

Open public consultation on revising Directive 96/53/EC on weights and dimensions of heavy-duty vehicles

Fields marked with * are mandatory.

Introduction

[Council Directive 96/53/EC](#) (the Weights and Dimensions Directive) sets out, for road heavy-duty vehicles (HDV) circulating in the EU, the maximum dimensions in national and international traffic and the maximum weights in international traffic (international traffic is road transport between Member States).

The Directive was first adopted in 1996 to implement the single market for road transport, eliminate the adverse effects that the diverging standards in force in the Member States had on competition, and remove obstacles to traffic between Member States. The Directive harmonised the maximum weights and dimensions of HDVs in road transport, providing the right balance between achieving the economic objectives and protecting road safety and road infrastructure. The Directive was amended in 2002, 2015 and 2019 to extend its rules to HDVs for passenger transport, introduce measures to improve road safety and the working conditions of HDV drivers, and to reduce greenhouse gas (GHG) emissions thus contributing to achieving EU emission targets.

A potential new revision is included in the [sustainable and smart mobility strategy](#) and its action plan for 2022, under flagship 1 'Boosting the uptake of zero-emission vehicles, renewable & low-carbon fuels and related infrastructure'.

The Commission is evaluating the Directive to understand what is working well and what is not working as expected. The evaluation is based on the following criteria: relevance, effectiveness, efficiency, coherence, and EU added value. Depending on the outcome of the evaluation, the Commission may consider revising the Directive so that potential problems detected in the evaluation are addressed. Such a revision would be informed by an impact assessment of different policy measures and options.

The Commission is inviting the public and stakeholders to give their opinion on how well the existing Directive works and the possible objectives, policy measures and impact of a potential revision. You are welcome to expand on your answers in the spaces provided for this purpose. At the end of the questionnaire, you can also upload supporting evidence to complement your contribution.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* Type of company or organisation

- Road transport operator
- Rail transport operator
- Wagon supplier
- Intermodal transport operator
- Terminal operator
- Vehicle and original equipment manufacturer
- Road suppliers association
- Shipper and logistics company
- Express delivery company
- Technology developer
- Road infrastructure manager
- Other

* First name

Quentin

* Surname

Donnadille

* Email (this won't be published)

donnadille@clecat.org

* Organisation name

255 character(s) maximum

CLECAT

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

684985491-01

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|---|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
| <input type="radio"/> Austria | <input type="radio"/> Finland | <input type="radio"/> Mauritius | <input type="radio"/> Slovenia |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
| <input checked="" type="radio"/> Belgium | <input type="radio"/> Germany | <input type="radio"/> Montenegro | <input type="radio"/> Spain |

- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- | | | | |
|--|----------------------------------|--|--|
| <input type="radio"/> China | <input type="radio"/> Israel | <input type="radio"/> Papua New Guinea | <input type="radio"/> United Arab Emirates |
| <input type="radio"/> Christmas Island | <input type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Ascension and Tristan da Cunha | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Kitts and Nevis | |
| | | <input type="radio"/> Saint Lucia | |

* In addition to this public consultation, the Commission will organise targeted follow-up activities on certain topics with public and private sector stakeholders. Would you agree to be contacted for additional information?

- Yes
- No

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.**

Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Your experience with HDV weights and dimensions

1. How familiar are you with the Weights and Dimensions Directive?

- I have an in-depth knowledge, including its detailed legal aspects
- I have a broad knowledge of the main aspects of the Directive
- I have a basic knowledge of the main aspects of the Directive
- I have a general knowledge from a user's point of view
- I have no previous knowledge

2. How often do you work in the area of HDV commercial road transport?

- Regularly
- Sometimes
- Rarely
- Never

General assessment of the current Weights and Dimensions Directive

This first part of this questionnaire will help the Commission evaluate the current Directive. Questions are grouped around the five evaluation criteria: effectiveness, efficiency, relevance, coherence, and EU added value.

Effectiveness: how the Directive contributes to achieving its objectives

The Directive sets out maximum limits on weights and dimensions for trucks, trailers, semi-trailers, buses and coaches used in national and international traffic in the EU. It has the following objectives:

- ensuring the free movement of goods
- ensuring equal competition in the single road transport market
- protecting road infrastructure
- ensuring road safety
- improving working conditions of HDV drivers by improving comfort and safety of truck cabs
- improving energy efficiency and reducing greenhouse gas (GHG) emissions from road transport by promoting less polluting HDVs and improving aerodynamics and intermodal transport.

