

Revision of the Directive on Weights and Dimensions –

Joint views of Finnish Industries EK, Finnish Enterprises, Finnish Forest Industries and FinMobility

First of all, we would like to express our gratitude that the Commission's objective is to maintain the full right of Member States to decide on the weights and dimensions for national transport in their own territory. This is of paramount importance for the Finnish economy, businesses and the logistics sector.

However, besides this we want to emphasize that when renewing rules on transports between EU Member States, existing practices must be carefully considered. Neighboring countries Finland and Sweden have allowed higher weights and dimensions in bilateral traffic, forming a well-functioning single market for example in raw-wood acquisition. It is essential that the legal framework continues to provide full certainty for operations and investments of all stakeholders. Therefore, cross-border operations between neighboring countries should continue to be allowed under bilateral agreements with combinations larger than the general weights and dimensions, and such flexibility on the dimensions and weights should not be tied to a specific propulsion technology and should remain technology-neutral.

In parallel we would like to highlight that the current rules on weights and dimensions make it possible to transport goods loaded in two combinations of vehicles instead of three. This possibility is also in cross-border transports to and from our western EU neighbor Sweden. Making road transport more sustainable requires that more freight is moved with less emissions. Restricting or preventing the current practices would thus also mean a huge step backwards in the energy efficiency and environmental friendliness of transports between our countries.

It is important to recognize that, in addition to the heavy-duty vehicles used for transport, Finland's entire logistics system and network has been adapted to the larger dimensions and masses, covering the whole transport market in all sectors of the economy. This also applies to our links with our EU neighbor Sweden for bilateral transport. What comes to the different modes of transporting goods, the proportion of freight by rail in Finland is one of the highest in the EU. The EU rail market monitoring report indicates that proportion of freight by rail is 28%, while the EU27 average is 19%. The same report indicates that from 2015 to 2018 the modal share of rail increased in Finland despite that the national weight limit was raised to 76 tonnes in 2013. The two transport modes therefore do not compete against each other, instead they both contribute to making transports more efficient.

Last, but by no means least, the use of additional dimensions and weights for transport between Member States is also, to a large extent, a security of supply issue. It guarantees access for citizens and industry to essential commodities and raw materials, especially in the particularly sparsely populated northern regions where there are no alternative modes of transport. The importance of Finland's western border traffic has increased substantially since the 1300 km long eastern border between Finland and Russia has practically closed.

The Finnish experience has proven heavier and longer vehicles to be an effective tool for greener and safer road transport. Higher national limits have increased energy-efficiency gains and lowered fuel use in for example the forestry sector by up to 20% since year 2013. Alone in the forestry this has reduced cargo loads by more than 25% on the national roads (Metsäteho 2020ⁱ). A return to the use of small combinations would mean, at worst, a doubling of both the fleet and the number of drivers.

ⁱ <https://metsateho.fi/wp-content/uploads/Raportti-258-Puutavara-ja-hakeajoneuvojen-massojen.pdf>

We thank you for your consideration. Please do not hesitate to contact us for further information:

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