



INTERNATIONAL UNION
FOR ROAD-RAIL
COMBINED TRANSPORT

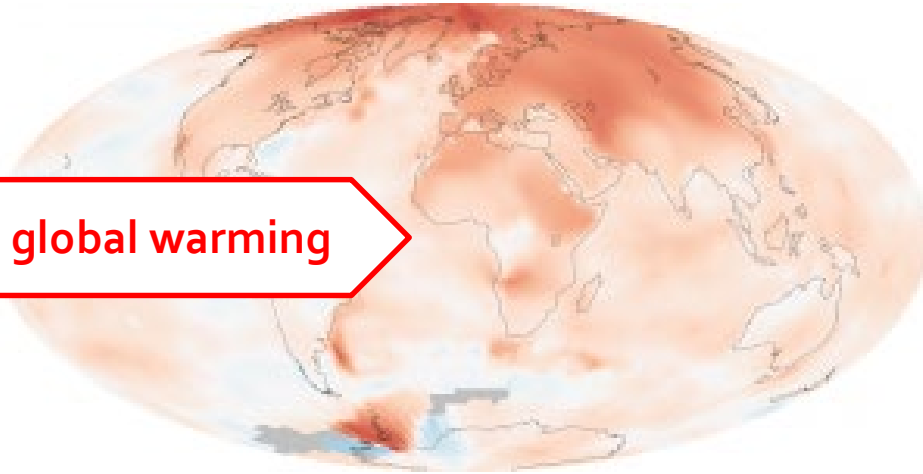
ChemMultimodal Project Advisory Group Meeting

AMENDMENT OF THE CT DIRECTIVE - STATUS REPORT

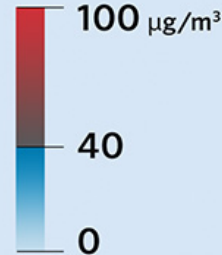


Ákos ÉRSEK
Chief Policy Advisor

global warming



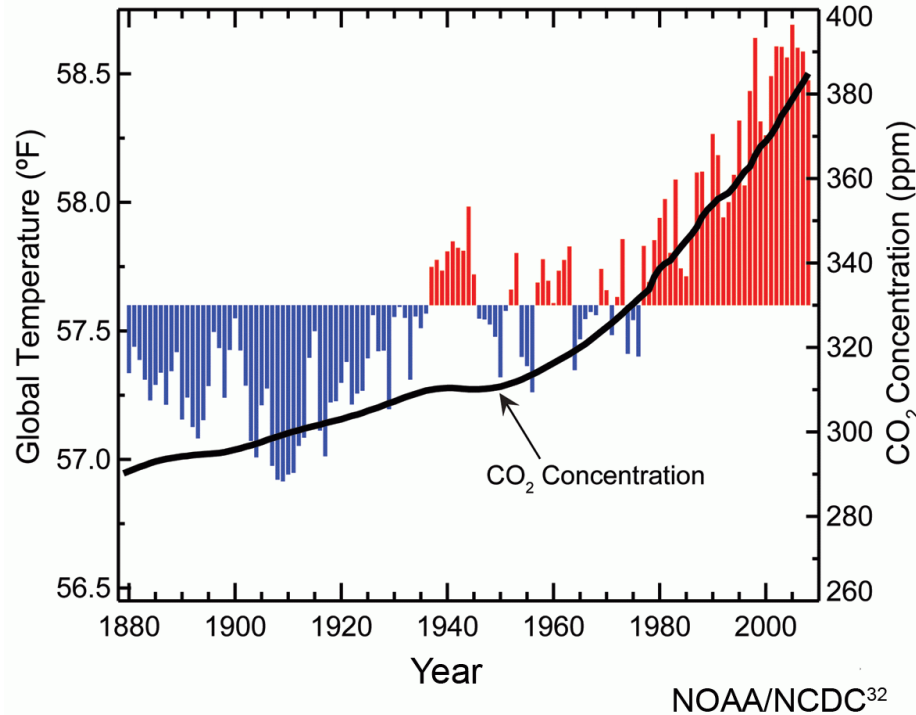
NO₂ levels, 2013



air pollution



traffic congestion





Rail
(15.6 gCO₂/tkm)



Inland waterways
(50.62 gCO₂/tkm)



Road
(139.8 gCO₂/tkm)



