

## Cefic position on the revision of the weight and dimensions directive.

The revision of the Weight and Dimensions Directive is important to incentivize zero emission transport in both road and combined transport. Additionally, heavy duty road freight transport needs harmonization and increased efficiency by eliminating the regulatory barriers in cross border transport.

### 1. Road only transport

The revision of the Weight and Dimensions Directive should incentivise the uptake of clean and zero emission transport. Cefic proposes allowing (max) gross weight (MGW) of 44 ton for road trucks, depending on the emission level of the combustion engines (see table). Additional weights should be allowed for alternative and zero emission vehicles, as foreseen in the current Directive, depending on the ongoing technical developments in this area.

#### MGW for road transport based on vehicle emission standards

Road only	2022	202X	203X
40 ton	<Euro 5	<=Euro 5	<=Euro 6
44 ton	>=Euro 5	>=Euro 6	0 emission

#### Additional weight allowance

+1 ton	for alternative fuels (HVO, LNG/CNG)
+2 ton	for 0-emission truck

Cefic fully supports the proposed policy measures to increase the maximum allowed dimensions to 25.25mtr for European Modular Systems (EMS) trucks in cross-border transport. Cefic proposes to have this allowance linked with the emission standards of the engine used.

The current limitation of maximum weights to 40 tonnes for cross-border transport creates inefficiencies and a competitive disadvantage compared to national transport. This cross-border weight limitation should be removed when neighbouring countries allow for higher maximum weights within their territory.

### 2. Combined transport

The additional weight allowance for combined transport (CT) compared to road-only transport should be maintained as an incentive for modal shift to rail or inland waterways. Therefore, Cefic proposes to increase the maximum weight of the first and last road leg in CT to 48 tons. This maximum weight should also be linked to the emission standard of the engine used (see table below).

The higher MGW in combined transport supports the promotion of combined transport and reduction of infrastructure congestion. Additionally, it contributes to reduce the impact of truck driver shortage. However, combined transport must also become more reliable to achieve this modal shift.

**MGW for road leg in Combined Transport, based on vehicle emission standards**

CT road leg	2022	202X	203X
44 ton	<Euro 5	<=Euro 5	<=Euro 6
48 ton	>=Euro 5	>=Euro 6	0 emission

**Additional weight allowance**

+ 1 ton	for alternative fuels (HVO, LNG/CNG)
+ 2 ton	for 0-emission trucks

Cefic believes that there are no major technical obstacles to handle heavier containers up to 34-36 tons in combined transport operations. Nevertheless, it's recommended to study if there aren't new technical obstacles in relation to infrastructures and lifting capabilities on terminals.

Cefic suggest inserting a requirement that new trailers must be craneable. This will stimulate combined transport and make it more efficient. However, the technical requirements for these trailers (e.g. additional metal reinforcements) should not lead to a reduction of the allowed MGW.

**3. Additional proposals to include in the revised Weight & Dimensions Directive:**

- Cefic supports the use of aerodynamic technologies to further reduce the GHG-emissions. Nevertheless, Cefic recommends to define clear requirements on the benefit of aerodynamic technologies regarding energy savings, before allowing higher vehicle dimensions. The usage of aerodynamic technologies should not have a negative impact on the maximum allowed weight and dimensions of transport equipment.
- Cefic supports the promotion of electric trailers as they save around 16% energy consumption. However, they require heavier equipment which should not lead to a reduced maximum allowed payload.
- Member States should be stimulated to upgrade road infrastructure, making them suitable for heavier and longer HDV transports, at least along the comprehensive TEN-T network.
- A level playing field must be secured by aligning maximum weights and dimensions across the Member States. Enforcement must be simplified by implementing digitalized border crossing procedures. Drivers qualified for driving heavier and/or EMS-truck combinations should have their qualifications mutually recognized.

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About Cefic  
 Cefic, the European Chemical Industry Council, founded in 1972, is the voice of large, medium and small chemical companies across Europe, which provide 1.2 million jobs and account for 16% of world chemicals production.