

UIRR, the industry association of Combined Transport



























































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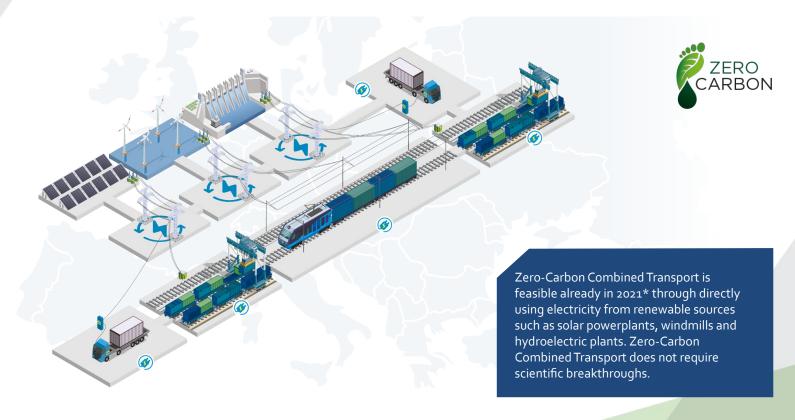


International Transport Forum



Zero-Carbon Combined Transport: the future in Europe





SILK ROAD SUMMIT 2023 30 November 2023

Intra-EU and intercontinental: shared objectives





- Regulatory alignment harmonised technical and administrative rules
- Operational transparency real-time information
- ☐ Harmonised political objectives climate, environmental, transportation
- Interoperablity infrastructure, IT systems, mobile assets, technical standards
- Capacity coordination train paths and transhipment
- Business models businesses, digitalisation, authorities, products
- **State aid** uniform objectives, coordinated support measures



The UIRR Intercontinental Platform: linking Europe to Asia



- Analysis of the vision and strategies of the transport modes: road, rail, IWW, maritime on intercontinental relations to/from Europe
- Evaluation of policy- and regulatory initiatives
- Development of scenarios for 2030 and 2050



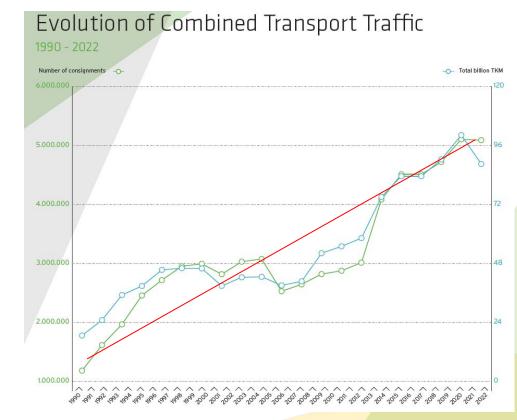
- A. Train composition alignment
- B. Facilitation of dangerous goods and customs
- C. Harmonisation of processes and documents
- D. Operational information transparency increase
- E. Regulatory transparency
- F. Transparency on temporary economic support
- G. New business opportunities
- H. Synchronised infrastructure capacity building

Greening Freight Package: Europe's historic opportunity



- CT Directive amendment: improved definition and enhanced benefits + transparency and accountability
- CountEmissionEU Regulation: emission assessment standards for logistics chains
- Rail Capacity Management Regulation: more and better train paths for freight
- Weights and Dimensions: compatibility with intermodal transport maintained





Greening Freight Transport Package: overall objectives

Policy objectives:

- decarbonisation of European freight transport
- zero pollution (air quality + noise)
- boost energy efficiency
- boost interoperability
- boost operating efficiency of road transport
- equivalence between CT road legs and road transport on cross-border relations
- technology neutrality
- promotion of intermodal freight transportation
- + fossil fuel decoupling
- + reduced road-degradation, less road-congestion and fewer road-accidents
- + long-distance truck driver shortage
- Combined Transport delivers on every policy objective in an efficient, affordable, industrial-scale and low-risk way

PRINCIPLES TO BE UPHELD THROUGHOUT THE PACKAGE

- interoperability and technology neutrality
- the long-distance low-density cargo segment can not be protected for road transport – which is the largest source for modal shift





POSITION PAPER

Greening Freight Transport Package: protectionism or rebalancing?

