

Revision of Directive 96/53/EC Commercial Vehicles – Weights and Dimensions

April 2024



#wirsindbereit

The German Association of the Automotive Industry welcomes the European Commission's proposal to revise Directive 96/53/EC on the maximum dimensions and weights of heavy commercial vehicles.

Particularly noteworthy are the proposed increases in weights and dimensions related to alternative drives and zero-emission vehicles, as well as the mutual recognition of EMS combinations and their weights in cross-border traffic, which are sensible measures to save emissions and create effective incentives for the use of emission-free technologies.

Referring to the Commission's proposal, we would like to address the following points that, in our view, are either not considered or insufficiently addressed:

Additional Weights and Dimensions

The proposed additional weights are essential due to the electrification of commercial vehicle combinations, ensuring that the weight of components like batteries does not lead to a reduction in payload.

Clarification is needed on how weight distribution for a vehicle combination is understood and whether differentiation between the truck and trailer is necessary. For the proposed additional weights for zero-emission vehicles, axle loads for trailers should be increased to utilize the suggested additional weight of 4 tons.

Due to the additional weights of the future technologies employed in trailers, a similar adjustment of axle loads as in the trucks is necessary. This is to prevent a reduction in payload and to maintain flexibility in the load center of gravity. An adaptation of axle loads from 24t to 27t (three-axle trailer) or from 18t to 20t (two-axle trailer) by 1t per trailer axle should be provided.

Regarding intermodal transport processes and the use of new handling techniques, standard semi-trailers under certain technical conditions can now be loaded onto trains. To achieve a total combination weight of 44t in intermodal transport and thus increase the attractiveness of intermodal transport, it should be possible to register articulated vehicles technically designed for this purpose, with a three-axle standard semi-trailer including the body strength required for intermodality and a three-axle aggregate load of 27t (also with axle distance $1.3\text{m} < d \leq 1.4\text{m}$).

In our previous positions, we have also repeatedly pointed out the need to adjust the permissible dimensions of vehicles. Unfortunately, our indications that, for example, height exemptions for supplementary aerodynamic components, as well as safety-relevant attachments such as camera monitor systems, as well as positioning and radar systems, the use of solar panels (for the direct or indirect energy supply of electrical or electronic vehicle systems) are necessary, were not considered in the Commission proposal. Exemptions from the width to improve aerodynamics and for highly insulated bodies to minimize the use of the cooling unit and consequently fuel consumption (CO₂) are also not included in the proposed regulation.

Basically, adjusting the height of vehicles or vehicle combinations to accommodate containers with a standard external height of 9'6"ft (High-Cube containers) in global freight transport, as well as European standard swap bodies of classes A (according to EN 452) and C (according to EN 284) with an external height of up to 3200 mm, is highly welcome to further facilitate intermodal transport. Furthermore, consideration should be given to the shift towards alternative vehicle propulsion systems, which may require more height on the vehicle infrastructure than conventional combustion engines. The same applies to the use of low rolling resistance tires for the purpose of CO₂ reduction, where the diameter is causally related to rolling resistance. In our view, there is a lack of further detailed information on how to deal with the approval and use of these vehicle combinations.

In principle, exceeding the maximum length for zero-emission vehicles or vehicle combinations to accommodate emission-free technology is also welcomed. However, this should not be limited to a maximum of 90 cm; rather, it should be clarified that the exceeding of the designated maximum lengths may be as large as necessary to provide space for accommodating emission-free technologies such as batteries and hydrogen tanks, as long as safety, efficiency, and comfort features are not compromised.

European Modular System (EMS)

Regarding the use of EMS, the conditions for deploying these vehicle combinations need a more detailed description. The process for mutual recognition of nationally approved vehicles in cross-border traffic must be precisely defined.

It is desirable to include specific definitions of approved dimensions and possible combinations of EMS vehicles in the regulatory proposal. In this context, we advocate increasing the maximum length of the EMS to 32 meters. Several EU member states already have such combinations based on European standard dimensions.

We recommend implementing a European-wide information and communication system rather than relying on national solutions. Essential information, such as how national regulations can be made accessible to all affected industries promptly and how the information's timeliness is ensured, is still lacking for practical implementation.

Contact

Andreas Rade

Managing Director
andreas.rade@vda.de

Götz Schneider

Manager
goetz.schneider@vda.de

Dr. Sascha Pfeifer

Head of Department
sascha.pfeifer@vda.de

The German Association of the Automotive Industry (VDA) brings together more than 650 manufacturers and suppliers under one roof. The members develop and produce cars and trucks, software, trailers, bodies, buses, parts and accessories as well as new mobility offers. We represent the interests of the automotive industry and stand for modern, future-oriented multimodal mobility on the way to climate neutrality. The VDA represents the interests of its members vis-à-vis politicians, the media and social groups. We work on electromobility, climate-neutral drives, the implementation of climate targets, securing raw materials, digitalization and networking as well as German engineering. In doing so, we are committed to a competitive business and innovation location. Our industry secures prosperity in Germany: More than 780,000 people are directly employed in the German automotive industry. The VDA is the organizer of IAA MOBILITY, the largest international mobility platform, and the IAA TRANSPORTATION, the world's most important platform for the future of the commercial vehicle industry.

Editor German Association of the Automotive Industry (VDA)
Behrenstraße 35, 10117 Berlin
www.vda.de

Copyright German Association of the Automotive Industry (VDA)

Reproduction and any other form of reproduction is only permitted if the source is indicated.

Version Version 1.0, January 2024