

H.E. Ambassador Raúl Fuentes Milani
Deputy Permanent Representative
Permanent Representation of Spain to the European Union
Boulevard du Régent 52
1000 Brussels
BELGIUM

Brussels, 20 November 2023

Re: Call to use the weights and dimensions framework to support a significant uptake of zero-emission heavy-duty vehicles

Dear Ambassador Fuentes Milani,

The Review of the Weights and Dimensions Directive (W&D Directive) is an important element of the regulatory framework to facilitate the market uptake and use of zero-emission heavy-duty vehicles (ZEVs), namely battery-electric and hydrogen-powered trucks and buses.

In light of the ambitious CO₂ reduction targets currently being discussed for the sector, it is important to recognise that transport operators will only be able to fully embrace the new technologies if loading capacity and operational flexibilities are largely maintained.

By this letter, IRU and ACEA, representing road transport operators and vehicle manufacturers, call for your support to firmly put zero-emission vehicles on a level playing field with conventionally powered trucks and buses through the revision of the W&D Directive.

While the European Commission has made a balanced proposal, we are concerned about recent developments in the discussions in the European Parliament and Council.

Zero-emission vehicles come with additional requirements regarding their size, total weight, and weight per axle.

Installing the new powertrains and adequate battery or hydrogen storage capacities entails higher weight requirements and would restrict vehicles' payload capacity if the Weights & Dimensions Directive is not adjusted. Only if their additional weight requirements can be compensated will it be possible to accommodate zero-emission powertrains in a wide range of vehicle segments without sacrificing payload and thus reducing their competitiveness.

The additional weight allowance will only be fully usable if, at the same time, the driving axle weight is increased by 1 tonne from the currently permitted 11.5 tonnes. The increase to 12.5 tonnes is therefore a crucial prerequisite without which it will not be possible to fully benefit from the additional weight allowance. Despite a moderately higher driving axle weight, the overall impact on road and tyre wear will be further mitigated due to inner-vehicle weight distribution adjustments that will become possible with the new provisions. The more flexibility manufacturers have to redistribute the weight of the vehicle to the drive axle, the lower the impact will be on road wear.

The additional length granted for zero-emission vehicles is an equally crucial prerequisite to enable the swift transition of a wide range of vehicle segments to zero-emission powertrains.

If vehicle manufacturers would have to redesign all cabs, which under the current provisions give additional flexibilities for the length of vehicles, the transition of a wide range of vehicle segments to zero-emission powertrains will not be as swift as is required by the ambitious CO₂ standards currently discussed.

As the transposition of the revised rules into national law will take significant time, it is imperative that the W&D Directive revision is agreed upon as a matter of priority, while ensuring that the key objectives of the review are maintained.

We thank you for your consideration and count on your support.

Sincerely,



Thomas Fabian, Commercial Vehicles Director, European Automobile Manufacturers' Association (ACEA)

ABOUT ACEA

The European Automobile Manufacturers' Association (ACEA) represents the 14 major Europe based car, van, truck, and bus makers: BMW Group, DAF Trucks, Daimler Truck, Ferrari, Ford of Europe, Honda Motor Europe, Hyundai Motor Europe, Iveco Group, Jaguar Land Rover, Mercedes-Benz, Renault Group, Toyota Motor Europe, Volkswagen Group, and Volvo Group. www.acea.auto



Raluca Marian, Director EU Advocacy and General Delegate, IRU Permanent Delegation to the EU

ABOUT IRU

IRU is the world road transport organisation, promoting economic growth, prosperity, and safety through the sustainable mobility of people and goods. Founded in 1948, IRU has members and activities in over 100 countries. www.iru.org