



Matthias Ruete
Director-General, DG Energy and Transport
European Commission
1049 Brussels

06/08/2008

RE: EIM position on the study on the effects of adapting the rules on weight and dimension of heavy commercial vehicles as established within Directive 96/53/EC (TREN/G3/318/2007)

Dear Mr Ruete,

EIM is disappointed by the presentation on 10 July of the outcome of the stakeholders' consultation and the results of the study carried out by the Consortium TM Leuven on the potential effects of allowing the circulation of Mega-Trucks on European roads.

In particular, we believe that a number of important factors have not been properly taken into account in the assessment of the effects of Longer and Heavier Vehicles. Moreover, EIM is not satisfied with the way the web questionnaire was set up as it seemed to be weighted in favour of the introduction of LHVs.

In this regard, EIM would like to stress the following points:

- **Web questionnaire.** The online questionnaire focused on the question of *how* LHVs should be introduced, rather than *whether* they should be introduced. Allowing mega-trucks was not presented as a possibility; rather it seemed to be taken for granted, with no alternatives suggested. The questions should have been better balanced, in order to enable the expression of concerns about safety, infrastructure and the environment. In this regard, it seems that Scenario 1 (business as usual) has not been taken into account in the questionnaire.

Moreover, EIM experienced many technical problems when filling in the questionnaire, which could have led to wrong answers being listed.

- **Limited options.** The following possible options were mentioned in the call for tender of the study:
 - 44 tonnes on six axles for general cargo or for carrying all types of Intermodal Loading Units (ILUs) in combined transport operations.
 - The use of 45 foot (13.72m) long containers in cross-border transport operations.
 - Introduction of harmonised loading dimensions such as the overhang for car transportation.

These options were not presented during the stakeholders meeting.

- **Low elasticity figure.** The TRANS-TOOLS model uses a too low figure (-0.416) for the road transport demand price elasticity, related to tonne-volume. This leads to a fall in truck-kilometres of up to 12.9% and a maximum average decrease of rail tonne-volume of up to 3.8% (Scenario 2). Thus, the expected modal shift from rail and inland waterways seems to be underestimated, whereas the reduction in heavy vehicles kilometres seems to be overestimated.

Moreover, using only one elasticity figure for different types of goods and different distances is questionable.

The elasticity of the TRANSTOOL model is related to tonne-volume and not tonne-km. The consultants from Sétra have also calculated the expected modal shift but they used an elasticity

related to tonne-km. This elasticity was set for road transport at -0.7 for short distances and -1.0 for long distances, related to tonne-kilometre. This already showed a higher decrease of rail market share of 6.0% in scenario 2. More importantly, this shows an increase of 5.1% in road transport tonne-km for scenario 2.

Based on the investigation carried out by the Netherlands Economic Institute and CE Delft for the Dutch transport ministry, EIM believes that levels of elasticity for tonne-volume between -0.6 and -0.9 would allow for a more realistic description of the possible consequences of LHV's introduction. For instance, in the case of a 20% price decrease of road freight transport, using the right elasticity would result in a 12-18% increase in road freight traffic and a 30-60% decrease in rail freight traffic.

- **The “corridor” scenario.** Scenario 3 analysed the effects of allowing 25.25m and 60t LHVs in countries forming a corridor (the Netherlands, Belgium, Germany, Sweden, Finland and Denmark). However, it is up to the Member States to approve the Commission proposal. Germany has already taken a strong position against Gigaliners, at federal level. Besides this scenario is not in line with the rules of the internal market as it would lead to discrimination between hauliers and shippers on the corridor and those outside of the corridor.
- **Safety.** The study results indicate that individual LHVs are less safe than normal trucks, but the authors argues that safety will improve because they foresee less truck-km in general, and therefore a decreased risk of accidents. This seems to be a very dangerous assumption - if truck-km do not decrease, but increase or even stay at the same level, this would mean an overall deterioration in road safety.

The proposed counter-measures to increase the safety of LHVs (stability control systems, special driver education) could also be introduced for normal trucks, in which case LHV traffic would be even less safe as compared to normal trucks.

The analysis should also take into account that rail is safer than road: therefore calculations should include the exposure to more road accidents due to modal shift from rail to road.

Considering the objective of halving the number of deaths on European roads by 2010, it would give out a wrong political signal to allow unsafe vehicles to circulate in Europe.

- **Infrastructure.** According to the study, a total of € 23-46 billion for EU25 would be needed to adapt bridges to LHVs. Maintenance costs could increase by up to 10.29% (Scenario 4, five axles). Surprisingly, no mention is made of the additional infrastructure investments required in order to adapt:
 - Tunnels
 - Entry/exit ramps
 - Crash barriers
 - Parking spaces/Rest areas
 - Intersections
 - Roundabouts
 - Railway level crossings.

A more detailed assessment of the costs related to these issues would lead to a different result in the final cost-benefits analysis.

- **Environment.** Although LHVs are 9% less efficient per vehicle/km, the too low elasticity figure and the decrease in vehicle/km lead to a positive result in terms of greenhouse gas emissions. As this assumption is rather questionable, the admission of Mega-Trucks on European roads would be against the precautionary principle.



- **External costs.** In the cost-benefits analysis, no mention is made of the expected external costs created by the introduction of Mega-Trucks. Even assuming the low elasticity of -0.416, additional external costs would be expected, related to:
 - Noise
 - Accidents.

Much higher transfers from rail and inland waterways to road would increase external costs related to:

- Climate change
- Air pollution
- Congestion

This lack is rather surprising, at a time when the Greening Transport Package recently published by the European Commission explicitly aims at internalising external costs in all transport modes.

Internalisation is already possible for rail transport through infrastructure charges in accordance with Directive 2001/14/EC. As long as the full internalisation of all road transport external costs is not allowed, any initiative making road transport more attractive creates further imbalances between transport modes in the freight market.

For all the reasons outlined above, EIM believes that a revision of the study is necessary, with a proper analysis of all these important issues. A more complete consultation procedure and study would definitely lead to a different conclusion than *“freight transport with LHVs allowed will be generally better for society”*.

At this stage of the discussion, the question should not be *how* Mega-Trucks are to be introduced, rather *if* they are worth introducing. EIM's answer to this question is definitely: no!

Yours sincerely,

A handwritten signature in black ink that reads 'Michael Robson'.

Michael Robson
Secretary General EIM
European Rail Infrastructure Managers