

Open public consultation on revising Directive 96/53/EC on weights and dimensions of heavy-duty vehicles

Fields marked with * are mandatory.

Introduction

[Council Directive 96/53/EC](#) (the Weights and Dimensions Directive) sets out, for road heavy-duty vehicles (HDV) circulating in the EU, the maximum dimensions in national and international traffic and the maximum weights in international traffic (international traffic is road transport between Member States).

The Directive was first adopted in 1996 to implement the single market for road transport, eliminate the adverse effects that the diverging standards in force in the Member States had on competition, and remove obstacles to traffic between Member States. The Directive harmonised the maximum weights and dimensions of HDVs in road transport, providing the right balance between achieving the economic objectives and protecting road safety and road infrastructure. The Directive was amended in 2002, 2015 and 2019 to extend its rules to HDVs for passenger transport, introduce measures to improve road safety and the working conditions of HDV drivers, and to reduce greenhouse gas (GHG) emissions thus contributing to achieving EU emission targets.

A potential new revision is included in the [sustainable and smart mobility strategy](#) and its action plan for 2022, under flagship 1 'Boosting the uptake of zero-emission vehicles, renewable & low-carbon fuels and related infrastructure'.

The Commission is evaluating the Directive to understand what is working well and what is not working as expected. The evaluation is based on the following criteria: relevance, effectiveness, efficiency, coherence, and EU added value. Depending on the outcome of the evaluation, the Commission may consider revising the Directive so that potential problems detected in the evaluation are addressed. Such a revision would be informed by an impact assessment of different policy measures and options.

The Commission is inviting the public and stakeholders to give their opinion on how well the existing Directive works and the possible objectives, policy measures and impact of a potential revision. You are welcome to expand on your answers in the spaces provided for this purpose. At the end of the questionnaire, you can also upload supporting evidence to complement your contribution.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech

- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* Type of company or organisation

- Road transport operator
- Rail transport operator
- Wagon supplier
- Intermodal transport operator
- Terminal operator
- Vehicle and original equipment manufacturer
- Road suppliers association
- Shipper and logistics company
- Express delivery company
- Technology developer
- Road infrastructure manager
- Other

* First name

Jenni

* Surname

Ranhagen

* Email (this won't be published)

jenni.ranhagen@transportrad.se

* Organisation name

255 character(s) maximum

Näringslivets Transportråd (Swedish shippers' council)

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

*** Country of origin**

Please add your country of origin, or that of your organisation.

- | | | | |
|---|---|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |
| <input type="radio"/> Aruba | <input type="radio"/> Faroe Islands | <input type="radio"/> Martinique | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Australia | <input type="radio"/> Fiji | <input type="radio"/> Mauritania | <input type="radio"/> Slovakia |
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| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> Somalia |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Africa |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Korea |
| <input type="radio"/> Belarus | <input type="radio"/> Georgia | <input type="radio"/> Mongolia | <input type="radio"/> South Sudan |
| <input type="radio"/> Belgium | <input type="radio"/> Germany | <input type="radio"/> Montenegro | <input type="radio"/> Spain |

- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine

- | | | | |
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| <input type="radio"/> China | <input type="radio"/> Israel | <input type="radio"/> Papua New Guinea | <input type="radio"/> United Arab Emirates |
| <input type="radio"/> Christmas Island | <input type="radio"/> Italy | <input type="radio"/> Paraguay | <input type="radio"/> United Kingdom |
| <input type="radio"/> Clipperton | <input type="radio"/> Jamaica | <input type="radio"/> Peru | <input type="radio"/> United States |
| <input type="radio"/> Cocos (Keeling) Islands | <input type="radio"/> Japan | <input type="radio"/> Philippines | <input type="radio"/> United States Minor Outlying Islands |
| <input type="radio"/> Colombia | <input type="radio"/> Jersey | <input type="radio"/> Pitcairn Islands | <input type="radio"/> Uruguay |
| <input type="radio"/> Comoros | <input type="radio"/> Jordan | <input type="radio"/> Poland | <input type="radio"/> US Virgin Islands |
| <input type="radio"/> Congo | <input type="radio"/> Kazakhstan | <input type="radio"/> Portugal | <input type="radio"/> Uzbekistan |
| <input type="radio"/> Cook Islands | <input type="radio"/> Kenya | <input type="radio"/> Puerto Rico | <input type="radio"/> Vanuatu |
| <input type="radio"/> Costa Rica | <input type="radio"/> Kiribati | <input type="radio"/> Qatar | <input type="radio"/> Vatican City |
| <input type="radio"/> Côte d'Ivoire | <input type="radio"/> Kosovo | <input type="radio"/> Réunion | <input type="radio"/> Venezuela |
| <input type="radio"/> Croatia | <input type="radio"/> Kuwait | <input type="radio"/> Romania | <input type="radio"/> Vietnam |
| <input type="radio"/> Cuba | <input type="radio"/> Kyrgyzstan | <input type="radio"/> Russia | <input type="radio"/> Wallis and Futuna |
| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Rwanda | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Yemen |
| <input type="radio"/> Czechia | <input type="radio"/> Lebanon | <input type="radio"/> Saint Helena
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Tristan da Cunha | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

* In addition to this public consultation, the Commission will organise targeted follow-up activities on certain topics with public and private sector stakeholders. Would you agree to be contacted for additional information?

- Yes
 No

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.**

Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

Your experience with HDV weights and dimensions

1. How familiar are you with the Weights and Dimensions Directive?

- I have an in-depth knowledge, including its detailed legal aspects
- I have a broad knowledge of the main aspects of the Directive
- I have a basic knowledge of the main aspects of the Directive
- I have a general knowledge from a user's point of view
- I have no previous knowledge

2. How often do you work in the area of HDV commercial road transport?

- Regularly
- Sometimes
- Rarely
- Never

General assessment of the current Weights and Dimensions Directive

This first part of this questionnaire will help the Commission evaluate the current Directive. Questions are grouped around the five evaluation criteria: effectiveness, efficiency, relevance, coherence, and EU added value.

Effectiveness: how the Directive contributes to achieving its objectives

The Directive sets out maximum limits on weights and dimensions for trucks, trailers, semi-trailers, buses and coaches used in national and international traffic in the EU. It has the following objectives:

- ensuring the free movement of goods
- ensuring equal competition in the single road transport market
- protecting road infrastructure
- ensuring road safety
- improving working conditions of HDV drivers by improving comfort and safety of truck cabs
- improving energy efficiency and reducing greenhouse gas (GHG) emissions from road transport by promoting less polluting HDVs and improving aerodynamics and intermodal transport.

3. In your view, how effective are the standards set out under the Directive in achieving the following objectives?

	Very effective	Effective	Neither effective nor ineffective	Ineffective	Very ineffective	No opinion
Ensuring the free movement of goods	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring equal competition in the single road transport market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting road infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring road safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving working conditions of HDV drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving energy efficiency and reducing GHG emissions from road transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please briefly explain your answer

Transportation and free movement of goods on the internal market is one of the core ideas of the European Union. Therefore, EU COM should have an overall approach to ensure easier access and smoother border crossings for transports of all modes. As the EU Green Deal also points out the urgency to reach climate ambitions and lower emissions from transport, it is essential that efficiency and innovation is implemented in all modes of transportation as part of the Sustainable and Smart Mobility Strategy and its action plan. Several member states have already implemented longer and heavier vehicles within national transportation as it is a way of reaching lower emissions and higher efficiency in transport. This is a very important work that has been carried out in member states and the EU COM should encourage more of these schemes. The most central point forward, for the EU COM, should be how to encourage more innovation in road transport. Focus of the revision of the directive should be not to hinder progress that has already been achieved in MS but how to build on that innovation for the benefit of all EU. Directive 96/53/EC should not set the maximum weights and dimensions but instead the minimum weights and dimensions within EU, or in other words the lowest level maximum dimensions and allow other higher /larger dimensions without restrictions. It would be a cost-efficient and sustainable solution that also would benefit the industry and trade sectors in the whole EU.

