

Reaction paper of the European Clean Trucking Alliance to the Commission's proposal for a review of the Weights and Dimensions Directive

The [European Clean Trucking Alliance](#) (ECTA) welcomes the Commission's proposal to review the Weights and Dimensions (W&D) Directive, which aims to promote the uptake of zero-emission heavy-duty vehicles.

Additional weight limits for zero-emission trucks, if co-legislators amend the proposal to make them fully applicable, will ensure all long-haul routes can be served by zero-emission trucks without ever losing payload to their equivalent fossil-fuelled trucks. By guaranteeing zero-emission trucks outperform their diesel counterparts on all routes, the W&D Directive can stimulate their demand from actors in the freight and logistics sector, eager to deploy clean vehicles and contribute to achieving EU climate neutrality by 2050.

To date, zero-emission trucks can benefit from an extra 2-tonne allowance granted in 2019. This makes zero-emission trucks a cost-competitive and ready technology especially for urban and regional operations. Yet, due to heavier batteries needed for longer driving range, extra weight is key to allow all truck manufacturers to produce zero-emission models for long-distance trucking with equal payload to their diesel counterparts.

Therefore, the Commission proposes to increase the extra 2-tonne allowance to 4 tonnes. The proposal also increases by 1 tonne the maximum load on the driving axle of zero-emission trucks.

However, the 4-tonne allowance for zero-emission trucks is undermined by proposed Article 4b, which fails to guarantee its full use. Moreover, the requirement to apply the 4-tonne allowance only across borders, rather than in each member state, further limits the uptake of zero-emission vehicles. Finally, it is our opinion that the 1-tonne increase in driving axle weight goes beyond the required amount by industry, and consideration should be given to reducing the additional allowance to 0.5 tonne to mitigate road wear.

For zero-emission trucks to become a viable operational option both at national level and cross-border, ECTA supports a more ambitious approach in the following areas. ECTA asks lawmakers to:

- Enable zero-emission trucks to fully utilise the 4-tonne weight allowance.
- Apply the zero-emission allowance not only cross-border but also within each member state.
- Adjust the increase in the weight of the zero-emission driving axle of trucks.

Enable zero-emission trucks to fully utilise the 4-tonne weight allowance.

Current rules set a 40-tonne cross-border weight limit for 5- and 6-axle vehicle combinations (+2 tonnes if zero-emission). If they are involved in intermodal operations, the limit may be 42 / 44 tonnes (+2 tonnes if ZE).

The Commission proposes to increase the zero-emission weight allowance to 4 tonnes for zero-emission vehicle combinations. However, the proposed Article 4b severely limits its application, denying any real incentive to use zero-emission vehicles over fossil-fuelled trucks.

Member states that domestically allow combustion trucks exceeding 40 tonnes must also permit the entry of combustion trucks of the same weight from neighbouring countries to a maximum of 44 tonnes. This however rules out the full use of the allowance for zero-emission trucks: whenever a zero-emission truck exceeds 40 tonnes, as per the cross-border allowance described above, it will not be able to fully utilise the 4-tonne allowance over a combustion truck, unless payload is lost. The comparative incentive for zero-emission trucks is thus removed, and diesel trucks will continue to be the only viable operational option.

To ensure the full application of the 4-tonne allowance for zero-emission vehicles, member states may bilaterally agree on a maximum limit between 40 and 44 tonnes for the cross-border movement of fossil trucks only if they guarantee the extra 4-tonne zero-emission allowance above their bilaterally agreed maximum weight for fossil vehicles.

Apply the zero-emission allowance not only cross-border but also within each member state.

While the additional 4-tonne weight allowance is allowed for cross-border movements (notwithstanding the previous point), there is no indication from the proposed W&D review that the 4-tonne zero-emission weight allowance would apply to vehicle movements within the territory of each member state.

Allowing its use to cross-border movement only would partially stimulate the uptake of zero-emission trucks, leaving domestic freight transport with heavy payload in the hands of fossil vehicles.

The new W&D Directive should encourage member states to apply the additional 4-tonne zero-emission allowance at national level as well to make zero-emission trucks more attractive for operators and ensure consistency between freight activity in the EU and in each member state.

Adjust the increase in the weight of the driving axle of new zero-emission trucks.

The permissible weight of the driving axle of new zero-emission trucks needs to be increased due to the heavier zero-emission powertrain attached to it.

The Commission proposes to increase the maximum driving axle weight to 12.5 tonnes for zero-emission trucks, meaning an increase of 1 tonne.

To mitigate road wear, co-legislators should limit the increase to 12 tonnes, meaning an increase of 0.5 tonne compared to today. To further protect against wear, co-legislators need to make this increase conditional on a number of safeguards such as type of tires to be used, their pressure and an acceleration limiter.

The limited increase in the weight of the driving axle should also be phased-out in 2029. This sunset clause is in line with expected technology and efficiency improvements and will incentivise manufacturers to gradually shift to a so-called “clean sheet” design of more efficient zero-emission trucks, making the increase in the zero-emission driving axle less important.

More about 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



European Clean Trucking Alliance

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secretariat@clean-trucking.eu