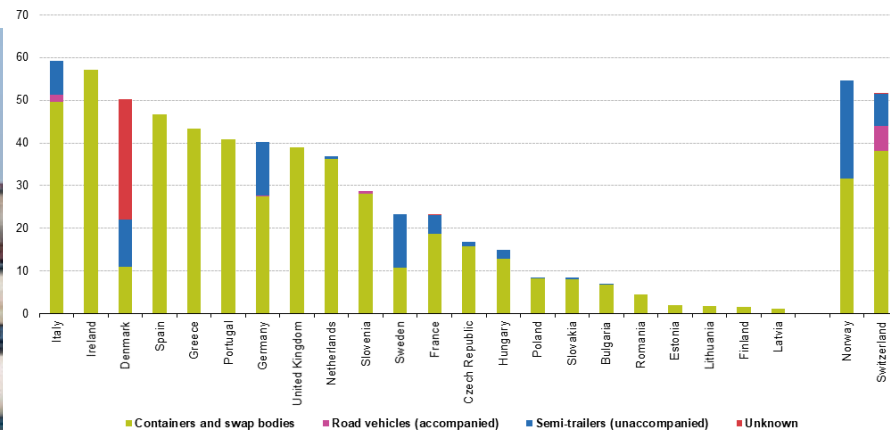
- Two dimensions instead of one:



- Convenient temporary (buffer) storage:



Share of intermodal transport units in rail goods transport, 2016
(% of total tonne-kilometres)

