

An Alpine viewpoint to the proposals for amending the Directive on Weights & Dimensions and the Combined Transport Directive

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1. Background: Modal shift and transition to alternative technologies as major rationales for iMONITRAF!

Freight transport needs to catch up on climate action to meet the ambitious reduction targets agreed at EU and national level. In the Alps, the need for action is especially high as Alpine regions are, on the one hand, over-proportionally affected by climate change and, on the other hand, are themselves large emitters with rising traffic volumes on the Alpine corridors.

Modal shift from road to rail is the main rationale of the Alpine regions that have joined forces in the frame of iMONITRAF!. Low, and increasingly zero-carbon, rail is the existing green mode for freight transport and the Alpine countries, together with the EU, are investing large sums into improving the relevant infrastructures. **Decarbonisation of the remaining road transport fleet** is the second pillar of our strategic approach, recognising the benefits of zero emission vehicles for the sensitive Alpine environment.

→ *We thus welcome the general objectives of the EU Smart and Sustainable Mobility Strategy to improve the level-playing-field for rail transport and to set incentives for decarbonising the road transport fleet.*

→ *The proposed amendments of both the Weights & Dimensions Directive (WDD) and the Combined Transport (CT) Directive should contribute to reaching the ambitious modal shift targets as embedded in the EU Green Deal. An ambitious and integrated approach for both proposals is needed to use their full potential.*

→ *All Measures that bear a risk of a reverse modal shift thus must be rejected.*

→ *The Weight & Dimensions Directive should consider the particular context of the alpine regions and their infrastructures, which includes viaducts and bridges and take it into account in its measures.*

2. What we support in the two proposals:

Proposal for CT Directive and provisions for intermodal transport within WDD are in line with our ambitions to strengthen modal shift

→ **but potentials for improvement on the policy framework elements!**

On the Alpine corridors, combined transport (CT) has become the most important rail services, the share of conventional rail freight is decreasing (block train and single wagonload

transport).¹ We thus welcome the efforts of the European Commission to strengthen CT with the amended CT Directive. However, the current proposal leaves some questions unanswered.

2.1. Combined Transport Directive

- Definition of Combined Transport (Article 1c): in general, we welcome the new approach for defining a CT operation that puts external costs in the focus. This science-based approach seems a big step forward compared to the existing situation. However, many questions regarding the operationalisation of this approach remain open and need to be defined in more detail to allow a detailed assessment regarding the modal shift impacts.
 - 👍 The broad approach for defining external costs as considered in the COM proposal is crucial in this respect, including congestion costs (in addition to all environmental cost elements).
 - 👎 Specification needed to ensure a strong modal shift impact: more details on the proposed intermodal transport calculator need to be made available before a final position on the CT Directive is possible. From our viewpoint, waterways and rail should be treated differently in this calculator. Also, we see the need to consider unwanted effects, e.g. enabling unwanted long road legs if the rail part of the journey is very long or unwanted effects regarding the uptake of zero-emission HGV.
 - 👎 Clarification needed: As the external cost calculator shall be based on the EU Handbook of external costs, we call for an inclusion of “mountain factors” into the calculator to consider the over-proportional external costs in mountain areas.
*→ Include a **“mountain factor”** in the cost calculator for air quality and noise (a factor 4 according to state-of-the-art analysis, a factor 2 as minimum requirement).²*
- National policy frameworks/ Support measures (Art. 3a): we welcome the general approach of the policy frameworks, they support our objective to better coordinate policy measures across and between the Alpine transit corridors and to develop a stronger and more transparent incentive for modal shift.
 - 👍 The 10% cost reduction target as common benchmark is an important step into the right direction. Especially on the Alpine corridors, this would lead to a considerable competitive advantage for CT as currently the costs on major relations are already at a point where CT becomes competitive.³ However, there is a lack of clear guidelines and options for the Member States to achieve this goal.
 - 👍 Toolbox: The proposal for a common toolbox would lead to a certain amount of harmonisation, but the current status of the proposal does not allow an assessment.

¹ European Commission and Swiss Federal Office for Transport (2023): Observation et analyse des flux de transports de marchandises transalpins, Rapport annuel 2021 ; <https://www.bav.admin.ch/bav/de/home/verkehrsmittel/eisenbahn/quieterverkehr/verlagerung/berichte-und-zahlen.html>

² Infras and Herry Consult (2018): External costs in mountain areas: <http://82.149.35.127/publications/external-costs-mountain-areas>

³ European Commission and Swiss Federal Office for Transport (2023): Observation et analyse des flux de transports de marchandises transalpins, Rapport annuel 2021 ; see above.

- ☞ But: Leaving the design and implementation of support measures up to the Member States will maintain the present fragmented and incoherent framework potentially impacted by conflicting conditions for cross-border services.

→ the provisions in the new Directive should call for a stronger coordination and harmonisation of policy measures, especially on the TEN-T corridors to make full use of the new rail infrastructures.

→ if possible, the policy frameworks should be implemented in a broader freight transport strategy, also linking the policy framework to infrastructure development for CT as foreseen in the new TEN-T regulation.