Something must be wrong with road transport – this is the quick conclusion if confronted with the sector's

- a continuous carbon footprint increase,
- ever growing pollutant emissions.
- lacklustre energy efficiency improvement,
- relentless increase of fossil fuel demand.
- more and more noise.
- persistently poor safety performance, as reflected in accident statistics,
- unabated road congestion,
- rapidly deteriorating road infrastructure,
- an unresolved truck driver shortage and continuous social issues.

Reading the list, one may easily conclude that the 76% market share of the road sector is not only exaggerated, but it is simply unsustainable.

Trucking companies are increasingly resorting to borderline legal business models complemented by fierce lobbying to uphold the low freight rates, which enabled the conquering of a 'three-quarters slice' of the freight transport pie.





Should the prevailing market share of the road sector be maintained – confirmed by legislative means – while simultaneously neutralising 'peripheral concerns' such as the carbon footprint, pollutant and noise emissions, wasteful use of scarce energy resources, rapid infrastructure degradation, labour and land overuse, a dismal safety record, and endless congestion, which costs society 1-1,5% of GDP annually?

Road sector advocates clearly say yes to this question.

The low freight transport rates, desired by shippers and consignors, can only be provided by unimodal long-distance road haulage if it is accompanied by increasing costs to society and public budgets. The severity of the costs required from society has been rapidly growing: climate change, energy scarcity, health concerns, congestion and accidents, deteriorating road and bridges, and the lack of willingness for the young to become truck drivers. By today, however, the Combined Transport alternative to unimodal long-distance trucking emerged as a door-to-door freight transport solution capable of similar low freight transport rates but without much of the burden to society.

Policies should be employed to rebalance the modal share of the long-distance freight transportation services that we need. The sacrifices imposed by the dominance of unimodal long-distance road haulage are not unavoidable. There is a way to break the excessive and unsustainable dominance of long-distance trucks.

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Greening Freight Transport Package: Rail Infrastructure Capacity Management Regulation



Complicated new structure:

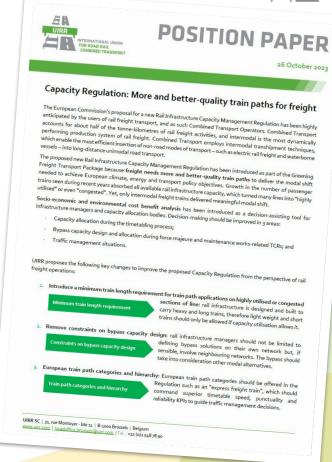
- ENIM + Network Coordinator
- ENRRB (regulatory oversight)
- Review Board (to assist COM)

Legislation delegated:

- Rules should be adopted by ENIM COM delegated acts only if needed
- European framework inadequately defined in the EU legislation too much room for ENIM to define rules

SUGGESTED CHANGES – UIRR AMENDMENTS

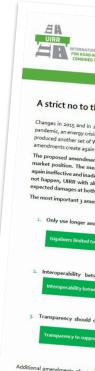
- European train categories and their hierarchy for timetabling, for TCR bypass and to quide traffic management
- Minimum train length on "highly utilised"/"congested" lines: ? 200m-long trains
- Remove modal and network constraints from TCR bypass capacit design
- Deadlines: do everything as soon as feasible support ERFA position



