

# Review of Directive 1999/62/EC ("Eurovignette") as amended, on the charging of heavy goods vehicles for the use of certain roads

Fields marked with \* are mandatory.

## Section A: Respondent Details

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\*1. Are you replying as/on behalf of:

- Private person
- Road transport worker (e.g. driver)
- Company engaged in transport/logistics activity
- Non-governmental organisation/association
- Public authority (e.g. national transport regulator, national competition authority)
- Non-EU public authority
- Academia
- Other (please specify)

\*1.3 Please specify which interests/stakeholders your association/organisation represents:  
(only if you answered "Non-governmental organisation/ association")

- Consumers or citizens
- Road transport workers
- Road freight transport operators
- Road passenger transport (i.e. coach, bus and taxi)
- Freight forwarders
- Shippers
- Rail transport
- Intermodal transport
- Other mode of transport (please specify)
- Other

\*1.4 How many members does your association or organisation represent?

*(only if you answered "Non-governmental organisation/association")*

*100 character(s) maximum*

48 Members and 8 Support Organisations

\*1.6 Please specify the name of the authority/association/company/organisation you represent

*(only if you answered "Public authority", "Non-EU public authority", "Non-governmental organisation /association" or "Company engaged in transport/logistics activity")*

*100 character(s) maximum*

Transport & Environment

\*2. Is your organisation registered in the [Transparency Register](#) of the European Commission and the European Parliament?

Yes

No

\*If yes, please indicate your organisation's registration number in the Transparency Register.

If you are an entity not registered in the Transparency Register, please register in the [Transparency Register](#) before answering to this questionnaire. If your entity responds without being registered, the Commission will consider its input as that of an individual in his own capacity.

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\*3. What is your country of residence? In case of legal entities, please select the primary place of establishment of the entity which you represent.

Belgium

\*Please indicate your postal code

*100 character(s) maximum*

1050

\*4. Please indicate your contact details (name, email).

Please note that you can only fill in the questionnaire if your name and contact details are provided. You can still opt for your answers to remain anonymous when results are published.

*100 character(s) maximum*

Samuel Kenny, samuel.kenny@transportenvironment.org

\*5. Do you consent to the publication of your response by the European Commission?  
Contributions received may be published on the Internet, together with the identity of the contributor, unless the contributor objects to the publication of personal data on the grounds that such publication would harm his or her legitimate interests. In this case, the contribution could be published in anonymous form.

- Yes
- Yes, but anonymously
- No

## Section B: General questionnaire

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### B.1 Identification of the problems

The purpose of the questions in this section is to verify the existence and, where applicable, importance of the issues identified by the Commission at this stage, and to identify any possible additional problems which have not been considered yet.

#### B.1.1 Infrastructure quality

Recent experience in several EU Member States and a number of studies indicate a decline in spending on maintenance of the road infrastructure and thus in the surface quality of existing roads (even though the length of the network might have increased in some countries through investment in new infrastructure). Financing of the road infrastructure through taxes (conventional fuel and vehicle taxes) may become more and more difficult with ever more efficient vehicles, the introduction of alternative fuel technologies and lower levels of car ownership among younger generations coupled with the expansion of ridesharing and alternative mobility services.

\*Please answer the following questions for the EU in general and for a country of your choice (you know best):

This selection will also apply to other questions later on in the questionnaire:

Section B.1.1: questions 1, 2, 3 & 4

Section B.1.2: questions 9 & 10

Section B.1.3: question 11

Section B.1.4: question 12

Section C.1.1: questions 1 & 2

Belgium

\*1.a How would you rate the **quality of toll roads** (where a toll or user charge is to be paid) in the **country you selected** under B.1.1 ?

- Very badly maintained
- Rather badly maintained
- Rather well maintained
- Very well maintained
- I don't know / no opinion

\*1.b How would you rate the **quality of toll roads** (where a toll or user charge is to be paid) in the **EU in general**?

- Very badly maintained
- Rather badly maintained
- Rather well maintained
- Very well maintained
- I don't know / no opinion

\*2.a How would you rate the **quality of free roads** in the **country you selected** under B.1.1 ?

- Very badly maintained
- Rather badly maintained
- Rather well maintained
- Very well maintained
- I don't know / no opinion

\*2.b How would you rate the **quality of free roads** in the **EU in general**?

- Very badly maintained
- Rather badly maintained
- Rather well maintained
- Very well maintained
- I don't know / no opinion

\*3.a In your view has the quality of **toll roads** changed over the last 10 years in the **country you selected** under B.1.1 ?

