

ASECAP statement on open public consultation on revising Directive 96/53/EC on weights and dimensions of heavy-duty vehicles

ASECAP, European Association of toll motorways, tunnels and bridges operators and their members which are toll road infrastructure Companies would like to take the opportunity of the public open consultation on revising Directive 96/53/EC, setting standards for the maximum authorised weights and dimensions of heavy-duty vehicles to draw awareness of the impact of this measure on existing road infrastructures.

ASECAP considers that the policymakers, must first consider the following infrastructural aspects as key elements/inputs for their analyses. Motorways built in Europe are designed to meet the existing standards of weights and dimensions for a long-term perspective going beyond 45 years and even more. **The existing motorways' network is not designed for the longer and heavier vehicles that the Commission would like to introduce.**

The change in maximum permissible weights and dimensions, as specified in the draft to revise Directive 96/53/EC, is very far-reaching and requires a detailed consideration of the effects on high-level road infrastructure as follow:

1. **The consequence of the planned increase in weight (total weight and higher axle loads) will require recalculation of the structural capacity of all, especially the old bridges**, some of which may not be able to carry the increased loads. In case that the higher loads can be structurally accommodated there will be a reduction in the life cycle of the road superstructure, as well as an increased load on the bridge structures. This leads to an increased need for maintenance and an increase in availability-limiting construction sites on the high-level road network.
2. **The planned release of a vehicle height of 4.3 m for regular operation is not possible across the entire European road network due to the geometrical conditions on the motorway network.** In the area of tunnels, the prescribed minimum clearances cannot be maintained, and the tunnel lighting, exhaust fans and other equipment placed on the ceilings, as well as the ceilings themselves are exposed to a significant risk of being damaged. Furthermore, a significant increase in tunnel closures due to the triggering of height controls is expected. This leads to considerable availability restrictions and a decrease in traffic safety, as well as traffic jams.
3. **Negative effects on bridges; bearing structures have to be massively reinforced due to the heavier loads but also to maintain the current safety standard.** The acceleration and accentuation of fatigue phenomena on pavements and structures, with repeated passages of stresses at high sized limits, lead to potential long-term degradation that is difficult to estimate. In cases of a crash, higher dynamic stresses which are triggered by mega-trucks must be absorbed by crash barriers of greater dimensions. Since these dynamic forces must also be absorbed by the bearing structure, this too would have to be massively reinforced.
4. Negative effects on Tunnels; several European countries have territorial characteristics (Alpine regions etc.) that consequently lead to remarkably high proportion of tunnels. **Increasing the maximum authorized truck dimensions also increases the fire load (proportionally to the cargo which is carried). This requires massive structural changes to the tunnel cross-sections.** The parking niches/breakdown bays and the dimensioning of the crosscuts have not been dimensioned for gigaliners. The safety installations and the estimation of the danger would thus have to be completely reassessed.

Concluding remarks

For all these reasons, ASECAP has strong reservations about any increase in the maximum weight and the dimensions of heavy goods vehicles in the current state of knowledge. ASECAP highly recommend making deep analysis of impacts first and take into consideration aspects detailed hereafter.

An increase in weight (+ 4t) and dimensions (especially height to 4.3 m) has a detrimental impact on existing road infrastructure, road safety and availability and should therefore temporally limited for weight increase and be rejected for height increase from the point of view of ASECAP. In any case, in the course of a temporally increase of the weights and dimensions, compensation measures would have to be demanded that make road freight transport safer overall and appreciate the protection of residents accordingly. **The appropriate framework conditions for far-reaching and, if possible, digital enforcement must be established. This applies to on-board systems as well as infrastructure-related systems.**

A general review of this legislation leading to change the existing maximum weight and dimensions would require massive investments and infrastructural adjustments. **The revision of the Directive should include clear provisions to compensate road operators for such cost increase.**

About ASECAP:

ASECAP is the European Association of Operators of Toll Road Infrastructures across 18 member countries representing 125 companies employing more than 44.000 direct jobs and 200.000 indirect jobs. They operate, maintain, manage a network of around 82.000 km with a long-term vision that ensures highest quality standards to make the road infrastructure safest thank to the user/payer principle providing sustainable financing. ASECAP members are strongly committed to reduce carbon footprint of road infrastructure and reach vision zero target set up by the European Union and United nation.

Contact persons:

Malika Seddi –Secretary General (m.seddi@asecap.com)

EU transparency register: 76903725494-68