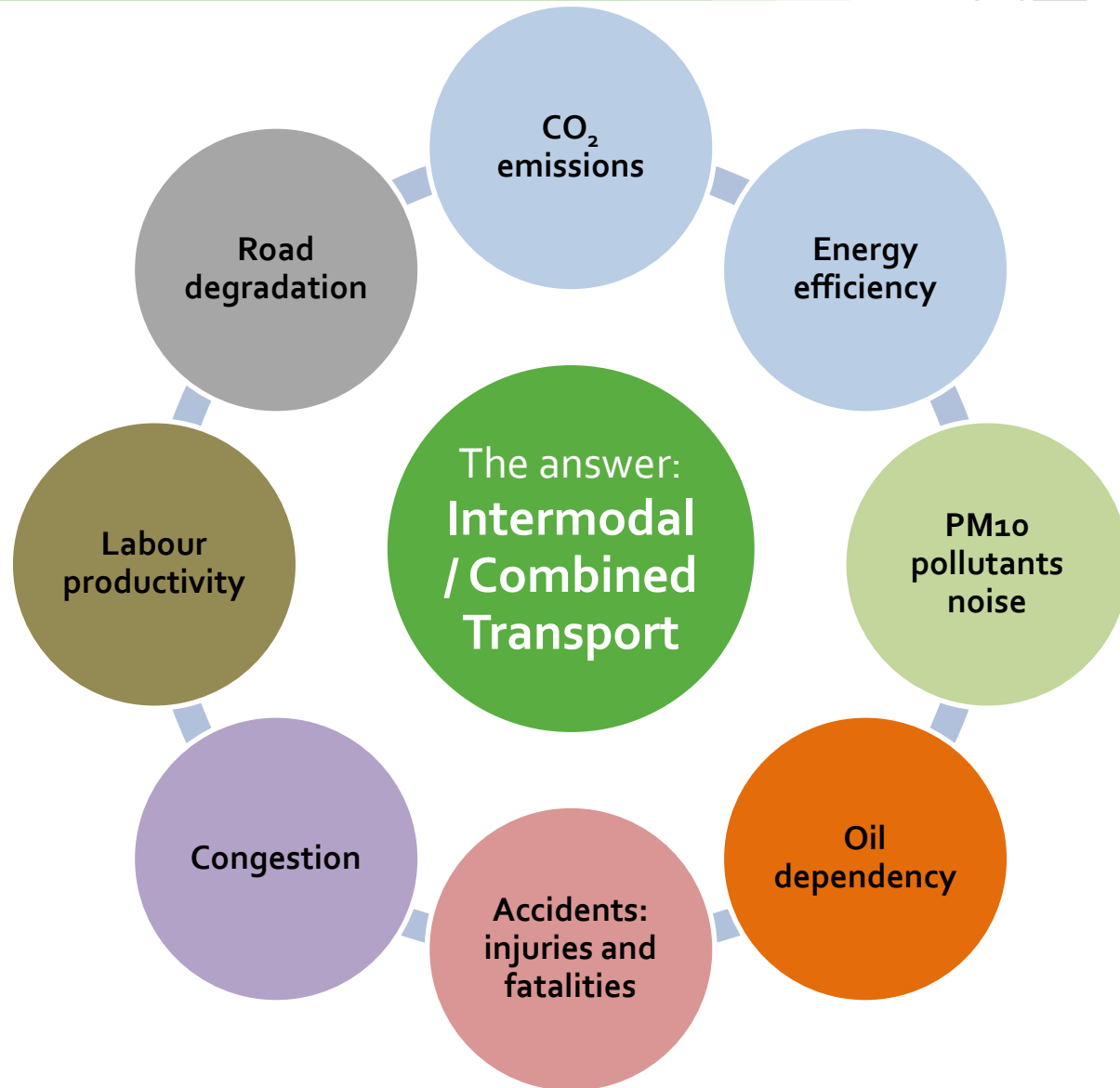


Note: Based on gross-gross weight, including both the weight of packaging and the tare weight of the containers. Belgium, Luxembourg and Austria: not available; Cyprus, Malta and Iceland have no railways, while Liechtenstein's railway line is negligible.
Source: Eurostat (online data code: tran_im_rail)

Combined Transport: the solution to the challenges



- **Climate:** CO₂/ energy efficiency
- **Environment:** air and noise pollution, vibration
- **Congestion:** to prevent GDP losses
- **Public security:** oil dependency
- **Safety:** accident injuries/fatalities and material losses
- **Employment:** labour productivity
- **Infrastructure:** road degradation and spatial constraints



Public consciousness: on the increase – leads to impetus for internalisation

- CO₂ emissions
- Local air pollution (NO_x, O₃, PM₁₀)
- Oil dependency
- Noise
- Congestion
- Accidents
- Bio-diversity
- Land use



Public consciousness: the time to act is here – as agreed to by the OECD transport ministers on 1 June 2017

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Scope

*combined transport extended to **domestic operations** + improved definition will cover **70% of intermodal movements***

Enforcement

*modernised to **reduce disturbance** to transport flows and make **cheaper to fulfill***

Directive 92/106

State aid

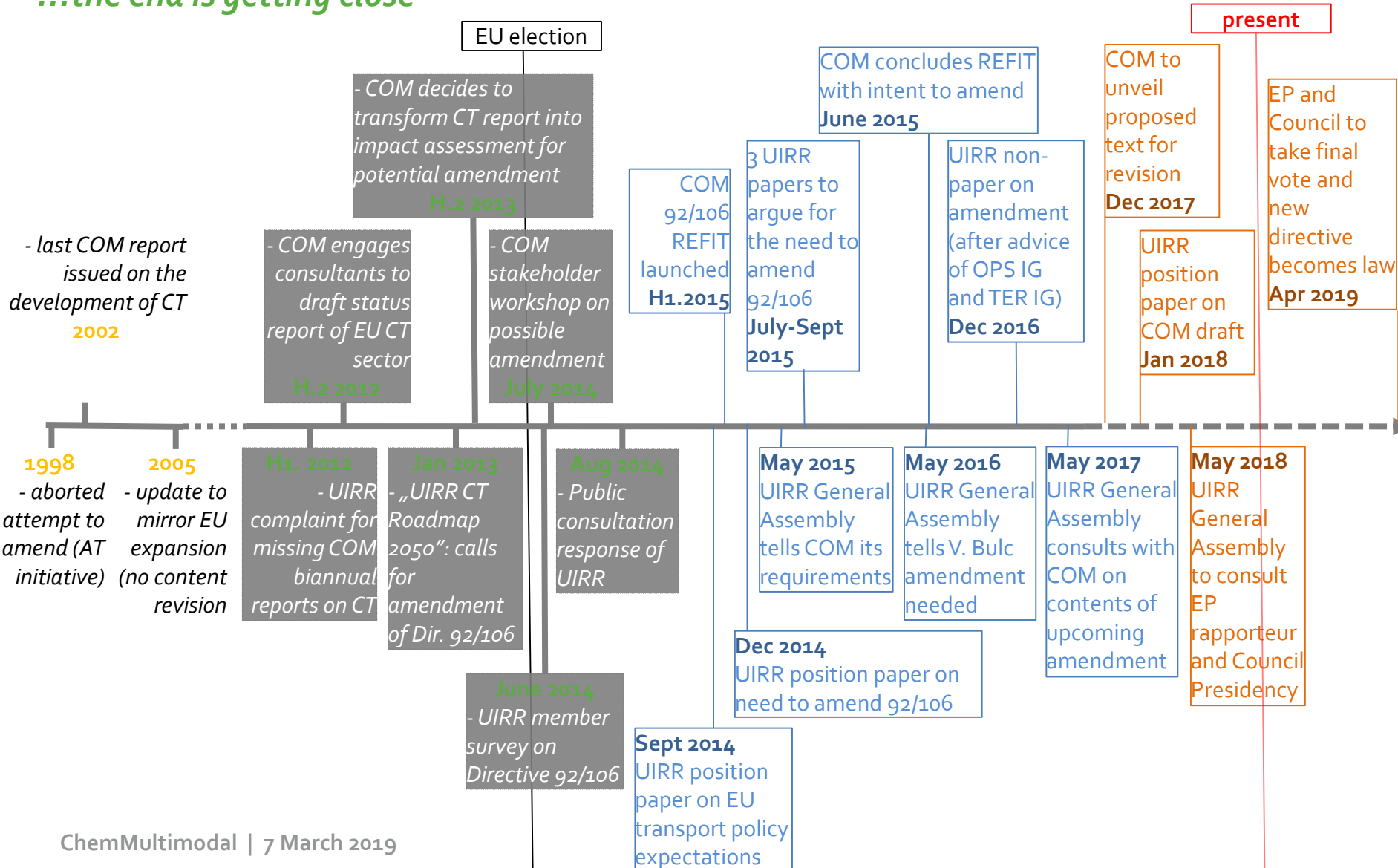
*to assist **terminal development** and to **temporarily compensate** regulatory disparities*

