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LIMITE

TRANS

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
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Subject:	Proposal for a Directive of the European Parliament and of the Council amending Council Directive 96/53/EC laying down for certain road vehicles circulating within the Community the maximum authorised dimensions in national and international traffic and the maximum authorised weights in international traffic - Presidency compromise proposal = Comments from Sweden

Delegations will find, attached, comments from Sweden on the above-mentioned document.

WK 12414/2025 ADD 1

LIMITE

EN

Written comments by Sweden regarding revision of directive 96/53/EG on weights and dimensions

Article 1, paragraph 3

Text of the current directive	SE proposal
3. This Directive shall not apply to articulated buses comprising more than one articulated section.	3. This directive shall not apply to articulated buses comprising more than one articulated section, <i>to vehicle combinations consisting of a motor vehicle with an attached trailer intended for passenger transport or to vehicle combinations consisting of a motor vehicle with an attached semi-trailer intended for passenger transport.</i>

Justification:

During the Spanish presidency, the Council Working Group agreed to add this text. SE would like to re-introduce these wordings in the compromise as it has not been controversial in the previous negotiations. Sweden understands that this might be a mistake.

Article 4 paragraph 4 (a)

Text of the current directive	SE proposal
(a) the transport operations are carried out in a Member State's territory by specialized vehicles or specialized vehicle combinations in circumstances in which they are not normally carried out by vehicles from other Member States, e.g. operations linked to logging and the forestry industry;	(a) the transport operations are carried out in a Member State's territory by specialized vehicles or specialized vehicle combinations in circumstances in which they are not normally carried out by vehicles from other Member States, e.g. operations linked to logging and the forestry industry <i>or local transport with buses</i> ;

Justification:

The directive should not limit individual MS possibilities to allow longer buses based on national conditions in order to have effective and sustainable public transports. During the Spanish presidency, the Council Working Group agreed to add this text. SE would like to re-introduce these wordings in the compromise as it has not been controversial in the previous negotiations. Sweden understands that this might be a mistake.

Article 10d, paragraph 1 and 1a

The amendments to Article 10d state that on-board weighing (OBW) will continue to be an alternative to weighing equipment in the infrastructure. SE cannot support the proposal that OBW systems should be implemented together with the tachograph.

SE would like to receive an explanation of what is meant by the addition in the proposed point 1a, what its purpose is and an assessment of whether it benefits or disadvantages a transition to more zero-emission vehicles:

“Vehicles equipped with on-board mass weighing equipment compliant with Regulation 2019/1213 and registered for the first time from 1 December 2029 shall transmit the total weight determined by on-board mass weighing equipment by remote communication via the tachograph in order to be eligible for the additional weight granted in points 2.2.1 and 2.2.2 of Annex I to zero-emission vehicles.”

Justification:

SE cannot support the proposal that OBW systems should be implemented together with the tachograph as experience shows that the regulation of the tachograph is complicated.

The purpose of the tachograph is to record information on driving and rest times. The introduction of the latest version of the tachograph (smart, version 2) is associated with extensive problems. This has a major negative impact on the entire transport industry and the reliability of the tachograph system as such. SE cannot see a reason to make a different assessment than previously regarding the integration of OBW systems with the tachograph. No new description of how the conditions have changed has been presented. Although OBW is voluntary for the Member States, it entails an indirect mandatory requirement for, in particular, the vehicle manufacturers, with additional costs that are not justified.

Annex 1, 1.1 and 1.6.1

DK proposal	
1.1	
- ...	
- trailer	12,00 m
- articulated vehicle	16,50 17,88 m
- road train	18,75 m
- ...	
1.6.1	<u>13,38 m</u>
Maximum distance between the axis of the fifth-wheel king pin and	

the rear of a semi-trailer - in case the semi-trailer is documented suitable for intermodal transport operations.	
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SE requests a clarification on whether the proposed increased length for semi-trailers used in intermodal transport will be able to be transported on today's railway wagons.

Annex I sub section 2.2

SE understands that the compromise proposal for articulated vehicle combinations according to Annex I sub section 2.2 point 2.2.2 has both +2 and +4 tonnes when including a ZEV. We would like to get clarity on which weight is intended to apply for articulated vehicle combinations. According to the definitions in Article 2 states that an articulated vehicle combination consisting a motor vehicle coupled to a semi-trailer. It appears that this both creates a double regulation, and a lack of clarity about what applies.

Annex 1, 3.6.1 and 3.6.2 (Tri axles of motor vehicles)

DK proposal		SE proposal	
The sum of the axle weights per tri-axle must not exceed, if the distance (d) between the axles is:			
3.6.1 1,3 m or less ($d \leq 1,3$)	21 tonnes	3.6.1 less than 1,3 m or less ($d \leq 1,3$)	21 tonnes
3.6.2 over 1,3 m and up to 1,8 m ($1,3 < d \leq 1,8$)	24 tonnes	3.6.2 over 1,3 m or greater but less than and up to 1,8 m ($1,3 \leq d \leq 1,8$)	24 tonnes

Justification:

In the very last compromise proposal before Coreper, during Spain's presidency, was the changes that we are now proposing included. Since there is no explanation why this is not included in this compromise proposal, we understand it to be a mistake.

