July 31, 2023

Comment

on the draft text for the Swedish Transport Agency's regulations on technical requirements for vehicle trains with a length over 25.25 meters

Reference number 2023/0220/S (Sweden)
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Introduction

A government decision in August 2022 introduces a new provision in the Traffic Ordinance, Chapter 4, Section 17 f, on August 31, 2023. The provision authorises the Swedish Transport Administration and the municipal road managers to prescribe that on a certain road, part of a road or stretch of road, the length of a vehicle train may not exceed 34.5 metres. The provision and its conditions are linked to the European Modular System (EMS).

The draft text by The Swedish Transport Agency includes proposals for technical requirements for vehicle trains with a length over 25.25 meters as well as consequential changes in the Swedish Transport Agency's regulations and and general guidelines (TSFS 2018:40) on technical requirements for vehicle trains with a gross weight over 64 tons, and that the Swedish Road Administration's regulations (VVFS 2008:261) on equipment that shall not be included in the vehicle width and vehicle length shall be replaced by new Transport Agency regulations (TSFS) with essentially the same content.

As a global trailer manufacturer, we welcome the efforts made by the Swedish government and its authorities to introduce a new provision that will pave the way for longer vehicle trains. Based on our experiences with longer vehicle trains in Finland, Spain and the Netherlands, there is a large potential to contribute to the overall aim of reducing CO2-emissions in transport.

Market perspective

From a market perspective, there is uncertainty regarding the adaptability of existing A-double combinations within the Finnish market under the current legal framework. The divergence between the Swedish framework and the Finnish A-double regulation may have a negative impact on the market, resulting in a lack of standardization. Consequently, cross-border transportation between Finland and Sweden may be problematic, as one of the two national regulations does not entirely permit the other national A-double combination.

The framework for designing the first semi-trailer is significantly different from the "European standard" semi-trailer design, such as having a wheelbase of 6.4 meters. Although the second semi-trailer does not have specific requirements, it does not make sense from a customer’s perspective in international and cross-border transport to enter this market if the first trailer is not fully compatible with the rest of Europe.

Specially designed trailers have a lower residual value and are mainly applicable in the domestic market, which increases the barrier to participate in A-double combinations from a customer's perspective.

The current regulatory framework does not adequately consider common European trailer solutions concerning standard dimensions. The absence of a concept of a combination with 2-axle trucks diminishes the benefit and interest of international customers.

Therefore, we would welcome considering our proposal for amendments in the further process of the proposal on technical requirements for vehicle trains with a length over 25.25 meters to increase harmonisation across countries and to ensure a level playing field among market participants.

Proposal for Amendments

Please see the annex to this document “Proposal for amendments” for further details.

Contact

In case of any questions, please do not hesitate to contact us.

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Regulations on technical requirements for road trains – PROPOSAL FOR AMENDMENTS

Section 6	
Text proposed by the Commission	*Amendment*
If the total gross weight of the road train exceeds 64 tonnes, the heavy duty vehicle shall have at least **two driving axles and** an engine power of at least 310 kW.	If the total gross weight of the road train exceeds 64 tonnes, the heavy duty vehicle shall have at least an engine power of at least 310 kW.
Justification: Past trial tests (e.g., Spain, Scania Sweden) have shown that even gross weights up to 70t are towable by heavy duty vehicles with two axles (one driving axle).	

Section 12	
Text proposed by the Commission	*Amendment*
The heavy-duty vehicle must have at least three axles. The trailers included in the road train shall have at least two axles.	The heavy-duty vehicle must have at least **two** axles. The trailers included in the road train shall have at least two axles.
Justification: Past trial tests (e.g., Spain, Scania Sweden) have shown that even gross weights up to 70t are towable by heavy duty vehicles with two axles (one driving axle).	

Section 14	
Text proposed by the Commission	*Amendment*
If the front semi-trailer has two axles, the distance between the front coupling device and the centre of the first axle shall be at least 7.7 metres. If the front semi-trailer has three axles, the distance between the front coupling device and the centre of the first axle shall be at least 7.0 metres.	If the front semi-trailer has two axles, the distance between the front coupling device and the centre of the first axle shall be at least 7.7 metres. If the front semi-trailer has three axles, the distance between the front coupling device and the centre of the first axle shall be at least **6.79** metres.
Justification: The current framework does not totally cover the stability rules of Finland (Ra Yaw >1,9). Also, the current Finnish A-double concept allowed a distance between the front coupling device and the first axle of the semi-trailer at least 6.79 meters; based on (EU) 2019/1892 reference wheelbase RWB*. $RWB \leq [(12{,}50 - 2{,}04)^2 - (5{,}30 + \frac{1}{2} W)^2]^{0{,}5} = 8{,}135$** *) distance between the front coupling device and the centre of unsteered axle group. **) *if W=2,55; insulated trailers W=2,6* With mentioned requirements for dimensions, the first semi-trailer cannot be used in intermodal train transport. Due to the uncommon wheelbase and axle distribution, there is no larger number of applicable waggons existing. In contrast, by considering a concept with two European-type trailers, both parts can be used in intermodal (rail) transport (see for example Spain).	

Regulations on technical requirements for road trains – PROPOSAL FOR AMENDMENTS

Section 15	
Text proposed by the Commission	*Amendment*
The distance between the last axle and the rear coupling device of the front semi-trailer shall not exceed 1.4 metres.	The distance between the last axle and the rear coupling device of the front semi-trailer shall not exceed **1.6** metres.
Justification: Past trial tests (e.g., Spain, Scania Sweden) and experiences from 25.25 meters combinations (semi-trailer and central-axle-trailer) has shown that even distances between the last axle of the semi-trailer and the rear coupling device up to 1.6 meters have no negative influence on the stability of the whole train.	

Section [To be inserted]	
Text proposed by the Commission	*Amendment*
./.	**A road train *A-double* must be able to turn in a 120° swept circle having an outer radius of 12.5 metres and an inner radius of 2.0 metres.**
Justification: Turning circle is not described precisely in terms of turning degree. Finnish regulation considers a turning of 120°.	