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Open letter

To the Environment & Transport Ministers and Commissioners
of the Contracting Parties to the Alpine Convention
in Austria, France, Germany, Italy, Liechtenstein, Monaco, Slovenia,
Switzerland and the European Union

Brig, September 5th 2022

Simplon Alliance

Climate and alpine protection need your united will for implementation

Dear National Ministers and EU-Commissioners

On 14 January 2022, you decided to draw up a declaration within the framework of the Alpine Convention, the Simplon Alliance. It is to be adopted at the end of October 2022 at the XVIIth Alpine Conference in Brig (CH), at the COP of the Alpine Space.

The signatory organisations are observers of the Alpine Convention or leading the discussion on shifting freight transit traffic to the railways. We are committed to the protection and sustainable development of the entire Alpine region. We would like to share our main concerns directly with you and recommend them for integration in your declaration.

Your existing obligations

With regard to the three topics of the Simplon Alliance - Alpine crossing freight transport, Alpine and cross-border passenger transport and Alpine tourism mobility - explicit commitments already exist.

All Alpine countries as well as the European Union have committed themselves for many years to binding measures in the framework agreement as well as in the corresponding protocols of the Alpine Convention:



- The transport protocol ^{1 2 3} explicitly states the reduction of the overall traffic volume, the substantial strengthening of the networks of environmentally friendly transport systems and the shift of freight transport from road to rail (intermodal shift).

- The tourism protocol ⁴ explicitly states the restrictions on motorised transport in tourism centres and the improved accessibility of tourism destinations by public transport and the promotion of its use.

Insufficient proposals from the Simplon Alliance

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Despite this great consensus and your commitments to implementation, neither the overall reduction of traffic nor, in particular, the shift of traffic from road to rail is progressing.

This is despite the fact that the **8th Report on the State of the Alps⁵ on air quality in the Alpine region 2021 identified major deficiencies throughout the Alpine region. The valid**

¹ Preamble of the Transport Protocol

(https://www.alpconv.org/fileadmin/user_upload/Convention/EN/Protocol_Transport_EN.pdf): "...aware that, on the one hand, the current potential of transport modes is partly underused and, on the other hand, insufficient attention is paid to the importance of infrastructures for more environmentally friendly transport systems such as rail, shipping and combined systems, as well as to the transnational compatibility and operability of the various means of transport, and that it is therefore necessary to optimise these transport systems by substantially reinforcing the networks inside and outside the Alps;" and further: "...seeking to make a decisive contribution to sustainable development and to an improvement in the quality of life and, consequently, to reduce the volume of traffic, to organise transport in an environmentally friendly manner and to increase the effectiveness and efficiency of existing transport systems;" and: "... aware that increased measures are needed to ensure safety in the transport of dangerous goods;

² **Transport Protocol² (Article 1 (Objectives), paragraph 1a):** "The Contracting Parties undertake to pursue a sustainable transport policy which reduces the burdens and risks in the field of intra-Alpine and trans-Alpine transport to a level that is tolerable for humans, animals and plants as well as their habitats, inter alia by increasing the modal shift, especially of freight transport, to rail, in particular through the creation of appropriate infrastructures and market-based incentives."

Transport Protocol Art.1, paragraph 2: "The Contracting Parties undertake to develop the transport sector in compliance with the precautionary principle, the avoidance principle and the polluter-pays principle".²

According to Article 7, paragraph 1 of the Transport Protocol, "in the interest of sustainability, the Contracting Parties undertake to implement rational and safe transport operations in a coordinated cross-border transport network that

- a) Coordinates modes, means and types of transport and favours intermodality;
- (b) make the best possible use of existing transport systems and infrastructures in the Alpine region, including through the use of telematics, and charge external costs and infrastructure costs to the polluter, differentiated by burden;
- c) favours, by means of spatial planning and structural measures, a traffic influence in favour of the shift of transport services in passenger and freight transport to the more environmentally friendly means of transport and intermodal transport systems in each case;
- d) taps and uses the reduction potentials in the volume of traffic."

