



Council of the European Union  
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WK 14664/2025 ADD 3

**LIMITE**

**TRANS  
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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 12730/3/25 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 Germany

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

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WK 14664/2025 ADD 3

**LIMITE**

**EN**

**DEU Comments on** Presidency's compromise proposal of 2025-10-24.

= 12730/3/25 REV 3

**Introductory Remarks**

DEU thanks the presidency for the good work on the current compromise proposal and has only a few remaining amendment suggestions. If these are taken into account, we see no obstacles to agreeing on a General Approach.

Regarding Article 4b, DEU welcomes that a solution has been found which ensures that hauliers from different Member States can operate under equal competitive conditions.

## I. Key Aspects of the new Compromise Proposal

Please find below a list of our suggested changes (marked in **bold and underlined**) and questions. In addition, a brief justification/comment has been provided for each amendment.

### 1. Extract from the new Compromise Proposal

#### Recital 11ab

Member States should be permitted to allow specialised transport operations that are carried out in circumstances in which they are not normally carried out by vehicles from other Member States, allowing such operations to deviate from standard vehicle weights and dimensions as such specialised transport do not significantly impact international competition within the transport sector. It is necessary to provide clarity to the concept and use of specialised vehicles, particularly in the context of extending such operations to international traffic, to enable seamless cooperation between consenting Member States. Clear examples are transport operations linked to logging and the forestry industry, transport performed with *vehicle combinations with more than six axles*, and local transport with buses.

#### DEU comment:

DEU requests clarification as to why “vehicle combinations with more than 6 axles” are now listed as examples in the recital as explanatory note to Article 4(4)(a). This concerns vehicle technology solely. Furthermore, we would like to point out that all EMS generally have more than 6 axles.

In the other examples - and also in the previous wording of the directive - only the **specific type of use of the vehicles** is relevant: **activities** that are not normally carried out by other Member States and therefore no threat to international competition. The number of axles a vehicle has is irrelevant in this context.

## 2. Extract from the new Compromise Proposal

### Article 10k

Where a crisis affects several Member States, the Commission may adopt implementing acts **at the request of the Member States concerned** in order to establish temporary exceptions from the application of the weights and dimensions limits set out in Annex I for vehicles used in international traffic between affected Member States.

#### **DEU comment:**

The addition (bold and underlined) has already been agreed upon in previous compromise proposals. We assume that this passage was deleted by mistake and kindly request to reinstate.

### 3. Extract from the new Compromise Proposal

#### Annex I No. 1.1. and 1.6

1. Maximum authorised dimensions for the vehicles referred to in Article 1(1), point (a)		
1.1 Maximum length		
	— articulated vehicle	17,88 m 16,50 m
1.6.1	Maximum distance between the axis of the fifth-wheel king pin and the rear of a semi-trailer - in case the semi-trailer is documented suitable for intermodal transport operations	13,38 m

**DEU comment:**

DEU refers to its last statements and kindly asks the Presidency to re-examine the points raised concerning extended articulated vehicles and to submit proposals. DEU also refers to the points raised by ITA and POL in the last RAG.

It is emphasized once again that compatibility with pocket wagons in intermodal transport is demonstrably possible. This aspect could be an important incentive for investment in modern solutions.

#### 4. Extract from the new Compromise Proposal

##### Annex I No 2.2

2.2 Vehicle combinations			
2.2.1	Road trains with five or six axles		
	(a) two-axle motor vehicle with three-axle trailer <b><u>or three-axle motor vehicle with two-axle trailer</u></b>	40 tonnes	
	(b) three-axle motor vehicle with <del>two</del> or three-axle trailer	40 tonnes	
2.2.2	(a) two-axle motor vehicle with three-axle semi-trailer <b><u>or three-axle motor vehicle with two-axle semi-trailer</u></b>	40 tonnes	
	(b) three-axle motor vehicle with <del>two</del> or three-axle semi-trailer	40 tonnes	
	(c) two-axle motor vehicle with three-axle semi-trailer <b><u>or three-axle motor vehicle with two-axle semi-trailer</u></b> involved in intermodal transport operations	42 tonnes	
	(d) three-axle motor vehicle with <del>two</del> or three-axle semi-trailer involved in intermodal transport operations	44 tonnes	
2.2.3	Road trains with four axles consisting of a two-axle motor vehicle and a two-axle trailer	36 tonnes	
2.2.4	Articulated vehicles with four axles consisting of a two-axle motor vehicle and a two-axle semi-trailer, if the distance between the axles of the semi-trailer is:		
	2.2.4.1	equal to or greater than 1,3 m and not more than 1,8 m (1,3 ≤ d ≤ 1,8)	36 tonnes
	2.2.4.2	greater than 1,8 m (1,8 m < d)	36 tonnes
	In case the maximum authorised weight (MAW) of the motor vehicle (18 tonnes) and the MAW of the tandem axle of the semi-trailer (20 tonnes) are respected and 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 the maximum authorised weight provided for in point 2.2.4.2 shall be increased by 2 tonnes.		

	<p>In the case of vehicle combinations including alternatively fuelled vehicles other than zero-emission vehicles, the maximum authorised weights provided for in Sub-section 2.2 shall be increased by the additional weight of the alternative fuel technology with a maximum of 1 tonne.</p>
	<p>In the case of vehicle combinations including zero-emission motor vehicles the maximum authorised weights provided for in points 2.2.1 <b>(b)</b> and 2.2.2 <del>(a) and (b)</del> of Sub-section 2.2 shall be increased by 4 tonnes.</p>
	<p>In the case of vehicle combinations including zero-emission motor vehicles the maximum authorised weights provided for in points <b>2.2.1 (a) and 2.2.2 (a)</b>, (c) and (d), 2.2.3 and 2.2.4 of Sub-section 2.2 shall be increased by 2 tonnes.</p>

**DEU comment:**

In the German justification from the Presidency's compromise proposal of 2025-10-09 (12730/2/25 REV 29) we expressed that we also must consider three-axle motor vehicles with two or preferably three axle trailer (2.2.1(b)) or three-axle motor vehicles with two or preferably three-axle semi-trailer (2.2.2(b)). This combination with a three-axle motor vehicle and two-axle semi-trailer should also be possible for vehicles operating in intermodal transport (2.2.2(c)).

However, the proposed amendment contributes to ensuring compliance with axle load limits and thereby enhances clarity and operational safety for all hauliers involved.

**5. Extract from the new Compromise Proposal**

**Annex I No. 2.3.6**

2.3.6	Five-axle motor vehicles with at least two steering axles and at least with one 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	<del>36</del> <u>34</u> tonnes
In the case of zero-emission vehicles, the maximum authorised weights provided for in points 2.3.1, 2.3.3, 2.3.4, 2.3.5 and 2.3.6 of Sub-section 2.3 shall be increased by 2 tonnes.		

**DEU comment:**

The new five-axle motor vehicles presented in Annex I 2.3.6 (36 tonnes) is still not acceptable. Please note that according to the current directive, motor vehicles shall not be heavier than 32 tonnes. Our amendments to the proposal ensure a higher weight in 2.3.6 and additional weights for zero-emission vehicles.