

Brussels, 18 December 2023

## **Open Letter raising concern on the risk of inconsistencies in revision of Weights and Dimensions Directive**

Dear Ministers of the EU Member States,  
Dear Members of the European Parliament,  
Dear Commissioner for Transport Ms. Adina Vălean,

We welcome the fast progress the co-legislators are making on the Weights and Dimensions Directive, which represents an important piece of legislation for the deployment of zero-emission hydrogen powered heavy-duty vehicle (HDVs) fleets.

We would like to express our deep concern regarding the risk that the Directive may not include any increase in the **maximum drive axle weight limit** of zero-emission HDVs, **thereby effectively hampering the uptake of hydrogen-powered HDVs in the European market.**

Hydrogen powered trucks will play a pivotal role in achieving our road transport decarbonisation objectives. We recently [estimated](#) that there will be no less than 50.000 hydrogen powered vehicles in operation by 2030. In the meantime, **we are worried that the current state of negotiations would in practice make it impossible for hydrogen HDVs to comply with maximum drive axle weight limit without compromising on payload.** Running more, half empty clean trucks would clearly contradict - the spirit of the Weights and Dimensions Directive - whose goal is to support the uptake of zero-emission hydrogen HDVs - and would also be inconsistent with the European Green Deal and climate neutrality goals. **Therefore, we call on you to raise the maximum drive axle weight limit by one tonne. This would be the consistent adjustment to higher total weight allowances for hydrogen powered vehicles.** Lacking this, logistic companies would have no other choice but to run diesel fuelled trucks as long as possible, meaning that fossil fuelled vehicles would benefit from an unfair advantage.

Hydrogen powered buses are becoming an interesting solution for the use of clean hydrogen in public transport as we see the first fleets being deployed in European cities. Those vehicles, especially three-axle articulated configurations, also face the same issue: without the maximum drive axle weight limit adjustment they will have to compromise on passenger capacity creating issues for public transport operators and again giving advantage to their diesel competitors. **Therefore, an adjustment of one more tonne for the maximum drive axle weight of zero-emission hydrogen powered 3-axle articulated buses is needed.**

**We urge you to use the review of the Weights and Dimensions Directive to ensure zero-emission HDVs are sufficiently incentivised; a quick progress towards a final common position is of crucial importance for the industry.** By stimulating their market demand and promoting their uptake, you will contribute to the transition towards a more sustainable transport sector in Europe. Your leadership in this regard will undoubtedly play a pivotal role in advancing the European Union's commitment under the Green Deal to achieve climate neutrality by 2050.

We appreciate your attention to this matter and look forward to your support in supporting the uptake of zero-emission hydrogen solutions for trucks and buses.

Yours sincerely,