

The charging of the use of road infrastructure

Part I. About you

<p>In what capacity are you completing this questionnaire? -single choice reply-(compulsory)</p>	<p>On behalf of an industry association or a non-governmental organisation (NGO)</p>
<p>Is your association/organisation registered in the Transparency Register of the European Commission http://europa.eu/transparency-register/index_en.htm ? Your contribution will be considered "as a citizen" if your organisation is not registered in this register -single choice reply-(compulsory)</p>	<p>No</p>
<p>What is the name of the company, organisation or authority? -open reply-(compulsory)</p>	<p>ITD - Trade Association for the Danish Road Transport of Goods</p>
<p>Please specify your main country of operations or residence. For international or European organisations, please choose "international". -single choice reply-(compulsory)</p>	<p>Denmark</p>
<p>Please specify which interests you (the organisation on behalf of which you respond) represent (multiple answers possible) -multiple choices reply-(compulsory)</p>	<p>Road freight transport - Intermodal transport</p>
<p>Comments -open reply-(optional)</p>	

Part II. Problems

Problem 1: Financing gap

<p>Insufficient and inefficient maintenance of EU transport infrastructure</p> <p>In recent decades, public spending on transport infrastructure in relation to GDP has decreased considerably (from 1.5% to 0.8%). Together with the priority often given to building new infrastructure over the maintenance of existing infrastructure when allocating scarce public funds, this has resulted in a chronic state of underinvestment on the existing network.</p> <p>The economic crisis and the Stability Pact have put</p>	<p>Denmark</p>
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<p>additional constraints on the possibility of financing the maintenance of infrastructure from increased public debt and/or tax payer's money. Higher fuel efficiency and increasing use of fuels other than petrol and diesel will also reduce governments' income from fuel excise duty, the revenue of which may be regarded as partly paying for the infrastructure costs.</p> <p>The urgency of finding new sources of funding has triggered debates in an increasing number of EU Member States, and at the European level, on the possibility in the future to rely less on tax payers and more on road charging for the financing of transport infrastructure.</p>	
<p>1. Please select the country which you know best. (can be your country of establishment or another country)</p> <p>-single choice reply-(compulsory)</p>	
<p>transport infrastructure in your country (all modes)</p> <p>-single choice reply-(compulsory)</p>	3
<p>road infrastructure in your country</p> <p>-single choice reply-(compulsory)</p>	3
<p>rail infrastructure in your country</p> <p>-single choice reply-(compulsory)</p>	2
<p>transport infrastructure in the EU in general (all modes)</p> <p>-single choice reply-(compulsory)</p>	3
<p>road infrastructure in the EU in general</p> <p>-single choice reply-(compulsory)</p>	3
<p>rail infrastructure in the EU in general</p> <p>-single choice reply-(compulsory)</p>	3
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>Danish state owned roads are well maintained. Especially for municipal roads there is a huge maintenance backlog, which represents 15-20 billion DKK estimated in 2012.</p>	
<p>3. Do you agree that, given the important role of transport networks for enabling economic activities, appropriate funds must be secured to maintain the transport infrastructure in good condition?</p> <p>-single choice reply-(compulsory)</p>	Strongly agree
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>Commercial road transport has become a vital production and mobility tool for the European economy and society. In terms of infrastructure, free-flowing traffic should be ensured through adequate investment in new infrastructure, to remove bottlenecks and missing links and make full use of existing infrastructure. Road hinterland connections to intermodal terminals should be improved and a</p>	

network of (secure) truck parking areas should be put in place. It is important that revenues from road tolls and user charges are earmarked to road transport projects aimed at reducing the environmental footprint at source. Cross-subsidisation to other transport modes is unacceptable

4. Do you agree that users of the transport infrastructure, rather than tax payers, should cover the costs related to the maintenance of the transport infrastructure (i.e. in accordance with the 'user pays' principle)?

-single choice reply-(**compulsory**)

Somewhat agree

Comments

-open reply-(**optional**)

Professional users of the road infrastructure are also general tax payers. Road freight transport operators are willing to pay for the use of road infrastructure, but the rules must be fair, transparent and non-discriminatory. There should be no double payment and no overall increase in the tax burden for the road transport operators. Revenues from tolls and user charges should be earmarked to road transport projects aimed at reducing the environmental footprint at source. Cross-subsidisation to other transport modes is unacceptable. As road freight transport only represent about 10% of all road users, it is essential that the main road users, being the private car, also pay for their use of the road infrastructure on the same basis as road freight transport. In addition, all freight transport modes should pay for the use of their infrastructure. It cannot be expected that revenues from road infrastructure charging are used to cross-subsidise other modes.

