



The Greening Freight Package:
the evaluation of the Combined Transport Sector

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UIRR, the Industry Association for Combined Transport



Mission and vision



Zero-Carbon Combined Transport is the solution for well performing longer distance surface freight logistics in a carbon-neutral Europe

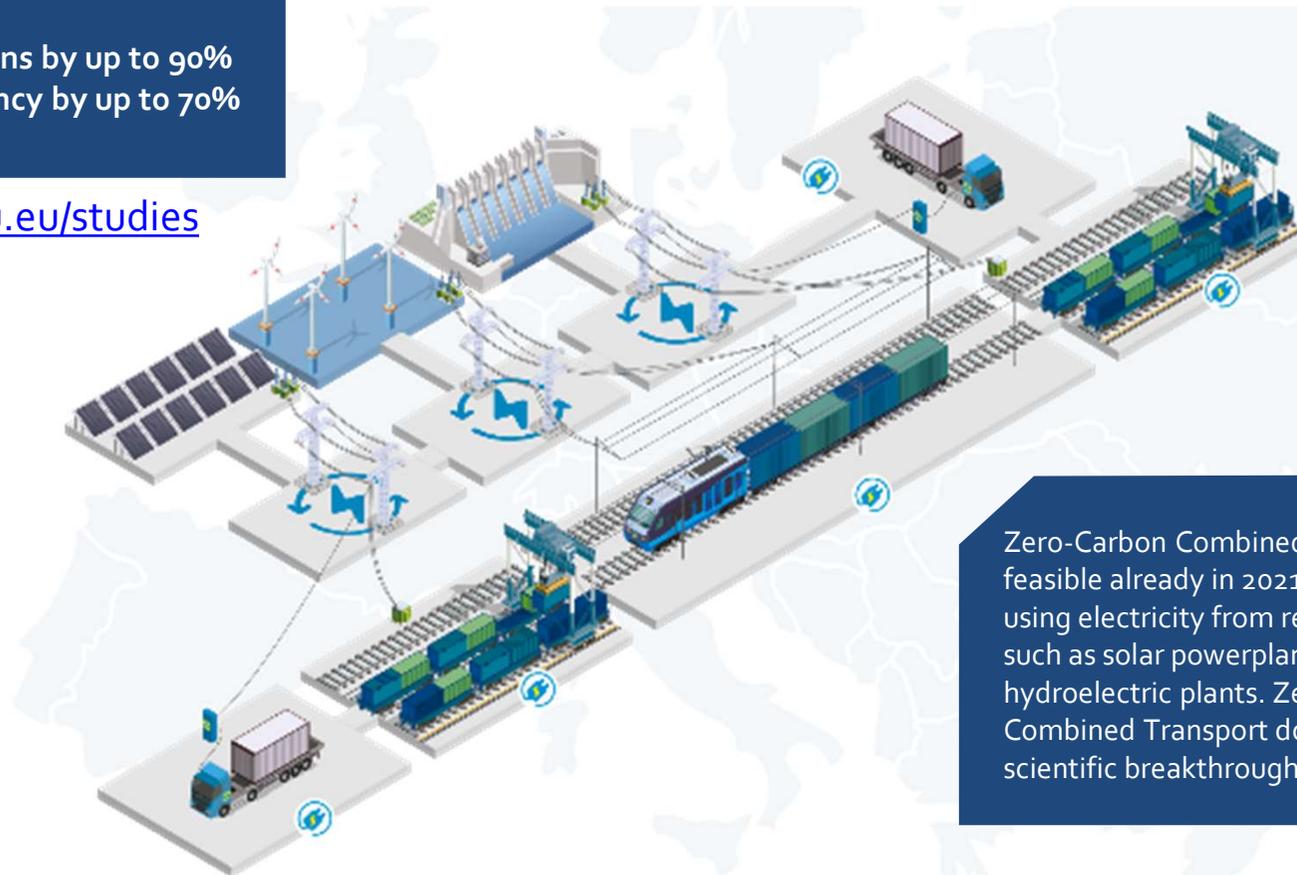


UIRR advances the development and actively promotes competitive zero-carbon Combined Transport for Europe

