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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 Finland

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

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 = ST 12730 2025 REV1

Written comments and drafting proposals by Finland 26.9.2025

Finland would like to provide the following remarks and drafting proposals for the Presidency compromise.

Art. 4a
The changes regarding the one-stop-shop and single national access point are good and can function in real life.

4b
We are fine with changes from combination weights to axle-, bogie-, and bridge -regulation weights on art. 4b par 1.
We do see that it's important to give a clear incentive for the zero-emission vehicles, so we can live with deleting the sunset clause of 2035.

Art.10b
The changes regarding the maximum authorized weights of alternatively fueled or zero-emission vehicles seems to be line with the bigger picture.

Art.10 d par 1
As such, we are not opposing the proposals regarding On-board mass weighting equipment, as long as they stay on a voluntary basis. We would just like to know a bit more about the technical aspects on how this would work in real life. For example, if the bodywork is designed for heavier liquids than water or hygiene related transport, such as milk, how the calibrations are done exactly?

As this would cause additional costs for the operators and the national authorities, it would be good to know an assessment of the cost per vehicle.

Art. 10da
We see that implementing the Intelligent Access Policy (IAP) should be on a voluntary basis, and therefore we are fine with this proposal.

Article 10g – paragraph 1 – subparagraph 1
We are fine with the changes, but perhaps we could still delete the **"location"** from the point (c). Not very effective for control´s point of view to tell the exact locations of the automatic systems set up on the road infrastructure.

Annex 1

Point 3.5.3
Giving 1 tonne addition for zero emission vehicles when they are 18 tonnes/19 tonnes would increase the attractiveness of zero-emission trucks while reducing road loads. As a result, the road load would be lower and it would be easier to load the vehicle to its full permitted capacity. The weight would

be distributed more evenly across all three axles in a 3-axle vehicle, and the load on the front axle would not become unreasonably high.

EC	FI Proposal
3.5.3 Where the driving axle is fitted with twin tyres and air suspension or suspension recognised as being equivalent within the Union as defined in Annex II, or where each driving axle is fitted with twin tyres and where the maximum weight for each axle does not exceed 9,5 tonnes	3.5.3 Where the driving axle is fitted with twin tyres and air suspension or suspension recognised as being equivalent within the Union as defined in Annex II, or where each driving axle is fitted with twin tyres and where the maximum weight for each axle does not exceed 9,5 tonnes. ***In case of zero-emission motor vehicles, the maximum sum of the axle weights per tandem axle shall be increased by 1 tonne.***

Point 2.3

At the end of point 2.3, Presidency proposes that a 2-axle bus should not be allowed to have an additional 2 tonnes due to zero-emission status, contrary to what the Commission and the Parliament have proposed. Finland supports Presidency´s proposal as it's definitely a better solution for infrastructure.

Points 2.3.5 and 2.3.6

Currently, there is no mass for a four-axle nor five-axle motor vehicles with a driving front axle and two driving rear axles included in Annex I. The change is needed, since there could be more than just one driving axle. Therefore, we propose a clarification to the text as follows;

EC	FI proposal
2.3.5 Four-axle motor vehicles with two steering axles where the driving axle is 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	2.3.5 Four-axle motor vehicles with two steering axles and ~~with~~ ***at least with one*** ~~the~~ 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.
2.3.6 Five-axle motor vehicles with two steering axles where the driving axle is 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.	2.3.6 Five-axle motor vehicles with two steering axles and ~~with~~ ***at least with one*** ~~the~~ 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.

3.4
Glad to see the driving axle remaining 11,5t. Definitely essential for the road infrastructure.

3.6 Tri-axles of motor vehicles
We are happy to see this point here, as it is very important to have a common weight for tri-axles so that each Member State won't do them in different ways. Otherwise, there won't be harmonized 5-axle motor vehicle in the EU. Unfortunately, there has been probably a copy paste error in somewhere in the process, as the marking are not fully correct.

Presidency compromise	**FI Proposal**
3.6.1 1,3 m or less (d ≤1,3) 21 tonnes	3.6.1 ***less than 1,3 m*** (d < 1,3) 21 tonnes
3.6.2 over 1,3 m and up to 1,8m (1,3 <d ≤ 1,8) 24 tonnes	3.6.2 ***1,3 m or greater but less than 1,8 m*** (1,3 ≤ d < 1,8) 24 tonnes

In order to follow the same logic as in point 3.5, there must be the higher mass when the axle distance is exactly 1.3m (point 3.6.2).