5. Do you think that the introduction of road charges should be (partly) compensated by the reduction in other taxes and charges (vehicle taxation, labour charges, VAT on transport,...) ?

-single choice reply-(**compulsory**)

Strongly agree

Comments

-open reply-(**optional**)

The introduction of tolls or user charges with or without the internalisation of external costs should not increase the overall tax burden on the road freight transport industry. Fiscal neutrality should be respected, so compensations in other road transport related direct or indirect taxation is necessary.

6. Concession motorways (motorways operated under Public-Private Partnership agreements, wide-spread mostly in the South of the EU) are an example of infrastructure where the user-pays principle is applied (the cost of the construction and maintenance of the infrastructure are covered by the users, and toll revenues are earmarked to the charged network). Do you see any difference between the quality of the maintenance of concession motorways and other motorways?

-single choice reply-(**compulsory**)

I don't know / No view

Comments

-open reply-(**optional**)

In Denmark we have only one motorway build and operated under PPP, but not paid by users (paid by the state). The Kliplev-Sønderborg motorway opened this year and therefore we have no experience with maintainance so far. Øresund and Great Belt bridges are build and operated under PPP, but we have not identified any differencies in maintainance...

Problem 2: Fair and efficient use of road transport infrastructure

Congestion

Yes, on the suburban and the inter-urban network

The cost of congestion (delay in the travel time caused by high traffic levels compared to a free flow situation) for the economy and society in the EU are estimated to amount to 1% of GDP on average, while in the more densely populated central regions of the EU the figure is closer to 2% of GDP. Congestion is not only an urban phenomenon: it extends to the entry and exit roads from the cities; inter-urban highways in heavily urbanised or industrialised areas; mountain crossings; roads with heavy transit traffic; roads under reconstruction; other roads with important tourist traffic; etc. Users of non-urban roads in areas such as South-East England, the Ruhr Region, the Benelux countries and the surroundings of main cities across Europe experience regular and frequent traffic jams.

The EU legislation on road charging concentrates on the inter-urban network, leaving congestion management in cities in the hands of local authorities.

7. In addition to being a problem in city centres, do you think that congestion on the inter-urban and suburban network is a major social and economic problem? The suburban network is defined, for the purpose of this questionnaire, as lying inside the less densely populated part of a large urban area (which can be within or outside the administrative boundaries of the city).

-single choice reply-(compulsory)

Comments

-open reply-(optional)

Congestion is a problem on parts of the urban, suburban and inter-urban network whether on the motorway or secondary roads. It is essential to determine what the root causes of the congestion on different parts of the road network are, before determining what measures to take to reduce congestion. Road freight transport only represents about 10% over all road users (based on figures from Member State surveys), and operators do not always have the freedom to decide when to use the road network and which roads to take.

8. Would you be in favour of charges for the use of the congested parts of the interurban road network during peak hours if it eased congestion problems?

-single choice reply-(compulsory)

No, I am against charging for the use of congested infrastructure in peak hours, even if it would ease congestion problems

Comments

-open reply-(optional)

Firstly, it should be examined how other solutions than a congestion charge could solve congestion. Often, heavy goods vehicles do not have a choice when they use the road infrastructure as much depends on the requests of the customer and access restrictions to loading and unloading areas. Often, there are also traffic bans for freight transport during less congested periods such as during night time. More alternatives to use the infrastructure during off-peak periods, such as during the night, should be made available for trucks. In addition, surveys undertaken by Member States such as the Netherlands and Germany indicate that heavy goods vehicles only represent about 10% of all road users. Making 10% of road users pay more to solve congestion mainly caused by other road users will not solve anything. Before deciding on who should pay more and how much, an in-depth examination should be undertaken on which road users mainly cause of the congestion problem. Finally, the costs of congestion are already born by road freight transport operators through time loss, additional fuel consumption and working hours, so road freight transport operators have an interest to avoid congestion.

