

POSITION PAPER

Weights & Dimensions

For a technology-open framework that encourages innovation in the freight transport sector





Background

In this paper, CLEPA, the European association of automotive suppliers, evaluates the European Commission's proposal to amend the Council Directive 96/53/EC, laying down for certain road vehicles circulating within the European Union the maximum authorised dimensions in national and international traffic and the maximum authorised weights in international traffic. Our position aims to provide an assessment of the proposed amendments, their impact for industry, and recommendations to facilitate the advancement of sustainable mobility in Europe.

Executive Summary

Despite representing only 2% of the vehicles on the road in the EU, trucks move close to 80% of goods, playing a vital role in facilitating commerce and mobility across the EU. The Weights and Dimensions proposal stands amongst a group of legislative proposals that will play a key role in the transition towards more sustainable and safe transport, as it aims to strengthen the environmental ambition of previous iterations of the regulation by speeding up the decarbonisation efforts through the uptake of zero-emission heavy-duty vehicles (HDVs).

To that end, the appropriate incentives must be provided to the sector in order to encourage further investment in zero-emission technologies. Extra weights and dimensions allowances would compensate for the weight and size of those technologies and ensure the same loading capacity as conventional HDVs, thus being key mechanisms to facilitate the decarbonisation transition and the inclusion of those technologies, not only when it comes to the use of heavier batteries, but also to allow for the junction of trucks with trailers and eTrailers, for instance.

Aligned with the targeted expansion of recharging and refuelling infrastructure and the implementation of more stringent CO₂ standards for HDVs, amongst other initiatives, the freight transport sector can effectively and progressively realise the benefits of adopting zero-emission technologies while maintaining its key role in European and international transport, provided that enhancements are made to the proposed amendments in the Weights and Dimensions Directive, as presented in the following section.



Recommendations

- 1. Increase of the axle load** in light of the expected increase of the maximum authorised weight for a vehicle in combination with zero-emission vehicle by 4 tonnes. That additional weight requires a revision and subsequent increase of the maximum axle load through the whole truck-trailer (or semi-trailer) combination, without penalising the load capacity of the trailer.

Thus, the following amendment is proposed regarding Annex 1:

| Annex 1, Article 2 – Maximum Authorised Vehicle Weight (in tonnes) | | | | | |
|--|--------------------|-----------|--------------------|--------------------|-----------|
| Regulation | | | Proposed Amendment | | |
| 2.1.1 | Two-axle trailer | 18 tonnes | 2.1.1 | Two-axle trailer | 20 tonnes |
| 2.1.2 | Three-axle trailer | 24 tonnes | 2.1.2 | Three-axle trailer | 27 tonnes |

- 2. Additional weight allowances for zero-emission vehicles of 4 tonnes**, particularly to what pertains to sub-sections 2.2.1 and 2.2.2, in such a way that the additional weight can be shared between the HDV and the trailer or eTrailer.

This allowance would accommodate the installation of zero-emission Trailers and eTrailers, as well as refrigeration units, for instance, whilst assuring that there is a fair split of the extra weight between the vehicle and the trailer, with a limit of maximum 2 tonnes for the truck and 2 tonnes for the Trailer or eTrailer.

The following amendment text would successfully tackle this concern and allow for the aforementioned to be made reality:

"In the case of vehicle combinations including motor vehicles with zero-emission technology and eTrailer technology, the maximum authorised weight shall be increased by 4 tons and may be distributed freely between truck and trailer."

- 3. A new exception for additional weight allowances**, which would focus on allowing for the possibility to deploy zero-emission technologies such as eTrailers and zero-emission refrigeration units on internal combustion engine (ICE) vehicles as a medium-term measure until all HDVs become ZEVs. This would allow for the elimination of around 6 million tonnes of CO₂ emitted annually by all refrigeration units circulating on EU roads.

Proposal for new exception:

"In the case of vehicle combinations including vehicles other than alternatively fueled vehicles or zero-emission vehicles, the maximum authorised weights provided for in Sub-section 2.2.1, 2.2.2, 2.2.3 and 2.2.4 shall be increased by 2 tons for a trailer including e-trailer technology."



4. **An extension of deadline for allowances to 2039**, considering the expected increase in the uptake of zero-emission vehicles, the deadline for these weight allowances should be extended to 2039, if the enabling conditions on the market allow for it.

This extension would further heighten the potential and desired increase of the use of zero-emission technologies and ZEVs in particular, which would benefit the decarbonization transition of the automotive industry.

The following text amendment proposal exemplifies this recommendation:

"In view of the expected increase in the uptake of zero-emission vehicles, this Article shall apply until 31 December 2039, if enabling conditions are met".

5. Following the reasoning previously mentioned, **clear definitions of Trailers, eTrailers and eTrailer technology**, need to be provided to ensure the appropriate inclusion of those unpowered vehicles in the regulation.

CLEPA thus recommends the use of the following definition of Trailer rather than the one proposed by the Commission:

*"**Trailer**" shall mean any non-self propelled vehicle, which is designed and constructed to be towed by a power driven vehicle and includes semi-trailers. However, the trailer may be propelled to support the motion without applying propelling forces when not coupled to a towing vehicle.*

*"**eTrailer**" shall mean any kind of trailer that is able to contribute to the propulsion of the vehicle combination by using its own electric powertrain, which requires a modification of EU regulation 2018/858.*

*"**eTrailer technology**" means technology designed to support auxiliary trailer equipment, e.g., a transport refrigeration unit, that may include an e-axle with regenerative braking and a battery pack system for storage of electricity generated by the e-axle or received from an auxiliary source.*

These definitions would more appropriately ensure that transport operators interested in investing in zero-emission or more energy-efficient motor vehicles, trailers and semi-trailers can do so without legal obstacles. In order to remove the barriers to the market uptake of these technologies, EU type approval legislation must be updated accordingly to include them.

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About CLEPA

CLEPA, the European Association of Automotive Suppliers, represents over 3,000 companies supplying state-of-the-art components and innovative technologies for safe, smart, and sustainable mobility.

CLEPA brings together over 120 global suppliers of car parts, systems, and modules and more than 20 national trade associations and European sector associations. CLEPA is the voice of the EU automotive supplier industry linking the sector to policy makers.



The automotive sector accounts for **30% of R&D** in the EU, making it the number one investor.



European automotive suppliers invest over **30 billion euros** yearly in research and development.



Automotive suppliers register over **39,000 new patents** each year.



Automotive suppliers in Europe generate **1.7 million** direct jobs.

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