



CIPRA
LIVING IN
THE ALPS

Schaan, 10th of January 2022

To
The Members of the European Parliament
Committee of Transport and Tourism (TRAN)

Call for action

Improvement of the current version of the Eurovignette Directive following to the necessities of climate and civil protection and an overarching transport policy

Dear Sir, MEP Ferrandino

With regards to the trilogue negotiations on the Eurovignette Directive the European Council's position was announced at the European Parliament's plenary in November and referred to TRAN. However, this should not be the end of the discussion, as the current status violates various European concerns and agreements.

CIPRA is an independent non-governmental, non-profit umbrella organisation that has been committed to the protection and sustainable development of the Alps since 1952. With its international executive office in Liechtenstein, its representatives in seven Alpine states and around one hundred member organisations and institutions CIPRA today represents an important Alpine-wide network.

The 8 Alpine states¹ have committed themselves together with the European Union through the joint ratification of the Transport Protocol of the Alpine Convention² to shift freight traffic from road to rail. Even more: according to the Alpine Convention, the polluter pays principle must be enforced and market-based incentives and suitable infrastructures must be created. The contracting parties also undertake to uphold the precautionary and avoidance principles, which are also in the spirit of the European Green Deal. Its stated aim is "to disconnect growth from resource use and not to leave anyone, human or regional, in the lurch"³. As a consequence, the number of kilometres travelled on the roads should basically decrease.

In the current version of the Eurovignette Directive, however, none of this is yet the case, on the contrary.

These are not negligible issues, because the air pollution in the highly affected Alpine areas and many other urban regions is serious, as the recently published 8th Report on the State of the Alps clearly states (see RSA8 - Air Quality in the Alps, published 2021⁴).

So remedial action is urgent. The Eurovignette Directive would be the instrument for this.

¹ Austria, France, Germany, Italy, Liechtenstein, Monaco, Slovenia and Switzerland

² https://www.alpconv.org/fileadmin/user_upload/Convention/EN/Protocol_Transport_EN.pdf

³ https://ec.europa.eu/info/strategy/priorities-2019-2024/european-green-deal_de

⁴ <https://www.alpconv.org/en/home/news-publications/publications-multimedia/detail/rsa-8-air-quality-in-the-alps/>



But there are too many exceptions and softenings in the current version, which do not have an effect on the climate in time. In addition, the long-term goal of shifting cargo transport to rail (the modal shift), is endangered by strongly favouring low- and so called zero-emission lorry engines. But rail cargo transport is much more energy-efficient and climate friendly than any kind of lorry transport.

At least three substantial improvements to the Eurovignette Directive are needed, which, by the way, are entirely in line with the original version of the European Parliament:

1 - The implementation of distance-based levies instead of time-based vignettes must happen faster and in a more targeted manner. Action must be taken instead of delays created. (See the amendments 1, 2, 5 and 6 – 9.)

2 - The modal shift in freight transport from road - i.e. HGVs - to rail must not be disadvantaged compared to what it is at present. Therefore, the external costs have to be integrated into the calculation of the Eurovignette as best as possible. (See the supplementary motions for amendments 10 – 15, 27 as described below.)

3 - The necessary regional differentiation of specially-burdened areas has to be maintained. No new veto option for neighbouring countries may be introduced for these mark-ups. (See amendments 16 – 19.)

Misleading priorities of transport ministers

Unfortunately, the national transport ministries have been pursuing two goals since the end of 2019 in an ongoing race to the bottom. They aligned themselves with the lowest common denominator and have primarily focused on favoring battery and hydrogen-powered trucks. These provisions, however, make it impossible to adequately compensate for noise and particle dust pollution, which is still necessary, and to urgently shift cargo transport to the railways. The huge investments already made, as well as the upcoming investments in new, rail-bound cargo lines (such as the Brenner Tunnel) are in danger of becoming unprofitable bad investments. The economic pressure to choose the most sensible means of transport, obviously the railway, is currently eliminated in the Eurovignette Directive. On the contrary, there is a danger that lorry transit will be further promoted.

Too simple an approach by T&E

This negative finding is not changed by the endorsement of the current Eurovignette Directive by the organization Transport & Environment (T&E), an NGO that unfortunately currently focuses far too much on road advocacy. T&E focuses on the promotion of battery and hydrogen-powered trucks and neglects the modal shift as well as the other environmental concerns, noise and particulate matter prevention as well as energy efficiency.



Well-reflected suggestions for improvement

We therefore call on you to vote in favor of the following amendments as presented by the two members of the European Parliament Barbara Thaler and Anna Deparnay-Grünenberg.

