

European Commissioner for Mobility and Transport
Mrs. Violeta BULC
European Commission
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Schaan, August 27th, 2019

**Object: „Expert meeting on toll measures at the Brenner" Brussels 28.08.2019
Call for immediate contributions to the solution of the Munich-Verona corridor
within the scope of the Alpine Convention**

Dear Commissioner Bulc

The International Commission for the Protection of the Alps [CIPRA](http://cipra.org) with its national and regional representations and its 100 member organisations, has for many years been strongly committed to Alpine protection and sustainability. In particular, we strive to support and promote solution measures to reduce the major problems caused by transalpine freight traffic for the population, environment and climate in the sensitive Alpine region in the centre of Europe.

The Alpine Convention and its Transport Protocol, to which all participating states and also the European Union are parties, are a central, legally binding guideline for us.

Unacceptable and illegal conditions on the Brenner axis

In particular on the Brenner axis (Munich-Verona corridor), on which more lorry transports cross the Alps than on all other routes together, a large problem of congestion has accumulated. More and more truck journeys compensate for any technical progress in fuel consumption or emissions. Countermeasures that would do justice to the increased topographically-induced burdens in the Alpine region through sufficiently high minimum tolls, toll surcharges that would have an effect on the shifting of traffic, or instruments such as TollPlus or the Alpine transit exchange in the sense of actual true cost pricing have not been taken at European level or are currently in dispute under EU law.

As a result of this stagnation, the impact of transit on human health and nature along the Brenner route is therefore constantly unbearably high. This has been contrary to EU air quality standards for many years.

For this burden to be solved here and now, the popular political reference to possible future solution contributions through the Brenner Base Tunnel is unsuitable: Its use and relief effect is



highly questionable on the road without cost truth, and its access routes will only be realised in decades to come.

Appropriate Tyrolean self-help

The displeasure of the civil society about the pollutant- and noise-induced health pollution and the restrictions in everyday life caused by the transit traffic avalanche is so great that the regional politicians in Tyrol had to implement traffic-restricting emergency measures to ensure traffic safety and flow such as a dosage system and departure bans for trucks (in Salzburg also cars) in the low-ranking road network. This leads to new conflicts with neighbouring states, lobbies and EU authorities.

However, CIPRA expressly welcomes these measures and their permanent application as well as their extension to the entire corridor as solutions that are fair to the polluter. We therefore call on you, Commissioner, neither to take nor to support steps under European law against these measures.

Minimum toll level as key to success

However, CIPRA emphasises above all the main cause of truck traffic congestion: the **completely inadequate truck toll rate in this corridor**. According to current research results¹, this allows at least 700,000 (!) trucks per year to drive environmentally and climate-damaging detours of up to several hundred kilometers because they are economically viable. The fact that the toll for heavy goods vehicles in Austria per kilometer is close to the Swiss level cannot outweigh the fact that the toll in Germany and Italy and thus on 320 of the 430 kilometers of the Munich-Verona corridor is around 4/5 or 80% lower.

In addition to these low-cost toll rates, refunds of fuel taxes to lorry operators in individual countries and excessively low fuel prices in Tyrol also contribute to this detour traffic; the latter, however, only to a small extent compared with the grossly inadequate toll level on most of the corridor.

Therefore, the problem of cheap tolls must become a priority and urgent central object of the solution steps of the participants and the EU Commission.

The pitfalls of the "Rolling Road"

A further increase in the promotion of alternatives to Lorry journeys, as promised by Austria with the provision of doubled capacities in accompanied combined transport by rail ("Rolling Motorway / Rollende Landstraße / RoLa"), cannot be a substitute for fairness of tolls and true cost pricing. In accordance with the polluter-pays principle, the road must first become more expensive, not the alternative with a high tax rate cheaper. Without an increase in the costs of truck journeys, there will be too little pressure for transport companies to transfer to rail.

In addition, the population living in the area also rejects the mostly nocturnal Rolling Motorway journeys due to the high level of noise. New purchases of quieter rolling stock would therefore be

¹ Research of Planoptimo 2018/19 on behalf of the Office of the Tyrolean Provincial Government on the basis of the CAFT survey in the "Zurich Process" of the Alpine states and the EU, documented in the report "Transport in Tyrol 2018", published on 15.08.2019;
https://www.tirol.gv.at/fileadmin/themen/verkehr/verkehrsdatenerfassung/downloads/VB_2018_web_final.pdf p. 8-9



absolutely necessary, which firstly has to be financed according to the polluter-pays principle and secondly takes time. A real relief through the Rolling Motorway will only be possible after the completion of the Brenner tunnel and with new, quieter rolling stock.

Your meeting on August 28th

On 28 August 2019, experts from the countries and regions concerned are to meet representatives of the EU Commission at the "Expert meeting on toll measures at the Brenner" in Brussels, which was announced a few months ago.

According to point 5 of the 10-point program "to relieve the population of commercial heavy goods traffic on the Brenner corridor" adopted at the transit summit of the German and Austrian transport ministers with top politicians from Tyrol and Bavaria on 25 July 2019 in Berlin, Austria and Germany want to present "a proposal at the forthcoming Brussels meeting in order to achieve greater flexibility in the toll tariff structure for Lorries". The revision of the infrastructure charging directive must enable a consistent pan-European solution to be found that allows markups with a sustainable steering effect for particularly polluted areas. The aim of the steering effect is to achieve a significant shift of heavy goods traffic from road to rail and to prevent detour transit, using the example of the Brenner, among others".

CIPRA's demands on the EU Commission

In this context, CIPRA recalls Articles 1 and 3 of the Protocol on Transport of the Alpine Convention, under which the Contracting Parties - including, since 2013, the European Union - have committed themselves to reducing the burden to a level that is bearable for man and nature. The contracting parties also committed themselves to ensuring a fair framework between the modes of transport, not endangering the health of the population, applying the polluter pays principle and internalising external costs.

As the example of the Brenner corridor shows particularly dramatically, these **obligations** have not been fulfilled by the European Union, among others, which is a clear violation of existing law (including European law) and which must urgently be changed by the measures listed below. CIPRA expects from you, dear Commissioner, that the EU Commission

1. presents in the short term a proposal for an effective revision of the EU Road Charges Directive in the direction of minimum instead of maximum tolls and establishes the permissibility of toll surcharges with direct modal shift effect in sensitive areas such as the Alps.
2. immediately and emphatically approach the competent representatives of the Member States Italy and Germany to align the HGV toll on their sections of the Munich-Verona corridor (currently approx. 16 c/km for heavy goods vehicles) with the level in Austria (73 c/km).
3. proactively took up the efforts of the regions and States which led to the measures in Tyrol mentioned above and to this 10-point program at the forthcoming meeting.



No new Alpine transit motorways

We would also like to point out that the construction of further high-ranking roads for transalpine traffic, such as an Alemagna/A27 motorway Venice-Munich, which is required as a "solution" in individual member states and unfortunately also in European Union processes (e.g. EUSALP), is prohibited by Article 11 of the Transport Protocol of the Alpine Convention and is therefore inadmissible and, among other things, contrary to EU law. We expect you to take clear and timely steps and countermeasures in this regard as well.

We ask you for immediate and targeted action by the EU Commission, in particular on the truck toll issue on the Brenner corridor, and ask you for timely information on the steps you have taken.

We remain as CIPRA International and on behalf of the CIPRA representatives of Germany, Austria, South Tyrol and Italy working intensively along the Brenner corridor as well as in cooperation with civil society organisations on the Alpine transit routes, with our sincere thanks for your attention and kind regards.

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