9. If there were significant charges for the use of

I don't know

inter-urban roads during peak hours on your holiday/leisure route, would you be inclined to adapt your travel choices by: <i>(Several answers possible)</i> -multiple choice reply- (compulsory)	
Comments -open reply- (optional)	
Depends on the alternatives - if there is any??	
10. In your opinion, what would be the minimum level of additional inter-urban road charges during peak hours which would make people travel outside peak hours or choose another mode of transport than the car on an average 500 km holiday route: -single choice reply- (compulsory)	I don't know
Comments -open reply- (optional)	
Depends on alternatives - if there are any???	
11. Would you be inclined to adapt your commuting habits to avoid peak hour charging on urban and suburban roads? -single choice reply- (compulsory)	I don't know
Comments -open reply- (optional)	
Depends on the market.	
12. In your opinion, what would be the minimum level of additional urban and suburban road charges during peak hours which would make people not using their car in peak hours for commuting (opting for one of the alternative solutions listed in the previous question) on an average one-way 10km commuting distance? -single choice reply- (compulsory)	I don't know
Comments -open reply- (optional)	
depends on their alternatives available...	
13. How much would, in your opinion, heavy goods vehicles need to be additionally charged (average additional cost/km) during peak hours for them to use the roads during off-peak hours instead? -single choice reply- (compulsory)	I don't think that additional road charges would incentivise heavy goods vehicles not to use the roads during peak hours.
Comments -open reply- (optional)	
Often, heavy goods vehicles do not have a choice when they use the road infrastructure as much depends on the requests of the customer and access restrictions to loading and unloading areas. Often, there are also traffic bans for freight transport during less congested periods such as during night time. In addition, surveys undertaken by Member States such as the Netherlands and Germany indicate that heavy goods vehicles only represent about 10% of all road users. Making 10% of road users pay more to solve congestion mainly caused by other road users will not solve anything. Before deciding on who should pay more and how much, an in-depth examination should be undertaken on which road users mainly cause of the congestion problem.	

14. To what extent do you believe that additional charges in peak hours on heavy goods vehicles would contribute to modal shift (greater use of alternative modes such as short sea shipping, rail and inland waterways)?

-single choice reply-(**compulsory**)

No shift

Comments

-open reply-(**optional**)

There are no real alternatives to road freight transport in Denmark (short distances, rail is prioritized for passenger transport)

Environmental impacts

Yes

Transport-related air pollution causes damage to humans, the biosphere, soil, water, buildings and materials. The most important pollutants from road transport are particulate matter (PM_{10} , $PM_{2.5}$), the breathing in of which has serious impacts on human health, carbon monoxide (CO) and nitrogen oxides (NO_x). New vehicles marketed in the EU must respect increasingly stringent mandatory emission norms (so-called EURO classes), but the impact of those standards on overall pollution levels is delayed given the relatively slow rate of replacement of the fleet. Moreover, in spite of these standards, vehicles will continue to emit pollutants, even if at lower levels, in particular small particulates with detrimental effects on health. Also the noise generated by transport has a proven negative impact on the health of exposed human populations. Currently, EU legislation gives the possibility (but not the obligation) of introducing a noise and/or air pollution component in the tolls (distance charges) collected, subject to maximum values defined in the legislation.

Transport is also an important source of greenhouse gas (GHG) emissions, and the only economic sector where these emissions are still growing. Road transport accounts for just below $\frac{3}{4}$ of the total GHG emissions from transport in the EU. Increased levels of GHG emissions are the main factor responsible for climate change. Energy taxation is often regarded as a cost-efficient way to charge for the costs of climate change. In practice in most Member States such taxation has no explicit component related to climate change. A Commission proposal to review the Energy Taxation Directive, currently discussed in the Council of the European Union, is however proposing the clear separation of the CO₂ component of fuel taxes.

15. Do you agree that vehicles should be charged for the environmental costs which they generate (i.e. in accordance with the 'polluter pays' principle)?

