AK EUROPA

Position Paper
October 2023
Transport&Environment

Maximum permissible dimensions and weights of lorries in European road freight transport

COM(2023)445

Executive Summary

- In terms of content, AK supports „Vision Zero“, which is intended to lead to greater road safety and a strong reduction of fatalities and serious injuries in road traffic by 2050.
- AK likewise supports the greening of European freight transport. Promoting the sustainability and compatibility of all modes of transport, as well as increasing efficiency, is essential and must be pursued rapidly.
- However, we strongly oppose individual proposals that are spuriously linked to the Green Deal. In our view, the Europe-wide introduction of over-long and over-heavy lorries („gigaliners“) creates more problems than it solves.
- The expected investment and repair and maintenance requirements would be enormous, whilst the conversion would ultimately be pointless. The road infrastructure in Austria and other Member States is designed for vehicles up to 40 tonnes. The necessary structural adjustments to roundabouts, motorway intersections, junctions, bridges, tunnels, overhead displays and rest areas would consume billions of euro.
- In addition, infrastructure maintenance requirements would increase exponentially as vehicle weight increases. Due to the geographical conditions (mountains, numerous tunnel sections and narrow valleys), both the regular operation and mere transit of such vehicles would not be possible in all parts of Austria.
- As far as the progressive increase in length and weight limits is concerned, AK also sees the problem of increasing competitive pressure in road freight transport. In any case, the economic pressure arising from competition from other Member States on domestic freight forwarders and transport companies would increase.
- As an employee representative body, AK firmly rejects „gigaliners“. By changing the existing regulations and thus making the transport of goods by road even cheaper, the pressure on drivers would increase further: More responsibility, liability issues, increased training needs, longer loading and unloading times. A further decline in already low wage levels may be expected to result in a „race to the bottom“ and an „exodus“ from the industry (comparable to conditions in the hotel and restaurant industry).
- AK is of the opinion that a consistent policy of shifting freight from road to rail and the efficient expansion of combined transport across Europe in this area is the most sensible instrument for reducing greenhouse gas emissions and for greater climate justice.
- Rolling highways, as a special form of modal shift, is also an important transport policy measure for relieving the pressure on sensitive areas such as the Alps. The incompatible dimensions and weights of gigaliners make it impossible to use combined transport.
- The constant increase in empty lorry runs should also be noted. In 2019, 34 percent of the kilometres driven by lorries in Austria were empty. That stands as the negative record to date. Reducing such empty runs within the EU would make a significant contribution to reducing harmful emissions. Fewer empty runs would also have the positive side effect of alleviating the Europe-wide problem of a shortage of drivers.
- „Weight problems“ do not only exist with regards to gigaliners; apparently many lorries are already over-loaded on the road. They thus represent a safety risk in road traffic and place an additional burden on the environment. Only increased technical checks can remedy that situation. In the meantime, there are also greater technical possibilities to perform highly precise measurements.

AK's position

Background

Once again, the Commission is pushing to establish the approval of gigaliners (extra-long and/or extra-heavy lorries) across the board throughout the EU. The Commission is making such efforts with increasing frequency, with the reasons given for this ranging from combatting the shortage of drivers to increasing road safety and alleged environmental protection.
Aside from the fact that AK does not consider those considerations tenable, the introduction of gigaliners in Austria and other Member States with similar transport infrastructure would cause a number of considerable problems. For the reasons mentioned above, AK continues to vehemently oppose the introduction of gigaliners.

Modal shift issue or the eternal competition between road and rail

The introduction of gigaliners would thwart the successful and environmentally sensible shift in freight transport from road to rail. Studies have proven that repeatedly and clearly. Gigaliners and the effects of their use blatantly contradict the goals of the Green Deal and the Green Freight Package. The necessary infrastructure costs (e.g. for road wear, adjustment of rest area sizes, tunnel heights, level crossings and for space and avoidance problems on mountain roads and passes) are enormous and unmanageable for public budgets in times of inflation, especially since the costs caused by the Coronavirus relief measures will also burden national budgets for years to come.

