

Weights and Dimensions Directive – position paper by Finnish Forest Industries Federation (FFIF)

Higher weights and dimensions are the solution, not the problem

Let's face it, more freight needs to be moved with less emissions in Europe. With northernmost factories in the EU, Finnish forest companies have ages ago tackled this problem to operate in remote and sparsely populated territories with no existing rail connections and unprofitable to build.

30 years of development work has resulted in longer and heavier trucks made to serve certain geographical conditions and industrial needs. The results achieved speak for themselves:

- Energy-efficiency of wood trucks has increased by almost 20% since year 2013 when the national weight limit of 76 tonnes came into force (previously 60 tonnes).¹
- In the forestry sector alone, the amount of cargo loads on national roads has reduced by 25% since 2013.²

Energy-efficiency gains are the low-hanging fruit for reducing the carbon footprint of road transport in Europe. The Weights and Dimensions Directive should incentivise all CO₂ savings also via low-emission vehicles and energy-efficiency gains. Alternative fuels and zero-emission technologies for heavy-duty vehicles are yet developing and more needs to be done for their uptake, where the lack of technological maturity increases the cost of available solutions.

Let's not try to fix what is not broken

We agree that free movement of goods and fair conditions of competition in the single market need to be ensured by removing unnecessary regulatory barriers, but not introducing new barriers where things are fine.

The northern parts of Finland and Sweden have evolved into a vast joint wood acquisition territory, with free movement of goods and well-working cross-border practices. Over 16 000 wood trucks cross the border annually in areas where general traffic count is low and thus rail connections are unprofitable to build. The amount of wood cargo over the border is about to double due to new investments in northern Finland.

If the Commission proposal is not amended, we are, however, facing a situation where wood trucks used on both sides of the border will no longer be allowed to cross. Only 1 km long border-crossing stretch would require a totally other truck fleet built by EMS standards which do not consider the specificities of forestry and wood transportation. At the border trucks will have to be unloaded, uploaded to smaller vehicles, and then once again unloaded and uploaded to bigger vehicles after the crossing. This is not good internal market practice and neither it benefits the environment.

The legal framework must continue to give certainty for investments in cases where neighbouring countries have allowed higher weights and dimensions. In duly justified cases we must be able to supplement the legal framework.

¹ Palander&al, 2020, page 13: [Sustainability | Free Full-Text | Comparison of Energy Efficiency Indicators of Road Transportation for Modeling Environmental Sustainability in "Green" Circular Industry \(mdpi.com\)](#)

² Venäläinen&Poikela, 2022, page 13: <https://www.metsateho.fi/wp-content/uploads/Tuloskalvosarja-2023-11-Impacts-of-Higher-Vehicles-Weights-on-Timber-and-Chip-Transportation-in-Finland.pdf>

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There is a practical solution

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 between Finland and Sweden since countries joined the EU (1995).

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 those 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.

Finland needs its only remaining land border to work well

Russia's war in Ukraine has seized all wood imports from Russia and de facto eliminated Finland's longest land border (picture 1). Finnish companies rely on working cross-border practices to the western neighbours as the only Finnish land border left is between Lapland and the northern parts of Sweden and Norway. With a population density of 2 people per km² Lapland on its own is bigger than the Benelux countries altogether (picture 2).

We need practical solutions for the EU as "one size fits all" does not work in different parts of Europe due to geographical conditions and business/industry needs. The reasoning behind the current practices needs to be understood not to create unnecessary regulatory barriers.

Picture 1: Land border between Finland and Sweden is 614 km long.



Picture 2: Region's population density is only 2ppl/km², geographically the area is bigger than all Benelux countries together.

