

Eurovignette Directive

Call for action: Ambitious modal shift policies and the health of people and environment in the Alpine regions require a swift agreement

The Alpine regions are particularly sensitive to the negative impacts of freight and passenger transport. This is due to very high shares of heavy goods vehicles (HGV), specific topographical features, limited spatial resources and highly vulnerable ecosystems. The **iMONITRAF! Network**, which associates the Alpine regions along the major transit corridors, and **CIPRA International**, as umbrella organisation of environmental NGOs in the Alps, **are both dedicated to implementing a coordinated and ambitious modal shift policy in the Alps, in order to reduce the burden on people and nature, lower the volume of road traffic¹ and achieve the goal of climate neutrality.** As both partners consider a targeted approach to distance-based road pricing as a key element to a sustainable transport policy and for cross-financing the development of new rail infrastructures, iMONITRAF! has put forward specific claims for a “Toll Plus approach”.²

Implementing the Toll Plus approach and thus a more ambitious road pricing system on the Alpine corridors, however, requires a swift agreement on the Eurovignette Directive to accelerate the transition towards a sustainable transport policy **contributing to the objectives of the EU Green Deal.**

- The Alpine regions require more flexibility in designing road pricing systems in line with the polluter-pays principle, especially to integrate higher infrastructure and external costs along the Alpine corridors.
→ An ambitious approach on road tolls for freight vehicles will incentivize modal shift and ensure that new rail capacities for freight transport, as currently developed in the frame of the TEN-T policy, are fully used.
- Ambitious tolls need to be implemented as soon as possible to provide transparent incentives on the transport and logistics market and to enable operators and infrastructure providers to adjust their portfolios in the right direction.
→ With the Recovery plan for Europe focused on the EU Green Deal, additional funding will be available – the policy framework with an ambitious “push approach” needs to be aligned accordingly to make the transition happen.

¹ For CIPRA the reduction of the overall volume of traffic, according to the Alpine Convention Transport Protocol Preamble, is of crucial importance: “...*Desiring to make a decisive contribution to sustainable development and to improvement of the quality of life by reducing the volume of traffic, managing transport in a more environmentally-friendly manner and increasing the effectiveness and efficiency of existing transport systems;*

² iMONITRAF! Toll Plus Resolution 2016:

<http://www.imonitraf.org/DesktopModules/ViewDocument.aspx?DocumentID=gU+ouhyzA78=>

- The remaining vehicle fleet on the Alpine corridors should be built on best-available technologies, making use of low-emission or even zero-emission vehicles.
 → **A more ambitious approach on variations of tolls is required, taking into account specific circumstances of the Alpine regions** and in line with the polluter-pays principle³.

In general, both iMONITRAF! and CIPRA welcome the recent compromise proposal on the Eurovignette Directive⁴, and agree that the major elements of this proposal go in the right direction. **They call on policy makers at EU level, and in particular the German Presidency, to come to a swift agreement on this dossier**, giving the Member States the necessary tools for further aligning their policy framework.

Specific recommendations

Furthermore, iMONITRAF! and CIPRA call on EU policy makers to take into account the specific needs of the sensitive Alpine environment and of the trans-Alpine transport networks when finalising the new provisions of the Directive:

The modal shift objective should remain at the core of the Eurovignette approach

1. With the **mark-up for mountain regions (Art. 7f)**, the Alpine regions should obtain flexibility to take into account higher infrastructure and external costs in mountain regions. Only a high mark-up, implemented in a common approach on the whole transnational corridor, will be sufficient to generate additional incentives for modal shift and leading to a better cost-competitiveness of multimodal transport solutions. A high-mark-up will enable the alignment of tolls across the Alpine corridors, avoiding detour traffic which causes unnecessary CO₂-emissions.⁵
 → **We welcome the current version of the revision document which foresees a mark-up factor of up to 50% for cross-border implementation (Art. 7f, 1(b)).**
2. Inclusion of **external costs is as well a key requirement of the Alpine Convention⁶ to implementing the polluter-pays principle**. However, external costs in mountain regions are much higher than in flat areas. Recent studies have come to conclude that a factor 4 has to be taken into account.⁷

