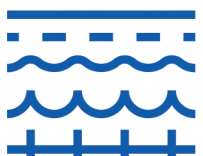


In support of Greening Freight

through harmonisation of loaded length for
vehicle transporters in the Weights & Dimensions Directive

September 2023



ECG

The Association
of European
Vehicle Logistics

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1. Harmonisation of loaded length for vehicle transporters

ECG¹ has been calling for harmonisation of loaded length of vehicle transporters at EU level for many years. We are extremely happy that the European Commission introduced article 8c in their proposal for revision of the Weights and Dimensions Directive in July 2023².

The finished vehicle logistics (FVL) sector, which ECG represents, maximises the utilisation of multi-modality where possible, as demonstrated by the extensive use of short-sea and rail in the sector as well as inland waterways. However, transportation of cars by truck remains an essential mode and the most efficient in many cases, both for national and cross border movements - and always for the 'last mile'.

ECG is pleased that the European commission is harvesting a low hanging fruit by proposing a standard minimum loaded length for vehicle transporters in Europe of **at least 20.75m to harmonise many of the existing national laws across Europe**. These are summarised in our National legislation for vehicle transporters booklet³.

13 Member States allow for loaded length of at least 20.75m in the EU (see Figure 1). Hundreds of trucks are therefore crossing borders within the EU loaded to more than 18.75m every day. The lack of harmonisation at EU level is nonetheless posing today, more than ever, an enormous threat for our members to operate in a single market.

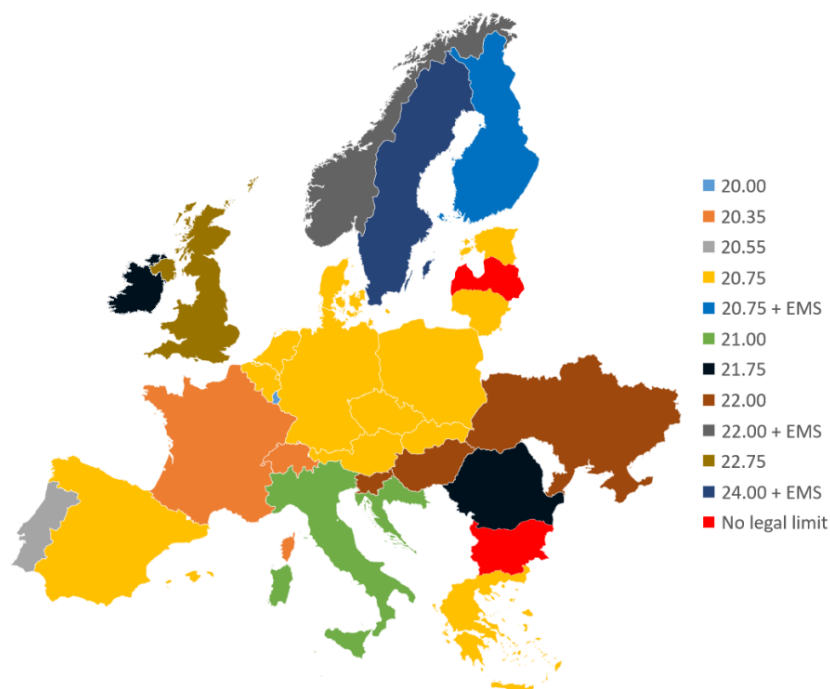


Figure 1 Loaded length of vehicle transporters in metres in EU Member States

¹ ECG - the Association of European Vehicle Logistics represents logistics service providers across all modes of transport moving millions of new vehicles around Europe every year. For more information visit <https://www.ecgassociation.eu/>.

² https://transport.ec.europa.eu/system/files/2023-07/COM_2023_443_0.pdf

³ <https://www.ecgassociation.eu/publications-and-reports/national-legislation-car-transporters/>

2. Main risk when crossing borders

ECG has recently become aware of Member States starting to apply the EU limit of 18.75m on their territories to trucks engaged in international trips and, consequently, issuing significant penalties. Technically this is correct application of EU law which applies when crossing a border and where vehicle transporters are not legally recognised despite almost every Member State having national rules for vehicle transporters.

