

## Revision of the Combined Transport (CT) Directive – Inception Impact Assessment

Answering to the consultation:

[https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13010-Sustainable-transport-revision-of-Combined-Transport-Directive\\_en](https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13010-Sustainable-transport-revision-of-Combined-Transport-Directive_en)

The Platform for Electromobility welcomes the opportunity to give its feedback on the Inception Impact Assessment for the revision of the “Combined Transport Directive”.

Directive 92/106/EEC is the only EU legal instrument directly targeting combined transport (CT), incentivising a more sustainable operational model for freight transport. Nearly thirty years later, the effectiveness of the Directive needs to be improved as the freight market and transport have gone through considerable changes. Furthermore, the political context has shifted as well, with an increased ambition on emissions-reduction objectives deriving from the European Green Deal and the Sustainable and Smart Mobility Strategy.

The Platform for Electromobility agrees with the European Commission that, without an intervention to promote the use of multimodal transport, the uptake of more sustainable transport options will not take place to the desired degree and in the desired time-frame to reach 2030 and 2050 EU objectives.

Strengthening combined transport fits perfectly into the vision of an integrated and sustainable comprehensive mobility system. The role of intermodal terminals, in this context, stands out through the optimisation of the connectivity of the different modes, and incorporating rail, roads and waterway systems into the freight logistics chain.

Among the options envisaged by the Inception Impact Assessment, Option 3 appears as setting the most effective way to crucially improve the framework for combined transport in Europe. The extension of the support from today’s narrowly defined combined transport operations to all intermodal or multimodal operations, and the categorisation of terminals based on infrastructure and operational efficiency – both proposed also under Option 2 – would broaden the Directive’s scope and streamline investments for combined transport’s infrastructures.

Moreover, Option 3 foresees an assessment of the efficiency of the measures to support the attainment of the objectives of the revised Combined Transport Directive. This measure would improve the reporting and monitoring conditions of the Directive.

Following this further, the Platform remains cautious about the viability of Option 4, which envisages mandatory harmonised support measures – such as a support to transshipment costs. Such proposal may open the door to state aid-related questions and be challenged across Member States.

The Platform for Electromobility looks forward to work with the European Commission to ensure that freight transport do not miss the decarbonization revolution and contributes efficiently to a sustainable, integrated and multimodal mobility system for Europe and set best practices for the world.