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WK 14664/2025 ADD 2

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12730/3/25 REV 3
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 Ireland

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

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LIMITE

EN

IE Comments - st12730-re03.en25 – Weights & Dimensions Directive Revision.

General Comments

We thank the Presidency for their efforts to advance this important revision of the Weights & Dimensions Directive. It is positive to see progress on this file.

We welcome the clarification and change to allow 4 tonnes additional weight to apply to 3-axle motor vehicles only, with an additional 2 tonne weight applying to 2-axle motor vehicles or to 3-axle motor vehicles involved in intermodal transport only. We also note that this keeps the overall maximum weight allowed at 46 tonnes, which Ireland's bridge infrastructure can accommodate.

We have highlighted some inconsistent text in relation to specified dimensions of Annex items 2.2, 3.3 and 3.6. Grateful if these could be reviewed to ensure consistency and to match values specified in the existing text of Directive 96/53/EC, unless they are intentional changes.

Specific Comments/Queries

Amendments to Directive 96/53/EC

- **Article 1 1(c) – replacing paragraph 3C**

We thank the Presidency/Commission for clarification on these vehicle types.

However, we do not feel that it is appropriate to include them specifically, and they would be more appropriate to be considered as part of individual Member States national legislation.

- **Article 4 - Entry into force and application**

We welcome the increase to 4 years to allow for the set-up of the 'one-stop-shop' functions.

Annex 1

- **2.2.4.1 – suggested rewording**

'not more than 1,8 m/ reworded as 'Less than or equal to 1.8m' for consistency.

Current wording doesn't allow for lengths exactly equal to 1.8m.

- **2.2 Vehicle Combinations**

*In the case of vehicle combinations including zero-emission motor vehicles the maximum authorised weights provided for in points 2.2.1 **(b)** and 2.2.2 ~~(a) and (b)~~ of Sub-section 2.2 shall be increased by 4 tonnes.*

In the case of vehicle combinations including zero-emission motor vehicles the maximum authorised weights provided for in points 2.2.1 (a) and 2.2.2 (a), (c) and (d), 2.2.3 and 2.2.4 of Sub-section 2.2 shall be increased by 2 tonnes.

We welcome the clarification in this regard and the application of the additional 4 tonnes to 3-axle motor vehicles.

- **3.3.1/3.3.2 – Changing of Values/Wording clarification**

Should this be “equal to or less than 1,3m”, or is this an intentional change? The current wording in 96/53/EC is “equal to or less than 1,3m”.

This changes the limits and means that 3.3.2 now starts at 1.3 m instead of greater than 1.3m as previously.

We note the wording change ‘equal to or greater than 1,3 m’, linked to the above. This changes the limits and means that 3.3.2 now starts at 1.3 m instead of greater than 1.3m as previously.

Should this be ‘less than or equal to 1,4m’, or is this an intentional change?

- **3.6 - Tri-axles of motor vehicles**

We suggest this should be ‘Tridem of motor vehicles’.

- **3.6.1/3.6.2 – Changing of Values/Wording clarification**

Should this be “equal to or less than 1,3m”, or is this an intentional change? The current wording in 96/53/EC is “equal to or less than 1,3m”.

This changes the limits and means that 3.3.2 now starts at 1.3 m instead of greater than 1.3m as previously.

We note the wording change ‘equal to or greater than 1,3 m’, linked to the above. This changes the limits and means that 3.3.2 now starts at 1.3 m instead of greater than 1.3m as previously.

We note the change to 1,4 m ($1,3 \leq d \leq 1,4$) from 1,8m.