



## JOINT POSITION ON THE REVIEW OF THE COMBINED TRANSPORT DIRECTIVE

Brussels, 15 March 2018

We, the above signed organisations<sup>1</sup>, believe that the new proposal to revise the Combined Transport Directive offers good grounds to encourage the use of combined transport in order to achieve a more resource efficient transport and logistics network. We support a multimodal transport where a major part of the journey is carried out by rail, inland waterways or sea, and the initial and final part is carried out by freight road transport. The revised Combined Transport Directive shall pave the way for efficient intermodal and multimodal freight services offering a level playing field for all modes of transport.

### Overview

Considering the fact that both the transport and logistics sector and the Member States can benefit from combined transport, it remains important that the right framework and conditions are provided, combined with the right infrastructure policy. Therefore, a holistic approach towards the logistics chain should be adopted, taking into account the geographical scope at national and international level.

It is of utmost importance that the new proposal reflects the market requirements and the needs of European multimodal operations. The new Combined Transport Directive must be inclusive of the ambitions set out by all actors involved in intermodal transport, including road, rail, short sea shipping and inland waterways. It is essential that each mode can rely on this legal text to deliver appropriate services to optimise combined transport of goods. This includes making sure that there is sufficient capacity of infrastructure and facilities for last mile operations, including multimodal terminals, so that goods can be transhipped to their customers in the most efficient and cost-effective manner. It must guarantee a level playing field offering the same benefits and treatments to all modes involved.

### Scope

The above signed organizations welcome the clarification of the definition of Combined Transport to all modes of transport and the flexibility offered in determining the length of the road leg, subsequently allowing for adaptability when taking into consideration the specific geographical or operational constraints in Member States.

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<sup>1</sup> These associations are also members of the "Industry Alliance for Multimodal Connectivity and Logistics for Growth - I AM Alliance".

### **Development of Terminal Facilities**

It is vital that the measures to provide financial support for terminal investment are subject to proper ex-ante scrutiny, joint with coordination between Member States to ensure the avoidance of possible overlapping investments between Member States in close proximity.

Where there is existing under-capacity, prioritization should go to the expansion and improved access to existing facilities. The priority of support measures should be to ensure that the potential of existing facilities is maximised.

Furthermore, Members States' support for the construction of new terminals should be used only where there is not an existing market for combined transport operations. Any financial assistance for the development of new terminal facilities must be transparent and carried out via a public tender.

This will ensure that the Directive avoids creating situations whereby new terminals are developed with financial support which compete directly with existing terminals which have been established without financial support, thereby creating a distortion of competition and possible overcapacity. The objective of financial assistance for terminal development needs to be to create new markets for combined transport, and not enter into existing and functioning markets.

### **Transport Documents**

For reporting purposes, the future Combined Transport Directive should aim to promote the introduction of a system based on electronic data sets, which could fully replace the outdated paper document and stamp system. The objective should explicitly favour the electronic provision of data, based on the international conventions, rather than paper documents.

The evidence to be provided by the shipper of compliance with the 'combined transport operation' definition – to aid enforcement – should be separated into two groups: (i) documentation on how the combined transport operation was planned should accompany the loading unit on its entire journey, ready to be presented during a roadside check, while (ii) evidence of how the combined transport operation was executed, as well as any justification of deviation from the original plans should be delivered during an ex-post rectification of suspected disparities.

### **Reporting and Monitoring**

The Data to monitor and report the performance of the combined transport in Europe and the method of collecting such data from all the Member States should be harmonized and standardized in a delegated act, which is to be drafted in consultation with intermodal sector stakeholders to ensure that it imposes the minimum administrative burden, enabling quick and easy delivery from existing IT systems.

Member States, in this sense, should be able to deliver a comprehensive biannual national report on intermodal transport, which also explains how state-aid measures serve the original purpose of the Directive. The drafting process should be a valuable occasion for modal units of the ministries to collaborate in a much-needed, but rarely seen horizontal manner.

## **Conclusions**

The above signed organisations call upon the European Parliament and Council to adopt the proposed revision, subject to clarification on the above raised points.

The proposed revision of the Combined Transport Directive also constitutes an interesting opportunity to launch a debate about the level of political will and commitment from all parties (i.e. the European Commission, the Members States and the Transport Sector) in favour of multimodality. Active discussion is needed at European level to further outline how the European logistics chains can become truly multimodal.

The proposal of the Combined Transport Directive offers a good basis to encourage the increased use of multimodal transport. In order to achieve the modal shift objectives however, other challenges need to be equally addressed. Reducing the regulatory competitive disadvantages experienced by rail, short sea shipping and inland waterways, as well as improving cross-border connections, will further strengthen multimodal, and with that combined, transport. In addition to the proposal's national incentives, multimodality should also be strongly supported by the next Connecting Europe Facility.