

## Reclassification of CT road-legs should not be accepted

UIRR calls on the TRAN Committee of the European Parliament not to accept the triologue deal concerning Regulation 1072/2009. A second reading of the proposal should take place instead, during which the provision in question can be replaced with alternative regulatory measures that can equally achieve the underlying policy aim behind the new paragraph added to Article 10 of regulation 1072/2009<sup>1</sup>.

The triologue deal on Mobility Package 1, namely the Access to the Road Haulage Market Regulation (1072/2009), contains a provision<sup>1</sup> that if applied could severely impact existing Combined Transport (CT) services, and impede the development of new Combined Transport services in the future.

The European intermodal sector has extensively highlighted during the process of the ongoing amendment of the Combined Transport Directive 92/106/EEC that the legal equivalence between an end-to-end border crossing road haulage operation and its corresponding cross-border Combined Transport operation must be upheld.

Combined Transport is the most widely used industrialized technical solution that enables the most efficient and economic insertion of non-road modes of transport, such as electric railways or waterborne vessels into cross-border transport chains. CT is instrumental in diverting the cargo presently carried in long-distance trucks to ecologically much more sustainable, low carbon-footprint transport solutions. This positions CT as a direct competitor of long-distance trucks in the freight haulage marketplace. The competition of the two should take place on an equal footing.

Article 4 of the CT Directive has become a mainstay of cross-border CT chains over the 28 years that it has been in existence. There is no reason for diverting from it now, especially not without careful examination of the impact of such a measure. Consideration ought to have been made to the

- **Climate impact:** the European Green Deal<sup>2</sup>, which aims to decarbonize the EU, and the Climate Emergency<sup>3</sup> declaration of the European Parliament of 29 November 2019 both require more Combined Transport.
- **Environmental externality impact:** the extensive external costs of road transport – uncovered in the revised Handbook on the external costs of transport<sup>4</sup> – can only be reined in through more Combined Transport.
- **Economic impact:** seamless logistics chains – essential to the competitiveness of the EU economy – can only be guaranteed, considering the imminent shortage of truck drivers, by more Combined Transport.

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<sup>1</sup> new paragraph 7 added to Article 10 whereby Member States would be allowed to unilaterally suspend the application of Article 4 of Directive 92/106/EEC and require compliance of road legs of international CT-chains with cabotage rules

<sup>2</sup> [https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal\\_en](https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_en)

<sup>3</sup> <https://www.europarl.europa.eu/news/en/press-room/20191121IPR67110/the-european-parliament-declares-climate-emergency>

<sup>4</sup> <https://ec.europa.eu/transport/sites/transport/files/studies/internalisation-handbook-isbn-978-92-79-96917-1.pdf>



Ralf-Charley Schultze

*"The Members of the European Parliament, who voted for the Climate Emergency Declaration on 29 November 2019 should recognise that the proposed triologue deal that they will vote on tomorrow, 21 January, entirely contradicts their and the voters' preferences. The proposed deal should be rejected allowing the legislative process to continue in a second reading to find a suitable solution to achieve the desired policy aims." - stated 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 Transhipment 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).