

Mr. Ben Van Houtte
Head of Unit
DG TREN Unit B 3
B – 1049 Brussels

Brussels, 29 August 2008

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

Dear Mr. Van Houtte,

At the meeting of stakeholders that took place on the 4th of March, ECG presented the initial results of a study on the external cost of transport of new cars in Europe, made by the independent environmental NGO Friends of the Earth Italy. The study clearly indicated that a harmonization of the loaded length of car transporters to 20.75m **would bring an 18.5% reduction in CO2 emissions.**

The transport of cars is the only sector of the road transport industry where the maximum allowed loaded length is not harmonized at an EU level, ranging from 18,75m to 22.75m in different member states (and up to 25.25m under the modular concept in Finland and Sweden). As underlined by ECG, harmonization at 20.75m – a level today accepted by a majority of member states – would dramatically enhance the loading efficiency while lowering the external cost of transport as well as emission of all the pollutants in trans-European trade, which is currently governed by the law of the most restrictive country.

At the same meeting in March, a representative of the chemical industry advocated for an increase in the maximum permissible weight of heavy commercial vehicles to 44 tonnes. The final report of TM Leuven bundled the two requests and the resultant benefit on all external costs was insignificant – most notably because of the impact of a higher weight on road safety and road use.

In fact 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 falls 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.

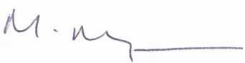
By mixing the two proposals in a single scenario (number 4), the report completely ignored the specificity of finished vehicle logistics sector, which is that cars are a bulky but relatively light cargo. Even worse, the proposal of TM Leuven distorts the otherwise significant positive impact of the maximum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

ECG suggests that the results of the Scenario 4 formulated by TM Leuven are modified to take into account the significance of Finished Vehicle Logistics. ECG is ready to share with the Commission the final results of its study on the External Cost of transport of new cars uniform value in Europe, carried out by the Friends of the Earth (Italy).

Best regards,

A handwritten signature in blue ink, appearing to read 'M. Morgan', followed by a horizontal line.

Mark Morgan
ECG Executive Director