-single choice reply-(compulsory)	
For what costs should vehicles then be charged? (Multiple answers possible) -multiple choices reply-(compulsory)	For air pollution - For noise
Comments -open reply-(optional)	
Double charging shall be avoided - CO2 is already covered by far by diesel taxation	
<p>Consistent price signals</p> <p><i>By putting a price on the social costs generated by transport users (notably the costs of infrastructure damage, congestion, noise and air pollution, and potentially climate change), road charges should in principle guide the users towards more sustainable transport choices. The variety of the pricing systems in the Member States (different vehicle coverage, average charge level, types of costs covered, network coverage, etc.) means however that users receive conflicting price signals depending on the country and route on which they travel. For instance, a heavy goods vehicle driving on a German motorway will pay an infrastructure charge in the range of 14-29 cents/km (depending on the vehicle class), but would not pay any charge on a parallel motorway in the neighbouring French region of Alsace. In Belgium, the same driver wouldn't be asked to pay a toll per km, but a fixed charge that would give him unlimited access to the road network during a defined period of time. The differences in the levels of (annual) vehicle taxation add to the confusion.</i></p> <p><i>Examples of inconsistent and misleading price signals can also be observed at the national level. A heavy goods vehicle travelling from Lille to Paris is charged a toll on the relatively uncongested part of the motorway in a rural area until the toll booth in Senlis, but is not charged at all on the most congested and expensive to build stretch just before Paris.</i></p> <hr/> <p>16. Do you think that the differences in the type of charges and vehicle taxes between Member States distort competition between hauliers in the internal market?</p> <p>-single choice reply-(compulsory)</p>	Significantly
Comments -open reply-(optional)	
Differences lead to severe distortion between the industries situated in central EU and peripheral countries, leads to non transparent freight costs for transport operators and leads to increased administration costs and total transport costs.	
17. Evidence collected in the past suggests that the introduction of a new tolling scheme results in the diversion of traffic to parallel, uncharged routes.	Somewhat disagree

<p>Do you agree that road charges on parallel routes must be coordinated – both within and between Member States – to avoid such traffic re-routing?</p> <p>-single choice reply-(optional)</p>	
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>The choice of routes does not always depend on the cost for using the route, but on the speed, time, pick up and/or delivery location. Using a route subject or not to tolls or charges could lead to a serious detour which has a negative impact on the costs, efficiency and the environment; it could also be the most suitable route to take. This depends on the circumstances and the requests of the client.</p>	
<p>18. Do you agree that road charges should send stronger and more precisely targeted price signals to use cleaner vehicles?</p> <p>-single choice reply-(compulsory)</p>	<p>Somewhat agree</p>
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>Already today, in countries where tolls or user charges vary according to the Euro class of the vehicle, operators will always try to invest in and use vehicles subject to the lowest toll or user charge rates. However, the required investments, the opportunities arising from them and legal certainty should be guaranteed for a reasonable period of time in order to allow return on investments for road freight transport operators. So no additional targeted price signals are needed.</p>	
<p>Problem 3: Patchwork of Road Charging Systems in Place</p>	
<p>Lack of technical harmonisation of road charging</p> <p><i>Charges for heavy goods vehicles to use roads exist in a majority of Member States. However, despite some harmonising effects of EU legislation, there is still a patchwork of incompatible systems. Today, international hauliers need the Eurovignette, four different national vignettes and 11 different tags and tolling contracts to drive unhindered on EU roads. It has been frequently reported to the European Commission that this situation is the source of significant administrative burden.</i></p>	<p>High</p>
<p>19. At what level would you estimate the administrative costs and burden caused to hauliers by the lack of harmonisation of road charging systems in Europe?</p> <p>-single choice reply-(compulsory)</p>	
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>Lack of interoperability forces operators active on the intra-EU market to sign contracts with different service providers, pay various administrative fees, buy various on-board units, receive different bills and deal with multiple suppliers of maintenance services.</p>	
<p>20. Would you say that the lack of interoperability of electronic tolling systems is a particular problem?</p> <p>-single choice reply-(compulsory)</p>	<p>Yes</p>
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>Therefore one of our demands for the coming Danish GPS based road tax for trucks are interoperability with especially Germany...</p>	

