



## **FEDEMAC - POSITION PAPER**

### **URBAN MOBILITY**

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#### **Introduction**

FEDEMAC - The Federation of European Movers Associations - indirectly represents around 4000 professional Removal & Storage Companies via its National Association and Direct Affiliate Members in 25 European countries.

The very nature of the 'Removals Industry' means that trade members are operating vans and lorries in, out and via urban cities throughout Europe on a daily basis.

Whilst accepting that 'Urban Mobility', in general, involves optimising the use of various modes of transport and organising 'co-mobility' between the different modes (particularly, in connection with passenger transport), it has to be accepted that some 'niche' industries – such as 'Removal/Relocation' companies, need to use purpose-built vehicles for a specific use and the operational requirements of these vehicles (origin/destination, size/type, times {family considerations/business hours & obligations}, 'legal parameters' {obtaining 'keys'/mortgage transactions etc} are both customer-led and also affected by other 'social' matters - mostly beyond the control of the operator.

Notwithstanding these important considerations, we understand that to be effective urban mobility policies, in general, need to be based on an approach which is as integrated as possible, combining the most appropriate responses to each individual problem, such as: technical innovation, the development of clean, safe & intelligent transport systems, infrastructure improvements, economic incentives and amendments to legislation.

Above all, these matters must take account of the 'specificities' of particular operations and/or 'niche' industries within the transport sector with any change/progress being introduced at a sustainable pace – particularly in business operations where a number of SME's are involved.

We are already witnessing the introduction of schemes and innovations at local and regional levels within the different national Member States.

Whilst some of these schemes may be effective or promising for the future we are extremely concerned about the development of uncoordinated schemes which differ from country to country and even between towns and cities within countries. Such a 'patchwork-quilt' creation is extremely alarming, worrying and confusing for the transport industry (& others) and liable to bring 'innocent' carriers/operators into unintentional conflict with authorities & such schemes into distrust and disrepute.

We strongly believe that the question over 'development of harmonised rules' for such zones needs to be addressed by the European Parliamentary and Commission Authorities as a matter of urgency & before the situation becomes too anarchical and completely nonsensical. Furthermore- central, easy access and easily understandable information must be established and constantly updated/maintained, via the public 'electronic highway' system in all the main 'recognised' European languages.

The Authorities must not 'jump to the conclusion' that all schemes recently introduced are good schemes! Independent reports must be made and the results carefully analysed to determine whether such schemes are suitable or 'fit for the purpose'; or just other ways of raising funds for local authorities/national governments from an already overtaxed transport industry!

The EU Authorities must play a responsible facilitating role in these matters. At the same time, important value can be obtained via 'exchange of best practice', establishment of common standards, aid schemes, research, simplifying &, where applicable early repeal, of existing legislation.

Any future costs/burdens placed upon transport operators must be seen to be genuinely offset by: better access, less congestion, less pollution, better & more sustainable mobility, better safety and security, much improved traffic management, coordination & real improvements in parking arrangements/facilities, extended delivery hours and periods of loading and unloading, better signposting and recognition of the needs of 'specific' operators/service providers – **with practical exemptions and derogations** where relevant.

## General matters

**In asking that the above important points be taken into account, we put forward the following general comments/views in relation to the potential role of the EU in relation to Urban Mobility planning**

The EU could play an important role in the 'drive' towards:

### 'Free-flowing towns and cities'

- Approving/harmonising standards, rules, signposting, information
- Coordinating best practice
- Controlling unfair restrictions on mobility, access or service providers
- Ensuring that any 'charges' imposed on 'transport' are ring-fenced for future development and improvement.
- Developing and promoting 'walking' and 'cycling' (coupled with suitable/safe paths and cycle-routes) as alternatives to the use of cars.