If this approach were to be applied more widely across the EU, then load factor would decrease by 2 cars. The effect of this on our sector would be disastrous. In this scenario, we estimate that 1/3 of the current trucks (those engaged in international transport) moving vehicles in the EU would be affected and we would need thousands more trucks to carry the same number of cars with consequent increasing costs and emissions⁴.

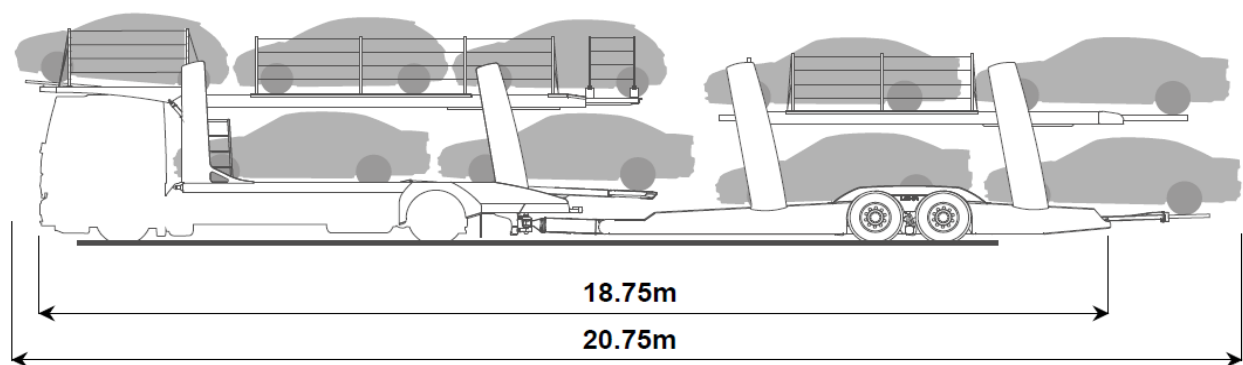


Figure 2 Illustration of load factor for vehicle transporters of loaded length of 18.75m vs 20.75m.

The benefits of such a harmonisation will not only remove the risks above but it will result in **less trucks on the road, less emissions** and will contribute to addressing the critical problem of **driver shortage**. This position is fully shared by the International Road Transport Union (IRU).

⁴ See ECG paper on environmental benefits of harmonization of loaded length of vehicle transporters: <https://www.ecgassociation.eu/wp-content/uploads/2023/05/ECG-Paper-on-loaded-length-of-vehicle-transporters-v4-20.07.23-small.pdf>.

3. ECG's comments relating to Article 8c proposed in the Greening Freight package

ECG welcomes the introduction of article 8c by the European Commission. However, following discussions and exchanges with ECG members, as well as the main manufacturers of vehicle transporters used in the European Union, we identified 3 key concerns regarding the Commission's proposal related to vehicle transporters as follows:

3.1 Use of the word 'open'

Firstly, it has been pointed out that use of the word 'open' in article 8c could cause confusion as there is no recognised definition of 'open' and 'closed' vehicle transporters. For example, is a transporter that is mostly 'closed' but without any rear doors defined as open or closed? The manufacturers of vehicle transporters expect that partially closed designs, that offer slightly improved aerodynamics and better energy efficiency, could become more common in future. Since ECG believes it would be difficult to create appropriate definitions, and because we would not wish to see operators of closed or partially closed transporters discriminated against, we believe it would be best to simply delete the word 'open' from the proposal.

3.2 Point 1.1 of Annex I

Secondly, the wording of the Commission's original proposal is correct in that it would allow overhangs not just for road trains but also for articulated trucks and shorter vehicles, as defined in point 1.1 of Annex I, as all are currently used as vehicle transporters and operated with rear overhangs (*see Figure 3*). However, articulated transporters cannot be loaded with a front overhang due to swept turning circle issues but this is not clear in the initial proposal. Of course, articulated transporters are not designed in a way that would allow loading with a front overhang, but ECG believes that this should be clarified in the text unless the Commission is satisfied that this is regulated elsewhere in the legislation.