3. In your view, how effective are the standards set out under the Directive in achieving the following objectives?

	Very effective	Effective	Neither effective nor ineffective	Ineffective	Very ineffective	No opinion
Ensuring the free movement of goods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring equal competition in the single road transport market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Protecting road infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring road safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving working conditions of HDV drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving energy efficiency and reducing GHG emissions from road transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please briefly explain your answer

The objective of the Directive is to establish weights and dimensions requirements for heavy-duty vehicles to ensure compatibility across the European Union and a level playing field with respect to competition. CLECAT observes that the discrepancy between the maximum authorised weights in some Member States' territory and maximum authorised weight for cross-border transport hinders the free movement of goods, leading to inefficiencies and higher emission. This makes that the Directive is no longer aligned with new priorities of the EU on decarbonisation.

Efficiency: costs and benefits of the Directive

4. The Directive's main objectives are to implement the single market for road transport, improve road safety, protect road infrastructure, improve drivers' working conditions, and promote more energy efficient road transport.

In your view, to what extent has the Directive generated benefits in these areas?

	It has generated substantial benefits	It has generated moderate benefits	It has not generated any benefits	No opinion
Ensuring the free movement of goods	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring equal conditions of competition in the internal (intra-EU) road transport market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting road infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring road safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving working conditions for HDV drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving energy efficiency and reducing GHG emissions in road transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please briefly explain your answer

The Directive provided some benefits to the sector in view of common standards (aerodynamic cabins). More harmonisation of vehicles, transport units and weights and dimensions would generally benefit the sector. CLECAT notes that especially with respect to efficiency improvements, the circulation of longer and heavier vehicles (HCT, EMS) should be supported with the provisions, which would ultimately also benefit road safety and protect road infrastructure.

5. What do you think about the costs caused by the application of the Directive? (Costs may include but are not limited to: installation/maintenance and, when applicable, certification of weight in motion systems; administrative costs of national

permits for transporting indivisible loads; costs of installation/maintenance of aerodynamic devices).

- I have not witnessed significant costs
- Costs are reasonable and proportional to the benefits
- Costs slightly outweigh the benefits
- Costs significantly outweigh the benefits
- I don't know

6. Do you think it is possible to reduce costs caused by the Directive?

- Yes
- No
- I don't know

Relevance: do the objectives still reflect current and future needs?

This section also asks you to identify new needs that have arisen since the Directive was adopted and objectives to respond to those needs.

7. In your view, are the Directive's objectives still relevant in addressing current and emerging needs and challenges?

	Very relevant	Somewhat relevant	Neutral	No longer relevant	No opinion
Ensuring the free movement of goods	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring equal conditions of competition in the internal (intra-EU) road transport market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting the road infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring road safety	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving working conditions for HDV drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving energy efficiency and reducing GHG emissions in road transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. In your view, what new needs or challenges are not addressed by the current Directive?

The structural shortage of drivers affecting the road logistics supply chain is not addressed.

Coherence: how consistent are the Directive's rules with each other and with other European/international laws in the same area?

9. In your view, are there any contradictions or inconsistencies between the different rules of the Directive?

- Yes, there are many contradictions between the different rules
- Yes, there are some contradictions between the different rules
- No, there are not any contradictions between the different rules
- I do not know

Please explain your answer

The Directive allows for higher maximum authorised weights for alternatively fuelled or zero-emission vehicles, but it is regulated in a complex manner that makes it hard to enforce the rules. There are also difficulties with making sure that 45-foot containers fit in the current framework whereas in theory the rules do allow for this type of containers. Finally, as noted above the cross-border use of EMS is constrained by the current Directive, and vehicles combinations have not been specifically mentioned.

10. In your view, is the Directive consistent with other EU policies and objectives (e.g. [European Green Deal](#), [sustainable and smart mobility strategy](#), the [EU road safety policy framework 2021-2030](#), [legislation on the type approval of road vehicles](#), [Combined Transport Directive](#)) and other international initiatives(e.g. [Sustainable Development Goals](#))?