The introduction of "gigaliners" would inevitably lead to a shift from rail to road, which would not only have negative environmental consequences but would also pose an economic problem for rail infrastructure in particular. That would result in a decline in rail freight transport and therefore the loss of skilled domestic jobs in the rail sector.

In addition, we refer to the applicable regulations on level crossings in the EU. The use of lorries with trailers exceeding 20 meters would result in the required approach time to level crossings becoming longer, which in turn would result in higher required sight distances and switching distance lengths. Longer vehicles would mean longer barrier opening times and require a revision of all passenger and freight rail transport. That would interfere massively with the overall schedule structure and, in turn, would lead to restrictions in traffic flow.

Larger lorries are particularly problematic and dangerous in regards to overhead rail lines. If problems occur there due to the height of the freight or lorry and a gigaliners „breaks down", the drivers are absolutely at risk of death. Even if the distance from the overhead line to the lorry is up to one and a half metres, the current can jump in an arc – representing a danger to life even in that case.

All level crossings would therefore have to be checked and technically re-equipped. That would also necessitate new inspections by the relevant authority. It should be recalled here that the prescribed ongoing technical inspections are not being performed „on time" even now and are massively „behind schedule". In addition to the technical, regulatory and administrative effort, the financial outlay would also be enormous. The necessary funds are then not available for the necessary expansion of the rail infrastructure.

All measures to promote combined transport, as demanded and intended throughout Europe, would be futile because the desired shift in freight transport would fail to materialise. In addition to obstacles to the modal shift, problems with financing the necessary rapid and efficient expansion of rail and loading infrastructure are also to be feared.

Road safety considerations

The number of accidents involving lorries is generally on the rise. Gigaliners further increase the risk of serious traffic accidents. Recovery vehicles (such as those used by the fire service) are designed for a maximum weight of 40 tonnes. Gigaliners here would lead to high acquisition costs for the emergency services. The road infrastructure in densely built-up and geographically challenging regions (mountains and narrow valleys)

is generally not suitable for the use of gigaliners. The transport infrastructure is designed for the maximum dimensions of the lorries in use today, so it would require extremely extensive structural adjustments. This applies to parking spaces in rest areas, lay-bys on motorways, the load limits of guide rails and, in general, curves that are absolutely not designed for longer vehicles with corresponding speeds.

The use of gigaliners would also be particularly critical on roads lower in the hierarchy, where conventional lorries already regularly cause dangerous situations for other road users at intersections or roundabouts. The use of over-long lorries would significantly increase the danger on the roads. Increased hazards during overtaking manoeuvres and blind spot issues would be exacerbated as larger vehicles make it even more difficult to see and keep track of other vehicles. Not only do gigaliners automatically increase the lack of visibility for all road users, but the additional weight also poses an increased risk of accidents.

Avoidable empty runs – logistics on the road

In connection with the planned introduction of gigaliners across the board, AK wishes to point out the Europe-wide problem of the massive number of empty runs. The question arises as to why larger and longer lorries are needed when the number of empty runs is very high throughout Europe and continues to rise. Lorries travelling without freight pollute the environment and infrastructure with no benefit to the community. A Europe-wide regulation/reduction of empty runs would be an effective way of combatting the shortage of drivers and would also lead to a reduction in the high volume of lorries on Europe's motorways. That would also increase road safety. EU-wide regulation of empty runs would be financially more favourable and would have the same effect in terms of transport policy as the promotion of oversized lorries. The financial resources could be used more sensibly for sustainable projects.

Instead of decreasing, the proportion of empty lorry journeys in Austria alone has increased significantly over the past ten years, as a recent analysis by Verkehrsclub Österreich (VCÖ) based on Eurostat data shows. The percentage of kilometres driven empty has increased from 31 to 34 percent since 2010. Last year 926 million kilometres were covered by lorries in Austria without a load – 162 million kilometres more than in 2013. The high number and increase in empty runs is also a result of transport being too cheap.

The sharp increase in lorry traffic in Austria in recent years is a nuisance for many drivers and a health hazard for the population due to noise and exhaust pollution. There is a clear need for action here, both at national and European level. The proportion of empty runs must be reduced, whether through logistical measures or incentives for increased cooperation between companies in the EU area.

