

Improving competitiveness of intermodal transport

Impact assessment (SWD(2023) 351 and SWD(2023) 352 (summary)) accompanying a Commission proposal for a directive of the European Parliament and of the Council amending Council Directive 92/106/EEC as regards a support framework for intermodal transport of goods and Regulation (EU) 2020/1056 of the European Parliament and the Council as regards calculation of external costs savings and generation of aggregated data, COM(2023) 702

This briefing provides an initial analysis of the strengths and weaknesses of the European Commission's impact assessment (IA) accompanying the above-mentioned [proposal](#) submitted on 7 November 2023 and referred to the European Parliament's Committee on Transport and Tourism (TRAN). According to the IA, this initiative, which would update the existing Combined Transport Directive¹ ([92/106/EEC](#), 'CTD') and complement the [greening freight transport package](#), seeks to increase the uptake of intermodal transport to reduce negative externalities and energy consumption of transport, and to mitigate the fragmentation of the internal market. This initiative, announced in the Commission's sustainable and smart mobility [strategy](#) (SSMS), helps achieve the greenhouse gas (GHG) emissions reduction target set in the [European Green Deal](#). Moreover, it is included in the Commission [2023](#) work programme and the [joint declaration](#) on EU legislative priorities for 2023 and 2024.

Problem definition

The IA explains that the objective of the CTD is to support intermodal transport, incentivise the shift from road freight to lower-emission transport modes (inland waterways, maritime transport and rail) and improve its competitiveness in relation to road-only transport. The IA notes that, although intermodal freight transport has significantly increased (doubled in the past 30 years) since the adoption of the CTD, road-only transport still dominates freight transport in the EU (53.3% of all intra-EU transport and 74.4% of intra-EU inland transport in 2020) (IA, pp. 1-3, 6-12).

According to the IA, road transport is a significant driver of negative externalities of transport (e.g. CO₂ emissions, air pollution, accidents, congestion, noise) and energy consumption. The IA refers to the handbook on the external costs of transport ([CE Delft et al., 2019](#)), which estimates the total external costs incurred by EU freight transport at €203 billion a year. It found that average external costs are almost three times lower for rail transport (€0.013 per tonne-kilometre, tkm) and inland waterways–road intermodal transport (IWW) (€0.019 per tkm) compared with heavy goods vehicles (HGVs) (€0.042 per tkm). In addition, the IA notes that the energy consumption of intermodal transport is clearly lower per tkm than that of road-only transport. Examples include: 0.146 kilowatt-hours (kWh) for road transport, 0.02 kWh for rail, and 0.046 kWh for IWW (IA, pp. 6-12).

The IA finds that intermodal transport is not competitive enough with road-only transport, and identifies reasons. For example, a different level of internalisation of external costs exists between transport modes. The IA also explains that possible performance gaps and costs of each leg of intermodal transport affect its competitiveness. The IA therefore refers to the SSMS, which



recognises the need for a 'comprehensive set of measures' to ensure a fair pricing of all transport modes (IA, pp. 5-16; Annex 5, pp. 120-122).

The IA describes the 2016 [REFIT evaluation](#) and the two earlier CTD amendment proposals of [1998](#) (withdrawn in 2001) and [2017](#) (withdrawn in 2020), which sought to improve the CTD's effectiveness. The REFIT evaluation considered that the CTD still is a 'relevant instrument for supporting freight transport combining different modes'. The IA mentions that the shift from road-only to intermodal transport has resulted in savings of up to €2.1 billion in external costs in 2011, and refers to the 7.5 Mt of CO₂ saving from the shift from road to rail, and the 0.96 Mt of CO₂ saving from the shift to inland waterways. Nevertheless, the evaluation also identified several problems, such as certain outdated CTD provisions (e.g. the requirement on the use of paper documents), and the diverging transposition and implementation by Member States, which weakens the CTD's effectiveness.

According to the IA, this initiative would address the **problem**, which is defined as (IA, pp. 6-12):

- 'the current uptake of intermodal transport is insufficient for effectively contributing to the reduction of external costs and energy consumption of transport'.

