

**Från:** [Stefan Back](#)  
**Till:** [Christina Gisselberg](#)  
**Ärende:** VB: intermodal  
**Datum:** den 1 september 2021 11:05:48  
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Hej! Vet inte om eller när det svar på konsultationen som jag just skickat in kommer som kopia. Om inte, kopierade jag texten nedan.

SB

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**Skickat:** den 1 september 2021 10:54  
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**Ämne:** inter

Inläggets referens  
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#### [Hållbara transporter – översyn av direktivet om kombinerad transport](#)

Transportföretagen shares the view of the European Economic and Social Committee in its opinion on Intermodal transport and multimodal logistics – making modes complementary in greening transport, adopted with broad support on 25 March 2021 (TEN/747) that 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 expensive, slower and less reliable than, in particular, unimodal road transport. We underscore that efficient and sustainable multimodal transport and logistics cannot be built with financial promotion or regulatory support.

We particularly draw attention to the need to resolve the following problems.

- Additional costs due to transshipment and additional transaction costs
- Long delivery times
- Complexity
- Higher risk
- Lower reliability
- Higher rail efficiency including better punctuality, reliability, predictability and flexibility
- The need for more adequate terminal infrastructure including better coordination between Member States regarding planning of terminal infrastructure in border regions

We also draw attention to the need to ensure that regulatory and practical issues that cause

difficulties in the interface between modes or in transport between Member States are addressed and resolved. We think that a number of the problems hampering the development of multimodal transport could be resolved by smart digital solutions that could facilitate management of multimodal transport flows. In this context for instance Regulation (EU) 2020/1056 on electronic freight transport information could improve the flow of multimodal transport by facilitating the exchange of regulatory information between operators and authorities.

A number of the problems described above are mentioned in the Impact Assessment. We regret that no other solution is proposed than various support policy options, instead of looking at the possibilities to resolve the real problems and find ways to make multimodal transport competitive in its own right. This in our view is the only viable long-term solution. For information, we enclose the EESC opinion mentioned above.