

A strict no to the Weights and Dimensions Directive amendment

Changes in 2015 and in 2019 to the Weights and Dimensions Directive (WDD) **did not deliver** amidst the COVID pandemic, an energy crisis and the war in Ukraine. Perhaps more time would have been needed, yet the Commission produced another set of WDD amendments just 4 years after the last changes to the Directive. The proposed WDD amendments create again uncertainty while offering **regulated competitiveness to road**.

The proposed amendments – if left unchanged – **will do nothing more than protect the road sector's present market position**. The measures offered with the pretext of promoting intermodal freight transportation are again ineffective and inadequate. The best solution would be withdrawing the amendment proposal. If that does not happen, UIRR with all its members will propose a series of amendments to neutralise some of the worst expected damages at both European and Member State level.

The most important 3 amendments:

- 1. Only use longer and heavier trucks, where non-road alternatives do not exist:** incentives are needed so that European Modular Systems – giga liners or megatrucks – are used only where no alternatives exist. The long-distance inland transport market segment for lighter weight palletised cargo should be kept open to intermodal competition.
Giga liners limited to where they belong
- 2. Interoperability between the different transport modes** (a.k.a. "kombifähigkeit" or intermodal compatibility) of all technical dimensions or weight allowances, as well as the technical solutions that are offered must be a mandatory requirement.
Interoperability between modes is a must
- 3. Transparency should counterbalance heterogeneity:** a European Freight Transport Information Portal (EFTIP) should be established to provide information on the applicable rules in the Single European Transport Area and to provide an insight into the Member State choices enabled under the subsidiarity principle in the proposed amendment.
Transparency to support single market

Additional amendments of a technical nature or motivated by fairness and equality will be proposed later, while amendments will also be suggested to the proposed new CountEmissionEU Regulation and to the proposed amendment of the Combined Transport Directive (CTD) with the motivation of correcting some of the excesses of the WDD amendment. The 3 legislative proposals of WDD, CountEmissionEU and the CTD therefore belong together and should be addressed together in a package approach.

Objectives

1. “Operational efficiency improvement for trucks” – should mean
 - work on dominantly **shorter relations** where road haulage is indispensable,
 - the proposed changes should **not only translate to lower freight rates**, but should simultaneously
 - produce **meaningful progress towards the policy goals** facing the inland freight transport sector. These range from **decarbonisation**¹, through **energy efficiency improvement** and a **decoupling from fossil fuels**², as well as contributing to **cleaner air**³ and **reduced noise**⁴ all the way to **accident reduction**⁵ and **road congestion**⁶ reduction.
2. “Promotion of intermodal freight transportation” – which should improve the performance of door-to-door Combined Transport, where non-road modes carry the cargo on the long-distance section of the journey through:
 - enhanced **interoperability between modes**,
 - **compatibility with intermodal** requirements,
 - reinforced **certainty for investments** into road and non-road assets.

NO

Enhancements to long-distance trucking, which will **reinforce the high present-day market share of long-distance trucks**, while **undermining modal shift** to non-road modes. Some choices offered to Member States by the amendment will cause reverse modal shift – back to road.

Free competition

Regulated competitiveness should not safeguard market positions. In contrast, legislation should mandate **interoperability and intermodal compatibility** to enable competition based on full and free information and performance. The road sector should **not be allowed to monopolise** the market segment of (low density) palletised cargo carried over longer distances.

NO

Road vehicle weights and dimensions that are **not interoperable with non-road modes** may enable modest efficiency improvements in road-only operations, but promise to **cement the market position of long-distance trucking**. Examples of incompatibility include extended-length 14,90m or 15,00m long semi-trailers. The length, width and height of various railway assets and waterborne vessel sizes should be taken into account during type approval.

¹ European Green Deal, Fit for 55, European Climate Law (Regulation 2021/1119)

² REPowerEU Plan, Save Energy Communication (2022/240)

³ Recast Directive on ambient air quality and cleaner air for Europe (2022/542)

⁴ 15-20% of the EU population are exposed to road noise (<https://www.eea.europa.eu/publications/environmental-noise-in-europe>)

⁵ EU Road Safety Policy Framework 2021-2030 (2019/283) – “The EU’s long-term goal is to move as close as possible to zero fatalities in road transport by 2050”

⁶ Longer trucks will cause the same congestion as standard trucks as the area they occupy on the road is the same.

