



SILK ROAD SUMMIT 2023

# CONNECTING TO THE EUROPEAN NETWORK

# UIRR, the industry association of Combined Transport



## PARTNERS

## MOU PEERS



## UIRR OPERATORS

## UIRR TERMINALS

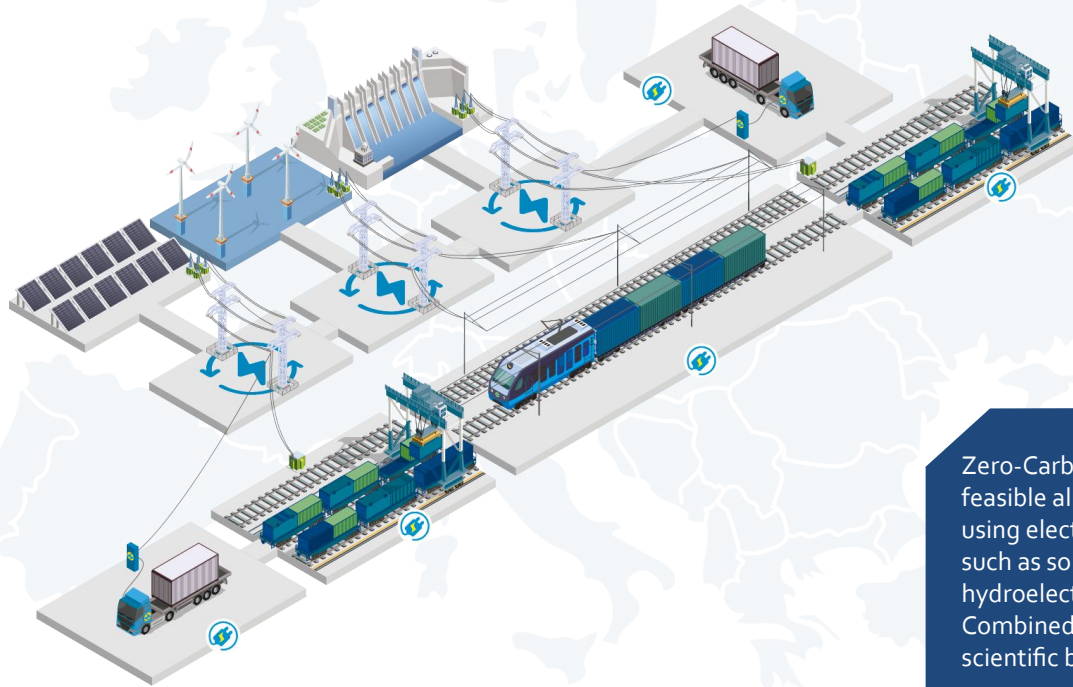


## INDUSTRY ASSOCIATION PEERS

## GOVERNMENTAL BODIES



# Zero-Carbon Combined Transport: the future in Europe



Zero-Carbon Combined Transport is feasible already in 2021\* through directly using electricity from renewable sources such as solar powerplants, windmills and hydroelectric plants. Zero-Carbon Combined Transport does not require scientific breakthroughs.

# Intra-EU and intercontinental: shared objectives



EUROPE



ASIA

- **Regulatory alignment** - harmonised technical and administrative rules
- **Operational transparency** - real-time information
- **Harmonised political objectives** - climate, environmental, transportation
- **Interoperability** - infrastructure, IT systems, mobile assets, technical standards
- **Capacity coordination** - train paths and transshipment
- **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

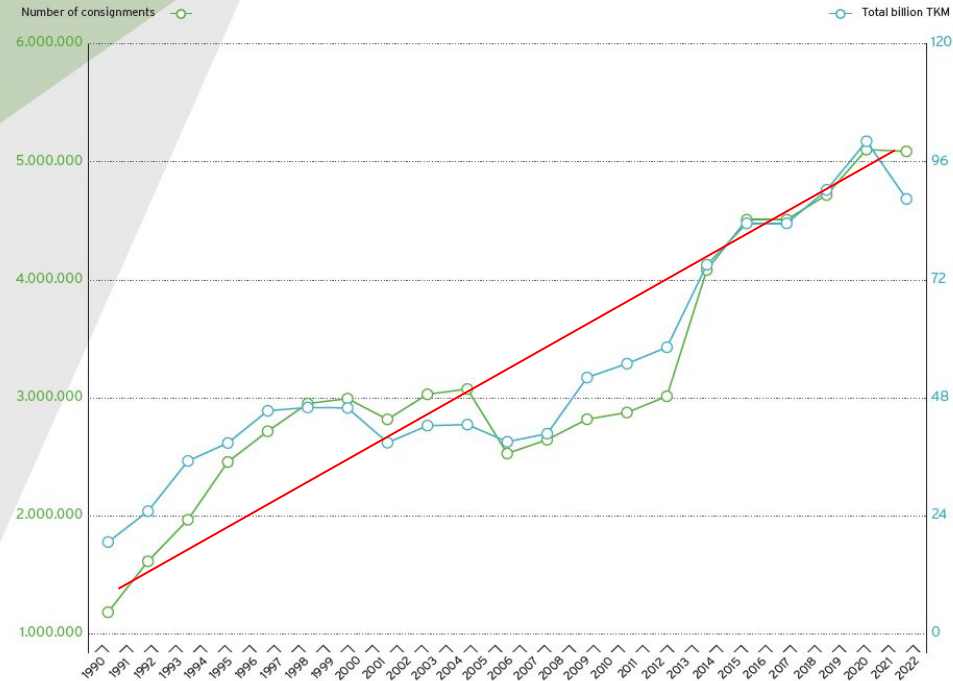
# Greening Freight Package: Europe's historic opportunity

