



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT

Directorate C – Land  
**The Director**

Brussels  
MOVE.DDG2.C/KS

Mr. Pasi MOISIO  
CEO and Head of Brussels Office  
FinMobility  
Mr. Marcus DAHLSTEN  
CEO Transportföretagen

Dear Mr. Moisiso, dear Mr. Dahlsten,

**Subject: The joint position of FinMobility and Swedish Confederation of Transport Enterprises on the revision the Weights and Dimensions Directive**

Thank you for your joint letter of 22 February 2023, addressed to Executive Vice-President Frans Timmermans, Commissioner Adina Vălean, and Director-General Henrik Hololei, sharing FinMobility's and Transportföretagen's joint position on the upcoming revision of the Weights and Dimensions Directive for heavy-duty vehicles (HDVs). They have asked me to reply on their behalf.

As you know, the primary objective of the revision of the Weights and Dimensions Directive is to contribute to the decarbonisation of road freight transport and to deepen the internal market, by among other things, removing technical and regulatory barriers to the use of longer/heavier vehicles in cross-border operations and the uptake of zero-emission HDVs. As the stakeholder consultations have been completed, we are now analysing a number of policy measures that would best contribute to the achievement of these objectives, while safeguarding road safety and protection of road infrastructure.

I would like to thank you for your valuable contributions to the Call for Evidence and the Open Public Consultation on the revision of the Weights and Dimensions Directive. I can reassure you that we drew on your inputs to refine the possible policy measures. Finland's and Sweden's extensive experience with the effective and safe use of European Modular Systems (EMS), the demonstrated improvements in operational and energy efficiency of transport operations by heavier and/or longer vehicles and the associated socioeconomic benefits are well taken into account in our impact assessment analysis.

Although, as outlined in the Commission's Sustainable and Smart Mobility Strategy, the main goal is to boost the uptake of zero-emissions HDVs, the use of current energy efficient solutions like the EMS will not be hindered or unduly restricted. We are aware that internal combustion engine vehicles will still represent an important part of the HDV fleet between now and 2050. As you point out in your letter, existing schemes like the EMS can still contribute to the decarbonisation efforts. Therefore, one of the policy measures under assessment concerns allowing longer and/or heavier vehicles (e.g. modular systems and 44t vehicles) in international intra-EU traffic between all Member States whose national technical standards (going beyond the limits set out in the Directive) are compatible.

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We recognise that infrastructure standards and operational conditions vary between Member States, therefore, the Directive's revision will maintain the current flexibility of Member States to permit higher weight and dimension limits for HDV in national traffic, as is already successfully done in Finland and Sweden since many years.

I hope this response allays your main worries. I want to thank you again for your constructive approach and I am looking forward to continued collaboration. I am confident that we can create a level playing field for the transportation industry's future that is sustainable, intelligent, and resilient.

Yours sincerely,

Kristian SCHMIDT