

EUROPEAN ECONOMIC AREA

STANDING COMMITTEE OF THE EFTA STATES

Ref. 24-336

7 March 2024

SUBCOMMITTEE II ON THE FREE MOVEMENT OF CAPITAL AND SERVICES

EEA EFTA Comment

on the revised Weights and Dimensions Directive

1. EXECUTIVE SUMMARY

- *The Agreement on the European Economic Area (EEA Agreement) extends the Single Market of the European Union to the EEA EFTA States (Iceland, Liechtenstein and Norway). The incorporation of EEA-relevant EU legislation into the EEA Agreement, such as Council Directive 96/53/EC (Weights and Dimensions Directive), ensures legal homogeneity and facilitates trade and mobility throughout the EEA.*
- *The EEA EFTA States welcome the European Commission's proposal for a revised Weights and Dimensions Directive, as included in the Road Safety Package.¹ The EEA EFTA States support the Commission's overall ambition to promote road safety, free movement, intermodal transport, the use of zero-emission vehicles and a reduction in greenhouse gas emissions.*
- *The EEA EFTA States express concern, however, about the reduced flexibility for neighbouring EEA States to enter into bilateral agreements authorising the cross-border operation and circulation of vehicles with weights and dimensions exceeding the limits set in the directive.*
- *The EEA EFTA States encourage the introduction of additional technical requirements under the revised directive on the minimum distance between the rearmost axle of the motor vehicle and the front axle of the (semi) trailer. Such requirements are especially important in relation to the proposed increased weight limits for zero-emission vehicles and vehicle combinations.*

¹ [Proposal for a revised Weights and Dimensions Directive \(COM\(2023\) 445\)](#)

- *The EEA EFTA States support the introduction of specific conditions for the authorisation of the circulation of European Modular Systems (EMS) on national territories and in international traffic.*
- *However, the EEA EFTA States recommend the inclusion of tracking requirements for the entire European Modular System, and not solely for the individual vehicles it comprises. When the precise tracking curve characteristics of EMS as a whole are not known, it is difficult to effectively differentiate the road network with regard to their circulation.*

2. REMARKS ON THE PROPOSAL

1. The EEA EFTA States welcome the Commission's proposal for a revised Weights and Dimensions Directive, as included in the Road Safety Package. The EEA EFTA States support the Commission's overall ambition to promote road safety, free movement, intermodal transport, the use of zero-emission vehicles and a reduction in greenhouse gas emissions.
2. However, the EEA EFTA States **express concern about the proposed reduced flexibility for neighbouring EEA States to enter into bilateral agreements authorising the cross-border operation and circulation of heavier and/or longer vehicles** between their territories. It is possible that such a restriction could have adverse effects on trade, transport costs and greenhouse gas emissions, and could exacerbate challenges related to the shortage of drivers. The EEA EFTA States therefore believe that it is crucial that established practices in cross-border traffic between neighbouring EEA States can be continued under the revised directive.
3. The EEA EFTA States **encourage the introduction of additional technical requirements under the revised directive on the minimum distance between the rearmost axle of the motor vehicle and the front axle of the (semi) trailer**. The lack of such requirements for vehicle combinations in international traffic, especially for articulated vehicles, increases the risk of concentrated loads exceeding the permitted traffic loads under national load-bearing capacity calculations. These requirements are especially important in relation to the proposed increased weight limits for zero-emission vehicles and vehicle combinations, and for the calculation of the potential impact of increased axle loads on infrastructure. In addition, any uncertainties related to the relevant technical parameters of heavy-duty vehicles constitute a significant challenge to national calculations of the impact of such vehicles on infrastructure. These uncertainties may lead local road authorities to impose potentially unnecessary restrictions on heavy-duty vehicles on certain road sections. The EEA EFTA States therefore recommend the introduction of additional technical requirements on the minimum distance between the rearmost axle of the motor vehicle and the front axle of the (semi) trailer for all vehicles and vehicle combinations to facilitate free movement and prevent unnecessary restrictions on certain road sections.
4. The EEA EFTA States **support the introduction of specific conditions for the authorisation of the circulation of European Modular Systems (EMS) on national territories and in international traffic**. Clear, harmonised conditions, and the

predictability they will provide, will likely lead to an increase in the uptake of EMS by operators in the EEA. This, in turn, will improve the energy and operational efficiency of transport operations and contribute to the greening objectives of the transport policy.

5. However, the EEA EFTA States highlight the importance of considering the tracking curve characteristics of the entire European Modular System, and not solely of the individual vehicles it comprises. This is of particular importance in areas with certain geographical conditions resulting in narrow, winding and steep roads. When the precise tracking curve characteristics of the EMS as a whole are unknown, it is difficult to effectively differentiate the road network with regard to their circulation. From a road traffic safety perspective, this makes it difficult to assess which curves may result in parts of a modular vehicle crossing over to the lane of oncoming traffic, or to consider the possible halting of EMS on infrastructure features such as roundabouts or slip roads.
6. Furthermore, the lack of tracking requirements for the complete modular system, and the subsequent challenges related to assessing the accessibility of roads for EMS, could lead to the closure of currently accessible roads in the EEA States as a precautionary measure. **The EEA EFTA States therefore recommend including tracking curve requirements for the entire European Modular System under the revised directive.** Alternatively, the EEA EFTA States suggest allowing the possibility for individual EEA States to differentiate their road networks with regard to which types of EMS are allowed, or between EMS that comply with national requirements and those that are not subject to such requirements in international traffic.
7. These comments are given without prejudice to further comments from the EEA EFTA States and an assessment of the final act, which will be carried out by the EEA EFTA States once the act has been adopted by the EU.