Efficiency: costs and benefits of the Directive

4. The Directive’s main objectives are to implement the single market for road transport, improve road safety, protect road infrastructure, improve drivers’ working conditions, and promote more energy efficient road transport.

In your view, to what extent has the Directive generated benefits in these areas?

	It has generated substantial benefits	It has generated moderate benefits	It has not generated any benefits	No opinion
Ensuring the free movement of goods	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring equal conditions of competition in the internal (intra-EU) road transport market	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Protecting road infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensuring road safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving working conditions for HDV drivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improving energy efficiency and reducing GHG emissions in road transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please briefly explain your answer

The current directive inhibits efficient use of existing infrastructure and increased transport efficiency by limiting the weight and dimensions of lorries in cross-border transport. Directive 96/53/EC should not set the maximum weights and dimensions but instead the minimum weights and dimensions within EU, or in other words the lowest level maximum dimensions and allow other higher/larger dimensions without restrictions. It would be a cost-efficient and sustainable solution that also would benefit the industry and trade sectors in the whole EU.

5. What do you think about the costs caused by the application of the Directive? (Costs may include but are not limited to: installation/maintenance and, when applicable, certification of weight in motion systems; administrative costs of national permits for transporting indivisible loads; costs of installation/maintenance of aerodynamic devices).

- I have not witnessed significant costs
- Costs are reasonable and proportional to the benefits
- Costs slightly outweigh the benefits
- Costs significantly outweigh the benefits
- I don't know

6. Do you think it is possible to reduce costs caused by the Directive?

- Yes
- No
- I don't know

* If Yes, please explain and identify the type of costs and their significance:

By making the directive more flexible and enabling transport solutions that are efficient, the benefits can increase in relation to costs.

Relevance: do the objectives still reflect current and future needs?

This section also asks you to identify new needs that have arisen since the Directive was adopted and objectives to respond to those needs.

7. In your view, are the Directive's objectives still relevant in addressing current and emerging needs and challenges?

	Very relevant	Somewhat relevant	Neutral	No longer relevant	No opinion
Ensuring the free movement of goods	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Ensuring equal conditions of competition in the internal (intra-EU) road transport market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting the road infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring road safety	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving working conditions for HDV drivers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving energy efficiency and reducing GHG emissions in road transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. In your view, what new needs or challenges are not addressed by the current Directive?

Using HDV's in the EU is a low hanging fruit for reduction of GHG. To reach the fit-for-55 objectives it can at least contribute. This is not depending on new technology. The mitigation of the lack of drivers can also positively contribute to reduce stress for drivers.

Coherence: how consistent are the Directive's rules with each other and with other European/international laws in the same area?

9. In your view, are there any contradictions or inconsistencies between the different rules of the Directive?

- Yes, there are many contradictions between the different rules
- Yes, there are some contradictions between the different rules
- No, there are not any contradictions between the different rules
- I do not know

Please explain your answer

Freight, cargo, and goods are transported in complex logistics chains and uses several modes of transport on their way from producer to final customer. For a well-functioning logistics chain, all modes of transport must be efficient and innovative. Halting innovation in one mode of transport for the better of another mode is a destructive and non-innovative way forward. A fair level playing field is when all modes are developing on their own terms. And competition between modes spurs innovation that leads to efficiency. As we have seen in examples in Sweden, rail benefits from high-capacity lorries as the radius of goods for transport to a rail hub is increased.

Not allowing HDV in all MSs goes against the goals of reducing greenhouse gas emissions. Competitiveness and sustainability of transport should be equally considered.

10. In your view, is the Directive consistent with other EU policies and objectives (e.g. [European Green Deal](#), [sustainable and smart mobility strategy](#), the [EU road safety policy framework 2021-2030](#), [legislation on the type approval of road vehicles](#)

, [Combined Transport Directive](#)) and other international initiatives(e.g. [Sustainable Development Goals](#))?

