

Sector Position

Brussels, June 2026

Combined Transport Directive (CTD): A Pragmatic Plan as the way forward

Do not withdraw the CTD proposal — the sector has a solution

The undersigned organisations call on the European Commission and EU Transport Ministers not to withdraw the proposal revising the Combined Transport Directive.

Combined Transport is essential for Europe's competitiveness, decarbonisation, energy security, supply-chain resilience and military mobility. Withdrawing the CTD proposal would send the wrong political signal and delay urgently needed improvements for many more years.

A pragmatic way forward is available.

The sector suggests to:

- **keep the current Combined Transport definition** under Directive 92/106/EEC;
- **continue to work on the rest of the proposal now**, to achieve the urgently needed modernization wherever agreement is possible;
- **consider the technical proposals** in the annex as a basis for advancing National Policy Frameworks, digitalisation, transparency, terminal and last-mile support, and targeted driving-ban exemptions.

This approach would avoid a political failure, preserve momentum on Combined Transport, and allow EU institutions to deliver concrete improvements for modal shift, intermodal competitiveness and European resilience.

The sector stands ready to support the Commission, the Council and the European Parliament in advancing this pragmatic solution.

Signatories



Association of European
Rail Rolling Stock Lessors



Community of European
Railway and Infrastructure
Companies



European Rail Freight
Association



International Union of
Wagon Keepers



International Union for
Road-Rail Combined
Transport



European Rail Supply
Industry Association

ANNEX: Combined Transport: A Key Enabler of Europe's Competitiveness, Energy Security and Resilience

Combined Transport (CT) is a cornerstone of a sustainable, competitive and resilient European freight transport system. By combining road with rail, inland waterways and short sea shipping, CT reduces both carbon and pollutant emissions as well as energy use while strengthening supply chains. In the context of growing geopolitical and energy security challenges, it also reduces Europe's dependence on fossil fuels. CT infrastructure and assets – such as terminals, wagons, intermodal loading units and the intermodal rail freight network – also offer significant dual-use potential, reinforcing Europe's strategic resilience and crisis preparedness. CT also plays a key role in addressing the European truck driver shortage by shifting long-haul transport of every type of cargo carried in trucks to rail, enabling the road transport sector to focus on high-value, regional and 'last-mile' operations.

Door-to-door Combined Transport is the most effective alternative to unimodal road transport and a key enabler of resilient European logistics systems. CT has extended access to rail freight across the logistics sector, including for operators that would otherwise not be able to use rail transport. Despite the overall declining rail freight market share, intermodal rail freight has been the main growth segment over the past 25 years, preventing a further even greater decline in rail freight's modal share. Between 2010 and 2023, CT volumes grew by 59%, whereas between 2018 and 2023 intermodal volumes increased by 8.7% while total rail freight declined by over 8%. This confirms intermodal rail freight as the fastest-growing rail freight production system and simultaneously demonstrates its resilience. Today, CT accounts for at least one third — and up to around 50% — of total rail freight tonne kilometres performed in Europe, thus making it a backbone of the European transport system. Close to 90% of CT tonne-kilometres are realised over cross-border relations, underlining the essential role of CT for the Single Market and European supply chains.¹ However, the growth of intermodal rail freight has recently slowed (Winning Intermodal, Wyman, 2025). **Against this backdrop, withdrawing the revision of the CT Directive would be particularly damaging.**

The proposed revision of the CT Directive, published by the European Commission in November 2023, is currently blocked, primarily due to disagreements on the proposed CT definition based on external cost savings (Article 1c, 2023/0396 COD). While conceptually valid, this approach has proven too complex politically, with neither the European Parliament nor the Council able to establish a position. As a result, the European Commission has announced its intention to withdraw the proposal.

Withdrawing the Commission's amendment proposal would have serious consequences. CT is presently expected to continue growing by around 3% annually, or roughly double the rate of the EU GDP, until 2040. According to Oliver Wyman, the market for CT services may expand by as much as two-thirds, if supported by an enabling regulatory framework. In this context, a failure to continuing the revision of the CT Directive (CTD) would undermine the EU's objective to increase the market share of rail freight. Moreover, a withdrawal of the CTD would further distort the level playing field between modes of transport, particularly if other proposals such as the Weights and Dimensions Directive are allowed to proceed. It would create a prolonged period of regulatory uncertainty, effectively freezing investments in terminal infrastructure, fleet modernization and digitalisation that are critical for Europe's industrial competitiveness. This would also weaken Europe's ability to respond to ongoing energy security and geopolitical challenges by increasing reliance on fossil fuel-intensive road transport. It would further undermine the development of dual-use infrastructure and intermodal rail freight services relevant for Military Mobility and Europe's resilience. Given that previous attempts to revise the CTD have already failed, another failure risks delaying progress on CT for many more years, at a time when accelerated action would be urgently needed.

