UIRR
INTERNATIONAL UNION FOR ROAD-RAIL COMBINED TRANSPORT

POSITION PAPER

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TEN-T Guidelines Regulation for multimodal freight terminals[1]

Main messages

- The recognition is essential that **multimodal freight terminals ensure the access for freight** to the modernised TEN-T infrastructure network.
- The definition of the **infrastructure of terminals** and the **requirements towards multimodal freight terminals** is viewed positively since this will result in an increased harmonisation of terminals resulting in a more standardised service. It is crucial that the definitions, technical and operational requirements contained in the Regulation are understood and applied in a harmonised manner throughout the European Union to which UIRR provides several insights in this paper:
    - Interconnecting road and rail infrastructure,
    - Transhipment equipment and technologies,
    - Gate, buffer and transhipment areas, as well as driving and transhipment lanes,
    - ICT systems of the terminal,
    - Alternative fuelling infrastructure,
    - Digital tools and capabilities of a terminal,
    - Digital data exchange capabilities of a terminal,
    - Capability to receive, tranship and temporarily store various classes of dangerous goods,
    - The efficient handling of 740m long trains,
    - Rules and processes to be followed prior to submitting an exemption request to the European Commission,
    - Digitalisation of data processing,
    - Harmonised data communication across and between the modes and
    - The effective promotion of multimodal transport solutions.
- The **market and prospective analysis on multimodal freight terminals**, to be performed by each Member State, should be done in a harmonised structure using the same definitions and methods.
    - The practice of identifying TEN-T terminal locations and registering the in Annex II of the Regulation,
    - Current and future flow of goods,
    - Harmonised methodology for establishing the actual transhipment capacity of a terminal, and
    - The *catchment area* of a terminal should be established.
- The **role of and the necessary reliance on private capital** in the development of multimodal terminals, as well as the need to respect the freedom of private property.

[1] The TEN-T Regulation uses the term **'multimodal freight terminals'** that are defined as „a structure equipped for transhipment between at least two transport modes, or between two different rail systems, and for temporary storage of freight, such as terminals in inland or maritime ports, along inland waterways and in airports, as well as rail road terminals";

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1. Appreciation of terminals: general circumstances

The recently adopted thorough revision of the TEN-T Guidelines Regulation (2024/1679)[2] attests to the importance of multimodal freight terminals by dedicating an entire new section to terminals: Section VI.[3]

The lawmaker expressed a clear preference for Combined Transport in general:

- **Recital (47)**: *„The infrastructure for combined railway transport and of terminals should be upgraded to ensure that intermodal transport is primarily done by rail, inland waterways or short-sea shipping and that any initial or final, or both, legs carried out by road are as short as possible."*
- **Recital (61)**: *„The trans-European transport network should ensure efficient multimodality in order to allow better and more sustainable modal choices to be made for passengers and freight and in order to enable large volumes to be consolidated for transfers over long distances. Multimodal terminals should play a key role to meet that objective."*

UIRR endorses the spirit of the TEN-T Guidelines Regulation for recognising the role played by multimodal freight terminals in the success of the trans-European transport network. Member States, aided by the EU's Connecting Europe Facility have started to recapitalize their railway infrastructure, which now needs to perform, facilitate efficient transportation services. Value is generated through the efficient and punctual circulation of trains using this expensive infrastructure. And freight trains are particularly well positioned to deliver value on the modern TEN-T railway infrastructure for society, for the economy and for the environment.

Multimodal freight terminals are the gateway for freight to the TEN-T infrastructure much like passenger stations are for passengers. The recognition of the importance of multimodal freight terminals by the European lawmaker is to be applauded. This position paper aims to offer support to the Member States entrusted with the fulfillment of the terminal related provisions of the new European TEN-T Guidelines Regulation.

2. Infrastructure components of multimodal freight terminals[4]

Multimodal freight terminals shall comprise, in particular:

(a) infrastructure interconnecting the different modes of transport within a terminal area and its vicinity; [The TEN-T railway transport infrastructure should comprise the **rail access routes to multimodal freight terminals**[5] as well as the **road access routes**[6].]

UIRR: interconnecting infrastructure upgrades on both the rail and road access of the terminals are needed around several existing terminals. Both the rail- and road-side access capacities should take into account the space available on the premises of the given terminal for traffic processing, primarily the need for both truck and train waiting areas (parking lanes, storage tracks) outside the terminal premises in case the terminal does not prosess the necessary space.

