

POSITION PAPER – 31 October 2023

Proposal for a Revision of the Weights and Dimensions Directive (COM(2023)445)

Summary

The proposal for a revision of the Weights and Dimensions Directive should be used, in conjunction with the Combined Transport Directive, to incentivise the use of rail-road intermodal transport, the greenest and most energy efficient way to transport goods on long distance. Therefore, significant amendments are required to ensure this aim is reached as the text currently favours more polluting and energy consuming road only traffic, threatens rail-road interoperability, will generate other negative externalities and a substantial reverse modal shift.

The main suggested amendments are the following:

- Considering the Weight and Dimensions and the Combined Transport Directive as part of the same package.
- Rejecting the extra weights and length (if not explicitly linked for batteries) and the cross-border circulation of 44t trucks and European Modular System (if this is not part of an intermodal operation).
- Making weight sensors mandatory on all trucks.

Promoting alternatives to “road only” transportation

In consistency with the aims of the European Green Deal and the growth targets for rail freight set in the Sustainable and Smart Mobility Strategy, it is important that European legislation promotes the use of alternatives to “road only” transportation. The current proposal overwhelmingly favours road transport only and will contribute to further increase the [74% market share of road freight](#).

By introducing a set of measures leading towards bigger and heavier trucks, **the proposal will not only increase the competitiveness of the road sector, but also threaten rail-road interoperability, lead to reverse modal shift back to road, and generate a number of negative externalities that will largely surpass all the supposed green credentials of the text.**

While we are still waiting for the publication of the proposal for a revision of the Combined Transport Directive (CTD), ERFA calls to significantly amend the proposal for a revision of the Weights and Dimensions Directive (WDD) to make it a real instrument for the promotion of intermodality, energy efficiency and low externalities. ERFA also urges co-legislators to consider both directives as part of the same package and to wait until the publication of CTD to work on WDD.

The real impact of longer and heavier trucks

Allowing extra payload of trucks, the cross-border circulation of oversized European Modular Systems and 44-tonne trucks, and increasing the length of car transporters will not contribute to greening freight transport, but will rather lead to an increased number of negative externalities.

Trucks produce nine times more CO2 emissions and are seven times less energy efficient than a comparable journey carried out by rail. Longer and heavier trucks on European roads will also contribute to more accidents as heavy goods vehicles are already generating [more deaths in collisions than where accidents happen without involving vehicles transporting goods](#).

[Road infrastructure managers](#) have expressed their worries regarding the **higher cost of repairing highways** across the EU if the use of heavier and longer trucks is facilitated. It is worth noting that [road damages increase exponentially](#) with heavier trucks in a context where the revision of the Eurovignette directive has shown that society as a whole and not the road sector specifically is paying for most of the costs for investing and maintaining the road network.

The impact assessment of the Directive severely underestimates the potential reverse modal shift that will come with the implementation of the revised directive as shown in several studies. This **reverse modal shift from rail to road could even reach -38% for single wagonload traffic**. In France, the introduction of 44-tonnes trucks led to losses up to 13% for rail intermodal operators on the main Rhône Corridor.

Questioning the need for a revision

ERFA even questions the need for a revision of the Weights and Dimensions standards for trucks while in the USA, the biggest single market in the world, rules on these assets have not changed since 1982 and [the road sector there](#) is calling for a long-term stability on standards.

While the proposal argues that extra weights for trucks will enable to accommodate bigger batteries, it is worth noting that the previous revision of the Directive already allowed an extra two tonnes for batteries which is largely sufficient to be in line with the current technology and for a use of trucks that is focused on intermodal transport for long-distance journeys. Beyond batteries, these extra tonnes will only lead to bigger payload for trucks.

With all these points in mind, **ERFA calls for the rejection of the extra weights and lengths if not explicitly linked for batteries, the cross-border circulation of 44-tonne trucks and European Modular Systems between Member States authorising this traffic nationally and for the extension of maximum overhanging load length of vehicle transporters.**

More substantial measures for intermodal transports

Any revision of the weights and dimensions of trucks should take into account the fundamental need to ensure that any changes do not affect rail-road interoperability. The technical compatibility of trucks and trailers with rail transport, but also short sea shipping and inland waterways, involves several aspects: cranability, dimensions, foldability or retractability of protruding devices, and resistance to rail transport air pressure.



The measure of allowing high cube containers for intermodal transport is thought to compensate other pro-road provisions in the proposal but it is unclear if it will have an added value. There is a significant link to the TEN-T negotiations, and particularly the inclusion of P400 compatibility as an infrastructure parameter, which must be monitored. Without Member States committing to P400 on Core corridors, there is a risk this proposal will have little, if any, added value.

When it comes to the **cross-border circulation of 44-tonnes trucks, such traffic should only be allowed as part of the road leg of an intermodal operation**. This is the only way such vehicles will contribute to greener freight traffic.

[More stringent controls on road transport](#)

The proposal to increase the frequency of weight sensors across European roads acknowledges that there is currently a substantial problem with the real weights of trucks in the EU, but it fails to address it properly.

Unlike rail transport where the weight of every single wagon is checked for safety reasons, road transport benefits from very few enforcements of weight controls and [incompliances are frequent](#) when authorities implement checks along EU roads.

ERFA therefore calls for the proposal to reinforce the control of weight by **making the installation of weight sensors mandatory in every single trucks**. These sensors will be connected to the digital automatic tachograph which is already due to be installed on lorries circulating in the EU.

[Next Steps](#)

Given the strong link between the Weights and Dimensions Directive and Combined Transport Directive, ERFA urges policymakers to ensure these two files are treated and voted on as a package. This should mean **developments on the Weights and Dimensions Directive are postponed until the Combined Transport Directive is published**, allowing both files to be assessed in conjunction.