

CLECAT IS THE LEADING VOICE OF FREIGHT FORWARDING, LOGISTICS AND CUSTOMS AT THE EU LEVEL IN BRUSSELS



CLECAT works to create a favourable business climate in Europe for its members. We support and represent the interests of companies in the freight forwarding, logistics and customs sector. CLECAT is an authoritative discussion partner for policymakers, politics, supply chain partners and other societal stakeholders in the field of transport and logistics.

in this position, it is vital that the sector responds well to the challenges but also that EU policy underpins important changes and provides the necessary means to transform the logistics sector into an engine of growth. The best way to do this is to support the sector through smart integration of policy measures related to climate change, innovation, skills, infrastructure and trade policy. This contributes to strengthening Europe's competitive position which is crucial for economic growth, innovation, and the overall well-being of the EU.

In this publication, CLECAT sets out its priorities and recommendations for the future of EU transport policy in the new political cycle after the 2024 European elections.



Our aim is to contribute to the sustainable development of the sector in Europe with the support of our members. The logistics sector is one of the sectors in which Europe excels, also globally. To maintain

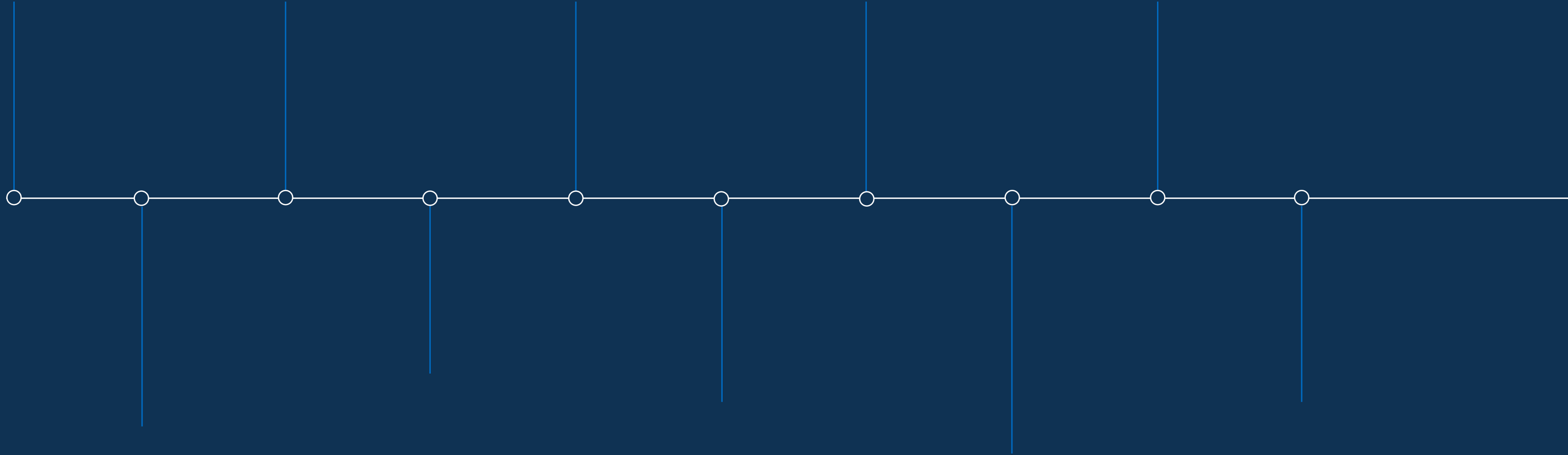
We represent and are supported by

25

member organisations working to promote a sound approach to transport and logistics across Europe, in support of the competitiveness of our industry.



PRIORITIES & RECOMMENDATIONS



1

RECONSIDER REGULATORY STRATEGIES

Despite suggestions that supply chains will become more regionalised in the future, globalisation is likely to remain a key driver of trade. It is therefore important that the European Union continues to ensure a fair balance between strengthening Europe's security and competitiveness and safeguarding an open trade and attractive investment environment. This would support the resilience of complex supply chains that are vital for Europe's society and economy.

Over the past five years, Europe has set important goals for achieving a net-zero, resilient, smart, and sustainable future. Alongside these goals, various legislative initiatives, have been put into place.

