



John Berry
European Commission
DG Energy and Transport
Rue De Mot 28
1040 Brussels

2 February 2009, Brussels

Re: Comments to TM Leuven final study on the effects of adapting the rules on weight and dimensions of heavy commercial vehicles as established within Directive 96/53/EC

Dear Mr. Berry,

We would like to express our great disappointment with the conclusions included in Scenario 4 of the final report published two weeks ago by TM Leuven on 'Effects of adapting the rules on weights and dimensions of heavy commercial vehicles as established within Directive 96/53/EC'.

Scenario 4 which is supposed to reflect wishes of car transporters completely misrepresents the position of our industry.

First of all, the report states that the maximum dimensions studied under Scenario 4 would have a negative impact on the CO₂ emissions. This is completely incorrect for our industry. As demonstrated on a number of occasions the solution suggested by our industry of harmonisation of the loaded length of car transporters to 20.75m **would bring an 18.5% reduction in CO₂ emissions**.

Second of all, the report states that if the solution under scenario 4 was adopted, this would require new equipment. This is completely incorrect. The current car transporters can achieve the length of 20.75 meters just by extending an overhang in front or at the back. This does not require any new equipment. As presented and demonstrated in our contributions, many Member States already allow within their boundaries the trucks of the length over 18, 75 meters and up to 22,75 meters in some cases. Our proposal is to harmonise the maximum dimensions at the level of 20, 75 meters for the international traffic.

Thirdly, the report says that scenario 4 solution is less beneficial for safety. This is not correct. There are currently many trucks of 20, 75 meters and more being used on the roads in 14 Member States, which accounts for the vast majority of EU's Member States. The 14 countries are: Belgium, Czech Republic, Denmark, Estonia, Finland, Germany, Ireland, Italy, Lithuania, the Netherlands, Poland, Slovenia, Sweden and the United Kingdom. The experience in these countries shows that road safety is in no way affected. There are no significant changes to the braking, overtaking or swept path of the vehicles at 20.75 meters. In fact the opposite is true, harmonization at 20.75 meters should reduce the number of trucks on the roads and hence the risk of collision.

The incorrect conclusions of scenario 4 for the car transport industry are the result of mixing the proposals of the car transport industry and the chemicals industry in a single scenario (number 4).

This erroneous approach has been pointed out in our letter sent to the European Commission on 29 of August after the preliminary results of the study have been published.

Our argumentation was the following: TM Leuven's preliminary results failed to take into account the fact that the maximum weight of a fully loaded 20.75 meters long car transporter is 32.33 tonnes - well below the current limit for 18.75m trucks. This is of paramount importance in calculating the fuel consumption, the CO2 emission and all the other externalities. In fact while a fully loaded car transporter falls under the COPERT category 28-34 tons, a 44 tonne truck fall into a much higher category, the COPERT 40- 50 tonnes. Therefore if the results of the study from TM Leuven are correct for a 20.75 meters long truck with a weight of 44 tons, they are completely wrong for a fully loaded 20.75 meters car transporter.

By mixing the two proposals in a single scenario (number 4), the report completely ignored the specificity of finished vehicle logistics sector, which is that cars are a bulky but relatively light cargo. Even worse, the proposal of TM Leuven distorted the otherwise significant positive impact of the maximum length harmonization stipulated by ECG.

Adopting 20.75m as maximum permissible length for international trade within the European Union would cut CO2 emissions by over 30 kg per car on an average 1000 km journey and limit traffic congestion without any impact on road safety or road use. With over 22.000 car transporters run by ECG members and an estimated 30% more run by non-affiliated companies, this represents a significant reduction in the external costs generated by the road transport sector which should be recognized.

We are very disappointed that our suggestions have not been considered.

Additionally having studied the final report and in particular section 2.5 where all the stakeholders' recommendations are listed, we regret to see that despite our active involvement in the consultation process, our other contributions (sent both to the European Commission and TM Leuven) have either not been taken into account or have not been understood (list of activities below):

1. Solution to the maximum weights and dimensions bottlenecks in Freight Transport Bottlenecks Exercise, November 2007
2. Presentation in the stakeholders meeting on 4 March 2008 in Brussels
3. Participation to the Expert Workshop in Stockholm on 29 of April 2008
4. Submission of ECG's response to the document on the study on the effect of adapting directive 96/53/EC, 9 of May 2008
5. Letter to the Commission, 29 August 2008

Therefore we ask European Commission to consider our comments and provide us with an explanation.

As always we are available for any additional information.

We look forward to the response.

Best regards,



Mark Morgan
ECG Executive Director