The IA identifies **four problem drivers** (Ds) that it expects to persist without further EU action (IA, pp. 12-17):

- D1) 'eligibility for support under the CTD is too narrow and complicated';
- D2) 'lack of market monitoring/empirical basis for the support';
- D3) 'the incentives provided by the CTD to enhance the relative competitiveness of intermodal transport are insufficient to reduce the gap with road-only transport'; and
- D4) 'inefficiencies in scheduling, planning and running intermodal transport'.

In accordance to the [Better Regulation Guidelines](#) (BRG), the IA presents a well-evidenced problem definition; it identifies the problem and the problem drivers, and also provides quantified estimates of their scale. However, for clarity reasons (to clearly link problem, objective and options), the internal market issues discussed in the problem definition could have been included in the formulation of the defined problem, as 'mitigation of the fragmentation of the internal market' is part of the general objective (see below), (IA, pp. 16-17).

Subsidiarity / proportionality

The legal basis for the proposal is Article 91(1) of the Treaty on the Functioning of the European Union (TFEU). The IA explains, briefly but sufficiently, the need for EU action and its added value. For example, it notes that the negative externalities are transboundary problems; 81 % of intermodal transport is operated between Member States. Moreover, EU action would enhance a level playing field for operators across the EU, simplify administrative procedures and contribute to better functioning of the internal market (IA, p. 17). Subsidiarity and proportionality are further discussed in the comparison of options and in the context of the preferred option. The IA does not provide a separate subsidiarity grid. At the time of writing, no reasoned opinions were submitted by the 28 February 2024 deadline for the national parliaments' [subsidiarity check](#).

Objectives of the initiative

The IA defines the **general objective** of this initiative as 'to facilitate an increase in the share of rail, short sea shipping–road intermodal transport (SSS) and IWW transport in total intra-EU freight transport, to reduce negative externalities and energy consumption of transport as well as mitigate the fragmentation of the internal market'.

The IA also defines **four specific objectives** (SOs), which are linked to the problem drivers:

- SO1) 'to provide support to a wider range of operations under effective and common eligibility conditions' (linked to D1);

- SO2) 'to ensure better support by improving reporting on the intermodal transport' (linked to D2);
- SO3) 'to increase the competitiveness of intermodal transport to contribute to reducing negative externalities' (linked to D3); and
- SO4) 'to improve transparency and cooperation and simplify entry to the market' (linked to D4) (IA, pp. 17-19).

In line with the recommendation of the BRG, the IA defines **six operational objectives** after having selected the preferred option (IA, pp. 54-55). The defined objectives appear to meet the S.M.A.R.T. criteria, i.e. they are specific, measurable, achievable, relevant and time-bound. The IA explains that the initiative would also contribute to three United Nations [Sustainable Development Goals](#) (SDG 13: take urgent action to combat climate change and its impacts, SDG 9: build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation, and SDG 11: make cities and human settlements inclusive, safe, resilient and sustainable) (IA, p. 18).

Range of options considered

In line with the BRG, the IA presents a sufficient range of options, namely five policy options (POs) (PO-A, PO-B subdivided into three sub-options B1, B2a, B2b and PO-C) against the baseline (no further EU action) (IA, pp. 19-29). The 17 retained policy measures are grouped to the policy options according to their level of intervention. PO-A would offer soft EU-level intervention; PO-B-sub-options would combine EU-level obligations with flexibility for Member States; and PO-C would provide strong EU intervention. The policy options, linked to the SOs and problem drivers, appear to present self-standing alternatives, except that three policy measures are included in all options (PM3, PM16 and PM17). The policy measures and policy options appear to be described sufficiently and in a balanced manner. Moreover, the IA explains the retained and the discarded policy measures in more detail in Annexes 6-7 (pp. 123-132).

