CHALLENGES AND SOLUTIONS FOR SUSTAINABLE TRANSPORT IN THE ERA OF NEW ENVIRONMENTAL REQUIREMENTS IN BULGARIA AND TÜRKIYE

Antoaneta Kirova¹, Selahattin Kosunalp²

Abstract: The background of the research is based upon the conclusions of the International Transport Forum (OECD, 2-21) that one of the big challenges for the environment comes from the transportation sector, which is responsible for approximately 23% of the discharged CO2 emissions; this quantity is expected to increase to 40% by 2030 and to 60% by 2050. The already expressed negative tendency is calling for new models for freight transport represented in the form of inter-modality. This means the logistics side of international economic relations, represented by land mode of transport (road and rail), inland waterways, short-sea shipping, and even airborne transport at short distances, should make use of viable combinations to decrease the harmful substances; it also concerns domestic transport policy which should stimulate non-road transportation solutions. The European Green Deal practically outlines the plan for the decarbonization of the economies of the member states of the union until 2050, with the aim of improving the well-being and health of European citizens and future generations with an accent over transport activities. Usually, logistics providers offer transport solutions, combining several modes, led by stakeholders' expectations for reduced time and costs of transferring goods, reliability, and frequency of services. The biggest challenge is to design a resilient transport network, where the users can easily switch between transport modes in real time, while there is enough evidence that combined transport solutions are in accordance with the contemporary requirements towards freight transport. Infrastructure investments, easing transborder connections and interoperability in general have a positive effect over the development of combined transport. This paper is addressing the opportunities and difficulties in employing combined transport solutions using the methodology SWOT-TOWS and applying the research results to the existing possibilities in Bulgaria and Turkey as a neighbor non-EU country in the role of advanced competitor in the development of

¹ Department of Management and Entrepreneurship, College of Management, Trade and Marketing, Sofia, Bulgaria, e-mail: a.kirova@mtmcollege.bg, ORCID 0000-0002-7799-423X

² Department of Computer Technologies, Gonen Vocational School, Bandirma Onyedi Eylul University, Bandirma, Türkiye, email: skosunalp@bandirma.edu.tr, ORCID 0000-0003-2899-4579

combined transport solutions. The conclusions confirm that economic development and its interaction and dependence on international logistics development is the most important factor of the environment encouraging or detaining the combined transport solutions. It also affects investments in transport infrastructure, the application of ITS and AI, the technological factors influencing the general trends of transport development and in particular, freight transport.

Key words: combined transport, "green" international logistics, transport policy, strategic analysis

JEL: R4, R49

DOI: https://doi.org/10.58861/tae.bm.2025.4.02

Introduction

According to the research of ITF about the Decarbonizing Transport Initiative, one of the big challenges for the environment is that the transportation sector is responsible for approximately 23% of energy-related CO2 emissions, which are expected to increase to 40% by 2030 and to 60% by 2050 (International Transport Forum, 2019). This negative tendency requires multimodal freight transport models in international logistics, represented by land mode of transport (road and rail), inland waterways, and also transport at short distances, both sea and air. Transport policy at the national level should stimulate non-road transportation solutions, a part of which are the new approaches in last-mile logistics.

Usually, logistics providers offer multi-transport solutions, combining several modes, led by stakeholders' expectations for reduced time and costs of goods transferring, reliability, and frequency of services. The difficulties arise from the already existing modal split due to political, economic and technological issues. The biggest challenge is to design a resilient transport network where users can easily switch between transport modes in real time. Still, in our opinion, logistics providers are already offering "green" solutions, creating a favorable environment for the choice made by clients.

The European Green Deal practically outlines the plan for the decarbonization of the economies of the member states of the union until 2050, with the aim of improving the well-being and health of European citizens and future generations. Part of it is the provision of efficient, safe, and environmentally friendly transport (European Council). This paper aims to discuss challenges and solutions for green freight transport based on multimodal solutions.

1. Literature review and methodology

Reducing the share of road transport on the way towards less polluting and more energy-efficient modes of transport is the main aim of European transport policy due to the negative consequences, due to the expected increase of road freight transport by 40% until 2030 and by over 80% until 2050 (Common Transport Policy). There is a strong support to intensify the use of multimodal solutions by multiple actions, which have proven their importance over time, such as:

- 1) The internalization of external costs in view that all the environmental outcomes connected with the surplus of transportation services should be covered in line with the polluter pays principle (OECD, 1975). A lot of measures have been performed towards internalization of external costs throughout the years, such as increasing taxes on heavy road vehicles, fuel taxes, etc. (OECD, 2022) The new trends in this field are linked to the effects of digitalization, aiming at highlighting the potential for making the mobility system more sustainable, showing the risks that could occur in cases of mismanagement (European Environment Agency, 2023).
- 2) More targeted infrastructure investments, aimed at better interconnections between the single modal networks. For instance, new projects envisaged by the CEF financial instrument of the EU will contribute to transport policy objectives such as enhancing major interoperable transport axes along the Core Network Corridors, improving safety and resilience of the network and increasing the capacity and performance of the rail, inland waterways and short sea shipping infrastructure, within an integrated multimodal transport system, with a view of obtaining the interconnections referred to;
- 3) Better use of information concerning traffic, capacities, availability of infrastructure, cargo and vehicle positioning.

