

## EEA Position Paper on the Revision of Weights and Dimensions Directive 96/53/EC

### Introduction

The European Express Association (EEA) welcomes and supports the proposed revision of current Directive 96/53/EC on Weights and Dimensions (hereafter 'W&D'). The EEA would like to highlight its key priorities and takeaways from the proposed revision below.

### Key priorities

#### A. Transport efficiencies contribute to decarbonisation

The EEA sees the current fragmentation of the market for longer and heavier vehicles as a missed opportunity to further increase the efficiency of road transport operations; these vehicle combinations have the potential to contribute to the decarbonisation path of the sector, which is wished-for by both operators and its customers. This will further support the EU's overall climate objectives.

**Both setting an EU-wide maximum authorised weight of 44 tonnes instead of the current 40 tonnes for HDVs and introducing the application of the lowest common denominator principle for cross-border operations with the European Modular System (EMS) are steps that are strongly welcomed by EEA members:**

- The weight increase from 40 to 44 tonnes will lead to higher utilisation rates of available space in HDVs; these vehicles will thus be more efficiently deployed and have a positive impact on their environmental performance;
- The use of the EMS, including ecomobis and high-capacity vehicles are especially in cross-border traffic an evident choice for a more efficient and environmentally more sustainable operation. Key benefits from EMS use include:
  - Reducing emissions: -11% CO<sub>2</sub> emissions per transported ton<sup>1</sup> and 14% less NO<sub>x</sub> emissions;
  - Reducing fuel consumption: 10 - 15% less energy per tonne-km of freight transport<sup>2</sup> compared to normal heavy-duty vehicles,

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<sup>1</sup>Longer and Heavier Vehicles in the Netherlands, March 2010.

<sup>2</sup> FINAL REPORT, Effects of adapting the rules on weights and dimensions of heavy commercial vehicles as established within Directive 96/53/EC, Transport & Mobility Leuven, 2008.

- Reducing road traffic congestion: more goods transported (between 3% and 11%), while at the same time there are fewer vehicle kilometres (6% to 14%), in other words less traffic and less congestion<sup>3</sup>, and
  - Little effect on road wear: whilst two EMS can substitute three regular trailer trucks, the weight of an EMS is spread over more axles; besides, 60% of the goods transported by EMS are light individual goods (particularly in express networks), whereas for regular trucks this is only 10%.
- The European Commission proposal to support the cross-border deployment of these vehicle combinations between EU Member States which already allow these combinations in their domestic markets offers a pragmatic approach: Operators in countries which have embraced the concept of longer and heavier vehicles and have experienced their advantages, will be able to further deploy EMS cross-border without the cumbersome and time-consuming need for countries to conclude bilateral agreements. On the other hand, countries are also allowed additional time to upgrade existing and develop new infrastructure to accommodate EMS and gain experience through trials prior to deciding on allowing such vehicles.

These measures, if adopted, will not only positively impact efficiency *ergo* environmental performance, but they will equally play a meaningful role in tackling the driver shortage challenge.

## **B. The revision's focus should remain on Weights and Dimensions**

**The EEA is of the opinion that the proposed introduction of article 4b paragraph 3 establishing a link in the W&D to the CO2 emissions of HDVs is out of the scope of the W&D framework, and must remain in the on going and dedicated revision of the CO2 emission standards for HDVs.**

- The EEA is in favour of maintaining the 44 tonnes standard for all HDVs as well as the possibility to cross borders with EMS, irrespective of the technology used. The market for electric and hydrogen vehicles is in full development. EEA members will be transitioning to these cleaner and zero-emission technologies as they become operationally feasible and economically viable but insist that operational continuity is of the utmost importance; such operational continuity cannot be guaranteed by creating uncertainty about the operational lifetime of newly purchased vehicles. which is further substantiated when considering a review of the availability and use of such vehicles is also not foreseen in the proposed revision. Generally, zero-emission use timelines should not be set in isolation of three critical elements: (1) the range capabilities of zero emission trucks (in express transport, these vehicles are used on long distance), (2) the effectiveness and availability of public charging stations, and (3) the sufficiency and speed of power outage at charging stations.
- The CO2 standard reference could also have detrimental effects on companies' decisions to invest in heavier and longer vehicle combinations (EMS) – combinations which have the potential to reduce CO2 output as from the day they are deployed, and help to mitigate and protect against driver shortages – given the limited availability of zero emissions HDVs, let alone EMS. In this respect, the EEA believes that focus of the W&D should remain on the development of harmonized, and efficient rules for the weights and dimensions of HDVs.

## **C. Trialing period for cross-border EMS**

The EEA supports the European Commission proposed idea to facilitate cross-border trials with EMS. Trials have proven to be the best way to understand better the benefits of EMS and anticipate and deal with potential challenges triggered by their deployment. The European Commission proposes to limit

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<sup>3</sup> FINAL REPORT, Effects of adapting the rules on weights and dimensions of heavy commercial vehicles as established within Directive 96/53/EC, Transport & Mobility Leuven, 2008.

these trials to 5 years, whereas EEA would prefer an extendable trial period, so that EU Member States have ample opportunity to test (different) angles of EMS deployment.

#### **D. Harmonization of EU labelling and mutual recognition of EMS driver certificates**

Finally, to support improvements in road safety, the EEA calls for the standardization and harmonization of all labelling used to indicate weights and dimensions of HDVs. Currently, such labelling is nationally driven and risks confusion when used in cross-border operations. Harmonized practices would enable greater levels of clarity for all road users, further promoting the safety of HDVs, including EMS. Member States should be encouraged to cooperate to mutually recognise EMS driver certificates.

#### **Next steps**

The EEA calls on the co-legislators to avoid delays that may hamper the progress in the legislative procedures. It is imperative that as much progress on the file is made prior to the upcoming European elections. The EEA continues to remain ready and committed to provide constructive input and expertise throughout the legislative process.

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#### **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 [study](#) 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 €24 billion in tax revenues for EU Member States' governments that same year.*