



Joint industry position paper on the Combined Transport Directive

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For logistics and transport operators, as well as for European industry, access to **reliable, competitive and predictable** freight services by **railway, inland waterways and short sea shipping** largely depends on a well-functioning Combined Transport system.

Combined Transport (CT) is a key contributor to achieving the EU Green Deal's ambition, which targets the reduction of transport greenhouse gas emissions by 90% until 2050. Moreover, CT plays a crucial role in improving energy efficiency, reducing road congestion and tackling driver shortages.

Shifting freight from unimodal road freight transport to include rail, inland waterways or short sea shipping is **not a plug-and-play exercise**. Cargo owners and distributors will use CT more widely only if it is **reliable, cost-competitive, and operationally straightforward**, supported by **adequate infrastructure**, sufficient **capacity**, and **end-to-end digital information flows**.

The current Combined Transport Directive is based on outdated 1990s definitions, paper-based enforcement mechanisms, and nationally fragmented incentive schemes. This results in ambiguous eligibility criteria, uneven application and inconsistent enforcement practices across Member States, ultimately emerging as a growing misalignment with today's Single Market realities, digital logistics practices, and various EU policy objectives. In practice, this leads to legal uncertainty for cross border operations, a persistent uneven playing field between road only and multimodal freight transport solutions, as well as administrative complexity that discourages uptake, in particular by SMEs.

A fit-for-future framework for intermodal transport is essential to enable seamless, efficient, and sustainable transport, ensuring that CT can fully deliver on its potential.

The amendment of the Combined Transport Directive is therefore key to improving the competitiveness of intermodal and combined transport and to strengthening the resilience of European industrial supply and distribution networks.

Our Joint Recommendations

To ensure that the EU does not lose momentum on multimodal freight transport we jointly demand:

1. **A rapid restart of legislative work on the revision of the Combined Transport framework**, with the explicit objective of delivering legal clarity, harmonised application across Member States, the emergence of modern and digital CT service, as well as practical and effective incentives for increased uptake of CT.
2. **A clear, stable, and easy to verify eligibility methodology** for both operators and enforcement authorities.
3. **Harmonisation across Member States** by establishing a framework that provides legal certainty for cross border supply chains in line with Single Market principles.
4. **Digitalisation to reduce administrative burden**, including for reporting requirements, while supporting efficient enforcement.
5. **Fast implementation of national policy measures** accompanied by regular assessment of their effectiveness and uptake.

A modern Combined Transport framework strengthens industrial competitiveness by enabling efficient and resilient supply chains, reducing congestion, and providing companies with a broader, more sustainable range of logistics solutions.

Revising the Combined Transport Directive is therefore essential to **reduce costs, improve operational efficiency, enhance regulatory clarity**, and accelerate the transition towards sustainable, multimodal freight transport in Europe.