

EUROPEAN ECONOMIC AREA
STANDING COMMITTEE
OF THE EFTA STATES

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SUBCOMMITTEE II ON THE FREE MOVEMENT OF CAPITAL AND SERVICES

EEA EFTA COMMENTS ON THE PROPOSAL FOR A DIRECTIVE ON INTERMODAL LOADING UNITS (COM(2003) 155 final)

I EXECUTIVE SUMMARY

The EEA EFTA Member States welcome the Commission's initiative to promote and enhance intermodal transport and to shift towards more environmentally friendly modes within the Community.

However, as the proposed new standards will necessitate the rebuilding of existing ships, it is the opinion of the EEA EFTA Member States that a thorough impact assessment is needed, since rebuilding costs are likely to be significant.

Furthermore, taking into account the very global nature of both shipping and trade, the EEA EFTA Member States suggest that efforts for developing new container standards should be taken at the international rather than regional level.

II COMMENTS

1. The EEA EFTA Member States welcome the Commission's Communication on the programme for the promotion of Short Sea Shipping and the proposal for a directive on Intermodal Loading Units. The White Paper on European Transport Policy for 2010 sets a number of ambitious targets to ensure competitiveness and sustainability of mobility also in 2010. Short Sea Shipping is an obvious choice to play a key role in reaching these targets. The EEA EFTA States take part in these concerted efforts and have appointed Short Sea Shipping Focal Points with the specific responsibility of promoting and developing Short Sea Shipping.
2. The proposed EILU standard is different from today's international standard in which container ships have been designed and constructed accordingly. In accordance with the existing standards the clearance between the hull structure and the containers and also between the containers is kept to a minimum. Container ships have cell-guide systems where the containers are stowed upon each other. Introducing a new container standard would imply that the cell-guide system in the container ships would have to be rebuilt.

3. Furthermore, the structural strength of the vessel, which is an essential safety element for all ships, is adapted to the cell-guide system. Consequently, rebuilding the cell-guide system necessitates the rebuilding of the structural strength of the ship in part or in full.
4. Thus the EEA EFTA Member States suggest that an impact assessment of the rebuilding of container ships be made in order to have the full picture of the effects of such a proposal before it is implemented. Rebuilding costs are likely to be significant.
5. Taking into account the very global nature of both shipping and trade, the EEA EFTA Member States suggest that efforts for developing new container standards should be taken at the international rather than regional level.
6. Finally the EEA EFTA States hope that their considerations can contribute to a constructive discussion on this important issue.

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