In our opinion, combined transport is an adequate general response to the needs of resilient transport in the era of new environmental requirements. The definition of intermodal transport by OECD (OECD, 2006) is "movement of goods (in a single loading unit or a vehicle), by successive modes of transport without intermediate handling". Within ASEAN, combined transport is considered "the carriage of goods by more than two modes of transport without any handling of the freight when changing the modes through an intermodal transport chain with one single contract of carrier". In the USA, it refers to "Containerized Rail Transport". The definition by the EU Commission from the past century is "a characteristic of a transport system that allows at least two different modes

to be used in an integrated manner in a door-to-door chain" (1977). Combined transport (CT) is key to achieving a carbon-neutral transport sector in the context of the European Green Deal. Combined Transport, with a range of benefits, contributes to a better quality of life and proposes a seamless transport solution, improving the productivity of the entire chain. (UIC, n.d.).

An extended view over the definition, market structure, and key elements of combined transport is presented by the 2020 Report on Combined Transport in Europe (UIC, 2020), based mainly on containerization, accompanied or unaccompanied trucks, with an accent on the possibilities of extended use of railway transport. The geographic scope is also discussed, dividing the combined freight into internal (domestic) and international. The European freight transport market is envisaged, with proof of the role of international combined transport. The topic is further followed in the UIRR Report of 2023 (Patru).

The authors accept the definition for combined transport of Eurostat: "multimodal (combined) transport of goods in the same intermodal transport unit by successive modes of transport without handling when changing modes" which is reflecting, to the full extent, the role of transport in the logistics chain. The modal split is visualized by Fig.1.

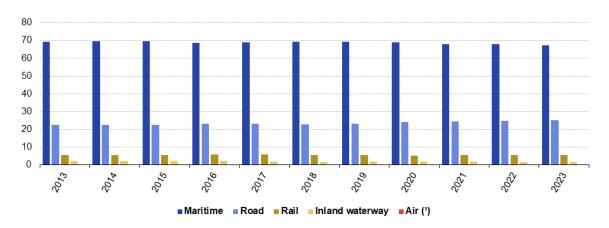


Figure 1. Freight transport modal split (Eurostat)

The data proves the role of maritime transport, with the biggest share in the international trade realization, followed by road transport, and still an insufficient participation of rail and inland waterways. Bearing in mind the opportunities of maritime transport to participate in international logistic chains with combined transport, the above-shown tendency is positive, but on the other hand, due to the limited share of rail and inland waterways, there is free potential for further development.

Due to the dynamics and urgent transition to digitalization in transport, the expectations are for the provision of better synchronized, smooth, and efficient transport services. The on-time information exchange is a further step towards cost optimization, energy savings, and above all, raising service quality.

Further, the big share of road transport with proposals for technological changes and transition to "low carbon combined transport" is discussed in a study of UIRR Zero Carbon Combined Transport (UIRR, 2025). Research on combined transport is done within UN ESCAP, by generating a multimodal transportation concept and a framework, proposing different definitions of combined transport. In fact, the number of definitions is one of the issues about combined transport in general.

In our opinion, the basic strength of combined transport is that it unites positive features of different modes, while eliminating the negative, thus cutting delivery costs, an important issue in international logistics chains. Combined transport becomes more important in view of the European Green Deal and the general tendency to diminish the destructive effects of freight transport on the environment.

To assess the situation about the combined transport from the point of view of its positive influence on business and the environment, the method SWOT-TOWS (Gonan Bozac, 2008) is applied, based on the results of secondary research. The outcomes are focused on strategic issues concerning the future of combined transport in the Republic of Bulgaria and the Republic of Turkey.

