



Council of the European Union  
General Secretariat

Brussels, 22 October 2025

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**Interinstitutional files:**  
**2023/0265 (COD)**

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WK 14045/2025 ADD 6

**LIMITE**

**TRANS**  
**CLIMA**  
**ENV**  
**COMPET**  
**CODEC**

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## **WORKING DOCUMENT**

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From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12730/2/25 REV 2
N° Cion doc.:	ST 11722/23 INIT + 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 - Revised Presidency compromise proposal = Comments from Romania

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

Romania's position concerning **12730/2/25/Rev.2 –Proposal for a Directive of the European Parliament and of the Council amending Council Directive 96/53/EC laying down the maximum authorised weights and dimensions**

Romania appreciates the efforts of the PCY to move forward on the sensitive aspect of weights and dimensions, but continues to maintain its position that **the current weights and dimensions limits need to be kept, including for zero emissions vehicles.**

Member States should retain the right to apply mass limits in accordance with the load-bearing capacity of their own infrastructure and in line with the legal framework and maximum limits already established. The improvement and reduction of CO<sub>2</sub> emissions cannot be achieved on infrastructure where measures are applied to stimulate an increase in maximum authorized masses in circulation without enhancing the load-bearing capacity — in other words, on infrastructure that is undergoing accelerated degradation.

In this regard, the obligations to accept the proposed total masses for zero-emission vehicles should not become mandatory for Romania, and Member States should retain the right to apply mass limits in accordance with the load-bearing capacity of their own infrastructure and in line with the legal framework and maximum limits already established.

We continue to oppose EMS and the changes proposed in considerent 11a.

We also wish to oppose the changes proposed in 17a and 17b, point (13) Article 10d. In Romania, initiatives are being promoted to implement infrastructure-based control/weighing systems that do not interfere with on-board mass monitoring systems (OBMM) or the on-board weighing systems (OBW) through remote communication using short-range digital communication (DSRC). We do not agree with a mandatory solution requiring the installation of such on-board equipment. However, we understood the explanations of the DK PCY that this could remain optional for the Member States that wish to apply OBMM. We still have doubts about the timelines for implementation of such changes.

In this context, for an accurate assessment of all these incentive measures focused on zero-emission heavy-duty freight vehicles, we would like to ask whether there is an impact study analysing the capacity of electricity networks (or the potential for their development) to ensure the amount of electrical energy required for charging these electric vehicles, at the European vehicle fleet level, within a timeframe consistent with the implementation of the incentive measures promoting the use of zero-emission vehicles.

Article 1, (c) paragraph 3 - **we wish to raise a scrutiny reservation**, as this is regulated at the national level in terms of maximum authorized masses and dimensions.

Article 4, paragraphs (3) and (4) - we could agree with the language regime. However, within the framework of ancillary road transport services for large indivisible goods, in order to meet the legal requirements for the special authorization of logistics services for the safe performance of exceptional transports (indivisible loads), examinations shall be conducted in Romanian.

Article 4a- We agree with the proposed wording, as steps are currently being taken to ensure national access points through a single system, which may take the form of a website. We already have such a

“site” (web application) in operation, which can be further developed or integrated with other applications to create a single access point for vehicle authorization. In this context, there will be no impediment regarding digitalization in this area for Romania, which will ensure, in due time, the access required by the Directive.

Article 4b -1 Any provision aimed at increasing the already established maximum permissible limits should not become mandatory, as it is not currently justified. A general provision is needed to allow Member States to decide whether to permit the circulation of zero-emission vehicles exceeding 40 tonnes. However, in Romania, the circulation of vehicles with a mass greater than that provided for in the current Directive can only be carried out with the issuance of a special transport permit, in accordance with the legal framework and the maximum permissible limits currently transposed into national legislation.

We do not prohibit their circulation; rather, we authorize it under the conditions and limitations imposed by the load-bearing capacity of the infrastructure, safety conditions, and route restrictions, all of which must be considered, as well as the maximum permissible masses per axle/axle configuration.

Furthermore, vehicles involved in intermodal transport operations must comply with the rules currently in force.

Article 4, paragraph 4 (c) - we do not agree with the proposed changes. We object to the idea that deviations from Annex I do not significantly affect international competition in the transport sector. This would breach the principle of non-discrimination; the argument that international competition is not significantly affected is insufficient and, in fact, demonstrates a distortion of fair competition between operators, turning the measure into one based on the notion of partial impact on competition. Moreover, the reference distance of 650 km as the crow flies would, in practice, involve crossing or covering extensive routes in most EU countries without ensuring that appropriate logistics centres where the load could be changed actually exist.

Article 10b-2 - Even though exceeding the maximum permitted length does not have a direct impact on infrastructure, increasing the maximum length only for zero-emission vehicles would lead to a differentiation in the classification and charging of these vehicles/users of less polluting vehicles compared to other users, a situation that could create a distortion of competition between users. In this regard, we express a reserved position towards such increases, including for road safety reasons (as heavy vehicles may exceed both mass and length limits), and we consider it necessary, at this stage, to maintain the same length limit for all vehicles, regardless of the propulsion system used.

Annex – maximum weights and dimensions and related characteristics of vehicles:

- We agree with the amendments concerning the expression of axle distances in points: 2.2.4; 3.2.2; 3.2.3; 3.2.4; 3.3.1; 3.3.2; 3.5.2; 3.5.3; 3.6.1; 3.6.2.
- As we have consistently maintained, we do not agree with these increases, taking into account the technical arguments developed by the specialists of CNAIR, which we have already presented in previous similar proposals regarding the increase of maximum authorised masses, in relation to the road infrastructure in Romania. We also express reservations regarding the proposed increase of the maximum permitted vehicle length, which comes in addition to the proposals concerning maximum authorised masses.

- As for the calculation formula in point 4.3 – Maximum authorised weight depending on the wheelbase – we cannot express a position in the absence of a clear technical basis, which we have not identified. The proposal needs clarification so that it is not considered an empirical formula. The condition/formula for the 4-axle solo vehicle in point 4.3 has been extrapolated and modified for articulated vehicle combinations. The consideration of the wheelbase is already applied when defining axle configurations, and we believe this should remain the only reference, without overlapping it with an additional formula for total mass that takes into account the wheelbase between the first and last axle of the vehicle.