

Combined transport in the EU

Fields marked with * are mandatory.

Please provide information to help us build your profile as a respondent. In accordance with [Regulation 45/2001](#), all personal data collected through this survey will be kept securely and will ultimately be destroyed.

Please note that the questionnaire will only use your full contribution if your name, organisation (if you answer on behalf of an organisation or institution) and contact details are provided.

If you choose to **not** provide your name, organisation and contact details, you have the option of submitting a general comment only.

If you **do** choose to provide us with your name, organisation and contact details, you can still opt for your answers to remain anonymous when results are published.*

- Yes, I will provide my name and contact details
- No, I prefer to provide a general comment only

A. Respondent details

1. First name*

Jean-Marie

2. Last name*

Millour

3. Organisation*

BP2S / Shortsea Promotion Centre France

4. Address*

47 rue de Monceau

5. City*

Paris

6. Country*

- Belgium
- Bulgaria
- Czech Republic
- Denmark
- Germany
- Estonia
- Ireland
- Greece
- Spain
- France
- Croatia
- Italy
- Cyprus
- Latvia
- Lithuania
- Luxembourg
- Hungary
- Malta
- Netherlands
- Austria
- Poland
- Portugal
- Romania
- Slovenia
- Slovakia
- Finland
- Sweden
- United Kingdom
- Other

7. Email address*

shortsea@shortsea.fr

8. Contributions received from this survey may be published on the European Commission's website, with the identity of the contributor. Do you agree to your contribution being published under your name?*

- My contribution may be published under the name indicated
- My contribution may be published but should be kept anonymous
- I do not wish any of my contributions to be published

9. Are you completing this survey as an individual, or on behalf of an organisation or an institution?

SME: less than 250 employees or turnover below or equal to €50m or balance sheet total below or equal to €43 m

*Large enterprise: anything bigger than SME, ie more than 250 employees, turnover over €50m or balance sheet total above €43m**

- I am answering as an individual
- I am answering on behalf of a large company
- I am answering on behalf of an SME company
- I am answering on behalf of a business organisation
- I am answering on behalf of a Non-Governmental Organisation
- I am answering on behalf of a public authority

10. Please indicate if your organisation is registered in the [Transparency Register](#) of the European Commission.

- Yes
- No

11. Please enter your registration number in the Transparency Register

*(numbers only)**

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B. Objectives of the CT Directive

The CT Directive was issued in 1992, in order to liberalise Combined Transport services in the EU and to stimulate their use, with the aim of reducing road congestion and negative environmental impacts.

1. Are you aware of the existence of the CT Directive?*

- Yes
- No

2. Has the CT Directive helped you in your business?*

- Yes
- No

3. The CT Directive contains a number of Articles, which set out provisions for individual Member States to promote use of Combined Transport.

Please assess below whether any of these provisions, as listed below, make you more or less likely to provide Combined Transport services, or use Combined Transport services?

	More likely	No difference	Less likely	I don't know
Liberalisation of Combined Transport operations from all quota systems (Article 2)*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Liberalisation of Combined Transport operations from authorisation (Article 2)*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Liberalisation of road cabotage for Combined Transport operations, i.e. eligible hauliers established in any Member State have the right to carry out initial and/or final road haulage legs in any Member State which form an integral part of the Combined Transport operation and which may or may not include the crossing of the border (Article 4)*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction or reimbursement of taxes for road vehicles in the country where the vehicles are registered, when these vehicles are transported by rail in Combined Transport operations (Article 6.1)*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possible exemption from taxes for road vehicles used exclusively in feeder or final delivery of Combined Transport operations (Article 6.2)*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Initial or final road haulage legs forming part of Combined Transport operations exempted from compulsory tariff regulations (Article 8)*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The ability for the dispatching or receiving party to haul a third-party trailer or semi-trailer by road at either end of a Combined Transport operation as an "own-account" operation (Article 9)*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6. What are in your view the advantages or disadvantages created by the CT Directive?

Avantages : a permis le développement du transport combiné / a encouragé le report modal, exonération de la taxe à l'essieu mais pas suffisamment large (pas suffisamment d'exonération de taxes dans le cadre du transport combiné) **Inconvénients :** définition trop rigide, trop restrictive, peu ou mal adaptée à certaines opérations (surtout TMCD/shortsea)

7. Do you believe that the CT Directive has achieved its objectives of encouraging modal shift away from road and associated reduction in road-related impacts?*

- Yes
- No
- I don't know

8. In your view, do you think it would have been possible to achieve the same objectives with less burdensome/less costly measures?*

- Yes
- No
- I don't know

8a. Please clarify why or how?