- Yes, the quality of toll roads has deteriorated significantly
- Yes, the quality of toll roads has slightly deteriorated
- No, the quality of toll roads has not changed
- Yes, the quality of toll roads has slightly improved
- Yes, the quality of toll roads has improved significantly
- I don't know / no opinion

\*3.b In your view has the quality of **toll roads** changed over the last 10 years in the **EU in general**?

- Yes, the quality of toll roads has deteriorated significantly
- Yes, the quality of toll roads has slightly deteriorated
- No, the quality of toll roads has not changed
- Yes, the quality of toll roads has slightly improved
- Yes, the quality of toll roads has improved significantly
- I don't know / no opinion

\*4.a In your view has the quality of **free roads** changed over the last 10 years in the **country you selected** under B.1.1 ?

- Yes, the quality of free roads has deteriorated significantly
- Yes, the quality of free roads has slightly deteriorated
- No, the quality of free roads has not changed
- Yes, the quality of free roads has slightly improved
- Yes, the quality of free roads has improved significantly
- I don't know / no opinion

\*4.b In your view has the quality of **free roads** changed over the last 10 years in the **EU in general**?

- Yes, the quality of free roads has deteriorated significantly
- Yes, the quality of free roads has slightly deteriorated
- No, the quality of free roads has not changed
- Yes, the quality of free roads has slightly improved
- Yes, the quality of free roads has improved significantly
- I don't know / no opinion

5. If road quality is a problem, what in your opinion are the consequences of the issue and how would you rate their significance?

	High	Moderate	Low	No opinion / don't know
Increased vehicle operating costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increased journey times	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Higher discomfort of journeys	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Higher risk of accidents	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
More noise	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Any other?

*100 character(s) maximum*

## B.1.2 General questions on taxes and charges in the area of road transport

Motorists pay a number of different taxes: fuel tax (in all countries), vehicle taxes including registration tax (in about 20 out of 28 EU Member States for cars; only 4 countries apply such tax for lorries (heavy goods vehicles with a total permissible laden weight above 3.5 tonnes)) and annual ownership or circulation tax (in 24 countries for cars; and in all countries for lorries as it is a requirement of the "Eurovignette" Directive). The levels of these taxes may however differ a lot from one country to the other: e.g. the registration tax of a mid-sized car in Denmark is around €30.000 while there is no such tax in Germany; the registration of a modern 40-tonne lorry costs €6.000 in Greece while there is no such tax in most other countries. Annual taxes also differ a lot, in some cases by over €3.000 for the same type of lorry.

Some of the revenues from these taxes may be used to build/maintain roads but often they go to the general budget of the country, and are thus not necessarily spent on maintaining transport infrastructure.

At the same time road charges (time-based vignettes or distance-based tolls) are applied in many countries for the use of certain parts of the network. For lorries, such charges are applied on about 20-25% of the motorway and other main road network in Europe. Again, the prices charged for similar roads/routes can be very different even between neighbouring Member States. Most Member States apply road charges to lorries over 3.5 tonnes, but some exempt those weighing less than 12 tonnes. All these can distort competition among hauliers and may lead to the diversion of traffic to alternative free roads that are not always designed for heavy traffic, with additional negative impacts on the local environment.

While in a number of countries most of the revenues from road charges are reinvested in transport, they represent only about 10% of the cost of road infrastructure, the rest of which has to be financed from other sources (like the general budget).

In addition, road charges – or the lack thereof – rarely reflect real cost related to road use: infrastructure, air pollution, noise, climate change or accidents. A large part of these costs, representing a few % of the Gross Domestic Product (GDP) in the EU, are borne by society (tax payers or those suffering from negative effects of road transport) and not by the user/polluter.

\*6. Do you think that existing differences in transport taxes and charges across Member States can favour or disadvantage certain road users (e.g. citizens of different nationalities, occasional road users)?

- Fully agree
- Rather agree
- Rather disagree
- Fully disagree
- Don't know / No view

\*7. How do you, **as a road user**, assess the level of road charges paid for the use of roads compared to the quality of the service?

- In general fees are too high
- In some cases fees are too high
- In general fees are adequate
- In some cases fees are too low
- In general fees are too low
- Difficult to assess/ Don't know

\*8. In your opinion, is there a problem of traffic diversion to parallel roads due to road charges?

- Not at all
- To some extent
- Yes, it is a significant problem
- Yes, it is a very significant problem
- Don't know / No view

- \*9 How do you assess the **price paid**, in the form of road charges, **by heavy goods vehicles** (HGVs) for their use of roads (road space) and damage (road damage, air pollution, noise, accidents) they cause in your area/country (in line with the 'user pays' and 'polluter pays' principles)?

