

Open Public Consultation on the revision of Combined Transport Directive 92/106/EEC

Fields marked with * are mandatory.

Introduction

The [Combined Transport Directive](#) (the Directive) is the only EU legal instrument that directly supports intermodal freight transport and more specifically the shift to lower emission transport modes. However, the Directive is partially outdated and has become less effective, as shown by the 2015 ex-post evaluation.

With increased ambition on policy objectives deriving from the [European Green Deal](#) and the [Sustainable and Smart Mobility Strategy](#), a revision is required to achieve these renewed policy goals on the reduction of negative externalities by substantially boosting the amount of freight transported by more sustainable modes, in particular rail, inland waterways, and short sea shipping.

The revision of the Directive will look at issues that are specific to intermodal/multimodal transport and that involve all or several modes. It will be carried out in an integrated approach with other mode-specific transport policy initiatives aiming to facilitate the use of more sustainable modes. This includes revisions of the [Rail Freight Corridors Regulation](#) in the rail sector and the [Weights and Dimensions of Trucks Directive](#) in the road sector, the implementation of the [Naiades III Action plan](#) in the inland navigation sector, as well as the [revision of the TEN-T Guidelines](#) tackling the issues related to infrastructure.

This consultation aims to collect the views of the public and stakeholders about the obstacles to the use of intermodal/multimodal freight transport as well as possible solutions.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Elias

* Surname

Rito

* Email (this won't be published)

eri@fecc.org

* Country of origin

Please add your country of origin, or that of your organisation.

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| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
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- Bouvet Island
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- British Indian Ocean Territory
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- Burundi
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- North Macedonia
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- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
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- Turkey

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- Turkmenistan
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- United Kingdom
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- Uruguay
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General

Transport has significant external costs for society. The large majority of these external costs is caused by the road sector, which dominates the inland freight transport market (75%). EU legislation for transport, energy and the environmental legislation has reduced the negative externalities and will continue to do so, with a focus to cut greenhouse gas emissions by 55% compared with 1990 levels by 2030.

The European Green Deal stated that a substantial part of freight carried today by the road sector should shift to rail and inland waterways. However, progress is not in line with what is required to achieve the European Green Deal's objectives.

As set out in the Sustainable and Smart Mobility Strategy, to meet these objectives, a significant uptake of more sustainable transport options is needed. However, the market does not currently provide sufficient incentives to shippers and transport organisers to use more sustainable transport options. In addition, there is room to improve the efficiency, quality and availability of these options. In particular on short- and medium-distances (up to around 700 km), road-only transport is often cheaper, faster, and easier to organise.

Full internalisation of external costs would ensure that prices of different transport options reflect all related societal costs such as infrastructure use, damage caused by air pollution, noise, greenhouse gas (GHG) emissions, congestion and accidents.

However, full internalisation is not expected to be in place until by 2050. This will be achieved, by gradually implementing the 'polluter pays' and 'user pays' principles. Meanwhile, without actions to promote the use of intermodal and/or multimodal transport, the uptake of more sustainable freight transport options, combining road with rail and waterborne transport, will not take place to the necessary degree and pace.

Here, "multimodal transport" refers to freight transport using more than one mode of transport, where the goods are transhipped (unloaded, loaded) between different modes of transport. "Intermodal transport" refers to a type of multimodal transport where the goods are transported within an intermodal loading unit (such as a container or semitrailer) and this loading unit is transhipped between different modes of transport without the actual goods being handled at transhipment.

Q1. How important is it to increase the use of rail and waterborne freight transport for achieving EU environmental and climate objectives?

Q2. How relevant are the following reasons in relation to a limited uptake of intermodal /multimodal transport (on a scale of 0-5, where 0 is not relevant and 5 is most relevant):

	0	1	2	3	4	5
Incomplete internalisation of external costs (e.g. infrastructure costs, GHG emissions, pollution, congestions and accidents) and an internalisation gap between the modes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inherent disadvantages of intermodal/multimodal transport, such as higher costs and delays due to transshipment and the complexity of organising and operating the transport chain	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inefficiencies related to rail and waterborne operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inefficiencies specific to intermodal/multimodal operations, such as interoperability problems or problems to track cargo in multimodal chains	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of information for users and consumers about negative externalities occurring due to transportation of their goods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other - please clarify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q3. Should EU or Member States policies support increased use of rail and waterborne transport? Note that the support can take a form of regulation, economic support or other measures?