³ According to the Alpine Convention Transport Protocol Article 1 (2) "*The Contracting Parties undertake to develop the transport sector in accordance with the precautionary principle, the principle of avoidance and the polluter-pays principle.*"

⁴ Council of the European Commission: Proposal for a Directive of the European Parliament and of the Council amending Directive 1999/62/EC on the charging of heavy goods vehicles for the use of certain infrastructure – Mandate for negotiations with the European Parliament; Document for the Permanent Representatives Committee, 11th June 2020, Interinstitutional File 2017/0114(COD).

⁵ For comparison of existing toll rates on the major Alpine corridors, please refer to the iMONITRAF! Annual Report 2019 (p. 36):

<http://www.imonitraf.org/DesktopModules/ViewDocument.aspx?DocumentID=iPmMdEMqK9A=>

An assessment of different scenarios for Toll Plus is provided in the iMONITRAF! Toll Plus Update 2019, also available on the iMONITRAF! homepage.

⁶ According to the Alpine Convention, Transport Protocol Art.3/Paragraph 1c/Lit.aa "the contracting parties commit themselves to take account of the interests of the economy in such a way that (aa) increase the economic viability of transport and internalise external costs".

⁷ EUSALP study „External costs in mountain regions“ (2017). Online: <https://www.alpine-region.eu/results/study-external-costs-mountain-areas>

→ We support the approach on external cost pricing of the recent document. However, we call for a higher “mountain factor”. Factor 2 is not sufficient in terms of internalisation – also considering further externalities which are not considered.⁸ The **relevant reference in Annex IIIB** (below the tables with reference values) **needs to be adjusted to “factor 4”**.

→ The integration of a **CO₂-charge supports this approach, we thus welcome its integration in Art. 7c**.

→ We highly **welcome the deletion of the “deduction clause” (previously Art. 7f,4)**. We have always argued that both elements – mark-up and external costs – should be available for implementation on mountain corridors.

An ambitious variation of tolls can support a clean and decarbonised vehicle fleet in the sensitive Alpine environment

3. Already today, the vehicle fleet as operated in long-distance transport across the Alps is dominated by EURO VI vehicles. To set incentives beyond this vehicle technology, and especially to set incentives for vehicles with low CO₂ emissions, the provisions of the Eurovignette Directive should be ambitious and in line with the European framework on CO₂ standards and the overall aim to decarbonise the transport sector.

→ We **support the ambitious approach of the current proposal to introduce a new variation mechanism according to CO₂-standards (Art. 7g-a)**. The current proposals, should be maintained. Provisions should be finetuned to minimise the administrative burden so that the mechanism can be implemented as soon as possible.

→ However, **we cannot support the full exemption of “zero-emission” HGV from toll payments** as proposed in the recent document. To comply with the polluter-pays-principle, “zero-emission” vehicles should not only make a contribution to infrastructure costs, but their external costs also need to be considered: noise costs and congestions costs are the same for “zero-emission” vehicles and CO₂-emissions of their whole lifecycle also need to be accounted for. We propose to limit the exemption to 75% compared to CO₂-emission class 1 or, in any case, to guarantee that the full exemption is stopped at the end of 2025 (as foreseen in the document).⁹ Even a 75% exemption, as foreseen in the recent proposal for zero-emission vehicles 2026 onwards, should be sufficient to trigger technological change and to set clear incentives for innovation.

⁸ E.g. costs related to the impairment of nature and landscape which are more pronounced in mountain areas.

⁹ The EU Handbook on external costs of Transport (version 2019) does not differentiate the cost categories for the vehicle technologies hydrogen and electric, it only shows costs differentiated for Diesel HGV and CNG- vehicles. For air pollution costs, external costs are indeed close to zero for these technologies, except the remaining non-exhaust emissions. However, noise costs and congestion costs are the same for all vehicle technologies, the handbook does not differentiate any vehicle technologies or emission classes for these cost categories.