September 2004

UIRR proposals aimed at increasing security in combined transport

International Union of combined
Road-Rail transport companies

UIRR proposals aimed at increasing security
In combined transport

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Annex *The UIRR*

Foreword

The attacks of 11 September 2001 in New York have triggered increased security measures throughout the world. The tragic events of 11 March 2004 in Madrid have once again confirmed that Europe can also be affected and that we could have to do with a long-term phenomenon which requires appropriate answers.

The measures taken at European level are diverse and range from the introduction of a European arrest warrant through a black list of persons and organisations whose goods and bank deposits are frozen to the establishment of Eurojust (with headquarters at The Hague) for European coordination in the fight against terrorism. Police cooperation has been stepped up within the framework of Europol. Many kinds of agreements with the USA and other third countries have been concluded regarding the arrest and extradition of persons, the exchange of personal data (lists of flight passengers including information concerning persons who have committed a criminal offence or suspicious persons) and standards have drawn up for the introduction of forgery-proof passports with biometric characteristics.

In addition to these measures affecting persons and organisations, specific security measures have been taken or are in preparation in several sectors, including the field of transport. In the DG TREN, a new "Security" Directorate was set up with a division which is specially responsible for dangerous goods and intermodal security.

There are already Directives on security in air and maritime transport and a draft Directive on security in intermodal transport is being prepared.

It certainly is important, as the Commission itself stresses in many places, to react with a sense of proportion. The aim of the terrorist attacks of 11 September was to hit the Western economy at its heart. Even if the scale of human victims and material damage was considerable for an attack, this could not directly cause serious problems to the world economy. We must, however, take care that the military and civil measures taken to increase security initially on an ad hoc basis and now also on a long-term basis in all significant sectors do not assume proportions which show effects that terrorist attacks never could have had: namely to burden the world economy with costs and administrative barriers which could lead to a recession.

The International Union of combined Road-Rail transport companies (UIRR) considers that it is important to participate further actively in the drawing up of security measures for intermodal transport in order to ensure that such measures are effective and practicable. The goal of the "UIRR proposals aimed at increasing security in combined transport" is to participate in the analysis of dangers and to propose measures which will increase the level of security without basically endangering the economic efficiency of combined transport.

Competition issues

The issue of competition arises in principle in a different way as compared with maritime and air transport. In the case of world trade, there is usually no alternative as most goods arrive by ship at an EU port while in the case of other high-value goods there is no realistic alternative to air transport. Insofar as the same security measures are introduced for all European ports and airports, additional costs do not result in a competition problem.

The situation is different with inland transport operations. Combined transport is engaged in strong competition with road transport. All security measures which relate to costs and only concern the terminal or rail areas could result in a shift back to the road. It should therefore be particularly ensured that no varyingly high security requirements are made of the road and rail modes.

Distribution of responsibilities of the participants

In practice, security can be increased only if each actor in the transport chain takes its responsibilities seriously and if there is close cooperation with the security forces, police, fire brigade and authorities. A transport chain is only as strong as its weakest link. Security efforts must be increased as a priority in areas where the greatest danger lies. The UIRR companies will contribute their share to analysing and pinpointing the dangers involved.

In this connection it is right to analyse the various threats separately:

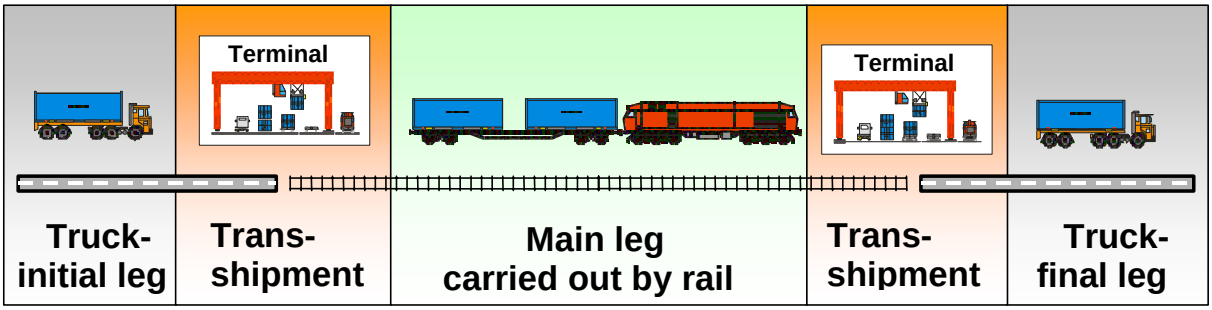
- Work security
- Transport security
- Loading security
- Security against criminal acts
- Security in relation to terrorist threats.

