



Brussels, 6 May 2019

**Eurovignette Directive (1999/62/EC) on road charging:
Electro-Mobility Platform comments on the Council Presidency compromise text of
17 April 2019 drafted for further discussion in the Working Party on Land Transport**

On 31 May 2017, the European Commission published a [proposal](#) for a revised Eurovignette Directive, which defines how Member States can toll certain vehicles for their use of road infrastructure. The Directive's review offers an opportunity to make road tolls better reflect the 'user pays' and 'polluter pays' principles, in accordance with the 2011 Transport White Paper, via financial incentives for decarbonisation and specifically electrification of transport, but also via rules in support of distance-based charging. Revising and updating EU rules on road charging is important for reducing road's emissions of CO₂, air pollution and noise, for encouraging the uptake of zero-emission vehicles (ZEVs) on Europe's roads and for promoting fair competition between different transport modes.

The Electro-Mobility Platform welcomes the general ambition of the Commission proposal, Parliament's [first-reading position](#) of 25 October 2018 and the fact that Council is now discussing the proposal in detail. The Platform made specific [comments and proposals](#) on 18 March 2019, ahead of the Council Presidency's first compromise text of 1 April, prepared for discussions in the Working Party on Land Transport on 8 and 12 April. Today the Platform wishes to comment on the Council Presidency's revised [compromise text of 17 April](#).

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In the Electro-Mobility Platform's view, **the following key items should be improved with high priority** in the Council's latest draft:

1) External-cost charging

1a) on art. 7c.5: make external-cost charging mandatory for HDVs wherever they are tolled, i.e. instead of further weakening the Commission's already weak proposal on this, better go for Parliament's [proposed amendment 68](#).

There is a sound logic to Parliament's proposal: Where tolling infrastructure is installed anyway, there is no reason not to use it also for external-cost charging, in support of polluter-pays – a principle enshrined in the Treaty (TFEU art. 191.2).

1b) on art. 7g.1f: "external-cost charge" should not be added here as a choice that would rule out varying the infrastructure charge.

For the external costs in question (air pollution, noise, potentially also CO₂) arise irrespective of congestion or infrastructure damage – whose reduction would be the purpose of varying the



infrastructure charge, according to the article's first paragraph. External costs are not related to this and therefore should not restrict variations of infrastructure charges.

2) CO₂ variation of tolls

2a) In art. 7g.4, on HDVs, the toll reduction for "CO₂ emission class 4 - zero-emission vehicles" (ZEVs) should amount to 75% and not less. Therefore, "up to" should be removed in "up to 75% reduction". This would give appropriate incentives for the swift uptake of ZEVs.

2b) This 75% reduction for heavy-duty ZEVs should apply from the date of entry into force of the directive (as was proposed in the initial Council draft of 1 April 2019).

For the carbon-free nature of ZEVs is independent of the proposed Commission implementing act that would specify the reference values of CO₂ emissions. Therefore, to introduce ZEV discounts there is no reason to wait for the implementing act.

2c) In art. 7ga, on LDVs, the CO₂ variation of tolls should remain mandatory ("shall"), as proposed by the Commission. As in the case of HDVs, this would ensure appropriate incentives for the swift uptake of light-duty ZEVs.

3) Distance-based infrastructure charging

As per art. 7.6 and 7.7 of the Commission proposal, distance-based infrastructure charging should replace time-based charging as quickly as possible (e.g. from 2024 for HDVs), in support of user-pays. Therefore, instead of weakening the Commission's related proposal, better leave it untouched or ideally even go for Parliament's [proposed amendment 59](#).

Additionally, from the Electro-Mobility Platform's earlier [comments and proposals](#), ideally the following items should be addressed as well: 1, 2, 4, C and D.

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The EU should encourage tolls as a smart taxation system promoting sustainable transport behaviour. The Council is therefore called upon to support the items listed above.

The Electro-Mobility Platform unites organisations from across civil society, industries, and transport modes. Its members are committed to promote electro-mobility and strive to collectively develop solutions to electrify European transport, and to promote those solutions to the EU institutions and Member States.

Website: www.platformelectromobility.eu