



**TEN/747**  
**Intermodal transport and multimodal logistics**

## **OPINION**

European Economic and Social Committee

**Intermodal transport and multimodal logistics –  
making modes complementary in greening transport**  
[own-initiative opinion]

Rapporteur: **Stefan BACK**

Plenary Assembly decision	25/03/2021
Legal basis	Rule 32(2) of the Rules of Procedure Own-initiative opinion
Section responsible	Transport, Energy, Infrastructure and the Information Society
Adopted in section	24/06/2021
Adopted at plenary	07/07/2021
Plenary session No	562
Outcome of vote (for/against/abstentions)	227/0/6

## 1. **Conclusions and recommendations**

- 1.1 A long-term viable solution to developing efficient and sustainable multimodal transport and logistics can only be achieved by dealing with the problems that make multimodal transport more expensive, slower and less reliable than, in particular, unimodal road transport. It cannot be built with financial promotion or regulatory support.
- 1.2 This kind of approach would also be resource-efficient from a regulatory point of view, since no dedicated regulatory framework would be needed.
- 1.3 To improve multimodal traffic, the EESC also recommends, in addition to technical innovation and solution of competitiveness problems, full internalisation of external costs for all transport modes to achieve a level playing field. The EESC calls for serious measures to safeguard and/or relaunch a European single wagon load system, link of strategic infrastructure (e.g. ports) to rail solutions, investment in industrial sidings, and involvement of large logistics companies in a modal reorientation of their flows.
- 1.4 In order to ensure fair competition between transport modes, the EESC recommends socially exemplary behaviour by all transport modes to ensure high-quality transport services, high-quality jobs and good social conditions with a view to achieving a level playing field for all market players.
- 1.5 Current problems relating to multimodal transport are - apart from additional costs due to transshipment and additional transaction costs - disadvantages such as long delivery times, complexity, higher risk and lower reliability, which make it more difficult for multimodality to take off.
- 1.6 Therefore, measures are needed to make multimodal freight transport competitive in its own right and achieve efficient and seamless multimodal freight transport flows at the same cost as unimodal transport.
- 1.7 There is also a need for rail to adapt better to an open market context and remedy problems due to lack of punctuality, reliability, predictability and flexibility, which have a negative impact on multimodal solutions involving rail.
- 1.8 Regarding inland waterway transport, improvements seem to be needed with respect to cross-border transport capacity.
- 1.9 Adequate terminal infrastructure is key to successful intermodality. As a matter of resource efficiency, it would also be useful for Member States to agree to collaborate on the planning of terminal infrastructure in border regions. Distance between terminals should be adapted to demand, density of the network and other local conditions.
- 1.10 With regard to public debt, the EESC recommends that public investment in intermodal infrastructure be exempt from the provisions of the Stability and Growth Pact (SGP) beyond the COVID-19 crisis.

- 1.11 It is important for well-functioning multimodality that regulations regarding, for instance, the handling of dangerous goods between different modes are consistent and that other regulatory and practical issues that may cause difficulties in the interface between modes or in transport between Member States are resolved.
- 1.12 A number of the problems hampering intermodal transport could be resolved by smart digital solutions such as track and tracing possibilities and other digital solutions facilitating the effective management of multimodal transport flows.
- 1.13 Regulation (EU) 2020/1056 on electronic freight transport information will facilitate the exchange of regulatory information between operators and authorities on digital platforms as of August 2024 and improve the flow of intermodal transport.
- 1.14 The EESC calls on the European Commission to consider the above suggestions when drafting its upcoming review of the regulatory framework for intermodal transport and to enable multimodal transport to play its full part in the transport system, without dedicated support measures.