As regards implementation, the UIRR wishes to warn against - as is frequently the case - considering security measures against terrorist acts in isolation from those aimed at reducing other dangers. Even if we considerably increase our social budget for measures aimed at increasing security, it will always be limited. The central theme should quite generally be minimising personal injury and property damage. The costs and benefits of all security measures must therefore be assessed in relation to one other and the resources correspondingly used.

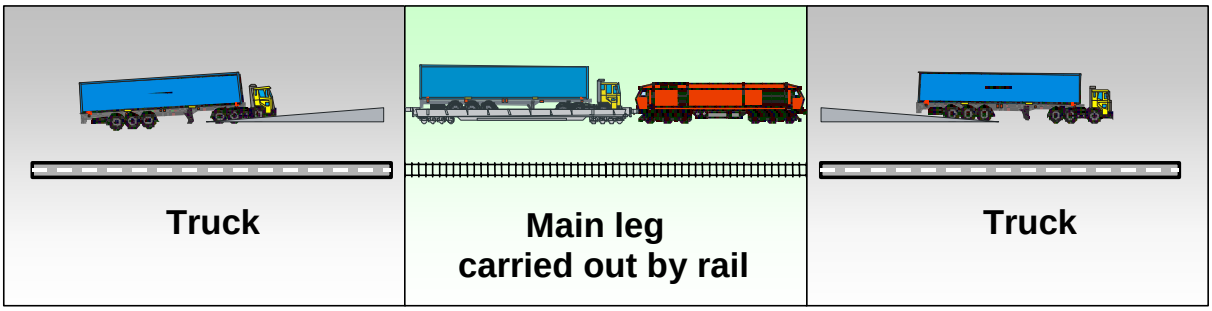
The CT transport chain

The CT operators organise combined road-rail transport which is the focus of the following comments.

Here a distinction has to be drawn basically between unaccompanied transport in which swap bodies, semi-trailers and containers are carried by rail:



and accompanied transport, or rolling road/motorway, in which the truck driver accompanies the rail transport in a couchette car:



The following usually participate as actors: The industry or shippers: freight forwarders or logistics firms, CT operators, terminal operators and railway companies as well as railway infrastructure operators. In some cases, several functions can be performed by a partner.

The focus of this paper is on the activities of CT operators and trans-shipment at the terminal and also on a number of comments on the main leg carried out by rail. The analysis of the dangers and measures relating to the initial and final legs carried out by road does not differ from that relating to general road freight transport.

Principles

Efforts at increasing security in combined transport should focus on two areas:

- Damage avoidance: raising the threshold for willful disturbances or those caused by error.
- Damage limitation: increased flexibility, giving preference to decentralised solutions, having backup approaches.

Customer relations

It is generally assumed that relations with known partners hold a lesser risk while in the case of changing partners or customers an increased risk and therefore an increased need for checking has to be assumed.
In combined transport two basic business areas are to be distinguished:

Unaccompanied transport

CT operators work in unaccompanied transport to a large extent with known partners in a long-term business relationship. This is all the more usual because they must fulfill special technical and organisational requirements in order to participate in CT. Logistics firms have to invest in intermodal loading units: swap bodies, semi-trailers or containers. Due to the limited clearance gauges of railway tracks (tunnels, bridges, railway station canopies), these have to be specially codified (measured and marked) so that the railwaymen can determine on what routes and on which wagons these may be carried. For economic reasons, combined transport assumes in most cases paired transport operations which call for efficient organisation of the initial and final legs carried out by road. This is organised either by the customer or the CT operator himself.
There is an increased need for checking only if varying "unknown" truckers are used.

