

Objection to universal 44t dreams

UIRR emphatically objects to the position paper published by 17 German associations on 7 September 2018¹, which calls for making universal on German roads the 44-tonne gross vehicle weight permitted only for the road legs of combined transport chains.

Combined Transport road legs were granted a 2/4-tonne additional gross vehicle weight allowance in European law² with a view to

- Compensate the additional equipment weight of intermodal transport, and
- Noting that Combined Transport road legs are minimal in length, therefore the resulting heavier axles would not damage the roads excessively.

The issuing associations take no consideration of the exponentially increasing wear and tear that a 44-tonne gross weight HGV causes to the roads and bridges in case the 10% higher weight would become the norm. Nor are the logically ensuing higher road tolls mentioned in the paper.

Besides not offering to foot the bill for the costs of infrastructure, rather imposing on the taxpayer to extend the already considerable subsidy that is enjoyed by road haulage, the proposed measure would also undermine Combined Transport. The additional weight required by the intermodal technology means that in case the proposal was adopted the net cargo weight to be carried in Combined Transport would be less than on pure road transport. This is unacceptable as it would lead to a reverse modal shift from inherently safer non-road modes of transport to the road in the heaviest commodity category – including numerous dangerous goods shipments.

Switzerland calculates road tolls based on total weight, emission level and kilometres driven. The legally prescribed HGV tolls are calculated based on an algorithm³ contained in Swiss law. Accordingly, a fully laden EURO 6 truck has to pay 91 cents per vehicle kilometre today, while a 44-tonne variant €1. The toll for the same in Germany stands at 13,5 cents today.

UIRR calls on transport policy-makers in Germany and elsewhere in Europe to reject the proposed idea based on the considerations presented above. Moreover, a Swiss-style road toll calculation methodology should be adopted to correct the prevailing imbalances in charging for the use of publicly owned transport infrastructure.

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¹ <https://www.vci.de/langfassungen/langfassungen-pdf/2018-09-07-positionspapier-initiative-verkehrsentlastung-lkw-gesamtgewicht-44.pdf>

² <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32015L0719>

³ <https://www.ezv.admin.ch/ezv/en/home/information-companies/transport--travel-documents--road-taxes/heavy-vehicle-charges--performance-related-and-lump-sum-/hvc---general---rates.html>



Ralf-Charley Schultze

"The proposed unlimited circulation of 44-tonne gross weight trucks should not be allowed on the German road infrastructure as this would not only lead to accelerated road degradation, but disadvantage Combined Transport in the heaviest commodity segment. The resulting reverse modal shift to road would increase the safety risks in case of dangerous goods cargo and would ultimately accelerate climate change." - commented UIRR President Ralf-Charley Schultze.

Who is UIRR?

Founded in 1970, the **International Union for Road-Rail Combined Transport** (UIRR) represents the interests of European road-rail Combined Transport Operators and Transshipment Terminal Managers.

Road-Rail Combined Transport (CT) is a system of freight forwarding which is based on efficiently and economically inserting electric rail into long-distance (road) transport chains through the use of intermodal loading units (ILU).