

European Commission  
Directorate-General MOVE  
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Brussels, 1<sup>st</sup> March 2010

Re: Decision of Trenitalia to stop the transportation of dangerous goods by single wagons as from 1<sup>st</sup> April 2010

Dear Mr. Ruete,

ERFA has been notified by several of its members about the decision of Trenitalia to stop the transportation of dangerous goods by single wagons as from 1<sup>st</sup> April 2010 onwards (initially 1<sup>st</sup> March 2010).

This decision will have far reaching consequences for the downstream market in Italy but also for other countries adjacent to the most important rail corridors, i.e. the north-south axis. Our concerns are manifold and we have outlined the most relevant and harmful ones below:

- Intramodal issue: Trenitalia has the *de facto* monopoly on single wagon traffic. Access to and usage of the train formation facilities necessary for assembling single wagons to full trains is not possible for other incumbents / private operators not belonging to Trenitalia.
- Intermodal issue: Single wagon loads will have to be transported in road-trucks instead of rail-wagons. However due to the adoption of new tunnel-provisions in the "European Agreement concerning the international Carriage of Dangerous Goods by Road - ADR", which came into force on 1st January 2010, some ADR-countries, including Switzerland, will not allow dangerous goods in road tunnels anymore.

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- In environmental terms: The forced shift of dangerous goods from rail back to road will undermine seriously the environmental objectives of the EU (noise reduction and CO2 emissions) as well as safety due to an increasing number of lorries transporting dangerous goods over long distances and in geographical difficult regions (mountains, tunnels, ...).
- In economical terms: Production sites will not only stop their investments in rail and its infrastructure (sidings) but also contribute to an overall reduction of rail freight volumes in the downstream market (block train traction providers, ports, terminals, etc.).

For all the reasons outlined above, we urge the European Commission to

- take the necessary actions to reverse the decision of Trenitalia;
- to start a permanent dialogue between the EU and the Italian government about national measures and the future of the Italian rail freight market both in intermodal and intramodal terms;
- to develop alternative innovative solutions with the Italian government, such as the introduction of short-line operations provided by alternative suppliers;
- to consult all stakeholders (public & private railway undertakings, wagon keepers, shippers, forwarders and infrastructure managers) to develop together potential alternative solutions coherent with the overall EU objectives in rail freight;
- to include Switzerland in the process as one of the countries being substantially affected directly by the decision of Trenitalia.

We also wish to underline that ERFA fully supports initiatives of other stakeholders meant to maintain the single wagon business in Italy, e.g. CEFIC, CER, UIP.

Yours sincerely



Ms Monika Heiming  
Secretary General of ERFA