*The 'polluter pays' principle is set out in the Treaty on the Functioning of the European Union (Article 191 (2) TFEU), and is recognised in international conventions and national laws. It means that those who cause environmental pollution should cover the environmental costs attributable to their operations or consumption (e.g. air pollution caused by vehicles or recycling costs of plastic bags). The 'user pays principle' means, by analogy, that the user of an infrastructure should cover a proportionate part of the costs related to the maintenance (and construction) of that infrastructure. Both are considered to be fair ways of allocating costs that would otherwise be borne by society at large (tax payers), including by those who never make use of the given infrastructure or do not cause pollution.*

- The price paid by HGVs is much too high
- The price paid by HGVs is a bit too high
- The price paid by HGVs is adequate
- The price paid by HGVs is a bit too low
- The price paid by HGVs is much too low
- I don't know / no opinion

- \*10. How do you assess the **price paid**, in the form of road charges, **by light vehicles** (motorcycles, passenger cars and light goods vehicles (with total permissible laden weight up to 3.5 tonnes)) for their use of roads (road space) and damage (road damage, air pollution, noise, accidents) they cause in your area/country (in line with the 'user pays' and 'polluter pays' principles)?

- The price paid by light vehicles is much too high
- The price paid by light vehicles is a bit too high
- The price paid by light vehicles is adequate
- The price paid by light vehicles is a bit too low
- The price paid by light vehicles is much too low
- I don't know / no opinion

### B.1.3 Vignettes



Road user charges in the form of vignettes are paid in function of the time period the vignette gives access to the use of a certain part of the road network. The prices thus do not depend on the actual distance driven, which makes it relatively cheap for the regular user but can be disproportionately expensive for the occasional user (possibly using just a short section of the charged network for a very short period of time).

For heavy goods vehicles (lorries), the "Eurovignette" Directive requires that short-term vignettes (daily, weekly, monthly) are available and priced in proportion to the duration while taking administrative costs into account: "*the monthly rate shall be no more than 10% of the annual rate, the weekly rate shall be no more than 5% of the annual rate and the daily rate shall be no more than 2% of the annual rate.*" Such clear definition does not exist for passenger cars, buses (Vehicles designed to carry at least 8 passengers in addition to the driver) and light goods vehicles.

This may result in an inconsistent application of the 'user pays' and 'polluter pays' principles, and potential disadvantage to the occasional user, especially in the case of cars and vans, where daily vignettes do not exist and the prices of short-term vignettes may be relatively high.

\*11.a How do you assess the prices of short-term vignettes (weekly or monthly) for cars and vans, especially in comparison to long-term vignettes in the **country you selected** under B.1.1 ?

- Disproportionally high
- Rather high
- Adequate
- Rather low
- Disproportionally low
- I don't know / No view

\*11.b How do you assess the prices of short-term vignettes (weekly or monthly) for cars and vans, especially in comparison to long-term vignettes in the **EU in general**?

- Disproportionally high
- Rather high
- Adequate
- Rather low
- Disproportionally low
- I don't know / No view

#### B.1.4 Congestion

Road congestion represents a huge economic loss to society (loss of time, travel time reliability, increased fuel consumption and pollution) not only in urban areas but also in the inter-urban road network in many European countries. Several studies have investigated the issue and the cost of congestion is estimated to be between 1-2% of GDP in the EU.

12. In your opinion, is road congestion a problem?

	Not at all	To some extent	It is a significant problem	It is a very significant problem	Don't know / No view
*in your area of residence/establishment (A.3.postal code)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*in the country you selected under B.1.1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*in the EU in general	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

B.1.5 Possible additional issues

13. Do you see other problems related to road infrastructure charging that may need to be addressed at EU level?

1500 character(s) maximum

There is a significant problem of fragmentation across Europe whereby some countries apply vignette systems, some countries apply distance-based systems with physical barriers and others apply distance-based electronic systems. It has been shown in the Commission's own evaluation of Directive 1999/62/EC (performed by Ricardo AEA) that distance-based electronic systems are the most effective at making road haulage more efficient and to motivate the uptake of cleaner vehicle technology. It is for this reason that the Commission should consider phasing out vignette systems which are not a true reflection of the journey that a truck performs. Furthermore, vignettes provide less revenue to national governments so are a poor mechanism to internalise the external costs of trucks. The Commission should also allow member states to account for Greenhouse Gas emissions in their tolls. Road transport is the cause of significant amounts of emissions that lead to climate change. If Member States were able to differentiate their tolls based on the Greenhouse Gas emissions from trucks then this could promote the uptake of cleaner vehicles and cleaner vehicle technology. Furthermore, the legal enabling of such differentiation would allow countries to use tolls to further reach their own climate targets. The ability to do so should not be limited by Directive 1999/62/EC.

