JOINT STATEMENT

EU Citizens express strong opposition to the deployment of EMS on European roads.

The ongoing revision of the Weights and Dimensions Directive should aim at promoting the uptake of Zero Emission Road vehicles in a way that is fully aligned with EU climate and transport policy objectives, while protecting road infrastructure, and safeguarding rail freight and combined transport. However, the current positions of the European Commission, the European Parliament and the Council all include elements that risk opening the door to the wider deployment of longer and heavier vehicles - so called European Modular Systems ("megatrucks" or "gigaliners"). This raises serious concerns and runs counter to both the interests of EU citizens and the objectives of an interoperable and intermodal European transport system.

Public opposition is already significant. A recent EU-wide perception survey of 5,400 citizens across all 27 Member States shows overwhelming support for rail freight as the backbone of European logistics, while only 2% of respondents support the cross-border circulation of longer and heavier trucks. This finding is consistent with a 2024 survey conducted in nine EU Member States, involving more than 8,000 respondents, which found that over 60% of the French, Italians and Austrians oppose the deployment of megatrucks. The same study finds that:

- 73% believe megatrucks would accelerate the deterioration of road infrastructure.
- 68% anticipate negative effects on road safety.
- 85% expect increased risks for drivers, pedestrians and cyclists.
- 84% expect higher public spending for roads and bridges.
- 75% believe megatrucks would weaken rail freight by making road transport cheaper.

The legal text currently under trilogue negotiation does not adequately address the proposal's potential negative impacts on modal shift, intermodal terminals, road safety, infrastructure wear, congestion, or the interoperability between transport modes. Moreover, it risks undermining legal coherence by introducing substantive changes to the Weights and Dimensions Directive without treating it in parallel with the Combined Transport Directive (CTD), despite the fact that the two files are intrinsically linked.

If adopted without substantial safeguards, the proposed measures would:

- Undermine the modal share of rail and combined road-rail transport, jeopardising billions of euros already invested in sustainable infrastructure, including intermodal terminals.
- Accelerate the deterioration of road infrastructure, such as bridges, tunnels, and parking facilities, while worsening the working conditions and wellbeing of truck drivers.
- Increase congestion, CO_2 and pollutant emissions, and the risk of serious accidents on European roads, and
- Shift higher maintenance and infrastructure costs onto public budgets and taxpayers.

Europe needs safer and cleaner road transport solutions for its citizens that are fully interoperable with all modes of transport. For these reasons we, the signatories, urge the European institutions to consider the following strong recommendations:

1. **Establishing a robust framework for the deployment of intermodal-compatible zero-emission commercial vehicles**, ensuring that any additional strain on road infrastructure is minimised and strictly proportionate to technology weight. Any higher weight allowances must be limited exclusively to zero-emission vehicles (ZEVs), explicitly excluding Internal Combustion Engine (ICE) trucks, and should be differentiated where relevant to avoid infrastructure damage - an approach reflected in and supported by the Council position. Similarly, it is essential to follow the Council approach in rejecting any sunset or review clauses for additional weight allowances for ICE trucks, as such provisions risk prolonging the circulation of heavier ICE truck, creating legal uncertainty, and undermining rail freight and combined transport objectives. Incentives should support the decarbonisation of short road legs within combined transport, while encouraging rail for long-distance transport, an objective not yet explicitly reflected in the current institutional positions.
2. **Ensuring full compatibility and interoperability of commercial road vehicles with other transport modes**, enabling seamless door-to-door intermodal freight transport. This requires clear and enforceable limits on vehicle length and configuration, including a strict maximum cap on any length derogation, in order to preserve intermodal and rail compatibility, ensure trailer compatibility and guarantee the efficient operation of intermodal terminals.
3. **Introducing comprehensive ex-ante and ex-post impact assessments, supported by strict weight monitoring and enforcement mechanisms,** to effectively manage the transition towards a more efficient, resilient and high- performing European transport system. This is critical for any consideration of the European Modular System (EMS), in which regard the position of the European Parliament on these specific aspects of EMS is welcome. Moreover, these impact assessments must be based on common indicators to ensure consistency and comparability across Member States, EMS must remain under Member State control, be subject to robust safeguards, and automatic or uncontrolled cross-border operations of EMS and 44t vehicles must not be allowed. Any deployment of EMS must explicitly ensure full interoperability with combined transport and rail, an element that is currently missing from the positions of the EU institutions.
4. **Allocating revenues stemming from Weights and Dimensions infringement penalties to sustainable and combined transport**, as proposed by the European Parliament. This would directly support investments in intermodal infrastructure and reinforce the EU's climate, resilience and modal-shift objectives.
5. **Creating a European information framework that provides practitioners with the operational clarity needed** to plan and operate efficiently across modes and across borders.

The signatories

European Associations

National Associations