Le transport combiné pourrait s'être davantage développé avec moins de contraintes et de « paperasse » ainsi qu'accompagné par le développement d'outils tel que le 45'PW

10. Do you consider that the CT operations would be economically viable/competitive without the CT Directive?*

- Yes
- No
- I don't know

12. In your view, should the EU continue supporting CT operations or not?*

- Yes
- No
- I don't know

13. Please clarify why or how?

Parce que sans directive, il n'y aurait pas véritablement d'aide au transport combiné. Celui-ci étant plus cher et plus « compliqué » que le transport routier intégral, il n'est pas compétitif sans aide ni soutien. Ce soutien doit être multiforme : financier, fiscal, réglementaire, etc.

C. Definition of Combined Transport (Article 1 of the CT Directive)

The definition of “Combined Transport” in the CT Directive currently limits the scope to transportation of goods between Member States, where the goods are carried in a load unit (lorry trailer or semi-trailer with or without the tractor unit, a swap body or container of 20 feet or more in length) by a combination of road and rail, inland waterway or maritime transport which meets the following criteria:

- Rail or inland waterway or maritime transport - where this section exceeds 100km as the crow flies; and
- Road transport on the initial and/or final leg of the journey – either:
 - between the point where the goods are loaded and/or unloaded and the nearest suitable rail loading station; or
 - within a radius of 150 km as the crow flies from the inland waterway port or seaport of loading or unloading.

1. Do you consider the definition in the CT Directive relevant and appropriate and hence would not change it if the CT Directive were to be revised?*

- Yes, I consider it relevant and appropriate and it should not be changed
- No, I consider the definition should be reviewed
- I don't know

2. The CT Directive limits the scope of Combined Transport to the transport of goods between Member States. If the Directive were to be revised in future, should the scope be extended to include either of the following?

- Domestic Combined Transport operations (ie those **within** one Member State)
- International Combined Transport operations between an EU Member State and third countries (ie those **outside** of the EU)
- The Directive should continue to apply to transport between Member States

3. If the Directive were to be revised in future, which types of load units should be covered within the definition of "Combined Transport"?

	<20' (<6m)	20-40' (6-12m)	45' (13.6m)	>45' (>13.6m)
Maritime Container 8' wide standard (2352mm internal)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Maritime Container 8' palletwide (2426mm internal)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
European Container 2.5 – 2.6m wide	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Swap Body 2.5 – 2.6m wide	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Semi-trailer Piggyback / Huckepack (craneable)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Semi-trailer Standard (non-craneable)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Tractor & semi-trailer Tractor & drawbar trailer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

3a. If you selected either <20' or >45', which specific lengths of load unit do you think the CT Directive should consider?

<20' pour la livraison urbaine >45' pour les 53' et ensembles routiers 25m25

4. The CT Directive refers to Combined Transport operations involving a combination of road legs with rail / inland waterway / maritime legs.

If the CT Directive were to be revised in future, which of the combinations of modes should it cover?

- Rail and road legs
- Inland waterway and road legs
- Short-sea shipping (where an alternative road transport link exists, eg the Øresund crossing) and road legs
- Short-sea shipping (where no alternative road transport link exists eg to/from islands) and road legs
- Ocean transport and road legs
- Air transport and road legs

5. At present the CT Directive only includes specific provisions on **bi-modal** combinations (eg road + rail, road + sea, road + inland waterway).

Do you believe that the CT Directive should also include specific provisions for **tri-modal** (or more) combinations (eg sea + rail + road)?

Absolument. Ainsi que le bi-modal et tri-modal sans route (ex. mer + rail)

6. The CT Directive provides different requirements for the extent of the road leg for Combined Transport operations, depending on the combination of modes involved:

* Rail + Road: Nearest suitable loading station

* Inland Waterway + Road or Sea + Road: 150km from the inland waterway port or seaport

Do you think that these provisions should be reviewed?*

- Yes
- No
- I don't know

7. Do you think that the conditions for road leg should be the same across all combinations of Combined Transport?

*

- Yes – should be the same
- No – should be different
- I don't know

8. Do you think the road leg should be limited to an exact kilometer distance or to nearest suitable loading station?*

- Limited to exact distance
- Limited to nearest suitable loading station
- Limited to nearest suitable loading station, but not further than a certain distance
- I don't know

9. If you think that the road leg should be limited by distance, what would be your preferred choice of measure?*

- Distance as the crow flies (ie a straight line)
- Distance driven by road (using appropriate motorways and major roads)
- Distance by road as a percentage of the total Combined Transport journey

10. If you think that the road leg should be limited by distance, what should this distance be?

Note that the road leg distance could be limited either by minimum or maximum kilometres or by percentage of the total journey or by combination of the two.

