

The Association of European Vehicle Logistics

Harmonisation of allowable loaded truck lengths for vehicle transporters



Position Paper March 2012 (Amended January 2017)

About ECG

ECG, the Association of European Vehicle Logistics, has been the voice of the Finished Vehicle Logistics industry in Europe since it was first formed in 1997 as the European Car Transport Group of Interest. Also known as 'outbound' logistics in the automotive sector, the industry is truly multi-modal, utilising short-sea and deep-sea shipping, inland waterways, rail and road transport to move millions of vehicles around Europe every year.

Today ECG represents the interests of almost 100 member companies, ranging from family owned SMEs to multinationals, operating in almost every Member State as well as Norway, Russia, Switzerland, the Western Balkans and Turkey. The industry is not just about transport and distribution though, ECG's members also provide storage, preparation and post-production services to vehicle manufacturers, importers, car rental companies and vehicle leasing operators across the region. Figures from the latest biennial ECG survey of the industry¹ show that the members of the association own or operate more than 508 car carrying ships, 16,000 purpose-built rail wagons, 25 river barges and 22,134 road transporters.

As a major employer, the industry plays an important role in contributing to the economic success of the European Union. Today, ECG members have an aggregated turnover of \in 27.1 billion and the indirect effect on companies associated with the sector is estimated at \in 64.4 billion. More than 116,000 Europeans are employed directly by the finished vehicle logistics industry and an additional 294,239 are employed indirectly in this sector.

At issue

Passenger cars and light commercial vehicles cannot currently be loaded very efficiently on a transporter restricted to the standard 18.75m truck length and historically most European countries have introduced legislation over the years that allows more efficient loading. Vehicle transporters are highly specialised vehicles and most Member States permit them, by the use of extendable decks and a combination of front and/or rear overhangs, to build loads that are typically a couple of metres longer than the unloaded truck itself². This has been a normal way of operating across Europe for many years and most vehicle transporters in use today allow for this loading without any technical constraints. In loading a car transporter the total weight is not normally an issue since it remains comfortably below 40 tonnes for a typical load, although this may change as electric vehicles become more prevalent.

² Note that this issue has nothing whatsoever to do with the so-called European Modular System (EMS) which is a completely separate concept and is normally used to refer to vehicle combinations of 25.25m. It is expected to be of only marginal benefit to the finished vehicle logistics industry due principally to the requirement for urban deliveries.



The problems

The difficulty facing the industry today is twofold. Firstly, almost every Member State has its own rules governing this niche-area. In many cases this national legislation is specific to vehicle transporters. The result is a patchwork of legislation across the EU which creates a real barrier to the operation of a single market. The map shown opposite is in fact a very simplified picture of the situation today.

¹ ECG Survey of Vehicle Logistics in Europe 2016/2017. www.ecgassociation.eu/PublicationsReports/Surveys/ECGSurvey.aspx

In reality when looking at each country in detail almost every set of national rules are different with a variety of front and rear overhangs allowed, and many different total overall loaded lengths are permitted.³ For a company operating internationally in Europe, just staying informed of the different national rules and keeping drivers aware of them is a challenge in itself.

The second, and by far the most serious, issue is that international transport is still restricted to a maximum (loaded) length of 18.75m despite all the national variations. Unfortunately, current EU legislation makes no differentiation between loaded and unloaded lengths. In principle even when crossing the border between two countries which allow loading to an identical overall length of more than 18.75m a truck should be partially unloaded for the actual crossing! This is a lengthy and therefore expensive process and each time a load is handled it creates a risk of damage to these high value cargoes. Situations also exist today where trucks have to stop at national borders within the EU and unload one or two vehicles before continuing their journey into a country

> 18.75m (Malta only) 19.75 - 20.55m

20.75m

with a lower limit. When several trucks have done this an empty transporter will be despatched to collect these odd vehicles and take them on their way. In reverse it can mean that a transporter could be travelling hundreds of kilometres with a smaller, less efficient, load than normal simply because the first leg of the journey took place in a Member State with lower limits. Consequently, for vehicle transporters a 'single market' it is not.

21.00 - 22.75m

22.00 - 24.00m

³ ECG has compiled a document detailing all existing European legislation with full English translations and a table summarising the situation. www.ecgassociation.eu/Activities/Currentissues/Loadedlength/Nationallegislations. aspx

ECG's proposal

Harmonise the allowable <u>loaded</u> length for vehicle transporters to at least 20.75m

Why 20.75m? Many of the larger markets already apply this limit whilst the majority use a figure in the range 20.55 – 21.00m. This is not asking for anything new, it does not affect loaded weights or infrastructure and it requires no new investment, while the unloaded vehicle transporters remain at 18.75m in accordance with current EU legislation. Overnight it would simplify the vehicle logistics industry and deliver instant gains in efficiency which can only benefit the consumer whilst the environmental benefits of more efficient loads will benefit society at large.

Critically this loaded length must be allowed for international as well as for national transport operations to allow cross-border operations.

However, ECG does not suggest that Member States already allowing lengths in excess of 20.75m should be penalised, they should be able to retain their longer national limits if they wish or there would be a corresponding increase in trucks needed to deliver in those regions.

The benefits quantified

Harmonising allowable loaded lengths for vehicle transporters to at least 20.75m would allow trucks to load 1 or 2 more vehicles per load in many areas, thus giving improved efficiencies including:

- 13% increase in truck capacity and thus a reduction in truck loads of 100,000 per annum.
- A reduction in 600 trucks required by the industry.
- Consequent reduction in congestion and improvement in road safety.
- CO₂ reduction of up to 15.5 grammes per car per kilometre.
- CO₂ saving of 63,000 tonnes per annum.
- Reduced costs for the automotive industry and, for consumers, increased competitiveness.
- Simplified cross-border operations.

And the downside? There is none. These benefits can be delivered immediately with the equipment already in use by the industry, with no change in weight limits, no changes to infrastructure, no additional investment or negative externalities at all.

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