



Opinion of the Confederation of Industry of the Czech Republic (SP CR) on the proposal of the Revised Combined Transport Directive

If set up correctly, the Combined Transport Directive could further develop combined transport and thus reduce negative environmental impacts, emissions and energy consumption.

Investments in combined transport should ideally ensure the expansion and standardisation of such transport – greater use of interoperable semi-trailers, trailers and containers, greater automation of systems, support for the entry of new players, construction and modernisation of terminals, etc. This should reduce the negative externalities of road transport **and increase the capacity and speed of freight transport, which would again stimulate economic growth.**

Article 1a

We welcome the extension of the scope to all combined transport operations within the EU, **including national operations**, operations between Member States and the EU part of international operations with third countries (no longer limited to cross-border operations between Member States).

At the same time, however, the revised directive comes with restrictions and obligations.

Article 1c

The 40% external costs (negative externalities) reduction (required for eligibility for support) could be too strict target and in the worst-case scenario could exclude a significant part of the existing combined transport from eligibility for the support scheme. Unimodal road transport, especially over shorter distances, will become increasingly decarbonised over the next few years.

Moreover, it is unclear what the methodology for the 40% reduction of external cost calculations would be. Given the ambitious scope outlined by the Commission (externalities including greenhouse gas emissions, air pollution, injuries and fatalities, noise and congestion), there is a risk that the administrative burden to prove that a transport qualifies as combined transport might discourage many operators.

A definition based on the proportion of the non-road transport ratio seems more appropriate and simpler. If the objective of reducing external costs is maintained, energy consumption should also be included in the calculation of external costs.

The revision clause must provide for a possible modification if a significant part of combined transport turns out to be ineligible in the future.

On the other hand, there is no clear and simple control mechanism in place to prevent possible abuse of the combined transport support. The Electronic freight transport information (eFTI) platform could be an overly complex and administratively burdensome instrument that would complicate the work of combined transport operators.

Article 3

Burdensome administration should be reduced and minimalised.

Use of the eFTI platform should be as simple and quick as possible. Detailed recording and publication of specific information on the eFTI platform before the start of every operation could be too demanding for organisers of combined transport operations. However, this part of the obligations is not yet clearly defined and it is therefore not yet possible to determine exactly how demanding it will be to comply with such obligation.

Member states should help with obligations and offset most of the costs to ensure overall benefits for both the industry using combined transport and the transport sector.

Article 3a

We welcome the extension of support for combined delivery and the target to reduce by at least 10% the average cost of combined transport operations within 7 years. However, **the time period for meeting the target could be shorter.**

The national policy frameworks for facilitating the uptake of intermodal transport and, in particular, combined transport operations, **must be consistent across Member States.** Leaving room for individual Member States to have **different support schemes** is unfortunate and **may result in distortions of competition between Member States, an uneven playing field within the European Union and limiting the development of combined transport, especially in cases of operators transporting goods over long distances across several Member States.**

Article 9a

The exemption from the driving ban on road vehicles on weekends and public holidays must be maintained as a Europe-wide exemption, otherwise there is a risk of different approaches in neighbouring countries, thereby limiting the development of combined transport.

Link to the Greening Freight Transport package

The revised **Weights and Dimensions Directive** should be more linked to the Combined Transport Directive and, in line with it, should also define the dimensions of intermodal trailers, semi-trailers and cars. Thus, **only vehicles used only for combined transport should benefit from the newly permitted weights and dimensions.**

The need to improve **rail capacity and reliability** is key. We are not sure that the proposal for a **regulation on the use of railway infrastructure capacity in the single European railway area** is a sufficient infrastructure solution. The **proposal is insufficient in measures to secure and increase the long-term capacity of the railway.** The proposal contains only indirect instruments, consultations, etc. **Ensuring an increase in rail network capacity and reliability must be a priority.**