Nous ne souhaitons pas de limitation. Mais s'il doit y en avoir une, elle ne doit pas aboutir à ce qu'une partie prenante renonce à utiliser le transport maritime à courte distance sur certains segments parce que la part routière du TC excéderait les limites fixées par une directive. Il vaut toujours mieux un transport combiné mer + route, quelles que soient les distances ou proportions de chaque segment, plutôt qu'un transport routier intégral (porte à porte). Nous consulter pour explication complémentaire.

11. How should "suitable" best be defined?

- Availability of handling facilities (eg cranes, storage space)
- Availability of rail/inland waterways/maritime services (eg on relevant routes for connecting journey)
- Frequency of rail/inland waterways/maritime services (eg weekly, daily connecting services)
- Quality of the terminal services

12. If you think the quality of the terminal services should be taken into account for "suitable", how should "quality" be assessed or measured?

Fréquence, disponibilité, fiabilité, compétitivité (notamment au niveau coût)

13. Do you have any other comments on the definition of CT?

Quelle différence avec la définition du transport intermodal, multimodal, comodal, etc. ?

D. Authorisation schemes (Article 2 of the CT Directive)

1. If you are a user or operator of Combined Transport services, have you encountered any authorisation schemes (licences, permits, registration requirements etc) for combined transport?

- Yes
- No

2. If you are a user or operator of Combined Transport services, have you encountered any authorisation schemes or other limitations (licences, permits, registration requirements, approved lists of terminals, approved lists of providers etc) for operations influencing combined transport?

- Yes
- No

E. Transport documentation (Article 3 of the CT Directive)

In the case of Combined Transport for hire or reward, a transport document is required to provide evidence that the road leg is being performed as part of a Combined Transport operation, specifying details of the rail station, inland port or sea port used for delivering or picking up a load unit. The details relating to this operation must be confirmed by the respective authority(s) by means of a stamp after the relevant leg has been carried out.

1. Do you consider the conditions for documentation in the existing CT Directive cause any problems for the Combined Transport services?

- Delay
- Additional cost
- Other

2. If the documentary evidence of the Combined Transport journey could be available by other means, which of the following documentation / channels do you consider could replace the current documentation?

Please rate from 1 (Not effective) to 5 (Very effective)

	1	2	3	4	5	I don't know
Evidence by mode-related waybill without stamp*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establishment of a single transport document for all Combined Transport operations*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other electronic clearing system*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Please list any other documentation / channel options that the CT Directive should consider?

4. Do you have any other comments on the transport documentation of CT?

Un Document Unique de transport avec un régime de responsabilité uniforme pour le transport combiné/intermodal/multimodal (type e-CMR par ex.).

F. Cabotage (Article 4 of the CT Directive)

According to Article 4 of the CT Directive, all road hauliers established in a Member State who meet the conditions of access to the occupation and access to the market for transport of goods between Member States shall have the right to carry out, in the context of a Combined Transport operation between Member States, initial and/or final road haulage legs which form an integral part of the Combined Transport operation, and which may or may not include the crossing of a frontier. Essentially, this provision exempts Combined Transport operations from the limitations on road transport cabotage.

When this provision was established, cabotage was generally prohibited in the EU. [Regulation \(EC\) 1072/2009](#) now establishes a general framework for road cabotage in EU whereby every haulier is entitled to perform up to three cabotage operations within a seven-day period, starting the day after the unloading of the international transport, however this limitation does not apply to combined transport operations as per Article 4 of the CT Directive.

In this section below, we would like to know your views on the implementation of road transport cabotage liberalisation for Combined Transport operations, and how or if the CT Directive could be improved in this area.

1. How far would you agree with the following statements on cabotage within the CT Directive?

	Yes	No	I don't know
Combined transport operations are completely free from cabotage restrictions*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Combined transport operations are partly free from cabotage restrictions*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The same rules apply to Combined Transport operations as to non-Combined Transport operations*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Different rules apply for different combinations of modes in Combined Transport operations*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Different rules apply for accompanied and unaccompanied Combined Transport services*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The application of cabotage rules on Combined Transport is inconsistent*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. If you have encountered problems with any of these statements in particular Member States, can you please clarify in which Member States you have encountered and which problems?

