

## Intermodal freight requires a coherent framework on weights and dimension

Following the Council's formal adoption of its general approach on the Weights and Dimensions Directive (WDD) amendment in December 2025<sup>1</sup>, the trilogue negotiations between the European co-legislators have started. The objective should be to identify a balanced compromise that (1) accelerates the decarbonisation of freight transport through the deployment of Zero-Emission Vehicles (ZEVs), (2) harmonises the rules for longer and/or heavier trucks in cross-border operations by introducing the European Modular Systems (EMS) concept and (3) facilitates an increased use of intermodal alternatives, in particular by using electric rail freight.

In these negotiations, a key challenge will be to avoid the adoption of amendments that further reinforce the already dominant position of unimodal road haulage through the artificial reduction of operating costs under the pretext of decarbonisation. In this context, the intermodal sector calls for a fair level-playing field supported by coherent, effective and proportionate measures. This position paper outlines the key considerations towards the European co-legislators to integrate into the trilogue compromise.

### Key considerations

- **The Greening Freight Transport Package must remain a single and coherent framework.** Intermodal interoperability and compatibility should be mandatory requirements in the WDD, and intermodal-specific provisions should be fully integrated into the revised CTD to ensure a fair and balanced regulatory ecosystem for all modes of land transport.
- **The proposed incentives in the WDD must target only zero-emission vehicles and intermodal freight transport.** UIRR supports a weight allowance for zero-emission road vehicles of up to 4 tonnes with axle-based differentiation, ensuring payload parity with diesel vehicles, while preventing future weight savings from increasing the maximum permitted payload. No transitional benefits should apply to fossil-fuel powered vehicles. Cross-border truck gross weight limit should remain at 40 tonnes, while intermodal freight transport should be harmonised to 44 tonnes for all loading units and axle combinations.
- **European Modular Systems (EMS) reduce intermodal attractiveness.** Facilitating their cross-border operations risks undermining intermodal freight transport, potentially causing a reverse modal shift of up to 21% for conventional rail freight and 16% for combined transport. Due to operational challenges at terminals, UIRR calls for consistent compatibility, permitting only standardised configurations, and requiring Member States to conduct ex-ante and ex-post assessments that extend to the impact on combined transport. An EMS-positive road network should be defined by each Member State allowing the circulation of such vehicles.
- **Single public national access points (NAPs) and an EU-level information portal should be established.** NAPs are the authentic harmonised sources for information on maximum allowed vehicle weights, dimensions, EMS configurations, and infrastructure restrictions, including conditions for zero-emission vehicles. A central European information portal should complement NAPs by aggregating national data and supporting interoperability for cross-border operations.

<sup>1</sup> More information on <https://www.consilium.europa.eu/en/press/press-releases/2025/12/04/council-sets-position-on-maximum-weights-and-dimensions-for-road-vehicles/>

## **Towards a coherent Weights and Dimensions framework for intermodal freight**

### **1. The Greening Freight Transport Package must remain as a single, coherent framework**

When the Greening Freight Transport Package was presented in summer 2023, the European Commission promised “more economic gains with less environmental impact”. UIRR reminds that the proposal on weights and dimensions was meant to go hand in hand with the revision of the Combined Transport Directive. Achieving a positive and ambitious result in that revision was – and remains – essential to ensure that all land transport modes become more efficient, contribute to more sustainable European logistics, and support the EU in meeting its Clean Industrial Deal targets by incentivising rail and intermodal freight transport solutions.

#### **a. Intermodal interoperability and compatibility must be a mandatory requirement in the WDD**

European logistics operates as an integrated system. Any modification of the WDD must guarantee compatibility between road components, rail and waterborne freight systems, including rolling stock and vessels, as well as their technical, operational and transshipment parameters. The broad consensus on the importance of intermodality and the significant investments in rail and terminal infrastructure would be undermined by changes to the dimensions of admissible road combinations that are not compatible with intermodal freight requirements, particularly where rail is involved.

#### **b. Integration of intermodal-specific aspects into the revised CTD**

The revised CTD should include provisions for intermodal freight transport reflecting its specific operational, regulatory, and liability needs. This integration would help avoid regulatory gaps, reduce uncertainty for the intermodal community, and promote Europe-wide harmonised implementation across all transport modes, while preserving the integrity and objectives of the revised CTD framework. UIRR calls for a harmonised maximum weight framework for intermodal operations: 44 tonnes for all intermodal loading units (semi-trailers, swap bodies and tank containers) and for all axle configurations (2 or 3 axle-combination for the traction unit and 2 or 3 axle-combination for the (semi)-trailer).

