

POSITION PAPER

The review of Directive 1999/62/EC ('Eurovignette Directive') as amended, on the charging of heavy goods vehicles for the use of certain roads and the review of Directive 2004/52/EC and Decision 2009/750/EC on the European Electronic Toll Services (EETS).

"Eurovignette"

CLECAT welcomes the intentions of the European Commission to amend the "Eurovignette" Directive in order to move towards distance-based charges, differentiated according to emissions, for all vehicles. This is in line with our long-standing position that road charging should reflect emissions performance and not discriminate against goods traffic.

We wish to draw attention to the following points with regard to the Commission proposal:

- The current rules on vignettes for heavy goods vehicles, and the absence of such rules for light vehicles and buses, often lead to situations of discrimination against non-resident drivers and HGVs and a diversion away from the tolled network. We therefore welcome the Commission's proposal to address this situation by expanding the Directive's scope to all vehicles, and ensuring that charges and tolls do not discriminate by nationality. The shift to a distance-based system is essential in order to properly account for the environmental impact of vehicles.
- All types of road vehicles (freight and passenger transport, heavy- and light-duty vehicles) should be included in the scope of EU road charging legislation. The proposal's scope is in line with this principle, and must be maintained. As logistics operators already pay for congestion due to the business costs incurred, charges must be limited in scope and duration, and applied in a non-discriminatory manner. CLECAT can only accept the additional burden of congestion charges, for example, if they are applied in a non-discriminatory manner to all vehicles.
- We support the proposal to extend the Directive's scope to other roads beyond the TEN-T. Tolls and user charges should apply to all infrastructures of European importance i.e. the main trade lanes of the TEN-T roads, motorways and national roads carrying significant international traffic
- It is vital that the maximum limit on charges be maintained, at a fair level, and that the provisions for external-cost charging, congestion charging and mark-ups are not exploited as a means to get around the maximum charge. To this end, clear, strict criteria for the use of these mechanisms must be enforced, including with regard to the period for which the charges are imposed.
- The conditions set out in the proposal appear to be a strong basis for discussions, and we oppose any weakening of these conditions while remaining open to their being strengthened further. The prevention of double-charging provided for in Article 7f(5) must be maintained, as well as the deduction of mark-ups from the external-cost charge as provided for by Article 7f(4).

- Strict reporting requirements are essential in order to guarantee transparency over the setting of charges and their justification, and as such to obtain the acceptance of users. The requirements of Article 11 should extend to mark-ups, in order to ensure consistency with other charges and full transparency. Applications to apply mark-ups and the Commission's related decisions should be made public.
- Strict ear-marking provisions are essential for the success of the charging framework. The Commission proposal to ear-mark revenues from congestion charging and mark-ups for investment in measures to relieve congestion and environmental damage is a welcome start, and should be extended to the full scope of the Directive.
- As congestion charging is permitted on any section of the Member State's road network, Member States should be able to use the revenues from congestion charging to eliminate bottlenecks wherever the charge is applied on their network, rather than only on the TEN-T as foreseen by the Commission proposal (Art. 7f(4), Art. 9).
- While we support the principle of moving to a charging framework based on emissions performance, it is essential that the level and variation of charges properly reflect true emissions performance as determined by accurate measuring and reporting. Furthermore, when imposing such charges, it must be borne in mind that the ultimate goal is to incentivise a shift to low-emission mobility, including investment in low-emission vehicle fleets.

Such investment is by definition only possible if businesses have adequate capital to invest. Therefore, introducing onerous charges at the wrong point in the investment cycle and without adequate time for operators to adapt, may lead to a devaluation of already high-standard vehicles. Such restrictions would therefore deprive forwarders and transporters, who already operate with narrow margins, of an essential source of capital used for acquiring new low-emission vehicles and as such reduce the overall effectiveness of the policy.¹

In this regard, however, the proposed Council Directive amending Directive 1999/62/EC, by allowing Member States to reduce vehicle taxation to offset the introduction of tolls and better incentivise cleaner, more efficient options, is a welcome and essential element of the legal framework on road charging.

European Electronic Tolling System

- CLECAT has always advocated that it is fundamental to implement an *interoperable and easy to use electronic system for collecting existing and future tolls and user charges*. This must be a prerequisite for the implementation of any new tolls and user charges in order to avoid disruption to the free flow of traffic and barriers to the Internal Market. While the EETS proposal would apply only to systems that *require* the installation or use of on-board equipment, such requirements should become generalised.
- The use of an interoperable electronic tolling system greatly simplifies operators' compliance with tolling systems across Europe, reduces the impact of tolling on supply-chain efficiency,

¹ See also CLECAT's [position paper on Sustainable Urban Logistics](#)



and facilitates wider digitalisation efforts based on interoperable digital technologies through common standards and platforms. This includes the use and acceptance of electronic transport documents and digital tachographs, as well as dynamic road pricing should this allow more reliable/shorter travel times in peak hours.