

## Europe needs connectivity through Combined Transport

Don't withdraw the Combined Transport Directive revision proposal - there is a solution!

The EU co-legislators are hereby encouraged to implement the changes to the Combined Transport Directive (92/106) proposed by UIRR and the Intermodal Community to transform it into an efficient framework legislation for Door-to-Door Combined Transport (D2DCT) as a mode of freight transport on its own right and the backbone of the transport system. D2DCT should be viewed as an effective tool to deliver on a range of transport policy objectives including competitiveness, resilience, energy, labour, infrastructure and environmental efficiency, military mobility, road accident prevention, fossil fuel decoupling, and road congestion reduction.

Every fourth tonne-kilometre of long-distance land freight transport is performed by Door-to-Door Combined Transport (D2DCT) that uses rail freight or inland barges already today. Adding maritime intermodal transport by coastal navigation and when supplying islands using short sea shipping vessels the ratio of D2DCT climbs even higher. Intercontinental commercial links by deep sea shipping is effectively supported by port hinterland Combined Transport to and from all major seaports. In performing these missions, **D2DCT is the only alternative to unimodal trucking.**

90% of the consignments carried by D2DCT today are part of a cross-border European supply chain. D2DCT, as a European freight transport service, is essential to enable the competitive functioning of the European Single Market and the supply of European citizens. This cross-border angle justifies the **need for a harmonised European regulatory framework**, much alike the unimodal road sector regulations on access to the profession (1071/2009) and access to the market (1072/2009) as recently amended by Regulation 2020/1055.

European transport policymakers recognised the need to develop this alternative to trucks already in the early 1970s when Europe encountered the *oil crises*. Minimising the road component of transport chains using non-road modes of transport, such as electrified rail freight and waterborne means made possible by efficient intermodal transhipment techniques, distinguishes D2DCT as the backbone of the transport system. D2DCT should therefore be recognised as a **mode of freight transport on its own right**.

**The modernised Combined Transport Directive should contain**

- **An updated, improved and simple definition** of *combined transport operation* and a new definition of *combined transport operator* that would support effective digitalised enforcement (eFTI) and reduce the administrative burden.
- **Harmonised framework rules** that place D2DCT on an equal competitive footing with cross-border trucking through a maintained equivalence clause (contained in Article 4 of the current CTD), as well as introduces an intermodal waybill and homogenised information provision obligations, while addressing some technical details to daily operations, like codification.
- **A study-based industrial policy requirement** to base promotional and compensatory measures for D2DCT on sound policy-objectives within each Member State, while ensuring discrimination-free access to every qualifying actor.
- **A toolbox of acceptable policy-measures** of both in-kind and financial nature to eliminate unnecessary bureaucratic authorisation procedures, while delivering a robust, reliable and effective impact on D2DCT.

### The UIRR Combined Transport Community calls on

- **The European Parliament** and every political group led by Rapporteur Flavio Tosi to declare their intention to provide the European Combined Transport Community with a modern harmonised European regulatory framework in the form of an updated and improved Combined Transport Directive;
- **The Council of the European Union**, consisting of the Member State governments, currently led by the Cyprus Presidency, to express their strong desire to agree on a set of up-to-date European framework rules on D2DCT as a crucial facilitator for the European Single Market in the form of an improved Combined Transport Directive; and
- **The European Commission**, whose 2026 Work Programme indicated the intention to withdraw the CTD amendment proposal of 2023, to listen to the Combined Transport Community calling for an updated and improved regulatory framework, as well as the EU co-legislators who wish to provide a better legislation and refrain from executing the withdrawal of its proposed revision.

**The first European framework legislation for Combined Transport dates back to 1975**, when the Directive 75/130/EEC was adopted to enable the emergence of D2DCT, this vital alternative to unimodal road haulage on the continent. The European Commission's current proposal to amend the Combined Transport Directive (CTD) was published on 7 November 2023. This revision would be the second to the original Combined Transport Directive 75/130/EEC after the one in 1992 (92/106/EEC). Two further attempts failed in 1998 and 2017.

The annex of this paper has been drawn up with a view on the exchanges of Member State representatives in the Council Land Transport Working Party throughout 2024 – under the Belgian and Hungarian Presidencies – as well as on the discussions with members of the European Parliament Transport Committee, including with the rapporteur and shadow rapporteurs. It also reflects on the two papers issued by UIRR<sup>1</sup> upon the adoption of the Commission's revision proposal in 2023 and the recently published EP study on Combined Transport.