Despite its good intentions, recent EU trade-related measures like the Corporate Sustainability Reporting Directive (CSRD), the EU's Carbon Border Adjustment Mechanism (CBAM), and the new import control systems (ICS2) have created bureaucracy and costs for companies. New regulations, though possibly suitable for large companies, are overly complex and burdensome for SMEs, making compliance technically and practically difficult for these smaller businesses.



RECOMMENDATIONS



Reset the pace of new regulatory initiatives before considering new ideas or packages. The volume of new legislation, their intricate connections, and the speed at which they have been finalised, present challenges for industry; especially when assessing legislative impact and determining the most cost-effective means of implementation for fostering a sustainable, net-zero, socially responsible, and resilient future for Europe.



Perform a close monitoring and assessment of the implementation and impact of the 'Fit for 55' package on the EU economy and transport sector, while avoiding amending measures distorting competition and elevating the risk of carbon leakage.



Identify areas for policy alignment to reduce duplicative burdens and explore opportunities to streamline policies and cooperation between the various services of the European Commission.



Avoid implementing duplicative compliance burdens and incentivise genuine compliance with targeted support and funding for SMEs, which are often drivers of innovation and economic growth remains important. Every legislative initiative should be accompanied by a regulatory impact assessment with a systematic application on the impact of SMEs.

STRENGTHEN THE SINGLE MARKET AND THE EU'S COMPETITIVENESS

As a result of disparate and divergent sustainability and supply chain resilience measures and fragmentation of the Single Market, economic operators are facing increases in the cost of production, compliance, and complexity of mandatory due diligence. This has a knock-on impact on downstream supply chains and the international competitiveness of European logistics.

In the face of these challenges, there is a role in seeking to ensure that duplicative compliance burdens are avoided and genuine compliance incentivised. The Single Market is the EU's most valuable asset and a key driver of economic growth, jobs, innovation and competitiveness.



A strong Single Market should ensure resilience in the face of crises and support the EU to address strategic dependencies.



RECOMMENDATIONS



Ensure full removal of barriers and bottlenecks to cross-border transport and logistics services across the EU in support of the free movement of goods, services, and people, enhancing the competitiveness of the EU.



Ensure free labour mobility across Member States and significantly simplify respective administrative procedures.



Provide a single window environment for business and harmonised regulations such as on combined transport. Today, the various divergences and authorisations make transport less efficient and hinder the functioning of the Single Market. However, in certain exceptional cases (e.g. islands and remote areas), local and national exceptions may prevail to ensure the well-functioning of the local logistics and supply chains.



Upgrade railway capacity coordination setting the conditions on the planning and allocation of railway infrastructure capacity in the EU to allow for more optimal use of the rail tracks, increase punctuality and reliability.



Support companies in the implementation of the Corporate Sustainability Reporting Directive (CSRD) by developing EU/ national initiatives to ensure accurate reporting based on the current and future European Sustainability Reporting Standards (ESRS), while limiting administrative burden, especially for SMEs along the supply chain.



Maintain operational flexibility for the various transport modes to enable efficient operations, i.e. follow the ICAO's Balanced Approach on Aircraft Noise in local discussions around airports via EU Regulation 598/2014.



Ensure harmonised cross-border road freight transport with different weights and dimensions for vehicles and vehicle combinations, as well as the coordinated interpretation and transposition of the respective EU legislation.



Address obstacles to capacity improvement such as planning issues and airport process as airport capacity is set to become a major issue facing air transport in the coming decades.



3

ENSURE FAIR COMPETITION AND LEVEL PLAYING FIELD

A strong and resilient Single Market should ensure transparent and fair competition between economic actors. Business requires more, not less competition to ensure choice and quality to the end customer. Effective competition rules combined with fact-based enforcement by the European Commission should support the freedom to trade across the EU.

In maritime transport, the COVID pandemic and more recently the Suez Canal crisis have demonstrated that disruptions in the maritime supply chain impact on many businesses in Europe who are sourcing globally, and that effective competition is important.

Furthermore, carriers, some of which receive state aid in the form of shipping funds and exemptions from taxes and social contributions, are increasingly moving towards integrated models and offer services that brings them in direct competition with freight forwarders and service providers. Together with vertical and horizontal consolidation this reduces choice of services for the customers.



CLECAT notes the liberalisation of transport markets in the EU has overall been accomplished in recent years, though the pace of achievement varies among different modes of transport. We continue to witness situations of no or little competition in rail freight and its infrastructure which becomes problematic when the services provided are not up to the required needs.