Policy measure (PM)	A	B1	B2a	B2b	C
SO1: Provide support to a wider range of operations under effective eligibility conditions					
PM1: Includes in the scope all intermodal operations in the EU that save 25 % of GHG emissions when using intermodal operation instead of road-only; the calculation of GHG savings is based on a common EU methodology.		x			
PM2 (all-intra-EU): Includes in the scope all intermodal operations in the EU that save 40 % of external costs when using intermodal operation instead of road-only; the calculation of external costs is based on a common EU methodology that uses the unit values from the handbook on the external costs of transport (CE Delft et al., 2019), established by means of an implementing act.	x		x		x
PM2 (cross-border): Includes in the scope only EU cross-border intermodal operations that save 40 % of external costs when using intermodal operation instead of road-only; the calculation of costs is the same as in PM2 (all-intra-EU).				x	
PM3: Establishes a common data set for proof of eligibility with implementation via electronic freight transport information (eFTI) platforms.	x	x	x	x	x
SO2: Ensure better support by improving reporting on the multimodal/intermodal transport					
PM4: Replaces reporting by the Commission with Member States' voluntary analysis and strategic planning for sustainable freight transport.	x				

PM5: Replaces reporting by the Commission with Member States' mandatory analysis and strategic planning for all freight transport system (cross-modal). Includes an obligation to regularly review the measures.					X
PM6: Reporting by the Commission with revised monitoring data and reporting period, including a review clause for reassessing the support regime established in the CTD. Obligation for Member States to notify ex ante their support schemes, which the Commission has to make available on a common website.		X	X	X	
SO3: Increase competitiveness of multimodal/intermodal transport					
PM7: A regime for mandatory harmonised support. It would be considered not constituting State aid. Member States are obliged to provide support to reduce door-to-door costs of intermodal operations at a level that induces modal shift. The existing regulatory support measures (CTD Articles 2, 4, 7, 8, 9) would be removed.					X
PM8: A regime for voluntary non-harmonised support; State aid rules apply where relevant. Call on Member States to use operational support tools from the Toolbox (to be annexed to the revised CTD) to reduce door-to-door costs of intermodal operations at a level that induces modal shift.	X				
PM9: A regime for mandatory non-harmonised support; State aid rules apply where relevant. Member States are obliged to have at least one operational support tool from the Toolbox to reduce door-to-door costs of intermodal operation at a level that induces modal shift.		X	X	X	
PM10: Voluntary support; State aid rules apply where relevant. Call on Member States to provide start-up support.	X	X	X	X	
PM11: Mandatory non-harmonised support; State aid rules apply where relevant. Member States are obliged to have at least one technological upgrade support measure from the Toolbox.		X	X	X	
PM12: Limits the direct financial support only to short and medium-long operations that normally are not cost-competitive with road-only transport (mode-specific thresholds).	X	X	X	X	
PM13: Exempts road-legs of eligible intermodal operations from the fixed driving bans (night-time, weekend and holiday).		X	X	X	X
SO4: Improve transparency and cooperation and simplify entry to the market					
PM14: Defines a data set for information to be shared between parties of transport chain by means of an implementing or delegated act.					X
PM15: Establishes an obligation to use common data exchange protocols for operations covered by the CTD by an implementing or delegated act.					X
PM16: Requires terminal operators to publish information on services and facilities available in each terminal. A list of mandatory information to be established in an implementing act.	X	X	X	X	X
PM17: Provides a possibility to establish a framework of terminal categories based on minimum requirements on services/facilities available at terminals, by means of an implementing act.	X	X	X	X	X

Source: Compiled by the author on the basis of Table 4 (IA, pp. 22-25) and Annex 6 (IA, pp. 123-130). The preferred option, including the policy measures, is indicated in grey.

Assessment of impacts

The IA assesses, both qualitatively and quantitatively, the main expected economic, social and environmental impacts of the policy options for the 2025-2050 period, as the policy measures are

