

Position Paper – FINAL

Brussels, 9 September 2021

**CER Position on the draft
Inception Impact
Assessment for the
Revision of the Combined
Transport Directive**

CER Position on CT Directive Revision

General support to the Commission's objective and approach

CER welcomes the launch of the work on the revision of the Combined Transport Directive and the draft roadmap which the Commission published on 19 August 2021 outlining its intended actions until a legislative proposal comes out in Q4 2022.

More specifically, CER supports the intention of the Commission to explore the option of extending the current scope of the directive, from Intermodal-Loading-Units-(ILUs)-based Combined Transport to all intermodal and multimodal transport that promise to save on externalities when evaluated against road-only transport. Indeed, multiple intermodal solutions exist that rely on various transshipment techniques other than sole ILU-based techniques. From this point of view, CER looks forward to the results of the study that Commission is currently carrying out on transshipment techniques. Also, some unimodal solutions (like block trains and, above all, single wagonload transport) provide environmentally-performing end-to-end logistic solutions compared to road-only solutions.

CER also supports the three options which the Commission intends to explore and assess, beyond the option of keeping the status quo (Option 1), i.e.:

- Option 2 : Extension of the scope to all intermodal or multimodal transport operations (as described above).
- Option 3: Option 2 plus an additional requirement of regular transport system analysis to assess the efficiency of the support measures chosen by the Member States.
- Option 4: Option 3&4 plus a range of mandatory support measures (to be explored during the assessment phase).

Proposal: Enhancement of rail-road interoperability

In its draft roadmap, the Commission underlines the need to revise the CT Directive in an integrated approach with other regulations including the directive which governs the **use** of trucks and trailers (the Weights and Dimensions Directive 96/53/EC). CER would like to recommend to extend the reflection to the **type approval of future trucks and trailers** to be put on the market according to the Masses & Dimensions **Regulation 1230/2012**. Indeed, the promotion of intermodality is not only a matter of organisational and financial incentive but also a matter of technical compatibility between modes. All too often, trucks (which technically comply with type approval requirements) have to be turned down at intermodal terminals because they do not fit on freight wagons. This is, amongst others, due to insufficient foldability or retractability of devices which regulation 1230/2012 allows to protrude outside permissible dimensions, but not only.

If intermodality is to become the future of transport, then it is crucial to make sure that trucks and trailers are designed to be **rail-interoperable by default**. To this end, solutions may be developed which may not necessarily be legislation-based to enhance the "**Interoperability of Trucks & Trailers with Other Modes**". CER is ready to share its views on the enhancement of rail-road interoperability as a way to support intermodality.

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About CER

The Community of European Railway and Infrastructure Companies (CER) brings together railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 73% of the rail network length, 76% of the rail freight business and about 92% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us on Twitter [@CER_railways](https://twitter.com/CER_railways) or [LinkedIn](https://www.linkedin.com/company/cer).

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