Accompanied transport

In accompanied transport it is possible to go onto rail in combined transport without special organisational expenditure and without technical requirements. This is also the only area in which there are some people who pay in cash, while most firms are, however, regular and known customers. An increased need for checking can admittedly be accepted in the case of these unknown customers. Generally speaking, however, the potential security problem can be put in perspective as, in the case of the rolling road/motorway, the truck driver accompanies his road train in the couchette car. He himself carries out checking functions and his personal security is linked to that of the load.

Terminal

What dangers

The following can be named as potential terrorist or criminal dangers as regards the terminal:

- Addition or withdrawal of vehicles and loading units
- Manipulations and addition or theft of parts of the load from containers or vehicles

Efficient access checks for vehicles, loading units and persons are advisable to avoid these occurrences.

Access checks for vehicles and loading units

Access by road

Efficient checks should be conducted at the road entrances and exits of the terminal. In the case of larger terminals, check-in gates are usual. Security installations should be available which make more difficult the bypassing of the access roads by road vehicles or make this impossible. (Fences, ditches, unpaved or non practicable land, suitable illumination, alarm systems, video monitoring etc.).

Where the installation of entrance and exit gates cannot be carried out in the medium-term it is recommended that the access roads be additionally blocked with parked vehicles or loading units outside the opening hours.

Identification of vehicles

Vehicles and loading units must be clearly identified at the access road, while the driver's name and motor vehicle registration number are documented. It is recommended that as a rule only pre-booked consignments from known customers be accepted and that the driver present a booking or reference number which must tally with that of the CT operator. If this conformity exists, the vehicle may enter the terminal area to deliver a loading unit. Otherwise special checks will be required to establish legitimacy. For collections, complete exit checks are carried out which ensure conformity of the requested loading unit with the actual one to be handed over.

Identification of loading units

All intermodal loading units should have a clear identification number. For ISO containers this is usually the worldwide common BIC number and for swap bodies and cranable semi-trailers the codification number; the latter also has the motor vehicle registration number.

As a medium-term measure it is proposed that, if loading units are rejected, an information/warning system should be established. If there are doubts about the transport security of loading units, the customer will be informed and the loading units will be banned for rail transport until the shortcomings are remedied.

If the load is made insufficiently secure for rail transport, the customer will be informed and must take measures to ensure load security. On the road, this usually also means a danger. If acceptance of the loading unit is refused, there should be an examination as to how far terminals or CT operators in the same region could be informed in order to avoid delivery to a neighboring terminal.

Loading units which are not clearly identifiable and not pre-booked by the shipper or otherwise confirmed should not be let into the terminal area.

Rail access

The railside addition or withdrawal of loading units calls for special knowledge of rail transport and usually collaboration between rail transport companies and infrastructure operators. Manipulations are extremely improbable although precautions should be taken so that all wagon and loading units arriving at and departing from a terminal are recorded and registered. Alignment with previously notified data permits efficient checking.

Access checks for persons

All persons who enter, leave or drive at a terminal should be subject to suitable checking. This concerns:

- The staff of the terminal operator, the agencies of the CT operators and railway employees.
- Truck drivers who bring or collect loading units.
- Other service providers.
- As far as possible, precautions should be taken to ensure that nobody will be able to approach the installations, vehicles or loading units without being checked.

As, because of their size, location and goods handled (depending on whether or not dangerous goods are involved) terminals have completely different initial situations, a security plan should describe the measures to be taken.

Prohibited areas could possibly be set up in which especially dangerous units are stored and for which there are special access checks. By means of training courses, terminal workers could be sensitised to all security concerns including paying attention to unauthorised persons on the grounds.

Transport information

Various actors collaborate in the combined transport chain. The contractual relationships should also clearly regulate the areas of responsibility of the actors as regards security and the checking of security measures.

Documentation

The transition in responsibility and liability as well as the checks carried out should be recorded in documents. Where possible the exchange of information should be carried out electronically. The actors must harmonise their exchange formats.

