

## **The European Voice of Freight Logistics and Customs Representatives**

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Brussels, 9<sup>th</sup> of November 2010

### **EU standardisation of trailer height to 4 metres**

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CLECAT is the largest umbrella organisation of its kind in the EU. It represents the interests of the vast majority of EU logistics, freight forwarding and Customs service enterprises ([www.clecat.org](http://www.clecat.org)).

CLECAT would like to comment on the potential effects of standardising the height of all semi-trailers built under Whole Vehicle Type Approval to 4m as we feel that there were two distinct elements to this issue. For international movements on Continental Europe, it was accepted that due to bridge heights, 4 metres was the normal operating height particularly in the Netherlands even if there are also a number of occasions in the continent when trucks exceed 4 metres high, especially at the front of the trailer. However, our UK member BIFA (British International Freight Association) recently expressed their concern as within the United Kingdom many trailers are taller, with heights of 4.2 and 4.3 metres being common place. This allows UK trailer operators to load two decks instead of one, making the industry more cost efficient, fuel efficient and environmentally friendly. As a result, BIFA is worried that limiting trailers to 4 metres will increase the number of trucks on the road thus negatively impacting on congestion and pollution levels.

The higher vehicles are particularly used in the distribution of palletised traffic and parcels. Limiting trailers to 4 metres will therefore negatively impact, in particular, the pallet and supermarket distribution networks. On average the current fill rates on pallet networks is 80% according to the Association of Pallet Networks. With the introduction of the mandatory use of single deck trailers, it is estimated that this fill rate would decline to approximately 50%. To move the same amount of goods will require more trucks and drivers, and hauliers may have difficulty recovering all these additional costs.

The rumour of limiting trailer height to 4 metres has caught the UK road and trailer industry by surprise. Such a proposal from the European Commission would be hidden within the Type Approval Regulation which aims to simplify the rules and improve vehicle standards, not impose arbitrary standards that disadvantage one Member State. Within the road environment, the UK has different regimes to Europe, for instance trailer length and even which side of the road to drive on, therefore, CLECAT, on behalf of BIFA, strongly believes that the UK must be allowed to retain and build the higher trailers to ensure the efficient, economically and environmental sensible distribution of freight within the UK.

A Commission's proposal on this issue would be universally opposed by the UK's freight and transport related trade associations and Government. Mr Mike Penning, UK Transport Minister has stated "I share the concerns of UK industry about any proposal which would limit the height

of new trailers to four metres. Any such proposal seems to go beyond the Commission's remit to simplify existing legislation." Such limitation would not only be economically damaging, but also run counter to its avowed aim of reducing the amount of truck movements and emissions.