

Combined transport operation: a new definition

The European intermodal freight transportation sector proposes to simplify the definition of combined transport operation in the Combined Transport Directive, while keeping the underlying logic of its external cost advantage when compared to the unimodal road alternative. The solution is to transform the external costs into an easy to understand, easy to use, easy to model distance-based definition¹:

➤ ***Combined transport operation: an intermodal transport operation where the non-road modes of transport carry out more than 50% of the actual distance that the intermodal loading unit is carried. The 50% should change to 60% in 2035 reflecting the anticipated enhancements in terminal density and rail infrastructure development.***

The European Commission proposed to replace the current definition of combined transport operation as contained in the Combined Transport Directive today. A calculator was defined that designates those intermodal freight transport operations as combined transport, which save at least 40% of the external costs of the unimodal road alternative. The sector asks for a simpler definition. The conversion is described in the UIRR position paper published today¹.

Considering that both the intermodal transshipment terminal capacities and the European railway infrastructure are under a major development, while the Weights and Dimensions Directive would allow the circulation of vehicle combinations powered by an internal combustion propelled tractor unit until 2035, the intermodal sector proposes to begin with an at-least 50% non-road to a less-than-50% road-leg regime that would convert to the 60:40 ratio in 2035.

By adopting the proposed formula, the combined transport designation would be extended by the same ratio to additional intermodal freight transport operations as identified in the European Commission impact assessment. At the same time the definition would be easier to understand, to use in modelling of services, to certify towards the authorities, and to verify during enforcement actions.

Should the eFTI platforms not be available in every Member State until the foreseen CTD implementation deadline, a deferred implementation of the new definition of “combined transport operation” is proposed by the Commission until such eFTI platforms are in place and widely accessible to every intermodal actor. The concept of deferred implementation should be extended with the adoption of the implementing acts of the amended Directive.



“Removing uncertainties and unnecessary complexity, while maintaining the principle of external cost advantage was the objective of the intermodal sector when devising its recommendation on how to improve the definition of combined transport operation.” – explained UIRR President Ralf-Charley Schultze.

Who is UIRR?

Founded in 1970, the **International Union for Road-Rail Combined Transport (UIRR)** represents the interests of European road-rail Combined Transport Operators and Transshipment Terminal Managers. Road-Rail Combined Transport (CT) is a system of freight forwarding which is based on efficiently and economically inserting electric rail into long-distance (road) transport-chains through the use of intermodal loading units (ILU).

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¹ <https://www.uirr.com/en/component/downloads/downloads/1837.html>