RECOMMENDATIONS



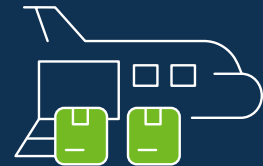
The increasing dominance of certain players in logistics and supply chains due to vertical integration needs careful monitoring to avoid abuse of dominant market positions. Additionally, effective oversight of collaboration between shipping lines, particularly through strategic alliances, is essential. This oversight should enforce competition rules in the evolving landscape of the liner shipping industry, enhancing the accountability of shipping lines.



Review the Maritime State aid Guidelines and tonnage tax regimes to ensure fair competition between integrated carriers and independent logistics service operators. As recommended by the OECD's International Transport Forum and in line with the Directive on a minimum global corporate tax, the European Commission should amend these guidelines to avoid market distortions and unbundle the activities eligible for favourable tax treatment under tonnage tax schemes. This will mitigate the risk of competitive distortions between vertically integrated shipping companies and independent freight forwarding and service providers.



Establish a level playing field with transport competitors within the EU and with third countries. Promoting fair competition, high safety standards, accessibility, and environmental protection can be advanced by cultivating collaboration with the International Civil Aviation Organisation (ICAO) and the International Maritime Organisation (IMO) to establish an international regulatory framework.



Revise Directive 96/67/EC on access to the ground handling market at Community airports to promote competitiveness, efficiency, and punctuality of services while maintaining high safety standards. Freight forwarders have observed that ground handling services at various European airports are misusing their market power, harming competition and consumers.



As part of the EU Global Gateway initiative, invest in dedicated projects in all modes of transport (e.g. port infrastructure, hinterland road and rail connections, green hydrogen) to facilitate trade and investments.



Monitor the risk of delocalisation of container transshipment activities to non-EU ports to evade the requirements of the EU Emission Trading System (ETS) Directive and the FuelEU Maritime Regulation, which potentially leads to operational inefficiencies and loss of competitiveness for EU ports and businesses.



4

SUPPORT THE GREEN TRANSITION

CLECAT supports the EU's ambitious climate policy, where the 2030 and 2040 climate targets are important steps for a pathway to net zero by 2050. The success of this is at risk without proper financial support and significant public investments. Looking ahead to the new EU legislative cycle, initiatives for low- and zero-emission freight transport, both at the European and national level, must actively support the decarbonisation of all transport modes.

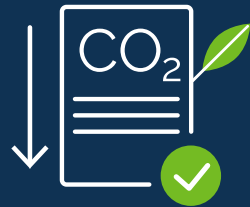
The green transition involves implementing incentives, enabling policies, and ensuring continue ample funding schemes while promoting the adoption of green technologies. Without proper access to finance and without immense public investments, the energy transition and the competitiveness of the industry are at stake.



Given the increasing urgency to step up decarbonisation efforts in the logistics sector, CLECAT and its members are committed to logistics emissions carbon footprint calculation and reduction through a uniform approach.



RECOMMENDATIONS



Support companies to pursue an emissions reduction strategy by enabling transport operators to accurately calculate, monitor and compare their emissions, facilitating behavioural change of transport users. The timely adoption and implementation of CountEmissions EU will be paramount to achieve this objective.



CountEmissions EU provides for a uniform approach on measuring and disclosing greenhouse gas (GHG) emissions from goods transport services which for now should remain a voluntary initiative led by the industry. We need a methodology that works now for business, with the possibility to start using default rather than primary data and without additional complexities such as a life cycle assessment that goes beyond the transport services provided.



Establish concrete and ambitious actions including EU and national financing programs and schemes, to facilitate and encourage the use of carbon-neutral transport solutions. This includes the recognition of the role of bridging technologies, such as biofuels and advanced biofuels, in meeting short-term climate targets for all transport modes.



Strengthen infrastructure for charging and fuelling zero- and low-emission light- and heavy-duty vehicles across the EU is a key pillar for the future.



Facilitate easier access to finance to transport companies, in particular SMEs, for fleet renewals and other innovative and green investments. This can be achieved through dedicated administrative support and simplified financial support schemes.



Implementing the action plan for electricity grids is an important step towards ensuring the future resilience of Europe's electricity system, helping to accelerate the deployment of infrastructure to support the widespread use of electric trucks. Transport companies need a reliable grid capable for both public and private charging infrastructure.