B.2 The role of the EU

The European Union has a transport infrastructure policy to connect people and markets across the continent. It aims to level out differences in Member States' transport networks and remove bottlenecks by providing financing for the completion of the Trans-European Transport Networks (TEN-T) including major transport corridors of European importance ([http://ec.europa.eu/transport/themes/infrastructure/ten-t-policy/index\\_en.htm](http://ec.europa.eu/transport/themes/infrastructure/ten-t-policy/index_en.htm), [http://ec.europa.eu/transport/themes/infrastructure/ten-t-guidelines/maps\\_en.htm](http://ec.europa.eu/transport/themes/infrastructure/ten-t-guidelines/maps_en.htm)).

At the same time, it is the role of Member States to set taxes, road charges and maintain the road network in good condition to ensure that road users benefit from the best possible service in terms of travel time and safety at a fair price.

Existing EU legislation (the "Eurovignette" Directive) sets the framework for road infrastructure charges to be applied by Member States on the TEN-T and motorways, as well as for vehicle taxes for lorries (heavy goods vehicles with a total permissible laden weight above 3.5 tonnes). No such EU legislation exists for buses (Vehicles designed to carry at least 8 passengers in addition to the driver), light goods vehicles or cars.

\*14. In your opinion, what should be the **scope** (as far as **vehicles** types are concerned) of EU legislation in the area of **charges linked to the use of roads**?

- All types of road vehicles (both freight and passenger transport, heavy- and light-duty vehicles)
- Freight transport only (both heavy and light goods vehicles)
- All heavy duty vehicles, i.e. lorries and buses
- Heavy freight transport only (goods vehicles of more than 3.5 tonnes)
- The EU should not set any rules in this respect
- No opinion / I don't know

\*15. In your opinion, what should be the **geographic scope** of EU legislation in the area of **charges linked to the use of roads**?

- All main or national roads
- Road infrastructure of European importance (TEN-T roads, motorways and national roads carrying significant international traffic)
- The TEN-T road network
- The EU should not set any rules in this respect
- No opinion / I don't know

While some cities have introduced various policies to reduce urban **congestion** and pollution (access restrictions, low emission zones or congestion charging), different solutions have been implemented on a few congested sections of the tolled inter-urban road network (e.g. lower charges outside rush hours or increased ones on Friday afternoons for lorries). Some of these schemes have proved to be successful in reducing congestion and shifting traffic to less congested periods, thus ensuring a more efficient use of the infrastructure.

The “Eurovignette” Directive allows the differentiation of road charges according to time of the day, type of day (weekday or weekend day), or season for lorries. At the same time, it requires that such differentiation be revenue neutral, i.e. if increased tolls are applied in rush hours, they have to be decreased below average outside rush hours. This makes the option less interesting for Member States and concessionaires.

In addition, no such rule exists for cars, that is, Member States are free to set congestion charges for cars. This can lead to unequal treatment of passenger and freight transport, which can not only be perceived as discriminatory but would not be the most efficient way to reduce congestion either.

- \*16. In your opinion, should the EU act to address the issue of **congestion**?
- No, it is a problem to be dealt with by Member States / local authorities
  - Yes, but only on the TEN-T network
  - Yes, on TEN-T network, motorways and parallel interurban roads

### B.3 Overall approach to addressing the problems

A number of possible approaches could be taken to address the challenges identified above. Please rate the different policy principles according to your preference.

- \*17.1 Do you think that, taking account also of the taxes paid by motorists, transport charges should be applied in line with **the 'polluter pays' principle**?
- Fully agree
  - Rather agree
  - Rather disagree
  - Fully disagree
  - Don't know / No view
- \*17.2 Do you think that, taking account also of the taxes paid by motorists, transport charges should be applied in line with **the 'user pays' principle**?
- Fully agree
  - Rather agree
  - Rather disagree
  - Fully disagree
  - Don't know / No view

- \*18. Do you think that the overall price of transport (including taxes and infrastructure charges) should cover all transport externalities (i.e. the full cost of infrastructure use and negative environmental and health impacts of transport)?
- Fully agree
  - Rather agree
  - Rather disagree
  - Fully disagree
  - Don't know / No view
- \*19. Do you think the revenues from transport taxes and charges should be used for covering transport related expenditures (e.g. infrastructure development)?
- Fully agree
  - Rather agree
  - Rather disagree
  - Fully disagree
  - Don't know / No view
- \*20. Do you think that the EU should make sure that all vignette prices are set proportionately to the use made of the given road network by a given type of vehicle?
- Fully agree
  - Rather agree
  - Rather disagree
  - Fully disagree
  - Don't know / No view
- \*21. Do you think that dynamic road pricing (depending on time of day or level of congestion) should be applied on congested interurban roads if it allowed more reliable/shorter travel times in peak hours?
- Fully agree
  - Rather agree
  - Rather disagree
  - Fully disagree
  - Don't know / No view