due to be implemented as of 2025 (IA, pp. 29-46). In **economic impacts**, the IA considers adjustment, support and administrative costs for **national public authorities**. For example, the IA estimates the recurrent costs of additional economic support at €1.7 billion in 2030 and €2.4 billion in 2050 for PO-C; at €379.1 million in 2030 and €451.1 million in 2050 for PO-B2a; €363.8 million in 2030 and €365.4 million in 2050 for PO-B1; and €317.4 million in 2030 and €282.1 million in 2050 for PO-B2b. PO-A would not generate costs, as the support measure is voluntary. The IA provides cost estimates for support measures also per Member State. In addition, the IA expects adjustment costs for the **European Commission**: €2 million in PO-B, and €0.3 million in PO-A and PO-C (these estimates include one-off costs of €0.3 million for all options). The one-off adjustment costs for **businesses** for PO-A and PO-B would be around 0.3 million, while for PO-C, the costs would amount to 28.3 million (due to PM15 and PM14). The IA estimates the administrative costs for businesses at €0.1 million for both PO-A and PO-C, at €6.4 million for PO-B1, at €6.6 million for PO-B2a and at €3.2 million for PO-B2b (present value over the 2025-2050 period). Besides costs, the IA identifies administrative cost savings from PM3 (eligibility rules/eFTI platforms), PM6 (information on support schemes) and PM7-PM9 (support measures), and estimates the expected savings at €3.57 billion for PO-A, €4.3 billion for PO-B1, €4.34 billion for PO-B2a, €3.43 billion for PO-B2b and €5.48 billion for PO-C (present value over the 2025-2050 period). Moreover, the IA briefly discusses energy consumption and finds that, since all options would increase intermodal transport, energy savings can be expected; PO-B sub-options would bring the highest savings (IA, pp. 29-40, 43).

When assessing **social impacts**, the IA discusses impacts on road safety, congestion and employment. The IA considers that the options that reduce road-only transport most would also decrease congestion and accidents most; regarding accident reduction for instance, the IA expects the highest impact for PO-B2a (e.g. 1 663 accidents less in 2025-2050 compared with 102 for PO-A, 1 547 for PO-B1, 1 214 for PO-B2b and 530 for PO-C). While the IA envisages new jobs in intermodal transport, it also considers that, as a result of the modal shift, job losses are expected in road transport; it does not expect direct job transfers between road and non-road sectors, as skill requirements are different in various transport modes. While it also points out that 'the commercial road transport sector faces an increasing demand and a significant shortage of drivers', it would have been useful if the IA had further clarified the employment scenario in road transport. The IA finds that none of the policy options would negatively affect **fundamental rights** (IA, pp. 43-45).

The IA discusses **environmental impacts** (in more detail in Annex 4) in terms of external costs of CO₂ emissions, air pollution and noise, and finds that PO-B2a would generate the highest cost reduction (e.g. €4.60 billion for CO₂ emissions in 2025-2050 compared with €147 million for PO-A, €4.4 billion for PO-B1, €2.93 billion for PO-B2b and €2.67 billion for PO-C). Conversely, the IA mentions that the projections show an increase in air pollution in 2050 for PO-B1 (costs of €18 million), PO-B2a (€21 million), PO-B2b (€23 million) and PO-C (€17 million); however, it considers the increase marginal and explains this to result from particulate matter emissions from rail transport. It finds the policy options to be consistent with EU environmental objectives; no significant harm is expected (IA, pp. 45-46).

Regarding impacts on the **internal market**, the IA finds that PO-C would provide the strongest impact (a mandatory harmonised support) and PO-A the weakest (voluntary non-harmonised support). Among PO-B options, PO-B1 and PO-B2a would perform better than PO-B2b due to their different scope. In addition, the IA discusses briefly the **regional** dimension. It explains that the 'relative benefit' of modal shift is more relevant in central regions where traffic volumes are high, and that national measures support the uptake of intermodal transport in these areas. On the other hand, the IA recognises the potential of modal shift in peripheral regions, and considers that support measures could have a 'considerable effect' (not specified) in facilitating intermodal transport in more remote areas. In this respect, the IA considers PO-B2a the best option, as it would have the highest increase in intermodal volumes. In line with the BRG, the IA considers the '**digital-by-default**' principle, and explains that it has been taken into account in PM3, which is applied in all options (IA, pp. 41-43).

