

## **iMONITRAF! – Feedback on the Commission proposal for the revision of the Eurovignette Directive (31th May 2017)**

### **Feedback via EU Better Regulation portal**

4000 characters

The Alpine regions are particularly sensitive to negative impacts of freight and passenger transport. The regions along the four major transit corridors Brenner, Gotthard, Mont Blanc and Fréjus have joined forces in the frame of the iMONITRAF and have developed a common transport strategy in 2012. This common strategy proposes the implementation of a Toll Plus system to support a harmonisation of road pricing systems between and along the corridors and to foster the modal shift from road to rail.

In an in-depth analysis, iMONITRAF! partners have analysed several scenarios for a Toll Plus System. The bottom-line scenario indicates that the current legal framework leaves only little room for flexibility. A proposal for an optimized scenario includes the following elements:

1. The 'Plus' of the toll level shall be defined on the basis of additional costs in mountain areas (infrastructure cost, external cost). The impact assessment indicates that additional toll rates of about 20-25 €/km would be appropriate to internalize external costs (including appropriate mountain factors).
2. Toll Plus should serve as a mechanism to harmonise toll levels across the iMONITRAF! corridors to allow a fair distribution of traffic volumes.
3. Toll differentiation must consider future developments beyond today's EURO-norms such as differentiation according to specific CO<sub>2</sub> emissions.
4. To avoid negative economic impacts in the Alpine regions, special provisions for regional transport will be necessary.
5. Revenues should be invested in rail infrastructures or should be used for specific environmental and intermodal projects. An appropriate share of revenues of about 30% to 50% shall be allocated to the regions along the transit corridors.

Considering these core elements of the iMONITRAF! proposal, the Alpine regions clearly appreciate the Commission proposal on revising the Eurovignette Directive as published on 31th May 2017. Especially, the following elements of the revision will be supported by the Alpine regions in the further process:

- Distance-based approach as proposed in Art. 7, paragraphs 6 (HGV) and 7 (LDV) as this strengthens the polluter-pays principle as one major objective of the common transport strategy of the Alpine regions.
- More flexibility in defining the external cost charge as proposed in Art. 7c in combination with new mandatory element of paragraph 5.
- The new possibility of congestion charging (Art. 7da) which in the Alpine regions is mostly relevant in the larger metropolitan areas.
- The dynamic adjustment of the mark-up clause (Art. 7f), allowing for a combination of the mark-up and external cost charge beyond EURO III.
- The new differentiation of tolls according to CO<sub>2</sub> emissions (Art. 7g, paragraph 4)

Considering their effects in Alpine regions, the Alpine regions however question the following elements of the proposal:

- Exemption of most stringent EURO emission standard in external cost charging does not seem appropriate (Art. 7c, paragraph 3). Lower emissions of these vehicles are anyhow reflected in external cost factors, they should also contribute to internalisation (especially considering their high share in long-distance transport).
- Similar arguments hold for the “deduction” rule of the mark-up and external cost charge (Art. 7f, paragraph 4). The combination of the mark-up and external cost charge should be possible for all Euro emission classes – thus clearly separating the infrastructure and the external cost logic. An exemption for EURO VI until 2023 would hamper the implementation of the polluter-pays principle in mountain areas, considering that a large share of the long-distance vehicle fleet already uses EURO VI vehicles
- Flexibility to consider specific needs of regional (short-distance) transport. In order to avoid negative economic impacts in the peripheral Alpine regions and to support their economic development, there should be enough flexibility in the provisions to allow for specific regulations for regional transport (which has very limited potential to shift from road to rail). In this respect, especially the consideration of origin and destination transport in the non-discrimination article (Art. 7, paragraph 4) seem critical.

For further information on the potential implementation of Toll Plus in the Eurovignette please refer to the attached factsheet.