JOINT STATEMENT ON THE WEIGHTS AND DIMENSIONS DIRECTIVE

29 October 2025

In the ongoing discussions around the revision of the Weights and Dimensions Directive (WDD 96/53/EC), the undersigned organizations **believe that the text would cause severe side-effects, impacting more than the transport sector.** These issues need to be considered prior to adopting a legislative act.

The introduction of longer, higher and heavier European Modular Systems (EMS) is incompatible with the Commission's commitment to increase rail freight by 50 % in 2030 and 100 % in 2050, as set out in the Sustainable and Smart Mobility Strategy.

We strongly urge all policy and decision-makers to consider the following considerations:

1. Incompatibility with intermodal freight transport

European logistics operates as a system. Any modification of the Directive must guarantee the compatibility of all road components with the rail and waterborne freight systems, its rolling stock and vessels, as well as its technical, operational and transshipment parameters.

Despite broad consensus on the importance of intermodality, and significant public and private investments in rail and terminal infrastructures, all efforts would be undermined by the increase in dimensions currently under consideration for the European Modular System trucks. Several EMS combinations are incompatible with intermodal transport (e.g. requiring adaptations in container design, impairing craneability, or undermining the necessary compatibility of road units with railway or waterborne equipment, including rolling stock). **Extensive logistical and infrastructural changes** would be necessary to ensure compatibility with transshipment terminals, their access roads and on-site maneuvering. For example, almost half of the terminals surveyed have stated that access, movement, or parking on the terminal site is not possible with overlong vehicles.[v] **Moreover, accepting the proposal to increase the maximum length of semi-trailers beyond the standard 13,6 m would be incompatible with a large portion of railway rolling stock and several types of waterborne vessels. These developments will effectively hamper the progress of intermodal freight transport.** Policy incentives are needed to promote the use of rail and waterways for longer transport legs.

2. Heavy cargo belongs to the modes of transport ideal for heavy cargo: freight trains and waterborne vessels

Railway infrastructure is built to support 22,5t axle loads and waterborne vessels are capable of carrying the same or even heavier loads. The road infrastructure, on the other hand, dominantly handles vehicles with axle loads of 1-3 tonnes. Each vehicle-kilometer performed with a vehicle with axles that are heavier than 10 tonnes will therefore cause an accelerated degradation of the road infrastructure.

The result of the revised Directive would be an increased circulation of vehicles with heavy axles, bringing with it an increased frequency of road infrastructure maintenance. The reinforcement of road surfaces, bridges and overpasses will require continuous and significant investments by Member States. It will cost many billions at national, regional and local levels and the prolonged road-works sites will cause frequent road congestion.

Extending motorway ramps and parking spaces in truck stops, as well as installing the necessary signage to direct the circulation of longer and heavier trucks would also require significant additional road infrastructure investments.

3. There is a risk of undercutting of the investments made in the rail infrastructure

During the past years, European and national public policies and investments have been determined to improve intermodal transport and the rail sector across the EU. Important efforts have been made, and a lot remains to be done, given the important additional needs to improve the intermodal transport system.

Since 2014, the Connecting Europe Facility – Transport (CEF-T) programme has supported Europe's railway infrastructure with EUR 31 billion[i]. At national level, the investment plans can be illustrated with Germany. The current federal government plans to invest EUR 107 billion euros into railways between 2025-2029.[ii] Two-thirds of the population see the construction and expansion of the rail network as the most sensible measure to cope with growing transport volumes.[iii] Another example is Spain, with over EUR 6.6 billion allocated from European recovery funds to rebalance the modal split of freight transport toward less polluting modes through initiatives such as the completion of the European rail corridors and the promotion of intermodality in ports and logistics centers.[iv]

4. Dangerous cargo should be transported by the modes of transport with the best safety record: freight trains and waterborne vessels

Longer, higher and heavier road vehicles, if spreading more widely, will likely be used more often to carry dangerous goods, which raises important safety concerns that remain insufficiently addressed. Accident statistics of heavy trucks point to significant safety gaps, especially when travelling longer distances. The heavier the vehicle, the more serious the results of an accident. EMS trucks heavier than 44 tonnes have longer braking distances, extended maneuvering radiuses and require longer clearance times. The existing infrastructure - bridges, tunnels, and roundabouts - is not designed for these heavier and longer trucks, increasing the risk of accidents often due to misalignment or overloading.

The Directive does not prescribe any stricter requirements for the drivers of longer, higher and heavier trucks. Considering the recent amendment of the Drivers' License Directive, it may be reasonably assumed that less experienced drivers as young as 18 will be allowed into the driver's seat of these longer and heavier trucks thus exacerbating accident risks.

5. Negative impact on climate and air quality objectives

Several amendments proposed to the Directive are promoted for their CO2 and pollutant emission-reduction potential. This can be higher than 10% for certain EMS variations. The resulting reverse modal shift from intermodal and rail freight transport to the EMS truck variations nevertheless threatens a net increase in both CO2 and pollutant emissions since intermodal and rail freight emissions are up to 90% lower than average trucks and 75-80% lower than EMS truck variations. This would undermine the decarbonisation and clean air objectives of the European Union.

6. There will be more trucks on the roads

Longer and heavier EMS truck combinations will not result in fewer trucks on the roads. Rather than promoting intermodality in freight transport, these will likely result in a reverse modal shift of up to 21% of rail freight across all segments switching from rail to road.[v] This translates to between 6.7 million to 13.3 million additional truck journeys per year.[v] Similar measures in other countries have already shown that extending the length of trucks did not lead to a reduction in road traffic volumes.[vi]

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[i] European Commission. European Climate, Infrastructure and Environment Executive Agency (CINEA). Greener Transport Infrastructure for Europe. 2014-2024: Building future-proof infrastructure thanks to the Connecting Europe Facility Transport. 30 June 2025. Last accessed in September 2025 at: https://webgate.ec.europa.eu/cineaportal/apps/storymaps/stories/48c1f6a4ce33415fb4ec40dd2aa836bd.

[ii] Germany. Federal Ministry of Transport. Press Release. Schnieder: 166 billion for transport infrastructure. 24 June 2025. Last accessed in September 2025 at https://www.bmv.de/SharedDocs/DE/Pressemitteilungen/2025/029-schnieder-166-milliarden-fuer-verkehrsinfrastruktur.html.

[iii] DIE GÜTERBAHNEN. Opinion poll: Majority wants investment in rail expansion and renovation. March 2025. Last accessed in September 2025 at https://die-gueterbahnen.com/news/meinungsumfrage-mehrheit-wuenscht-sich-investitionen-in-ausbau-und-sanierung-der-schiene.html.

[iv] Spain. Ministry for Transport. Mercancías 30. May 2022. Last accessed in October 2025 at https://cdn.mitma.gob.es/portal-web-drupal/mercancias30/2022_05_documento_final_mercancias_30_.pdf.

[v] D-FINE. Study on Weights and Dimensions Summary. January 2024. Impacts of the Proposed Amendments to the Weights and Dimensions Directive on Combined Transport and Rail Freight Transport.

[vi] CABT. Bigger trucks = nearly 8 million more trucks. Diversion Issue Paper.