



UNION EUROPÉENNE DES TRANSPORTEURS ROUTIER

UETR position on the revision of the combined transport Directive

INTRODUCTION

UETR supports the revision of Directive 92/106/EEC¹ in order to adapt legislation to contemporary challenges and opportunities, better serving the needs of both transport operators and society while advancing the overarching goals of efficiency, sustainability and economic growth.

Cooperation among modes of transport is essential for building an efficient, sustainable and integrated transportation network. However, UETR does not support a forced transfer from road to other modes and stresses the need for the respect of the principle of fair competition, which will not be achieved by measures to support one mode to one another's detriment when unduly justified.

UETR would like the EU policy makers to take into account the following remarks:

DEFINITION OF COMBINED TRANSPORT

EC proposal: Article 1 Amendments to Directive 92/106/EEC -Article 1c, 2(a) A combined transport operation shall meet the following conditions: except for operations referred to in point (b), the operation produces at least 40% less external costs than the alternative unimodal road transport operation;

UETR believes this definition is incorrect, being based on reducing external costs by 40%, comparing the intermodal operation with a unimodal road operation, without detailing the different types of intermodal operation: maritime intermodal in relationship between ports and inland areas; land intermodal in different loading units and rail motorway, both with containers and especially with road semi-trailers. UETR stands for the adoption of definitions that truly respond to the needs of the service typologies and not only to environmental criteria. Intermodal and combined transport is a complex ecosystem and definitions should not be reduced just to the objective of reducing external costs.

UETR proposes the following definitions:

Maritime-Land Intermodality - "Operation of transport of goods in various types of loading units, using various means of transport in which the journeys made by ship are longer than those made by train and/or lorry and/or in all operations classified as short sea shipping and which is used to give continuity to maritime transport, extending the hinterland of the ports to the interior of the peninsular or continental territory"

Land Intermodality: "Operation of goods transport in various types of loading units, carried out entirely by a combination of train and lorries means of transport, including the entire peninsular or continental territory".

¹ *Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Council Directive 92/106/EEC as regards a support framework for intermodal transport of goods and Regulation (EU) 2020/1056 of the European Parliament and the Council as regards calculation of external costs savings and generation of aggregated data - COM(2023) 702 final (https://transport.ec.europa.eu/document/download/9024df1d-7fd9-439d-aa57-478f336f8dc8_en?filename=COM_2023_702_1.pdf)*



SUSTAINABILITY AND LACK OF DEFINITION IN THE CALCULATION OF EXTERNAL COSTS

EC proposal: Article 1 Amendments to Directive 92/106/EEC

-Whereas 13 A common harmonised calculation methodology with reference values of external costs or sources of such reference values needs to be established and updated regularly, keeping the pace with developing knowledge and evidence base. Therefore, the exact methodology should be established by means of an implementing act, calculated in accordance with to the unit values established in the Handbook on the external costs of transport, in its up-to-date version.

-Art. 1c, 6 The Commission shall adopt implementing acts establishing detailed rules for the calculation of external costs referred to in paragraph 2 of this Article. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 9d(2).

Neither the criteria (by service, by company, by Tn or Tn/km, by train, etc.), nor any explanation of how they are calculated are indicated, the proposal only states that this will be established by another act. This means that we cannot really make a serious assessment of whether the 40% mark is realistic or not, as we do not know the factors taken into account to calculate external costs, so it is difficult to say whether what is proposed is realistic, very ambitious or impossible to achieve.

MEASURES FOR ROAD HAULAGE COMPANIES.

EC proposal: Article 1 Amendments to Directive 92/106/EEC

-Par (10), Art.9a

Vehicles carrying out road legs of combined transport operations shall be exempted from weekend, night and holiday driving bans applying to heavy goods vehicles only. That exemption shall not apply in the event of general driving bans applicable to all vehicles used for private purposes.

We do not support this approach as it creates a situation of unbalance-unequal treatment with the rest of the road transport sector. This being based on mere assumption that combined transport is safer, which is not correct. UETR supports the existence of corridors open 24 hours a day, 365 days a year, guaranteeing the free movement of goods, regardless of whether it is carried out by railway or ship.

