



**EUROPEAN SEA PORTS ORGANISATION** ASBL / VZW  
**ORGANISATION DES PORTS MARITIMES EUROPEENS** ASBL / VZW

## **Position of the European Sea Ports Organisation on the proposed revision of the Weights and Dimensions Directive**

In April 2013, the Commission published a proposal for a Directive (COM(2013) 195) amending Directive 96/53/EC **laying down the maximum authorised dimensions and weights for certain road vehicles**.

### **ESPO fully supports the facilitation of intermodal transport by allowing a derogation of 15 cm in the length of trucks carrying 45-foot containers**

The Commission proposes the derogation of 15 cm in the maximum length for vehicles or combinations of vehicles engaged in the intermodal transport of 45-foot containers. ESPO fully supports it since this will bring clear benefits to short sea shipping and maritime transport in general.

### **ESPO pleads for an approach that encourages intermodal transport to the maximum**

In that respect, ESPO does not support the Commission's requirement that goods are loaded/unloaded at the **"nearest appropriate seaport"**. This concept should be avoided as it is vague and very impractical since several appropriate ports may be in relatively close proximity. The suitability of a seaport depends on multiple elements which can only be assessed on a case-by-case basis. Furthermore, **ESPO is against any limitation in the road leg of the intermodal transport operation when short sea shipping is involved**.

#### **⇒ ESPO strongly supports amendment 274 and alternatively amendments 276 and 278**

For these reasons, **ESPO strongly supports amendment 274** that recognises the importance of short sea shipping in the intermodal logistic chain and avoids vague references to the "nearest appropriate seaport". **ESPO alternatively supports amendments 276 and 278** that would introduce a broad definition of intermodal transport.

#### **⇒ ESPO cannot support the rapporteur's position in his draft report and amendments 102, 135, 136 and 273**

Rapporteur Jörg Leichtfried's draft report proposes to replace the definition of "intermodal transport" with the one of "combined transport" used in Directive 1992/106 (Combined Transport

Directive). According to this definition, “combined transport” means the transport of goods using the road on the initial or final leg of the journey and, on the other leg, rail or inland waterway or maritime services where this section exceeds 100 km. Moreover, the road component does not have to exceed 150 km at each end for operations involving an inland waterway port or seaport. This new definition would imply that only short transport 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.

ESPO believes that the use of the definition of “combined transport” is not the right way to go since it would restrict the flow of some container traffic. The draft report does not make any differentiation for short sea shipping in contrast with the Commission’s proposal. **Therefore ESPO cannot support amendments 15, 36 and 37 of the draft report of Mr. Leichtfried.** EU’s transport policy objectives should encourage the use of sea transport, including short sea shipping, being the most sustainable transport mode in tonnes/km.

For the same reasons, **ESPO cannot support amendments 102, 135, 136 and 273.** These amendments introduce strict limits to the length of the road leg and would have detrimental effects on intermodal transport operations.

*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.*

*For more information contact Isabelle Ryckbost, ESPO Secretary General at Treurenberg 6 – 1000 – Brussel / Bruxelles tel: +32 2 736 34 63 email: [isabelle.ryckbost@espo.be](mailto:isabelle.ryckbost@espo.be)*