

Response to Call for Evidence

Commercial vehicles – weights and dimensions (evaluation)

[ECG – The Association of European Vehicle Logistics](#) is the voice of the Finished Vehicle Logistics (FVL) industry in Europe, a truly multimodal sector, representing over 140 member companies and partners operating rail, road, maritime and fluvial modes across Europe.

ECG appreciates the opportunity to provide feedback to the Commercial vehicles – weights and dimensions (evaluation) initiative aiming at reaching the full potential of the single market and significantly reducing greenhouse emissions from transport.

In July 2020, ECG issued the “[ECG Paper on loaded length of vehicle transporters](#)” laying out the benefits of loaded length harmonisation to at least 20.75m at EU level. These benefits include carbon emissions savings, legal certainty for operators engaged in international transport and increased efficiency in the sector. ECG welcomes the confirmation of this analysis by the European Commission in the present Call for Evidence.

By harmonising loaded length to at least 20.75m at EU level, the following is noted:

- the FVL sector can already significantly contribute to the saving of carbon emissions by increasing operators load factors with the same rolling stock that is already in use. Despite the drop in volumes in the automotive sector caused mainly by material shortages (especially microchips) in 2021, high demand is forecasted to bring volumes back to historic levels in the near future. Therefore, potential carbon savings can be enabled for the coming years;
- operators would finally operate in a single EU market now characterised by a patchwork of different national legislations in this area. By harmonising around the most common limits already allowed across the EU, legal certainty can be created for operators who engage in cross-border activities;
- the Commission should implement the automatic authorisation cross-border transport of longer and heavier vehicles between neighbouring Member States that allow them. For example, currently a vehicle carrier crossing from Romania to Hungary, where permitted loaded length is 21.75m and 22.00m respectively, can be loaded to the minimum allowed in the two countries based on a bilateral agreement among the two countries. Automatic authorisation at EU level would decrease the administrative burden on Member States having bilateral agreements and companies who engage in these operations.

Additionally, ECG supports the increase of maximum weight to 44 tonnes at EU level:

- 13 Member States already allow for a weight of more than 40 tonnes. In the automotive industry specifically, the passenger cars and light commercial vehicles are increasingly heavier due to the shift to electrification. On average, electric cars weigh 1,800 kg, around 500 kg more than the average petrol/diesel car of 1,300 kg;
- As Alternative Fuel trucks are brought to market most are likely to be considerably heavier than existing ICE equivalents thereby reducing available load capacity;
- The loaded weight of vehicle carriers are, therefore, getting significantly heavier causing a decrease in load factor in international transport where the maximum allowed weight is 40 tonnes making the industry less efficient than it could be and hindering carbon emissions savings. The result is more car transporters on the roads and an increase in the number of drivers required.