Establish a globally agreed-upon pricing mechanism for maritime greenhouse gas emissions to advance the transition towards environmentally sustainable shipping practices. Ensure alignment of the European Union's Emissions Trading System (ETS) for maritime with a forthcoming global standard.



Promote the production and availability of renewable fuels for maritime transport and aviation. More clean energy production capacity is needed, and investments must be accelerated through more efficient permit processes and funding.



Promote and incentivise the uptake of sustainable fuels through pragmatic deployment and crediting options through book and claim systems. Concretely, enact further flexibilities for sustainable aviation fuels within the RefuelEU Aviation Regulation through the introduction of a "book and claim" mechanism.



Promote the availability of renewable fuels for maritime transport and aviation in EU legislation. More clean energy production capacity is needed, and investments must be accelerated through efficient permit-granting procedures.

SUPPORTING RESILIENCE IN THE NEW GEOPOLITICAL CONTEXT

With mounting geopolitical challenges, the need for supply chain resilience and stability has never been greater than today. The COVID-19 pandemic, trade wars and military conflicts within and beyond Europe have demonstrated that situations of crisis impact the sourcing and transport strategies of companies, especially at places where these goods transit through maritime bottlenecks.

Diverse and geographically dispersed supply chains can help to mitigate the risk of disruptions. Freight forwarders supporting the logistics for their clients employ multiple transport modes – including air, maritime, road and rail – to spread these risks. The success of this depends on the relative vulnerability of different transport modes. Today, bottlenecks and disruptions in the flow of goods in and beyond Europe, due to the close and sometimes inflexible interdependencies of transport modes, routes and suppliers continue to pose major challenges to business. As transport is especially sensitive to external stress and shocks, policymakers need to integrate resilience in their policies by improving regulatory systems to make them more agile and flexible when coping with crisis situations.



RECOMMENDATIONS



Continue to invest in resilience and risk strategies in transport through digitalisation, efficient regulations and regular reviews of risks and vulnerabilities to secure accessibility and connectivity to and from EU markets.



Secure the funding criteria of the Connecting Europe Facility respecting the needs for international accessibility, strategic autonomy and crisis resilience.



Prepare for cross border contingency management for future crisis and improved data to make better use of its existing infrastructure capacity and to foster cross-border infrastructure links.



Diversify energy production and use as the EU depends on fossil fuels mainly imported from outside the EU and prioritise on access to renewables and alternative fuels for air and sea freight.



Update and improve the existing security framework, including tackling cyber threats, under the overarching umbrella of the existing rules.

SECURE A SOUND AND BALANCED CUSTOMS REFORM

Modern EU Customs legislation provides for numerous simplifications and facilitations through which goods can move across borders unhindered, while protecting consumers, businesses, the environment and tax revenue.

The EU is considered to have the most advanced and efficient customs procedures in the world, and this achievement should not be abandoned through reforms which have not sufficiently been thought through on their impacts on businesses. Well-working customs procedures and systems designed and evolved to facilitate European foreign trade supply chain operations ought to be preserved. It is imperative for lawmakers to focus on legislation that either bolsters what is already working effectively or rectify what is failing, avoiding detrimental changes to processes and systems that are functioning well.

CLECAT agrees with the need to modernise the EU customs system, at a time when business suffers from diverging local practices and a lack of harmonised treatment between national customs authorities. In its Communication 'Taking the Customs Union to the next level', the Commission proposed new and bold concepts seeking to better ensure a cohesive and harmonised interpretation of the rules across the EU and to better equip it to face current global challenges and to protect the Single Market.

However, by confining facilitations to a status (AEO to be replaced by Trust and Check) that is underutilised due to its complexity and simultaneously limiting the involvement of customs intermediaries, the reform appears to be counterproductive from an operational perspective.

As customs responsibilities will be expanded to include non-fiscal obligations at the importer/exporter level, and with the potential requirement for non-fiscal industry experts to assume importer/exporter-level customs representative, the reform risks leaving companies without essential support. This could compel them to allocate resources for their own authorisations, guarantees, expertise, and IT systems, and thus to increase their operational costs exponentially with the risk that many of them, in particular SMEs, will have to leave the market.