- Yes, but support should exist only at EU level
- Yes, support should exist at both EU and Member State level
- Yes, but if support is provided (also) at EU level, it should only be provided in limited circumstances - please clarify below
- Yes, but it should be left entirely up to Member States
- No, neither at EU nor national level
- I don't know

Q4. Today, there is limited comparable data available on the intermodal/multimodal transport at EU and Member State level. Do you think there should be planning and /or reporting obligations for EU and/or Member States such as regular analysis of the market situation and future trends, as well as an obligation for Member States to report on their progress in terms of the more sustainable modal composition of the transport system and the need for further support?

- Yes, the Directive should include planning and reporting obligation, but only at EU level
- Yes, the Directive should include planning and reporting obligations both at EU and Member State level
- Yes, the Directive should include planning and reporting obligation, but only at Member State level
- No, the Directive should not include any planning and reporting obligations
- I don't know

Q5. Any other general comments?

1500 character(s) maximum

Problem analysis

The [2015 ex-post evaluation](#) established that the current Directive is neither efficient nor effective mostly due to:

- limited scope and definition of eligible operations,
- outdated provisions and
- a level of support that is too low.

In 2017, the Commission adopted a proposal to amend the Directive to improve its effectiveness. However, it withdrew this proposal given that several amendments introduced by the European Parliament and Council distorted the proposal in a manner which prevented achievement of its objectives. The new ambitions of the European Green Deal also make it necessary to further develop multimodal solutions.

Q6. In your experience, is intermodal/multimodal transport competitive with road-only transport in the EU without support?

- Always or almost always
- In some situations - please clarify below

- Never or almost never
- I don't know

Q7. In your experience, what is the average break-even distance for non-road leg of that intermodal or multimodal transport to become competitive with road only transport (fill in for operations you have experience in)?

	Km of non-road leg in intermodal transport	Km of non-road leg in multimodal transport
For operations involving rail		
For operations involving inland waterways		
For operations involving short sea shipping (coastal shipping)		
For operations involving at least 2 modes other than road		

Q8. In your experience, are there differences in the competitiveness of intermodal /multimodal transport between different Member States? If so, why

1500 character(s) maximum

Q9. To what extent do the following factors affect the lack of competitiveness of intermodal/multimodal transport compared with road-only transport (on a scale of 0-5, where 0 is no impact and 5 is very strong impact)?

	0	1	2	3	4	5
Lack of suitable terminals as regards loading units handled in the vicinity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of suitable service offer as regards connection in terminals in the vicinity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor quality of service in terminals in the vicinity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transshipment cost	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-road leg cost of intermodal/multimodal operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road leg cost of intermodal/multimodal operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road leg cost of intermodal/multimodal operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost or availability of specific loading units	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transaction and legal costs due to multiple parties being involved	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Disadvantaged pay load capacity compared with road-only transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Delay/longer transit time compared with road-only transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Low reliability of intermodal/multimodal operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inflexibility of intermodal/multimodal transport compared with road-only transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of organising the operation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of carrying out the operation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity due to different civil liability regimes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Complexity due to different transport documents for different modes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inability/unreliability as regards tracking and tracing the shipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other data exchange related issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of knowledge about intermodal/multimodal transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road transport being cheaper than intermodal /multimodal transport for door-to-door operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Habit of using road-only transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other - please clarify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. Assuming a situation where intermodal/multimodal infrastructure is available, how important is it to apply policies or support measures to the following actors to promote the use of intermodal/multimodal transport (on a scale of 0-5, where 0 is not important at all and 5 is very important)?

	0	1	2	3	4	5
Road transport operators (hauliers), to better internalise external costs (e.g. through road taxation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Rail and waterborne transport operators (carriers), to improve price-competitiveness of their services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Shippers (i.e. the party who orders the transport and is in a position to give the transport and handling instructions, usually the seller) to encourage them to choose intermodal/multimodal options	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transport organisers (e.g. logistics companies, freight forwarders) to encourage them to choose intermodal/multimodal options	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The final customer, to inform them about and enable them to choose more sustainable intermodal /multimodal transport options.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q11. Other comments on the problem analysis?