- It is fully consistent with other EU policies and international initiatives
- It is partially consistent with other EU policies and international initiatives
- It is not consistent with other EU policies and international initiatives
- It contradicts other EU policies and international initiatives
- I don't know

Please explain your answer

Transportation and free movement of goods on the internal market is one of the core ideas of the European Union. Therefore, EU COM should have an overall approach to ensure easier access and smoother border crossings for transports of all modes. As the EU Green Deal also points out the urgency to reach climate ambitions and lower emissions from transport, it is essential that efficiency and innovation is implemented in all modes of transportation as part of the Sustainable and Smart Mobility Strategy and its action plan.

EU added-value: the need for EU action to stimulate or complement action by Member States

11. To what extent do you agree with the following statements

	Fully agree	Slightly agree	Neither agree nor disagree	Slightly disagree	Fully disagree	Do not know
EU action is essential to achieve significant results in the context of weights and dimensions of HDV for commercial road transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU action is essential for effective cross-border cooperation and to ensure the smooth functioning of the internal market	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU action is essential for keeping roads safe for all road users	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU action is essential to improve the environmental performance of road transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU action is essential to reduce GHG emissions in the entire transport sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Impact assessment and known problems to address

This section focuses on identifying potential improvements to the Directive.

After the evaluation, which assesses how the Directive has been working until now, an impact assessment may be carried out to analyse options to tackle known problems.

Transport is a key strand of the single market, allowing for the free movement of goods and passengers across borders. For oversized and overweight vehicles, the current patchwork of national and bilateral /multilateral rules on maximum weights and dimensions risks undermining the smooth functioning of internal transport, leading to fragmentation of the market.

Road transport is responsible for around 72% of total transport GHG emissions, with 26% coming from HDVs (6% of total EU CO2 emissions).

The current patchwork of rules seems to cause ineffective and inconsistent enforcement of cross-border transport rules for HDVs. This seems to be the result of a lack of legal certainty (i.e. what is and what is not allowed) and discriminatory monitoring.

12. In your view, how significant are these known problems?

	Significant	Minor	Not a problem	No opinion
Fragmentation of the market for heavier and bigger (freight) transport vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road transport produces a high share of GHG emissions in the transport sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ineffective and inconsistent enforcement of cross-border rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Not enough support for intermodal transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

13. In your view, are there any additional problems that should be addressed by the Weights and Dimensions directive?

- Yes
- No
- I do not know

* If yes, please explain your answer:

One way to both harmonize and innovate at the same time is to have the European Modular System (EMS) as a basis of 96/53/EC. The EMS system consist of different vehicle modules that can be combined into different combinations but form standardized modules. The EMS introduces a flexibility that allows all transportation companies to operate in any country or to rearrange a vehicle into another combination when entering a country. With the EMS there is a possibility to be both flexible and innovative, and at the same time have interoperability between countries that does not allow the same dimensions.

The European Modular System opens for a type of harmonization within the union with standardized modules. That means that other sectors, as rail and maritime, know what type of modules they can expect to transport, and terminals know what type of modules they can expect to handle when loading or unloading. Including EMS in the directive means that EU COM can set standards to make sure that they are compatible with other modes of transport, and therefore also rail-road-maritime interoperability. With the EMS in the directive, it can also ensure that it possible to cross borders without administrative burdens or authorization procedures, regardless of the nationality of the vehicle.

14. The Commission has identified a series of measures that could address the known problems above. In your view, how useful would the following measures be in tackling them?

