

The European Transport Board's Positions on the Proposed Amendment to Council Directive 96/53/EC

Introduction

The European Transport Board (ETB) represents decision makers from major European transportation and logistics companies controlling over 300,000 trucks and semi-trailers. Our focus areas are reducing environmental impact, congestion, and improving efficiency, safety, and competitiveness of road freight transport. We welcome the opportunity to provide feedback on the proposal to amend Council Directive 96/53/EC to align regulations with the future needs of European road freight transport.

Our positions:

1. Enable cross-border operations of longer/heavier vehicles between allowing Member States

The ETB proposes adding provisions to enable vehicles like Super Eco Combis, categorized as European Module System (EMS) 2, to operate cross-border without requiring bilateral agreements between neighbouring Member States.

Currently, even if two adjacent Member States permit EMS 2 vehicles nationally, the vehicles cannot cross borders without bilateral agreements. This restriction hampers efficient freight transport on major European routes.

The ETB suggests inserting a clause stipulating that if two contiguous Member States authorize EMS 2 vehicles nationally, then those vehicles should be permitted to cross the border without needing additional bilateral agreements.

2. Set EU-wide minimum permitted weights and dimensions

While the ETB supports the European Commission's efforts to harmonize rules through the directive, we remain concerned about flexibility granted to Member States to set their own minimum weights and dimensions.

This flexibility allows market fragmentation to persist, as operators face continued inconsistencies across Member States despite efforts to align maximum dimensions at the EU level.

For example, some Member States apply lower maximum weight standards than the 40 tonnes in the current directive. This leads operators to default to the lowest common denominator, hampering efficiency.

To truly create a level playing field for road freight, the ETB suggests that the European Commission considers setting consistent EU-wide maximum and minimum weights and lengths for heavy duty vehicles applicable across all Member States.

3. Enable faster permission of alternative propulsion systems for trailers to reduce CO2 emissions and provide an additional weight allowance

The ETB urges the European Commission to enable faster regulatory approval of alternative propulsion systems for trailers, such as electric drive trailers (e-trailers), across the EU. E-trailers can reduce CO2 emissions by improving the efficiency of truck-trailer combinations. However, uncertainties around permission are hindering adoption.

The ETB suggests that the European Commission include explicit provisions permitting these technologies in the amended directive.

Additionally, an extra weight allowance of 3-4 tonnes should be provided as an incentive for operators to invest in e-trailers, as the technology carries a weight penalty. This allowance will offset that penalty and accelerate uptake.

Enabling these technologies quickly under a harmonized EU framework and incentivizing adoption will support progress towards environmentally sustainable road freight transport.

4. Enable EU wide permission for e-recuperation axles and an additional weight allowance as an incentive

The ETB urges the European Commission to enable EU-wide regulatory approval of electric recuperation axles (e-axles) through the directive revision. E-axles recoup kinetic energy that is normally lost as heat, converting it into usable electricity onboard the vehicle.

This improves energy efficiency, lowers fuel consumption and emissions. However, uncertainty around permissions is limiting adoption.

The ETB suggests that the European Commission grant EU-wide permission for e-axles and provide a 1 tonne extra weight allowance as an incentive for operators to invest in this promising technology.

5. Incentivise zero emission HDV uptake by creating a European incentive scheme

One key objective of amending Directive 96/53/EC is accelerating the uptake of zero emission heavy duty vehicles (ZE-HDVs) in road freight transport.

While the ETB supports the increased weight and dimension allowances for ZE-HDVs in the current proposal, we believe a targeted EU-level purchase incentive program could further facilitate the transition to sustainable road freight mobility.

Some national incentive schemes already exist, like in Germany. However, minimum in-country mileage requirements make these unavailable to international carriers conducting cross-border operations.

To complement national programs and enable access for cross-border operators, the ETB suggests that the European Commission consider creating a co-funded EU incentive scheme for purchasing battery electric and hydrogen fuel cell trucks and coaches.

The ETB believes a harmonized European incentive program, designed for international usage, would provide a significant additional stimulus for ZE-HDV adoption across the continent.

Conclusion

The ETB welcomes the opportunity to engage with the European Commission on revising Council Directive 96/53/EC. We believe constructive dialogue between industry and policymakers will produce an amendment that balances objectives around reduced congestion, improved sustainability, and safety for road freight transport across Europe.