

The European Voice of Freight Logistics and Customs Representatives

Brussels, 10th of March 2011

RE: Position of the Council at first reading on the charging of heavy goods vehicles for the use of certain infrastructures (Eurovignette Directive) (2008/0147 (COD))

CLECAT represents European freight forwarders, logistics service providers and Customs agents, who are all neutral users of transport services in all modes of transport. Members of the EU Parliament are probably aware that CLECAT has expressed its views on the Eurovignette III proposal in repeated occasions, notably in 2008 at the hearing at the European Parliament¹. Now that the Council's position on the Eurovignette is adopted², CLECAT would like to briefly comment on the resulting proposal that is now with us, before the European Parliament completes its second reading.

Without reiterating the request for a different proposal that was expressed in the past, our message at this point in time is very simple: **Members of the European Parliament should not accept the Council position as is**, for the following three reasons:

1) Most external costs in road transport are internalised already by existing schemes: the only fair thing to do is then to harmonise them.

The charges levied on road transport, especially on freight vehicles, either completely cover the external costs or even contribute to a net profit even after external costs have been taken into account. This was the result of the CLECAT study (see note)³ that was published in October. Failing to take account of these results is tantamount to creating another layer of taxation, which will increase the pressure on an industry still without real alternatives, create inflation, and jeopardise the road haulage business, particularly smaller companies which will be most exposed.

2) Other modes of transport may find their way to greater efficiency, but not through a cost-price battle with the road sector

A pricing policy for the road sector should not be seen as a shortcut to a higher market share for other transport modes; this can only come through efficiency. In addition, internalising external costs through charging systems in road is only one aspect of a more holistic policy approach that should aim at reducing externalities in all transport modes. Other more constructive approaches

¹ <http://www.clecat.org/dmdocuments/pp021oetro081124ephearingeurovignette.pdf>

² <http://register.consilium.europa.eu/pdf/en/10/st15/st15145.en10.pdf>

³ <http://www.clecat.org/dmdocuments/pp010oetro101014eurovclecatexcerpt.pdf>

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and incentives than road pricing for freight only are possible and might be better suited to decrease the externalities of the road sector.

3) Road charging without strong earmarking is inefficient, unfair and damages EU cohesion

The impact of the internalisation policy is greater if the revenues are directly used to work on the reduction of externalities. CLECAT repeatedly stated that making users pay for externalities without working on their reduction would be unfair and counterproductive. Unfair because it creates a public interest in maintaining the source of the externalities and counterproductive because affects the continuity of the market by creating some conditions for a declining economy.

CLECAT hopes that Members of the European Parliament will take due consideration to these points during the second reading. CLECAT Members hope that the honourable EP members will rather let this proposal fall and ask the Commission to prepare a more constructive proposal, rather than agreeing on a text that no longer contain any of the few principles of an effective internalisation of external cost that were remaining after the first reading.