



Geneva, 30 September 2020

OPEN LETTER ON EUROVIGNETTE

Dear EU Ministers,

You have been approached by various stakeholders to put pressure on the Eurovignette debate. As the world's road transport organisation, IRU represents nearly one million road transport companies in Europe. We are deeply concerned about the current debate and urge you not to push the discussion, at least until it is based on the right principles. We are in favour of a road infrastructure charging framework that incentivises cleaner and more efficient road transport. However, IRU is deeply concerned that the proposed directive focuses on tailpipe emissions. Basing an incentive on CO₂ differentiation at the tailpipe makes no sense and all alternative fuels should benefit from lower charges or toll exemption.

CO₂ differentiation at the tailpipe would only benefit battery electric trucks exclusively, which are not yet a viable option for long-distance transport. Battery electric trucks are a good solution for urban distribution, so those vehicles will in any case not benefit from such a policy. Road transport operators call for a true enabling policy framework, which is technology-neutral and supports all alternative fuels, including electric, CNG, LNG and, in the future, hydrogen.

Therefore, in light of the ongoing discussions to come to a Council agreement on the Eurovignette Directive, IRU would like to reiterate some of its key concerns and make proposals for further consideration by Member States.

CO₂ differentiation of charging rates should not favour any technology

A policy framework based on tailpipe emissions is biased. We call for a well-to-wheel policy approach, which should be used in the revision of the CO₂ truck standard in 2021.

Using a tailpipe rather than well-to-wheel approach will provide undue advantages to battery electric technology compared to other alternative fuels, which may offer better CO₂ reduction potential to commercial goods and passenger transport, especially for long-distance and heavy-duty operations.

Energy efficiency remains important, but well-to-wheel cannot be disregarded. Until well-to-wheel becomes a reality, all alternatives should be equally treated, low and zero carbon fuels used in gas or diesel engines.

Double charging has to be avoided with any introduction of CO2 as an external cost because a number of Member States already have already introduced a CO2 component in their fuel taxation.

No increase in taxes, charges and duties for transport operators

Heavy goods vehicles already pay more than 130% of their infrastructure and external costs via existing taxes, charges and duties.

IRU considers that road user and external cost charging should be revenue neutral. The Eurovignette Directive should be used primarily **to incentivise the introduction of cleaner and more efficient technologies in the commercial road transport sector**, instead of just making commercial road transport more expensive or cross-subsidising non-road modes of transport. Concretely, we propose the following:

- Collective bus and coach transport should be excluded from the scope of the Eurovignette Directive.
- The provisions of the current directive relating to mark ups should remain unchanged and their combination with external cost charges should not be possible. Maximum values for external costs and existing congestion variations should not be replaced by reference or even minimum values.

No new externalities should be introduced

IRU welcomes the recent reluctance of Member States to support the recognition of congestion as an external cost. Commercial road transport operators already bear the heavy cost of congestion and should not have to pay twice.

Moreover, collective passenger transport should be seen as a solution for solving environmental issues rather than being penalised. **No congestion charge should be introduced for commercial road freight and passenger transport.**

Competitive level playing field should be addressed

In countries where charges have been introduced for heavy goods vehicles, there has been an increase in the use of vehicles that do currently not fall within the charging scope, including vans. Therefore, **the threshold for light goods vehicles should be lowered from 3.5 tonnes to 2.5 tonnes** in order to ensure compatibility with the Mobility Package 1 rules. The entry into force in terms of dates should also be in line with the Mobility Package 1 rules.

IRU invites you to thoroughly consider these principles and proposals. There is no need to rush the decision and we would like to support the debate. Any CO2 differentiation at the tailpipe has to be avoided and would lead to market distortion and deprive operators to make an effort in the fight on climate change, which requires better and low carbon fuels in the first place.

IRU remains entirely at your disposal to further discuss the Eurovignette, and to provide additional information to build the right and enabling policy framework. I look forward to hearing from you regarding this important matter.

Yours sincerely,



Raluca Marian

IRU General Delegate to the EU