- It is fully consistent with other EU policies and international initiatives
- It is partially consistent with other EU policies and international initiatives
- It is not consistent with other EU policies and international initiatives
- It contradicts other EU policies and international initiatives
- I don't know

Please explain your answer

To reach the ambitions of the European Green Deal, it is crucial that the Directive promotes the shift to multimodal transport by increasing the maximum weight of lorries taking part in all multimodal transport operations across the EU, including intermodal and combined transport, to 46 tonnes.

CLECAT believes that there is an inconsistency with the general sustainable and smart mobility strategy as a possible measure for reducing GHG emissions whilst decreasing the road freight transport costs is using longer and heavier vehicles, which is currently not allowed across the EU for international road freight transport. This follows the basic principle that it is more efficient to transport large volumes consolidated into full truckloads, than transporting low volumes and part loads.

EU added-value: the need for EU action to stimulate or complement action by Member States

11. To what extent do you agree with the following statements

	Fully agree	Slightly agree	Neither agree nor disagree	Slightly disagree	Fully disagree	Do not know
EU action is essential to achieve significant results in the context of weights and dimensions of HDV for commercial road transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU action is essential for effective cross-border cooperation and to ensure the smooth functioning of the internal market	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU action is essential for keeping roads safe for all road users	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU action is essential to improve the environmental performance of road transport	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU action is essential to reduce GHG emissions in the entire transport sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Impact assessment and known problems to address

This section focuses on identifying potential improvements to the Directive.

After the evaluation, which assesses how the Directive has been working until now, an impact assessment may be carried out to analyse options to tackle known problems.

Transport is a key strand of the single market, allowing for the free movement of goods and passengers across borders. For oversized and overweight vehicles, the current patchwork of national and bilateral /multilateral rules on maximum weights and dimensions risks undermining the smooth functioning of internal transport, leading to fragmentation of the market.

Road transport is responsible for around 72% of total transport GHG emissions, with 26% coming from HDVs (6% of total EU CO2 emissions).

The current patchwork of rules seems to cause ineffective and inconsistent enforcement of cross-border transport rules for HDVs. This seems to be the result of a lack of legal certainty (i.e. what is and what is not allowed) and discriminatory monitoring.

12. In your view, how significant are these known problems?

	Significant	Minor	Not a problem	No opinion
Fragmentation of the market for heavier and bigger (freight) transport vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road transport produces a high share of GHG emissions in the transport sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ineffective and inconsistent enforcement of cross-border rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Not enough support for intermodal transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. In your view, are there any additional problems that should be addressed by the Weights and Dimensions directive?

- Yes
- No
- I do not know

* If yes, please explain your answer:

The structural shortage of drivers, which is expected to get even worse in the coming years, could be addressed by authorising the use of longer and heavier vehicles.

14. The Commission has identified a series of measures that could address the known problems above. In your view, how useful would the following measures be in tackling them?

	Very useful	Quite useful	Neutral	Quite detrimental	Very detrimental	No opinion
A. Increase the maximum weights and dimensions to the limits most commonly allowed in the EU	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A1. Only automatically authorise cross-border transport of heavier/longer vehicles between the neighbouring Member States that allow their circulation in national traffic (i.e. not an EU-wide rule)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
B. Simplify and/or harmonise administrative procedures (e.g. for issuing national authorisations for the transport of indivisible loads)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C. Adapt technical standards to the needs of zero-emission vehicles (e.g. additional length, weigh and/or axle weight to accommodate zero-emission technologies)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C1. Create more incentives to increase the use of alternatively-fuelled and zero-emission HDVs (e.g. by permitting increased loading capacity)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D. Create incentives to drive the use of aerodynamic and other energy- saving technologies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D1. Make the use of aerodynamic and other energy- saving technologies mandatory	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
D. Create incentives to drive the use of aerodynamic and other energy- saving technologies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D1. Make the use of aerodynamic and other energy- saving technologies mandatory	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
E. Adapt technical standards to the needs of intermodal transport to ensure a level playing field with only-road transport (e.g. permitting extra height to facilitate transporting high-cube containers or ensuring the compatibility of road transport vehicles as loading units)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