Annex I sub section 2.2

In order to further create the conditions for an uptake to more ZEVs, SE proposes the following text in Annex I subsection 2.2.

	SE proposal
	2.2 In the case of zero-emission vehicles, the maximum

	authorised weights provided for in points 2.2.2 (b) of Sub-section 2.2 shall be increased by 6 tonnes.
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A consequence of the proposal above the following changes is needed.

DK proposal	SE proposal
2.2 In the case of vehicle combinations including zero-emission motor vehicles the maximum authorised weights provided for in points Sub-section 2.2.1 and 2.2.2 (a), (b) and (c) of Sub-section 2.2 shall be increased by 4 tonnes	2.2 In the case of vehicle combinations including zero-emission motor vehicles the maximum authorised weights provided for in points Sub-section 2.2.1 and 2.2.2 (a), (b) and (c) of Sub-section 2.2 shall be increased by 4 tonnes

Justification:

In order to further create the conditions for an uptake to more ZEVs, SE proposes a gross weight of 46 tonnes for the combination in Annex I sub section 2.2 point 2.2.2 (b). This weight can be permitted without exceeding the maximum permissible axle, bogie and triple axle loads. However, a prerequisite is that the formula in 4.3 is included. This weight should therefore be able to be implemented for this combination without causing too much impact on the infrastructure. 46 tonnes is also within DK's proposal that no combination should be permitted a gross weight higher than 46 tonnes.

Annex I sub section 2.3

In order to further create the conditions for an uptake to more ZEVs, SE proposes the following text in Annex I subsection 2.3.

	SE proposal
	2.3 In the case of zero-emission vehicles, the maximum authorised weights provided for in points 2.3.1 of Sub-

	section 2.3 shall be increased by 2,5 tonnes.
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	SE proposal
	2.3 In the case of zero-emission vehicles, the maximum authorised weights provided for in points 2.3.2 of Sub-section 2.3 shall be increased by 1 tonne.

A consequence of the proposal above the following changes is needed.

DK proposal	SE proposal
2.3 In the case of zero-emission vehicles, the maximum authorised weights provided for in points 2.3.1, 2.3.3, 2.3.4, 2.3.5 and 2.3.6 of Sub-section 2.3 shall be increased by 2 tonnes.	2.3 In the case of zero-emission vehicles, the maximum authorised weights provided for in points 2.3.1, 2.3.3, 2.3.4, 2.3.5 and 2.3.6 of Sub-section 2.3 shall be increased by 2 tonnes.

Justification:

According to Annex I sub section 2.3 point 2.3.1 the gross weight of a two-axle motor vehicle, other than a bus, may amount to 20 tonnes if it is a ZEV. A two-axle bus in sub section 2.3 point 2.3.1 is not allowed to have a gross vehicle weight higher than 19.5 tons even if it is a ZEV. In order to further create the conditions for an uptake to more ZEVs, SE proposes that the gross weight of these vehicle can amount to 20.5 tonnes. This weight is within the maximum axle weights, for example 11.5 tonnes on the driving axle and 9 tonnes on the front axle.

Annex 1, 2.3.6 (maximum weight for five-axle motor vehicle)

DK proposal		SE proposal	
2.3.6 Five-axle motor vehicles with two steering axles	36 40 tonnes	2.3.6 Five-axle motor vehicles with <i>at least</i> two steering	36 40 tonnes

and at least with one driving axle fitted with twin tyres and air suspension or suspension recognized as being equivalent within the Union as defined in Annex II, or where each driving axle is fitted with twin tyres and the maximum weight of each axle does not exceed 9,5 tonnes.		axles and at least with one driving axle fitted with twin tyres and air suspension or suspension recognized as being equivalent within the Union as defined in Annex II, or where each driving axle is fitted with twin tyres and the maximum weight of each axle does not exceed 9,5 tonnes.	
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Justification:

A five axle motor vehicle has normally a total of three steered axels. Two on the front and one at the rear of the triple axle. Without our proposed addition, it will not be allowed to have three steered axles on these vehicles. Introducing such a limitation cannot be the purpose of the proposal.

Annex 1, 4.3 (Maximum authorised weight depending on the wheelbase of a vehicle combination)

DK proposal	SE proposal
<p>4.3 <u>The maximum authorised weight in tonnes of a vehicle combination may not exceed the maximum of 42 t or the weight given by the formula</u></p> <p><u>Weight in tonnes $\leq 2,7 \times A + 13,5$</u></p>	<p>4.3 <u>The maximum authorised weight in tonnes of a vehicle combination provided for in Sub-section 2.2.1 and 2.2.2 may not exceed the maximum of 42 tonnes or the weight given by the formula</u></p> <p><u>Weight in tonnes $\leq 2,7 \times A + 13,5$</u></p>

Justification:

Sweden are glad to see that the Danish presidency has re-introduces Belgium's bridge formula. But we would like it to only be applied to vehicle combinations that the directive handles and whom can have a higher gross weight than 42 tonnes. The formula should therefore be limited to include the combinations, i.e. the combinations that appear in Annex I sub section 2.2.1 and 2.2.2. If this is not introduced, the possibility of conducting cross-border traffic between MS that nationally allows higher gross weights may be limited, which is probably not the intention. An addition according to our proposal is therefore needed.