Reporting and monitoring

*to **better inform** policy-makers and the stakeholders of intermodal transport*



...the end is getting close





Proposed amendment unveiled in November 2017



European Parliament

European Parliament position was adopted in July 2018



**Council of the
European Union**

Council general approach agreed in December 2018



positives

- **Road legs:** 150km fixed distance ‘as the crow flies’ reduces bureaucracy while opens the choice of terminals in the case of 3 out of 4 road legs.
- **Exceeding the 150km distance:** a prerogative of the organizer of the combined transport operation (justification has to be provided)
- **Terminal suitability:** a detailed description is given as to what makes a terminal ‘suitable’ for the case when the maximum allowed fixed distance (150km) needs to be exceeded
- **A clear description of evidence:** documentation to prove a particular combined transport operation is described, including the possibility to contact a dispatcher within the scope of the roadside check, to eliminate uncertainties and to help enhance the efficiency of enforcement
- **Legal equivalence of cross-border combined transport and international road haulage (Article 4):** the principle rule enshrined in Article 4 of 92/106 is upheld.
- **State aid:** an obligation is defined to ‘encourage investment into’ the development of transshipment terminals (where needed), as well the obligation is made to ‘introduce at least one operational support measure’ (where a non-exhaustive list of possible monetary and non-financial state aid measures has been added)

negatives

- **Scope:** remains limited to cross-border combined transport operations only
- **Terminal suitability:** based on the criteria provided in the Directive, Member States may assess the suitability of terminals on their territory and publish a list thereof.
- **Evidence:** more extensive documentation will be required than produced today by most combined transport operators – especially in case of road legs longer than 150km (‘as the crow flies’).
- **Possibility to curtail Article 4 privileges:** a temporary regulatory tool is created which Member States may choose to apply in order to avert perceived disturbances to their national road haulage markets, while assessing impact on combined transport operations, whereby cabotage restrictions may be applied to combined transport road legs on their territory (transparently – with justification, 3-month preliminary consultation, 2-yearly review of impact)
- **Limiting operational state aid:** Member States may withhold operational state aid measures (defined in Article 6 of the Directive) from those combined transport operations of which only the road leg takes place on their territory



...if anything more is reduced from the Romanian Compromise Proposal

- ✓ fewer European rules – delegating rule-setting to MS governments
- ✓ further compromised legal equivalence of combined transport with road haulage
- ✓ no commitment to provide temporary compensatory measures
- ✓ weakened transparency through reduced reporting

The sector will be bound to request that the Commission abort the amendment process by withdrawing the entire dossier.

In this case:

- ✓ complaints will be filed by combined transport actors on defective MS implementation and enforcement practices
- ✓ Commission is bound to launch infringement proceedings

...and daily battles will ensue.



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THANK YOU

For your attention