These additions balance the bill to some extent so that the original efforts to promote the modal shift from road to rail do not become completely useless. They correct the one-sided favouring of road transport.

An aggregated explanation of the additional demands can be found in the annex, since from an ecological point of view not all of them are favourable.

These are the suggested ecological improvements in a nutshell:

1 - Eliminate delays and confusion by parallel tolling systems

Amendments 1, 2 and 5 shorten the transitional periods from time-based to distance-based tolling.

The associated transitional provisions are also removed in *amendments 6 - 9*, which simplifies the entire bill and makes its implementation much more stringent.

2 - Best possible inclusion of external costs maintain the support for modal-shift

Amendment 10 avoids an only partially passing on of the infrastructure costs.

Amendment 11 secures the use of external-cost charge for air or noise pollution to address specifically these issues. It includes the support for rail and bus transport routes.

Amendment 12 includes not only air but also noise pollution.

Amendment 13 makes it compulsory to levy a charge to internalise the external costs of CO₂ emissions and air pollution.

Amendment 14: As levying the charge in amendment 13 becomes compulsory it is possible to delete this specific obligation without replacement

Amendment 15 prohibits the combination of a CO₂ levy with an infrastructure charge.

On the one hand, these measures make the levies consistent and correct the otherwise disadvantageous freight transport by rail. On the other hand, through their compulsory collection, they actually will create a positive impact on the climate. This is otherwise not happening.

3 - Do not veto mark-ups

Amendment 16 removes the Council's de facto disallowance of mark-ups. They are to be between 25% (instead of 15%) and 50% of the average infrastructure charge and no longer have to be affirmatively approved by the neighbouring states. This right of veto of a single neighbouring state envisaged by the Council would in fact have made the levying of mark-ups impossible.



Amendment 17 by Anna Deparnay-Grunenberg proposes a variant that leaves the possibility of an increase through mark-ups starting at 15% of the average infrastructure charge, but also deletes the neighbouring countries' right of veto.

Amendments 18 (Thaler) and 19 (Deparnay-Grunenberg) also remove the Council's requirement for the consent of all participating member states.

The maintenance of regionally possible toll increases is essential. They need this possibility to adequately address regionally specific circumstances without the possibility of veto by neighbouring states. In such a way the specific costs continue to be adequately internalized. This is not only a central concern for the Alpine regions. Competitive rail transport and the protection of urban regions with heavy traffic is a pan-European concern.

These additions by B. Thaler and A. Deparnay-Grunenberg are well founded and really necessary in terms of an effective climate policy. Supplemented in this way, the measures will contribute to climate protection in a timely and needs-based manner. A conceptually overarching approach is also achieved.

Thank you very much for your attention.

With best regards

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ANNEX

Aggregated explanations of suggested amendments not mentioned in our letter

Amendment 3 reduces the prices for the time-related charges for passenger cars in order not to disadvantage short-term users of the roads. **From an ecological point of view, this is a controversial issue.**

Amendment 4 deletes the possibility for the Member States to limit the daily user charge for pure transit journeys.

Amendments 20, 22, 25, 26, 31, 32: Change of the terminology with regards to the specifically addressed levies: In amendments 20 and 22 instead of "infrastructure charges and user charges" (related to the number of axles and the weight of the trucks, where all kinds of engines shall be taxed equally) the term "external cost charges" (where there should be a differentiation of levies, adjusted to the different kinds of engines) is used. In *amendments 25, 26, 31, 32* "external costs and user charges" is used instead of "tolls and user charges".

Amendment 21 newly stipulates that the differentiation in the sub-groups of HGV tolling will be replaced by 2025 by another differentiation that corresponds to the CO₂ emission assessment over the entire life cycle as in the case of passenger cars and light transport vehicles.

Amendment 23: In order to be coherent with the proposed amendments 20 and 22 the reference to the variation of the infrastructure charge has been deleted.

Amendment 24 specifies in the sense of a clarification that the differentiation according to CO₂ emissions should be phased out as soon as another Union-wide carbon pricing enters into force. In the Council's version, this differentiation according to CO₂ emissions should only be made voluntary.

Amendment 27 removes a broad exemption that would have allowed Member States to give only zero-emission vehicles a reduction, without differentiating for other vehicles.

Amendment 28 makes it compulsory (instead of voluntary) to take into account the improvement of environmental performance through conversion to alternative fuels.

Amendment 29 does not include infrastructure charges but tolls and user charges in the reduction options.

Amendment 30 regulates the reporting obligation of the Member States in aggregated form annually instead of within three and later five-year intervals.