### 'Greener towns and cities'

- Extension, rehabilitation and upgrading of clean urban public transport such as trolley buses, trams, metros and suburban rail as well as other sustainable urban transport projects
- Engine/fuel improvements driven by research and technology co-funded by the EU
- Incentives and funding assistance to enable operators to purchase and operate cleaner & more energy efficient vehicles
- Exchange of best practice with countries outside the EU as well as between EU Member States
- 'Green' public procurement of passenger and utility vehicles used inside cities/towns
- Encouragement/training in 'Eco-driving'
- Clear guidance and harmonised rules in connection with any 'Green Zones' throughout Europe
- **It is important to note that heavy duty vehicles are not the main cause of urban pollution** and must not be unfairly targeted by any initiatives to introduce urban charging and environmental performance standards.

### ‘Smarter urban transport’

- Better dissemination of good practice/information and better use and creation of ‘Intelligent Transport Systems’
- Introduction of data exchange protocols
- Standards that are interoperable and open to innovation
- Interoperable ‘smart cards’ that can be used between transport modes, between various functions (parking/transport related payments/customer loyalty schemes etc), between areas and, in the longer term, between countries.
- Informed choice – via better information
- Integrated systems that combine intelligent route planning, driver assistance systems, ‘intelligent vehicles’ and interaction with infrastructures

### ‘Accessible urban transport’

- Better attention to ‘co-mobility’/integrated collective transport solutions ( Well located Park & Ride facilities; **better parking facilities which must be suitable and secure for large commercial vehicles** as well as cars; improved urban infrastructure – roads, walkways, cycle routes, bus stops, terminals; better connections between buses, trains, metro, taxi and other passenger transport modes; better connections between airports and city/town centres; intermodal freight terminals and good connections/dedicated traffic lanes etc to and from ports/railheads etc
- Comfortable and safe public transport to encourage passengers/car users to ‘change habits’ – perhaps backed up by a European Charter on rights and obligations for passengers using collective transport.
- Better attention to the mobility and access requirements of older people, disabled people, families with young children & young children themselves
- Making ‘mobility’ options affordable as well as attractable to all citizens
- **Whilst the use of smaller vehicles may be desirable in some situations; delays, damages and losses during transfers from large vehicles to small vehicles or via consolidation depots could prove to be very costly and unacceptable to both customers and commerce.** Furthermore, several small vehicles, instead of one larger vehicle, will add to congestion and pollution thereby defeating the aims of accessibility and ‘green’ improvement
- Taking note of ‘Tourist Seasons’ and making specific additional planning arrangements accordingly
- **Better coordination between ‘Urban Authorities’ and those in ‘wider conurbations/suburban areas’ – particularly in respect to transport needs and social service provisions** – with better planning to integrate passenger and freight transport mobility provisions into future urban/suburban planning
- A reduction in the number of ‘authorities’ involved in planning projects in order to provide a more coordinated approach with less ‘red-tape’.

### ‘Safe and secure urban transport’

- Better design of infrastructure especially in relation to busy intersections, major exchange points
- Improvement of road safety orchestrated by the European Commission promoting best practices and engaging in more intensive and structured dialogue with local and regional stakeholders and with Member States, notably on new technologies – in particular ‘Intelligent Transport Systems’ – for increasing safety.
- Education/Information campaigns
- Safer behaviour by cyclists (helmets, road etiquette, consideration of other road users, ‘safety reflective’ clothing, age limits {upper & lower} for cyclists in busy traffic areas, special training for young cyclists & strict enforcement of traffic rules). The strict enforcement of traffic rules should also extend to motorcyclists and scooter riders.
- High quality infrastructure including: good pavements/cycleways, better lighting, more visible enforcement officers, incorporation of safety and security standards into urban infrastructure design

- **Rapid information facilities and safety-based traffic management**
- Taking into account the 'anti-terrorism' aspects
- Safer/more visible vehicles : visibility/audibility of pedestrians/cyclists etc

#### **'Improving knowledge and data collection'**

- The EU should play a greater role in education, training and awareness by facilitating the organisation of new partnerships, new planning methods, staff training and exchange actions in order to enhance a new 'urban mobility culture' throughout Europe.
- Bringing all Stakeholders together in developing such a 'culture'
- Increase public awareness regarding the European Commission's activities in connection with sustainable mobility.
- **Provide better and more inclusive data on urban mobility statistics to help decision-makers and practitioners at all levels.**
- Act as an information platform and exchange platform for best practices