3. In your view, does the cabotage liberalisation for CT operations create labour market/social problems in the Member States?

- Yes
 No
 I don't know

4. In your view, should the cabotage liberalisation for CT operations be continued if the Directive were to be reviewed?

- Yes
 No
 I don't know

5. Do you have any other comments on the cabotage liberalisation of CT operations?

Cette libéralisation doit se faire dans un objectif de transport maritime sans barrière et dans la perspective d'un espace européen de transport sans barrière ; et elle doit favoriser les logistiques multimodales.

G. Financial incentives in Combined Transport operations

The CT Directive provides two types of financial incentives for vehicles engaged in Combined Transport, namely:

- **Reduction or reimbursement of taxes for road vehicles in the country where the vehicles is registered, when these vehicles are transported by rail in Combined Transport operations (Article 6.1);**
- **Exemption from taxes for road vehicles used exclusively in collection or final delivery of Combined Transport services (Article 6.2).**

1. How far would you agree with the following statements on fiscal incentives within the CT Directive?

	Yes	No	I don't know
Road vehicle tax reductions are available for road vehicles used in Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Road vehicle tax reimbursements (refunds) are available for road vehicles used in Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Road vehicle tax exemptions are available for road vehicles used exclusively for road leg in Combined Transport operations*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fiscal incentives apply to road + rail Combined Transport services not limited to the distances stated in the CT Directive*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reductions or reimbursements of vehicle tax apply to road vehicles in Combined Transport operations that are not limited to use on Roll-on, Roll-off rail services*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Exemptions of vehicle tax apply to road vehicles that are not used exclusively for the Combined Transport road leg, but also carry out other road transport services*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

2. If you have encountered problems with any of these statements in particular Member States, can you please clarify in which Member States you have encountered and which problems?

3. Are you aware of any other fiscal incentives relating to road vehicles used in Combined Transport?

- Yes
- No

4. Do you have any other comments on the fiscal incentives provided for in CT Directive?

H. Improving knowledge of the Combined Transport sector

At present the volume and quality of statistics related to Combined Transport movements in the EU is not sufficient, which impacts on the ability of Member States and the EC to assess the operation of the Combined Transport market.

The next set of questions relate to the opportunity to improve the understanding of the Combined Transport market, and the extent to which you might have, and be prepared to share, any relevant non-commercially sensitive data.

1. Do you agree with the need to obtain better data on the Combined Transport market to provide a better understanding of its operations, challenges and opportunities?*

- Yes
- No
- I don't know

1a. Please explain

Une base de données de toutes les solutions et combinaisons en transport combiné

2. Do you gather information on Combined Transport movements as part of your normal business operations?*

- Yes, mainly electronically
- Yes, mainly paper based
- No

3. Would you be willing to collect or start to collect any of the following types of information (at least annually)?

	Already collect	Willing to collect	Not willing or unable to collect
Ultimate origin (ie where the goods were loaded into the load unit)*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ultimate destination (ie where the goods will finally be unloaded)*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Last change of mode (ie where the load unit has just come from)*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Next change of mode (ie where the load unit is going next)*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Full journey of the load unit, including origin, destination and changes of mode en route*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Load unit registration number*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Type of load unit (eg container, swap body, piggyback trailer)*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Dimensions of load unit (eg height, length, width)*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Weight of load unit (eg tare, net payload, gross)*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

4. Which of these would you be prepared to report regularly (assuming appropriate solution has been found for safeguarding commercially sensitive data)?

	I am prepared to report	I am not prepared or I am unable to report
Ultimate origin (ie where the goods were loaded into the load unit)*	<input type="radio"/>	<input checked="" type="radio"/>
Ultimate destination (ie where the goods will finally be unloaded)*	<input type="radio"/>	<input checked="" type="radio"/>
Last change of mode (ie where the load unit has just come from)*	<input type="radio"/>	<input checked="" type="radio"/>
Next change of mode (ie where the load unit is going next)*	<input type="radio"/>	<input checked="" type="radio"/>
Full journey of the load unit, including origin, destination and changes of mode en route*	<input type="radio"/>	<input checked="" type="radio"/>
Load unit registration number*	<input type="radio"/>	<input checked="" type="radio"/>
Type of load unit (eg container, swap body, piggyback trailer)*	<input type="radio"/>	<input checked="" type="radio"/>
Dimensions of load unit (eg height, length, width)*	<input type="radio"/>	<input checked="" type="radio"/>
Weight of load unit (eg tare, net payload, gross)*	<input type="radio"/>	<input checked="" type="radio"/>

5. Do you have any other comments on collection of data on CT operations?

Le moyen le plus simple de collecter les données reste le Document Unique de transport (dématérialisé)

I. Boosting freight transport by alternative modes

The EC's **2011 White Paper on Transport** (Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system) noted a number of areas where improvements would be required to the transport system for freight.

