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General Secretariat

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WK 4377/2026 ADD 1

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 5191/26
N° Cion doc.:	ST 11722/23 + 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 - Four-column document = Comments from Finland

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Delegations will find, attached, comments from **Finland** 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– Examination of the four-column document = (ST 5191/26). Presidency compromise proposals (12 March 2026).**

*Written comments and drafting proposals by Finland 20.3.2026.*

Finland would like to provide the following remarks on the four-column document and the proposals submitted by the Presidency.

### **Indivisible loads and associated permits/language obligations and tool**

○ *Lines 18, 21, 33*

FI supports GA on 18 since SERT- requirement is undesirable bureaucracy. If a quick decision has to be made using a standard form that does not contain all the information required for a special transport case, the decision will be negative, even though it could be positive if more detailed information could be requested.

FI is fine with the EP's addition on recital 21 regarding the EU web-portal is fine, but the EU form for indivisible loads should be alongside the national one.

FI can support 33 if there is also a possibility to have a national form alongside the EU form.

○ **Lines 77, 78, 79, 79a:** Common Standard application/permits

FI can accept these, with the notion that permit processing sometimes requires, for example, a condition inspection or more detailed calculations for a specific bridge. Strict time limits would be impossible to follow when there are extra demanding indivisible loads to be transported.

○ **Line 103c:** web Portal

FI can support Presidency's compromise with the links as additional administrative burden should be avoided.

○ **Line 104:** implementing act

FI supports GA, as EP's suggestion on harmonizing the escorting transport of indivisible loads is too difficult in real life. We don't think that a fully harmonised application form nor a assessment process would work well for different types of transport situations. There needs to be flexibility for a national assessment, since transporting, for example a 15- meter flagpole and a 70- meter wind turbine blade, are very different things in traffic. Road safety should be in the heart of this.

### **EU Label**

○ *Line 26a*

In general FI can support the common EU label for length, but this should consider only cross-border transport, and nationally MS could still use their own national "long" signs if they have had them for a long time already.

○ **Line 79a:** display of EU Label

Finland can support this with indivisible loads when the dimensions of the combination are bigger than those of the normal combinations used in the Member State. There is no need for EU label when the transport is a special transport only because of the weight of the indivisible load.

○ **Lines 146a, 146b, 146c, 146d, 146e:** EMS EU label

Finland has been using "long"-labels nationally for the longest EMS2- combinations (34,5m) already for very long time. Road users are already very used to national markings. With the proposal covering *all* transport, we would have to put a sign to almost every single truck, and it would create great confusion, significant costs for transport companies and jeopardize national

traffic safety. Essentially, we see that the EMS EU- label should be only for international transport and national labels should continue to be allowed to use. As a compromise for international traffic could be that the signs already in use would be allowed for example 10 years, while new signs would have to comply with the EU-label rules, for instance, within one year from the entry into force of the technical requirements concerning those signs.

It should also be taken into account that EMS- combinations consist of several parts that can be detached and loaded as needed throughout the transport journey, for example by leaving part of the combination waiting at a terminal for a while. In such cases, the trailer may ultimately end up attached to different combinations, and the signs may end up with the wrong combination. This could hamper the enforcement.

### Single national Access point/OSS/Web Portal

#### ○ Line 21

FI cannot support EP's addition on recital 21 as the scope of information is too broad, EU format could be alongside the national one and the web-portal as such is okay, but the scope of it should be considered more closely as transporting indivisible loads can also be more of a case-by case assessment.

#### ○ Line 102, 102a, 103, 103a, 103b, 103c: national access point, OSS

Line 103 a: Finland can be flexible in this matter, but would like to point out that it is not possible to have all restrictions from the private road network and temporary restrictions from the municipal street network on one platform. ***In addition, we prefer not to publish bridge weight limits or height restrictions for indivisible loads as some of that information is not to be shared for national security reasons.*** The number of height restrictions can be really high when we talk about high indivisible loads so this should be handled case by case when issuing special permits.

Line 103b FI can support Press proposal on the "publication of the National Access Points" in the COM Webpage.

Line 103c: FI can support this, but only the part "*the parts of the road network where vehicles transporting indivisible loads can circulate*" would be very difficult to publish since different type of indivisible loads will need different assessment that are done case by case.

In addition to these clusters, Finland would like to raise ahead few remarks regarding line 80 and Annex 1 point 4.3.

**Line 80:** FI strongly supports GA and cannot accept Presidency's proposal to accept the EP amendment. If there is a need for a midway solution, FI proposes to add point 4.3 to the list in order to cover the bridge rule.

EP amendment	FI proposal
<i>4. Member States may allow vehicles or vehicle combinations used for transport which carry out certain national or international transport operations that do not significantly affect international competition in the transport sector to circulate in their territory with weights or dimensions deviating from those laid down in points 1, 2, 4.1. 4.2 and 4.4 of Annex I.</i>	<i>4. Member States may allow vehicles or vehicle combinations used for transport which carry out certain national or international transport operations that do not significantly affect international competition in the transport sector to circulate in their territory with weights or dimensions deviating from those laid down in points 1, 2, 4.1. 4.2, <b>4.3</b> and 4.4 of Annex I.</i>

## Annex 1

**Point 4.3:** The Council's bridge rule takes well into account different kind of transport operations, while also securing the infrastructure. It is *absolutely necessary* to ensure that the mass of heavy trucks is distributed well when crossing short-span bridges, this is a traffic safety issue. COM and EP did not have a suggestion to this one, and therefore Council's proposal should stay.

Vehicles have been subject to the bridge rule for a long time already, and all parties agreed at the Council that it must remain in place. The purpose is to protect short-span bridges, as there are thousands of them across the EU. When all the recent mass increases are combined and the load is very heavy, too much weight can be applied over a short distance. These cases are not common, but even a small number of them would significantly shorten bridges' lifespan. Therefore, such additional loading cannot be allowed. The Council -mandated new bridge rule applies only to combinations over 42 tonnes, so it does not negatively affect current traffic. New electric technology generally makes vehicles longer, which means the bridge rule is easier to meet. However, certain special cases could develop in ways that would threaten infrastructure, and those cannot be allowed.