TEN-T parameters for the permitted train length, axle load, loading gauge and possibly electrification should be established on the rail side, while the access roads should be reinforced to handle the trucks performing Combined Transport road-legs, which may weigh up to a gross weight of 44 tonnes.

[2] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024R1679

[3] Articles 36-39

[4] Article 37

[5] Article 14 1. Railway transport infrastructure shall comprise, in particular: (d) the rail access routes connections up to multimodal freight terminals connected by rail, including the rail, access routes up to multimodal freight terminals in inland and maritime ports and airports, and the rail access routes up to 'marshalling yards', as referred to in point 2(c) of Annex II to Directive 2012/34/EU;

[6] Article 29 1. Road transport infrastructure shall comprise, in particular: (d) access routes to multimodal freight terminals; and (e)connections of the freight terminals and logistic platforms to the other modes in the trans-European transport network;

(b) equipment such as cranes, conveyors or other transhipment devices to move freight between different transport modes and for the positioning and storage of freight.

UIRR: the „equipment" should be understood also to include built-in components used by horizontal intermodal transhipment technologies. The infrastructure should also extend to (i) the on-site power infrastructure such as electricity, fossil- and alternative fuel supply, as well as to weighing capabilities or scales (on both the road and the rail side).

(c) dedicated areas such as gate area, intermediate buffer and waiting area, transhipment area and driving or loading lanes.

UIRR: the transhipment area should include the rail marshalling areas, the storage track for wagon-sets and the locomotive turnaround tracks, while the gate area should include office facilities and various security, as well as entry and exit processing systems and structures.

(d) ICT systems for transport are relevant for efficient terminal operations such as those that facilitate infrastructure capacity planning, transport operations, connections between the modes, and transhipment.

UIRR: the hardware that allows the running of the ICT systems should be included, which on occasion may be located on the premises of the terminal, or in a location different from the terminal such as in the 'cloud', as well as the internal communication systems and their infrastructure.

(e) infrastructure for alternative fuels.

UIRR: particularly in the case of high voltage electric chargers, the infrastructure for alternative fuels should extend to the grid connections and dedicated capacities granted to the terminal for charging purposes.

3. Requirements for multimodal freight terminals[7]

Member States shall make all possible efforts to ensure in a **fair and non-discriminatory manner** that all multimodal freight terminals, which are open to all operators and users in non-discriminatory way and apply transparent and non-discriminatory charges in maritime ports and inland ports as listed in Annex II and in all rail road terminals and terminals along inland waterways specified in the maps set out in Annex I and listed in Annex II, meet the following requirements:

1. they are connected to at least two modes of transport which are available in the area;

2. they are, by 31 December 2030, equipped inside the terminal or within the 3 km distance from the terminal with at least one recharging station, as defined in Article 2, point (52), of Regulation (EU) 2023/1804 dedicated to serve heavy-duty vehicles, and, where appropriate, one refuelling station, as defined in Article 2, point (59), of that Regulation, used for hydrogen and dedicated to serve heavy-duty vehicles; and

UIRR: derogation on recharging and hydrogen refuelling stations should be granted upon lacking the necessary electric power infrastructure, spatial need or permission conditions. The business case for the alternative fuelling should also show a positive cash-flow.

3. they are equipped with digital tools to facilitate by 31 December 2030:

(i) efficient terminal operations which may include, photogates, terminal operation system, driver digital check-in/check-out, cameras or other sensors on transhipment equipment as well as rail side camera systems; and

UIRR: derogations to the digitalisation requirements should be considered based on the volume of services to/from the terminal and the subsequent cost-benefit analysis.

[7] Article 38

(ii) the provision of information flows within a terminal and between the transport modes along the logistic chain and the terminal able to exchange information with open and interoperable systems.

UIRR: communication capabilities shall be understood as connected to the RNE TiS (Train Information System) and to be compliant with the requirements contained in the Telematics TSI (TAF TSI) and the EDIGES industry standard.

4. Member States shall make all possible efforts to ensure in a fair and non-discriminatory manner that, by 31 December 2030, those multimodal freight terminals referred to in paragraph 1 which are connected to the rail network, and which carry out vertical transhipment, have enough transhipment capacity and are able to handle the following types of craneable intermodal loading units: container, swap body or semi-trailer.

UIRR: besides intermodal loading unit types, enabling terminals to receive, handle and temporarily store various classes of dangerous cargo should also be made a requirement. Cost-benefit analysis should determine any deviation from this requirement.

