

From: [COMP RAIL REVISION](#)
To: [REDACTED]
Cc: [COMP RAIL REVISION](#)
Subject: FW: HT.5524_Reply_from_an_organisation
Date: mercredi 18 septembre 2024 17:58:40
Attachments: [image004.png](#)
[image005.png](#)

[REDACTED]
Sent: Wednesday, September 18, 2024 4:28 PM
To: COMP STATE AID GREFFE <Stateaidgreffe@ec.europa.eu> [REDACTED]
Cc: COMP RAIL REVISION <comp-rail-revision@ec.europa.eu>
Subject: HT.5524_Reply_from_an_organisation

Dear Sir or Madam

In relation to the public hearing on State aid – draft Land and Multimodal Transport Guidelines (LMTG) and draft Transport Block Exemption Regulation (TBER), International Transport Danmark (ITD) has the following comments.

ITD recognizes that there may be areas where some form of state support can be relevant to support combined transport. However, such aid must not distort the competition. Likewise, such support should also only be given where it contributes to the society in general, and not simply because it is a support to a specific form of transport (rail/sea). Likewise, the different geography in the Member States can also have an impact on whether multimodal transport makes sense and to what extent.

In relation to CO2-emissions for the various forms of transport, ITD also notes that there is a continuous development within road transport, where the focus is already on reduction of emissions of particles and CO2. For example, the future tolls differ in relation to the CO2 emissions of a vehicle. This development in the field of transport should also be taken into account, which is why the external costs will also change over time. Sometimes other initiatives, such as EMS, might be the better alternative than combined transport.

Further ITD can support the comments made by IRU.

Best regards | Mit freundlichen Grüßen

[REDACTED]

[REDACTED]



☐ **ITD** | Association for the Danish road transport of goods

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