- **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



## Evolution of Combined Transport Traffic

1990 - 2022



# 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



# Greening Freight Transport Package: Rail Infrastructure Capacity Management Regulation



## ■ Complicated new structure:

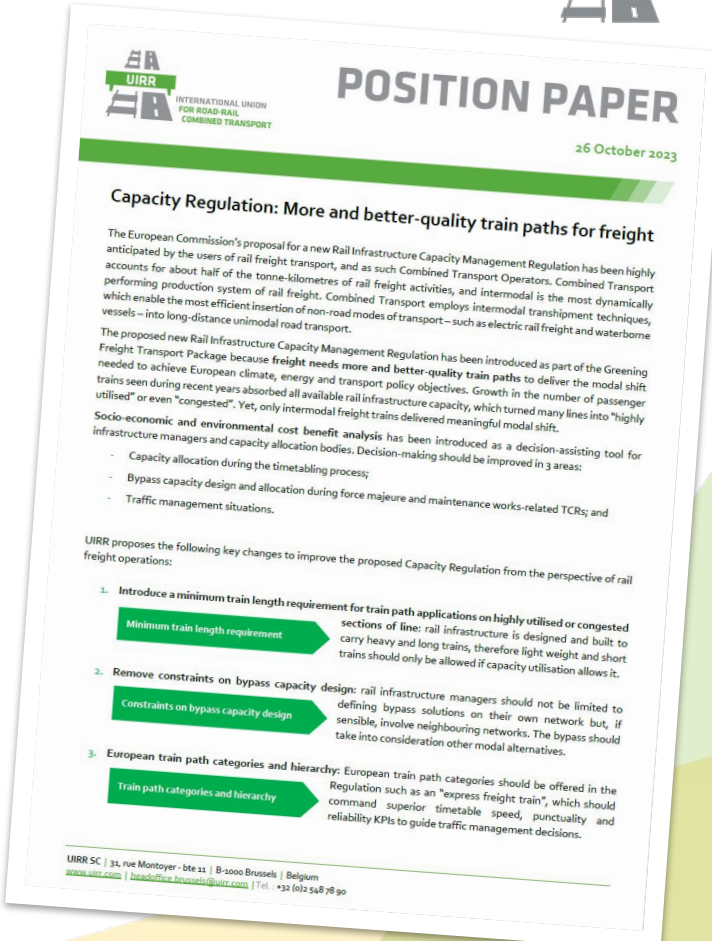
- ENIM + Network Coordinator
- ENRRB (regulatory oversight)
- Review Board (to assist COM)

## ■ 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 guide traffic management
- Minimum train length on “highly utilised”/“congested” lines: ? 200m-long trains
- Remove modal and network constraints from TCR bypass capacity 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 ginaliners 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/ginaliners – 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)
  - *ginaliner* 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



# 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



**INTERNATIONAL STANDARD ISO 14083**

First edition 2023-05

**Greenhouse gases — Quantification and reporting of greenhouse gas emissions arising from transport chain operations**

*Gaz à effet de serre — Quantification et déclaration des émissions de gaz à effet de serre résultant des opérations des chaînes de transport*

**UIRR** INTERNATIONAL UNION FOR ROAD-RAIL COMBINED TRANSPORT

## POSITION PAPER

24 October 2023

### 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(ies) 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 Transport sector.

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 transport chain that is ideal for their needs.

- The ISO14083 standard<sup>1</sup> is a global standard adopted in March 2023 – it establishes a thorough well-to-wheel measurement of carbon footprint.
- The eFTI Regulation<sup>2</sup> 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 2024.
- The CSR Directive<sup>3</sup>, which requires the disclosure of CO2 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 excluding SMEs or small and medium size companies:

**VOLUNTARY OPT-IN** CountEmissionsEU should become mandatory at least for those transport chains, where an alternative for inland freight transport exists.

**EXCLUSION OF SMEs** 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.

**CountEmissionEU** **ISO 14083**

**ELECTRONIC FREIGHT TRANSPORT INFORMATION REGULATION (eFTI)**

**Corporate Sustainability Reporting Directive (CSRD)**

<sup>1</sup> ISO14083: Greenhouse gases – Quantification and reporting of greenhouse gas emissions arising from transport chain operations  
<sup>2</sup> Regulation 2020/1056: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020R1056&id=32020R1056>  
<sup>3</sup> Directive 2022/2464: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022L2464>

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# Greening Freight Transport Package: Combined Transport Directive amendment



- **New definition:** 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



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





THANK YOU  
For your attention