



## ECTA-UIRR Joint Position Paper

### on the use of zero-emission trucks for the pre- and on-carriage in combined transport operations

#### in view of the revision of the Combined Transport Directive

Combined Transport is a form of intermodal transport in which one mode of transport (e.g. rail, ship or inland waterway) is used in addition to minimising the distance of the road leg within the transport chain. This form of freight transport reduces greenhouse gas (GHG) emissions drastically and is therefore an important mean to further decarbonise freight transport.

The combination of different modes of transport can enhance each other, help reducing freight emissions in a complementary way, while boosting energy efficiency and enabling modal optimisation in freight transport. Therefore, the revision of the Combined Transport Directive gives the opportunity to the European Clean Trucking Alliance (ECTA) and the International Union for Road-Rail Combined Transport (UIRR) to jointly highlight that zero-emission trucks (ZETs) can deliver concrete benefits when used in the road-leg part of combined transport operations, and that additional measures should be considered to incentivise their use within combined transport operations.

- Key message 1: zero-emission trucks are the ideal road technology to perform the road leg part of combined transport operations without climate emissions and are an enabler of zero-carbon door-to-door combined transport.
- Key message 2: To support the deployment of ZETs in combined transport operations, charging points should be installed at intermodal freight terminals.
- Key message 3: Additional measures should be taken to incentivise the use of zero-emission trucks in combined transport.
- Key message 4: Change of legal instrument to a Regulation is needed to ensure a uniform understanding and application of the Combined Transport Directive throughout the EU

#### 1. Zero-emission trucking is the key to decarbonizing the road leg of combined transport

While the uptake of the zero-emission road freight transport should be further incentivised including with ambitious CO<sub>2</sub> reduction targets for new trucks<sup>1</sup>, revising the Weights and Dimension Directive

<sup>1</sup> See also ECTA's reaction paper on the CO<sub>2</sub> standards for heavy-duty vehicles at <https://clean-trucking.eu/publications/reaction-paper-to-the-commissions-proposal-for-a-revision-of-the-co2-standards-for-heavy-duty-vehicles/>

and the rapid implementation of the Regulation on Alternative Fuels Infrastructure, it should also be accompanied by additional measures which can further reduce the carbon footprint of inland freight transport in the coming decade and where zero-emission trucks have a role to play.

With a range of up to 300 km for battery-electric vehicles entering the EU market today and 500 km reach by 2024, zero-emission trucks represent an ideal alternative to fossil-powered vehicles: they cut emissions from the road leg part and can carry out similar operations: up to 95% of CO<sub>2</sub> emissions can be saved in combination rail-road with an electric truck and a train powered by renewable electricity<sup>2</sup>. Hence, where possible the road legs of journeys can be extended for ZETs to incentivise the uptake of those clean vehicles.

We support measures which are technologically and economically viable to reduce the carbon footprint of inland freight transport in the coming decade. The use of zero-emission trucks for the road leg part of zero-carbon door-to-door combined transport operations should therefore be incentivised and their connectivity to other legs furthered as part of the revision of the Combined Transport Directive.

## **2. Intermodal freight terminals should be equipped with (semi-)public DC opportunity charging stations for battery-electric trucks**

Intermodal freight terminals serve as nodes for four transport modes (maritime, rail, road and inland waterways) and fulfil an important role in providing intermodal transport solutions. Their infrastructure, efficiency and availability, including the upgrading and optimisation of existing facilities and services, should be strengthened.

Zero-emission trucks will also need to charge near freight terminals. To allow for their seamless use in combined transport and further support the decarbonisation of road freight transport, it is crucial that freight terminal areas are equipped with (semi-) public DC opportunity charging points at each of the logistic hubs and freight terminals by 2025, with sufficient power output (of at least 700 kW and 150 kW for overnight charging) to charge rapidly trucks during loading/unloading operations<sup>3</sup>.

## **3. Additional measures should be taken to further incentivise the use of zero-emission trucks in combined transport**

To further promote intermodal transport operations with zero-emission trucks, the initial and final leg of the transport operation done by zero-emission trucks should be exempted from traffic bans, e.g. driving bans during weekends and holidays, so as to fully use the potential of intermodal transport and the advantages of zero-emission trucking.

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<sup>2</sup> See Contargo's sustainability report 2022 (page 74) at <https://www.contargo.net/assets/pdf/infodownload/publications/NHB-2022-EN.pdf>

<sup>3</sup> See also ECTA's position on the revision of the Alternative Fuels Infrastructure Regulation (AFIR) at <https://clean-trucking.eu/publications/enable-seamless-cross-border-zero-emission-trucking-across-the-eu/>

Indirect financial support measures could also be introduced to help the use of zero-emission trucks in intermodal transport, for instance the application of a 75% toll discount for zero-emission trucks, as provided for under the 2022 revision of the Eurovignette Directive.

Moreover, it is necessary to implement Europe-wide rail coordination and a common EU legal framework for the use of trains and for the use of locomotive drivers between EU countries and not only on domestic services.

Finally, for the needed coordination flow between pre- and on-carriage and the train main run, the creation of pre-stations (or “sidings”) is important for increased productivity, so that for example late trains due to imprecise timetables can be parked and buffered in front of the combined transport terminals.

#### **4. Change of legal instrument to a Regulation is needed to ensure a uniform understanding and application of the Combined Transport Directive throughout the EU**

Diverging interpretations of legal provisions amongst Member States has led to a patchwork of national regulations on combined transport operations, hindering the smooth functioning of the Single Market, distorting the level playing field and imposing additional burdens on companies operating in the EU. The revision of the Combined Transport Directive gives a unique opportunity to address these malfunctions by changing the legal instrument, from a Directive to a clear, direct binding nature of a Regulation to further support harmonisation amongst Member States throughout the European Union.

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#### ***About the International Union for Road-Rail Combined Transport (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).*

#### ***About the European Clean Trucking Alliance (ECTA)***

*The European Clean Trucking Alliance is a coalition of over 35+ companies and organisations active in logistics, consumer goods, manufacturing, retail and supply chain management from across Europe calling for zero-emission road freight. For more information, please visit the website: [www.clean-trucking.eu](http://www.clean-trucking.eu)*