

UEAPME Transport Forum

Position

EU Commission's Staff Working Document on Transport Security

Background

The European Commission published on 31st May 2012 a Staff Working Document on Transport Security (SWD(2012)143 final) aiming to set up common security requirements for the land transport sector. The Commission expresses its intent to secure urban public transport, rail passenger traffic, goods transport on road, rail and inland waterway against all risk's cause.

At the same time, data provided by the Commission on the theft of goods from trucks in the EU estimates a cost of more than € 8 billion euros per year.

General remarks

In principle, UEAPME TF approves the aspirations that aim at guaranteeing a certain level of security in the transport sector with regard to ordinary criminal activities as well as terrorist acts.

Nevertheless, UEAPME TF strongly urges against excessive security measures that will never be able to guarantee a full security.

Taking into account the particularities of the road transport sector and keeping in mind that 80% of the transport companies are SME's, if a measure is not realistic for them, it should not be hold back, as it risks to disturb an important part of the transport market.

Specific remarks

UEAPME TF considers that the achievements of the Commission's proposals have to be respectful of the following recommendations:

- The development of transport security policies should take the principle of subsidiarity into consideration.
- An excess of security measures should be avoided. The various already existing security regulations for land transport must be pointed out.
- Raising the level of security, could minimise the frequency of ordinary criminal activities but not terrorist acts.
- The relation between costs of the higher level of security and costs of the property damages at the given security level has to be taken into account. A balanced approach is required and no excessive security controls and exorbitant additional bureaucratic burdens have to be imposed.
- Point 4.1.1. - *Security of transport interchanges and mass transit security*: this point has to be examined very critically. According to it, transportations that precede or follow air traffic should also be submitted to the security requirements that are specific to air transport.

- Point 4.1.3. – *Training of staff*: this point has to be carefully evaluated. In fact excessive security requirements carry the risk that staff working in land transport is endangered by far too high demands on qualifications.
- UEAPME TF strongly opposes the Commission’s idea of introducing a European standard for “end-to-end security”, and all reanimation of this topic.
- The European Committee for Standardization, CEN TC 379 on supply chain security concluded, after years of study work, that a standard was not needed and a voluntary good practice guidebook was found sufficient. The CEN TC 379 on supply chain security decided on the development of a crime incident reporting standard, which is positive for SME’s, for who harmonization is helpful in this matter. A crime incident reporting standard will improve the handling of the data related to crime incidents in the supply chain. The use of the report form will make it possible to set up a central databank with registration of all transport related crime incidents. This databank will be an important tool in prevention of incidents and will make transport criminality more visible.
- The conclusions of the TC on supply chain security should be accepted and followed. SME’s are best served by a voluntary good practice guidebook made and used by operators. The guidebook will serve as a low cost and user-friendly tool.
- UEAPME TF agrees with the statement under point 4.1.8. – *Security of the Supply Chain* that ‘end-to-end security’ cannot be maintained comprehensively, nor can be independent from risk appraisals. In reality, huge portions of local and regional goods transport - including distribution traffic – cannot be subjected to such encompassing security measures.
- UEAPME TF extremely supports point 4.1.9. of the working document, facing the necessities of *Secure Lorry Parking*.

Tacking into account the above mentioned elements, by all means any new proposal has to be adequately proportional to its purpose as well as to the inherent implications and costs for the economy.

UEAPME TF strongly expresses the willing to take part in the Advisory Group on Land Transport Security set up by the Commission in order to collaborate in a balanced, not excessive, development of European policy on land transport security.

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