eurocontainer is compared with traditional ISO containers, there are productivity increases due to the larger volume. These are, however, purely theoretical, as in practice pure road vehicles or swap bodies have gained acceptance in continental transport precisely because they have for a long time achieved this increased volume and additionally – which is completely overlooked – weigh less and are more universal: they can be loaded from all sides and, unlike the container, put down or trans-shipped between road vehicles without any crane, only by means of air suspension. On the basis of its stronger construction ensuring top-lift and stackability, a container weighs more than a swap body (which consequently can transport a greater payload) and which is already at a disadvantage as compared with a road vehicle with fixed superstructures which can transport a payload of two to three tons more per road train.

Lateral loading of a swap body

Also the argument of greater productivity in trans-shipment if only containers were handled by crane will not wash. Anybody who reads the study carefully will in any event also find a reference to the fact that trans-shipment of containers by top-lift alone would still not help to economise on the grapple arms of trans-shipment cranes as long as semi-trailers were still being accepted at the terminal! Why is the semi-trailer – actually the most universal intermodal loading unit for road, RoRo ships and CT trains – often forgotten in transport policy? In legal terms, it is considered to be a road vehicle!

And whoever is still not convinced after the first two pages of the leaflet, should be frightened on the third

page: „International transport is a major target for terrorists, smugglers, thieves and stowaways." Hence „new ILUs should be fitted with the best available anti-intrusion alarm devices (for example, a state-of-the-art electronic seal) …".

Swap body on feet

It is admittedly known that the attacks of 11 September 2001 were carried out with hijacked aircrafts. Attacks with the aid of intermodal loading units have however not previously taken place. Thefts i.a. exist everywhere. Finally, the security argument is also misused for the purpose of suggesting advantages for the new eurocontainer as compared with swap bodies.

The UIRR will give its views on security in combined transport in a separate paper. However the following can be divulged: the container does not in this respect automatically have only advantages over swap bodies and it must not always be state-of-the-art technology where proven measures are sufficient to increase security. Where a padlock or mechanical lead seal is sufficient, use of the Galileo satellite system must not be sought!

Combined transport in free competition

Any attempt to force interoperability will only harm combined transport. What is the use to us of interoperability with a universal container which can theoretically travel on all modes and be trans-shipped by all cranes if it is not accepted in practice and traffic is shifted back again to the road? As it is, most swap bodies travel only on the road and rail modes and therefore do not have to be stackable. And what is known by few: a large proportion is used only in road transport, with these loading units being trans-shipped between short- and long-distance vehicles or being simply put down at the shipper's or recipient's ramp and collected later!

It should not be forgotten that the basis of our economy is free competition. Road transport offers great flexibility and is in a position to adapt to a large extent to the wishes of shippers, diversity of products and possible loading and unloading conditions. Rail and inland waterway modes require more technical restrictions. **The basic philosophy of the UIRR companies is that as far as possible everything that can be transported by road should also be transportable by combined transport.** As the result of investment in multi-purpose wagons, most loading units of varying length dimensions and volumes developed by logistics firms can now be transported in combined road-rail transport.

Swap body at the loading ramp

Any initiative aimed at standardisation should not result in a restriction of this relative flexibility of combined transport. Restrictions would only make intermodal transport less attractive while road transport would continue to be free, within specific maximum vehicle dimensions, to optimise load lengths, volumes and payloads.

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