

**Revision of the Weights & Dimensions Directive:
Warning call by UTPF and VDV
on behalf of French and German rail freight sectors**

As national associations representing the French and German railway operating communities, UTPF and VDV express their serious concerns regarding the potential consequences of the revision of the Weights and Dimensions Directive which is currently being discussed by EU legislators in the framework of dialogues.

If not improved at this stage, this piece of legislation will have detrimental effect on the rail freight sector in addition to all the negative externalities it will generate for our societies.

As Rail freight is the only transport mode capable of moving vast volumes of goods on a regular and reliable basis while supporting climate targets and advancing sustainable mobility policies, the European Commission has rightly set itself the target of increasing rail freight traffic by 50% by 2030 and doubling its modal share by 2050¹. To achieve this, it is crucial that the EU supports rail and multimodal freight transport solutions instead of building a legislative framework that favours road transport alone.

In line with the recent joint statement from the European rail sector², UTPF and VDV would like to elaborate on their French-German perspective and highlight the five major risks entailed by the ongoing revision of the Weights & Dimensions Directive:

1) Reverse modal shift and unfair competition

The widespread authorisation of heavier trucks – including 44-tonne vehicles and European Modular Systems (EMS/mega-trucks) – **would generate a heightened risk of reverse modal shift from rail towards road**, as acknowledged by the Commission in its impact assessment³. By significantly increasing the attractiveness of road freight transport, such measures would come at the expense of rail and therefore contradict the political objectives of the European Commission listed above.

UTPF and VDV also warn of distortions of competition arising from inadequate and uneven enforcement. While rail freight is subject to systematic and stringent checks, road transport controls on weight and dimensions remain sporadic and limited. Without a substantial strengthening of control mechanisms, any ambition to facilitate road transport risks further undermining the balance between transport modes.

¹ Sustainable and Smart Mobility Strategy, 2020

² Joint Statement - EU Citizens express strong opposition to the deployment of EMS on European roads, February 2026

³ Impact Assessment report of the European Commission - Chapter 6.1.5

2) More emissions for a disastrous climate impact

When the European Commission presented the *Greening Freight Transport Package* in 2023, it promised “greater economic gains with lower environmental impact.” Simplifying cross-border rules for heavier trucks might deliver economic gains for road transport but its impact on reducing the environmental footprint of logistics is likely to remain limited. **Any induced shift from rail back to road would be a climate setback, considering rail’s clear environmental advantages.** A single freight train can replace up to 45 trucks, making rail six times more energy-efficient than road transport and producing far fewer emissions, with around nine times less CO₂ and eight times fewer harmful particles⁴.

3) Massive damages on road infrastructures

Further strengthening the economic attractiveness of end-to-end road haulage by heavy goods vehicles would accelerate the deterioration of road infrastructure, leading to more roadworks and congestion. At a time when the investment needed to renovate Germany’s and France’s ageing road and bridge infrastructures is immense, higher truck weights would place an immediate additional strain on the road networks, driving renovation costs even higher for decades to come.

4) Safety at risk on European roads

Safety considerations are paramount as the risk of accidents in road freight transport is approximately 40 times higher than in rail transport. Increasing the weight of trucks may further exacerbate the risk of fatal accidents in the event of a collision. Longer and heavier vehicles may require revised specifications for clearance times and stopping distances in front of critical or hazardous road infrastructure, including level crossings with barriers, where they may increase safety risks for both road and rail transport.

5) Incompatibility with combined transport

For combined transport purposes, all derogations must be compatible with rail freight. However, UTPF and VDV recall that the current European road vehicle fleet is still poorly suited to conventional combined transport and warn that this rail-road incompatibility will be exacerbated by longer trucks, aerodynamic devices and high-capacity containers. Any further increase in vehicle dimensions and weights must not result in costly knock-on adaptations in rail transport, such as changes to container standards, or more complex train loading operations. **This is particularly relevant in the context of military transport,** which demands highly effective and efficient transport chains and multimodal networks, including cross-border movements.

For many of these reasons, it appears that, beyond rail freight professionals, **European citizens themselves are against introducing and facilitating the traffic of heavier trucks on European roads.** This is clearly demonstrated by the results of a European survey on mega trucks-perception conducted by Toluna Harris Interactive in 2024 (among 8 000 respondents in 9 Member States including France and Germany)⁵. This finding is confirmed by another recent EU-wide perception survey, which was conducted across all 27 Member States and found that 2% of respondents support the cross-border circulation of longer and heavier trucks⁶.

⁴ Rail freight forward, *30 by 2030 - Rail Freight strategy to boost modal shift*, 2020

⁵ *Megatrucks perception survey*, conducted by Toluna et Harris Interactive on behalf of Rail Logistics Europe, May 2024

⁶ *EU Survey Perception of Rail Freight in Europe*, conducted by Polling Europe, November 2025

Considering the major risks listed above and based of the respective positions adopted by the European institutions, UTPF and VDV make a series of key messages addressed to legislators in the framework of the ongoing trilogues.

- **UTPF and VDV welcome the Commission’s proposal to condition cross-border circulation of trucks exceeding authorised weight limits on the performance of intermodal transport operations (Article 4b).** UTPF and VDV call for this provision to be included in the final text.
- **UTPF and VDV welcome the Council’s adoption of a provision allowing Member States to refuse border crossing of trucks exceeding normally permitted weight limits (including 44-tonne vehicles) if they are not zero-emission (Article 4b amended by the Council).** Some additional infrastructure costs on road infrastructure would be politically more acceptable if they are at least done in pursuit of an overall decarbonisation objective. UTPF and VDV call for this provision to be included in the final text.
- **UTPF and VDV welcome the European Parliament’s introduction of a “*prior assessment of the possible impact of European Modular Systems on road safety, on the road infrastructure, on modal cooperation, as well as the environmental impacts of European Modular Systems on the transport system, including the impacts on modal split*” (Amendment 26 of the European Parliament).** This complements the ex-post monitoring system of EMS impacts provided for in the Commission’s proposal. UTPF and VDV call for this provision to be included in the final text. **VDV and UTPF also call for the establishment of common European rules for ex-ante EMS impact assessments by the European Commission through delegated acts,** as proposed by the European Parliament (Amendment 28, Article 4(5b)).
- **The extension of dimensions and weights in road freight transport must not impair compatibility in multimodal transport,** especially with regard to the potential withdrawal of the Combined Transport Directive that was supposed to go hand-in-hand with the revision of the Weights & Dimensions Directive.