Regarding the 150 km limitation from/to rail terminal, we propose that this maximum distance can be exceeded as long as there is no terminal within this radius with a rail service compatible with the service to be carried out.

EC proposal: Article 1 Amendments to Directive 92/106/EEC

-Par (4), Art. 2

No quota systems and systems of authorisations shall apply to the intermodal transport operations.

We do not agree as it leads to unfair competition.

UETR believes that the lack of incentives for the promotion of regular services leads to a lack of quality services capable to adapt to the flexibility provided by road transport.

Moreover, by proposing a compulsory modal shift, agreements, and success stories such as Short Sea Shipping (SSS) are not promoted, with goods moved purely by road shifted successfully to maritime transport. This has been achieved because a real effort has been made to understand the needs of freight transport, e. g. the efficiency and effectiveness of transport, with a large part of maritime transport being receptive. In order to be able to cooperate with road transport, it is necessary to provide extremely effective, regular, quality services.

We also highlight the lack of initiatives to bring rail closer to road. We propose that instead of the road being brought closer to other modes, it should be those other modes to adapt to the road, as 80 % of goods in the EU are transported by road.



EC proposal: Article 1 Amendments to Directive 92/106/EEC
-Par (5), Art. 3a, 2(c)

The measures referred to in paragraph 1 of this Article shall aim to achieve the following objectives when compared to the baseline assessment included in the report referred to in Article 5(1): where relevant, the establishment of new rail, inland waterway or short sea shipping connections between previously not connected intermodal transshipment terminals.

We believe incentives should be applied to those road hauliers using rail, as with Short Sea Shipping.

EC proposal: Article 1 Amendments to Directive 92/106/EEC
-Art. 1c, 3

The road transport of an empty container used for a given operation from or to a container depot before or after the loading or unloading point, where such transport is subject to the same transport contract, shall be considered an integral part of the combined transport operation. Any other movement of road vehicles before or after loading or unloading point shall not be considered part of the combined transport operation.

We do not agree that empty returns should benefit, as they do not contribute to modal efficiency.

TRANSPARENCY REQUIREMENTS

EC proposal: Article 1 Amendments to Directive 92/106/EEC
-Art. 1a

This Directive establishes a support framework for intermodal transport operations carried out fully or in part in the territory of the Union. It also lays down rules on transparency requirements for intermodal transshipment terminals

Transparency must apply to each and every participant in intermodal transport.

TARGET OF REDUCING THE AVERAGE DOOR-TO-DOOR COST BY AT LEAST 10%. WITHIN 7.5 YEARS

EC proposal: Article 1 Amendments to Directive 92/106/EEC
-Art. 3a, 2(a)

an overall reduction of at least 10% of the total costs of combined transport operations in their territory borne by the undertakings organising combined transport operations by [PO, please insert the date: 90 months, i.e. 7 years and 6 months after entry into force of this Directive];

This target seems not at all ambitious. Too little reduction over such a long period of time, which will not favour the development of intermodal transport. Moreover, no clarity is provided as it does not indicate which parts, elements or actors of the intermodal chain should be affected and how much.

CONCLUSIONS

UETR welcomes the revision of the Directive for an effective transport ecosystem in the EU, enhancing real and mutually beneficial cooperation between the different modes of transport.

UETR highlights the following points to be addressed:

- Definition of combined transport
- lack of methodology of calculation of external costs
- lack of incentives/measures to promote the use of road transport
- Social and economic sustainability dimension



- Ensure fair competition between all modes of transport by encouraging measures to support one mode over another under the criterion of being duly justified
- Need to introduce measures to promote quality regular services moving goods at the time requested by customers and owners of goods.

End

About UETR

UETR is the European umbrella organization representing and defending the interests of more than 200.000 road transport undertakings (mostly Micro, Small and Medium Enterprises) with a total capacity of more than 430.000 commercial vehicles. Within the Union, 95% of the road haulage companies are micro-enterprises with less than 10 employees (small firms or one-man operations). For more information visit www.uetr.eu

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