2. Situation analysis of the attitudes toward combined transport

As a result of deregulation, leading to the necessity of restructuring, refocusing, and changing business models, the private sector companies have taken the initiative in the field of inter-modality. Combined Transport is promoted within the EU, both legally and financially, providing support for projects relating to combined transport. The aim is to enable modal shift and reduce long-distance road freight transport through encouraging cooperation with rail transport and the other ecologically friendly modes; also, the achievement of the goal for transferring 30% of road freight over 300 km to other modes by 2030 and over 50% by 2050, outlined by EC transport policy in 2011 White Paper on Transport, is dependent on the good cooperation between different modes of transport and the seamless door-to-door freight services. The following types of actions support greater use of multimodal solutions:

- 1) Internalized external costs in all modes of transport, with a view to distributing them among the users, operators, and investors according to the "polluter pays" principle.
- 2) More targeted infrastructure investments, aiming at better interconnections between the single modal networks.
- 3) Better use of information (on traffic, capacities, availability of infrastructure, cargo, and vehicle positioning).

The public consultation carried out by the European Commission, based on an online questionnaire about the application of EU regulations over combined transport (Figure 2) showed different advantages and shortcomings, which are indicated in the SWOT table below.

Figure 2. Interested parties in Combined Transport (individuals, NGOs, public authorities, business associations, large enterprises, industry, SME ((KombiConsult GmbH, 2915)

As far as the organizational forms of combined transport are concerned, the coverage "land transport", followed in the transportation chain either by maritime transport or a combination "maritime/air transport", was supported. An interesting result came from the assessment of the short-sea shipping (SSS), which is generally encouraged by European transport policy (SSS) (European Union, Document 51998PC0414(01)) and the distance at which it will be applied. Also, tri-modal (or more) combinations, in particular road with rail + SSS and road with rail + inland waterway, are considered relevant.

The research results clearly determine that attitudes toward combined transport on the side of the interested parties listed above are positive overall, though still initiatives are more policy-driven than market-driven, with expressed preferences for logistics chains including land, sea, and air modes of transport.

3. SWOT-TOWS analysis of the combined transport in international logistics

The analysis starts with a SWOT Matrix for combined transport. Each of the quoted strengths, weaknesses, opportunities, and threats is carefully derived from secondary literature research and is evaluated by number 1. For quality analysis, all four categories are divided into three subcategories, namely organizational, economic (business) and legal, and the overall impact of them is calculated as a sum of the elements included in them. The results are also presented by a SWOT Graph.

Table 1
SWOT Matrix for combined transport

Strengths	Score	Weaknesses	Score
Organizational	4	Organizational	4
1) Technologies without transshipment	1	1) Reduction of the average speed of	1
for better protection of the transported		movement, due to the different possibilities	
goods.		and requirements in the individual modes of	
2) Standard, closed, sealed, and bar-	1	transport, included in a combined transport	
coded packaging reduces the risks of mis-		chain.	
sending goods.		2) Lack of sufficient capacity for carrying	1
3) The simplification of loading speeds	1	out combined transport (for example, block	
up the turnover, hence shorter delivery		trains) as well as appropriate infrastructure	
periods, and increases the commercial		(logistics centers, cargo villages for	
security of transport.		combined transport, offering conditions for	
4) Fewer inspections since containers	1	different loads).	
are subject to pre-control and accordingly		3) Insufficient administrative capacity of all	1
sealed.		interested parties to use the possibilities of	
Economic (business)	3	financial instruments, grants, and state aid.	
1) Further cost reductions (no vehicle	1	4) Insufficient personnel with appropriate	1
detention, decreased insurance fees) due		education and qualifications for the needs of	
to the lack of transshipment operations		combined transport.	
2) Delivery costs optimization through fuel		Economic (business)	2
savings and fewer loading and unloading	1	1) As per calculations in the National plan	
operations		for development of combined transport in	
3) Possibility of carrier choice to obtain the	1	Bulgaria until 2023, the direct costs of	
best rates for each route stretch		combined door-to-door transport, incl.	
Legal	3	overloading, on rail distances below 550 km	
1) Important issues solved, increasing the		are higher than those for road transport.	
possibility of using the ecological transport		2) Lack of equal and transparent access to	1
modes (rail and waterborne transport), and		private railroad terminals.	
reducing road accidents		Legal	1
2) Increased ability to negotiate terms per		Outdated bilateral border agreements that	1
stage or stretch of the route, since each		hinder the effective and efficient reception	
supplier is responsible for its service.		and transfer of freight trains and especially	
3) Single Contract of Carriage, though the		block trains, between container hubs	
carrier's liability is divided per stage of			
services.			
Overall score	10	Overall score	7