Greening Freight Transport Package: Weights and Dimensions Directive amendment



- Declared objectives: decarbonisation/efficiency and promotion of intermodal
- "Decarbonisation"/"efficiency" = +2 tonnes of weight for batteries, undefined gigaliners and 44-tonne gross vehicle weight across EU borders
- "Intermodal" = potential additional GVW including semi-trailers, +30cm HQ containers on road, definition from amended CTD
- EVALULATION: superficial distractions to enable EMS/gigaliners even at the cost of further fragmentation of the single market – and to allow 44-tonne GVW across borders with diesel-powered engines; the proposal breaches the principle of "technology neutrality" while "interoperability" requirements are missing
- SUGGESTED CHANGES UIRR AMENDMENTS:
 - interoperability must be required (in the related type approval regulation amendment)
 - gigaliner sizes should be clearly defined including number of tractor axles on 44t GVW combos – must be compatible with intermodal transport
 - Freight Transport Information Portal should be produced by the European Commission



POSITION PAPER

A strict no to the Weights and Dimensions Directive amendment

Changes in 2015 and in 2019 to the Weights and Dimensions Directive (WDD) did not deliver amidst the COVID pandemic, an energy crisis and the war in Ukraine. Perhaps more time would have been needed, yet the Commission produced another set of WDD amendments just 4 years after the last changes to the Directive. The proposed WDD amendments create again uncertainty while offering regulated competitiveness to road.

The proposed amendments – if left unchanged – will do nothing more than protect the road sector's present market position. The measures offered with the pretext of promoting intermodal freight transportation are again ineffective and inadequate. The best solution would be withdrawing the amendment proposal. If that does not happen, UIRR with all its members will propose a series of amendments to neutralise some of the worst The most important 3 amendments:

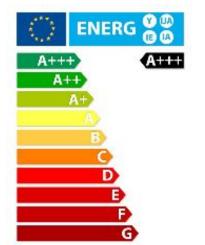
- Only use longer and heavier trucks, where non-road alternatives do not exist: incentives are needed so that European Modular Systems – gigaliners or megatrucks – sigaliners limited to where they belong are used only where no alternatives exist. The long-distance
- inland transport market segment for lighter weight palletised cargo should be kept open to intermodal competition. 2. Interoperability between the different transport modes (a.k.a. "kombifähigkeit" or intermodal
- compatibility) of all technical dimensions or weight allowances, as well as the technical solutions that are offered must be a mandatory requirement.
- 3. Transparency should counterbalance heterogeneity: a European Freight Transport Information Portal (EFTIP) should be established to provide information on the ransparency to support single market applicable rules in the Single European Transport Area and to provide an insight into the Member State choices enabled under the subsidiarity principle in the proposed amendment.

Additional amendments of a technical nature or motivated by fairness and equality will be proposed later, while amendments will also be suggested to the proposed new CountEmissionEU Regulation and to the proposed amendment of the Combined Transport Directive (CTD) with the motivation of correcting some of the excesses of the WDD amendment. The 3 legislative proposals of WDD, CountEmissionEU and the CTD therefore belong together

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Greening Freight Transport Package: CountEmissionsEU Regulation

- Well-to-wheel basis following the ISO14083 standard
- Optional to use, but if declaring carbon footprint then only according to single ISO14083-compliant methodology
- **UIRR AMENDMENT**: should be mandatory for all types of transport-chains
- ADDITIONALLY: (mandatory) labelling of transport chains









POSITION PAPER

CountEmissionsEU Regulation must be mandatory

Measuring comparable greenhouse gas and other externality parameters of actual transport chains, using a standard methodology, is a powerful decision-making aid. The carbon footprint of a particular transport chain is determined by the actual weight of the cargo transported, the type of the transport technology(les) and the various types of energy or fuel used, as well as by the concrete routing including its geography. The calculation based on actual variables provides an accurate indication of the carbon footprint and is therefore endorsed by the European Combined

The architecture proposed by the European Commission is lean, it does not impose any administrative burden and it produces eye-opening results that will materially support shippers and consignors in making decisions on the

- The ISO14083 standard1 is a global standard adopted in March 2023 – it establishes a thorough well-to-wheel measurement of carbon footprint.
- The eFTI Regulation a defines a new digitised communication standard between businesses and authorities that will collect all the information needed for the CountEmissionEU calculation to be carried out as an algorithm; the Regulation will enter into force by the end of
- The CSR Directive 3 , which requires the disclosure of CO $_2$ emissions of all major operations of every major economic actor entered into force on 5 January 2023.