The IA compares the policy options against the Better Regulation criteria of effectiveness, efficiency and coherence, as well as subsidiarity and proportionality, and scores the policy options in terms of all these criteria (IA, pp. 46-51). The IA explains the assessment criteria of **effectiveness** and their link to the general and specific objectives; it finds that PO-B2a has the highest net benefits and is the most effective option (better balance with different modal combinations). The IA provides a quantitative **efficiency** analysis, presenting each policy option's costs and benefits. The IA scores PO-A as the most efficient option because of its best 'benefit-to-cost' ratio. The IA could have clarified the **coherence** assessment, since it scores PO-B2a and PO-C as equally coherent options, despite also finding that PO-B options show 'higher internal coherence than PO-C', and – when comparing B-sub-options – that PO-B2b is 'slightly more coherent' (p. 49), and 'PO-B2b slightly less coherent than PO-B2a' (p.52). Regarding **subsidiarity**, PO-B2b, which excludes domestic operations, scores more than other options; however, the IA points out that this 'gain of subsidiarity' is limited because the scope of this option would increase complexity and administrative burden. According to the IA, PO-B1 and PO-B2a would be the most **proportionate**, as they would provide 'sufficient modal shift at reasonable cost'. The IA sums up that **PO-B2a is the preferred option**, and substantiates this choice by arguing that it is the most effective option that ensures the highest modal shift and external cost savings, and brings the highest net benefits. The focus appears to be on the effectiveness aspect, since the comparison against other criteria does not appear to score this option best against all criteria. While the IA refers to PO-B2a as the 'most effective, efficient and coherent policy response', the comparison found that PO-A is the most efficient, and both PO-B2a and PO-C are the most coherent (although the coherence assessment would need some clarification). The argumentation on the choice of the preferred option would have benefited from further clarification.

SMEs/ Competitiveness

The IA notes that this initiative is relevant for small and medium-sized enterprises (**SMEs**), and, consequently, a four-step [SME test](#) (Better Regulation Toolbox, Tool#23) was performed and very briefly explained in Annex 13 (pp. 144-145). According to the test, the expected increase in intermodal transport would 'have a positive economic impact on all SMEs, other than road hauliers'. Given the expected job losses in the road transport sector, the mitigating measures to minimise negative impacts on road-hauliers (of which 99 % are SMEs) could have been discussed in more detail, even though they are briefly mentioned in the context of social impacts (p. 44). In addition, the IA does not differentiate businesses according to size classes (micro, small and medium enterprises). In this respect, the IA mentions in the economic assessment that 'the available data did not allow a split of these costs savings between the two groups of operators (i.e. SMEs and others)' (IA, p. 145).

The IA discusses impacts on **competitiveness** and includes also a dedicated Annex 5; it notes that, as the initiative concerns only transport operations in the EU, it does not have an impact on international competitiveness. The IA considers the consistency of policy measures (support scheme) with State aid rules, and the policy options' scope relative to the functioning of the EU internal market. It explains that a 'limited cost-benefit study' was conducted in order to explore a reasonable support level to compensate the price gap between road-only and intermodal transport and break-even distances at which transport activity becomes competitive (price), while also stressing other factors that are relevant for competitiveness (e.g. delivery time, infrastructure). The IA finds that an increase in the competitiveness of intermodal transport would have a knock-on effect on the entire economy and some positive impact on innovation (pp. 29-33, 41-42, 120-122).

Simplification and other regulatory implications

The IA explains that the initiative would simplify procedures and increase efficiency of the CTD. In the 'one in, one out' approach, the IA estimates that for businesses the recurrent administrative costs would be €6100 and recurrent administrative cost savings (digital data, eFTI platforms) €0.43 billion per year (IA, pp. 52-53). The IA discusses how the initiative relates to other EU policy instruments,

such as the proposals in the Greening Freight Transport Package, the [revision of the TEN-T Regulation](#) and Land and Intermodal transport enabling Regulation ([\(EU\) 2022/2586](#)), for instance (IA, pp. 3-5).

Monitoring and evaluation

While the IA describes the monitoring plan that consists of operational objectives, relevant indicators (quantitative and qualitative) and data sources (e.g. Member States, eFTI platforms, a dedicated study), it does not explain the evaluation plan. However, the legislative proposal's explanatory memorandum does explain that a report on the economic development will be provided every 5 years, and that continuation of the support scheme will be assessed after 10 years of application (IA, pp. 54-55; explanatory memorandum of the proposal, pp. 12-13).