### **2. WDD Incentives must target only zero-emission vehicles and intermodal freight transport**

The proposed WDD amendments include incentives for road transport to encourage investment in zero-emission technologies. These incentives include compensation for the additional weight of these technologies. UIRR supports granting ZEVs a weight bonus of up to 4 tonnes. The weight allowance should ensure payload parity with diesel-powered vehicles; any future weight savings from lighter technologies should be prohibited from being used to increase payload. UIRR also accepts that ZEV technologies may require up to 90 cm of additional space on the traction unit.

E-semi trailer technology or the electrification of semi-trailers with an integrated electric motor, battery, and e-axle to assist the tractor result in a significant reduction of fuel consumption and harmful emissions. UIRR supports an additional weight allowance of up to 2 tons under the condition that these e-semi-trailers remain fully compatible with intermodal freight wagons. The findings of the European project ZEFES (<https://zefes.eu/>) are particularly relevant as the project will conduct a live test with a truck combination using an e-semi trailer.

While fossil-fuel vehicles may remain temporarily permitted, the WDD should establish a clear transition program that incentivises the shift towards zero-emission commercial road vehicles. During this phase, no transitional benefits should be granted to fossil-fuel vehicles, and their maximum road weight limit in cross border operations should remain at 40 tonnes, while intermodal freight transport should be harmonised to 44 tonnes for all loading units and axle combinations.

### 3. European Modular Systems (EMS) trucks reduce intermodal attractiveness

In a market highly sensitive to cost, any facilitation of the cross-border operation of European Modular Systems (EMS) trucks will make intermodal freight transport less attractive. EMS configurations consist of modular units that may form longer (and heavier) vehicle combinations. National trials under way presently include variations in lengths of up to 25,25 m or even 32 m in some cases.

The authorisation of EMS may lead to a reverse modal shift of up to 21% on average for rail freight and 16% for Combined Transport. This would result in up to 13,3 million additional truck journeys, 6,6 million tonnes of additional CO<sub>2</sub> emissions, and a tripling of external costs in Europe every year. In addition, the use of EMS combinations on CT road legs is predominantly not suitable, as these EMS trucks are considerably more complex and require more cumbersome transport planning by terminals and freight forwarders.

Another challenge and a potential cause of incompatibility for EMS vehicle combinations is the fact that terminals are often reachable from secondary roads, which do not necessarily meet the requirements in terms of tractrix curves and manoeuvrability for longer EMS trucks. Additionally, longer parking spaces are often unavailable on terminal sites specifically if they are located in dense urban areas or industrial environments. In a consultation with UIRR terminal managers, almost half of the terminals stated that access, on site movement, or parking on the terminal premises would not be possible with longer EMS vehicles.

In this context, UIRR calls for the strict application of the principle of 'intermodal compatibility' to all EMS truck configurations. Such configurations should be permitted only when based on standardised intermodal dimensions, such as the use of two standard semi-trailers in the EcoDuo concept. In addition, the Member States should be required to perform an ex-ante assessment to evaluate the potential impact of authorising the use of EMS trucks within their territories. Such an assessment should cover road safety impacts, infrastructure effects, environmental impacts, and potential risk to modal shift. A similar ex-post assessment should follow within a year after implementation. Finally, Member States must be requested to establish an EMS-positive network that legally defines the sections of roads where EMS vehicles may operate. Only the roads explicitly included in this network should be authorised for EMS circulation.

### 4. Establishment of single public national access points and an EU-level information portal

UIRR strongly supports the creation of a National Access Point (NAP) in every Member State as a key element in the implementation and enforcement of the WDD. NAPs should serve as the official source of information related to vehicle weights, dimensions, and EMS operations and published in a harmonised readable format. Each NAP should include (1) national and cross-border weight and dimension limits, (2) the authorised EMS configurations, and (3) the legally defined EMS positive network. In addition, NAPs must also provide detailed infrastructure restrictions, such as bridge load limits, height constraints, and access routes to intermodal terminals, along with any conditions applicable to zero-emission or alternative-fuel vehicles.

UIRR also supports the creation of a central European information portal to complement NAPs by offering a single, harmonised interface to inform cross-border operators on the constraints imposed by each Member State. This portal should aggregate data from all NAPs, enforce common technical standards, and guarantee interoperability across Member States, and could later be extended to incorporate the CTD-related national rules as well.