Tracking and Tracing

The status of loading units in vehicles is documented in combined transport continuously with the aid of EDP systems from the time of booking up to collection after the end of transport. In addition, the customers of many operators have at their disposal password-protected Internet platforms which enable them to obtain complete information. This status information documents every transition from one participant to the next one. On the other hand, CT operators have at their disposal information systems of the railways which are based on the manual and automatic in-transit reports of the railway undertakings. In order to avoid producing an unnecessary flood of data, the actors usually prefer to generate information only in areas where relevant deviations from desired values occur.

Modern technologies - GPS

The use of modern technologies is not in itself of value. In practice, the KIS (keep it simple) principle has proved itself. Simple and cheap solutions should be used where these are sufficient. It goes without saying that it is the task of each firm management to keep informed about new developments and technologies. So far, ongoing GPS checking of all vehicles or loading units has proved to be unnecessary. Particularly in combined transport by rail, it is in most cases sufficient to know the location of the trains and their composition. Locomotive drivers and works managers of rail infrastructure are in communication with one another so that even without GPS there is usually sufficient surveillance. On the other hand, particular transport operations such as temperature-controlled loading units sometimes require the monitoring of special parameters.

Particularly customers (freight forwarders and logistics firms) do not want a flood of data and would only like to be informed of irregularities . In the same way, constant information by the authorities is not likely to result in increased security. However, on the basis of cooperation with security authorities, interfaces can be defined as in specific cases, e.g. in the case of an accident or justified suspicion relating to a specific loading unit, the necessary information concerning location and insofar as it available (e.g. in the case of the transport of dangerous goods) information concerning the goods carried can be provided quickly.

Security plans - Security officer

Drawing up security plans for specific areas, e.g. terminals, is required for security. The security measures taken, training courses for and also exercises by workers should be monitored by security officers. For the carriage of dangerous goods, the RID and ADR provisions apply and, in any event, these provide for such measures and define them in greater detail.

Special aspects of dangerous goods

The carriage of dangerous goods takes place in normal traffic in road transport in the same way as in combined transport. There are a number of reasons why this should be so, as the massing of dangerous goods in special trains or terminals is not conducive to security. On the whole it is to be assumed that, due to better monitoring, the carriage of dangerous goods by rail is much safer than by road.

In practice regional authorities often show a tendency to demand more and more precautions for trans-shipment terminals in order to increase their security while there is satisfaction with far fewer measures in decentralised road transport. Here a warning must be issued against distortion of competition at the expense of overall security, as a shift back to the road has to be feared and this would be counterproductive from the standpoint of transport security.
If even more security measures are required of the rail mode, the corresponding resources will have to be made available by the public.

Loading units

Locking loading units or providing them with devices which indicate unauthorised opening can contribute to increasing security. In the case of containers, swap bodies and semi-trailers there are devices and lead seals which so far have been used especially for customs purposes (TIR seal).

Such aids can be advantageous in cases where loading units are stored or parked for some time. They are not necessary in cases where there is a continuous traffic flow.
The various containers have completely different fields of use. On their journey, ISO containers have much longer interim storage times and must therefore be made more secure against unauthorised opening than swap bodies which are used in continental rail-road combined transport and which in most cases are trans-shipped directly from truck to wagon without interim storage. In any event, a warning must be issued against using security reasons as an opportunity for giving preference to specific loading units.

Solid containers are easier to lock and more difficult to open than swap bodies or semi-trailers with a tarpaulin and hoop. However, for transport security it also has to be borne in mind that damage due to inadequate loading security in road transport and combined transport is a constant problem. More frequent checks which increase transport security are required which, however, call for easy opening of the loading units.
There are no indications that specific loading units (swap bodies, containers or semi-trailers) offer different security risks.

Requirements of the various partners

Railway companies: main journey by rail

Achieving interoperability

The experience of the UIRR companies with illegal immigrants into Great Britain has shown that during rail transport manipulations of loading units can above all be carried out (in this case intrusion of persons) wherever trains regularly stop: at borders where locomotives have to be changed etc. The best measure in the medium-term for preventing such manipulations is to have the traffic move more smoothly, especially by encouraging interoperability. Reducing the number of different signal and current systems in Europe and the use of multiple current or diesel locomotives can result in clear improvements here.

