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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° Cion doc.:	13259/25 + ADD 1
Subject:	Amended proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 1999/62/EC, Council Directive 1999/37/EC and Directive (EU) 2019/520 as regards the CO2 emission class of heavy-duty vehicles with trailers and clarifying and simplifying certain provisions - Comments from Germany

Delegations will find, attached, comments from Germany on the above-mentioned proposal.

Commentary from Germany on

Amended proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 1999/62/EC, Council Directive 1999/37/EC and Directive (EU) 2019/520 as regards the CO2 emission class of heavy-duty vehicles with trailers and clarifying and simplifying certain provisions

(ST 13259/25 + ADD 1)

Germany would like to thank the European Commission for the preparation of the amended proposal and its presentation at the Working Party meetings on 2 and 15 October 2025 and for the organisation of the expert exchange on 30 October 2025.

In principle, Germany supports the promotion of measures that contribute to emission reductions in road transport. However, when considering concrete measures, it must also be taken into account that the effort and costs of planned measures are proportionate.

In our view, the proposal regarding the classification of heavy-duty vehicles with energy-efficient trailers in CO2 emission classes is currently in principle not suitable for implementation. A comprehensive impact assessment, which also considers the impact on the toll systems of each Member State, is missing for a full assessment.

The proposed changes require an extremely complex and costly implementation in the German toll system.

In the expert exchange on 30 October 2025, the European Commission explained that the additional costs of energy-efficient trailers are significantly lower than, for example, for fully battery-electric vehicles. In addition, the additional costs for these trailers would be more than compensated by the energy savings alone. Against this background, an additional incentive for better classification in the CO2 emission classes does not appear necessary. This is particularly true if implementation costs and their possible impact in general on the level of toll rates are taken into account.

Germany therefore supports in principle the published positions of the Netherlands, France, Poland and Sweden.

Due to the time-critical aspects, Germany supports the separation of the proposal proposed by Poland and Sweden.

Germany also refers to its comments of 10 October 2025 (WK 13437/2025 INIT).