21. Should toll booths be replaced by barrier-free electronic tolling? -single choice reply-(compulsory)	It depends (specify the conditions)
Please specify the conditions -open reply-(compulsory)	
If this provides clear benefits in terms of cost reductions, reduced administrative burdens and time savings...	
Comments -open reply-(optional)	
22. Do you think that European toll services, i.e. services offering the possibility to use all tolled roads with one contract and one on-board unit, should be made available on all tolled roads? -single choice reply-(compulsory)	Yes, for all vehicles, including cars, if it doesn't result in any increase in tolls
Comments -open reply-(optional)	
23. Do you think that toll operators should be obliged to offer European toll services? -single choice reply-(compulsory)	Yes, for all vehicles, including cars
Comments -open reply-(optional)	
24. One of the main reasons for which governments hesitate to introduce electronic tolling schemes is the high operating cost of such systems. Do you expect the cost of collecting tolls under an electronic toll system (set-up, operation and enforcement) to decrease in the next 10 years? If yes, by how much? -single choice reply-(compulsory)	They will decrease, but I don't know by how much
Comments -open reply-(optional)	
Countries like Denmark tends to follow the operating cost levels identified in countries already implemented electronic tolling	
25. In your opinion, would greater technical harmonisation of road charging systems in Europe help reduce the operating costs of electronic tolling systems? -single choice reply-(compulsory)	Substantially
Comments -open reply-(optional)	
EU should as soon as possible define technical standards in order to decrease costs of electronic tolling systems.	
Problem 4: Transparency in levying charges and setting tariffs	
The ' <i>Eurovignette</i> ' Directive put in place a mandatory common methodology for calculating the infrastructure	Don't know / No view

costs which serve as a basis for setting tolls for heavy goods vehicles. It also established maximum values for the prices of daily, weekly, monthly and yearly HGV vignettes. Thanks to these provisions, a minimum level of transparency in the way road charges for trucks are established and changed is ensured; still, tolling arrangements on concessions which existed before 2008 are not subject to those obligations.

The situation is even more problematic in the case of vignettes and tolls applying to cars and other light vehicles, for which no specific EU legislation exists. Cases of abusive practices and discrimination of occasional users are frequently reported.

26. Usually car users are less responsive than hauliers to the price signals created by road tolls. It is sometimes stated that they lack a clear picture of the tolling costs associated with a trip. How do you feel informed about such costs?

-single choice reply-(compulsory)

Comments

-open reply-(optional)

27. Should the rationale behind the level of road tolls and vignette prices be explained in a more transparent manner?

Do you think that users should be consulted directly or indirectly (through professional organisations which represent their interests) when toll levels/vignette prices are modified?

-single choice reply-(compulsory)

Yes, the information should be provided in a more transparent manner and users should be consulted when toll levels are modified

Comments

-open reply-(optional)

Any toll or user charge system should be based on clear, transparent and non-discriminatory rules. Revenues must be earmarked to road transport projects at source, including the maintenance of existing and construction of new infrastructure and there should be an obligation to inform users in a transparent way how revenues are spent. Any changes must be published sufficiently in advance (ideally a year), for commercial operators to take them into account in their contract negotiations and price setting.

28. Would you like to recommend specific measures to improve the transparency in the levying of charges and the setting of tariffs?

-open reply-(optional)

29. Are you aware of situations where road users are regularly exposed to problems or discriminatory treatment related to road charging in the EU?

-single choice reply-(compulsory)

Yes

29a. Please indicate what kind of situations you are referring to.

(Multiple answers are possible)

-multiple choices reply-(compulsory)

Situations of discriminatory treatment - Situations of disproportionate rates being applied - Situations of no proper

	<p>access to information - Situations where the collection and the payment is too complicated and leads to loss of time -</p> <p>Situations where enforcement practices are not appropriate</p>
<p>Please describe these situations of discriminatory treatment</p> <p>-open reply-(compulsory)</p>	
<p>In some Member states, not all hauliers are subject to tolls or user charges as hauliers registered in some third countries are exempted on the grounds of bilateral agreements.</p>	
<p>Please describe these situations of disproportionate rates being applied</p> <p>-open reply-(compulsory)</p>	
<p>Situation in the Alps contains several examples on tolling not proportional with real costs</p>	
<p>Please describe these situations of no proper access to information</p> <p>-open reply-(compulsory)</p>	
<p>Information on how systems are operated is often not or only later available in other languages than the official language(s) of a given Member State which makes it more difficult for foreign transport operators to prepare for a new situation. Online registration is often problematic. In case of system failure, there is often a lack of information for users on alternative means to pay the toll or user charge, which leads to non-payment and unjustified penalties. The german example could be followed (relevant information available in 17 languages on www.toll-collect.de)</p>	
<p>Please describe these situations where the collection and the payment is too complicated and leads to loss of time</p> <p>-open reply-(compulsory)</p>	
<p>.</p>	
<p>Please describe these situations where enforcement practices are not appropriate</p> <p>-open reply-(compulsory)</p>	
<p>Enforcement of the Danish vignette is not appropriate.</p>	
<p>Comments</p> <p>-open reply-(optional)</p>	
<h2>Part III. Possible ways of implementing road charges</h2>	
<p>Developing and/or maintaining national road infrastructure</p> <p>-single choice reply-(optional)</p>	1
<p>Sustainable transport, including public transport and transport research</p> <p>-single choice reply-(optional)</p>	5
<p>A European transport fund for developing and maintaining transport infrastructure of European importance</p> <p>-single choice reply-(optional)</p>	4
<p>Reduction of transport taxes (e.g. vehicle taxes, fuel duties)</p> <p>-single choice reply-(optional)</p>	3
<p>Reduction of labour taxes</p> <p>-single choice reply-(optional)</p>	2

