



To:

Committee on Transport and Tourism of the European Parliament

Schaan, 7 February 2024

Subject: CIPRA position on the revision of Directive 96/53/EC – Weights and dimensions of road vehicles

So-called gigaliners threaten the Alpine region

Dear Sir or Madam,

We urge you as member of the TRAN Committee of the European Parliament to thoroughly scrutinize the proposals of the EU Commission and unequivocally reject them. There are environmental, economic and safety aspects that speak against the authorisation of these gigaliners.

For many years, the International Commission for the Protection of the Alps CIPRA with its national and regional representations and its 100 member organisations, has been strongly committed to protection and sustainability in the Alps. In particular, we strive to support and promote solution measures to reduce the major problems caused by transalpine freight traffic to the population, environment and climate in the sensitive Alpine region in the centre of Europe. The Alpine Convention and its Transport Protocol are legally binding for all Signatory Parties: the EU and the Alpine States.

Now, the European Commission is once again considering the approval across Europe of oversize trucks with a length up to 25.25 m and a maximum permissible weight up to 60 t, commonly referred to as gigaliners or mega trucks. Member States that allow gigaliners on their territory will be able to use them for cross-border operations between neighbouring Member States without the need for a bilateral agreement and without being restricted to crossing just one border. Anyone following the political dynamics will quickly realise that Europe is opening a Pandora's box. Voices are already clamouring for more. Nordic logistics companies want to allow gigaliners on the entire trans-European transport network. They see the Commission's proposal as a first step in this direction.

The Commission, as part of the "Greening Freight Package," aims to convey the idea that mega trucks contribute to climate protection and offer a solution to traffic issues. However, the reality is quite the opposite: oversize and excessively heavy trucks have negative effects on the climate, pose safety risks, and are economically burdensome.

Mega trucks come with significant drawbacks in the following areas:

- **Alpine and climate protection:** Mega trucks are expected to harm the Alpine region and escalate CO₂ emissions as the transport costs per tonne decrease. This will result in a reverse modal shift from environmentally friendly rail freight to road transport up to 21% on average for all rail segments and 16% for Combined Transport. This results in up to 10.5 million additional truck journeys per year, 6.6 million tonnes of additional CO₂ emissions and a tripling of external costs, promoting additional transportation.¹ The population as well as the environment in the Alpine region, which already must put up with significant traffic, will suffer from the additional lorry traffic crossing the Alps.
- **Safety:** Overtaking mega trucks takes longer, and they pose a greater risk to other road users than standard trucks in turning, at intersections, in roundabouts, and at motorway junctions. Longer clearance times at level crossings add an extra safety risk. Additionally, the severity of consequences in case of an accident increases with the weight of the truck. All these factors apply even more in the Alpine region with the steep inclines and winding roads. As the Alpine transit routes also run alongside and over countless villages and watercourses, every gigaliner also poses an additional threat to people and natural resources.
- **Infrastructure cost:** Large trucks will impose significant costs on European taxpayers. Intersections, roundabouts, emergency lay-bys in tunnels, and truck parking areas will require modifications. Maintenance costs will rise due to the increased wear and tear caused by the weight of these giant trucks to bridges and roads. Paradoxically, they make on the one hand freight transport cheaper, but on the other hand they lead to an increase in truck journeys and substantially and permanently rising costs for the public purse.

It is evident that longer and heavier trucks will exacerbate challenges in Alpine and climate protection, road safety, and infrastructure maintenance. Advocates for mega trucks prioritize economic and operational advantages for logistics companies, for mega truck manufacturers or for customers with lower logistics unit costs at the expense of society and environment, masquerading under the guise of reducing greenhouse gases.

However, it is important to point out that the air quality in the Alps is already suffering from traffic and that the noise and pollutants in the narrow transit valleys cannot dissipate. You can find detailed data in the scientifically-based **Report on the State of the Alps No. 8, which analyses air quality throughout the Alps** in 2021. It is published in all 4 Alpine languages – French, German, Italian and Slovene - and in English.² Its recommendation no. 5 states the following:

“Promote the use of smart traffic management, e.g., speed limits, road pricing, favouring clean vehicles on Alpine motorways and tunnels to lower emissions, as well as:

- encourage the implementation of alternative transport technologies and combined transport;
- integrate public transport in multimodal mobility systems;

¹ 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](#).

² www.alpconv.org/en/home/news-publications/publications-multimedia/detail/rsa-8-air-quality-in-the-alps/

- incentivise modal shift of passenger and freight transport.”

The ongoing operations and test drives of gigaliners in some Member States represent a gradual approval through the back door, undermining uniform rules and the European single market in practice.

Please prevent the Commission from torpedoing Alpine protection and undermining its own Green Deal objectives with this proposal.

This is necessary so that Alpine transit traffic can serve European climate protection as a whole and thus the well-being of the people in the Alpine region. The people here are extremely affected by transit traffic and the climate crisis. On the contrary, strengthening the shift to rail transport is relevant for all European residents and is good for their health and quality of life, thus reducing healthcare costs and the stress on the healthcare system.

We remain at your disposal for any questions and further discussion.

Best regards,



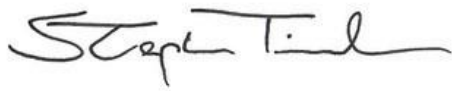
Serena Arduino

President CIPRA International



Kaspar Schuler

Director CIPRA International



Stephan Tischler
President, CIPRA Austria



Gilles Chappaz
President, CIPRA France



Axel Doering
President, CIPRA Germany



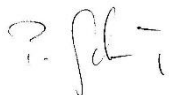
Vanda Bonardo
President, CIPRA Italy



Matej Ogrin
President, CIPRA Slovenia



Josef Oberhofer
President, CIPRA South Tyrol



Patrik Schönenberger
President, CIPRA Switzerland