5. Member States shall make all possible efforts to ensure in a fair and non-discriminatory manner that multimodal freight terminals referred to in paragraph (1), which are connected to the core rail network or extended core rail network, shall be able to accommodate 740 m long trains without manipulation or, if this is not economically viable, that adequate measures are taken to improve the operational efficiency of accommodating 740 m long trains by 31 December 2040.

UIRR: financing should be offered by the Member State governments to conduct the study on how to handle 740m long trains efficiently in those terminals where a physical extension of the tracks to 740m is not possible.

6. At the request of a Member State, in duly justified cases, the Commission shall adopt implementing acts granting exemptions from the requirements referred to in this Article on the ground of specific geographical or significant physical constraints, in particular when the terminal is located in spatially restricted area, negative result of socio-economic cost-benefit analysis, or significant negative impacts on environment or biodiversity. Any such request shall be substantiated with sufficient justification. A Member State may request the granting of several exemptions in a single request.

UIRR: Prior to drawing up the exemption to be submitted by the Member State to the European Commission a consultation should be held with the terminal in relation to which the Member State considers proposing the exemption. The exemption request should not be submitted without the written consent of the terminal in question.

4. Additional priorities for multimodal transport infrastructure development[8]

In the promotion of projects of common interest related to multimodal transport infrastructure, and in addition to the general priorities, attention shall be given to the following:

(a) removing the main technical and administrative barriers to multimodal transport, including by the implementation of eFTI.

UIRR: the thorough implementation of the Electronic Freight Transport Information Regulation (eFTI) and the inclusion of every applicable administrative requirement is the desired path of digitalisation of European freight transport. Nevertheless, eFTI compliance should only be mandatory for multimodal transport if it is mandatory for every other mode of transport.

(b) developing a smooth flow of information enabling transport services across the trans-European transport system.

UIRR: the implementation of Telematics TSI and the IT support system known as the Train Infromation System (TiS) operated by Rail Net Europe (RNE) can satisfy this requirement the most optimally.

[8] Article 39

(c) promoting multimodal transport infrastructure that facilitates an effective modal shift towards sustainable transport modes.

UIRR: effective promotion of multimodal transport can be facilitated through a differentiated infrastructure usage fees such as road tolls, track access charges, port and inland waterway facility charges.

5. Multimodal Freight Terminals of the TEN-T Network

The multimodal freight terminals of the trans-European transport network are terminals that are **open to all operators** and users in a **non-discriminatory way** and are located in or adjacent to maritime or inland ports or are classified as rail-road terminals in Annex II. of the Regulation.

UIRR: the practice of identifying and registering TEN-T network terminals differs to a great extent from Member State to Member State, which should be harmonised. The terminal listing in Annex II is incomplete. The first action to be taken by Member States is to invite the terminals on their territory to declare their belonging to a TEN-T corridor, and if found qualifying based on the criteria contained in the Regulation, to initiate their addition to Annex II. of the Regulation. Terminals developed exclusively with private capital should also be considered for inclusion into Annex II.

Member States are required by the Regulation to „**conduct a market and prospective analysis on multimodal freight terminals on their territory and elaborate an action plan for the development of a multimodal freight terminal network**."

Member States shall make all possible efforts to ensure that there is **sufficient multimodal freight terminal capacity** serving the trans-European transport network, taking into account current and future traffic flows, in particular flows serving urban nodes, industrial centres, ports and logistics hubs. It is essential that the market and prospective analysis is done in a homogeneous structure that enables comparability for assessment purposes, as well as for quality assurance to eliminate, for instance, any duplications or to identify any potential gaps.

UIRR: Terminals developed with private capital should also be taken into account during the process of ensuring sufficient terminal capacity is available on the territory of a Member State. The use of private capital in the development of multimodal terminals should be encouraged, especially considering the limits of public financing. In this process, the freedom of the resulting private property should be respected as prescribed in civil law.

6. Market and prospective analysis on multimodal freight terminals[7]

Member States will conduct a **market and prospective analysis on multimodal freight terminals** on their territory by 19 July 2027[9].

UIRR: Member States are encouraged to conduct the required analysis as soon as possible since this analysis will highlight essential aspects from the perspective of developing Combined Transport. The analysis should be designed in a manner to be used as the Member States report mandated under the Combined Transport Directive. The intermodal sector offers its collaboration to develop the specification of the analysis in every Member State.

Conditions and components of the analysis according to the Regulation:

1. examine the current and the future traffic flows of freight, per transport mode.