Fiscal consolidation -single choice reply-(optional)	
Other (please specify) -single choice reply-(optional)	
If you chose "Other", then please specify. -open reply-(optional)	
30a. If you chose "developing and/or maintaining national road infrastructure": Would the binding obligation for Member States to adequately maintain the charged road network be a satisfactory alternative to mandatory earmarking? -single choice reply-(optional)	No
Comments -open reply-(optional)	
Revenues of user charges or tolls should be earmarked to any road transport related project which aims either at maintaining existing or building new road infrastructure or which reduces the environmental footprint of road transport at-source. Cross-subsidisation should not be allowed	
Restructuring taxes and charges towards fuller application of the 'user pays' principle <i>Road users pay a lot of taxes, such as registration taxes, annual circulation taxes, fuel excise duties or VAT, although different taxes apply in different countries. It is often argued that the fuel excise duty alone is at a level which would be enough to cover the main external costs of road transport. However, due to the character of general taxation, current taxes fail to sufficiently steer users towards more sustainable behaviour such as using infrastructure outside of peak hours, using cleaner vehicles or using public transport. The various existing charges and taxes should be restructured in the direction of the wider application of the 'user-pays' and 'polluter pays' principles, to achieve a system where the payment has a direct link to the level of costs generated by the transport user.</i>	Don't know
31. In your view, which of the following would best lead to the fuller application of the 'user pays' principle? -single choice reply-(compulsory)	
Comments -open reply-(optional)	
Today, Member States apply various ways to cover infrastructure use, but are not always transparent on the size of the contributions of the different road users and how they are spent. Member States also have no obligation to spend revenues on road transport related projects. It is essential that more transparency on who pays how much and where is established before any other alternative to the current situation is proposed. Several Eurovignette Directive modifications have indicated that Member States have no interest in creating transparency and in changing the current situation. It would be absolutely unacceptable to introduce a better application of "the user pays principle" which leads to an increase of the overall fiscal burden on commercial road transport operators. Fiscal neutrality should be respected.	
32. Would you support the introduction of new road	Yes

charges if they were partly compensated by the general reduction of other taxes? -single choice reply-(compulsory)	
32a. Which taxes should be reduced? -multiple choices reply-(compulsory)	Annual vehicle taxes - Fuel excise duties - Other (please specify)
Please specify "Other" -open reply-(optional)	
Any tax, duty or charge that currently covers the use of road infrastructure and the internalisation of externalities.	
Comments -open reply-(optional)	
New road charges, taxes and duties should be fully compensated in order to respect fiscal neutrality, not partly.	
33. Please indicate if you have any views on the proportion of new road charges that should be used to reduce other taxes -open reply-(optional)	
Cost components of road charges <i>The observed differences in the road charging systems in the EU partly reflect the lack of consensus on the costs to be covered. EU legislation makes the link to infrastructure costs mandatory for charging schemes on the main inter-urban network, but not the internalisation of the costs of noise and air pollution, which remains optional. Tolls (distance-based charges) can be modulated to reflect congestion. However current legislation as regards charging of heavy goods vehicles requires the recalculation and adjustment of the toll rate every two years to ensure revenue neutrality (i.e. that the revenue raised as a result of such charging should not increase). Applying congestion charges based on congestion costs that would allow an increase in the revenue taken are not allowed. The cost of climate change and of the external part of the cost of accidents cannot currently be internalised through road charges. In relation to the external cost of accidents, however, there is broad consensus that they are better internalised through insurance premiums.</i>	Always
34. Should road charges for heavy goods vehicles reflect the cost of wear and tear? -single choice reply-(compulsory)	
Comments -open reply-(optional)	
35. Should road charges for heavy goods vehicles reflect the cost of air pollution? -single choice reply-(compulsory)	Sometimes (specify in which case)
Please specify	

