From CIPRA-International Im Bretscha 22 FL - 9494 Schaan

To All the Members of the European Parliament's Transport Committee

Schaan, 11.11.2005

Opinion of the International Commission for the Protection of the Alps (CIPRA) on the subject of the EU's planned Eurovignette Directive

(Ref.: 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 infrastructures, second reading before the European Parliament)

CIPRA, the International Commission for the Protection of the Alps (Commission Internationale pour la Protection des Alpes), is a non-governmental umbrella organisation representing over a hundred associations and organisations from seven countries of the Alps. With regard to the second reading of the EU's Eurovignette Directive for heavy goods vehicles, we would like to communicate our opinion as follows:

Implementation of the principle of true costs and the polluter-pays principle

For CIPRA-International, consistent implementation of the polluter-pays principle and the principle of true costs is one of the keys to sustainable transport and environmental policy. The decision to amend the Eurovignette Directive is therefore a welcome opportunity.

The individual provisions of the directive should be focused more consistently on real implementation of those principles. In this context, central importance must be attached to external costs, which urgently need to be integrated in the directive at a meaningful level.

In the context of the Convention on the Protection of the Alps (framework agreement, art. 2, para. 2, lit. j), which has been ratified by the European Union, the states parties undertake to respect the precautionary and polluter-pays principles and to adopt appropriate measures in the field of transport among others. In particular it stipulates that *"the volume of and dangers posed by intra-Alpine and transalpine traffic are to be*

reduced to a level which is not harmful to humans, animals and plants and their habitats, by switching more traffic, in particular freight traffic, to the railways in particular by providing appropriate infrastructure and incentives complying with market principles..."

The Eurovignette Directive is explicitly provided for as an instrument complying with market principles and linked to the desired goal of steering demand and shifting traffic to the railways and thus reducing the environmental impacts. What is required is not simply a financial instrument but a real tool for demand management. This goal can only be achieved through the inclusion of external costs.

CIPRA-International welcomes the efforts made by the European Parliament to ensure that external costs continue to be anchored in the draft directive. We would encourage you to persist with this approach.

Tolling regimes

According to the Common Position adopted by the Ministers of Transport, only the costs of infrastructure may be employed to calculate the average toll charges. In order to take a clear step in the direction of true costs and to achieve the desired effect in terms of demand management, however, we consider it essential to take full account of the costs to public health, the environment and buildings, too. As the elected representatives of the affected populations of the Alps, you are therefore called upon to communicate a clear message to the Council on this point.

Once the political decision has been made, the required harmonisation of the basis of the tolling regimes can be performed in a short space of time. This is explicitly confirmed by leading experts in Europe. There is no need for a time frame of more than two years.

CIPRA-International supports the meaningful proposal to leave it to the discretion of the member countries to add a sixty percent mark-up to the infrastructure costs during the transition period (proposal in the amendment: 50 percent).

Differential treatment for sensitive regions

The proposed differential treatment for sensitive regions is extremely positive. In CIPRA's view this is a significant step forward. We would consider it meaningful, however, to specify other sensitive regions in addition to the individual mountain regions and above all to include the urban centres, too. At the very least, the content of the first reading must be confirmed. The Alps suffer not least from high levels of pollutants transported from the surrounding urban agglomerations.

In sensitive zones especially, revenues from tolls on heavy goods vehicles must reflect the real costs. The maximum permissible mark-up of only 15 percent as agreed by the Council is far from adequate to cover what are often considerably higher costs in terms of public health and the environment. CIPRA deplores the proposal to reduce toll markups for sensitive regions to a level that is in no way commensurate with the actual damage caused and hopes that the European Parliament will at least confirm its position in the first reading.

Use of revenues

We very much welcome the proposal that revenues from mark-ups should also be used for upgrading the existing traffic infrastructure there. Please vote in favour of this proposal, since the provision would make a valuable contribution to solving the massive traffic problems now confronting the Alps.

In summary, CIPRA believes that the amendment to the Eurovignette Directive is a significant opportunity to achieve real improvements as long as the European Parliament adopts a clear stance in upholding and further extending its proposals for more sustainability.

We would be grateful for feedback on our opinion.

Thanking you in advance for your trouble, we remain, yours sincerely,

Dominik Siegrist

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President CIPRA-International

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