

5 September 2023

The Greening Freight Transport Package should be kept together

CER, ERFA and UIRR call on the European Parliament and the European Council to **maintain the package approach** when considering the legislative proposals in the 'Greening Freight Transport Package' (GFTP) tabled by the European Commission on 11 July. The amendment of the Weights and Dimensions Directive (WDD) should not be considered on its own merit without seeing the Combined Transport Directive (CTD) amendment proposal. The new CountEmissionEU Regulation is a similarly closely linked part of the GFTP.

The components of the WDD amendment must function in coherence with the objective to reinforce Combined Transport, which offers the greatest energy efficiency in parallel with the lowest environmental load for door-to-door long distance transport. The "operational efficiency measures" proposed in the WDD amendment should primarily focus on shorter distance road transport, while **Combined Transport's standing should be reinforced in the longer distance segments**. Without this logic, the objectives of greening freight transport and promoting intermodal freight transport will not be met.

The reverse modal-shift consequence of introducing heavier and longer vehicle combinations in the proposal as European Modular System (EMS), or ginaliners, has been proven in several studies, which until now served as **the basis for the rejection of the cross-border circulation of ginaliners**. The free circulation of ginaliners carrying average density (palletised) cargo would only act to **increase the 76% market share of road transport**. Only Combined Transport can reduce the number of trucks on the roads, not ginaliners. Average density cargo is the cargo segment from where **modal shift on long distances would be indispensable in order to achieve the desired greening of freight transportation**.

The measures labelled in the WDD amendment intending to promote intermodal transportation are either irrelevant or ineffective. There is only marginal interest in transporting intermodal consignments that would require road vehicles with additional gross weight for the combined transport road legs. Road and motorway managers are already unhappy with 44-tonne trucks as these cause **accelerated wear and tear to the road infrastructure, and more specifically to bridges**.

The introduction of longer and heavier vehicles, or ginaliners, would only result in the enhancement of intermodal freight transportation if the 3 legislative proposals that were designed and presented by the European Commission as forming a single Package are **considered by the European co-legislators as a single package**. CER, ERFA and UIRR call on the European Commission to present its CTD amendment proposal as soon as possible, and ask the European Parliament and the European Council to refrain from progressing the WDD amendment until this time.

Alberto Mazzola, Executive Director of CER stated: *"Electric rail infrastructure enables the direct transformation of non-fossil energy sources into freight transportation performance. Rail is also safer, contrary to HDVs which still cause numerous fatalities and injuries. According to the European Transport Safety Council (ETSC), fatalities provoked by collisions with heavy duty vehicles are declining much less than those involving light vehicles."*

Conor Feighan, Secretary General of ERFA stressed: *"If the European Union is serious about reducing freight transport emissions in the short-term, it is essential that a framework is developed which facilitates modal shift. It is difficult to see how this can be achieved by progressing with the Weights and Dimensions Directive in isolation from other strategic files such as the Combined Transport Directive."*

Ralf-Charley Schultze, President of UIRR, pointed out: *"Technology neutrality as well as the ultimate greening objective requires that the European co-legislators update our laws so that the most energy efficient and least environmentally burdensome transport solution prevails, instead of enacting measures that increase the 76% market share of road transportation, half of which is long-distance transport today. Door-to-door Combined Transport effectively delivers all of our European transport-, energy-, climate-, environmental- and social policy objectives."*

Issuing associations

CER – The Community of European Railway and Infrastructure Companies (CER) brings together more than 70 railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 78% of the rail network length, 81% of the rail freight business and about 94% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policymakers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow @CER_railways.

ERFA – ERFA is the European Association representing European private and independent railway companies. ERFA members share a commitment to work towards a non-discriminatory, competitive and innovative Single European Railway area.

UIRR – Founded in 1970, the International Union for Road-Rail Combined Transport represents the interests of European road-rail Combined Transport Operators and Transhipment Terminal Managers. Road-Rail Combined Transport (CT) is a system of freight forwarding which is based on efficiently and economically inserting electric rail into long-distance (road) transport chains through the use of intermodal loading units (ILU).