## 22. Would you like to make any other comment or suggestion?

1500 character(s) maximum

Transport & Environment recently commissioned CE Delft to monetise the external costs of HGVs and to then consider how much of the amount was internalised through the existing taxes and charges that such users pay. It was found that 70% of the costs that HGVs cause are not being covered by the users of such vehicles. This 70% amounts to 100 billion euro per year. The study highlighted how more needs to be done in Europe for such costs to be internalised so that society does not have to pay the cost. Tolls are one mechanism to encourage the uptake of cleaner vehicles and logistic efficiency, which brings reductions of external costs.

## Section C: Specialised questionnaire

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If you wish to respond to this part of the questionnaire, please indicate in what capacity you are answering the questions?

- As road user with knowledge on the topic
- As an expert in the field
- As a person/organisation with interest in the legislation,
- Other (please specify)

### C.1 Identification of the problems

#### C.1.1 Infrastructure quality

1.a With regard to the quality of road infrastructure, in your opinion, has the situation changed since 2011 in the **country you selected** under B.1.1 ?

- Yes, the quality of roads has deteriorated since 2011
- No, the quality of roads has not changed significantly since 2011
- Yes, the quality of roads has improved since 2011
- I don't know / no opinion

1.b With regard to the quality of road infrastructure, in your opinion, has the situation changed since 2011 in the **EU in general**?

- Yes, the quality of roads has deteriorated since 2011
- No, the quality of roads has not changed significantly since 2011
- Yes, the quality of roads has improved since 2011
- I don't know / no opinion

2.a In your opinion is the investment in road maintenance sufficient in the **country you selected** under B.1.1 ?

- Yes, it is sufficient
- No, it is slightly insufficient
- No, it is largely insufficient
- No opinion / don't know

2.b In your opinion is the investment in road maintenance sufficient in the **EU in general**?

- Yes, it is sufficient
- No, it is slightly insufficient
- No, it is largely insufficient
- No opinion / don't know

### C.1.2 General questions on taxes and charges in the area of road transport

3. Do you think that the differences in the type of charges and vehicle taxes between Member States can distort **competition between hauliers** in the internal market?

- Fully agree
- Rather agree
- Rather disagree
- Fully disagree
- Don't know / No view

4. Do you think that the fact that lorries weighing between 3.5 and 12 tonnes are not subject to road charges in some countries can distort competition in **freight transport**?

- Fully agree
- Rather agree
- Rather disagree
- Fully disagree
- Don't know / No view

5. Do you think that the fact that the Eurovignette Directive does not cover light goods vehicles (vans below 3.5 tonnes), which are hence treated as passenger cars and are not subject to road charging in some countries (or are subject to vignettes as opposed to distance-based tolls) can distort competition in **freight transport**?

- Fully agree
- Rather agree
- Rather disagree
- Fully disagree
- Don't know / No view

### C.1.3 Vignettes

6. Do you consider that the current rules on vignettes applied to lorries are appropriate?
- Yes, they ensure a good reflection of the real costs (of road damage, air pollution, noise, congestion, accidents)
  - They ensure an acceptable reflection of the real costs and can only slightly distort competition between hauliers
  - No they result in an imperfect approximation of real costs and can significantly distort competition between hauliers
7. Do you think that fairness vis-à-vis non-resident road users of passenger cars could be ensured / improved through explicit rules?
- Not at all
  - To some extent
  - Significantly
  - Very significantly
  - Don't know / No view

#### C.1.4 Fuel consumption/CO2-emission of heavy goods vehicles

With transport at large being responsible for 1/5 of greenhouse gas (GHG) and 23% of CO<sub>2</sub>-emissions in the EU, road transport accounts for 72% of these. GHG emissions from lorries have increased by about 20% between 1990 and 2013, and they are set to increase further.

While gradually tightened CO<sub>2</sub>-standards make sure that cars and vans become ever more efficient, CO<sub>2</sub>-emission from lorries and buses will only be monitored by the end of the present decade with mandatory limits being considered as a possible future measure. At the same time, although lorries and buses have become cleaner thanks to the regulation of harmful emissions (starting with Euro I in 1992 to VI from 2014), a lorry complying with the Euro VI standard may not have improved fuel consumption and CO<sub>2</sub> emissions compared with a Euro I lorry (around 30 litres per 100km).