## 2. **Background**

- 2.1 The European Commission Communication on a Sustainable and Smart Mobility Strategy (COM(2020) 789 - the SSM Strategy) points out that, to support the greening of cargo operations in Europe, the existing framework for intermodal transport needs a substantial revamp and must be turned into an effective tool. It singles out the need to review the regulatory framework, including the Combined Transport Directive (92/106/EEC - hereinafter the Directive) and the option of introducing economic incentives for both operations and infrastructure. Incentives should be based on emissions monitoring.
- 2.2 The core of the Sustainable and Smart Mobility Strategy is a 90% reduction in greenhouse gas emissions by 2050. Multimodal transport plays an important role in the strategy, which aims to ensure environmentally-optimised interaction of modes, including reducing the predominance of road haulage.
- 2.3 The SSM Strategy also stresses the importance of multimodal logistics, including in urban areas, underscores the need for efficient planning to avoid empty runs and points to the need to include freight in urban mobility planning.
- 2.4 The SSM Strategy also pinpoints the problem of lack of transshipment infrastructure, including inland multimodal terminals, and the need to improve transshipment technologies, including multimodal exchange of data and smart traffic management systems in all modes. The Commission intends to make funding available and to gear policies, including on R&I, to addressing these issues. State aid rules for rail may also be useful in this regard.
- 2.5 In the Action Plan accompanying the SSM Strategy the Commission plans to carry out a review of the regulatory framework for intermodal transport, including the Directive, in 2022.

- 2.6 In a 2017 proposal (COM(2017) 648), the Commission proposed amendments to the Directive highlighting the need for better Member State coordination regarding the construction of intermodal terminals and various administrative simplifications, but also maintaining the need for a promotional approach including dedicated rules on market access, in particular with respect to the road transport leg. Considerable changes were made to the proposal during the legislative process and the Commission therefore chose to withdraw it.
- 2.7 However, through Regulation EU 2020/1055, which amended Regulation EC 2009/1072, Member States were given the possibility to deviate from the dedicated rules on market access to the road transport leg and apply ordinary cabotage rules.

### 3. **General comments**

- 3.1 A viable long-term solution for developing efficient and sustainable multimodal transport and logistics can only be achieved by dealing with the problems that make multimodal transport more expensive, slower and less reliable than, in particular, unimodal road transport. It cannot be built with financial promotion or regulatory support.
- 3.2 This kind of approach would also make it possible to dispense with complex rules defining combined or multimodal transport and ensuring that operators are entitled to financial support and dedicated rules on market access. It would therefore also be resource-efficient from a regulatory point of view.
- 3.3 To improve multimodal traffic, the EESC recommends, in addition to technical innovation and solution of competitiveness, full internalisation of external costs for all transport modes to achieve a level playing field. The EESC calls for serious measures to safeguard and/or relaunch a European single wagon load system, link of strategic infrastructure (e.g. ports) to rail solutions, investment in industrial sidings, and involvement of large logistics companies in a modal reorientation of their flows.
- 3.4 In order to ensure fair competition between transport modes, the EESC recommends socially exemplary behaviour by all transport modes to ensure high-quality transport services, high-quality jobs and good social conditions with a view to achieving a level playing field for all market players.
- 3.5 The EESC underlines that skilled and motivated workers and good working conditions are an important prerequisite for the successful evolution of multimodal transport. The EESC asks for a review of posting rules to take into account the situation of highly mobile railway staff. Furthermore, the EESC recommends simple, clear and verifiable regulations and an adequate compliance monitoring system to ensure fair working conditions (training, working hours and rest periods, language level, pay, occupational health and safety, modern sanitary facilities, suitable overnight accommodation, etc.) for all transport workers to ensure health and fair competition.

