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### **FEPORT Position - Amending of Directive 92/106/EEC regarding Combined transport of goods between Member States**

[FEPORT](#), the European organisation representing the interests of private port companies and terminals located out of the sea ports of the European Union, welcomes the Commission revision of the Combined Transport Directive. FEPORT members are primarily responsible for port operations, but also operate privately owned combined transport terminals throughout the European Union.<sup>1</sup> FEPORT members also have a vested interest in promoting multimodal transport in the direct port hinterland.

The initial aim of Directive 92/106/EEC was to ensure optimum management of the Unions resources by enhancing intermodality and, in particular, ensuring a reduction of cargoes travelling solely by road. According to the directive's third recital, combined transport should be perceived as an alternative to road transport, especially because of increasing problems related to road congestion, the environment and road safety.

The existing directive defines **combined transport** as **transport of goods** between Member States where a freight road transport is used on the initial or final leg of the journey, and rail or inland waterway or maritime services are used for the other leg, with the '**non-road**' **transport section having to exceed 100 km**. Furthermore, the initial or final road transport leg of the journey must be between the point where the goods are loaded/unloaded and the nearest suitable rail loading station for the initial/final leg, or within a radius not exceeding 150 km from the inland waterway port or seaport of loading or unloading (Article 1).

FEPORT like other stakeholders organizations sees in the revision of the Directive an opportunity to unleash the potential of **combined transport** (i.e. a multimodal transport where a major part of journey is carried out by rail, inland waterways or sea and the initial and final part is carried out by freight road transport).

The discussion about combined transport should be seen as a means to tackle the issue of the optimization of the performance of multimodal logistic chains by promoting the use of the most efficient transport mode. Harmonization of technical requirements, use of digital innovation and level playing field between modes (for instance; in terms of infrastructure charges) will be important topics to be tackled.

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<sup>1</sup> For example, [MCT Moerdijk terminal, Netherlands](#); [Dunajska Streda terminal, Slovakia](#); [Milan-Melzo, Italy](#), [TCT Terminal, Belgium](#),

## **Terminal Investment**

The revision of the Directive needs to support the development of terminals where there is not already an existing market. Where there is an existing market, the objective should be to increase the operational efficiency of existing terminals rather than to focus on terminal development.

Where there is existing undercapacity, the objective should be the expansion of existing facilities. State support for the construction of new terminals should be used only where there is not an existing market for combined transport operations. The Directive needs to ensure that we do not create a situation whereby new terminals are developed with financial support which compete directly with neighbouring terminals without financial support, thereby creating competition distortion and possible overcapacity.

As indicated in Recital 13, one of the main barriers to combined transport is infrastructure bottlenecks. This often includes connections to a terminal. Member States should work to ensure that hinterland bottlenecks are removed around terminals, thereby making combined transport operations more attractive.