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To:	Working Party on Land Transport
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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 = Revised comments from Belgium

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

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

Comments from the Belgian Delegation

04-11-2025

Belgium welcomes the last efforts made by the Danish Presidency to reach a general approach on the revision of the Weights and Dimensions Directive. We still hope for a swift conclusion to the negotiations in favor of greater harmonisation and decarbonation of road transport. However, we have still some concerns regarding cross-border transport of ≤ 44 tonnes and sum of the axle weights per tri-axle.

1) Article 4b

In principle, we remain in favour of removing all cross-border barriers to the movement of 44 tonnes vehicles in the interests of greater harmonisation. We believe it is important to support the sector in its transition to electric vehicles and we still hope that an alternative solution will be found.

2) Annex

3.3.2 and 3.6.2

We would have preferred to see tridem (tri-axles) for motor vehicles and towed vehicles adjusted to a definition of up to 1.8 m as for other vehicles or vehicle combinations for the sake of consistency and to avoid different interpretation among Member states for distance between axles above 1,4 m for such vehicles.

Could the Presidency share its view on this matter? More specifically the possibility to consider a tridem with distances bigger than 1,4m and smaller than 1,8m as two tandems. How do the Presidency and the Commission define tridems and tandems?

In order to limit the impact on our infrastructure we can only allow for 25,6 tonnes for a tridem with distances bigger than 1,4m and smaller than 1,8m. See annex next page.

Annex

In short, we prefer a limitation of 25,6 tonnes for a tri-axle with axle distances between 1,4m and 1,8m. A consideration of 27 tonnes is possible, but only if the bridge formula remains in the text.

According to the current proposal tri-axes with axle distances between 1,40m and 1,80m can be considered as 2 combined tandem axles where the total load can theoretically go up to 28 tons (or even 29 tons, if the combined tandem axles have a driven axle that is fitted with twin tyres and air suspension). However, this is far too detrimental for our infrastructure.

Therefore, we find it necessary that tri-axes are described up to 1,80m to make sure that every country uses the same maximum loads for tri-axes.

As it is currently written, the rule is open to interpretation and it is unclear what tonnages apply.

Preferably, we go to a limitation of 25,6 tons on a tri-axle with axle distances from 1,4m to 1,8m. With this load we limit the effects on our infrastructure to the same level as that resulting from current traffic loads.

We have incorporated this adjustment in the tables below (proposal A).

Notice that we added the word 'smallest' to clarify the definition of the distance 'd'.

Proposal A:

<i>3.3 Tri-axes of trailers and semi-trailers</i>			
	The sum of the axle weights per tri-axle must not exceed, if the smallest distance (d) between the axles is:		
	3.3.1	1,3 m or less ($d \leq 1,3$)	21 tonnes
	3.3.2	over 1,3 m and up to 1,4 m ($1,3 < d \leq 1,4$)	24 tonnes
	3.3.3	over 1,4 m and up to 1,8 m ($1,4 m < d \leq 1,8 m$)	25,6 tonnes

<i>3.6 Tri-axes of motor vehicles</i>			
	The sum of the axle weights per tri-axle must not exceed, if the smallest distance (d) between the axles is:		
	3.6.1	1,3 m or less ($d \leq 1,3$)	21 tonnes
	3.6.2	over 1,3 m and up to 1,4 m ($1,3 < d \leq 1,4$)	24 tonnes
	3.6.3	over 1,4 m and up to 1,8 m ($1,4 m < d \leq 1,8 m$)	25,6 tonnes

Higher tri-axle loads would result in loads on our infrastructure that are higher than those resulting from current traffic. Especially when several motor vehicles will be present on the bridge simultaneously at a short distance from each other. But although higher tri-axle loads would be detrimental for our infrastructure, we are prepared to accept them as a compromise in order to approve the texts in their current form and preserve provisions that benefit us, such as the bridge formula.

As a compromise, we would propose allowing a higher mass for the tri-axes, but only from a **1,5m axle distance instead of 1,4m**. This would distribute the higher loads a little better. See proposal B below.

As mentioned, this proposal is already more detrimental to our infrastructure compared to current traffic. Such an increase would not cause stability problems for well-maintained structures. However, given that we have recently approved multiple weight increases in favour of zero-emission (ZE) vehicles and combinations — for example in Flanders: 6-axle combinations 48 t + 2 t ZE (approved 2021), 5-axle combinations 44 t + 2 t ZE (draft regulation), and at EU level 4-axle motor vehicles 32 t + 2 t ZE (draft regulation) — it would nevertheless accelerate the deterioration of our infrastructure.

Proposal B:

<i>3.3 Tri-axles of trailers and semi-trailers</i>		
	The sum of the axle weights per tri-axle must not exceed, if the smallest distance (d) between the axles is:	
3.3.1	1,3 m or less ($d \leq 1,3$)	21 tonnes
3.3.2	over 1,3 m and up to 1,5 m ($1,3 < d \leq 1,5$)	24 tonnes
3.3.3	over 1,5 m and up to 1,8 m ($1,5 \text{ m} < d \leq 1,8 \text{ m}$)	27 tonnes

<i>3.6 Tri-axles of motor vehicles</i>		
	The sum of the axle weights per tri-axle must not exceed, if the smallest distance (d) between the axles is:	
3.6.1	1,3 m or less ($d \leq 1,3$)	21 tonnes
3.6.2	over 1,3 m and up to 1,5 m ($1,3 < d \leq 1,5$)	24 tonnes
3.6.3	over 1,5 m and up to 1,8 m ($1,5 \text{ m} < d \leq 1,8 \text{ m}$)	27 tonnes

All tri-axles (= axle groups of 3 axles with distances less than or equal to 1,80m) heavier than 27 tons are too detrimental to our infrastructure. A tri-axle mass higher than 27 tons is therefore a red line for us and we do not allow it.

If it is not possible to agree on one of the above proposals, the following proposal C can be accepted as a last resort. But again, we emphasize that we only propose this as a compromise to keep the bridge formula in the European regulations and to somewhat limit the current tri-axle load, but that this proposal actually has a detrimental effect on our infrastructure.

Proposal C:

<i>3.3 Tri-axles of trailers and semi-trailers</i>		
	The sum of the axle weights per tri-axle must not exceed, if the smallest distance (d) between the axles is:	
3.3.1	1,3 m or less ($d \leq 1,3$)	21 tonnes
3.3.2	over 1,3 m and up to 1,4 m ($1,3 < d \leq 1,4$)	24 tonnes
3.3.3	over 1,4 m and up to 1,8 m ($1,4 \text{ m} < d \leq 1,8 \text{ m}$)	27 tonnes

<i>3.6 Tri-axles of motor vehicles</i>		
	The sum of the axle weights per tri-axle must not exceed, if the smallest distance (d) between the axles is:	
3.6.1	1,3 m or less ($d \leq 1,3$)	21 tonnes
3.6.2	over 1,3 m and up to 1,4 m ($1,3 < d \leq 1,4$)	24 tonnes
3.6.3	over 1,4 m and up to 1,8 m ($1,4 \text{ m} < d \leq 1,8 \text{ m}$)	27 tonnes