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<sup>1</sup> <https://www.uirr.com/press-releases-position-papers/position-paper-ct-directive-necessary-modernisation-preconditions> and <https://www.uirr.com/press-releases-position-papers/position-paper-definition-combined-transport-operation>

## ANNEX: technical details to the EU co-legislators

### Door-to-Door Combined Transport as a mode of transport in its own right

Combined Transport is the only door-to-door freight transport alternative to unimodal trucking. European transport policymakers recognised the need to develop this alternative in the early 1970s when encountering the *oil crises*. Minimising the road component using non-road modes, such as electrified rail freight and waterborne means distinguishes Door-to-Door Combined Transport (D2DCT), which should be recognised as a **mode of freight transport on its own right**. This recognition should continue to be expressed in European law.

D2DCT should be a mode of transport on its own right based on the following attributes when viewed from the perspective of unimodal trucking:

1. **Energy efficiency** of average D2DCT is 70% higher today, with an upside potential the longer the non-road leg is.
2. **Fossil-fuel decoupling** which may be 100% in case electric rail freight, electric transhipment and electric trucks are used for the CT transport-chain (a.k.a. Zero-Carbon Door-to-Door Combined Transport).
3. **Infrastructure efficiency** as D2DCT minimises the degradation of Europe's abused road network by using the rail and waterway infrastructure for the longest sections, both of which are ideal for heavy cargo.
4. **Safety efficiency** attributable to replacing the longest road segments with modes that are up-to 10-times as safe such as rail freight and waterborne.
5. **Reduction of road congestion** that may be caused by excessive maintenance works (due to the increased circulation of heavy trucks) or road accidents (which are extra severe if involving a heavy goods vehicle).
6. **Labour efficiency** meaning that jobs in D2DCT are 60% more productive, while offering a superior work/life balance compared to jobs in unimodal long-distance road haulage – thereby also contributing to the reduction of the truck driver shortage. D2DCT's labour efficiency has a significant upside potential as 740-meter-long freight trains become the norm and as the timetable speed of freight trains increases.
7. **Environmental efficiency** meaning fewer harmful emissions and less noise pollution thanks to the replacement of long-distance trucking with electric rail freight or efficient waterborne vessels.

### Suggested changes to the European Commission proposal of November 2023

The amendment proposals listed below would simplify the original Commission proposal, while allowing an effective improvement of Member State enforcement actions.

- A. **Definition of *combined transport operations*** [Article 9a]: every door-to-door intermodal freight transport operation should be defined as a combined transport operation, where the non-road leg reaches 60% of the total distance covered. Special rules to this:
  - a. **Domestic D2DCT** conducted entirely on the territory of a single Member State should be included as large Member States of the European Union, such as France, Germany, Italy, Poland, Spain or Sweden, offer plenty of opportunities for domestic combined transport operations.
  - b. **Periphery exemption** should enable Member States to authorise road-legs of D2DCT to be longer than 40% of the total distance in regions with inadequate terminal density.
  - c. **Island exemption** should allow island supply-chains to be designated a combined transport operation in case the road leg on the continent does not exceed 300km.
  - d. **Nature exemption** should allow Member States to set a limited maximum allowed road leg in regions of heightened environmental protection such as terrestrial Natura 2000 areas.

- B. The inclusion of **empty container transport** to/from container depots in the definition of combined transport operations is a very positive element (Article 1c). It recognises the operational needs of container management in a combined transport operation.
- C. The continuity of the **equal treatment of international combined transport and international road transport** regarding the use of non-resident hauliers (Article 4) is necessary
- D. The additional **information disclosure requirements proposed towards intermodal transhipment terminals** should be eliminated on grounds of reducing administrative obligations on small and medium size entities, since terminals are typically operated by SMEs.
- E. **Objective for Member States** [Article 3a paragraph 1] should be based on D2DCT offering a superior remedy to the adverse byproducts of long-distance unimodal truck transport as well as the advantages listed on page 1 of this paper. Member States should also take into account the considerations of Military Mobility, when deciding on the degree they wish to develop D2DCT on their territories since D2DCT integrates most efficiently rail freight into military transports. Member States should be obliged to draw up a policy plan to quantify the various policy objectives they wish to achieve through having more D2DCT.
- F. Framework rules defining D2DCT as a mode of freight transport on its own right:
  - a. **Marking of intermodal loading units** carried in a Combined Transport operation in accordance with ISO6346 or EN13044 should be part of the definition of an intermodal transport operation and should only address the marking related to the owner identification. The reference should be to EN13044 part 1 only. Further evidence should be presented on the necessity to impose such standardised owner identification for non craneable semi-trailers carried in an intermodal transport operation.
  - b. **Definition of codification entities** for intermodal loading units.
  - c. **Definition of Combined Transport Operator** is needed as an entity in charge of dual-use infrastructure such as intermodal wagons or vessels that can carry intermodal loading units usable in military transports.
  - d. **Declare D2DCT as a standard methodology for REPowerEU energy certificates** if a shipper shifts the transport of quantities of cargo from unimodal trucking to D2DCT.
  - e. **Authorise D2DCT as a solution for emission certificate issuance** under the ETS2 scheme.
  - f. **A single internet information portal** managed by the European Commission should contain the support measures, the exemptions and various other implementing rules of the Member States that are notified to the European Commission is welcome as it will provide the much sought-after access to Member State specific "national rules". The single portal should ideally be the same as the one required in the Weights and Dimensions Directive for Heavy Commercial Road Vehicles.
  - g. **The Authority in Charge of Combined Transport** should be designated within each Member State. The Authority and its contact details should be indicated on the single internet portal.
  - h. **Introduction of an intermodal waybill** including its contents and the entity in charge of producing it would be needed to facilitate the implementation of the eFTI Regulation.
  - i. **Digital wagon and ILU registers** should be prescribed to assist with efficient operations, including automated load planning of intermodal freight trains and waterborne vessels.