2.2 Provisions on intermodal transport in WDD

To strengthen this approach of the CT Directive and the cost-reduction target, we also support the provisions on intermodal transport as provided in the proposal for the WDD:

- ☞ To strengthen our existing support for CT, we agree to broaden the scope of specific provisions for road legs of intermodal operations (e.g. to allow a higher weight limit also for non-containerised intermodal transport) - but they should be limited to 44t maximum weight especially in the alpine regions because of the sensible infrastructure with its bridges and viaducts.

- ☞ New proposals to change dimensions for intermodal transport need to be reviewed critically, as there are already existing solutions in place to accommodate e.g. high-cube containers in intermodal solutions.

→ Avoid any extension of dimensions beyond the profile of the p400 loading gauge which would not be feasible to integrate in intermodal solutions on the Alpine corridors.

3. What we see critical in the new proposals: an increase in weights & dimensions for HGV in general, for zero-emission HGV (beyond actual battery weight) & further extension of the European Modular System

→ WDD must not counteract efforts to boost modal shift from road to rail!

3.1 Proposal in CT Directive on driving bans

iMONITRAF! and its partner regions are deeply committed to the AVOID-SHIFT-IMPROVE approach. All regions have implemented ambitious modal shift policies. Yet, other policy objectives also play an important role – especially the improvement of air quality which is still a high concern in the Alpine valleys.

- ☞ iMONITRAF! and its partner regions are contrary to a generalised EU-wide exemption from driving bans for the road leg of CT. It is believed the provision of driving bans (such as weekend and holiday bans) is sole competence of the Member States. Driving bans in single MS reflect national (and sometimes regional)

needs. They fulfil the aim to guarantee the fluidity and security of traffic and other aims in line with national and EU provisions.

→ *We propose to delete Article 9a.*

3.2 Provisions with the risk of reverse modal shift in WDD

We take a careful look at all measures that, on the one hand, can contribute to the decarbonisation of the vehicle fleet but, on the other hand, have potential negative effects for rail transport. In this respect, we see a great risk in several proposals of the WDD to lead to **reverse modal shift** – which is assessed to amount to 21% of rail freight transport to be shifted back to road.⁴

👉 European Modular System , Article 4a (Amendment 3): with its proposal, the Commission aims at enabling a cross-border circulation of European Modular System (= “Gigaliners”). This leads to the effect that these long and heavy vehicle combinations can be used in long-distance and cross-border transportation, a segment with a high rail-affinity. On the Alpine corridors, gigaliners would also put a considerable additional strain on the mountainous road infrastructures and lead to additional safety risks.

→ *EMS are not suitable for the sensible alpine areas and should therefore be excluded from cross and intra alpine transport. Also, we criticize that the proposal on Gigaliners does not include any zero-emission signals nor safety considerations.*

👉 Cross-border transport for 44 t trucks, Article 4b (Amendment 3): In this article, the Commission aims at simplifying cross-border transportation with HGV complying to the 44t weight limit which is already allowed in some Member States (including France, Italy and the BeNeLux countries). Those Member States that allow 44t HGV internally shall also allow HGV from other countries to cross their borders.

→ *This would lead to a capacity increase and thus competitive advantage for road transport and makes the additional weight limit proposed for zero-emission HGV practically obsolete (see below). We thus propose to delete Article 4b.*

👉 Provisions for zero-emission HGV, Article 10b (Amendment 9): Subsidies and support for zero-emission HGV are needed to accelerate the transition to a decarbonised HGV fleet. The iMONITRAF! regions already have many measures in place. However, once the technologies are well mature and cost-competitive, advantages for zero emission vehicles need to be scaled back to be in line with the Avoid-Shift-Improve logic.

→ *We propose to limit the additional weight limit for zero-emission trucks to the de-facto extra weight that comes along with zero-emission technologies instead of providing a “flat-rate” provision of 4t extra weight (as provided in the manufacturers’ documentation, in line with the proposal for alternatively fuelled vehicles).*

→ Modal shift should be at the heart of the Greening Freight package. The WDD should not become another regulatory provision for governing road transport that undermines and

⁴ Study on Weights and Dimensions. Impacts of the Proposed Amendments to the Weights and Dimensions Directive on Combined Transport and Rail Freight Transport. D-fine GmbH. [Link](#).

counteracts efforts to shift to rail, as the European Court of Auditors criticised in its *Special report on intermodal freight transport*.⁵

→ The WDD and the CT Directive should go hand-in-hand and not cannibalise each other. Their interfaces should be assessed more in-depth and considered throughout the proposals.

→ **We call on decision makers at European level to review these new provisions for weights and dimensions as included in the proposal of the European Commission. The Weights & Dimensions Directive should be fully in line with the objectives of the EU Smart & Sustainable Mobility Strategy which foresees a doubling of rail freight transport and the creation of a level-playing-field for intermodal transport until 2030.**

⁵ See: https://www.eca.europa.eu/Lists/ECADocuments/SR-2023-08/SR-2023-08_EN.pdf, page 5