Opportunities	Score	Threats	Score
Organizational	6	Organizational	3
CT operations bring new ecologically acceptable and sustainable alternatives; increasing the use of rail	1	Delays in the implementation of projects for the modernization of port and rail infrastructure	1
transportation is expected to lessen the congestion levels and the harmful	: 	Part of the functioning industrial and newly constructed logistics areas are	1
emissions of noise and poisonous gases, such as CO ₂ . 2) Rail interoperability and deployment of	1	not connected to the railway network. 3) Technological and IT security inconsistencies (for example, regarding	1
ITS contribute to reducing costs for rail carriers.		the capacity of ports for simultaneous handling of container ships, automation,	
 Modernization of rail and port infrastructure, thus increasing the competitiveness of CT. 		working information channels, such as EDI and blockchains between ports, intermodal terminals, container lines,	
 Introduction of an electronic document exchange system to replace paper documents and stamping. 		customs, and other government institutions, warehouses, carriers, and use of Intelligent transport systems (ITS)	
5) Establishment of an electronic information exchange system at seaports, which will further bring an	i	Economic (business) Difficulties in the predictability of the costs and time for the passage of containers	1 1
increased efficiency in containerships processing.		through the ports, due to the existing customs system	
Economic (business)	3	Legal	2
The existing road, rail, and port infrastructure for combined transport provides good coverage of major.		Multiple definitions of combined transport leading to deviations between the interested parties.	1
production centers and urbanized areas, with assured connections to sea and river ports and airports	1	The different rate of accepting and implementing the control authorities' rules by the EC members (the	1
 International trade relations, served by developed container shipping over the past decade, with generally available land and port infrastructure capacity. 	;	"transposition act"); issues arising about the quantitative aspects of combined transport (in the quantitative field, concerning weights and measures of the	
Liberalized rail and road freight transport with multiple licensed carriers providing services in a highly	;	transportation process components)	
competitive environment.			
Legal	1		
Solving legal problems within the EU (the European Commission revised the	1		
Directive on CT in 2023 for a stronger support to the shift from road freight to			
lower emission transport modes such as			
inland waterways, maritime transport, and rail) (European Commission, 2023)			
Overall score	10	Overall score	6

The SWOT Graph clearly indicates that the right side, formed by the weaknesses and threats, is prevailing. This means that despite the political efforts and the general interest concerning combined transport, there are still issues for its application from the point of view of finding resilient solutions for international logistics chains.

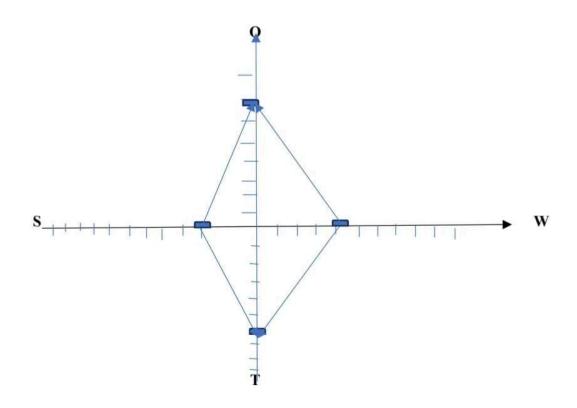


Figure 3. SWOT Graph

Further, the combinations between weaknesses/threats (W/T), strengths/threats (S/T), weaknesses/opportunities (W/O) and strengths/opportunities are developed with suggestions for strategic measures aimed at improving the existing situation and drive attention towards successful efforts for applying combined transport solutions in international logistics.

Table 2
TOWS Matrix for combined transport (suggestions for change management)

Weaknesses **Strengths** W/T S/T Comparing weaknesses/threats in Comparing strengths/threats in organizational, there is a good overall organization, we may propose a strategy to speed up the realization of investment projects progress determined by high quality and about the transport infrastructure to overcome the reliability of service, due to improved speed reduction, enable more capacity for carrying packaging, simplified loading operations and out combined transport, etc. Despite the efforts in no trans bordering. Policies should speed up this field, there are still issues, so, incentives to infrastructure renovation as well as the use the possibilities of financial instruments, grants establishment of railway connections to newly and state aid should be made aware to the constructed logistics areas so that the interested parties, like different forms of European strengths could be realized. The service financing, through proper orientation. Also, the lack reliability will be further improved through of specific infrastructure, such as logistics centers, future digitalization and automation of cargo villages for combined transport and new processes. container terminals in ports should be considered. Comparing strengths/threats in the The training of personnel for the needs of economic (business) field, the prospects for combined transport is another issue, bearing in cost reductions are real, due to speeding up mind the general withdrawal of trainees for the the turnover of vehicles and rolling stock, less transport sector. Also, technological barriers insurance payments because of the reduces connected with IT and digitalization should be risks while completing trans boarding and removed as a part of the general picture. loading. The choice of operators and rates Opportunities Comparing weaknesses/threats in the should also be considered. Hence, the only economic (business) field, we have to propose recommendation is for the improvement of the combined door-to-door transport to be included existing customs system, which is currently mainly in international logistics chains. Clients are slowing down the passage of containers easily discouraged if they find discrepancies or through the ports. unequal treatment in terminals, so measures Comparing the legal strengths/threats we should be directed to encourage private terminal focus on the ecological side and safety of operators to do their business transparently. As far combined transport, particularly if rail and waterborne transport comprise parts of the as customs operations are concerned, it is difficult to make suggestions or recommendations, only logistics chains, while limiting the participation of road transport, to reduce road accidents. that everything connected with border-crossings should be prepared correctly beforehand. Overall, there are positive signals for the Comparing the legal weaknesses/threats we users in terms of negotiating terms per stage recommend an urgent revision of the outdated of the logistics chain, while they can make a bilateral border agreements to make the process Single carriage contract. The existence of of transferring block trains between container hubs multiple definitions would not be considered in case of urgent transposition and more efficient. As far as the multiple definitions of combined transport are concerned, it is enough if implementation of technical rules by the in practical adaptation of combined transport, the control authorities of the different Member interested parties agree on one of the existing. The States transport policy of the different Member States should speed up the process of transposition and implementation of rules on combined transport since only unified rules would motivate the implementation.