-open reply-(compulsory)	
<p>Certain conditions should be attached to including the cost of air pollution. The rules must be fair, clear, transparent and non-discriminatory. Rates must be reduced with improvements in air quality. Revenues must be earmarked to reduce the environmental footprint of road transport at source. Double charging to cover costs for air pollution caused by toxic or non-toxic emissions is unacceptable. All modes must be charged for their air pollution costs.</p>	
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>36. Should road charges for heavy goods vehicles reflect the cost of noise pollution?</p> <p>-single choice reply-(compulsory)</p>	<p>Sometimes (specify in which case)</p>
<p>Please specify</p> <p>-open reply-(compulsory)</p>	
<p>Certain conditions should be attached to including the cost of noise. The rules must be fair, clear, transparent and non-discriminatory. Rates must be reduced with improvements in sound levels of vehicles. Revenues must be earmarked to reduce the environmental footprint of road transport at source. Double charging to cover costs for noise emissions is unacceptable. All modes must be charged for their air pollution costs. All modes must be charged for their noise costs.</p>	
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>37. Should road charges for cars and other light vehicles reflect the cost of wear and tear?</p> <p>-single choice reply-(compulsory)</p>	<p>Always</p>
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>38. Should road charges for cars and other light vehicles reflect the cost of air pollution?</p> <p>-single choice reply-(compulsory)</p>	<p>Always</p>
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>39. Should road charges for cars and other light vehicles reflect the cost of noise pollution?</p> <p>-single choice reply-(compulsory)</p>	<p>Always</p>
<p>Comments</p> <p>-open reply-(optional)</p>	
<p>40. Should external costs other than air and noise pollution be internalised through road charges?</p> <p>-single choice reply-(compulsory)</p>	<p>No</p>
<p>Comments</p> <p>-open reply-(optional)</p>	

41. Should road users pay for driving in peak hours? -single choice reply-(compulsory)	No
Comments -open reply-(optional)	
As there in many cases are no alternatives, hauliers already pay extra costs for delays due to congestions	
42. If congestion charging were introduced, what form should it take? -single choice reply-(compulsory)	A charge that varies by time, but overall revenues should not be allowed to increase (as is currently the case under the 'Eurovignette' Directive revised by Directive 2011/76/EU)
Comments -open reply-(optional)	
The costs of congestion are already born by road freight transport operators through time loss, additional fuel consumption and working hours, so road freight transport operators have an interest to avoid congestion. In addition, surveys undertaken by Member States such as the Netherlands and Germany indicate that heavy goods vehicles only represent about 10% of all road users. Making 10% of road users pay more to solve congestion mainly caused by other road users will not solve anything. Before deciding on who should pay more and how much, an in-depth examination should be undertaken on which road users mainly cause of the congestion problem.	
43. Where road users have to pay for driving in peak hours, should the charge apply to all vehicles? -single choice reply-(compulsory)	No
43a. Please specify to which vehicles it should not apply and why -open reply-(compulsory)	
As indicated earlier, congestion charges should not apply to road freight transport as road freight transport operators often do not have the choice to drive during peak hours and do not have the possibility to pass these costs on to clients. Congestion charges should apply to those who have an alternative to using the road infrastructure during peak hours	
Comments -open reply-(optional)	
It should first be examined if other solutions cannot alleviate congestion problems such as promoting and offering better collective passenger transport or better access to loading and unloading for road freight transport during off-peak hours. Introducing congestion charging as being prepared in Denmark at the moment - as a way to obtain more revenue for the general treasury - is not acceptable.	
44. Should construction costs be recovered through road charges? -single choice reply-(compulsory)	No
Comments -open reply-(optional)	
Where construction costs are recovered through road charges, it is important that revenues from road tolls and user charges are earmarked to road transport projects aimed at reducing the environmental footprint at source. Cross-subsidisation to other transport modes is unacceptable	
Maximum toll values <i>In order to protect occasional users from discrimination, EU legislation provides for maximum levels of time-based charges (vignettes) applicable to heavy goods vehicles and specifies the maximum ratios between the prices of long-term and short-term vignettes. The Commission has made recommendations concerning vignettes for cars which go in a similar direction, but these recommendations</i>	I don't know / No view

have no binding effect. EU legislation also provides a common methodology to be used for calculating infrastructure costs and puts caps on the optional environmental charges.