In light of the above, instead of withdrawing the Commission proposal 2023/ 0396 COD, the sector recommends that the EU co-legislators pursue a pragmatic way forward: retain the current CT definition under Directive 92/106/EEC, which would remain in force even in case of a withdrawal, and resume negotiations on key elements where agreement can be reached, with a commitment to review the CT definition in five years once key conditions are in place.

¹ https://uic.org/IMG/pdf/uic_uirr_report_2024-2.pdf

Key Actions to implement a Pragmatic Plan

Building on the above, the following steps are proposed to operationalise this Plan and ensure its effective implementation. This approach focuses on preserving the current CT definition while advancing those elements of the Commission proposal where agreement is achievable.

1. The proposal must not be withdrawn.

A withdrawal would deprive Europe of crucial improvements in intermodal, resilient and sustainable freight transport. Given its direct impact on CT competitiveness, consideration should be given to temporarily pausing the revision of the Weights and Dimensions Directive to allow the CTD to catch up. The objective should be a simultaneous approval of both directives, guaranteeing compatibility and interoperability between the modes, while preventing measures that would cause market distortions.

2. The EU co-legislators should agree to retain the current CT definition as set out in Article 1 of Directive 92/106/EEC, complemented by a review clause requiring the European Commission to present a targeted revision of the definition after 5 years, once key framework conditions – such as the External Cost Handbook and the full implementation of electronic freight transport information (eFTI) framework – are in place.

The concept of external cost savings should be retained for future consideration, with any future revision to be based on a simple, robust and evidence-based methodology, including appropriate safeguards to prevent reverse modal shift.

3. EU institutions should resume work on key remaining elements.

- **National Policy Frameworks (NPFs):** NPFs are essential to address persistent cost and efficiency barriers in Combined Transport and to create the necessary framework conditions for modal shift.

NPFs should ensure binding, competitiveness-increasing cost reductions through simultaneous infrastructure and operational improvements, and effective support for terminal development, last-mile connections, as well as operational cost reductions, including the option to reduce or even waive road tolls for CT road legs (first and last mile on the road) to and from combined transport terminals, with the objective of accelerating modal shift.

These targets should be proposed in a pragmatic and flexible manner that enables adherence to local peculiarities to ensure the support of Member States. If agreement on binding cost-reduction targets is not possible, an alternative could be to introduce annual modal shift targets within the NPFs supported by market-based instruments such as carbon- and energy-saving certificates and military mobility stand-by contracts, in line with the recommendations of the European Court of Auditors².

Member States should also be encouraged to make effective use of existing EU funding and support instruments, including where relevant state aid frameworks, to support Combined Transport investments and improve framework conditions.

Consideration could also be given to encouraging Member States to frame their NPFs around broader transport policy objectives such as the reduction of road congestion, greenhouse gas emissions, road accidents, or fossil fuel use, while retaining flexibility in the choice of measures to achieve them, including through modal shift and CT.

- **Digitalisation:** eFTI provides the digital mechanism for exchanging and presenting the information required under the Combined Transport Directive and can support more efficient enforcement and data-driven policymaking; its implementation for combined transport should therefore be aligned with the CTD, the Telematics TSI and other relevant systems, be cost-efficient and user-friendly, clearly allocate responsibility for data submission, and be

² Special Report 08/2025: Intermodal Freight Transport – EU Still Far from Getting Freight off the Road

complemented by standardised identification of intermodal loading units and improved transparency of national policy frameworks and support measures.

- **Transparency and market access:** improve transparency and market access through enhanced and connected digital information tools. Strengthen the EU intermodal information gateway by providing clear visibility on national measures, support schemes and regulatory conditions. Improve the availability of information on terminal services and capacities. Assess the feasibility of digital platforms displaying available CT services (e.g. train/vessel capacity and schedules). This would reduce entry barriers and improve capacity utilisation.
- **Driving-ban exemptions:** while supporting truck driving bans as a key tool of transport policy, we support exemptions for CT road legs, with targeted safeguards to protect rail freight competitiveness and avoid misuse. These exemptions should focus on terminal productivity and infrastructure utilisation, while being applied in a pragmatic manner that takes into account operational constraints, such as restricted opening hours of terminals in some urban areas.

They should not apply where clear rail alternatives exist (e.g. in some port hinterland relations) or to pure transiting road legs, ensuring that long-distance transport remains on rail or waterborne modes. Strict implementation and enforcement are essential to prevent fraudulent use and to ensure that the 'last-mile road leg' remains a supportive tool for rail rather than a loophole for long-haul road transport.

This Plan represents the only realistic path to avoid a policy failure that would further weaken Europe's modal-shift and resilience ambitions, and to deliver concrete improvements for Combined Transport.

Besides, the sector stresses that, in addition to the revision of the CTD, there is an urgent need to adopt a genuine and comprehensive European strategy strengthening rail freight, including both conventional rail freight and Combined Transport, recognising its essential contribution to decarbonisation, industrial competitiveness, supply chain resilience and Europe's strategic autonomy.

The sector stands ready to work with EU institutions and provide its expertise to support both, the timely and effective advancement of the Combined Transport Directive revision, and the development of a broader European strategy to strengthen rail freight.