³ Monaco and Switzerland have signed and ratified the Framework Agreement, but have only signed the Transport Protocol. The Tourism Protocol has only been signed by Switzerland. All other Alpine countries as well as the EU have signed and ratified all 3 commitments.

⁴ **Art. 13 Tourism Protocol:** "Traffic and transport of tourists (1) The Contracting Parties shall encourage measures aimed at reducing motorised traffic in tourist centres. (2) They shall also support private or public initiatives aimed at improving the accessibility of tourist sites and centres by public transport and at encouraging the use of such transport by tourists." (See

https://www.alpconv.org/fileadmin/user_upload/Convention/DE/Protocol_Tourism_DE.pdf)

⁵ <https://www.alpconv.org/de/startseite/news-publikationen/publikationen-multimedia/detail/rsa-8-luftqualitaet-in-den-alpen/> (in DE, ENG, FR, IT, SI)



WHO guidelines on fine dust PM 2.5 "for the protection of human health is exceeded at most measuring stations"⁶. Traffic pollution is largely responsible for this⁷.

Our concerns for the improvement of the SImplon Alliance

In order to finally take a step forward for the benefit of population and climate protection, we ask you to include the following concerns in your action plan for the SImplon Alliance.

I - Decarbonisation by 2040

The Action Plan must aim at decarbonising transport in and through the Alps already by 2040 - completely and effectively.

A pure conversion to hydrogen trucks is not an effective contribution to climate protection due to its huge energy losses during production. Depending on the type of production, large amounts of CO₂ or other environmentally harmful by-products are created also, especially particulate matters and noise stemming from all kind of trucks.

Since you intend to make the Alpine regions a pioneer of alternative mobility models⁸, the Action Plan should be more precise and call for a traffic reduction in general, with ecologically clean, ambitious and measurable targets. The Alps are already affected by about twice as much global warming as the global average, which is why a fast decarbonisation is necessary.

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II - Creation of cost truth & reference to existing traffic regulations

We ask you to include the creation of **comprehensive true cost pricing** in transport as a jointly supported concern in the Action Plan. Internalisation must not only include a few factors but all external costs (including noise, particulate matter, soil pollution, health costs).

This is all the more important because very contradictory framings were set with the **Eurovignette Directive** adopted in February 2022. Hydrogen and electrically powered lorries are to receive immensely high toll reductions, which will once again massively disadvantage the transfer of goods and the transport of goods by rail in general. In addition, the respective neighbouring countries will now have a veto right for regional toll increases (markups) on the transit routes.

→ **We expect the contracting parties to commit to mutual support in the SImplon Alliance if one of its member states wants to introduce a regional toll increase, a so-called markup.**

⁶ Chapter 5.2 Status of concentrations, section 5.2.1 Comparison with European environmental targets and WHO guidelines (for link see footnote 5)

⁷ According to the summary: "In the Alps, pollutants are released mainly where traffic and urban infrastructure are concentrated." (Link see footnote 5)

⁸ "making the Alpine region a pioneer in alternative mobility models".



In the coming months, the EU Directive on the promotion of combined transport will be revised, the **Combined Transport Directive**. It regulates exactly one topic of the Simplon Alliance⁹, which is why the reference to it is important.

We very much welcome the fact that you mention this regulation in the Action Plan. It is in the interest of the Alpine states to speak out in favour of maintaining the current regulation for the promotion of combined transport as a minimum. Today, a maximum of 150 km each of inward and outward journeys from the ports may be made by road. In between, a minimum of 100 km must be covered by rail (or a waterway). This is the only way in which subsidies (tolls) are granted. There must be *no watering* down of the regulation here, otherwise the use of combined transport at the Alpine crossings will become obsolete. Ideally, in order to ensure the transfer from lorry to rail in transalpine freight traffic, even a tightening to 3 x 100 km¹⁰ is being considered.