1500 character(s) maximum

Eligibility

The eligibility in today's Directive is based on the principle that the full operation and the different parts (legs) thereof have to meet specific distance criteria. Thus, for an operation to be eligible for support under the current Directive, the following criteria have to be met:

- combined transport operation must involve at least 2 Member States, but the operation can continue outside of the EU as long as the part of operation that takes place within the EU meets all the listed conditions,
- the loading unit must be 20 foot or longer,
- the non-road leg must be at least 100 km,
- a road leg must be no longer than 150 km if waterborne transport is used for the main leg, or a road leg must only go as far as the nearest suitable terminal in the case of rail-road combined transport. The operation can have one or two road legs (initial and/or final).

Operations that do not meet all the criteria are not eligible.

The main shortcomings established in the 2015 ex post evaluation relate to the fact that the current Directive allows to support some operations that do not increase enough the uptake of more sustainable modes of transport. Namely, while the aim of this definition is to ensure that road legs are of limited distance and non-road legs are long, it allows to support operations where the combined distance of road legs is longer than non-road transport. It also allows supporting operations that would use non-road transport in any case, such as island connections. Other shortcomings identified refer to difficulties in interpreting the specific criteria such as the "nearest suitable terminal".

Q12. In your view, should the principles that set out the eligibility for support:

- remain same as today
- be based on the current principles (distance limitations in particular), but with modification
- be based on new principles

Q13'. If you consider other criteria that should be applied, please clarify.

1500 character(s) maximum

Q14. If you have comments on the above principles, please elaborate:

1500 character(s) maximum

Q15'. Please clarify which other externalities should be taken into account for eligibility of operations:

300 character(s) maximum

Q18. For calculating eligibility based on avoided GHG or a wider list of negative externalities, should there be:

- a centralised calculator developed and maintained by the Commission
- a detailed harmonised methodology at EU level, based on which accredited calculators can be developed by operators, or provided by private third parties or by Member States
- a general methodology at EU level, based on which calculations can be carried out by operators, or provided by private third parties or by Member States
- there should be no methodology at EU level; only methodologies at Member State level.

Q19. The current Directive includes provisions on information to be provided at roadside checks to prove eligibility, which are outdated and ineffective according to the 2015 ex post evaluation. To improve the ability to follow (to track) an intermodal /multimodal operation from door-to-door, do you think there is need to provide for:

- an obligation for transport organisers (e.g. logistics companies, freight forwarders etc.) to ensure that carriers can prove at road-side checks that the transport leg is part of an eligible operation
- an obligation for transport organisers to clearly identify the loading unit and use this identification when providing any regulatory information accompanying the goods, making it possible to follow the loading unit through the transport chain
- an obligation to use a single multimodal transport document for all parts of the operation
- other - please clarify below

Q20. Have you any further suggestions on how to minimise the administrative costs arising from the need to prove eligibility, without compromising the Directive's objectives?

1500 character(s) maximum

Support measures

The current Directive supports combined transport through regulatory and economic support measures on the road legs, given that at the time of the adoption only road transport was liberalised. The regulatory measures aim at ensuring competition by banning quotas and price regulation. The economic support measures aim at increasing the price competitiveness of combined transport through reimbursement of certain road-leg costs to road hauliers.

Today, all parts of intermodal/multimodal transport operations have been liberalised and the 2015 ex post evaluation established that most of the support measures in the current Directive are neither effective nor efficient. New support measures could also be economic (such as operational subsidies for transshipment costs, reimbursement of charges, support for technological upgrades) or regulatory (allowing application of more favourable regulatory provisions such as higher weights or dimensions for road legs or exemptions from night /weekend driving bans).

Q21. In your view, what should the support measures aim at (choose the order of importance, where 1 is most important aim)?

	1	2	3	4	5
Compensate only for the external costs internalisation gap between modes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide support to cover the inherent disadvantages of intermodal/multimodal transport in order to make intermodal/multimodal operations price-competitive vis-a-vis road-only transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide support to cover the inherent disadvantages of intermodal/multimodal transport, but only as long as the external costs internalisation gap between modes persists	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide support to remove the inefficiencies in intermodal /multimodal transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other - please clarify below	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q22. In your view, how important are the following possible support measures for supporting intermodal/multimodal transport? To remind you, the infrastructure issues will be dealt within the revised TEN-T Guidelines and sectoral issues will be dealt within sectoral regulation (on a scale of 0-5, where 0 is not important at all and 5 is very important).