In case you have supporting or conflicting evidence, please submit it to the Commission (functional mailbox [MOVE-D3-Eurovignette@ec.europa.eu](mailto:MOVE-D3-Eurovignette@ec.europa.eu))

Questions on whether the EU should take action to address the issue and if so how are asked in the following sections.



## 8. Would you like to make any comment on the issue?

*1000 character(s) maximum*

GHG emissions from road transport are a problem that need to be addressed by regulators both at an EU and national level. The EU should help MS to reduce GHG from their road transport sector by providing tools that encourage such reductions. Transport & Environment are campaigning for EU CO2 standards for HDVs similar to the type of standards that exist for LDVs today. Tolls could also be a very effective way of reducing GHG emissions from HDVs. Tolls can send price signals that motivate the purchasing of cleaner vehicles and cleaner vehicle technology. This can be seen if you look at the uptake of less polluting vehicles in countries who chose to differentiate their tolls based on the EURO class of trucks. This smart mechanism reduced the air pollution from road transport. The same should be promoted by the EU for GHG emissions and MS should be given the legal possibility of differentiating their tolls based on GHG emissions.

### C.1.5 Possible additional issues

## 9. Do you see other problems related to road infrastructure charging that may need to be addressed at EU level?

*1500 character(s) maximum*

The charging of HGVs starting from 3.5 tonnes motivates certain companies to use vans or 'LGVs' as a means to avoid having to pay any tolls (as well as to avoid other legislation that applies to trucks). This increases the congestion on tolled roads and undermine the purpose of the Eurovignette Directive. Van use is likely to increase in Europe as E-Commerce grows 12.5% annually with vans remaining the preferred means of delivery for such purchases. The inclusion of vans in the Eurovignette would be a step towards creating fair competition in the freight market. Furthermore, it would motivate the efficient use of vans when used for goods transport.

Also, AEA Ricardo's study for DG Move on Directive 1999/62/EC found that distance-based electronic tolls are the most effective method of tolling with regard to reducing externalities, encouraging more efficient use of vehicles, and securing revenue for national governments. The upcoming review of Directive 1999/62/EC should promote this charging method in Europe by phasing out time-based vignettes which have been shown to be far less effective.

### C.2 Subsidiarity, the role of the EU

10. In your opinion, at what level of governance should the issue of increasing **CO2-emissions** from lorries be dealt with?

- Since it is a global problem, the EU should set the right incentives to curb emissions (either through pricing or regulation or a combination of both)
- The EU should set the framework for Member States to act at national/local level
- The issue should only be dealt with by Member States and/or local authorities
- There is no need to deal with the issue / not a problem
- No opinion / I don't know

### C.3 Options to address the problems

In order to address the challenges identified above, the Commission is considering a number of possible approaches. At the same time, one may not attach the same level of importance to addressing the different issues.

11. How important it is, in your opinion, to address the identified issues through the revision of the Eurovignette Directive?

	Not important at all	Of limited importance	Rather important	Very important	No opinion
The quality of road infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The issue of road pricing at large	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Specific issues related to vignette systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The issue of congestion	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fuel consumption /CO2-emissions of heavy goods vehicles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

### C.3.1 Infrastructure quality

12. As regards the **challenge of road maintenance**, how do you rate the following options? Note that rules on the levying of taxes and charges do not in themselves affect the way how revenues collected are used.

	Completely inadequate	Rather inadequate	Rather adequate	Completely adequate	No opinion
<p>Introduction of <b>rules on the liability of the keeper of a toll road</b> (motorway or any other part of road infrastructure where a toll or user charge is collected) to maintain the given road section in sufficiently good/safe condition in order to avoid accidents or material damage due to its state</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**Monitoring and reporting of toll revenues** as well as **expenditures on maintenance /operation** of toll roads with a view to **raise the awareness of Member States** about the difference between the two, i.e. either

- Costs are higher than revenues – indicating that charges could be increased for the purpose of fairness



<ul style="list-style-type: none"> <li>• Toll revenues exceed maintenance and external cost – revenues should be decreased or reinvested in the infrastructure in order to avoid overcharging</li> </ul>					
<p>Requiring Member States to prepare <b>national plans on the maintenance and upgrade</b> of their road networks (TEN-T, motorways and expressways, taking into account relevant provisions of Regulation (EU) No 1315/2013 on Union guidelines for the development of the trans-European transport network)</p>	○	○	○	○	●

13. In your opinion, what could be the impacts of the above measures on the quality of transport infrastructure? Would you like to suggest any other measure?