UIRR: The examination should include final goods transport for the supply of end-custmers (consumers), intermediate goods and raw material user economic actors and transiting goods flows. Sources of empirical data complemented by targeted representative surveys should be used as the data-input. Cargo type per mode: cannot link to specific mode or routing. Time-range (scope) of study should be 35 years (=lifetime of a terminal).

[9] Article 36 3.

2. identify the existing multimodal freight terminals of the trans-European transport network on their territory, and assess the need for new multimodal freight terminals or additional transhipment capacity in existing terminals; and

UIRR: Terminals identified should include both those facilities located in the municipalities listed in Annex II as well as the ones that are not yet in Annex II. The needed new multimodal terminals should be defined in line with land available in the near vicinity of railway lines, as well as with a view to the areas where significant cargo movements take place.

Identify also terminals developed purely with private capital and assess the likelihood of their continued operation.

UIRR: Terminals developed with purely private capital play an important role in present-day multimodal freight transport, and these facilities will continue to play a crucial role in the future.

"Transhipment capacity" has a physical capacity component, an access capacity component and an operating circumstance component, which must be evaluated factoring the opening hours, composition of trains and punctuality performance perspectives over time. These all need to be determined to establish the real available capacity during which the buffer role of terminals as the locations of train turnaround also needs to be considered.

3. Analyse how to ensure adequate distribution of multimodal freight terminals with adequate transhipment capacity in order to meet the needs identified in point (b), this shall take into account the terminals located in border areas of neighbouring Member States.

UIRR: The *catchment area* of each terminal should be defined to determine the geographic distribution of multimodal freight terminals. The areas should be drawn up with a view to the road-side connections of the terminal, while factoring the transhipment capacity available and needed. Rail infrastructure managers should identify land that is near active railway lines, which is suited to be developed into a multimodal freight terminal. Additional land survey should be conducted to identify plots favourably situated to function as a multimodal freight terminal. Member State governments should assist the development of multimodal freight terminals on their territory with expropriations if needed.

4. Member States shall consult shippers, transport, logistics operators, as well as other relevant stakeholders which operate on their territory. They shall take into account the results of the consultation in their analysis.

UIRR: The European Combined Transport Community – represented by UIRR – offers to contribute to the list of stakeholders to be consulted within each Member State.

5. Member States shall notify the results of the analysis to the Commission without delay.

UIRR: The European Commission should publish the multimodal freight terminal analysis of each Member State on its website.

7. Action plan for the development of a multimodal freight terminal network[8]

Member States shall elaborate an action plan for the development of a multimodal freight terminal network, including locations where such needs have been identified[10]. This action-plan should be notified to the Commission within 12 months from the analysis on multimodal freight terminals, meaning no later than by 19 July 2028[11].

UIRR: It is recommended that rail infrastructure managers are requested to review their land holdings and identify those plots and/or unused railway facilities which could be redeveloped into a multimodal freight terminal. Drafting of the action plan should take place in parallel with the analysis so it can be completed and notified to the Commission together with the analysis itself.

Terminals developed with private capital should also qualify for development assistance.

8. Terminal-related tasks for the European Transport Corridors

The Coordinators of the European Transport Corridors, which are due to integrate the Rail Freight Corridors, should include in their work plans – to be completed by 19 July 2026 – among others the corridor relevant elements of the analysis, the action plans elaborated by the Member States pursuant to Article 36(4) of this Regulation and the list referred to in Article 18, point (b), of Regulation (EU) No 913/2010 for the aspects related to the multimodal freight terminals[12];

UIRR: Member States should share any draft work or preliminary data with the Coordinators of the European Transport Corridors available ahead of the completion and submission to the European Commission of their analysis to enable the drafting of the most thorough work plans possible by the Coordinators.

Annex: Road and/or rail connection upgrades needed to existing terminals of Annex II of the Regulation

UIRR: More precise decription of the terminals than the municipality of its location should be given as several locations in Annex II. may be hosting more than one transhipment facility with their own respective connecting lines to the nearby TEN-T mainline.

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[10] Article 36 4.

[11] On the basis of that action plan, Member States shall notify to the Commission a list of rail-road terminals and terminals along inland waterways which they propose to add to Annexes I and II. – the conditions are: 800.000 tonnes of cargo volume handled at the terminal per year and it is the main road-rail terminal designated by the Member States for a NUTS 2 region.

[12] Article 54 paragraph 3 point (f) (iii)