E1. Create more incentives to encourage intermodal transport (e.g. permitting increased loading capacity to vehicles involved in intermodal transport)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
F. Allow the circulation of European Modular Systems (combinations of standard vehicles of up to 25.25 metres long with/without additional weight) in cross-border transport in the EU to make transport more efficient	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
G. Set out safety requirements for cross-border transport of oversized and overweighed vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
H. Use digital technologies to facilitate compliance with rules and automated checks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I. Revise the European Best Practice Guidelines for Abnormal Road Transports	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer for measure A(1)

CLECAT proposes to increase the general 40-tonne weight limitation for border crossings in the EU to 44 tonnes. We also maintain that the EU legal framework should not overrule national rules on weights and dimensions and should not restrict the possibility to authorise cross-border transport operations with heavier /longer vehicles between consenting Member States that allow their circulation in national traffic.

Please explain your answer for measure B

CLECAT would support an extension of the scope of the Directive to exceptional transport (i.e abnormal loads) as this type of transport would benefit from harmonisation of legislation and rules, with regards to permit-granting procedures.

Please explain your answer for measure C(1)

CLECAT is of the view that the wider use of longer and/or heavier vehicles should not be limited to alternatively fuelled trucks. The Directive should remain technology neutral and should not favour a specific propulsion technology over another by allowing heavier loads. However, alternative powertrains, especially zero-emission vehicles, require higher weights and therefore entail a potential loss of payload. It is therefore important to adjust the provisions to maintain the payload and a level playing field with conventional trucks.

Please explain your answer for measure D(1)

Providing length allowances for aerodynamic devices could contribute to the reduction of fuel consumption and CO2 emissions of heavy-duty vehicles. This solution is optimal for long and medium-distance operations. However, there could be increased costs for operators, such as workshop maintenance, due to inadaptable infrastructure when loading, circulating and unloading goods.

Please explain your answer for measure E(1)

CLECAT would welcome the increase of the maximum weight of lorries taking part in all multimodal transport operations across the EU, including intermodal and combined transport, to 46 tonnes. It is essential that a scheme for authorising heavier loads for multimodal transport should be introduced uniformly throughout all Member States. Special attention should be paid to the cross-border application of such authorisations to avoid situations in which a Member State does not accept a heavier load authorisation granted by another Member State on its territory.

In addition, the Directive should allow for more type of combination to use in intermodal transport operations, such as entire trailers fitted on trains. As such, mixed operations for rail transport (conventional wagons, containers and entire trailers put together on a same train) should be allowed and supported- ideally at EU level - to promote multimodal transport and a shift to rail.

Please explain your answer for measure F

CLECAT believes that the wider use, including cross-border application, of EMS combinations in road freight will contribute to improved efficiency and reduced environmental impact through increased fuel efficiency and accompanying CO2 reductions. This will help operators and customers alike optimising the utilisation of trucks and trailers, road infrastructure capacity, and integration with other modes of transport such as rail, air, inland and short-sea shipping for the door-to-door total logistics solutions. Therefore, it is important to authorise the use of EMS for international transport across the EU territory.

Please explain your answer for measure G

Please explain your answer for measure H

CLECAT would support further efforts in the area of transport digitalisation. Under the current system, providing a list of paper-based transport documents is burdensome and bureaucratic. For example, the requirement for authorities to approve a multimodal transport operation by means of a stamp on a paper transport document can be replaced by providing the necessary information in digital format through an eFTI platform. In addition, the use of digital tools can allow road enforcers to conduct better targeted checks and maximise the efficiency of roadside inspections.

Please explain your answer for measure I

The guidelines on abnormal road transport (from 2008) should be reviewed according to the most recent national legal developments. A harmonised framework for permit granting procedures should be proposed.

15. In your view, are there additional measures that could address the known problems?

- Yes
- No
- I don't know

16. Several Member States allow longer (and sometimes heavier) vehicle combinations in different configurations (e.g. an articulated truck with a trailer) to improve transport efficiency and reduce GHG emissions from road transport (as the same quantity of goods can be transported with fewer vehicles). These vehicle combinations, known as European Modular Systems (EMS), are not allowed in cross-border traffic as a general rule.

Do you think that the circulation of EMS in the EU should be allowed to increase transport efficiency and to reduce GHG emissions from road transport?

