

The revision of the Weights & Dimensions Directive can reduce emissions of heavy duty vehicle transport, by increasing road transport efficiency and incentivising the use of contributing fuels and technologies

Cefic welcomes the revision of the Weight and Dimensions Directive which aims to increase road transport efficiency, combined with incentivizing the uptake of low- and zero-emission vehicles. Furthermore, it is essential to enhance the harmonization and efficiency of heavy-duty road freight transportation by removing regulatory obstacles in cross-border transport.

Key challenges

1. The provision allowing vehicles weighing 44 tons to operate until 2034, regardless of their emission standard or fuel type, needs careful consideration, with a focus on incentivizing investments in alternative fuels and technologies, such as CNG, LNG, e-fuels, biofuels, H2... In particular, the Directive revision should complement the regulations which already aim to decarbonize CO₂ emissions of heavy duty vehicles (HDV). For example :
 - o Regulation 2019/1242 relating CO₂ standards and performance for new HDV
 - o Directive (EU) 2023/959 amending Directive 2003/87/EC (ETS II for road transport)
 - o Regulation (EU) 2023/1804 of the European Parliament and of the Council of 13 September 2023 on the deployment of alternative fuels infrastructure (AFIR)
 - o Proposal for a Regulation on type-approval of motor vehicles with respect to their emissions and battery durability (Euro 7)

2. The provision to regulate the timeline for higher weights alongside the use of zero-emission vehicles in 2035, should be part of the application of the existing regulations above, and not introduced as a standalone provision in this Directive. Moreover, certain technologies, especially battery electric or fuel cell vehicles, when coupled with (un)loading activities in ATEX zones and the transportation of ADR goods, require careful consideration regarding their acceptability. Therefore, introducing specific technologies or deadlines in an isolated manner may lead to confusion and added complexity.
3. The use of alternative fuels and technologies should also be the drivers to incentivize intermodal transport. The maximum weight for HDV in intermodal transport, using fuels and technologies which contribute to the decarbonization of road transport, should be 48 tons as from the entry into force of the revised Directive.
4. The current provision to limit weights to 44 tons or 48 tons for cross-border transport does not require infrastructural investments. Therefore, this provision should immediately enter into force after the date of publication of the revision of this Directive.
5. The Directive should clarify on the possibility for Member States to retain the authority to authorize cross-border transport operations involving heavier, longer, or taller vehicles between countries that permit their use in national traffic. This could create inefficiencies and a competitive disadvantage for cross-border transport compared to national transport. Any cross-border weight limitation should be removed when neighboring countries allow for higher maximum weights within their territory.

Proposed solutions

1. Additional Weight and Length for alternative fuels or technologies
 - o Cefic welcomes the Commission's proposal to grant an additional 4-ton weight allowance and extend the maximum vehicle length by 90 cm for zero-emission vehicles. However, we have concerns regarding the time limitation of this increase until 2034. Restricting this benefit, as from 2035, exclusively to electric and hydrogen vehicles may pose challenges. Transport industry has informed about uncertain application of necessary infrastructures and alternative technologies in 2035 for this type of HDV. Despite ongoing technological

advancements, the existing fleet availability and infrastructure capacity might not be adequately prepared to facilitate this transition.

- The Directive should therefore refrain from favouring a specific propulsion technology and, instead, should consider provisions for alternative fuel vehicles with lower emission impacts compared to conventional carbon fuel vehicles. These provisions should incentivize investments in cleaner fuels and technologies, in alignment with current legislation regarding CO2 standards and performance for HDV, the alternative fuels infrastructure regulation, etc.
- For combined transport, Cefic welcomes the Commission's proposal, for an extra weight of 4 tonnes, up to 48-tonnes for zero-emission vehicles, and increased height up to 30 cm for high cube containers. However, we consider it appropriate, as referred with road only transport, to incentivize other short- to medium-term opportunities that promote a gradual and in any case ambitious change in decarbonizing transports. In particular, here too we consider it appropriate to reward investment in and authorize the use of alternative fuels that make a significant contribution to achieving the targets set.

2. European Modular System (EMS)

- Cefic welcomes the proposal to facilitate the use and cross border transport of the European Modular System, but this should not be restricted to cross-border trials with five-year duration with no possibility for renewals.
- Member States should not be allowed to impose additional national requirements on cross-border EMS traffic.

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

- Member States should be incentivized to improve their road infrastructure, ensuring it can accommodate new technologies for electrical and hydrogen vehicles, heavier and longer Heavy-Duty Vehicle (HDV) transports, especially along the extensive Trans-European Transport Network (TEN-T).
- In the view of incentivizing the use of EMS across Europe, qualification for drivers operating heavier and/or European Modular System (EMS) truck combinations should be universally recognized.

Conclusion

Cefic welcomes the Commission's proposal objectives to reduce administrative burdens and potential delays for operators, to harmonize the single market and especially foster the transition for the decarbonization of transports. For this reason Cefic encourages to view the revision of the Directive with direct and active link to other acts which regulate the availability of alternative fuels, technologies and infrastructure.

Cefic is convinced that the proposal can be successfully implemented and its goals can be achieved with the support of all Member States. This will involve incentives for the development of necessary supportive infrastructure, reevaluation of the derogations as from 2035 for zero-emission vehicles, and paying attention to the development of alternative technologies and solutions, especially those that are adaptable to the current environment and can play a pivotal role in reaching the intended goals.

Contact: [Joost Naessens, Director Transport & Logistics, +32 473 64 65 57, jna@cefic.be](mailto:jna@cefic.be)