



UNION EUROPÉENNE DES TRANSPORTEURS ROUTIERS

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EU Mobility Package

Eurovignette/Charging of heavy goods vehicles

UETR Position

INTRODUCTION

UETR is the European umbrella organization representing and defending the interests of more than 200.000 road transport undertakings (mostly Micro, Small and Medium Enterprises) from Western and Eastern EU Member States associations, with a total capacity of more than 430.000 commercial vehicles¹.

This document provides UETR position on the European Commission's proposal for Eurovignette Directive amending Directive 1999/62/EC on road charging of heavy good vehicles for the use of certain infrastructures and Proposal for a Directive amending Directive 1999/62/EC on the charging of heavy goods vehicles for the use of certain infrastructures, as regards certain provisions on vehicle taxation.²

THE EC PROPOSAL - UETR COMMENTS

User pays principle and distance, user rights

UETR welcomes the introduction of tolls depending on the distance travelled and emissions. We also support the phasing out of the time-bound usage rights (vignettes). Such vignettes do not comply with the "user pays" principle, and work hard for mobility or emissions

¹ Within the Union, 95% of the road haulage companies are micro-enterprises with less than 10 employees (small firms or one-man operations).

² COM(2017)0275 - TRAN/8/10069 and COM(2017)0276 - TRAN/8/10067

UETR believes the EC goes into the right direction in aiming to ensure fairer treatment of transport companies by eliminating the possibility of not applying tolls on lorries of less than 12 tonnes (equal treatment).

Light vehicles

UETR welcomes the proposal that a toll charge must also apply to all road users without distinction. Passenger vehicles must also fall within the scope of the levy, all road users must contribute to road charging, in full respect of the "user pays" principle.

External costs

UETR:

- the revision of the directive should not be misused to further increase costs. UETR does not support the fact that Member States where a levy is applied will have to introduce an external cost charge. Exactly due to a differentiation of the vehicle's Euro-standard tariffs, the external costs are now internalized to the maximum.
- opposes the handling of reference values instead of maximum values. It is important that the level of tariffs is reasonable and harmonized in order to avoid any shifts of (freight) traffic from one Member State to another - mainly in border regions.
- Potential internalisation of external costs at the economic level raises the issue of double taxation for businesses: on the one hand, the already internalized congestion costs (the working time spent in traffic jams, congestion, blocked goods ...) and on the other hand, the levy itself. In any case, it is clear that internalization will drive up the price of transport, which will ultimately be taken into account by the final consumer, thus affecting the entire economy.

Congestion charge

UETR does not support the introduction of maximum rates congestion charges. These are not acceptable and will make transport a lot more expensive.

In addition, such a tariff structure makes it much more difficult for a carrier to make exact tariff offers, and the customer will not accept unforeseen higher "peak rates". The carrier often does not determine his departure time himself. UETR also points out that, in many cases, carriers will not be able to enjoy a lower rate when the levy is put on a time basis. Transport operators avoid congestion today as often as possible due to logistical inefficiency. Due to limited loading and unloading at the customers and destinations, there is hardly any stretch. Avoiding the peak periods would mean that a truck has to wait hours before it can be loaded or unloaded. Logistics efficiency is threatened. Big clients may force carriers to drive in the "off-peak" (cheaper rate) while smaller companies can only be active during the day. As a result, vehicles (drivers) are threatening to lose many useful day hours.

Mark up

As an alternative to congestion tax, the European Commission proposes to allow increases (surcharges) in road charges that are regularly saturated or whose use of vehicles causes significant environmental damage. UETR does not support the proposal as it does not explicitly state that such surcharge should apply to all vehicles. Heavy vehicles do not make the biggest contribution to congestion or emissions. By not including the light vehicles, there is unequal treatment among operators in the transport and logistics sector. The requirement that the proceeds of a surcharge should be mandatory reinvested in a TEN-T project underlines

the need that LCV also fall under the mark up scheme (if applied) as they represent the vast majority of the vehicles used in the transport network.

Tariff variation in function of CO2

The EC proposes that no variation of the levy is based on the euro standard, rather the CO2 emissions from heavy commercial vehicles.

UETR:

- welcomes the approach but wants to make sure that companies will be allowed to invest in clean vehicles and sustainable energy and environmentally friendly technologies through incentives such as financial and tax incentives. In addition to technological innovations, changes in the organization of the supply chain such as widening of loading and unloading times and more efficient use of existing infrastructure can also be considered. This allows the carrier to avoid traffic-jams that reduce fuel consumption and reduce emissions. This will have a positive impact not only on the environment, but also on the costs of delays (reduced).
- Supports the maintenance of the Euro standard reference (currently phased out in the proposal).

Earmarking

UETR fully calls for the introduction of fullest and strictest earmarking: financial income from a toll charge must be reinvested in road infrastructure.

From the "user pays" principle derives that the financial income from a toll charge is reinvested to road infrastructure. UETR calls for investments increasing road infrastructure capacity, as this is the only realistic scenario in which the expected increase of goods and passenger traffic could also go hand in hand with a decline in congestion over the next 20 years. Reinvestment not only to maintenance and realization of current missing links, but also large-scale long-term projects.