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Brussels, 19 November 2003

IRU POSITION

IRU Position on the EU Commission Proposal for an amended Directive on the charging of heavy goods vehicles for the use of certain infrastructures DOC COM(2003)448, approved by the IRU Goods Transport Council on 6 November 2003.

I. INTRODUCTION

On 23 July 2003, the Commission adopted a Proposal for amending DIR 1999/62/EC (the so-called "Eurovignette" Directive).

According to this Proposal:

- Time-related charging of heavy goods vehicles for using trans-European motorways and other main road arteries will be replaced by distance-dependent charging
- In addition to the cost of building and maintaining roads, the un-covered cost of road accidents may be charged
- Vehicles concerned are goods vehicles with a GVW of 3.5 tonnes or more (12 tonnes in the 1999 Directive)
- Further differentiations of rates would be allowed depending on vehicle specification, emissions, location, type of infrastructure, time of day, level of congestion
- A higher charge may apply in particularly sensitive areas, notably mountain regions
- Member States may compensate for infrastructure charges, for example by reducing vehicle tax rate
- Revenue would be earmarked for developing the transport sector and promoting the balanced development of transport networks
- Member States are not obliged to introduce road user charging of heavy goods vehicles but must comply with the Directive if they do. They are free to charge for the use of other road infrastructure and/or to charge other road users also.
- Independent infrastructure supervision authorities must be created in each Member State.

II. IRU POSITION

1. Bearing in mind national initiatives in the field of distance-related road user charging and the disadvantages for the road haulage industry, the IRU welcomes, in principle, a common

framework for charging heavy goods vehicles in EU Member States. This will promote the harmonisation of road-specific taxes and charges and thus enhance the internal road transport market.

2. The IRU sees need to point out, however, that fair competition in the EU goods transport market depends on other modes of transport being equally subject to infrastructure charging.
3. The IRU supports the Commission in arguing that road user charging should not mean an increase in the total fiscal burden on goods transport by road. Considering, however, that the proposed measures allow Member States to introduce road user charges on top of existing taxes, charges and excise duty, the road transport sector is concerned that higher costs will result in most Member States and that fierce competition will force many operators out of business before these higher costs are reflected in freight rates. The IRU therefore urges that compensation be compulsory if Member States introduce infrastructure user charging or at least that provisions be made in the proposed Directive to effectively pass on costs to the whole of the economy.
4. The IRU favours that uncovered road accident costs are not included in the charge. Firstly, because the part in these costs relating to accident causation by heavy goods vehicles has not been scientifically established, and secondly, because the infrastructure user charge is an inappropriate instrument for promoting road safety. Instead, a more incentive-oriented system based on more differentiated insurance premiums and applicable to all road users should be envisaged.
5. The IRU welcomes that revenue from charging goods vehicles for the use of infrastructure is earmarked for improving the goods transport industry and transport infrastructure. Recalling and opposing that some national systems openly aim to take money from road transport to develop rail infrastructure, the IRU urges that revenue is used in particular to make road transport more efficient and safe. This could include indirect measures such as the promotion of intermodal transport and related infrastructure. Cross-financing without benefiting the road transport sector should not happen, however.
6. The IRU considers that goods transport operators should not pay for congestion twice, i.e. by costs incurred through time losses on the one hand and by a congestion charge as part of a road user charging scheme on the other. Therefore, the IRU does not accept congestion charges.

If despite this strong recommendation congestion charging was to be considered further

- the IRU notes that for the purpose of congestion charging of heavy goods vehicles only the definition of congestion and minimum levels of heavy goods vehicle share of total road use would need to be agreed, which is not possible at present;
- the IRU urges that in any case congestion surcharges must be known to operators in advance: commercial engagements in road transport without knowing the amount finally due would be unworkable for operators and users alike;
- the unrestricted use of motorways should be guaranteed to goods transport operators, enabling them to use roads when they are not congested. When lorry bans are applied, the congestion charge is an inevitable extra burden that should not be introduced.

7. The IRU is concerned that increased charges for roads in environmentally “sensitive areas” will constitute a serious impediment on commercial relations between parts of the European Union. Furthermore, there are serious risks that the notion of “sensitive areas” will be interpreted differently by Member States and that local environmental concerns will lead to additional charges in many regions in the 25 – later 27 – Member countries. While accepting the political realities of today, the IRU urges that strict and uniform limits and conditions be applied to this surcharge.
8. The IRU sees the advantages of setting up of independent infrastructure supervision authorities, depending on the remit of such bodies. They should be made responsible for the construction and maintenance of adequate and safe road infrastructure, be in charge of using road user charging revenues for those purposes and be instrumental in organising public-private partnerships. The IRU is concerned, however, that it will be difficult to ensure the independence of such organisations in many Member States.

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