Zero-Carbon Combined Transport

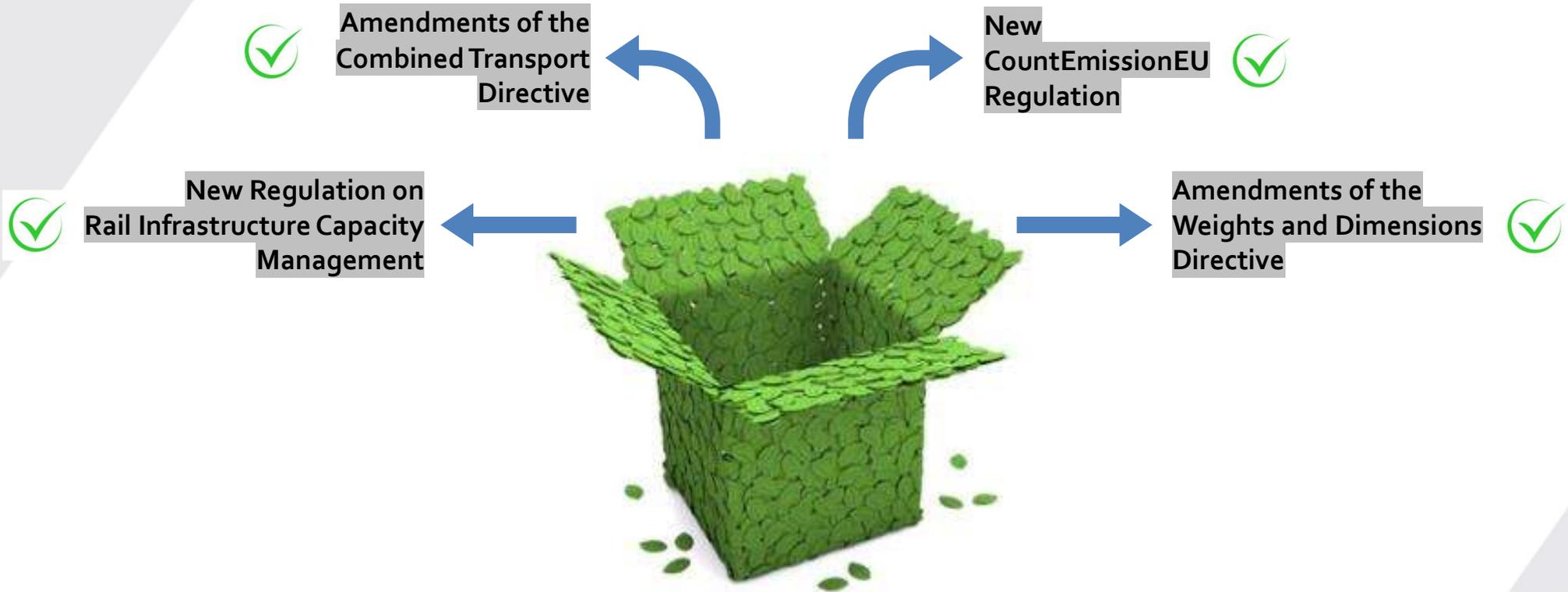
Reduces carbon emissions by up to 90%
Improves energy efficiency by up to 70%

<https://www.ct4eu.eu/studies>



Zero-Carbon Combined Transport is feasible already in 2021* through directly using electricity from renewable sources such as solar powerplants, windmills and hydroelectric plants. Zero-Carbon Combined Transport does not require scientific breakthroughs.

LEGISLATIVE ACTION: the Greening Freight Package



Greening Freight Package: overall objectives

Policy objectives:

- decarbonisation of European freight transport
- zero pollution (air quality + noise)
- boost energy efficiency
- boost interoperability
- boost operating efficiency of road transport
- equivalence between CT road legs and road transport on cross-border relations
- technology neutrality
- promotion of intermodal freight transportation
- + fossil fuel decoupling
- + reduced road-degradation, less road-congestion and fewer road-accidents
- + long-distance truck driver shortage

- **Combined Transport** delivers on every policy objective in an efficient, affordable, industrial-scale and low-risk way

PRINCIPLES TO BE UPHELD THROUGHOUT THE PACKAGE

- interoperability and technology neutrality
- the long-distance low-density cargo segment can not be protected for road transport – this is the largest source for modal shift



Greening Freight Package: Rail Infrastructure Capacity Management Regulation



- **Complicated new structure:**

- ENIM + Network Coordinator
- ENRRB (regulatory oversight)
- Review Board (to assist COM)

- **Legislation delegated:**

- Rules should be adopted by ENIM - COM delegated acts only if needed
- European framework inadequately defined in the EU legislation – too big room for ENIM to invent rules