W/O

Comparing weaknesses to opportunities in the | Comparing strengths to opportunities in field of organization, we can recommend furthering the achievement of rail interoperability, deployment of ITS, while putting strong efforts in the modernization of rail and port infrastructure, as well as of specific infrastructure (such as terminals) to increase the competitiveness of combined transport. The positive outcomes will solve the issues of average speed reduction, the insufficient capacity for carrying out combined transport. The introduction of electronic document exchange is another positive measure to ease the formalities. The issues connected to insufficient administrative capacity and personnel in general with appropriate education and qualification for the alternatives, if applied, are completely in needs of combined transport must be solved first of all by presenting a vision, in view of the increased digitalization and IT applications.

economic (business) field, there are stimuli for combined transport solutions on the demand side, such as developed international trade relations backed up by the supply side, represented by container shipping, licensed road carriers, etc., with numerous options to select carriers. Also, the transport infrastructure to be used by combined transport is comparatively well-developed. Further, comparatively good infrastructure coverage of the proposed business solutions should be based on lower costs due to less detention, lack of transshipment operations, and general savings on loading operations and fuel costs optimization. Comparing the legal weaknesses to the legal opportunities, we can suggest encouraging the shift from road freight to lower emission transport modes such as inland waterways, maritime transport, and rail by suitable policy measures. Also, to form better prerequisites for the use of railway transport in combined transport logistics chains, the outdated bilateral border agreements should be renewed, and the transfer of block trains, as well as other freight trains between container hubs made easier.

S/O

the field of organization, we can clearly identify the opportunities for a higher quality and security of transportation services, due to reduced risks in connection with loading/transshipment and introducing the electronic exchange of documents and information, which also contributes to speeding up deliveries. The favorable process is further backed up by infrastructure modernization and particularly by reaching railway interoperability. Besides the demand side, which expects better efficiency of operations, the combined transport accordance with the requirements for a sustainable and environmentally friendly transport process.

Comparing weaknesses to opportunities in the | Comparing strengths to opportunities in the economic (business) field indicates clearly that there are enough foundations to expect cost optimization on the side of clients, backed up by the rights to choose suitable carriers in a developed market (due to liberalization of trade and transport offerings), according to the needs as well as the transportation process.

> Comparing the legal strengths to the legal opportunities, we can identify the Single Contract of Carriage, divided into different stages, decreasing the role of road travel, and besides the increased role of ecological transport modes, such as rail and waterborne transport, a real intention to fight road accidents. A positive outcome linked with the shift from road freight to lower emission transportation modes such as inland waterways, maritime transport and rail is to be expected after the revised version of the Directive on CT is approved, maybe by the end of 2023.

4. Transferring the analysis results to the situation of combined transport in Turkey and Bulgaria

4.1. Combined transport in the Republic of Turkey

Located at the crossroads of Europe and Asia, the Republic of Turkey is one of the most important trading partners for countries on both continents, giving it a great advantage in both importing and exporting goods. As a peninsula which has coastal lines in Mediterranean, Aegean and Black Sea, the transport policy of Turkey is based upon the idea of a balanced transport system, integrating road, rail and maritime transport and providing opportunities for combined transport decisions.

The Republic of Turkey is among the most important trading partners of the Republic of Bulgaria outside the EU. In this regard, the Bulgarian-Turkish border, which is external to the Community, is among the busiest, and this leads to delays in supply chains and additional costs for businesses. In previous periods, in the field of Ro-La transportation, Holding Bulgarian State Railways developed technology for the transportation of freight cars by rail between the Halkali (Turkey) - Dragoman (Bulgaria) terminals, but the initiative never started.