	0	1	2	3	4	5
Administrative (simplification of procedures)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulatory support, i.e. application of more favourable regulatory provisions for eligible operations such as higher weights or dimensions for road legs or exemptions from night/weekend driving bans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic support to operations, e.g. direct operational subsidies for transshipment costs, reimbursement of charges or tolls.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic support for technological upgrades, e.g. support for retrofitting semi-trailers to be craneable or support for adopting electronic documentation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other - please, clarify	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q23. The support measures in EU law can have different level of harmonisation as shown below.

Level of harmonisation

A. Fully harmonised: the support to be given is set out in depth in the Directive not leaving Member States with any discretion. In principle, economic support through fully harmonised measures does not constitute State aid and any such economic support would be exempted from the application of State aid rules and procedures. For example, each Member State must reimburse 30% of transshipment costs that arise on their territory.

B. Partially harmonised: Member States can design their own support scheme within given parameters. State aid rules and procedures would apply to economic support measures. For example, each Member State decides on the percentage of transshipment costs it would reimburse.

C. Not harmonised: Member States can design their own support scheme. State aid rules and procedures would apply to economic support measures. For example, some Member States reimburse a percentage of transshipment costs, some a fixed amount, while some provide a tax reduction for transshipments.

Please choose the level of harmonisation you consider most appropriate for the different types of support measures.

	Fully harmonised	Partially harmonised	Not harmonised	Depends on the actual measure
Administrative measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulatory support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic support for operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic support for technical upgrades	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other, if you chose other in question 22	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q24. The support measures in EU law can have different level of obligation as shown below:

Level of obligation

D. Mandatory: all Member States have to provide the prescribed support.

C. Mandatory with choice: all Member States have to provide support but have a

choice as to what. For example, Member States have to apply one support measure per type of support.

E. Voluntary: Member States can choose whether to provide any support or not.

Please choose the level of obligation you consider most appropriate for the different types of support measures.

	Mandatory	Mandatory with choice	Voluntary	Depends on the actual measure
Administrative measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulatory measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic support for operations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic support for technical upgrades	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other if you chose other in question 22	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q25. In your view, should the support measures in the current Directive be maintained, extended to all new eligible operations or be remove?

	Maintain for currently eligible operations only	Extend to all new eligible operations	Remove	I don't have an opinion
Ban on quotas for combined transport (Article 2)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Equivalence with international road transport as regards non-application of cabotage on international transport (Article 4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tax reductions or reimbursements to road hauliers of RoLa (Rolling Highway – full trucks travelling on special rail wagons) combined	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

transport operations (full road vehicles carried on rail) (Article 6.1.)				
Tax exemptions to road hauliers for vehicles used exclusively for combined transport operations (Article 6.2.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exemptions from compulsory tariff regulations for road legs (Article 8)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q26. Please give concrete examples of what kind of support measures would be relevant and effective in your view for intermodal/multimodal transport:

1500 character(s) maximum

Q27. Who should be the beneficiaries of **economic** support measures (choose all applicable)?

- Shippers, i.e. the party who orders the transport and is in a position to give the transport and handling instructions, usually the seller
- Transport organisers (e.g. logistics companies, freight forwarders)
- Transport operators (railway undertakings, road hauliers, barge operators, maritime shipping companies, terminals)
- Others - please clarify below

Q28. In your view, should there be a cap on economic support measures?

- Yes, fixed percentage of supported costs
- Yes, maximum amount per loading unit/operation, etc.
- Yes, different caps should apply to different types of economic support
- No
- No opinion

Q29. Any other comments on support measures?

1500 character(s) maximum

Regulatory provisions applicable to economic operators

The current Directive does not contain any obligations on transport operators beyond information to be provided at roadside checks. It could be beneficial to include in the Directive certain regulatory obligations or other regulatory provisions that aim to make intermodal /multimodal transport more efficient and reliable and are not specific to separate modes of transport (which should be regulated in sector specific regulation). Examples of such measures include obligations or conditions or standards on data sharing or collecting, mandatory or voluntary intermodal/multimodal terminal classification/labelling based on infrastructure available and/or services provided etc.

Q30. Should regulatory provisions applicable to transport operators (including terminal operators) be considered in this revision?

- Yes. Please give examples below
- Maybe, but I don't know what
- No

Q31. Any other comments on regulatory provisions applicable to economic operators?

1500 character(s) maximum

Additional comments and contributions

Q32. Do you wish to add additional comments on related matters?

2000 character(s) maximum

Q33. Do you wish to upload a position paper in addition to filling in the consultation questionnaire?

Only files of the type pdf,doc,docx,odt,txt,rtf are allowed

Contact

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