

CEPI aisbl 250 Avenue Louise, Box 80 B-1050 Brussels, Belgium Tel +32 2 627 49 11 Fax +32 2 646 81 37

www.cepi.org www.paperonline.org www.cepi-sustainability.eu www.paperforrecycling.eu

Position Pap	er	

November 2013

Road freight transport Weight & dimensions' limits: let's make the best use of Europe's roads!

The Directive 96/53/EC on Weights & Dimensions¹, which is currently under review, regulates the weights and dimensions of heavy-duty vehicles operating as international and national transport within the EU. Under certain circumstances, and in line with the principle of subsidiarity, the Directive also permits Member States to provide derogations.

Road: the predominant mode of transport for freight today and tomorrow.

Trucks dominate inland EU freight transport² with a 72% share of the tonne-kilometres and account for about 94% of the CO2 emissions. There are currently 6.5 million heavy goods vehicles in circulation in the EU, transporting more than 80% of goods in volume (tonnes) and more than 90% of goods in value.

Road transport is, in general, the most flexible and efficient mode of transport when considering short distances and, for sure, the last miles. This is the only mode of transport that can ensure door-to-door delivery of goods to customers. While all transport modes are needed, the 2011 White Paper on Transport recognises that road transport will continue to be the predominant mode in the future. Road should therefore be considered in a non-discriminatory way.

The European paper industry makes use of the three basic modes - rail, road and water, but like many industry sectors, road is the main mode of transport for European distribution and it is expected to remain the case in the future. A vast majority of the yearly 250 million tonnes of the paper industry raw materials and finished products is indeed transported by road in Europe. Around 55% of road transport concern long distance trips, 30% regional distance and the remainder local distance. Logistics costs average 10% of turnover.

VAT BE 0447 185 143
ING 310-0943243-04
ING IBAN BE 10 3100 9432 4304
ING BBRUBEBB

¹ COUNCIL DIRECTIVE 96/53/EC, of 25 July 1996, lays down for certain road vehicles circulating within the EU the maximum authorized dimensions of national and international traffic and the maximum authorised weights of international traffic.

² According to EU Commission statistical pocketbook 2013 (2011 data), the share of intra-EU freight transport is 45.3% for trucks 36.8% for seagoing ships, 11.0% for rail and 3.7% for inland waterways. Road accounts for 71.8% of the EU27 of inland freight transport in billion tonne-km, rail 17.4%, inland waterways 5.8% and pipelines 4.9%.



Future challenges need to be addressed to secure long-term competitiveness and sustainability.

The main challenges to be faced by road transport relate to increasing costs, the shortage of drivers across Europe, the growing level of road congestion and the rising level of greenhouse gas emissions (GHG emissions).

Road transport costs have grown over the years because of rising fuel price, road charging and truck drivers working regulations and increasing wages. This impacts the price of raw materials and goods and consequently the overall competitiveness of the industry.

Further cost increases are expected in the coming years due to further internalisation of external costs - to meet stricter emission targets, rising road charging and stricter minimum safety standards. Although road cannot carry everything, the ability of rail and other modes of transport to help overcome these challenges remains very limited. There is often no affordable and efficient alternative to roads unfortunately.

Significant efficiency gains are possible and can deliver competitiveness and sustainability for shippers and the EU economy.

As said in the EU Commission's White Paper, urgent action is needed to make road transport more resource-efficient and to further integrate the various transport modes to achieve a true Single European Transport Area. Road should have its efficiency pushed to the optimum to deliver its full potential in a sustainable way, i.e. by reducing its GHG emissions and without neglecting road's safety and security. All opportunities to reduce GHG emissions must therefore be considered.

Smart innovations to improve aerodynamics and reduce fossil fuel consumption and derogations to allow their implementation, as proposed by the EU Commission, are a step in the right direction. However, increasing incrementally the weight and dimensions' limits and payload of trucks in legislation is one of the most cost-efficient and sustainable solutions.

Trucks weight and dimensions' limits are one of the main bottlenecks that need to be addressed. 44 tonnes should be considered as a minimum weight limit in all EU Member States.

For international transport, Directive 96/53/EC sets limits to vehicles engaged in international transport to 40 tonnes and 18.75 meter of length, with the exception of intermodal transport where a maximum of 44 tonnes is permitted in a range of 150 km. However, individual Member States can allow higher weight limits on their roads.

The paper industry sector, like chemicals, steel, building, wood and petroleum is affected by weight restrictions because it transports mainly heavy goods. However, dimension restrictions hit also some segments of the paper industry that require high volumes.

Some countries like Germany and Spain apply a 40 tonnes limit for road transport and 44 tonnes limit for intermodal transport. But some others have allowed 44 tonnes for all transports - Belgium, France, Italy, and Luxemburg on 5 axles or United Kingdom on 6 axles. Even higher weight limits prevail with 48-50 tonnes in Czech Republic, the Netherlands, Norway, 60 tonnes on 7 axles in Denmark and 5 axles in Sweden, and even 76 tonnes in



Finland on 9 axles. Several years of experience with heavier vehicles on relevant roads in those countries has not revealed any particular safety issues or infrastructure problems.

Allowing longer trucks and trucks able to carry heavier payloads is crucial in the context of the Directive's revision. Increasing the authorised maximum weight and promoting the European Modular System (EMS) have to be considered since it would result in a decrease of the number of trucks on the road and road freight journeys, while addressing drivers shortages. It would reduce congestion on European roads and transport costs, give a boost to European industry's competitiveness; and, as important, reduce fuel consumption and emissions.

