

February 2d, 2022

ASECAP Feedback to the EC Consultation on Directive proposal « Weight and dimensions »

ASECAP, European Association of toll motorways, tunnels and bridges operators and their members toll road infrastructure Companies welcome the initiative of codification of the provisions on maximum weight and dimensions in traffic but would like to make some observations and comments.

The ASECAP and its members think that this proposal for a Directive should be limited to codification work. This proposal should therefore not make any changes as regards provisions relating to the maximum weight and the dimensions of heavy goods vehicles.

An increase in the maximum weight and the dimensions of heavy goods vehicles would have a direct and significant impact on the infrastructure of the motorway network and may have also impact on road safety. Motorway built in Europe are designed to meet the existing standards of weights and dimension. They are not designed for longer and heavier vehicles. The basis for national and European regulations and therefore also for the infrastructure planning and building is Directive 96/53/EC which sets out the maximum allowable vehicle loading dimensions in national and international road transport in the EU.

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 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 passage of stresses at high sized limits, lead to potential long-term degradation that is difficult to estimate.
2. Negative effect 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 dimension also increasing high risk of fires (proportionally to the cargo which is carried). This requires massive structural changes to the tunnel not sized for mega truck. The safety installations and the estimation of the potential for danger would thus have to be completely reassessed.

3. 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.
4. The psychological impact to light vehicles' drivers behavior should not be underestimated.
5. Access/capacity limit to rest areas and parking lots: as it is mandatory to conform to 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.
6. 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.

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 shouldering their responsibility as mobility providers linking inter-urban and metropolitan areas, playing a major role by moving people for their daily trips to go to work, school, hospital....

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