Bearing in mind the role of combined transport for a resilient and sustainable freight transport system, the following recommendations are relevant:

- Further investments in renovation and modernization of railway infrastructure for improved access and connectivity of different types of transport infrastructure, and for the construction of new terminals for combined transport.
- Investments in rolling stock, such as general implementation of innovative technologies for combined transport, from organizational, such as block trains, to the equipment applied, including containers, swap bodies, semi-trailers, etc. For instance, benchmarking shows a widespread measure aiming at specialized rolling stock (wagons) for the carriage of intermodal transport units (such as Ro-La schemes).
- Tax relief for combined transport when the towing vehicle is transported by train.
- Liberalization of specific road corridors for the initial and final stages of Ro-La connections between terminals and nearby border stations (i.e. no bilateral authorization is required for the cargo transportation on these

- corridors, starting and ending between the nominated terminals of the Ro-La connections).
- Schemes and measures to reduce costs in combined transport (such as concessions on infrastructure charges, subsidization, and compensation for congestion costs).
- Introduction of fiscal incentives to reduce or exempt taxes, which should further motivate interested parties to use combined transport.

As far as the role of railway transport and the possibilities for inclusion in the international logistics chain, the Connecting Europe Facility (CEF), Cohesion Policy, and the Recovery and Resilience Facility (RESF) are suitable funding opportunities that can drive the much-needed modernization of the rail sector. In our opinion, in connection with the negotiations for future accession to the Community and in accordance with the White Paper on European Transport Policy from 2010, the Republic of Turkey actively supports initiatives in the field of combined transport, due to which there are considerable outcomes. First, "freight villages" were developed (Aksoy Okan, 2015) to ensure the enhanced attractiveness of combined transport, an increase in customer satisfaction, and the share of freight transportation, as well as the prevention of pollution. This is an example of good international practices, with potential to be applied in Bulgaria as well.

In Turkish national and international operations, different forms of intermodal transport can be distinguished:

- (a) Road-rail operations for the transport of containers, swap-bodies, semi-trailers, or trucks that are carried on Ro-La wagons.
- (b) Block train services and international container train services in Turkey are also developing in international logistics. Several national and international partnerships have been established, with the participation of operators, such as BALCO and the Turkish Chambers and Commodity Exchange Association. A "National Combined Transportation Strategy Document Draft" has been prepared under the EU Twinning Project for Strengthening Intermodal Transport in Turkey. In this context, it aims to establish a safe, sustainable, environmentally friendly and balanced. convenient, transportation infrastructure in Turkey. Considering the goals of Turkey in the period after 2023, the development of the railway network in the direction of block train transportation is very promising for the future in the name of increasing the cargoes of countries such as Turkey and China.
- (c) Roll-on-roll-off (RO-RO) maritime operations for the transport of lorries, semi-trailers, containers, or swap-bodies to ships on their own wheels or on wheels attached to them for this purpose. This also covers national

and international ferry services, including railway ferries and national short-sea shipping. Also, the importance of sea-rail inter-modality was studied based upon a case between Turkey and Italy, indicating that Turkey needs to invest in the rail connections of the ports.



Figure 4. RO-RO services in Marmara region (Source: Turkish Undersecretariat for Maritime Affairs)

The Republic of Turkey and the Republic of Bulgaria have been initiators of international RO-RO ferry boat services to Western Europe in the 1980s and the early 1990s. Consequently, there are already traditions established, and again, this is an example of good practice about the development of international logistics in times of political turbulence, leading to transportation issues, as was the case for road operators in the Balkan area at that time.

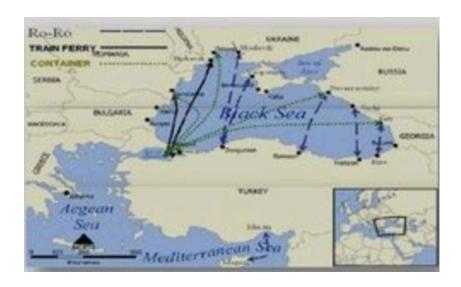


Figure 5. Combined transport of Turkey in the Black Sea region

4.2. Combined transport in Bulgaria

As a member of the EU, Bulgarian transport and forwarding companies, supported by the state authorities, are further exploring the opportunities of combined transport. Since the beginning of Black Sea rail ferry services in 1978, for over 39 years the service has been operated by the Bulgarian shipping company Navigation Maritime Bulgaria as a liner operator working within the framework of a triple intergovernmental agreement between Bulgaria, Ukraine and Georgia regarding operation of direct rail ferry service between ports of Varna (Bulgaria), Chornomorsk (Ukraine) and Poti/Batumi (Georgia). However, since the beginning of the Russian-Ukrainian war, this opportunity has been practically eliminated.