Although the architecture of the CountEmissionsEU is robust, it inexplicably prescribes a voluntary opt-in, while

CountEmissionsEU should become mandatory at least for those transport chains, where

Many actors in freight transport are SMEs, which regularly subcontract to the larger shippers and consignors, and as such have a great impact on ultimate outcomes. The eFTI Regulation will make the use of CountEmissionsEU an automatism, without imposing any administrative burden, therefore the SME-exclusion is not justified.

- * ISO14,483: Greenhouse gases Quantification and reporting of greenhouse gas emissions arising from transport chain operations *Regulation 2020/1096: https://eur-les-europa-euleral_content/EN/TXT/Am-CELEXIA-1202083-0058-004-2-50320
- 3 Directive 2022/2464; https://eur-lex-europa-eullegal-content/EN/TXTPuri-CELEX-120221-2464

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Greening Freight Transport Package: Combined Transport Directive amendment



New defintion: a fact-based calculator of the external cost impact of a door-to-door Combined Transport operation replace the current 'literary definition' expressing a value in percentage of the unimodal road-only alternative; Combined Transport is from a 40% externality saving

Initial assessment

- Explicitly and quantifiably recognising the externality advantage of door-to-door Combined Transport over long-distance unimodal truck transport,
- Requiring Member States to draw up a strategic freight transport plan and within it a chapter specifying the objectives to be achieved through Combined Transport,
- Mandating the implementation of a mix of support measures that result in at least a 10% reduction in the operating costs of Combined Transport.
- Extending the qualification of Combined Transport to also include purely domestic operations.
- **UIRR Position Paper:** to be published soon



POSITION PAPER

DD November 2027

Combined Transport Directive amendment: a necessary modernisation

The European Commission's proposal to amend the Combined Transport Directive, published on 7 November, is the fourth and final component of the Greening Freight Transport Package of legislative initiatives on transport. The proposal has been highly anticipated by the users of rail freight transport, and as such Combined Transport Operators Combined Transport – a creation of European law:

- Multimodal freight transport is based on the cooperation of several modes of transport to perform a single transport operation that has a superior overall outcome from a total cost/total impact perspective, including externalities that are not reflected in the price to be paid by the customer.
- Intermodal freight transport is a freight subset of multimodal transport, during which the cargo carried in the transport operation is contained from start to finish in a single intermodal loading unit (I(LU) – a container, a swap body or a semi-trailer. The use of an intermodal loading unit (ILU) enables the use of intermodal transhipment techniques which provide the fastest, most efficient and the safest shifting of cargo between
- Combined Transport is a category of intermodal freight transport, which was created by a definition contained in European Union law known as the Combined Transport Directive. The definition of Combined Transport refers to those intermodal freight transport operations that maximise the desirable total cost/total impact door-to-door performance when compared to the unimodal trucking alternative.

The definition of Combined Transport

The definition contained in the current text of the Combined Transport Directive from 1992 has been criticised from

- Ambiguity: what makes a terminal used in a Combined Transport operation the "nearest suitable"? Who is to make this designation? These deficiencies in the definition have been severely criticised.
- Enforcement: the ambiguity of the definition has resulted in a multitude of disputes during roadside police enforcement actions in several Member States, sometimes leading to severe disruptions to transport chains, legal disputes and fines. Problematic enforcement has ultimately undermined the good standing of
- Single solution: while Combined Transport is a freely competing form of freight transport, the definition based on the use of the "nearest suitable terminal" means that, in theory, only one single Combined Transport service could be used, since there can only be a single terminal that is the "nearest suitable".

UIRR recognises the importance to include a definition of both an intermodal transport operation and a

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Zero-carbon door-to-door transport is feasible already today!



