

Von:

Sehr geehrter

unser europäischer Chemieverband Cefic bewertet den o.g. Kompromisstext wie nachfolgend beschrieben.

Wir würden uns freuen, wenn die genannten Argumente bei der Positionierung Deutschlands im Rat Berücksichtigung finden würden und stehen für Rückfragen gerne zur Verfügung.

#### Article 1 – par 1 – Point 3 – Article 1c – point 2 (a)

##### **Cefic opposes to the addition of ‘as the crow flies’ as basis for calculating the non-road leg.**

- The difference between the great circle distance (GCD, ‘as the crow flies’) and the shortest feasible distance (SFD) in rail is substantial.  
This difference can go up to 50%, which has a big impact on the possible truck driving distance to the terminal. For the road leg, GCD and SFD are closer to each other (5-10%).  
Attached some examples calculated from the terminal Combinant in Antwerp, Belgium.
- The ultimate ambition of the CT Directive is to realise a shift to rail or inland waterways and a substantial reduction in transport emissions.  
Every shift to the alternative modes should be welcomed, and not limited because of the length of first & last leg by truck.
- Road legs to / from intermodal terminals are perfect use cases for zero emission trucks, because the short distance allows for regular charging or fueling.

#### Article 1 – par 1 – Point 3 – Article 1c – point 2 (b)

##### **Cefic opposes to the limitation of the road to maximum 150 km or the nearest suitable terminal**

###### **1. Rail connectivity**

- Terminals are preferably selected because of their direct rail connectivity with the requested destination (no transshipment needed in other terminals)
- Also the frequency to this destination is crucial to reduce total transport lead time and corresponding product stock/buffering needed.
- The cost of the rail connection is of course a critical factor. These differences can be substantial between rail connections and much higher than the cost difference for the longer road leg.
- But also the reliability of the rail connection to the final destination is crucial, as combined transport distribution is decided for a longer period between the shipper and his customer.
- Also the cost of terminal operations plays a role
- ⇒ The choice of terminal + rail connection is always the most competitive solution : **requested reliability at the lowest cost**
- ⇒ Limiting the distance to 150km or the nearest suitable terminal is **limiting competition in CT sector and competitiveness of shippers.**

###### **2. Availability and services of terminals**

- Many terminals are at **full capacity**. This is causing delays (unreliability) in the train connections, and containers to be loaded to a next train instead of the planned train. Customers might avoid these terminals and seek for another terminal at a further distance.

- For most Cefic members, the terminals must have the **proper permits and knowledge to accept dangerous goods**. This requires to temporarily storage of full dangerous goods containers.
- Additionally, Cefic members require **proper emergency intervention** possibilities : access routes for emergency intervention services, fire extinguishing infrastructure, special equipment to handle leaking containers,....
- For the chemical sector, the close availability of **additional services** is very important : container cleaning station, heating of containers, depot for empty containers,...
- As part of the decarbonization of the road legs, the **availability of charging and fueling stations for alternative fuel or EV trucks** can influence the choice of the terminal.

### 3. Conclusion

- The choice of terminal and rail/IWW connection is part of a supply chain network decision which is a result of production, customer and stock strategies, and based on performance criteria such as reliability, cost, lead time, safety, environment,...
- The distances referred to in the legislation should be based on the SFD and not the GCD.
- The additional limitation of 150km is restricting business decision making and competitiveness of supply chains.

#### Article 1 – par 1 – Point 10 – Article 9a – point 2 and point 3

##### **Cefic opposes to the possible derogation by members states from the driving bans on combined transport road legs in sections of the road network**

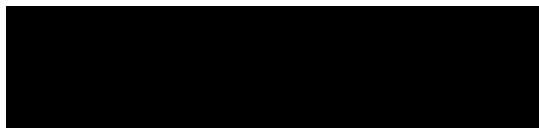
- Driver bans on regional level add complexity to the supply chain. Loading or unloading sites and the intermodal terminal could be in different regions, which might make it impossible to use combined transport due to the longer lead time caused by the driving bans.
- Alternatives to find another terminal with no driving bans, may lead to higher costs, which makes the combined transport alternative not competitive compared to road only transport.
- Therefore, Cefic urges a European harmonized approach and exempt the road leg in combined transport from driving bans.

#### Article 3 – par 2

##### **Cefic welcomes the use of eFTI platforms, but implementation must be complete and reliable**

- Cefic support the use of digital communication regarding proof of compliance with the Combined Transport criteria.
- Prerequisite is that all EU Member State Authorities must have fulfilled their obligation to accept eFTI data, compliant with the technical and functional requirements as described in the Implementing Act of the eFTI Regulation.
- Sufficient certified eFTI platforms should be available for the economical operators to fulfill their obligation to proof compliancy.
- Therefore, Cefic supports the proposal that at least 10 eFTI platform service providers hold a valid eFTI certification.

Freundliche Grüße



Verkehr

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