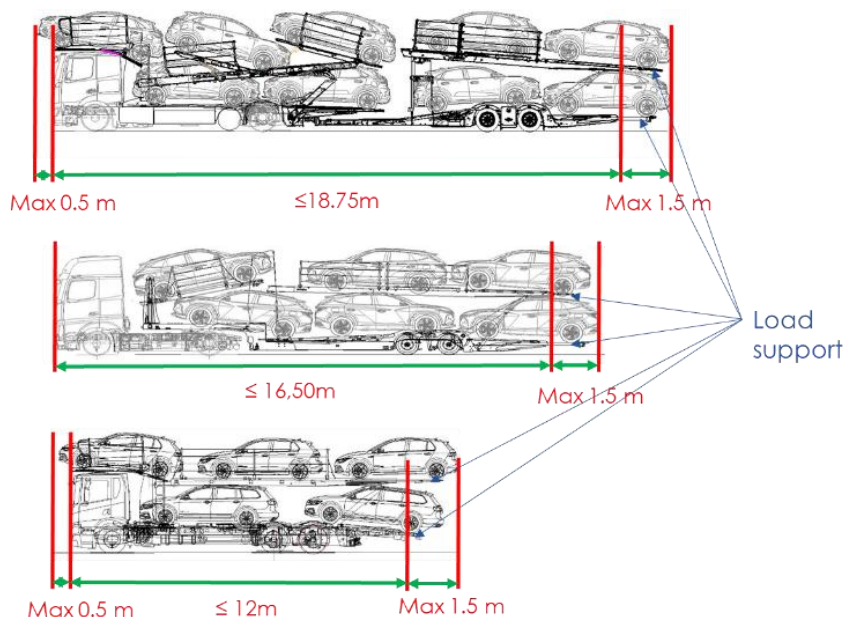


Figure 3 Vehicle transporters configurations

3.3 Use of the word 'authorised' in relation to load supports

Thirdly, ECG is concerned that there is no definition of 'authorised' as load supports are not currently included in the homologation process. We have clarified that the manufacturers agree it is logical to include them in future, but in order to avoid the risk of penalising the current fleet it is necessary to remove this word from the proposal.

3.4 Overhangs

Fourthly, the wording used by the Commission regarding the loading of overhanging vehicles should be clarified. For the front overhanging vehicle, as there are no load supports, both axles should rest on the truck structure. For rear overhangs, at least the forward axle of the overhanging vehicle/s must rest on the truck structure.

4. Summary

In conclusion, we now believe that a form of words very close to the proposal for Article 8c in the Greening Freight package would be the best solution and have written a final proposal below.

a. ECG's final proposal for Article 8c

Vehicle transporters may exceed the maximum lengths laid down in point 1.1 of Annex 1 while loaded, up to a total of 20.75 meters, using extendable rear load supports.

The load may protrude in front of the vehicle transporter, excepting articulated vehicles, up to a maximum of 0.5 meters provided that the axles of the transported vehicle rest on the body structure. At the rear the load may protrude to a maximum of 1.5 meters provided that the forward axle(s) of the transported vehicle(s) rest on the trailer structure. The extendable rear load supports may not protrude further than the overhanging load.

b. ECG's final proposal for recital 14

We additionally suggest the following amended version of the recital 14 of the proposal referring to our sector. The changes simply harmonise the phrase 'vehicle transporters' and remove the word 'open' from the original proposal.

Vehicle transporters, most of which have open bodies, have very limited potential to reduce their energy consumption via improved aerodynamics. Many different national rules on the use of overhanging loads on vehicle transporters cause distortions of competition and limit significantly their potential to improve operational efficiency and energy performance in international traffic. Therefore, it is necessary to harmonise rules on the use of overhanging loads of vehicle transporters, so as to ensure that these objectives are properly met.

5. Conclusion

ECG's proposal is completely in line with the Commission's intentions. It would provide the intended harmonisation of rules for vehicle transporters in Europe and recognise long-established custom and practice in the sector. This would provide legal certainty for international movements in addition to improved efficiency and environmental benefits.

Attachment 1 – Vehicle transporters

1. Typical 18.75m vehicle transporters in Europe - 90% of the vehicle transporters in the European market have such configuration.



2. Typical 'closed' vehicle transporters – a niche sector of the market in Europe.



3. Examples of partially closed vehicle transporters (non-European).

