

Position Paper

UEAPME¹ Transport Forum Position on Combined Transport

UEAPME Transport Forum is a co-operation platform set up by UEAPME (The European Association of Craft, Small and Medium-sized Enterprises) and bringing together representatives of European branch confederations, SMEs from road transport, manufacturing and repair of road vehicles. It aims to gather different stakeholders and develop joint positions on all road transport-related issues such as sustainable transport, organization of the supply chain, road safety and infrastructure efficiency.

Background:

The European Commission launched a public consultation on 23rd May 2014 in order to address targeted stakeholders regarding the implementation of the Combined Transport Directive (Council Directive 92/106/EEC, hereafter referred to as "the CT Directive"). The purpose of this consultation was to gather information about the implementation of the CT Directive and to assess whether a revision of the CT Directive would be of interest and, if so, what possible enhancements could be made in future revisions of Combined Transport policy. UEAPME Transport Forum answered to this public consultation requesting input from its members.

Our Position:

Objectives of the CT Directive

UEAPME TF is of the opinion that the current CT Directive lacks clarity and therefore is applied in different ways. Since the application of the CT Directive is not harmonized among Member States, undeserved fines and practical problems arise. The CT Directive has not achieved its objectives of encouraging modal shift away from road and associated reduction in road-related impacts. In the view of UEAPME TF, the EU should continue supporting CT operations since it has the possibility to relieve traffic by road.

Definition of Combined Transport (article 1 of the CT Directive)

UEAPME TF **supports the current scope of the Directive** to apply to transport only between Member States. Regarding the road leg, UEAPME TF is **in favour of a limitation to the nearest suitable loading station**.

The longer the distance the more modes may be involved and therefore UEAPME TF **welcomes the inclusion of tri-modal operations**, which will need specific provisions.

¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](https://ec.europa.eu/transparency/regexp1/index.cfm?do=groupDetail.groupDetail&id=55820581197-35).

Transport documentation (article 3 of the CT Directive)

The interpretation of the Directive differs by control authorities in different Members States, which leads to unjustified penalties and therefore UEAPME TF suggest to establish a **single transport document for all Combined Transport operations**.

Cabotage (article 4 of the CT Directive)

UEAPME TF is of the opinion that road freight transport in the framework of the CT directive should not be subject to any quantitative restrictions and thus maintain the exemption of CT operations from the limitations on road transport cabotage. However, **the CT rules must not be used to circumvent the cabotage rules** of article 9 of the 1072/2009 Regulation. It is important to note that the cabotage liberalisation for CT operations still creates labour market/social problems in the Member States.

Improving knowledge of the Combined Transport sector

UEAPME TF recognises the importance to dispose of relevant and valid statistics on the Combined Transport market in order to provide a better understanding of its operations. However, there is a cost and administrative burden for our members to generate this data and reports and it is therefore advisable **to address the terminal operators that dispose of larger data on Combined Transport**.

Boosting freight transport by alternative modes

Following issues are of importance to increase the use of Combined Transport within EU;

- The cost of Combined Transport against equivalent door-to-door road haulage
- The quality of Combined Transport against equivalent door-to-door road haulage
- The speed of Combined Transport against equivalent door-to-door road haulage
- The cost of interchanges in Combined Transport

In addition, an extension of the vehicle combinations that permits a longer than the current maximum authorized length of 18.75m would reduce the number of trucks and could be of importance also to increase the use of Combined Transport.

As a final remark, UEAPME Transport Forum suggests the implementation of the following actions:

- Harmonization of application of the CT Directive
- Inclusion of tri-modal operations
- Establishment of a single transport document for all Combined Transport operations
- Link liberalisation on cabotage in the framework of CT to the article 9 of the 1072/2009 Regulation
- Extension of vehicle combinations

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