

Commission proposal for the renewal of the Weights and Dimensions Directive - EMS and cross-border transport between Finland and Sweden






According to the Commission proposal of 11th July 2023, international traffic with combinations above the values in Annex 1 of the Weights and Dimensions Directive will be allowed in the case of EMS combination as defined in the Directive. The reference to EMS combinations poses the following problems for traffic between Finland and Sweden:

The maximum permitted height would be 4.0 m. At present, the border can be crossed with a vehicle 4.4 m high, which is the maximum permitted height in Finland (*in Sweden the height is unlimited*)

- **A reduction in the height would adversely affect at least the following transport segments: general cargo, roundwood, wood chips and other forest industry by-products, waste and scrap, and roadside assistance vehicles.**

The maximum length of the actual full trailer, including the drawbar, would be 12.0 m.

- **This reduction in the length of the full trailer would adversely affect at least the following transport segments: general cargo, roundwood, wood chips and other forestry by-products, waste and scrap, car and vehicle transport and tank transport.**

	Height	Length of the full trailer	Volume of traffic crossing the border
	Finland: 4,4 m Sweden: free EMS 4.0 m	Finland: ~17,6 m Sweden: free to 24 m combined length EMS: 12.0 m	
Cargo/Bulk combis, chips, waste, etc. 	60-80% of traffic between Finland and Sweden exceeds a height of 4.0 m. ✘	There are trailer combinations in circulation with a full trailer length of more than 12.0 m ✘	The volume of traffic is very high, - hundreds of thousands border crossings per year.
Roundwood combinations 	100 % of traffic between Finland and Sweden exceeds a height of 4.0 m. ✘	100 % for traffic between Finland and Sweden, the length of the (full) trailer itself is more than 12.0 m.. ✘	1 million m3 per year 16 400 loads per year
Tank transport combinations 	Some of the tank combinations are more than 4.0 metres high.	60-70 % for traffic between Finland and Sweden, the length of the (full) trailer itself is more than 12.0 m.. ✘	There are hundreds of tank combinations in cross-border traffic.
Car and vehicle transport combinations 	100 % of traffic between Finland and Sweden exceeds a height of 4.0 m. ✘	No problem with the length	
Sand and gravel, earthmoving combinations 	No problem with the height	90% of full trailers exceed 12,0 m in length ✘	

Furthermore, the proposed directive would set the maximum authorised mass of the trailer itself at 24 tonnes. Currently, the maximum permissible total mass of a 5-axle trailer in traffic between Finland and Sweden is 42 tonnes.

- ***This limitation of the mass of the trailer to 24 tonnes would make it practically impossible to use trailers in traffic between Finland and Sweden. For the combinations described in the table above, 100% of trailers exceed 24 tonnes.***

In addition, the following differences in dimensions and masses between Finland and Sweden and in the proposed directive must be considered:

Width: In Finland the maximum width of a lorry and trailer is 2.60 m. up to a combined length of 22 m. In Sweden 2.60 m. up to a combined length of 24 m respectively. According to the Weights and Dimensions Directive, the maximum width of a lorry and trailer is 2.55 m., except in the case of temperature controlled transport.

Bogie masses: the proposal for a Directive on weights and dimensions does not recognize the bogie mass of a three-axle bogie for a vehicle. In transport between Finland and Sweden, there are many combinations with a three-axle bogie on the tractor unit (e.g. *timber/round-wood combinations, tank truck combinations and gravel transport/earthmoving combinations*). The axle weight of a three-axle bogie in Finland-Sweden cross-border operations is 24 tons.



Most of the crossings between Finland and Sweden are by Ro-Ro vessels on the Helsinki - Stockholm, Turku - Stockholm and Vaasa - Umeå routes. In addition, in the very sparsely populated area of the North, there is also cross-border transport between Finland and Sweden.

There is no rail link between Finland and Sweden due to the different track gauges.

A suggested solution to the situation:

In principle, it is a positive step to define EMS in the Directive and to enable and clarify the transport of longer and heavier combinations in Europe. However, it is necessary to make certain exceptions to the dimensioning of the EMS to allow the continuation of the practices that have been in place since Finland and Sweden joined the EU (1995) for transport between the two countries. It is necessary to add an exception to Article 4 of the Directive in relation to the dimensions of EMS combinations where national dimensions other than set out in Annex 1 are in use in a Member State:

If a Member State has nationally derogated from Annex 1, points 1.1 (trailer length), 1.2 (maximum authorized width), 1.3 (maximum authorized height) or 2.1 (mass of trailer as part of the combination) of the Directive, an EMS operating to such a Member State is entitled to derogate from the values in Annex 1 of the Directive for these dimensions.

The bogie mass of a triaxle bogie of a vehicle shall be defined as 24 tons in Annex 1 to the Directive.

Allowing international EMS traffic to use the maximum permitted height of the country of destination, for example, as proposed above, would also ensure compliance with the non-discrimination requirement of Article 4 of the Directive.