- 3.6 Problems relating to multimodal transport are - apart from additional costs due to transshipment and additional transaction costs - disadvantages such as long delivery times, complexity, higher risk and lower reliability. These make it difficult for multimodality to take off.
- 3.7 A recent study<sup>1</sup> shows a considerable cost difference between unimodal (road only) and intermodal solutions. The additional costs stem from the extra work involved in organising multimodal transport (EUR 50-100 per shipment), longer transit times (ranging from 4 to 120 hours) with an average of 25 hours, incurring an additional cost of EUR 75-100 per shipment and a lack of harmonised document procedures, causing a loss per shipment of EUR 5-150.
- 3.8 The study nevertheless concludes that a financial break-even point may be found on long distances and quotes, not counting support measures - 595 km for rail/road, 266 km for inland waterways/road and 736 km for short sea shipping/road.
- 3.9 In particular, the study deplores the frequent absence of track and tracing facilities and problems and the fact that it is impossible to use documents in electronic form.
- 3.10 An impact assessment of the 2017 legislative proposal concerning the Directive shows an overall additional cost for intermodal transport solutions of almost 60%, mainly due to implementation, delays, transaction costs, etc<sup>2</sup>.
- 3.11 Clearly, therefore, measures need to be taken to make multimodal freight transport competitive in its own right and to resolve the problems set out above, to achieve efficient and seamless multimodal freight transport flows at the same cost as unimodal transport.
- 3.12 In this context it may also be pointed out that rail needs to adapt better to an open market context and remedy problems due to lack of punctuality, reliability, predictability and flexibility, which obviously have a negative effect on multimodal solutions where rail is involved.
- 3.13 Regarding inland waterways transport, improvements seems to be needed with respect to cross-border transport capacity.
- 3.14 Bottlenecks due to a lack of capacity in multimodal terminals and logistics hubs cause further problems. The Commission Staff Working Paper accompanying the SSM Strategy<sup>3</sup> estimates that distances over 300 km between terminals, such as in Finland, for instance, and in parts of Sweden, are too long, since they limit the possibility of short road legs of about 150 km. While recognising the vital importance of adequate terminal capacity, in particular along the TEN-T Core Network Corridors, it must nevertheless be borne in mind that distance between terminals

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<sup>1</sup> TRT (2017) – Gathering additional data on EU combined transport – Final report.

<sup>2</sup> Commission Staff Working Document, Impact assessment SWD(2017) 362.

<sup>3</sup> Commission Staff Working Document SWD(2020) 331 accompanying the SSM Strategy.

must also be linked to the transport volumes in a region and to differences in the density of the network in different parts of Europe.

- 3.15 Coordination between adjacent Member States of terminal planning in border regions is, on the other hand, essential as a matter of resource efficiency.
- 3.16 It is worth noting in this context that a recent study<sup>4</sup> analysing the effects of cabotage restrictions on combined transport road legs concluded that use of "combi-cabotage" is fairly frequent, due to problems with driver availability and flexibility and cost level differences, and that restrictions on this kind of cabotage may therefore cause certain immediate negative effects for those concerned, including a reverse shift to unimodal road transport and a reduction in rail freight services, whereas in the long term terminal operators believe that improved terminal productivity and services would compensate for possible transport cost increases.
- 3.17 It is also important to consider the consistency of regulations regarding, for instance, handling of dangerous goods between different modes, and that other practical and regulatory issues that may cause difficulties in the interface between modes or in transport between Member States are resolved.
- 3.18 A number of the problems indicated above may be resolved by smart digital solutions. Examples of this are track and tracing possibilities and other digital solutions facilitating the effective management of multimodal transport flows.
- 3.19 Regulation (EU 2020/1056) on electronic freight transport information will facilitate the exchange of regulatory information between operators and authorities on digital platforms as of August 2024 and resolve at least part of the issue of standard documentation and electronic exchange of documents described above.
- 3.20 Hence, there appear to be possibilities for resolving most of the problems set out above that make it difficult for multimodal freight to flourish.
- 3.21 For that to happen, however, adequate terminal infrastructure needs to be provided. As a matter of resource efficiency, it would also be useful for Member States to agree to collaborate on the planning of terminal infrastructure in border regions.
- 3.22 The EESC recommends, with regard to public debt, exempting public investment in multimodal infrastructure from the provisions of the Stability and Growth Pact (SGP) beyond the COVID-19 crisis.
- 3.23 As has already been pointed out, more market-focused behaviour is needed on the part of railways and terminal inland waterways in particular.

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<sup>4</sup> Mobility Package 1 – Data gathering and analysis of the impacts of cabotage restrictions on combined transport road legs TRT Transporti e Territorio SRL.

3.24 If the problems set out above are adequately resolved, multimodal transport will be able to play its full part in the transport system, without dedicated support measures.

Brussels, 7 July 2021

Christa SCHWENG

The president of the European Economic and Social Committee

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