- **SUGGESTED CHANGES – UIRR AMENDMENTS**

- European train categories and their hierarchy for timetabling, for TCR bypass and to guide traffic management
- Minimum train length on “highly utilised”/“congested” lines: 200m-long trains (?or longer?)
- RNE handbook process + non-rail modes to be considered by IMs during TCR bypass capacity allocation
- Deadlines: do everything as soon as feasible – support ERFA position

Greening Freight Package: Weights and Dimensions Directive amendment

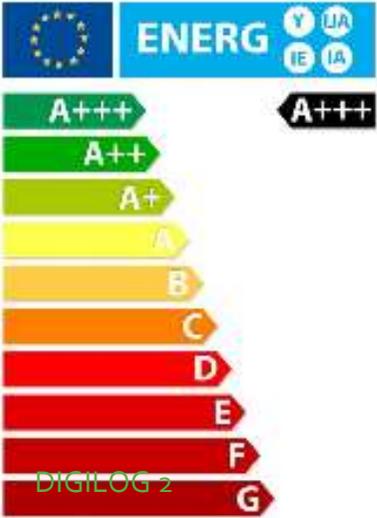


- **Declared objectives:** decarbonisation/efficiency and promotion of intermodal
- **“Decarbonisation”/“efficiency”** = +2 tonnes of weight for batteries, undefined gigaliners and 44-tonne gross vehicle weight across EU borders
- **“Intermodal”** = potential additional GVW including semi-trailers, +30cm HQ containers on road, definition from amended CTD
- **EVALULATION:** superficial distractions to enable EMS/gigaliners – even at the cost of further fragmentation of the single market – and to allow 44-tonne GVW across borders with diesel-powered engines; the proposal breaches the principle of *“technology neutrality”* while *“interoperability”* requirements are missing
- **SUGGESTED CHANGES – UIRR AMENDMENTS:**
 - *interoperability* must be required (in the related type approval regulation amendment)
 - *gigaliner* sizes should be clearly defined including number of tractor axles on 44t GVW combos – must be compatible for combined transport
 - *Freight Transport Information Portal* should be produced by the European Commission



Greening Freight Package: CountEmissionEU Regulation

- Well-to-wheel basis following the ISO14083 standard
- Optional to use, but if declaring carbon footprint then only according to single ISO14083-compliant methodology
- UIRR AMENDMENT** : should be mandatory for all types of transport-chains
- ADDITIONALLY:** (mandatory) labelling of transport-chains



Greening Freight Package: Combined Transport Directive amendment



UIRR intelligence information on main content-elements and scope

- **New definition:** using a calculator that compares a door-to-door intermodal service with its road-only alternative in terms of external costs (based on the CE Delft Handbook) – if the intermodal service reduces these external costs by 40% than it qualifies as “Combined Transport” and benefits from the measures
- **Initial assessment**
 - Explicitly and quantifiably recognising **the externality advantage of Combined Transport over long-distance unimodal truck transport,**
 - Requiring Member States to draw up a **strategic freight transport plan** and within it a chapter specifying the objectives to be achieved through Combined Transport,
 - Mandating the implementation of a mix of support measures that result in **at least a 10% reduction in the operating costs of Combined Transport.**
 - Extending the qualification of Combined Transport to also include **purely domestic operations.**
- **UIRR Position Paper: in preparation**





Legislative and implementation schedule: timing for the next 30 months

A challenging and historic 30 months are ahead of the European land freight transportation sector.

Title	2023				2024												2025											
	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
TEN-T Regulation	trialogue phase																											
	final vote																											
	EUOJ																											
Energy Taxation Directive	?consideration																											
	?withdrawal																											
GFP - Capacity Regulation	consideration																											
	first reading																											
GFP - CTD, WDD, CountEmission	consideration																											
	first reading																											
Presidency >	SPAIN		BELGIUM					HUNGARY					POLAND				DENMARK											
Implementation deadlines																												
Eurovignette / eurotolling																												
Mobility Package																												
MP-related ECJ decision																												
Smart Tachograph Regulation (delayed by MS())																												
Electronic Freight Transport Information Regulation																												



THANK YOU
For your attention

CORTEN
STEEL
PANELS

MAX GROSS TARE 67 200 kg
2 250 kg
4 960 lbs

MAX. PAYLOAD CUBE 28 230 kg
62 240 lbs
33.0 m³
1 170 cuft

JNPT