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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12730/1/25 REV 1
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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 the Netherlands

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

WK 12414/2025 ADD 3

LIMITE

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Written Comments the Netherlands – Weights and Dimensions 26 September 2025

- We would like to thank the Presidency for the latest proposal and for giving priority to this directive.
- Regarding the weight limit, we believe that harmonization should remain a core objective of this revision, and we therefore support the harmonization of 44-tonnes limit for fossil fueled trucks, as well as extra weight allowance for zero-emission vehicles, provided that the driven axle loads remain within 11.5 tonnes.
- We are also in favor of a phase-out period for diesel vehicles, as previously included in the proposal. Therefore, we find the removal of the phase-out deadline from recital 12 and article 4b.3 (originally set for 2035) unfortunate. We believe that having a clear deadline would encourage a faster transition to zero-emission mobility.
- Regarding recitals 17a and 17b , where the use of OBMM-system is proposed, we have some questions and remarks.
 - How will non-zero-emission vehicles be monitored?
 - If this control measure is implemented, it should apply equally to all vehicles. Otherwise, it risks unfair competition. There shouldn't be differences between vehicles with, for example, Smart Tacho 2 and those without, as this would create advantages or disadvantages depending on the tachograph type.
- Regarding article 4, we would like to ask the presidency about removing the text on the monitoring and assessing the impact of European Modular Systems. Furthermore, we would like to ask the presidency about removing the text on the possibility of implementing Intelligent Access Schemes. We are in favor of keeping this possibility for the future for purposes of monitoring our road networks in relating to heavy duty vehicles. Currently we are researching the possibility of using the Electronic Braking System (EBS) for the purpose of monitoring the impact of (exceptional) transport on our road infrastructure. The EBS already exists within most vehicles which takes away the necessity of a retrofit, as proposed in the text. This monitoring is especially relevant for vehicles with a high risk profile, such as the EMS and other exceptional transport. In order to maintaining our road infrastructure, it is important that our road authorities have knowledge regarding the vehicle weights and axle loads that are driving across our road network
- Article 10d(2) states that Member States are required to conduct an "appropriate" number of checks, but it remains unclear what constitutes an "appropriate" number. We propose that this be more clearly defined in absolute terms or % of roads and type of vehicles and change of being caught or fined
- Regarding Annex 1.1, the length of the articulated vehicle has been extended to 17,88 m. We are not in favor of extending the length of this vehicle because we are uncertain about the effects on traffic safety. This also applies to the addition in Annex 1.6.1. We are not in favor of extending the maximum distance (between the axis of the fifth-wheel king pin and the rear of a semi-trailer).
- As for the addition in Annex 1.1, we would like a clarification on whether the increase in length also applies to diesel vehicles, as the word "including" suggests. In our opinion it should be restricted to only zero-emission vehicles.
- We are not in favor of the formula in Annex 4.3 for calculating the maximum weight based on the wheelbase. The Directive already includes maximum axle loads based on axle distance, so for us it is unclear what this formula adds. Also, this formula will make

enforcement on heavy duty vehicles more difficult. In addition, we seek clarification regarding the use of the word 'or' in the context of the formula. Does this imply that compliance with either the 42-ton weight limit or the formula is sufficient?

- As for the addition in article 4a regarding the one stop shop, we would like to place a scrutiny reservation and come back to you at a later stage on this matter.
- Recital 21 and Article 10k regarding military transport in times of crisis, we would like to ask the presidency if this allows for civil chauffeurs/vehicles that are requested to drive for our military to drive without a formal exemption. Currently, our military have this possibility but civil chauffeurs/vehicles do not. This would ease military transport performed by civil chauffeurs/vehicles. Furthermore, the need for military transport already becomes apparent before the crisis actually occurs. Our Ministry of Defense would be in favor