

Eurogas position on the Weights and Dimensions Directive

Eurogas welcomes the Commission's proposal to review the Weights and Dimensions Directive (WDD), which sets out the maximum weights and dimensions for heavy-duty vehicles (HDVs) to circulate on EU roads. This Directive aims at improving the environmental performance of such vehicles while ensuring fair competition among road transport operators. Commercial vehicles fuelled with biomethane (bio-LNG/bio-CNG) or hydrogen play a key role in the decarbonisation of road transport, alongside battery-electric vehicles. Eurogas firmly believes that the upcoming Directive should ensure a level playing field between technologies with lower GHG footprints while considering the specific requirements of alternatively fuelled and zero-emission vehicles.

Recommendations

- The revision should maintain the existing definition of **'alternative fuels'** encompassing fuels with GHG emission reduction potential in comparison to diesel and of **'alternatively fuelled vehicles'** which require additional weights to accommodate their alternative powertrains.
- The revision should apply the **additional weights derogations** uniformly for alternatively fuelled and zero-emission vehicles, capping the weights derogation at the incremental weights of the relevant powertrains or enabling alternatively fuelled vehicles to carry additional payload as well as ZEVs.
- The revision must ensure that Member States can allow **weight derogations for cross-border traffic** in line with the expected evolution of the commercial vehicle fleet deriving from the CO₂ standards for heavy-duty vehicles (Regulation (EU) 2019/1242).

Capturing the benefits of alternative fuels

The WDD defines 'alternative fuels' as "fuels or power sources which serve, at least partly, as a substitute for fossil oil sources in the energy supply to transport [...]". Eurogas welcomes the Commission's definition of alternative fuels. This definition encompasses gaseous fuels such as natural gas, hydrogen and biomethane which offer significant GHG emission reduction potential compared to diesel. What's more, biomethane and hydrogen have the potential to achieve negative levels of GHG emissions from a well-to-wheel perspective¹.

This definition also lays the ground for the definition of 'alternatively fuelled vehicles' and the associated weights and dimensions derogations. The decarbonisation potential of vehicles fuelled with a blend of conventional and renewable or low-carbon fuels as well as dual-propulsion vehicles should be recognised, in line with the 'alternative fuels' definition. Therefore, Eurogas recommends maintaining the existing definition of 'alternatively fuelled vehicles' including vehicles fuelled *wholly or in part* by an alternative fuel. A more restrictive definition would affect the circulation of vehicles already decarbonising the European HDV transport sector today, and thus, could have adverse effect on the decarbonisation of the transport industry.

The EU HDV sector is currently dominated by diesel, which represents more than 96% of the vehicles in use². Vehicles fuelled with natural gas, including biomethane, represent the largest share of alternatively fuelled trucks and buses currently on EU roads³. Additionally, these vehicles benefit from a developed and

¹ Joint Research Centre, [JEC well-to-wheels report v5](#), 2020, p.29.

² European Commission, [European Alternative Fuels Observatory](#), 2024.

³ ACEA, [Vehicles in use Europe](#), 2023.

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growing infrastructure, with more than 4000 CNG refuelling stations and 700 LNG refuelling stations⁴ across Europe and renewed targets for liquified methane refuelling stations implemented by the Regulation for the Deployment of Alternative Fuels Infrastructure (Regulation (EU) 2023/1804). The revision of the WDD should therefore support these alternatively powered vehicles in realising their decarbonisation potential.

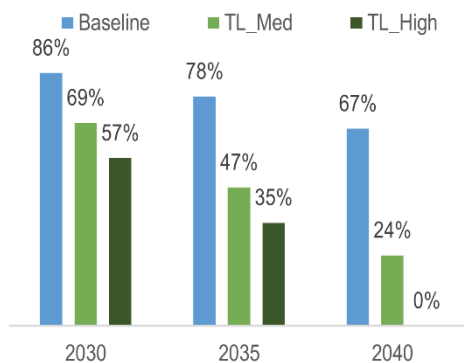
Maintaining a level playing field between decarbonisation alternatives

The WDD sets out the derogations from the maximum weights and dimensions of alternatively fuelled and zero-emission HDVs. In 2019, alternatively fuelled vehicles were allowed 1 additional tonne in some cases, while zero-emission vehicles were allowed 2 additional tonnes to accommodate their powertrains including batteries and fuel stacks. With this revision, the Commission proposes to allow an additional 4 tonnes for ZEVs that will compensate for the weight of the zero-emission technology while also enabling to carry an extra payload once the technologies become lighter. The additional weight derogations for alternatively fuelled vehicles are however limited to the declared incremental weight of the technology.

Enabling additional weight for the vehicle technologies is necessary to contribute to the deployment of ZEVs, especially those travelling longer distances with heavy payloads. However, this measure should not unfairly hinder the competitiveness of alternatively fuelled vehicles. Consequently, Eurogas suggests applying weight derogations up to the declared incremental technology weight for both ZEVs and alternatively fuelled vehicles, or up the maximum derogated weights as specified in Annex I paragraphs 2.2, 2.3 and 2.4 for both technologies, enabling them to carry heavier payloads over time. Considering the GHG emission reduction potential of HDVs running on biomethane and hydrogen internal combustion engines, the uptake of these vehicles should be incentivized as well as ZEVs.

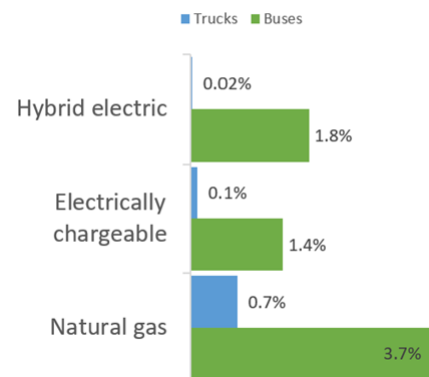
Harmonising cross-border operations in line with the evolution of the vehicles in use

The revision of the WDD suggests harmonising cross border operations across the EU by enabling a 44 tonnes gross weight allowance for cross-border traffic or more in the case of intermodal transport operations. However, setting the expiration date of this allowance to 31 December 2034 would de facto result in phasing-out cross-border operation with heavier vehicles not qualifying as ZEVs, and therefore negatively impact alternatively fuelled vehicles. On top of preventing increased energy efficiency of



Share of new internal combustion engines vehicles

Share of alternatively-powered vehicles in EU fleet, 2021



transport operations, with less trucks carrying more payload, this phase-out is not aligned with the underlying projections of the CO₂ standards for heavy-duty vehicles currently under review. Indeed, according to the Commission's impact assessment on this file, an objective of 60% CO₂ emission reduction by 2035 ('TL_Med scenario') would still translate into 47% of new internal combustion engine vehicle registrations, which would be added to the ICE-dominated existing fleet. Therefore, Eurogas advocates for a review of the phase-out date in line with the development of the European HDV fleet.

⁴ NGVA Europe, [Stations Map](#), 2024.