

ECTA statement and position on the Combined Transport Directive revision

23 October 2024

ECTA – European Chemical Transport Association – groups the major Transport Service Providers for Chemical Distribution in Europe. Some members are also active in other industries.

ECTA and its members support the ambition to shift volumes from only road to combined transport in the same way as the EU and other major relevant stakeholders. As a major association of LSP's in the transport sector, ECTA members have executed more than two million shipments in the last year by more than one transport mode – mostly using the rail service.

In other words, ECTA members actually shift about 8.500 trucks from road to rail/short sea – daily.

This important European combined transport network was built up on the frame conditions of the existing CT directive from the year 1992.

The recently published proposal for the revision of the CT directive by the Hungarian Presidency seems to our sector not the solution to improve and increase combined transport operations in the future.

We ask you to take into consideration that combined transport is in constant competition with road only transport solutions based on transit time, service and cost. In the following statement a reference to this important factor will be made.

It is ECTA's goal to facilitate the use of combined transport operations rather than building new barriers which, from our point of view, the actual proposal does.

Our concerns are reflected in the following comments:

Article 1c – point 2 (a)

ECTA supports the definition that the aggregate distance travelled through non-road modes shall be at least 50 % of the total distance covered by the combined transport operation between the starting point and the end point of this operation.

ECTA opposes the addition of “as the crow flies” as the basis for the calculation of the non-road leg.

- The difference between the shortest feasible distance in rail to the distance “as the crow flies” is substantial.
E.g. Belgium to North of Italy
Trains are not running the direct way via France (non-availability of adequate rail services) but through Switzerland and Austria
- The CT Directive should support and enable a shift from road only to other transport modes like rail or short sea. This development should not be limited because of the length of first and last leg on the road by truck.

Article 1c – point 2 (b)

ECTA opposes the additional limitation of the road-part in first or last-mile service to a maximum 150 km or the nearest suitable terminal

- The selection of terminals depends on direct rail connectivity, frequency of rail/short sea services, cost of the rail connection, availability of technical profiles (P400 f.e.) and last but not least on the reliability of the rail service.
- Terminals are working independently from rail services and conditions, capacity and costs are negotiated separately of the rail service.
- To make CT able to compete today compared to road only services the above mentioned criteria need to be taken into consideration.
- A massive quantity of CT services today are executed with block-trains with daily departures which is a necessity to make CT competitive compared to road. To operate block-trains and fill them constantly, transport volumes need to be bundled also from remote areas and the road leg might often exceed 150 km.
- The listed exceptions where the distance of 150 km may be exceeded is long and vague and offers room for interpretation by every single stakeholder and member country.

Article 9a – point 2 and 3

ECTA opposes the possible derogation by member countries from driving bans on combined transport.

- Different driving bans in member countries or even on regional level add complexity to the supply chain.
- The industry tends to operate loading/unloading activities also on weekends. CT road legs operating on weekend deliveries will bring trucks on long distance haulages from the road to rail/short sea.

Article 3 – point 3

ECTA opposes the demand to record every single CT operation on the eFTI platform

- This presents an administrative monster which is not the case for road only transport.
- To deliver the proof of at least 50 % of the total distance covered by the combined transport operation can be made much easier.
- How to plan, start and operate block-trains if every single CT operation needs to be “proven” as CT ?
- Additional administrative obstacles are not motivating “pure road carriers” to consider modal shift.

Article 3a – point 2 (a)

The request “as far as possible” to achieve an overall reduction of at least 10 % of the total costs of combined transport operations

- Will not improve the shift from road only to CT as this comment is vague.
- 10 % of what – calculated from which level?
- What is the meaning of “as far as possible”

Article 3a – point 2 (b)

The national measure to enable “an increased upgrade or uptake of technologies improving the efficiency of CT operations”

- We do not need national measures.
- We need a “European Rail Network” to allow Interoperability of rail operations in Europe – such as drivers allowed/able to drive long distances and cross-border. A fact which exists in road only operations.
- What about autonomous driving of trains – the technology is given we need willingness of member states to achieve this epoch-making step forward.