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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 8127/25
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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 - Comments from Estonia

Delegations will find, attached, comments by **Estonia** on the above-mentioned document.

Written comments - Estonia (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 – R8448/2/24 REV 2)

Estonia would like to thank the Presidency for the revised compromise text on the weights and dimensions directive. We support the aims of the proposal of both working towards the sustainable transition of transport and harmonisation of rules. At the same time, it is also important not to increase the administrative burden unproportionally. To this aim, a number of comments can be found below which in our mind would positively impact this proposal and hopefully lead to a balanced compromise.

Article 4b

In our opinion, a possible compromise in this article could be that any restrictions or prohibitions should not be introduced on international traffic of vehicle combinations with 6 axles. With 5 axles, the prohibitions or restrictions could be applied in case of shown negative effect on infrastructure/road safety etc. but we are supportive of simplifying this process. Furthermore, we are supportive of the delaying of the sunset clause in paragraph 3.

Explanation: Nationally, Estonia has allowed 6-axle 44t combinations for the past 20 years and the negative effects on infrastructure are markedly smaller than in case of 5-axle combinations as load bearing is more even.

Article 9a

In the current version of the directive, a vehicle may be longer than the maximum dimensions if it has a cab with better aerodynamics, etc., but there is no limit to how much the dimensions can be exceeded. To our mind, specific dimensions should be set here and we are open to discussion on this.

Explanation: We have identified a problem in supervision of this as there is no constant from which to calculate the extent of the length overrun in accordance with Regulation 2016/403, e.g whether it is an infringement of the SI or of the VSI. It does not help that it is stipulated that the load capacity must not increase as a result, since the parameters of the load compartment are not defined, nor is it possible to carry out a full turn test on the road to verify that the combination complies with Annex I, point 1.5. For example, Article 8b lays down certain limits for the use of a device to improve aerodynamics at the rear of the vehicle. It would also be helpful for the manufacturer to specify in the vehicle information how much longer the vehicle is due to Article 9a.

In addition, other aspects of the directive that still could be improved in our opinion which are not currently reflected in the text:

- In **article 4a**. We would prefer to see that the one-stop-shop obligation would automatically apply only for applicants from another Member State.
- In **article 4b**. With the aim of legal clarity, there should be a possibility that heavier than 44t vehicle combinations could to be able to be used for cross-border traffic if both Member States agree on their use.
- On **article 10b paragraph 2**. In our opinion, the text would benefit considerably if it also reflected “alternatively fuelled vehicles” in addition to Zero-Emission Vehicles to take into account technological neutrality.

- In **article 10d paragraph 2**. We would rather not have this sentence about appropriate number of checks performed at night time included in the text as it seems an unnecessary requirement to legislate.

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