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**Joint Statement by**  
**Inland Navigation Europe, European Barge Union, European Federation of Inland Ports,**  
**European Skippers' Organisation, and Inland Waterway Transport Platform**  
**on the Revision of the Combined Transport Directive**

**Combined transport and inland waterway transport**

**The modal shift can only be multimodal**

Inland waterway transport (IWT) is one of the modes designated and able to absorb higher shares of freight volumes on the European waterways. It is part of the solution to meet the sustainability goals and to keep Europe moving. We therefore welcome the Commission's new endeavour to revise the combined transport directive if it is instrumental to meet the European Green Deal goals for transport in Europe. **However, due to the limited scope of the proposal, which excludes multimodal transport, its effect will be very limited and not be able to support a modal shift to inland waterways.**

**Scope and definitions (articles 1a-1b)**

The scope of the Directive is limited to intermodal transport, i.e. multimodal transport operations moved in the same loading unit between loading and unloading point.

- The fact that multimodal transport (i.e. not in the same loading unit such as bulk, pallets etc.) is excluded from the scope, substantially reduces the relevance of the new Directive for inland waterway transport. Over 80% of goods moved by inland waterway transport are bulk and breakbulk cargo. It indicates that the modal shift potential lies mainly in these market segments for inland waterways. Intermodal transport by inland waterways has and will keep a small share in overall inland waterway transport. In some countries, conditions are not sufficient to allow for intermodal transport services by inland waterways.
- It is a missed opportunity to exclude new freight concepts such as pallets but also very significant volumes of traditional multimodal shipments such as construction materials, waste, outsize transport, renewables etc. which present a high societal burden by road transport in urban areas.
- The reason why the Commission decided to exclude multimodal transport is merely technical. Cargo which is changing vehicles or loading units cannot be traced from origin to destination. Ways to track and trace multimodal shipments in a digital manner from door-to-door are still under development, e.g. with a Unique Identification Link (UIL) for vehicles and their cargo manifest. Modal legs can be tracked and traced, but the entire multimodal operation from origin to destination not yet.
- The Combined Transport Directive aims at implementing the European Green deal which advocates that a substantial part of the inland freight carried today by road should shift onto rail and inland waterways. A purely technical issue should not impeded that the important shift potential in this freight segment, in particular for inland shipping. This limitation of the scope goes against the realization of the European Green Deal modal shift objectives.
- The Commission argues that Member States are free to widen the scope of national aid frameworks, but that would not enhance a level playing field in the EU and lead to fragmentation. Additionally, the planned EU state aid revision will cover multimodal transport and would therefore be misaligned with the Combined Transport Directive.

We propose to extend the scope of the Directive to multimodal transport that complies with the new externality requirements in order to become an instrument that fully contributes to the goal of increasing transport by inland waterways and short sea shipping by 25% by 2030, and by 50% by 2050.

### External cost calculation (article 1c)

- For the external cost calculation, the Commission refers to the Handbook on the external costs of transport published in 2019, where calculations for inland waterway transport are based on old data, there are also some systematic errors resulting in significantly higher external costs for inland waterway transport (almost comparable to road transport) which are not comparable to real costs. The current Handbook contains outdated data for inland waterway transport and requires a review.
- Once the CountEmissionsEU Regulation is adopted, the Commission proposes the calculation of external costs has to take into account the regulation. The current Handbook will also have to incorporate CountEmissionsEU, but this legislative initiative does not take the specifics of inland waterway transport into account. Questions also remain as to how modeling and assumptions of hybrid vessels will be handled.

We recommend to update the dataset for inland waterway transport and to reflect the complexity of external cost calculation for inland waterway transport covering identification and type of vessels, engines, fuel types (combination), nature and weight of cargo and routing of voyages. Generalisation leads to errors and penalisation of inland waterway transport.

### eFTI Platforms (art.3)

The Commission proposes the mandatory use of an eFTI platform for all operations that wish to benefit from the support framework under the new proposal. The obligation to use eFTI platforms – where this is not mandatory for vessel operators under the eFTI regulation 2020/1056- while many unsolved issues remain with regard to the implementation of eFTI, raises questions.

- There are no eFTI Technical Implementation Guidelines yet available with a focus on multimodal and intermodal transport operations whereby transport organisers (e.g. forwarders) and transport operators can use eFTI systems, processes and datasets that are consistent across EU and consistent across multiple modes of transport using the same data elements for RIS and eFTI compliance purposes.
- There is no agreement yet what data will be exchanged with authorities for eFTI compliance and how the process to exchange data will take place.
- There is no detailed specification of the unique ID tag for cargo (loading unit, parcel, vehicle, journey,...), an element necessary for tracking and tracing. Apart from the difficulties to track multimodal operations, tracking of intermodal operations via eFTI has not been finetuned.
- There are already national subsidy schemes existing which cannot be submitted to the requirement of using the eFTI-platform, but which are in line with RIS.
- The undertaking benefitting from the aid under CTD relies on third-party systems/third parties who implement eFTI-platforms.

In order to include multimodal transport operations by inland waterways in the scope of the Directive, We propose that electronic reporting system takes place via the River Information Services (RIS) Platform, as RIS will progressively create links and exchange information with systems and platforms of other modes of transport. The EU funded COMEX2 project and CESNI/TI (European Committee for Standards in Inland Navigation) work on the progressive integration between RIS and eFTI by making the European reporting standard for River Information Services eFTI-ready in the future, for instance a possibility to include a link to an eFTI data set into the RIS electronic reporting data set.

### Cost savings (art. 3a)

One of the big hurdles to increase the use of multimodal transport are the additional transshipment costs when shifting cargo from trucks on inland vessels. Support measures which compensate for these costs make multimodal transport attractive and level the playing field with road transport only. The revision of the current State Aid Railway Guidelines into Multimodal State aid Guidelines and the Transport Block Exemption Regulation are expected to provide an important framework to the Member States. This should however be aligned with the Combined Transport Directive.

The cost savings provision of 10% may be difficult to attain as it requires higher state subsidies which may not be available. We propose that higher costs for multimodal transport are compensated without requiring a fixed 10% cost savings. We therefore propose to delete article 3a.2(a).