CLECAT regrets that the customs reform overregulates a successful segment of Europe's Customs policy in its haste to address the challenges of e-commerce with regards to data quality, product safety and undervaluation. Instead of streamlining compliant B2B trade and supporting SMEs, the proposal imposes unrealistic new expectations on importers. It is forcing companies to master customs procedures, a multitude of product compliance regulations and operate highly technical IT systems themselves just to have access to customs facilitations, all of which are currently available for them in a well-working and cost-efficient logistics service environment.

RECOMMENDATIONS



Examine the impact of the reform on European small and medium-sized enterprises (SMEs) in order to ensure that the intended reduction of administrative burdens applies to all businesses, irrespective of size. Trade will be suffering from a lack of know-how on customs and trade issues and as such exposed to new risks due a lack of consideration of the business realities.



Consider decoupling the reform proposal and prioritising pressing matters such as e-commerce and IT harmonisation, including a centralised Data HUB. This should ensure the smooth operation of the Customs Union remains uncompromised, given the potentially underestimated impacts of the more technical aspects, which are still to be clarified. At the same time, this could build up trust that a central data hub is feasible both with regard to its functionality and to data security. Such assurance will be needed before the decision on the abolition of the national import/export clearance systems can be taken.



Construct a comprehensive business modelling process which is essential for thoroughly evaluating the practical implications of the Customs Reform Proposal. This process is necessary to identify and rectify fundamental misconceptions within the current text, address critical omissions that could lead to serious implications and ensure that all future customs processes are executable. This comprehensive evaluation should precede the continuation of the legislative process to ensure a well-informed, effective Customs Reform



Consult stakeholders to ensure that solutions can be found that are workable from the perspective of both business as well as tax and customs authorities. With the recent introduction of new regulations, such as CBAM and deforestation, the issues that trade has been warning for, were only acknowledged by EU legislators was already adopted. Actively listening to trade before and not after costly rollout procedures can lead to better legislation.



Supportive of a need to modernise and reform EU Customs to ensure further simplification and harmonisation amongst EU Member States, we remain concerned about the consequences of the proposed EU Customs Reform for SME importers/exporters as well as SME customs representatives. This relates in particular to the future role of intermediaries who have an important role in the logistics supply chain of many European businesses, whereas the proposal focuses mainly on importers and exporters and largely disregards the role of logistics and customs service providers. This creates a risk for European businesses.



Continue to ensure a fair Union Customs Code (UCC) applicable in all Member States for all actors, with maximum facilitation and minimum burdens for trade. This requires a harmonised implementation and application of the UCC across Member States in the years to come prior to further reform implementation.



Continue to ensure realistic planning and deployment of the UCC IT projects, towards ensuring efficient and reliable systems and as little impact as possible on logistics processes. For example, significant efforts have been undertaken by the European Commission in establishing the EU Import Control System 2.0 (ICS2) regime, seeking to secure global supply chains by means of advanced risk analysis. The EU should ensure the successful implementation of the ICS2 regime and a reliable system for risk assessment and a method for threat analysis. This should remain aligned with other global Pre-Loading Advance Cargo Information (PLACI) regimes.



Ensure continuous IT support for both National Administrations and helpdesk support for trade for the UCC Work Programme IT projects. As these projects progress, it is crucial that trade flows remain uninterrupted. These systems, originally designed to boost European competitiveness whilst enhancing security, must be a priority for the Commission not only to oversee their development, but also to ensure the effectiveness and continuous availability of their actual production environment. The Commission should establish a centralised IT support framework, given that experience has shown that a referral to national helpdesks does not work for systems developed by the Commission.

DIGITAL TRANSFORMATION SUPPORTING EUROPEAN TRANSPORT AND LOGISTICS

Digitalisation in transport and logistics is crucial for efficiency, cost reduction, and resource optimisation. Freight forwarders, logistics providers, and customs brokers heavily rely on IT systems, playing a vital role in global supply chains. Many processes in transport and logistics are already digitalised or automated, especially in a business-to-business environment.



CLECAT emphasises the importance of creating an environment that encourages businesses to innovate and cooperate, avoiding singling out specific solutions. Technological neutrality remains crucial to prevent rapid obsolescence of new systems and solutions. In this context, the implementation of the Electronic Freight Transport Information (eFTI) Regulation is the foundation for a digital transport and logistics environment.



RECOMMENDATIONS



Boosting investments in digitalisation and implementing comprehensive monitoring of combined transport and multimodal operations across the entire transport chain are essential steps to enhance the efficiency of multimodal transport systems. Encouraging the adoption of intelligent digital solutions and technological advancements is also crucial. Simplifying the approval process for multimodal transport operations by offering required information in digital format through an electronic Freight Transport Information (eFTI) platform can streamline procedures for authorities.