#### **'Finding Financial Resources'**

- All stakeholders at local, regional, national and EU level must contribute
- **All revenues from parking, 'green zones', congestion areas or any future road charging fees etc should be ring-fenced to improve mobility for ALL users and providers of transport services.**
- Transparency in all financial matters
- Continued & improved funding from Structural Funds, the Cohesion Fund and loans from the European Investment Bank – but in making any such funding available fairly across the board to all forms of mobility planning i.e. for freight consolidation depots and not just railways and terminals; for retrofitting and upgrading trucks and not just railway rolling stock, buses, metro systems etc, and; for positive traffic management and improved parking/loading & unloading facilities and not just congestion/low emission zones etc.
- A dedicated EU support programme for financing 'clean' urban transport activities in addition to continuing the present CIVTAS Initiative.

#### **Specific considerations for the 'Removal Industry'**

We conclude by emphasising that:

- 'Household Removal Vehicles' usually spend more time 'parked' outside clients' residences, during the necessary long periods for loading/packing - unloading/unpacking (i.e. very low mileage as opposed to 'other transport modes' which spend most time travelling on city/town streets or highways);
- Consignments are of a light/volume nature (i.e. less wear and tear as opposed to those involved with the carriage of heavy loads);
- There is an initial very expensive capital outlay to purchase vehicles, build specialised bodies (suitable for good access, protection and security for valued household and often sentimental items) which also need to accommodate crew cabs suitable for two or more workers (compared to usual solo-use on 'general haulage work')
- Removers, traditionally, have been in the habit of keeping, maintaining and depreciating their vehicles over a longer periods than most other road transport operators (usually around 10-12 years and more compared with the more usual 5-7 years or so for 'general transport' operators) but at the same time are obliged to meet the rigorous annual testing requirements applicable to all commercial vehicles..

Removal vans, therefore, create far less pollution, congestion, noise, safety risk etc than many other forms of urban transport.

We highlight this in order to example the need for special consideration, exemption or derogation **where relevant**, in any future urban planning arrangements.

## **Examples of problems arising**

The recent introduction and growing trend for 'Low Emission/Environmental Zones' & restrictions throughout Europe is having a serious affect on the Removals Industry which is 'being forced' to re-schedule replacement-vehicle or 'upgrading' programmes and take other measures into account:

- by having to invest in very expensive vehicles at an 'earlier than planned stage', or;
- by having expensive 'Particulate/Filter traps' fitted to what in many cases are already fairly old vehicles, or;
- by having to limit/choose which vehicles they are able to send into particular city centres/zones, or;
- when permitted, by having to pay what seems to be exorbitant fees to enter such 'Zones' bearing in mind all the other tolls, taxes, licence fees and duties etc already applying to commercial vehicle operation.

In addition, 'huge losses' have to be absorbed:

- on 'earlier-than-expected' depreciation planning
- reduced 'second-hand' values when trying to sell/part-exchange older vehicles (when this is even possible in the first place)
- the ups and downs of the housing market and effects of economic problems outside the operators control

The problems are compounded by the fact that such 'Zones' are being established on national bases at regional and even local levels - with what appears to be no coordination between countries or, in some countries, even between cities - resulting in different rules, different schemes and different charges throughout Europe.

Derogations for Removal vans and/or lorries of a certain age are sometimes different from one country to another.

It would also appear that 'assistance funding/incentives' to upgrade or replace older vehicles are available in some EU Countries and not others.

Special consideration also needs to be taken in respect of the plight of companies, through no fault of their own, which have ended up by default with an operational centre inside limited/restricted environment/congestion zones.

## **FEDEMAC's Position**

As a responsible industry we support sensible planning and sustainable moves towards improving Urban Mobility as well as easing problems for health risks, climate-change and congestion, etc - but not at the expense of commerce, employment security and a mishmash of different rules being forced upon industry, at an unsustainable pace, with a lack of clear understanding/coordination across Europe and a lack of consideration for specific implications for certain niche but still important industries.

