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LIMITE

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WORKING DOCUMENT

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

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).

Written comments and drafting proposals by Finland 15.5.2026

FI would like to thank the Presidency for its continued efforts. The compromise package provides a solid basis for further progress towards the upcoming trilogue.

Indivisible loads and permits

Article 4 (lines 78–80 + related recitals)

- Lines 78–79:
FI can support the provisions. However, we still note that strict time limits would be impossible to follow when there are extra demanding indivisible loads to be transported (e.g. infrastructure checks or bridge calculations), which will require additional time.
- Recital 23 (line 33):
FI remains cautious regarding references to common deadlines, even at recital level, as strict timelines may lead to automatic refusals in more complex cases.

→ **Line 80:**

FI underlines that this provision is of particular importance for the Nordics. It is essential that the final wording preserves sufficient flexibility for Member States and reflects existing operational realities. Note also our previous written comments (20.3.2026).

OSS, digital platform and language requirements

Article 4a (lines 103a–104)

- Line 103a:
FI can support.
- Line 103c:
FI can support the Presidency's approach:

FI notes that:

- full publication of routes for indivisible loads is not feasible, as assessments are case-specific
- certain infrastructure-related data cannot always be disclosed
- Line 104:
FI supports the use of “minimum elements” to ensure flexibility for national systems. For us it is important that national practices can be kept.
- Line 103aa (new):
FI notes that the reference to “official language of the institutions of the Union” does not fully reflect the equality of the EU's 24 official languages. However, in the spirit of compromise, FI can accept this formulation.

EU label

Article 10ca (lines 146c, 146da + recital 16a)

- FI can be supportive of the Presidency compromise:
 - limitation of the EU label to international traffic
 - mutual recognition of the EU label
- FI underlines that:

- national labelling systems should remain possible in domestic transport
- the proposed timeline for Commission implementing acts appears rather short
- Recital 16a:
FI can be flexible on this, provided that Member States are clearly only **encouraged** to use the EU label in national traffic.

EMS and trials

EMS provisions (relevant lines under Article 4)

FI can be supportive of the Presidency compromise, including:

- limiting pre-assessment to infrastructure checks
- monitoring during trials

FI would nevertheless like to underline the following:

- EMS provisions must remain practical and enabling and should not introduce unnecessary administrative burden.
 - Monitoring and assessment requirements should take into account Member States where EMS is already widely in use, avoiding disproportionate obligations.
 - EMS trials:
The assumption that equivalent routes could automatically be used after trials does not reflect practical realities. Infrastructure varies significantly between routes, and this should not result in a requirement for separate trials for each route.
- A realistic and proportionate approach is essential.

Internal market consistency (horizontal point)

FI would like to underline the importance of ensuring internal market consistency:

- Where EMS are permitted nationally, their use in international traffic under the same conditions should be possible. This applies to situations where EMS are permitted in both countries and it meets both countries national requirements.
- This supports equal treatment of operators and avoids unnecessary fragmentation.

Crisis situations

- Lines 194–195:
FI can support the Presidency approach and show flexibility.