G. Acceptable compensatory measures with an aim to accelerate the achievement of D2DCT objectives as leaving the design of support measures up to the Member States will maintain the present fragmented and incoherent regulatory framework of D2DCT.

- a. **Support measures for new D2DCT services** should not be allowed to cannibalise existing D2DCT services on similar relations pursuant to the poor experiences with the Marco Polo Programme.
- b. **The drive-ban exemption** (Article 9a) of road legs performed as part of a D2DCT operation helps with terminal management through enabling continuous road-side operations at overwhelmed terminals.
- c. **Rail infrastructure capacity priority** to be granted by state-owned rail infrastructure managers during the capacity allocation process to intermodal freight trains that are used as part of D2DCT.
- d. **Road toll exemption** should be granted to those battery electric trucks that perform road legs of D2DCT. **Track access charges and state-defined port fees** should also be possible to reduce in conjunction of those services that perform D2DCT.
- e. **Reimbursement of registration and other taxes** applicable to road vehicles used in D2DCT is supported, and it should be extended to the reimbursement of taxes and state-defined registration fees applicable for intermodal rail wagons and waterborne vessels designed for the carriage of intermodal loading units carried in D2DCT operations.

## EU Policies impacted by Combined Transport

The European Union has been battling the adverse externalities of its excessive reliance on truck transport for many decades:

- **Air and noise pollution:** the emission of air pollutants – such as NOx, PM10, PM2,5 and ozone – are proven causes of chronic diseases and premature deaths, while road traffic noise is a nuisance for some 150 million Europeans, one in three citizens of the European Union.
- **Greenhouse gas emissions:** 30% of road transport's greenhouse gas emissions can be attributed to heavy goods vehicles, which account for just 2% of the road vehicle parc using Europe's roads.
- **Road congestion:** over 1% of the EU's annual GDP is lost due to road congestion, which may be attributed to (i) too much road traffic, (ii) maintenance works required due to the excessive circulation of heavy vehicles, and (iii) the poor safety record of road transport.
- **Road accidents:** while being a major cause of road congestion, the consequences of accidents are (i) a major cost to social security budgets and (ii) result in significant losses of future tax revenues.
- **Energy efficiency and fossil fuel dependency:** Europe must rely on the import of fossil fuels to power road transport, as adequate supplies are not available on its territory. This exposes the continent to costly supply risks and security challenges. Non-road modes of transport offer (i) superior energy efficiency and (ii) the capability of being powered by locally generated renewable electricity.
- **Truck driver shortage and the Quality Jobs Initiative:** the increasingly complex task of a long-distance truck driver, coupled with the arduous work/life balance, has resulted in a shortage of Europeans choosing this profession. The labour efficiency of truck driving is very low compared to the jobs offered by non-road modes. Short-haul truck driving, which is an essential component of a door-to-door *combined transport operation*, remains attractive.
- **Military Mobility:** the difficulty of efficiently including rail freight in military transports can be solved by D2DCT, which includes dangerous cargo to/from defence contractors and military depots, ordinance and other supplies, as well as various containerised military gear and vehicles.

## Categorisation of freight transport that use more than a single mode

- **Multimodal freight transport** is the carriage of goods by two or more modes of transport to perform a single transport operation that has a superior overall outcome from a total cost/total impact perspective, including externalities that are not reflected in the price to be paid by the customer.
- **Intermodal freight transport** is a freight subset of multimodal transport, during which the cargo carried in the transport operation is contained from start to finish in a single intermodal loading unit (ILU) – a container, a swap body and a semi-trailer – or a full truck carried in accompanied intermodal transport. The use of an intermodal loading unit (ILU) enables the use of intermodal transhipment techniques which provide the fastest, most efficient and the safest shifting of cargo between several modes of transport.
- **Combined Transport** is a category of intermodal freight transport, which was created by a definition contained in European Union law known as the Combined Transport Directive. The major part of the European journey is by rail, inland waterways or coastal navigation and any initial and/or final positioning legs carried out by road are as short as possible. The definition of Combined Transport refers to those intermodal freight transport operations that *maximise the desirable total cost/total impact door-to-door performance* when compared to the unimodal trucking alternative.

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