

UIP POSITION PAPER

25/01/2022

UIP contribution to the Commission's call for evidence commercial vehicles – weights and dimensions (evaluation)

The proposal suggests increasing the authorised length of road vehicles by 15 cm in order to facilitate the intermodal transport of 45-foot containers while increasing the authorised weight to a total of 44 tons for three-axle motor vehicles with two- or three-axle semi-trailers and to 42 tons for two-axle motor vehicles with three-axle semi-trailers. While we generally appreciate all efforts facilitating intermodal transport, with this position paper, the International Union of Wagon Keepers (UIP) urges the European Commission to take the following aspects into consideration in order to avoid creating unfair market advantages for road transport to the detriment of the greenest mode of transport: rail.

The 44-ton truck is not an effective contribution to climate protection

While the 44-ton truck may enable quick wins in CO₂ reduction on a small scale when only looking at the road sector in isolation, **a 44-ton truck could nowhere near hope to match the climate benefits of rail: freight trains are six times more energy-efficient than trucks and they produce 80 percent less CO₂.** Accordingly, the environmental advantage of rail cannot be offset with heavier trucks, certainly not with 4 tonnes more load per vehicle. Another aspect not sufficiently considered in the proposal is the disproportionate higher wear and tear on the road infrastructure by heavier trucks. An effect still worsened by the fact that road users do not pay for their negative externalities whereas railways pay for their infrastructure use with track access charges.

Heavier trucks lead to unfair market distortion and an unintended shift to road

In the logistics market, the price per tonne transported determines which route the goods will take. **4 tonnes more permissible total weight means 10 per cent more load weight on each truck trip at the same cost. Correspondingly high would be the loss of transport volumes for rail freight which cannot compensate for this competitive disadvantage.** Thus, a general authorisation of 44-tonne trucks will lead to more traffic on the roads instead of shifting transports to the railways. Consequently the entire rail freight transport sector is threatened with a noticeable loss of orders due to the 44-tonne truck.

Another important aspect to consider is that more load weight for the roads weakens the railways not only in the short term but also in the long run: Chipping away at railway's already narrow profit margins, it deprives the sector of the necessary economic leeway needed for the urgently needed future investments in innovative technology and digitalisation. This in turn would further impact rail's competitiveness vis-à-vis road transport and hamper the EU's objective of increasing rail's modal split to 30% by 2030.

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“European Modular Systems” is just a euphemism to introduce ‘Gigaliners’ or ‘long trucks’ with their negative externalities all across Europe.

Apart from the already mentioned negative modal shift effects for rail freight transport, these vehicles of up to 25.25 metres and with an allowed extra weight up to 60 tonnes in cross-border transport, among others, would have the following disastrous effects:

- Rising road infrastructure costs;
- Deteriorating environmental performance due to the increase of cheaper road transport volumes and thus increasing environmental damage;
- Decreasing road safety for other road users especially cyclists, pedestrians, motorists;
- Adverse impact on railway crossing safety (longer approach times);
- Contradiction to the transport policy objectives of the SSMS.

Allowing ‘Gigaliners’ would therefore reduce the internal costs of road freight transport and tend to increase the external costs borne by the European taxpayer. This would make it more difficult to achieve the transport policy objective of shifting traffic from road to rail.

The proposal would negatively impact both conventional as well as combined transport.

Whereas combined transport grants certain advantages for transport operations including the transport leg transported on the road, we must not forget that the underlying overall goal is to incentivise the performance of the majority of ton kilometres by rail, the greenest mode of transport. By simply enabling trucks with more load weight these advantages would be nullified. In addition, the longer semi-trailers of the heavier trucks cannot be loaded onto wagons in unaccompanied combined transport thereby actually becoming a hindrance for intermodal transport.

The rail sector would thereby be doubly affected as **the current text would not only make traditional rail transport less competitive but would also cut the growth of the important future combined transport segment.**

Key conclusions

Based on the above, it can be said that a weight increase of 4 tons does not offset the climate advantages of rail and that 44-ton trucks even reduce incentives to use the more environmentally friendly mode of transport rail. Consequently, heavier trucks lead to unfair market distortion and an unintended shift to the road. Contrary to the proposals’ goal they would even hamper intermodal transport and thereby have a negative impact on the EU’s climate balance.

Instead of making road transport more attractive for shippers to the detriment of rail freight’s competitiveness, we strongly call on the Commission to acknowledge that the EU’s Green Deal objectives can only be achieved by fostering a true shift to rail and working together with the sector on promoting that shift. Consequently, we hope the Commission will refrain from its original proposal and not increase the competitiveness of road in wagonload traffic without compensation for rail freight traffic.

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The Commission needs to acknowledge that allowing ‘Gigaliners’ would reduce the internal costs of road freight transport while at the same time increasing the external costs borne by the European taxpayer.

We furthermore recommend only granting advantages aimed at facilitating the intermodal transport of 45-foot containers when it can be ensured that rail freight benefits equally and no competitive advantage is given to road operators.

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Founded in 1950, the UIP – International Union of Wagon Keepers, with its seat in Brussels, is the umbrella association of national associations from fourteen European countries, thus representing more than 200 freight wagon keepers and ECMs with more than 220'000 freight wagons, performing 50 % of the rail freight tonne-Kilometres throughout Europe. The UIP represents the members' concerns at international level. By means of research, lobbying and focused cooperation with all stakeholders and organisations interested in rail freight transportation, the UIP wants to secure on the long term the future of rail freight transport. www.uiprail.org