1500 character(s) maximum

The monitoring and reporting of toll revenues to assess whether the tolls are set at the appropriate level should be done in a transparent manner that considers the external costs of tolled vehicles - this could be reported to the EU.

### C.3.2 Charges linked to the use of roads (including vignettes)

14. As regards the issues with **road pricing**, how do you rate the following options for **Freight transport (heavy goods vehicles, HGVs)**

	Completely inadequate	Rather inadequate	Rather adequate	Completely adequate	No opinion
Removing the possibility of exemptions for HGVs lighter than 12 tonnes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Including <b>lighter lorries above 2.8 tonnes</b> in the scope of the Eurovignette Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>



Including <b>all light goods vehicles</b> in the scope of the Eurovignette Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Phasing out vignettes for HGVs (only distance-based charging would be allowed, but optional)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Making distance-based charging mandatory <b>for HGVs</b> on the TEN-T	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Making distance-based charging mandatory <b>for all goods vehicles</b> on the TEN-T	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

<p>Replacing the current differentiation of charges according to EURO classes by mandatory external cost charging for air pollution and noise (only possible in the case of distance-based charging)</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Review of caps (maxima set in Annex IIIb of the Directive) on external cost charging</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Inclusion of the external accident costs not already covered by insurance schemes into road charges/tolls (only possible in the case of distance-based charging)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

15. As regards the issues with **road pricing**, how do you rate the following options for **Passenger transport (and light goods vehicles)**

	Completely inadequate	Rather inadequate	Rather adequate	Completely adequate	No opinion
<p><i>Introducing rules concerning vignette systems for passenger cars, light duty vehicles (vans) and buses: Setting a maximum ratio between the "average daily price" of short-term (weekly) vignettes and long-term (yearly) vignettes</i></p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p><i>Introducing rules concerning vignette systems for passenger cars, light duty vehicles (vans) and buses: Setting a maximum ratio also in respect of daily vignettes (similarly to what the Eurovignette Directive provides for in respect of lorries)</i></p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p><i>Including other vehicles in the scope of Chapter III of the Directive (i.e. also covering distance-based tolls, external cost charging, revenue neutrality): Buses should be covered since they cause similar damage to the infrastructure as lorries</i></p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p><i>Including other vehicles in the scope of Chapter III of the Directive (i.e. also covering distance-based tolls, external cost charging, revenue neutrality):</i> Light goods vehicles should be included to allow fair competition in road freight transport</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p><i>Including other vehicles in the scope of Chapter III of the Directive (i.e. also covering distance-based tolls, external cost charging, revenue neutrality):</i> All vehicles, including cars, should be covered to allow a fair contribution to infrastructure and external costs by all road users (Nb. in some cases cars pay relatively more than lorries for the use of the same road, while they are not required to pay on other roads where lorries are tolled)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Phasing out vignettes for cars /vans and buses (only distance-based charging would be allowed, but optional)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

16. In your opinion, what could be the **impacts** (economic, environmental, social, distributional etc.) of the above measures related to freight and passenger transport? Would you like to suggest any other measure?

*2000 character(s) maximum*

Expanding the scope of the Eurovignette Directive to include vans is necessary if we are to appropriately use tolls to reduce the external costs of road transport. Vignettes should be phased out as they have been proven to be less effective than distance-based systems for reducing the external costs of road transport, improving logistical efficiency, and securing sufficient revenues from tolls.

Coaches need to be included in tolling systems. Coaches are set to further increase on roads since the market is growing exponentially since liberalisation. The inclusion of coaches in tolls could ensure the uptake of EURO VI coaches and cleaner vehicle technologies.

The removal of differentiation based on EURO class is not needed as countries can currently both differentiate and charge additionally based on Air Pollution - these are two tools that can both be effective means to reduce emissions.

17. The current Eurovignette Directive allows the application of **mark-ups** in mountainous regions on roads suffering from acute congestion or the use of which leads to significant environmental damage, provided that revenues are invested in priority projects on the same corridor, contributing directly to the alleviation of the problem (a mark-up of up to 15-25% can be applied depending on whether the project is cross-border or not). This possibility has been used for the financing of the Brenner Base Tunnel between Austria and Italy. Do you think this provision is useful? Should it be maintained, extended or abolished?