- **We ask them to explicitly commit to maintaining or tightening the restrictive funding regime in the Combined Transport Directive within the framework of the Simplon Alliance.**

III - Strengthening road safety

In order to improve road safety, which has been needed for a long time, we also ask you to include two further measures in the Simplon Alliance Action Plan:

There is unfair competition between few road controls and well-controlled rail. The establishment of checkpoints for heavy goods vehicles on transit routes has proven its worth in Switzerland. They can be carried out efficiently and quickly and serve road safety and thus all road users¹¹. We recommend that you introduce them in all Alpine countries, as this will also avoid detours in the future, which are a steadily increasing burden on people and the environment at the Brenner Pass.

- **As a measure for more road safety and modal shift, the intensification of controls on heavy goods traffic on the transit axes is to be recorded in the Action Plan**

In Switzerland, there has long been a **ban on the transport of dangerous goods on the major trans-Alpine mountain passes** of Gotthard, San Bernardino, Great St. Bernhard. The hazardous goods are transported around the mountain ridges, as far as possible by rail. In future, such a ban must apply to the entire Alpine region. So many improvements in transalpine traffic can be achieved with this one measure:

- Less danger to people and the environment
- Relief of the motorways through fewer HGVs on the particularly dangerous Alpine pass roads
- Less CO₂-emissions
- Strengthening of the modal shift (shift of freight transport from road to rail).

⁹ According to chapter 4.1 Alpine Crossing Freight Transport

¹⁰ Maximum 100 km delivery distance on truck - minimum 100 km distance on ship/rail - maximum 100 kilometres discharge distance on truck

¹¹ <https://www.alpeninitiative.ch/themen/sicherheit/> One way in which Switzerland could contribute to better heavy traffic controls throughout the Alps is by organising free training courses and congresses for inspectors from other countries (or by passing on know-how regarding control infrastructure, etc.).



According to the Transport Protocol Art. 2, the Alpine states and the EU have already committed themselves in principle to such measures ¹².

- **The Simplon Alliance's action plan should include a declaration of intent from the contracting parties to ban the transport of hazardous goods on relevant road routes over Alpine passes.**

IV - Alpine tourism transport

"Alpine tourism", as it is often sweepingly called, does not exist because all countries have a very high and different, partly contradictory self-interest in attracting tourists. This makes it extremely difficult to find a harmonised approach. This makes it all the more important to pursue common concerns in good consultation.

All Alpine countries have strong and well-funded national tourism organisations, but most of them still run blanket, undifferentiated advertising campaigns. We therefore very much support your plans to strengthen the shift of tourism and leisure traffic to public transport.

The measures proposed in the action plan sound as if the main target group is only incoming tourists. Sustainable mobility solutions are also urgently needed for Alpine residents.

- **Initiatives and campaigns must be carried out to explicitly address and change the behaviour of the population living in the Alpine region significantly.**

Besides commuter mobility, shopping mobility (including fuel) causes many emissions and other negative side effects (noise and air pollution, congestion, rising infrastructure costs) in the border regions of the Alps.

- **The abolition of VAT refunds between EU and non-EU countries effectively limits cross-border shopping tourism.**

We welcome the chosen focus on the expansion of cycling and hiking infrastructure. However, such constructions also promote land consumption and soil sealing.

- **It is important to stress the need to develop and support nature-based solutions for this type of infrastructure. Soil degradation has to be avoided.**

¹² Transport Protocol Art. 2 b/bb: In order to develop transport within the framework of sustainability, the Contracting Parties undertake to take account of the concerns of society by means of a coordinated environmental and transport policy to limit transport-related burdens and risks in such a way that human health is not endangered and the risk of environmental disasters and the number and severity of accidents are reduced;



In the common European interest

In the past decades, transit traffic congestion has led to fierce protests in some Alpine valleys. These should not flare up again, which is why we call for tangible, concrete action as part of your laudable efforts to forge the Simplon Alliance. With the above-mentioned measures, you can make your mark in a positive and forward-looking way, in conformity with your obligations under the Alpine Convention.

More progressive and effective regulations relieve the noise and pollution burden on the population and their environment. In combination with pan-European agreements such as the Combined Transport Directive, your projects serve Europe's population as a whole.

With best thanks for your affirmation of alpine-wide cooperation and kind regards

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