

Greening Freight Transport: protectionism or rebalancing?

UIRR, the industry association of European Combined Transport, examined the European Commission's **Greening Freight Transport Package** (GFTP) proposals and wonders of the underlying motivation: **does the Commission propose to protect the 76% market share of road transport, or is there an intention to rebalance the modal equilibrium in Europe?** The answer is difficult to give as the amendment proposal of the Combined Transport Directive is yet to be published. But based on the 3 known proposals, the package appears to be leaning towards protectionism, and not rebalancing.

UIRR sees a path that could make the Package more equitable, but this will require European co-legislators to first come clean with regards to their intentions. Only then can the necessary amendment be evaluated and inserted into the proposals. This is reflected in the GFTP position paper¹ published by UIRR today.

In its first proposal-specific position paper UIRR examines the Commission's proposed **amendment of the Weights and Dimensions Directive**² in detail. The proposed amendments will not deliver the declared objectives of enhancing (carbon- and energy-) efficiency of road haulage, and promoting intermodal freight transport, therefore the proposal should ideally be rejected and returned to the Commission.

Should the call for rejection not be followed, the minimum is to **keep together the 3 components of the Greening Freight Transport Package impacting road haulage**³ to compensate for some of the worst excesses⁴.

The most important points from an intermodal perspective are:

- a. The framework rules for the use of **gigaliners** (a.k.a. "European Modular System" trucks) should optimise these vehicles for short distance transport and for use in low population density areas where non-road modes are not available.
- b. **Interoperability** between the various modes of transport and **intermodal compatibility** should be fundamental principles to be upheld throughout the Directive, in case of every change to the weights and dimensions of trucks.
- c. The fragmentation of the regulatory framework of the Single European Transport Area will be accelerated if the amendments for more Member State discretion are allowed. This needs to be counterbalanced by the creation of a **European Freight Transport Information Portal** where every transport organiser or operator, including many SMEs, can find every applicable Member State rule and state aid measure.



Ralf-Charley Schultze

"Door-to-door Combined Transport is the effective, affordable and low-risk solution to achieve the EU's policy objectives. The Greening Freight Transport Package should reflect this and adopt changes for the affordable and effective solution, not the far second best." – cautioned UIRR President Ralf-Charley Schultze.

¹ <https://www.uirr.com/en/media-centre/press-releases-and-position-papers/2023/mediacentre/2680-position-paper-greening-freight-transport-package-.html>

² <https://www.uirr.com/en/media-centre/press-releases-and-position-papers/2023/mediacentre/2679-position-paper-amendment-of-weights-and-dimensions-directive.html>

³ The new CountEmissionEU Regulation and the Weights and Dimensions and Combined Transport Directive amendments

⁴ <http://uirr.com/en/media-centre/press-releases-and-position-papers/2023/mediacentre/2660-joint-press-release-the-greening-freight-transport-package-should-be-kept-together.html>



INTERNATIONAL UNION
FOR ROAD-RAIL
COMBINED TRANSPORT

PRESS RELEASE

Tuesday, 3 October 2023

The amendment creates the legal framework for the cross-border circulation of 44-tonne gross weight gigaliners, which would cement the present market position of trucks on the dominant long-distance low-density palletised cargo segment, preventing any modal shift away from road. All this at a time when door-to-door Combined Transport offers a multiple times favourable performance in every metric when compared to trucks. In the worst case even existing Combined Transport carriage of such assignments will revert back to road.

Insufficient and inadequate intermodal transport promotion measures, such as additional weight, additional height, gigaliners for road legs or 4 tonnes of additional batteries for electric trucks performing Combined Transport road legs are unnecessary and useless. The intermodal sector needs stability of weights and dimensions to boost investment confidence. In the United States of America the comparable weights and dimensions legislation has not been changed since 1984⁵.

* * *

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).

31, rue Montoyer - bte 11 | B-1000 | Brussels
www.uirr.com | headoffice.brussels@uirr.com
Tel. : +32 2 548 78 90

⁵ <https://www7.transportation.gov/testimony/truck-weights-and-lengths-assessing-impacts-existing-laws-and-regulations>