Taking account of the current situation for Combined Transport and the measures proposed in the 2011 White Paper on Transport, this section seeks to capture your views on the relative importance of those measures which could be progressed, either by the EC, Member States or private-sector stakeholders, to increase the use of Combined Transport within the EU.

1. Do you consider that the CT Directive should be reviewed to further boost Combined Transport?*

- Yes
- No
- I don't know

2. If the CT Directive were to be revised in future, which areas of the CT Directive would most help increase the use of Combined Transport within the EU?

Please rate from 1 (Least relevant) to 5 (Most relevant)

	1	2	3	4	5	I don't know
Increase in the range of load units included in the definition of Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase in the road leg distance included in the definition of Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Decrease in the road leg distance included in the definition of Combined Transport*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonisation of administrative procedures among Member States*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Exemption from road driving bans*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Further fiscal incentives beyond the current provisions*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Beyond the provisions of the CT Directive, how far do you consider the following issues to be of importance to increasing the use of Combined Transport within the EU?

Please rate from 1 (Low importance) to 5 (High importance)

	1	2	3	4	5	I don't know
Cost of Combined Transport against equivalent door-to-door road haulage*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of Combined Transport against equivalent door-to-door road haulage*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Speed of Combined Transport against equivalent door-to-door road haulage*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of road leg in Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of non-road leg in Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of road leg in Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of non-road leg in Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cost of interchanges in Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Quality of interchanges in Combined Transport*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Availability of Combined Transport services*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Availability of Combined Transport interchanges*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Coordination within Combined Transport chain*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Awareness of Combined Transport operations*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Data on Combined Transport operations (eg traffic and/or performance statistics)*	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Are there other issues which you consider important to increasing the use of Combined Transport within the EU?

- internalisation des coûts externes - davantage de contraintes/restrictions pour le transport intégralement routier - mise en place d'un système d'aide/dispositif de soutien à la demande de transport (type Ecobonus en faveur du TMCD/shortsea) - prise en compte du transport bi ou tri-modal hors segment routier

5. What other incentives do you think would make the most difference to the increased use, or provision, of Combined Transport in the EU?

Please rate from 1 (Least relevant) to 5 (Most relevant)

	1	2	3	4	5	I don't know
Reduction/reimbursement of infrastructure access charges for rail and inland waterways*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Longer articulated road vehicles for moving Combined Transport load units to/from rail, inland waterway and sea terminals*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fiscal incentives to encourage investment in Combined Transport load units*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fiscal incentives to support start-up phase of new multi-user Combined Transport services*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Expedited process to speed up approval of development for new terminals*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6. Are there other incentives which you consider important to increasing the use of Combined Transport within the EU?

Incitation à la demande de transport intermodal/combiné (comme système d'Ecobonus italien) au niveau européen (harmonisé/coordonné)

7. Do you have any other comments incentives to boost combined transport?

Favoriser le développement et l'utilisation de l'UTI 45 pieds PalletWide (45'PW) en transport intermodal/multimodal/combiné intra-européen à segment maritime et/ou fluvial.

J. General comments

1. Any other relevant matter not covered by the above questions you would like to bring to our attention

Lors de la mise en place de la directive (en 1992), le nombre de pays dans l'Union Européenne était beaucoup moins important qu'aujourd'hui, avec des distances donc moins grandes entre ces pays. De plus, cette directive a été conçue dans une optique essentiellement rail-route, le TMCD/shortsea n'était pas encore une priorité de l'Europe et le 45'PW n'existait pas encore. Le texte de la directive est donc aujourd'hui à revoir parce que devenu obsolète. Nécessité également d'avoir un véritable espace européen de transport sans barrière, pour tous les modes de transport et pour toutes les combinaisons de modes de transport. La version en ligne ne permettant pas toujours de préciser nos réponses, nous vous joignons notre réponse préparée avec nos membres sur la base de la version PDF du questionnaire. Ceci étant, nous restons à votre disposition pour tout complément ou précision éventuelle.

2. Please upload any supporting files

1. [3fba4a45-4a3d-4524-851c-e302eaebb06e/RéponseBP2S_ConsultationUE-transportcombiné_2.pdf](#)