Equip companies with the knowledge and resources necessary for a smooth implementation of the eFTI regulation. Educational initiatives supporting user friendly eFTI platforms can empower businesses to leverage the available tools effectively and integrate them into their operations. Provide the private sectors sufficient time and resources for implementation. SMEs should have a fair chance to implement changes required by authorities while improving their own services.



Introduce an enabling digital framework to stimulate programmes for innovation and further port digitalisation, such as smart ports programmes, to secure port call optimisation (to reduce waiting times in coastal waters and ports), just-in-time arrivals, advanced navigation systems (for fuel savings and emissions reduction).



The eFTI Regulation, adopted in 2020 and anticipated to be fully implemented in the coming years, marks a significant milestone in streamlining electronic data exchanges in the European Union. On top of this, additional measures to overcome the persisting challenges in the B2B transport and logistics environment can be considered. Notably, legal barriers and fragmented approaches at national level continue to impede the seamless adoption of paperless transport.



Ensuring robust cybersecurity in the transport and logistics sector and collaborating with national cybersecurity centres is vital. The adoption of the NIS2 Directive across the EU is expected to enhance cyber-resilience in the European transport sector, but ongoing monitoring will be necessary. The EU should maintain consistency between overarching and industry-specific regulations to prevent unnecessary administrative burdens and redundant reporting requirements.



STRENGTHENING THE CONNECTING EUROPE FACILITY FOR EFFICIENT CROSS- BORDER TRANSPORT INFRASTRUCTURE

The transport and logistics sector is deeply committed to the completion of efficient and sustainable transportation networks in the European Union. The new TEN-T serves as a vital enabler for multimodality in transport and logistics, contributing to economic growth, job creation, and ensuring safety and security interests during crises.

The next political cycle should ensure progress towards efficient, reliable, and high-quality transport infrastructure across maritime, rail, road, and aviation, focusing on cross-border transport and guarantee adequate funding for network completion, capacity increase, digitalisation, and the shift to zero- and low-emission mobility.

RECOMMENDATIONS



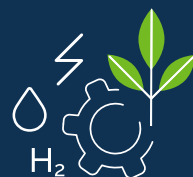
Timely completion of the Trans-European transport network (TEN-T) by 2030 for the core network, 2040 for extended core, and 2050 for comprehensive network connecting businesses and regions, ensuring a fully interconnected all-modes-of-transport system.



Renew and significantly increase Connecting Europe Facility (CEF) in the 2028-2035 EU budget, prioritising cross-border connections and decarbonisation projects.



Enhance the infrastructure, efficiency, availability, and accessibility of multimodal freight terminals by improving and optimising current facilities and services. Providing customs transit (CT) and multimodal transport solutions requires sufficient infrastructure, including terminals, as they act as crucial hubs for maritime, rail, road, and inland waterway transportation modes.



Ensure a technology neutral approach for alternative fuels.



Enhance the funding criteria of the CEF to ensure the needs for international accessibility, strategic autonomy and crisis resilience are better observed reflecting the changed geopolitical situation through increased funding for military mobility.



Establish a European network of safe and secure parking areas to improve cargo security and drivers' safety and working conditions, in line with Mobility Package I rules and the new TEN-T Regulation. A lack of safe and secure parking areas also contributes to cargo crime which is increasing in a number of EU countries resulting in millions in losses for companies every year.



Develop a reliable electrification network, updating existing grid infrastructure and promoting access to EU funding for efficient network development to meet the objectives and ambitions laid down in the Alternative Fuels Infrastructure Regulation (AFIR).

ENHANCE SKILLS AND TRAININGS FOR THE LOGISTICS SECTOR

Skilled workforce is central to the logistics sector being able to operate effectively. The workers shortage in transport and logistics, caused in part by trends such as an ageing population and insufficient new recruitment, is already having a negative impact on transport capacity and this problem is expected to worsen in the future.

The logistics sector needs an education and vocational offer that matches business needs. But there are other solutions: legislation should boost the efficiency of vehicles, companies should be able to deploy staff flexibly, plan better and work smarter. Smarter working includes applying technological developments including digitisation, automation and artificial intelligence.