Reinforced intermodal competition

The European Commission understood that significant advances could be made along the entire spectrum of policy objectives that challenge transport policymakers through the **broader involvement of non-road modes such as electric rail freight and waterborne means**.

The intermodal transshipment techniques offer the most effective means to shift truckloads and half-truckloads of cargo between modes. This resulted in the second motivation for the WDD amendment: **promotion of intermodal freight transportation**.

NO

Additional weight (+4 tonnes) does not need to be loaded into intermodal loading units⁷ – only a marginal few shippers want this, while heavier loading units will make filling a 740-metre-long train even more challenging for Combined Transport operators. The railway infrastructure is optimally used if freight trains make use of the maximum possible length (740m), gross weight (2000t) and 4-metre clearance.

NO

Additional height (+30cm) is not only unnecessary, but it is technically incompatible with the 4-metre clearance standard of the road infrastructure, since the road transport of high cube containers is adequately resolved with gooseneck trailers.

NO

Additional length: longer trailers, for instance the 25,25-metre long ginaliners (a.k.a. European Modular System trucks) with a gross vehicle weight of 44-tonnes offer a useful cargo carrying capacity of about 30-tonnes, which makes them capable of carrying only the lightest loaded containers or empty containers. These systems are often not or only partially compatible with the existing terminal infrastructure – mostly located urban environments (access roads, interior roads on terminal premises).

NO

4-tonnes additional vehicle weight for electric trucks performing Combined Transport road legs is unnecessary since CT road legs are typically not longer than 100km, which do not require a range over 4-500km for the electric truck that performs it.

The European lawmakers should learn from the **North American example**⁸, where truck weights and dimensions in interstate circulation have stayed stable since 1984⁹.

⁷ Containers, (craneable) semi-trailers and swap bodies

⁸ <https://www.aar.org/wp-content/uploads/2020/08/AAR-Truck-Size-Weight-Fact-Sheet.pdf>

⁹ <https://www7.transportation.gov/testimony/truck-weights-and-lengths-assessing-impacts-existing-laws-and-regulations>

Intermodal freight transportation needs

YES

Stability to road vehicle weights and dimensions in order to confidently invest into intermodal assets such as transshipment technology, rail wagons and waterborne vessels. Public investments into all forms of transport infrastructure require the same stability.

YES

Weights and dimensions for electric trucks performing CT road-legs that enable the carriage of the widest range of intermodal loading units, including (craneable) semitrailers and 45-foot pallet-wide high cube containers.

YES

Full and easily accessible information on the regulatory framework of intermodal freight transportation in every EU Member State. Such a **European Freight Transport Information Portal** should include weights and dimensions information, as well as information on state aid and rules of non-road modes.

What Combined Transport asks for?



The amendments in the Weights and Dimensions Directive proposal should provide:

1. **CERTAINTY and STABILITY:** the optimal functioning of the Single European Transport Area requires that the weights and dimensions of neither mode change often and without good cause. Investment decisions into assets with multiple decades of design life require stability. Road sector assets have the shortest design life among the various modes of transport, therefore special attention should be paid to the requirements of non-road modes.
2. **INTEROPERABILITY and INTERMODAL COMPATIBILITY:** the rules on weights and dimensions, as well as the related type approval legislation, should prescribe a mandatory interoperability between the various modes of transport and a compatibility with intermodal transportation including transshipment terminals to the fullest possible extent as described in the applicable EN and ISO technical standards today.
3. **OPERATIONAL EFFICIENCY:** of road transport should focus on performance over shorter distances, and specifically in Combined Transport road legs, as well as over longer distances in sparsely populated peripheral regions, where non-road modes are unavailable.
4. **FAIR COMPETITION and TECHNOLOGY NEUTRALITY:** weights and dimensions rules should not be used to create an artificial pricing advantage, while sacrificing policy objectives of decarbonisation, energy efficiency improvement, fossil fuel decoupling, air- and noise pollution reduction, accident avoidance, congestion reduction, slower infrastructure degradation. Regulatory choices should take into account total system output considerations.
5. **FULL INFORMATION:** all information on Member State rules, specific conditions and state aid measures needed to operate freight transport within the Single European Transport Area through a user friendly internet portal.