- Yes, they should be allowed in all Member States in national and in international traffic
- Yes, they should be allowed in all Member States in national and in international traffic, but only on certain parts of the network
- Yes, they should be allowed in all Member States in national and in international traffic, but with additional road safety measures in place (e.g. equipped with additional safety features, excluded from urban areas, etc.)
- Yes, they should be allowed in all Member States in national and in international traffic, but only if this is complemented with other greening measures (e.g. zero-emission powertrains, improved aerodynamics)
- Yes, they should be allowed in all Member States in national and in international traffic, but only for road legs of intermodal transport
- Yes, but only in international transport between neighbouring Member States that allow them in national traffic. Member States that do not allow EMS should not be obliged to accommodate them
- No, they should not be allowed in international traffic
- I do not know

Please explain your answer

The Directive should not restrict the cross-border use of EMS vehicles between consenting Member States only. We would support to authorise the use of EMS vehicles for international transport in the EU as a general rule, at least along the TEN- T core and comprehensive network.

17. Do you think that using longer and/or heavier vehicles under the European Modular System (EMS), which also makes road transport more efficient and therefore cheaper, will lead to any of the following effects?

	Strongly agree	Slightly agree	Slightly disagree	Strongly disagree	No opinion
The volume of road freight (in tonne-kilometres) will increase further	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Some freight transport will switch from rail, inland waterways or short sea shipping to road	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road safety will be negatively affected due to the size of the vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your answer

One possible measure for reducing the GHG emissions and simultaneously decreasing the transport costs is using longer and heavier vehicles. This follows the basic principle that it is more efficient to transport large volumes consolidated into full truckloads, than to transport low volumes and part loads.

As the overall demand for freight transport is expected to significantly increase over the next years/decades, there is a need to absorb this demand by all modes of transport. Therefore, whereas the use of EMS vehicles may lead to an increase of road freight transport this will not negatively affect freight carried by rail, inland waterways or short sea shipping as all modes of transport will need to be used to their full potential. In CLECAT's view, each action, which could provide efficient improvements and emission reductions for transport sector must be considered.

Finland and Sweden are also allowing even longer and heavier vehicles, referred to as high-capacity vehicles (HCVs) or high-capacity transport (HCT) (25,25m long and 44 tonnes or above).

The current EU rules on maximum weights and dimensions of heavy-goods vehicles limits a more efficient use of the current road infrastructure. It does not allow the cross-border use of High-capacity vehicles beyond two consenting Member States. As such, CLECAT encourages policies that allow the high-capacity transport system in the international road freight transport, as this is both a practical and a cost-effective measure to reduce CO₂ emissions. CLECAT would also encourage better connectivity between HCT in road and rail freight in support of intermodal transport.

As the demand for freight transport in the EU is expected to increase over the next few decades, there will be a need to make better use of the existing infrastructure in all modes of transport. Allowing HCVs, designed to carry more cargo than standard trucks, could thus provide a highly effective solution. The HCVs have the potential of reducing costs and offering higher productivity than regular heavy goods vehicles, as they can consolidate freight from smaller trucks, consume less fuel and produce less emissions per unit of cargo transported. For example, two or three HCVs may carry as much cargo as three to five standard vehicles. It has also been estimated that HCVs can reduce carbon emissions per unit of freight by 15-40%, depending on the vehicle configuration and use. As a result, this makes HCVs more cost-effective and environmentally friendly than regular vehicle combinations.

We refer to recommendations from the International Transport Forum in its report 'High Capacity Transport Towards Efficient, Safe and Sustainable Road Freight' from 2019. The report concludes that High Capacity Vehicles provide an opportunity to improve transport efficiency by increasing the cargo capacity of the vehicle, carrying higher mass, volume or both. Fewer truck trips are required per freight task, which reduces truck travel, lowers carbon dioxide and NO_x emissions, cuts fuel use and lowers shipping costs.

Finally, several studies conclude that there is no clear evidence that LHVs would decrease road safety, and LHVs might even improve safety due to reduced truck mileage (see for example the Steer report from 2013 "A review of megatrucks – Major issues and case studies" for the European Parliament.)

Other aspects

18. Are there any other aspects of the Directive that the Commission should consider?

19. Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here. The maximum file size is 1 MB.

Please note that the document will be published with your reply to the questionnaire, which is the main input to this public consultation. The document is complementary and is background reading to understand your position better.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

MOVE-C1-SECRETARIAT@ec.europa.eu