Stakeholder consultation

As required in the BRG, the IA describes the broad stakeholder consultation activities in Annex 2, including a description of various stakeholder groups consulted, such as shippers, freight and connection organisers, transport and terminal operators, public authorities and civil society (pp. 62-74). The **inception impact assessment** consultation received 62 contributions between 19 August and 16 September 2021. An **open public consultation** (OPC), which ran between 7 March and 30 May 2022, thus meeting the BRG's 12-week requirement, gathered 101 responses. **Targeted consultations** were also carried out: 32 interviews, an online survey (59 responses) and an expert meeting with industry stakeholders (60 participants from 55 organisations). The figures show some discrepancy, as the IA mentions different numbers of participants, for instance for the targeted survey (39, 49 and 59) (IA, pp. 62, 65, 144). The summary describes stakeholders' views on the problems, objectives and different measures in the OPC, the survey and the interviews. However, it does not explain the outcome of the stakeholder expert meeting, which, according to the IA, met 'after the policy options under consideration had been agreed with the Commission, but before the preferred policy option had been chosen', and 'focused on the discussion on the choice of the preferred option'. Overall, the IA does not provide descriptions of the stakeholder groups' views on the policy options. While the SME test explains that a targeted questionnaire was used to collect data on SMEs and micro-enterprises, and that 19 out of 39 respondents in the targeted consultation and 6 out of 23 companies in the OPC were SMEs, SMEs are not specifically mentioned in the stakeholder consultation summary (IA, pp. 62-74, 144-145).

Supporting data and analytical methods used

The IA draws on the REFIT evaluation of the existing CTD, the IA supporting study (Ricardo et al, 2023; referenced but without a hyperlink), stakeholder consultation and other studies in the policy field (e.g. [PWC, KombiConsult](#), 2022; [CE Delft et al.](#) 2019; [TRT](#), 2017; European Court of Auditors special [report](#) on intermodal transport, 2023). The IA explains the analytical methods used in Annex 4 (pp. 79-119); for instance the PRIMES-TREMOVE, ASTRA and TRUST models, described in the European Commission's modelling inventory and knowledge management system ([MIDAS](#)), and the assessment of the impacts of policy measures. In addition, the IA transparently explains difficulties and limitations in the analysis, for instance regarding employment impacts in the road transport sector resulting from the increased modal shift, and quantification of the impacts specifically for SMEs (IA, pp. 44, 144-145).

Follow-up to the opinion of the Commission Regulatory Scrutiny Board

The Regulatory Scrutiny Board (RSB) gave a negative [opinion](#) on the draft IA report on 12 May 2023, followed by a positive [opinion](#) with reservations on the revised draft IA report on 29 June 2023. It considered that the rationale for action, and the interaction with parallel instruments tackling transport externalities, should be clarified, and subsidiarity issues sufficiently assessed. It also found that the comparison of options was not sufficiently balanced and the choice of the preferred option not adequately justified. As required in the BRG, the IA explains how it has taken into account the

RSB's points (Annex 1, pp. 56-61). While it appears that the RSB's points have been largely addressed, it is not possible to ascertain this in all aspects, as the previous draft IA is not publicly available. The IA could have further clarified the scoring and the arguments for the choice of the preferred option.

Coherence between the Commission's legislative proposals and the IA

The legislative proposal appears to follow the preferred option.

The impact assessment (IA) sufficiently substantiates the need for a revision of the CTD, and provides a well-evidenced problem definition relying on various data sources. It presents a sufficient range of policy options, which appear to present self-standing alternatives. The IA qualitatively and quantitatively assesses all policy options' economic, social and environmental impacts, and explains the methods used in detail. It openly explains limitations in the analysis, for instance regarding employment consequences in the road transport sector and quantification of the impacts specifically for SMEs. As the initiative is relevant to SMEs, an SME test was performed. However, SMEs are not differentiated by size-classes (micro, small and medium enterprises) in the analysis, and overall, SMEs could have been discussed more. In the comparison of options, the IA could have clarified the scoring and the coherence assessment. Likewise, the arguments for the choice of the preferred option would have benefited from further clarification. The summary of stakeholder consultations describes stakeholders' views on the problems, objectives and different measures; however, the IA does not provide a description of the stakeholder groups' views on the policy options.

ENDNOTES

¹ T. Jansen, [Revision of the Combined Transport Directive](#), EPRS, European Parliament, December 2023.

This briefing, prepared for the Committee on Transport and Tourism (TRAN), analyses whether the principal criteria laid down in the Commission's own Better Regulation Guidelines, as well as additional factors identified by the European Parliament in its Impact Assessment Handbook, appear to be met by the impact assessment. It does not attempt to deal with the substance of the proposal.

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