	Very useful	Quite useful	Neutral	Quite detrimental	Very detrimental	No opinion
A. Increase the maximum weights and dimensions to the limits most commonly allowed in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
A1. Only automatically authorise cross-border transport of heavier/longer vehicles between the neighbouring Member States that allow their circulation in national traffic (i.e. not an EU-wide rule)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
B. Simplify and/or harmonise administrative procedures (e.g. for issuing national authorisations for the transport of indivisible loads)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
C. Adapt technical standards to the needs of zero-emission vehicles (e.g. additional length, weigh and/or axle weight to accommodate zero-emission technologies)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
C1. Create more incentives to increase the use of alternatively-fuelled and zero-emission HDVs (e.g. by permitting increased loading capacity)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
D. Create incentives to drive the use of aerodynamic and other energy- saving technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D1. Make the use of aerodynamic and other energy- saving technologies mandatory	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D. Create incentives to drive the use of aerodynamic and other energy- saving technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
D1. Make the use of aerodynamic and other energy- saving technologies mandatory	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
E. Adapt technical standards to the needs of intermodal transport to ensure a level playing field with only-road transport (e.g. permitting extra height to facilitate transporting high-cube containers or ensuring the compatibility of road transport vehicles as loading units)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

E1. Create more incentives to encourage intermodal transport (e.g. permitting increased loading capacity to vehicles involved in intermodal transport)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
F. Allow the circulation of European Modular Systems (combinations of standard vehicles of up to 25.25 metres long with/without additional weight) in cross-border transport in the EU to make transport more efficient	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
G. Set out safety requirements for cross-border transport of oversized and overweighed vehicles	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
H. Use digital technologies to facilitate compliance with rules and automated checks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I. Revise the European Best Practice Guidelines for Abnormal Road Transports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answer for measure A(1)

Several member states have already implemented longer and heavier vehicles within national transportation as it is a way of reaching lower emissions and higher efficiency in transport. This is a very important work that has been carried out in member states and the EU COM should encourage more of these schemes. The most central point forward, for the EU COM, should be how to encourage more innovation in road transport. Focus of the revision of the directive should be not to hinder progress that has already been achieved in MS but how to build on that innovation for the benefit of all EU.

There should be no limitations on weights and dimensions if the countries of both sides of the borders allow the weight and dimensions. There should neither be restrictions on number of border crossings if countries passed allow the weights and dimensions.

Directive 96/53/EC should not set the maximum weights and dimensions but instead the minimum weights and dimensions within EU, or in other words the lowest level maximum dimensions and allow other higher /larger dimensions without restrictions. EU COM states that 44 tonnes vehicles are one of the limits it is looking into. 44 tonnes can only be introduced in EU as a maximum standard that is set as a minimum, in other words the lowest maximum standard or a minimum maximum standard. That means that 44 tonnes must not limit member states to increase the weight allowance beyond 44 tonnes.

The same applies to the maximum length. EMS are different standardized modules that can be 25.25 meters, but the same standardized modules can also be in a combination that is even longer. Therefore, the EU should not limit EMS to only be allowed for a maximum of 25.25 meters. Finland, for example, has already introduced EMS with a maximum length of 34.5 meters.

Please explain your answer for measure B

Please explain your answer for measure C(1)

Use of larger high-capacity vehicles should not be tied to alternative fuels or zero emissions as it could lead to a negative effect. Incentive or other directives is more suitable to regulate that.

The additional weight on the vehicle because of alternative fuels can be considered, but the basis should be the European Modular System. Additional weight might also imply a need for more wheel axels, as the wear and tear of a road is determined by the payload on each wheel. If the payload per wheel is not higher than before the weight can be higher. But the directive should not aim to limit weights and dimension, but to set a minimum standard that can be higher in a member state or between member states as long as the EMS is used.

However, the use of larger high-capacity vehicles, should not be restricted exclusively to alternative fuels or zero emissions. Nor should larger EMS combinations only be allowed as part of intermodal transport chains. If the right to high-capacity vehicles were limited to zero emissions vehicles, there would be several of the sectors now using 74 tonnes (in Sweden) and 76 tonnes (in Finland) that would be hindered. In worst case it could lead to a shift to smaller combinations of vehicles, i.e., less efficiency and higher demand on fuels. Using biofuels, is of no problem for heavier vehicles and there are several of these vehicles already existing. Although larger usage of biofuels or other alternatives fuels should be regulated in other directives (that are already proposed in the Fit-for-55 package) or through national incentives.

Please explain your answer for measure D(1)

Aerodynamic technologies should not be mandatory, because they may not work in winter conditions when ice and snow are accumulated to vehicles.

