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## **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 toll road infrastructure Companies would like to take the opportunity of the public open consultation on revising Directive 96/53/EC on weight and dimensions of heavy duty vehicles to express concerns.

ASECAP considers that the policymakers, must first consider the absorption capacity of the infrastructure to host the mega trucks.

More specifically, they must 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 more. The existing motorways' network is not designed for longer and heavier vehicles the Commission would like to introduce. The basis for national and European regulations and therefore also for infrastructure planning & building is Directive 96/53/EC which sets out the maximum allowable vehicle loading dimensions in national and international road transport in the EU. A general review of this legislation leading to change the existing maximum weight and dimensions would require massive investments and infrastructural adjustments.

Any further increase in the maximum weight and the dimensions of heavy goods vehicles would lead to several problematic pitfalls, including:

1. Negative effects on bridges bearing structures; bearing structures have to be massively reinforced due to the heavier loads but also to maintain the current safety standard (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);
2. 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 cross cuts have not been dimensioned for gigaliners. The safety installations and the estimation of the danger would thus have to be completely reassessed.

3. Negative effects on bridges. Bearing structure have to be massively reinforced due to the higher 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.
4. This would increase road safety risks, by increasing visibility problems for other users, in particular in insertion curves and ramps, or by masking signs, and would limit the possibilities of drawdown and insertion.
5. The psychological impact to light vehicles' drivers: the behaviour of light vehicles drivers in response to such increase should not be underestimated.
6. Access/capacity limit to rest areas and parking lots: as it is mandatory to comply with driving periods and rest obligations, the increase of the maximum weight and the dimensions of heavy goods vehicles would cause serious difficulties in terms of secure parking capacity.
7. Difficulties on links between primary and secondary roads (ie,: junctions, roundabouts): applicable regulation and parameters for road constructions refer to "standard vehicles" which are currently in use.

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 members would like nevertheless to recommend that the revision of the Directive 96/53/EC on weight and dimensions of heavy-duty vehicles should consider the ambition to have net carbon heavy duty vehicles to reach the challenges set up in the Green Deal, Fit for 55 and climate change objectives. From that perspective, the deployment of alternative fuel for heavy duty vehicle will be a priority and it will require huge investments to finance it.

**About ASECAP:**

***ASECAP is the European Association of Operators of Toll Road Infrastructures across 20 member countries representing 135 companies employing more than 50.000 direct jobs and 200.000 indirect jobs. They operate, maintain, manage a network of more than 86.000 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.***

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