

## Weights and Dimensions Directive

Brussels, 6 March 2024



(sent by email)

**Dear Honourable Member of the European Parliament,**

In the run-up to the vote in plenary on the proposed amendments on the Weights and Dimensions Directive 96/53/EC (WDD), the undersigned organisations wish to draw your attention that **in the absence of further amendments you will:**

1. Support a proposal that encourages the **cross-border circulation of 44t trucks, powered by internal combustion engines until 2035**, creating an incentive for fossil fuel burning vehicles, which goes against what is intended and at a time where the transport sector still sees an increase in emissions.
2. **Create an incentive for the widespread of 'Gigaliners' or 'mega-trucks'**, Longer and/or Heavier Vehicles (LHVs), also known as European Modular System (EMS) which are truck and trailer combinations that are typically 25.25m in length, nearly 9m longer than standard lorries in Europe, and weighing 60t. They are as long as six passenger cars and a little shorter than, but weighing as much as, a fully loaded Boeing 737-300. LHVs have been allowed until now under strict conditions, as part of trials or special bilateral agreements. The impacts on road safety of wider adoption of 'giga-liners' across the EU have not been fully assessed.
3. Contribute towards the uptake of 'gigaliners', powered by the same internal combustion engines, **increasing the already significant competitiveness gap between road and rail**, hampering efforts to promote intermodality and favouring a reverse modal shift towards road, a mode which has higher emissions, lower energy efficiency and safety standards and, therefore, raising increase concerns on the impacts of LHV circulating through fragile regions such as the Alps.
4. Set the conditions for the **dissemination of vehicles that will accelerate road infrastructure degradation**, leading to more frequent maintenance and safety issues. 'Gigaliners' require adapted infrastructure, posing challenges in work zones, parking, resting and re-fuelling areas, where conflicts with other road users are likely. **Existing truck safety facilities are not designed for 'gigaliners'**, including barriers, ramps and lay-bys. Fire safety in tunnels is a concern, especially with LHVs potentially blocking traffic lanes in roll-over crashes. 'Giga-liners' can struggle with intersections, might use space for vulnerable users during turns, potentially encroaching on pavements or cycle paths.
5. **Facilitate the use of vehicles, for which current available technologies are not able to offset safety risks.** Technologies required under the EU General Safety Regulation, such as Advanced Emergency Braking Systems (AEBS), are not tested on 'gigaliners' and may not be effective, significantly increasing the reliance on the human factor, resulting in an increased risk of accident, particularly in the heavily used road network in some parts of Europe.

In short, without being amended, the proposal you are voting on, risks harming European citizens in several ways. It fails to capture the full impact on the freight sector as a whole and the objective of promoting decarbonisation, reducing harmful emissions and preserving high safety standards in transport.

We urge you to prioritise zero emissions vehicles, and keep the current restrictions on circulation of 'gigaliners'.

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Yours sincerely,

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**CER**



**Conor Feighan**  
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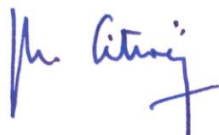
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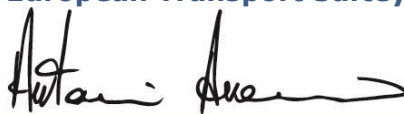
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