In this way the points at which trains, wagons and loading units stand can be reduced to a few, ideally to the departure and reception terminal where, as it is, special security measures are taken.

Increase flexibility

Rail transport is more complicated and much more regulated than road transport. Certain dangers are therefore to be assessed as lower e.g. the opportunities for hijacking a locomotive or train. On the other hand, rail-borne means of transport are less flexible in the event of disturbances. This has already been shown repeatedly in the case of natural phenomena. Landslides at the Gotthard Pass two years ago blocked traffic for days and led to problems for months in Alpine transit. Generally speaking, there should therefore be greater reliance on flexibility. Before lines are closed down or points dismantled, there should be a careful examination to ensure that susceptibility to disturbance is not thereby increased.

The same applies generally to all structural, technical and operational measures in which the question of the costs and benefits of "centralisation or decentralisation" could in future perhaps be assessed differently than previously by taking greater account of security aspects. Wherever reliance continues to be placed on centralised solutions, increased precautions will be necessary as regards backup solutions in the event of a disturbance.

Freight forwarders/logistics companies: initial and final leg by road

All loading units in combined transport travel at least part of the journey by road, where they are subject to the same dangers; so the same security requirements should be demand of them as for all other road consignments. Due to the handing over to rail transport, these consign-ments are usually subject to additional checks and documentation at the interfaces with other modes.

Shippers

Shippers have a special responsibility for loading and correct declarations. All other actors in the transport chain have to put their trust in their professional activity and careful declarations and have only limited possibilities as regards checking the contents of the closed loading units. These would once again be drastically reduced by the use of high-security seals.

Authorities

Governments and authorities responsible for security must, however, also play their part in supporting partners in the transport chain with their security efforts.

In combined transport, the UIRR and its member companies felt themselves left in the lurch when primarily Great Britain and France but also the EU and its other Member States resolved their differences of views regarding immigration policy two years ago at the expense of combined transport.

This led to a serious distortion of competition between the modes and CT through the Channel Tunnel finally almost came to a complete standstill. Like other operators, the British UIRR member had to file for bankruptcy, while other operators suffered severe financial losses. Combined transport from and to Great Britain has so far not recovered from this.

Particularly as regards the issue of security there has to be a public-private partnership in which the responsibility of each actor as well as the interfaces are defined so that the challenge of "optimal security" can be jointly faced.

Annex

The UIRR

Founded in 1970 and based in Brussels, the UIRR is an umbrella organisation of combined transport companies.

It currently represents combined transport operators from 19 European countries; these operators in turn represent the many thousands of haulage companies which hold shares in them. Most of the UIRR's member companies were founded by road hauliers and forwarding agents. As private companies, they obviously have to pursue the objective of making a profit, but they are also distinctive in reinvesting these profits in improving services and prices and in new, higher-performance equipment, enabling them to offer their customers the most economical combined transport product possible.

The following combined transport operators are members of the UIRR (as of September 2004)

Active members

ADRIA KOMBI	Slovenia	KOMBI DAN	Denmark
ALPE ADRIA	Italy	HUPAC SA	Switzerland
BOHEMIAKOMBI	Czech Republic	HUPAC NV	Netherlands
CEMAT	Italy	KOMBIVERKEHR	Germany
CNC	France	NOVATRANS	France
COMBIBERIA	Spain	ÖKOMBI	Austria
CONLINER	The Netherlands	RALPIN	Switzerland
CROKOMBI	Croatia	ROCOMBI	Romania
HUNGAROKOMBI	Hungary	TRW	Belgium

Associated members

EUROTUNNEL	France

UIRR scrl
31 rue Montoyer bte 11 B – 1000 Bruxelles
Tel.: (+32) 02/548 78 90 Fax: (+32) 02/512 63 93
E-Mail: headoffice.brussels@uirr.com
Internet: www.uirr.com