

## Position paper of the European Clean Trucking Alliance ahead of the Commission's proposal for a revision of the Weights and Dimensions Directive

The European Clean Trucking Alliance (ECTA) welcomes the planned revision of the Weights and Dimensions Directive as a complementary piece to the decarbonisation of road freight transport alongside ambitious CO<sub>2</sub> standards for heavy-duty vehicles, both being key tools to drive the transformation towards zero-emission road freight transport.

An ambitious revision of the Weights and Dimensions Directive will further build the case for ambitious CO<sub>2</sub> standards for heavy-duty vehicles. Adopting the directive will allow truck manufacturers to build zero-emission vehicle with sufficient weight for storage and powertrain technologies of their vehicles, hence making sure that zero-emission vehicles will get additional range without losing payload. For actors in the freight and logistics sector, eager to deploy clean and future-proof vehicles for all their operations and herewith contribute to the EU's climate targets, this is key to guarantee that zero-emission freight vehicles can outperform on an operational level their equivalent diesel vehicles. In order to reach the EU's climate neutrality objective in 2050, and considering the continuous growth of transport demand, the overwhelming majority of the emission reduction will come from the sales of zero-emission vehicles.

The current weight allowance of 2 tonnes for zero-emission drive trains allows zero-emission trucks (ZETs) already today to carry battery packs which are powerful enough to be used for urban and regional deliveries, making ZETs an effective, cost-competitive, and ready technology for various operations today. Yet, some additional weight allowance is needed to unlock long-distance zero-emission trucking.

In addition, the European Commission in its proposal should focus on:

- The total vehicle weight for long-distance ZETs should be temporarily increased.
- A temporary increase of drive axle weight to zero-emission drivetrains, with mitigating conditions and phase-out timeframes.
- Harmonize cross-border traffic for zero-emission trucks to the lowest allowed vehicle weight between neighbouring countries.
- Assess the need for a length extension for zero-emission vehicles.

### **The total vehicle weight for long-distance ZETs should be temporarily increased.**

Some additional weight allowance is needed to fit heavier battery packs to unlock long-distance zero-emission trucking (>400 km). Up to one additional tonne should be given to zero-emission vehicles with drivetrain ranges of 400 km or more<sup>1</sup>. This temporary allowance is based on the zero-emission range of the vehicle, meaning that 2.5 kg extra weight is given per additional kilometre above 400 km of range. The additional allowance should be capped at 1 more tonne and would greatly aid the roll-out of 800 km range trucks (400 x 2.5 kg being 1 tonne). Assuming the full allowance is used, it means a maximum allowance of 3 tonnes to the drivetrain of zero-emission vehicles<sup>2</sup>. The increase in weight allowance for zero-emission vehicles should only be granted to maintain an equal payload and a level playing field with conventional drivetrain technologies.

From 1 January 2025, the maximum weight of zero-emission light duty commercial vehicles will be increased if the additional weight (the “excess reference mass”) is due only to the mass of the energy storage system, for example, the battery.<sup>3</sup> And under proposed reforms to the EU Driving License Directive, holders of Cat B licenses could drive such vehicles in all Member States after two years of holding such a license – once the total mass does not exceed 4.25t.<sup>4</sup> The Commission is asked to check that any follow-on changes in the Weights & Dimensions law are made, i.e. that such vehicles will not be considered as HGVs in situations where law-makers intend them to be considered as LDVs under parallel reform.

The recommendations made by ECTA regarding the additional zero-emission weight allowance for the total vehicle weight and drive axle (see below) should of course also apply for intra-country national transport.

### **A temporary increase to zero-emission drive axles.**

The maximum authorized drive axle weight<sup>5</sup> should be increased by 0.5 tonnes, subject to conditions (meaning a total of 12 tonnes). This should be a time-based exemption with a phase out by 2029 for trucks, in line with expected technology and efficiency improvements. To mitigate road wear and ensure safe operations, three tyre-related conditions are recommended: first, wide-base tyres on the steering axle; second, dual (or twin) tyre assembly on the drive axle, and third, a requirement to deploy a Tyre Pressure Monitoring System (TPMS) that alerts the driver to a loss of pressure any more than

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<sup>1</sup> ‘Zero-emission range’ is now being certified as part of VECTO emissions assessment, hence it is possible to grant additional weight according to the amount of ZE range provided.

<sup>2</sup> This translates into an additional 1 tonne compared to the already 2 t exemption for zero-emission drivetrains existing already today.

<sup>3</sup> Please see Article 2(1)(b) of Regulation 2019/631.

<sup>4</sup> Please see the Commission’s proposal of 1.3.2023. [Link](#).

<sup>5</sup> To mitigate road wear, today’s maximum authorised drive axle weight is limited to 11,5 tonnes.

0.5 bar. Moreover, it should be mandated that a pressure loss of more than 0.5 bar on such a vehicle is to be redressed at the nearest available facility having regard to the direction of travel. Finally, an acceleration limiter needs to be deployed on such vehicles to avoid fast take off (which would cause higher damage to roads).

### **A regulation can harmonize the patchwork of cross border traffic rules.**

The patchwork of weight allowances across the EU makes the transport of goods across borders increasingly complex for transport operators and logistic service providers. It hinders the free movement of goods, leading to inefficiencies and higher emissions. This makes the Directive no longer aligned with new EU priorities such as decarbonisation of transport. As well as undermining the Single Market, the existing patchwork of national rules has also led to legal and investment uncertainty.

It should therefore be considered to transform the Directive into a Regulation to ensure coherent implementation across all EU member states. In certain regions of the EU, successful attempts at harmonization of rules make road transport more efficient. A way to at least ensure more coherence is to use the lowest weight allowance of neighbouring countries as the denominator and apply it to the border crossing with the exemption for zero-emission vehicles to be added automatically.

### **Check vehicle length provisions support zero-emission deployment.**

In 2020, the Weights and Dimensions Directive was already reformed to permit longer trucks once such new vehicles respect the European turning circle and deliver improvements on aerodynamics, energy efficiency, safety and driver comfort (known as the “Art 9a revision”). No change may be necessary, but the Commission is urged to re-assess those provisions for their compatibility to support zero-emission vehicle roll-out.

In short, the Weights and Directions Directive can be a strong complementary tool to further build the business case for zero-emission trucks, ensuring that ZETs will be able to cover all ranges, harmonizing zero-emission transport rules across Europe and increasing efficiency of the transport system overall.

**More the European Clean Trucking Alliance (ECTA)**

The European Clean Trucking Alliance is a coalition of over 35+ companies and organisations active in logistics, consumer goods, manufacturing, retail and supply chain management from across Europe calling for zero-emission road freight.

For more information, please visit the website: [www.clean-trucking.eu](http://www.clean-trucking.eu)



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