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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 5191/26
N° Cion doc.:	ST 11722/23 + ADD 1 - 5
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 - Four-column document = Further comments from Finland

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

Finland's written comments on W&D 10.3.2026

1) 82, 21b [specific for the forestry industry, explained in R21b]

FI supports GA. The final part, i.e. 'operations linked to logging and the forestry industry', should be moved to the recitals, as it serves an explanatory rather than normative function.

2) 83, 84, 84a, 21c [Shuttle transport 1.38 m]

Line 83: FI **strongly** supports GA. The addition " *weights*" should be added alongside the dimensions for a coherence. If a Member State decides to allow circulation of EMS nationally, it should be allowed under the same conditions for all operators to ensure equal competitive opportunities.

Lines 84, 84a, 21c: FI can support the shuttle transport addition.

3) 122a, 122b, 122c [Article 7, road safety concerns]

Lines 122a-c: FI supports GA as these are good additions for ensuring road safety.

4) 159 to 171 [possibility of IAP (Intelligent Access policy) schemes, it is a 'may' provision.]

•Lines 159-171,180,190c: FI supports GA on deleting the references to the IAP-systems, as Europe already has more cost- effective enforcement tools that achieve the same safety objectives without continuous tracking. If such a reference is deemed necessary, it should stay as a "may" provision.

[IAP systems would not be suitable for Europe in their current form according to various expert and authority assessments. An IAP- style system would not work in Europe because it conflicts with EU data- protection rules, would be very difficult to harmonise across 27 Member States, and would impose disproportionate costs on transport operators. Implementing such a scheme would require certified telematics units, continuous data transmission, third- party monitoring services and ongoing subscription fees—all of which would place a heavy financial and administrative burden particularly on SME transport companies.]

5) 184 [Commission to issue recommendations to a MS if needed].

FI sees that EP's suggestion would only add bureaucracy and confusion.

6) 187a to 187b and 190a to 190e [EP reporting obligations].

Lines 187a-b: FI is flexible with this one. As to our understanding, this is a standard formulation for delegated acts, reflecting the common two- month objection procedure, extendable by a further two months.

Lines 190a-e:FI sees that these points would be part of the next revision anyhow, so quite unnecessary to have them here.

7) 85a, 89, 89a, 89b, 90, 91 [EMS, road safety & ex ante impact]

•Line 85a: FI supports GA. If really needed, FI can accept the EP's suggestion as long as it only concerns **new** EMS- routes.

•Line 89-89a: In general, FI does not support EMS-monitoring systems, but if there would be any, they should concern only **new** EMS- users. It is essential that the impact assessments take into account the actual current situation and the practices that have proven effective in reality.

[The present Nordic transport system has developed in a controlled and gradual manner over several decades. In Finland, the number of trucks is not used as a metric; instead, transport performance is measured in millions of kilometres. The volume of EMS1 traffic has exceeded 500 million kilometres annually for the past 25 years.]

•Line 89b: EP’s proposal to introduce minimum requirements or a certification scheme for EMS drivers would risk creating barriers within the internal market. Moreover, **this issue should not be addressed in this Directive**, but rather in the Driving Licence Directive. In Finland, drivers are trained to operate with all types of vehicle combinations. If any additional requirements were considered, a possible compromise could be to mandate a certain number of years of driving experience with smaller trucks before operating an EMS- combination. However, any such national requirement should be left for a Member State to decide.

Line 90: FI **strongly** supports GA. If a Member State allows the use of EMS in national traffic, it should also accept their circulation in international traffic under the same national conditions. Adding “national conditions” ensures consistency, such as safety requirements.

Line 91: EP’s suggestion on prior-assessment for EMS should concern only **new** EMS-users. Some Member States have had EMS-combinations already for decades, so it’s basically impossible to do a prior-assessment.

8) 93, 94, 95, 96 [EMS, duration, can ‘shall’ become ‘may’, Delegated/Implementing Acts]

Line 93-96: FI supports GA, as EP’s suggestion would make the trials basically impossible and hamper the future innovations within the sector. FI can be flexible with the duration of the trials. The possible monitoring systems should take into account the countries that are already using the EMS and not add bureaucracy. [Not sure what “shall” would become “may”?]

9) 103a, 103b, 103c, 104 [Web portal possibility]

Line 103 a: Finland can be flexible in this matter, but would like to point out that it is not possible to have all restrictions from the private road network and temporary restrictions from the municipal street network on one platform. In addition, we prefer not to publish bridge weight limits for indivisible loads as some of that information is not to be shared for national security reasons.

Line 103c: FI could support EP’s suggestion on EU web portal.

Line 104: FI supports GA, as EP’s suggestion on harmonizing the escorting transport of indivisible loads is too difficult in real life.

10) 106, 107, 108 [Article 4b]

Line 106-108: FI **strongly** supports GA. Allowing higher-weight combinations when they include zero- emission vehicles or are used in intermodal transport supports the transition to cleaner and more efficient logistics. Zero- emission vehicles often require additional weight capacity due to technology, and intermodal transport depends on consistent rules across borders.

11) 118a, 118b, 118c, 118d [EP changed ‘may’ to ‘shall’ line 118c]

FI can be flexible with this one.

12) 171a to 171b revenues from penalties to be used for the support of market uptake of sustainable transfer means.

Penalty revenues fall under the state budget, and it should be for Member States to decide how they are used. If such a reference is deemed necessary, it should be placed in the recitals.