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Towards a unified regime for heavy duty transport EEA objectives for the potential revision of the EU Weights and Dimensions Directive

Introduction

Our members support the possible revision of the EU Weights and Dimensions Directive (96/53/EC) as a measure to strengthen the Single Market, accelerate the clean energy transition in line with the EU's climate objectives, address worsening labor shortages in the EU road transport sector, and enhance economic competitiveness.

The current Directive permits a maximum weight of 40 tons and a maximum length of 18.75 meters in national and cross-border traffic, although Member States may allow heavier and longer dimensions on their territory and in cross-border transport where that is bilaterally agreed. The EEA calls for a revision of the Directive that would establish a unified regime which permits heavier and longer dimensions across the European Union, both for domestic and cross-border use.

Key priorities for the revision of the Weights and Dimensions Directive

The EEA would like to underscore the following priorities for the possible revision:

A. Aligning the maximum weight and length threshold to at least 44 tons and 25.25 meters and allowing European Modular Systems throughout the EU27

Any revision should align and standardize the maximum weight and length for heavy duty vehicles (HDVs) respectively to at least 44 tons and 25.25 meters. It should also facilitate the use of European Modular Systems (EMS) – not only between consenting Member States – but throughout the EU, as envisaged in the Commission's Call for evidence for an evaluation and impact assessment published earlier this year, under the "Commercial vehicles – weight and dimensions (evaluation)" initiative.

The improved capacity, flexibility and environmental efficiency¹ of EMS could:

- Help the EU meet the growing transport demand which is set to significantly increase up to 2050,
- Address worsening labor shortages² that are increasingly affecting supply chains, and
- Contribute to the EU's climate targets and reduce the environmental impact of road transport.

¹ Studies, trials and use of EMS in EU Member States have indicated that they are comparatively more energy efficient, less expensive and more practical than regular trucks, while also improving congestion and having no additional impact on road safety or road wear. More information is available in this <u>brochure</u>.

² According to a 2022 <u>study</u> by Transport Intelligence, the EU faced an overall shortage of 380,000-425,000 truck driver positions in the EU at the end of 2021.

A common, standardized regime would provide the legal certainty needed to encourage investment in EMS and also eliminate the current fragmentation in the long-haul road transport market. It should be noted that data from EMS use and trials in the EU indicates that they are equally or even more safe than their conventional equivalents, particularly due to the special safety requirements that exist for these vehicles and the reduced trips required that result from their use (which also reduce any impact on infrastructure).³

B. Harmonizing technical criteria and procedures for EMS and facilitating take up of multimodal transport

Clear and harmonized EU rules for EMS use, including the certification of vehicles, the issuing of permits, training requirements and safety criteria, could reduce the uncertainty that currently exists at EU and national level. Today, EMS are subject to national or local approval and differing criteria in countries where they are in use.

In addition, an EU authorization of EMS could also encourage the take up and use of combined transport by increasing the efficiency and the compatibility of intermodal operations.

C. Ensure coherence with other EU initiatives to decarbonize road transport

It will be critical for the EU to ensure coherence between EMS rules under the revised Weights and Dimensions Directive and broader initiatives to decarbonize the EU road transport sector. These include the Alternative Fuels Infrastructure Regulation (AFIR), the revision of the Combined Transport Directive (CTD), and the upcoming revision of CO2 standards for HDVs.

Conclusion and next steps

An effective revision of the Weights and Dimensions Directive could harmonize the existing patchwork of national rules in place for heavy duty road transport, bringing legal certainty and flexibility to the sector at a time of growing demand and increasing supply chain instability. Through the use of heavier and more efficient loads, the EU could also reduce road transport emissions, limit traffic congestion and contribute positively to address other environmental impacts.

The EEA stands ready to work with EU and national policymakers to deliver the highly needed update of the Directive that works for businesses, citizens and the environment.

About the European Express Association

The European Express Association (EEA) represents the interests of the express industry in Europe. The express industry provides door-to-door transport and delivery of next-day or time-definite shipments, throughout Europe and the world. According to a 2020 Oxford Economics <u>study</u> on the impact of the express industry on the EU economy, the European express industry directly supported 330,000 jobs and an estimated 1.1 million indirect jobs in the EU in 2018, while generating \leq 24 billion in tax revenues for EU Member States' governments that same year.

³ A 2019 <u>report</u> by the International Transport Forum (ITF), under the auspices of the OECD, reviewed the existing data on safety performance of HCVs, including in key EU countries. The data indicates a reduced accident rate in all countries surveyed for HCVs compared to conventional vehicles.