Promote and support enhanced education and skills training programs to ensure a highly skilled and adaptable workforce. Co-funding of vocational training will be crucial to reduce the gap between educational systems and business needs to strong competition for certain functions which require new skills.



Collaborate with the private sector for the implementation of the European Skills Agenda for sustainable competitiveness, social fairness, and resilience and in particular to join the Pact for Skills.



Continue to support the European freedom of movement of labour, which enables the logistics industry to attract talented employees from all over Europe, remains beneficial for all.



Faster recognition of professional certificates and diplomas from third countries nationals to make it easier to employ talent from non-EU countries.



We need to attract new talent into the logistics profession to meet the challenge of the digital transition. This starts with ensuring professional training and education but equally good working conditions and visibility and appeal of the sector.

RECOMMENDATIONS



EFFICIENT AND INTERCONNECTED FREIGHT TRANSPORT

All transport modes are engaged in unprecedented transformation due to the urgent need to decarbonise freight transport. Considering the expected increase in demand for transportation services, it is vital to improve the efficiency of each mode of transport as well as modal interoperability and multimodal optimisation, acknowledging that various transport modes are not competing but complementary. Many freight forwarders are willing to offer door-to-door solutions combining rail and road transport in the most efficient way, but the reality is that rail is still more expensive than road alternatives with reliability of rail operations still being a concern for logistics operators.

Development of cross border rail freight transport remains weak in the EU despite the modal shift efforts: the modal share of rail freight in inland freight transport has remained stable.

The revision of the Combined Transport Directive provides an opportunity to promote multimodality and to establish a common harmonised framework for combined transport replacing the current patchwork of national regulations. Also, the proposed Regulation on Rail Infrastructure Capacity will allow for more optimal use of the rail tracks, increase punctuality and reliability, also helping to reduce emissions. However, as rail freight remains complex, sustainable modal shift will not be possible without additional efforts to enhance the quality performance of rail freight. All modes of transport will be needed to transport future volume, and this can only be done when

all modes are allowed to become more efficient and environmentally sustainable on the basis of their own merits.

For air freight it remains crucial to ensure a competitive air transport market for cargo and to improve the overall level of service. Freight forwarders are reliant on a fair and adequate slot allocation regime for full freighter aircrafts, to ensure its customers, shippers, are being served with timely and good quality service levels, which can be expected from air freight, which represents an economically strategic transportation service for the European economy.



RECOMMENDATIONS



Prioritise swift progress on the revision of the Combined Transport Directive with the aim to adopt an ambitious yet realistic reform. The Directive should be accompanied by robust support schemes in favour of more efficient and sustainable transport supply chains. However, a patchwork of national support measures should be avoided to support compatibility with the Single Market principles and ensure true cost reductions along whole corridors.



Support the introduction of European Modular System (EMS) vehicles, in particular for combined transport operations. Trucks do not compete with other mode of transport such as rail transport. Evidence from logistics operators that have made use of EMS suggests that such vehicles have not substituted rail or inland waterway travel, but rather led to the replacement of conventional 40-tonne trucks.



Prioritise the establishment of highly efficient and flexible rail infrastructure capacity management through increased cross-border cooperation between national infrastructure managers and rail undertakings.



Support the implementation of the European Maritime Space by boosting short sea shipping connections in the EU. Maritime transport plays a significant role in multimodal transport chain, but cargo can be transported only between ports or other places with sea-side cargo handling facilities. Hence, the need for an efficient integration of maritime and hinterland transport.



Review State aid guidelines for rail transport by extending their scope to include all relevant transport operators in the intermodal chain that contribute to the modal shift of freight. The European Commission must ensure that the improvement of the toolbox of aid measures supporting more sustainable transport modes will lead to a fair, non-discriminatory and transparent distribution of support measures.



Review the EU Slots Regulation to mitigate airport congestion to effectively address the escalating congestion at EU airports. This revision should establish fair, non-discriminatory, and transparent rules for the allocation of landing and take-off slots, ensuring optimal utilisation and fostering fair competition.



It is crucial that legislators agree on a text on Weights and Dimensions which supports incentives to road transport operators to invest in zero-emission vehicles allows the cross-border use of EMS / longer and heavier vehicle combinations between consenting Member States. The resulting efficiency gains will generate immediate downward effects on CO2 output and are therefore to be welcomed. These provisions are key to further decarbonise the road transport sector and to achieve EU climate goals!

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