Removal companies do not have alternative choices: Removal vans and trucks are the only means of collecting/delivering bulky household goods/office furniture etc to/from urban residences/locations. The actual origin and destination service cannot be done/reached by rail, canal, sea, air or any other transport method. Furthermore, most operators & drivers also make conscientious, realistic decisions and do not send commercial vehicles into cities/towns unless it is necessary: it is uneconomical and impractical to do otherwise!

We are all trying to 'improve' matters and the 'transport industry' has made huge strides forward with trucks today being much quieter, safer and eighteen times less polluting than those sold fifteen years ago. So real improvement is being made but it has to be at a sustainable rate to allow commerce to adjust - and such sustainability will differ between one mode and another and also between and within different sectors, perhaps with the acknowledgement that some providers may need 'temporary' exemption or assisted 'funding' in order to adjust without companies being forced into unwelcome closure, sale or liquidation.

**FEDEMAC - on behalf of the European Removals Industry advocates:**

- Temporary Exemption and consideration of funding assistance for recognised niche providers, such as Removal/Relocation companies, within the transport industry in order to accommodate sustainable adaptation
- European control over the present 'patchwork' creation of Environmental Zones that are appearing throughout Europe
- Harmonisation of the compliancy rules/requirements in relation to Environmental Zones
- Easy understanding/easy practical operation/easily accessible translation facilities and the provision of a 'central' website covering information on EVERY Zone throughout Europe.
- Standardised on board information and intelligent transport systems throughout Europe in order to avoid the need for multiple units/systems for different vehicles.

Without such provisions we are in danger of national, regional and local schemes 'running wild' with a huge cost in terms of employment, inflation, service needs, competition, 'freedom of movement' within the EU and the long term damaging affect upon the progress of 'uniting' Europe.

**Tony Richman**



FEDEMAC European Affairs Representative  
c/o 17 Russett Close, Aylesford, Kent, ME20 7PL, UK  
T: + 44 1622 791358  
M: + 44 7720 553451  
E: [tony.richman@fedemac.com](mailto:tony.richman@fedemac.com)

Head Office:  
FEDEMAC The Federation of European Movers Associations  
Schulstrasse 53, D-65795 Hattersheim am Main 1, Germany  
T: + 49 6190 989811  
F: + 49 6190 989820  
E: [headquarters@fedemac.com](mailto:headquarters@fedemac.com)  
[www.fedemac.eu](http://www.fedemac.eu)

## about FEDEMAC

**FEDEMAC** (originally CODEMAC) was first founded in 1959 when a number of National Removers Associations within Europe formed a coalition to exchange views and information. In 1965 the name was changed to FEDEMAC –The Federation Des Entreprises de Déménagement Du Marche Commun – but, whilst the abbreviation remains, the organization is now referred to as The Federation of European Movers Associations.

**FEDEMAC** was registered as an independent European organisation on 1 January 1995. Today it represents the interests of around 4,000 Professional Removals Companies in 25 European Countries.

**FEDEMAC's** main function is to co-ordinate national activities at a European level. Much of this work is centred on lobbying at the EU Parliament and Commission; liaising with national/international associations and other trade orientated organisations such as the IRU, MPE, the WCO and BEUC; and, undertaking other activities at national and EU level as appropriate.

**FEDEMAC** works continuously towards the harmonisation of working methods; quality standards; training; and, co-operation within the Moving industry throughout Europe.

**FEDEMAC** is also at the forefront of encouraging and assisting with the establishment of National Trade Representation and Associations for the Removals Industry in 'New' E.U. Member States. Communication; magazines; newsletters; e-news bulletins; directories; regular meetings; and, the use of modern IT tools form an important part of this work.

FEDEMAC Schulstrasse 53, D- 65795 Hattersheim am Main 1, Germany  
Tel: + 44 6190 989811 Fax: +49 6190 98 98 20 [www.fedemac.eu](http://www.fedemac.eu)