CEPI supports the EU Commission's proposal to extend the provision authorising the circulation of 44-tonne combinations of vehicles with 5 or 6 axles transporting 40-foot containers for intermodal transport to those carrying 45-foot containers.

EMS: let subsidiarity and innovation prevail!

The use of EMS should be promoted for relevant infrastructure. It can significantly help accommodate the growth of needed road transport volume by delivering additional loading capacity, higher resource efficiency and fewer trips without increasing risks of accidents, more wear and tear on roads and without major investment in infrastructure. All this has been proven in trials in, amongst other countries, Denmark, Norway and the Netherlands, and where the full operation of such modular combinations is already permitted, such as in Sweden and Finland.

CEPI, like many other European and national trade organisations supports the EMS³. The EMS is a concept that allows combinations of existing loading units (vehicles and load modules) into longer and sometime heavier vehicle combinations to be used on some parts of the road network, but obviously not in city centres or any other sensitive areas. Indeed, based on standard modules, it gives high flexibility to operators to adapt the vehicles to different situations, offers the possibility to use long combinations when possible and shorter combinations when necessary, and favours co-modality. As it is based on existing equipment, it is easy to implement and very easy to rearrange to shorter combinations and adapt to local conditions.

EMS already operates in several Member States under certain circumstances and conditions and offers industry a much needed efficiency and a greener alternative to many other current logistics solutions. EMS favours the development of intermodal transport and co-modality and supports the development of other transport modes like rail since it is built on using standard ISO 20 and 40 feet containers common also to rail and maritime freight transport. Allowing longer trucks on the roads would not shift substantial volumes of loads from rail to road as goods transported by road tend to be higher value goods, whilst rail is more suited to lower value goods. Road and rail are indeed complementary modes with limited areas of competition.

_

³ These organisations are members of the EMS Forum: http://www.modularsystem.eu/



Cross-border trips with higher capacity trucks and EMS should be allowed and only subject to agreement between the concerned Member States.

The Directive's revision should enable higher weight limits for cross-border trips. Single compartment articulated vehicles with an upper limit of 44 tonnes for road transport (on five axles) and 50 tonnes (on 6 axles) for intermodal operations across Europe should be allowed for instance. Cross-border trips with even higher capacity trucks between two or more neighbouring countries that have the same limits should also be allowed.

By maintaining a weight difference between road transport and intermodal transport for single-compartment vehicles, there is no risk of a reverse modal shift from intermodal to road transport.

Industry is indeed often impacted by the lowest authorised vehicle weight limit on the route, which leads some time to absurd situations. Belgium has a maximum authorised weight of 44 tonnes for five-axle road haulage combinations like France⁴, but because of the EU Directive, at the border, the weight of the vehicle must be reduced to 40 tonnes. Once it has crossed over into the other country, the weight limit applicable is again 44 tonnes.

Low weight limits lead to additional costs and hinder smooth transport of goods throughout the EU and constitute an obstacle to the well-functioning and the completion of the Single Market. Permitting international transport with higher load deliveries across the EU and discouraging any cross-border barriers that limit its benefits would result in savings for all economic operators and would have a positive impact on energy consumption and the environment.

A recent EU Parliament study⁵ concludes that cross-border use with EMS vehicles would help at-source greening road transport, steering combined transport and further supporting an efficient EU transport network involving all modes of transport, including road.

The creation of specific corridors for bigger trucks between Member States should be also encouraged.

Industry and shippers' voice should be heard when considering the review of the Directive 96/53/EC.

Competitiveness and sustainability should be the key objectives when considering the review of the Directive 96/53/EC. It should aim at higher efficiency of the road transport to the benefit of the industry and the whole society by keeping our economy moving and enhancing the functioning of the internal market.

The paper industry as well as other industry sectors would benefit from increased weight and dimensions' limits throughout the EU, with the necessary restriction on axles pressure.

CEPI believes that the authorised maximum weight should be increased as a general rule and, based on extensive trials, the use of EMS promoted. Cross-border trips between Member States where the same weight and dimensions' limits prevail should be allowed.

⁴ Since 1 January 2013, France has increased the statutory limit to 44 tonnes for transport within the French territory. Before 1 January 2013 the limit - with a few exceptions - was 40 tonnes.

⁵ "THE IMPACT OF MEGATRUCKS" - EU Parliament Transport & Tourism Committee, July 2013.



Innovation, smart solutions and rationalisation in the transport and logistics field can have a great impact on competitiveness and sustainability and should therefore be promoted, to contribute to the EU 2020 strategy about sustainable growth and jobs and the success of an ambitious industrial policy.

Note to the Editor

CEPI aisbI - The Confederation of European Paper Industries

The Confederation of European Paper Industries (CEPI) is a Brussels-based non-profit making organisation regrouping the European pulp and paper industry and championing this industry's achievements and the benefits of its products.

Its collective expertise provides a unique source of information both for and on the industry; coordinating essential exchanges of experience and knowledge among its members, and with the industry stakeholders. Through its 18 member countries (17 European Union members plus Norway) CEPI represents some 550 pulp, paper and board producing companies across Europe, ranging from small and medium sized companies to multi-nationals, and 1000 paper mills. Together they represent 24% of world production.

Website: www.cepi.org/