



## Resolution

### **The European Commission's proposal for an amendment by the European Parliament and the European Council of Directive 1999/62/EC on the charging of heavy goods vehicles for the use of certain infrastructures, COM (2008) 436**

On July 7, 2008, the European Commission put forward a package of new "Greening Transport" initiatives which include a proposal to revise the so-called "Eurovignette Directive" on road pricing. The purpose of this new regulation is to ensure that the prices charged for the use of the roads better reflect the external costs caused by the transport of goods.

Accordingly, road tolls for heavy vehicles should in future include the costs for air pollution, noise and congestion attributable to road haulage. The costs of climatic change and CO<sub>2</sub> emissions will not be added to this calculation, since they can be internalised more appropriately by other means.

As in the past, the directive will apply only to the road haulage sector. The individual Member States will be free to levy the additional road tolls for the external costs as described above at their own discretion.

In connection with the proposal, the UECC demands the following:

- **No unilateral charge for one particular mode of transport – no unilateral charges for particular sections of one mode of transport**

All modes of transport must be included in the internalisation of costs. As long as an equal treatment of all modes of transport is not guaranteed, the UECC rejects additional tolls for the use of the roads.

All sectors concerned must be included in the calculation if the external costs are to be attributed correctly to their source. It is not acceptable to ascribe all these costs to the business community alone. Effects on the environment that are due to private households or agriculture are currently not taken into account.

In its justification of the proposal, the Commission confirms that only about a quarter of road traffic's negative impact is due to freight transport. It therefore does not make sense that the sector that is responsible for only a quarter of the external costs should be the only party to be charged with higher tolls.

- **The regulations should be applied in the same way throughout the European Union in order to avoid distortions of competition**

The proposal allows Member States a large degree of discretion. Great differences in the implementation of the measures to raise road tolls are therefore to be expected.

The business community has always advocated standardised regulations throughout the European Union in order to ensure a level playing field for all sectors of the economy.

- **External benefits and already paid taxes and fees must be taken into account**

Unfortunately, the proposed measures do not take into consideration the positive external effects of transport ("the external benefits"), as for example the direct and indirect creation of value added, a more comprehensive distribution of goods and services, a finer distribution of labour with the productivity gains it generates, etc. Focusing only on the negative effects produces a distorted picture of the overall impact of transport on the economy.

In addition, all the taxes and fees that have already been paid by the road users must be taken into account and deducted from the charges. Transport costs have increased considerably recently, owing to the high fuel prices.

- **No attribution of congestion costs exclusively to freight traffic**

The UECC thoroughly rejects the proposal to attribute congestion costs exclusively to commercial traffic. Congestion costs have already been internalised. The business community has to bear the expenses caused by delays and makes every effort to avoid them.

Companies often cannot schedule transports outside the peak traffic times owing to legal restrictions (traffic bans for trucks, etc.) and contractual obligations, such as delivery times that have to be met.

Moreover, traffic jams are usually caused by accidents, building sites and bottlenecks in the infrastructures. Freight traffic is only very rarely at fault, since congestion occurs primarily at times of heavy passenger traffic (commuter traffic in the agglomerations or tourist traffic during school holidays).

- **Clearly defined rules for the calculation and maximum limits for the individual cost factors**

The UECC welcomes the establishment of uniform calculation methods and maximum limits for all the relevant cost factors. The Commission thus provides a standard framework for the implementation of the measures throughout the European Union.

However, the UECC firmly rejects the proposal to double the costs of air pollution for mountain regions, or to increase the costs for noise pollution by a factor of five. This multiplication of road toll supplements would only create yet more differences between national road toll levels.

EU-wide standardised maximum limits for external cost factors are of particular importance. In this context, it must be clearly stated that the values listed in Appendix IIIa are the absolute maximum limits applicable for heavy utility vehicles.

- **No additional options for road toll supplements in mountain regions**

In principle, every mode of transport has to bear its own costs. Cross financing can only be accepted under special, precisely defined conditions.

The suggestion to levy toll supplements on alternative routes must be deleted from the proposal. There is no need to extend the current regulation on this subject, particularly since there is no sufficiently clear definition of the term "mountain regions".

On the other hand, the UECC demands that the European Commission's veto against the accumulation of external cost charges and toll supplements be upheld under all circumstances.

- **Investment of the funds into road infrastructures and the immediate reduction of negative effects**

Member States are given too much latitude with regard to the use of the income earned from the tolls. It is therefore likely that some governments will continue to reinvest these earnings in projects other than the maintenance and extension of road infrastructures.

External cost tolls will provide additional funds for technological advances and measures for an immediate reduction of the negative effects caused by road traffic. The UECC demands a more exact definition of the use of these funds.

The UECC is an association of 75 Chambers of Commerce and Industry from 11 European countries. It represents the interests of more than 2.5 million companies with regards to European transport policy.

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