The different cost estimates and methodologies have not been reviewed – even to reflect increases in inflation – since the adoption of the relevant pieces of legislation (for the infrastructure costs, this legislation dates back to 1999).

45. Should the methodology to calculate infrastructure costs (Annex III to the 'Eurovignette' Directive) be improved?

-single choice reply-(compulsory)

Comments

-open reply-(optional)

46. Should the caps on external cost charges introduced by Directive 2011/76/EU be adjusted to inflation and/or updated to reflect the progress achieved in assessing the external costs of transport?

-single choice reply-(compulsory)

I don't know / No view

Comments

-open reply-(optional)

47. In mountainous regions, the external cost charge can be up to 100% higher than the caps introduced by Directive 2011/76/EU. In some cases, this is however still not enough to reflect the full environmental costs of transport in such areas. In that light, do you think that the caps on external cost charges should be removed to allow higher tolls in the most vulnerable areas and areas most exposed to pollution (e.g. the Alps, heavily urbanised areas, etc.)?

-single choice reply-(compulsory)

No

Comments

-open reply-(optional)

48. Do you think that the EU should define rules on vignette prices to avoid discrimination against occasional users (e.g. the price of the weekly vignette cannot exceed 5% of the price of the yearly vignette)?

-single choice reply-(compulsory)

Yes

Comments

-open reply-(optional)

Priorities at EU level

Yes

The questions presented in this final section come back to the issues addressed by the questions above to see where the priority needs for coordinated action in Europe should be.

49. Is more coordinated action needed in Europe to secure the financial sustainability of transport infrastructure?

-single choice reply-(**compulsory**)

Comments

-open reply-(**optional**)

Transparency should be created on who pays, through what and how much for the use of infrastructure and internalisation of externalities. Revenues from these taxes, duties and charges must be earmarked back to the mode paying them and used amongst others to maintain existing and build new infrastructure. All transport modes and users should pay for the use of their infrastructure and have their externalities internalised. Cross-subsidisation cannot be allowed.

50. Is more coordinated action needed in Europe to effectively promote sustainable transport and hence help Member States to tackle the problems of congestion and pollution?

-single choice reply-(**compulsory**)

Yes

Comments

-open reply-(**optional**)

51. Should measures be taken to ensure a convergence of the different road charging schemes in Europe and to avoid traffic detours, administrative burden, distortion in the internal market and other negative impacts (please specify)?

-single choice reply-(**compulsory**)

Yes

Please specify and comments

-open reply-(**optional**)

52. Should measures be taken to accelerate the move toward more consistent road charging in Europe, based on the most efficient solutions such as distance-based charging?

-single choice reply-(**optional**)

Yes

Comments

-open reply-(**optional**)

The risk is very high that this will increase the overall tax burden on commercial road transport which is unacceptable. Guarantees must be given that tax neutrality will be respected. There is also a risk of a negative impact on the European economy. There is a risk of more discrimination of road transport against other modes as similar measures are not yet in place or are not envisaged for other modes.

53. Should measures be taken to accelerate the deployment of electronic tolling systems allowing barrier-free tolling and avoiding toll booths?

-single choice reply-(**compulsory**)

Yes, urgently

Comments

-open reply-(optional)

But only on condition that it provides clear benefits for road transport operators in terms of cost reductions, reduction of the administrative burden and time savings. Increases in rates are not acceptable.

54. Should additional measures be taken to rapidly achieve a European Electronic Toll Service, allowing seamless use of all networks subject to electronic tolling?

Yes, urgently

-single choice reply-(compulsory)

Comments

-open reply-(optional)

55. Should measures be taken to ensure that tourists and other occasional road users are protected from discriminatory practices (such as disproportionately higher tolls or vignettes, difficult access to information and payment system) on charged roads when travelling abroad?

Yes, urgently

-single choice reply-(compulsory)

Comments

-open reply-(optional)

Part IV. Comments and Suggestions

56. Do you have any other suggestions concerning the upcoming possible initiative on road charging?

You may also email these suggestions to **MOVE-ROAD-CHARGING@ec.europa.eu**.

-open reply-(optional)