Please explain your answer for measure E(1)

One way to move forward and to both harmonize and innovate at the same time is to have the European Modular System (EMS) as a basis of 96/53/EC. The EMS system consist of different vehicle modules that can be combined into different combinations but form standardized modules. The EMS introduces a flexibility that allows all transportation companies to operate in any country or to rearrange a vehicle into another combination when entering a country. With the EMS there is a possibility to be both flexible and innovative, and at the same time have interoperability between countries that does not allow the same dimensions.

The European Modular System opens for a type of harmonization within the union with standardized modules. That means that other sectors, as rail and maritime, know what type of modules they can expect to transport, and terminals know what type of modules they can expect to handle when loading or unloading. Including EMS in the directive means that EU COM can set standards to make sure that they are compatible with other modes of transport, and therefore also rail-road-maritime interoperability. With the EMS in the directive, it can also ensure that it possible to cross borders without administrative burdens or authorization procedures, regardless of the nationality of the vehicle.

Please explain your answer for measure F

see E(1)

Please explain your answer for measure G

Please explain your answer for measure H

Digitization will allow more risk based controls and contribute to increase the efficiency of controls.

Please explain your answer for measure I

15. In your view, are there additional measures that could address the known problems?

- Yes
- No
- I don't know

16. Several Member States allow longer (and sometimes heavier) vehicle combinations in different configurations (e.g. an articulated truck with a trailer) to improve transport efficiency and reduce GHG emissions from road transport (as the same quantity of goods can be transported with fewer vehicles). These vehicle combinations, known as European Modular Systems (EMS), are not allowed in cross-border traffic as a general rule.

Do you think that the circulation of EMS in the EU should be allowed to increase transport efficiency and to reduce GHG emissions from road transport?

- Yes, they should be allowed in all Member States in national and in international traffic
- Yes, they should be allowed in all Member States in national and in international traffic, but only on certain parts of the network
- Yes, they should be allowed in all Member States in national and in international traffic, but with additional road safety measures in place (e.g. equipped with additional safety features, excluded from urban areas, etc.)

- Yes, they should be allowed in all Member States in national and in international traffic, but only if this is complemented with other greening measures (e.g. zero-emission powertrains, improved aerodynamics)
- Yes, they should be allowed in all Member States in national and in international traffic, but only for road legs of intermodal transport
- Yes, but only in international transport between neighbouring Member States that allow them in national traffic. Member States that do not allow EMS should not be obliged to accommodate them
- No, they should not be allowed in international traffic
- I do not know

Please explain your answer

See above 14 E(1)

17. Do you think that using longer and/or heavier vehicles under the European Modular System (EMS), which also makes road transport more efficient and therefore cheaper, will lead to any of the following effects?

	Strongly agree	Slightly agree	Slightly disagree	Strongly disagree	No opinion
The volume of road freight (in tonne-kilometres) will increase further	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Some freight transport will switch from rail, inland waterways or short sea shipping to road	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Road safety will be negatively affected due to the size of the vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your answer

As we have seen in examples in Sweden, rail benefits from high-capacity lorries as the radius of goods for transport to a rail hub is increased.

Freight, cargo, and goods are transported in complex logistics chains and uses several modes of transport on their way from producer to final customer. For a well-functioning logistics chain, all modes of transport must be efficient and innovative. Halting innovation in one mode of transport for the better of another mode is a destructive and non-innovative way forward. A fair level playing field is when all modes are developing on their own terms. And competition between modes spurs innovation that leads to efficiency.

By allowing HDV, the number of vehicles used to transport a given amount of goods is reduced. This in turn leads to fewer accidents with heavy vehicles.

Other aspects

18. Are there any other aspects of the Directive that the Commission should consider?

19. Should you wish to provide additional information (for example a position paper) or raise specific points not covered by the questionnaire, you can upload your additional document here. The maximum file size is 1 MB.

Please note that the document will be published with your reply to the questionnaire, which is the main input to this public consultation. The document is complementary and is background reading to understand your position better.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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