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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 Hungary

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

HUNGARIAN COMMENTS

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

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Related to document No ST 5191/26

Regarding the four-column document:

Hungary maintains its previously stated position. We did not support the general approach, and we do not support those elements included in the four-column document which were not discussed in the Council Working Party meetings, or which introduce conditions less favourable than those agreed at that level.

Hungary's objections and remarks to the four-column draft are as follows:

Over the past three years, more than 3,500 lane-kilometres of primary roads have been rehabilitated, corresponding to a total pavement surface area of 13.5 million m², alongside the refurbishment of more than 320 bridges. Lifecycle monitoring supported by a Pavement Management System (PMS) has also been introduced. These efforts reflect a continued commitment to promoting environmentally sustainable freight transport. At the same time, it is important to acknowledge the increasing pressure that higher gross vehicle weights place on the road network.

In Member States where rail freight transport is already well developed and operates efficiently, a generalised requirement to introduce European Modular System (EMS) vehicles may lead to unintended shifts in the freight market that could run counter to broader EU transport policy objectives. In this context, flexibility for Member States should be preserved, and mandatory provisions on EMS should be approached with caution.

Our current regulatory framework already provides incentives for environmentally friendly freight transport, including an additional allowance of 2 tonnes of gross vehicle weight and, in certain cases, permitting the circulation of vehicle combinations of up to 44 tonnes without additional charges. In this regard, it would be appropriate to clarify that the value set out in Table 1 of the Council proposal under point 2.2.2(d), as well as the calculation provided at the end of the table, should not exceed a total of 44 tonnes.

Efficient and environmentally sustainable freight transport is closely linked to the availability of appropriate information systems. In this respect, it would be beneficial to further explore the development of a comprehensive, multimodal (road, rail, inland waterway at least, and air is coming up) EU-level route planning application covering the full logistics chain and capable of reducing the need for existing route permit systems.

Such an application could include publicly accessible information on load-bearing capacities of roads and related infrastructure and could usefully complement the eFTI electronic freight transport platform, which currently does not provide route planning functionality. The European Digital Infrastructure Consortium (EDIC) under DG CNECT, in particular its EDIC Mobility & Logistics strand, could offer a suitable framework for taking this work forward.

Pending the availability of such an information system, it would be appropriate to clarify Recitals 11e, (row 21e in the 4 column document) as follows:

"(11e) Whereas the Directive allows for derogations from the maximum weights and dimensions, Member States may continue to be able to restrict, for reasons related to road safety or infrastructure characteristics, the circulation of certain vehicles in ~~specific~~ any parts of their road network."

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