

The European Association for Electromobility

### **REACTION PAPER**

# Commission's proposal on the Weights and Dimensions Directive



AVERE welcomes the European Commission's proposal revising the Weights and Dimensions Directive which is a key element to accelerate the market uptake of battery-electric heavy-duty vehicles which currently are heavier than their internal engine counterparts but contribute in a more significant way to the transport emission reduction objectives. As the European Parliament and Council are about to begin the process of amending the legislation, we call on co-legislators to:

### Maintain the proposed increased weight allowances for zero-emission trucks and establish a mandate for additional weight allowances for national transport

We support the Commission's proposal to increase the permissible weight allowance trucks to weigh 4 tonnes more than a fossil fuel truck. AVERE also supports the application of the rules to the total mass of vehicles, which in practice means that light weighting will be incentivised.

We regret, however, that this proposal still only applies to border crossings. Given that 60% of road freight is transported domestically, it is essential that the legislation includes a mandate for additional weight tolerances in domestic transport as well.

## 2. Ensure that zero-emission trucks benefit from additional weight allowances everywhere in Europe

AVERE regrets the proposal to automatically accept 44t diesel trucks on border crossings between countries that have higher national allowances. This measure does not accelerate the transition to zero-emission trucks. It only gives an incentive for cargo to be moved from rail to diesel trucks.

Countries that allow higher weight allowances for diesel trucks need to automatically award the additional 4t to zero-emission vehicles. Otherwise, zero-emission trucks will only gain a competitive advantage in countries that have the lowest weight allowance of 40t.

### 3. Include a zero-emission mandate for European Modular Systems

AVERE is concerned with the proposed provision on the European Modular Systems (EMS) as it does not provide an incentive for transitioning to zero-emission trucks.

That's why AVERE believes that the requirement for 100% of EMS trucks to be zero-emission by 2030 would encourage fleet operators to accelerate the adoption of zero-emission trucks.

### 4. Start inter-institutional negotiations before the end of 2023

Last but not least, AVERE calls on co-legislators to take up the issue swiftly in order to rapidly adopt rules that will enable the rapid adoption of battery-electric trucks in the European Union.

AVERE calls on the Council of the European Union to reach a General Approach by the end 2023 and on the European Parliament to finalise its position by the end of 2023 as well.