Figure 6. Rail ferry service of Bulgaria

The Ministry of Transport and Communications has launched a procedure to support intermodal operators and the development of existing terminals. The total amount of funding is 34.5 million leva, provided by the Transport Connectivity Program 2021-2027 (Ministry of transport and communication of Bulgaria, 2022). The program aims to support combined transport terminal operators by providing funds for the modernization and expansion of existing infrastructure. The grant for each project is from 1.5 million leva to 4 million BGL, with applicants receiving financial support from the Transport Connectivity Program up to 50% of the eligible implementation costs.

The funds are provided for the purchase of new zero-emission shunting equipment, the implementation of modern IT systems for transport management, and the improvement of the railway and road infrastructure of the terminals. The investments are aimed at all regions of the country, except for the South-West region (Ministry of transport and communications of Republic Bulgaria, 2025).

Conclusions

After presenting evidence that combined transport solutions are in accordance with the contemporary requirements regarding new models of freight transport at an organizational level, it is necessary to overcome geographic obstacles (land-sea-river connections) or to provide opportunities for an increased use of rail transport, combined transport has its potential for wider application in the international logistics decisions.

Infrastructure investments, easing trans-border connections and interoperability, in general, have a positive effect on the development of combined transport. These, however, must be supported by political decisions and economic measures directed both to the operators and the users to encourage the development of new alternatives and their urgent acceptance and implementations.

The decisive factor is economic development, and its interaction and dependence on international logistics, simultaneously encouraging combined transport solutions to protect the environment. The second important factor, closely following the first, is linked to the investments in transport infrastructure, the application of ITS and AI, and the technologies influencing the general trends of transport and particularly, freight transport.

References

- Duranlar, S., & Ananiev, S. (2017) *The experience of Turkey in block train transportation,* Available online: https://mtc-aj.com/article.1534 EN.en.htm
- EEA. (2022). *Transport and Environmental Report*, Available online:: https://www.eea.europa.eu//publications/transport-and-environment-report-2022
- EEA. (2022). *Transport Environmental report 2022*, Available online: https://www.eea.europa.eu/publications/transport-and-environment-report-2022
- EEAS. (n. d.). Eastern Partnership EEAS European External Action Service - European Commission Available online: https://eeas.europa.eu/headquarters/headquartershomepage_en/419/Eastern Partnership
- EUR-Lex. (1992). Council Directive 92/106/EEC of 7.12.1992 on the establishment of common rules for certain types of combined

- transport of goods between Member States, Available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0106
- EUR-Lex. (n. d.). 8th monitoring report on rail market developments Available online: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52023DC0510
- Europarl. (n.d.). *Common transport policy: overview*, Available online: https://www.europarl.europa.eu/factsheets/en/sheet/123/common-transport-policy-overview
- European commission. (n.d.). *Transport and the Green Deal* Available online: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/transport-and-green-deal en
- European commission. (n.d.). European Green Deal, Available online: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en
- European commission. (n. d.). Council Directive 92/106/EEC, seeking to promote Combined Transport operations through the elimination of authorization procedures and quantitative restrictions for Combined Transport operations, clarifying the non-application of road cabotage restrictions on road legs, providing financial support through fiscal incentives for certain Combined Transport operations; The Weight and Dimensions Directive (EU 2015/719), amending Council Directive 96/53/EC, providing Member States to permit movement of heavier intermodal load units by road when used in Combined Transport operations, Available online:
 - https://ec.europa.eu/transport/themes/logistics-and-multimodal-transport/multimodal-and-combined-transport_en
- European commission. (n. d.). *Public consultation on Combined Transport*, Available online:
 - https://ec.europa.eu/transport/sites/transport/files/media/consultations/doc/2014-combined-transport/summary.pdf
- Everett, S. (1992). "Deregulation, Competitive Pressures and the Emergence of Intermodalism", 9th World Conference on Transport Research, 22-27 July 2001, Seoul, Republic of Korea, Proceedings in CD.
- ITF. (n. d.) *Decarbonizing Transport Initiative*. Available online: https://www.itf-oecd.org/decarbonising-transport

- OECD. (2022). Consumption Tax Trends 2022: VAT/GST and Excise, Core Design Features and Trends, p. 4.2 Taxing vehicles and their use, p. 4.3 Taxation of road fuels, OECD Library,
- OECD. (n. d.). Available online: https://www.oecdilibrary.org/sites/28bdb664en/index.html?itemId=/content/component/28bdb664-en
- Pehlevan, Z., & Ricci, S. (2022). Best practices exchange in sea-rail intermodality: a case study of the ports of Izmir, Turkey and Trieste, Italy. 99-112. 10.2495/umt220091.
- SCS. (n. d.). Digitalization in transport logistics and combined transport, Available online:

 https://www.scs.fraunhofer.de/en/research/digitization-transport-logistics.html
- UIC. (2022). 2022 annual report on the implementation of the European Union's external action instruments in 2021, with an orientation towards the role of combined transport in international logistic chains, which is a huge step forward towards sustainable and ecologically friendly freight transport services, Available online: https://op.europa.eu/en/publication-detail/-/publication/f6c333e4-7b63-11ed-9887-01aa75ed71a1
- UIRR. (n. d.). Zero Carbon Combined transport, Available online: https://www.uirr.com/en/media-centre/leaflet-andstudies/mediacentre/2236-zero-carbon-combined-transport-study-byd-fine-.html
- Wisetruangrot, S. (2020). *Multimodal Transportation Concept and Framework, AFFA Logistics Institute,* Available online: https://www.affa-asean.org/hive/affa

ISSN 0861 - 6604 ISSN 2534 - 8396

BUSINESS DUSTINATION OF THE PROPERTY OF THE PR



PUBLISHED BY D. A. TSENOV ACADEMY OF ECONOMICS - SVISHTOV

4/2025

Editorial board:

Prof. Mariyana Bozhinova, Phd - Editor in Chief, Tsenov Academy of Economics, Svishtov, Bulgaria

Prof. Krasimir Shishmanov, Phd – Co-editor in Chief, Tsenov Academy of Economics, Svishtov, Bulgaria

Prof. Mariana Petrova, PhD - Managing Editor Tsenov Academy of Economics, Svishtov, Bulgaria

Prof. Borislav Borissov, DSc - Tsenov Academy of Economics, Svishtov, Bulgaria

Assoc. Prof. Aleksandar Ganchev, Phd - Tsenov Academy of Economics, Svishtov Bulgaria

Assoc. Prof. Irena Emilova, Phd - Tsenov Academy of Economics, Svishtov Bulgaria

Assoc. Prof. Ivan Marchevski, Phd - Tsenov Academy of Economics, Svishtov, Bulgaria

Assoc. Prof. Simeonka Petrova, Phd - Tsenov Academy of Economics, Svishtov Bulgaria

International editorial board:

Yuriy Dyachenko, Prof., DSc (Ukraine)
Olena Sushchenko, Prof., DSc (Ukraine)
Nurlan Kurmanov, Prof., PhD (Kazakhstan)
Dariusz Nowak, Prof., PhD (Poland)
Ryszard Pukala, Prof., PhD (Poland)
Yoto Yotov, Prof., PhD (USA)
Badri Gechbaia, Prof., PhD (Georgia)
Ioana Panagoret, Assoc. Prof., PhD (Romania)

Proofreader: Elka Uzunova

Technical Secretary: Zhivka Tananeeva Web Manager: Martin Aleksandrov

The printing of the issue 4-2025 is funded with a grand from the Scientific Research Fund, Contract KP-06-NP6/29/04.12.2024 by the competition "Bulgarian Scientific Periodicals - 2025".

Submitted for publishing on 17.11.2025, published on 18.11.2025, format 70x100/16, total print 80

- © D. A. Tsenov Academy of Economics, Svishtov, 2 Emanuil Chakarov Str, telephone number: +359 631 66298
- © Tsenov Academic Publishing House, Svishtov, 11A Tsanko Tserkovski Str



D. A. Tsenov Academy of Economics, Svishtov

CONTENTS

MANAGEMENT practice

CORPORATE TRANSPARENCY AND DISCLOSURE: METRICS OF MACEDONIAN JOINT STOCK COMPANIES Emilija Gjorgjioska, Margarita Janeska, Tatjana Spaseska, Meri Boshkoska, Violeta Gligorovski	5
CHALLENGES AND SOLUTIONS FOR SUSTAINABLE TRANSPORT IN THE ERA OF NEW ENVIRONMENTAL REQUIREMENTS IN BULGARIA AND TÜRKIYE	
Antoaneta Kirova, Selahattin Kosunalp	24
MANAGERIAL COMPETENCES IN REGULATED INDUSTRIES Aleksandra Kozlova, Olga Niemi	42
THE PRACTICE OF WEBROOMING IN GENERATION Z: EMPIRICAL ANAL'ON PERUVIAN BUYERS	YSIS
Aitana Maria Gonzalez Caceres, Maria Fe Portocarrero Mendoza	60
CLUSTER ANALYSIS OF E-COMMERCE IN THE EUROPEAN UNION COUNTRIES Zoya Ivanova	85
INSURANCE and Social Security	
FORECASTING THE EFFECTIVENESS OF NON-STATE PENSION FUND INVESTMENT STRATEGIES: THE CASE OF GEORGIA Asie Tsintsadze, Sofio Tsetskhladze	102
THE ARTICLES FOR THE YEAR XXXV(2025)	127