- The provision should be maintained as it can enable financing similar projects in mountainous areas
- The provision should be extended to other roads with acute congestion or significant environmental damage caused by their traffic (i.e. without the limitation to mountainous areas). The revenues would still have to be invested in priority projects on the same corridor
- The provision should be extended to other roads with acute congestion or significant environmental damage caused by their traffic, and the use of revenues should be made more flexible (i.e. either invested in priority projects of the same corridor or used to compensate for the higher costs linked to the use of an alternative (existing) infrastructure on the same corridor)
- The provision can be removed as it is not necessary anymore and complicates pricing
- No opinion/ Do not know

18. How would you assess the impact of such measures? Would you like to make any other suggestions regarding mark-ups?

*1500 character(s) maximum*

Member States should be given more liberty to choose where mark-ups can be applied within their country.

19. How do you rate the following options of addressing the congestion challenge?

In order to attenuate the problem of road congestion, the Eurovignette Directive allows the differentiation of charges for lorries according to time of day/week/year. This, however, is only permitted as long as additional revenues from higher charges in peak hours are compensated by lower ones applied outside peaks (revenue neutrality requirement). While a few Member States have applied differentiated charges on specific road sections successfully for cars, the possibility offered by the Directive regarding lorries has not been attractive enough for most.

	Completely inadequate	Rather inadequate	Rather adequate	Completely adequate	No opinion
Making it possible to apply genuine congestion charging (i.e. on top of infrastructure charges) on congested parts of the network in peak hours for <b>HGVs</b>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Making it possible to apply genuine congestion charging (i.e. on top of infrastructure charges) on congested parts of the network in peak hours for <b>all vehicles</b>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extending the possibility to apply mark-ups to roads with acute congestion or significant environmental damage caused by their traffic beyond mountainous areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

20. How would you assess the impact of such measures? Would you like to make any other suggestions?

1500 character(s) maximum

### C.3.3 Fuel consumption/CO2-emissions of heavy goods vehicles

21. How do you rate the following measures in addressing CO2-emissions of heavy goods vehicles (over 3.5t)?

	Completely inadequate	Rather inadequate	Rather adequate	Completely adequate	No opinion
Phasing out and replacing the current differentiation of charges according to EURO classes by differentiation of infrastructure charges according to CO2 emissions of vehicles (as soon as comparable measuring becomes possible)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of vehicles running on low carbon fuels through reduced road charges	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



<p>Promotion of the use of equipment helping to reduce fuel consumption (e.g. aerodynamic devices, low rolling-resistance tyres etc.) through reduced road charges</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Differentiate vehicle taxes according to CO2 emissions of vehicles (as soon as comparable measuring becomes possible)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Adjust fuel taxation according to CO2-content of fuels (outside of the scope of the Eurovignette Directive, but in the scope of Directive 2003/96 /EC on energy taxation and thus subject to unanimity vote in Council)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

22. How would you assess the impact of such measures? Would you like to make any other suggestions?

*1500 character(s) maximum*

The inclusion of CO2 differentiation does not require the removal of EURO class differentiation as both have their place in reducing different externalities from transport. All GHG emissions should be considered by the Commission so that a decarbonisation does not lead to an increase in methane emissions, which also contribute to climate change. If “low carbon” fuels are to be promoted through tolls then proper attention must be paid to the upstream emissions from extraction and transportation of such fuels. For example, a recent study performed by AEA Ricardo for T&E showed how LNG use in trucks bring no GHG or Air Pollution benefits if you consider the entire Well-to-Wheel performance.

The promotion of proven CO2-reducing technologies through tolls (e.g. aerodynamic devices, low rolling-resistance tyres etc) would have the most significant impact on CO2 emissions with tolling eventually based on VECTO results and/or CO2 standard trucks in the future.

## Section D: Attachments

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1. Please provide references to studies or documents that you think are relevant for this consultation. Please provide links for online download where possible.

*1500 character(s) maximum*

<https://www.transportenvironment.org/publications/are-trucks-taking-their-toll-ii>  
<https://www.transportenvironment.org/publications/co2-differentiated-truck-tolls-%E2%80%93-what-eu-should-do>  
<https://www.transportenvironment.org/publications/natural-gas-vehicles-%E2%80%93-road-nowhere>

2. Please provide information on any successful initiatives at regional, national or international level related to road charging that could support the Commission in the impact assessment.

*1500 character(s) maximum*

3. Please upload any documents (supporting documents, positions papers) which you would like to attach to your reply.

## **Useful links**

[About this consultation \(http://ec.europa.eu/transport/modes/road/consultations/2016-eurovignette\\_en.htm\)](http://ec.europa.eu/transport/modes/road/consultations/2016-eurovignette_en.htm)

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## **Contact**

MOVE-D3-Eurovignette@ec.europa.eu

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