Under the Commission's current proposal, Member States may allow larger and heavier lorry combinations, as provided for in the annex to the proposed new directive. These vehicles could then also be used for cross-border freight transport if the neighbouring Member States also agree to the proposed new provissions. Even if Austria and other countries do not automatically permit these larger and heavier lorry combinations, it can be assumed that pressure from the haulage lobby, the Commission and other Member States would increase immensely.

Working conditions lead to „exodus" from the industry

These circumstances further increase the already existing pressure and strain on drivers during their work. Adherence to driving breaks and rest periods is already a challenge for drivers. Due to a lack of sufficiently available parking and rest areas, drivers already frequently spend their statutory breaks on the hard shoulder right next to the motorway. Larger vehicles mean even less space in rest areas.

On busy motorway sections, there is already the problem of kilometre-long, endless lines of lorries in the right-hand lane. That would be exacerbated by gigaliners. Dangerous situations such as cars or motorcycles moving into the right-hand lane to exit the motorway would increase.

Transport goals under the Green Deal

The primary goal of European transport policy under the Green Deal is to shift as much freight transport as possible from road to rail. The possibility of deploying gigaliners will inevitably lead to a further weakening of the competitiveness of rail freight transport. Even today, it has difficulty competing with road freight transport, both in terms of price and time. EU transport policy should therefore focus more on strengthening rail transport and the shift from road to rail freight. That is especially true along those transport corridors where rail infrastructure already exists or where new cross-border infrastructure is currently being built or planned.

This directive proposes to increase the maximum permissible weight for lorries powered by electricity and for lorries powered by synthetic fuels (e-fuels). Depending on the vehicle combination, that is up to four tonnes (equivalent to 10 percent of the total weight) more than for conventionally powered lorries. The legislator's

aim is compensate for the weight disadvantage of zero-emission vehicles caused by the battery. Whilst this preferential treatment is understandable because it makes road freight transport cleaner and greener, such exemptions will be almost impossible to reverse in the future, even once the use of zero-emission vehicles has become established. It should also be considered that lorries running on alternative fuels wear down the infrastructure even more than currently registered vehicles due to their potentially heavier weight.

More frequent checks and improved standards

AK never tires of reiterating its call for more checks and increased effectiveness of such checks – be it technical roadside inspections, which focus on the technical equipment and condition of the lorries, or inspections of compliance with labour and social regulations based on the mobility package, which are intended to ensure that driving and rest times are observed.

The draft directive in question stipulates that each Member State must carry out at least six vehicle checks per million vehicle kilometres. From Austria's point of view, as a classic transit country, this number of checks is far too low to act as an effective deterrent against evasion and abuse. The minimum number of checks should not be set per Member State, but rather based on existing transit corridors within Member States. This is the only way to ensure that effective checks are carried out where most lorries are on the road.

Contact us!

In Vienna:

Stefanie Pressinger
T +43 (0) 1 501 65 12818
stefanie.pressinger@akwien.at

In Brussels:

Florian Wukovitsch
T +32 (0) 2 230 62 54
florian.wukovitsch@akeuropa.eu

Austrian Federal Chamber of Labour
Prinz-Eugen-Straße 20-22
1040 Vienna, Austria
T +43 (0) 1 501 65-0

www.arbeiterkammer.at

AK EUROPA
Permanent Representation of Austria to the EU
Avenue de Cortenbergh 30
1040 Brussels, Belgium
T +32 (0) 2 230 62 54

www.akeuropa.eu

About us

The Austrian Federal Chamber of Labour (AK) is by law representing the interests of about 3.8 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore, the Austrian Federal Chamber of Labour is a part of the Austrian social partnership. The Austrian Federal Chamber of Labour is registered at the EU Transparency Register under the number 23869471911-54.

The main objectives of the 1991 established AK EUROPA Office in Brussels are the representation of AK vis-à-vis the European Institutions and interest groups, the monitoring of EU policies and to transfer relevant Information from Brussels to Austria, as well as to lobby the in Austria developed expertise and positions of the Austrian Federal Chamber of Labour in Brussels.