

The Secretary General

Brussels, 21 October 2011

Mr. Szabolcs SCHMIDT
Head of Unit D3: Road Transport
DG Mobility and Transport
European Commission
B-1049 Brussels

Subject: Review of the internal market in road freight transport – road user charging

Sir,

In response to the consultation paper on the review of the internal market in road freight transport, ASECAP – the European Association of Operators of Toll Road Infrastructures (www.asecap.com)¹ – would like to make its views known to the related High-Level Group set up by the European Commission, in particular on the questions pertaining to road user charging.

As regards the question raised under heading IV.2 on **distance-based user charges**, ASECAP and its members have consistently stressed that distance-based “pay as you drive” charging constitutes the cornerstone of any true “fair charging” scheme. Indeed, taxes and time-related charges relate to indicative – thus unfair – pricing schemes that ignore the actual use of infrastructure made during the daily, weekly, monthly or annual periods which they are paid for.

Moreover, as an instrument for sustainable, safe and green transport, direct “user-payer” tolling is a much more effective tool than tax or time-related charging schemes. With the *conditio sine qua non* to invest the tolling revenues into the road infrastructure itself, it guarantees the optimal financing of the construction, maintenance and operation of high-quality road infrastructures, providing an excellent service to the road users while respecting the environment.

¹ ASECAP is a European professional association registered in the Transparency Register of the European Commission (identification number 76903725494-68).

ASECAP is the sole pan-European organization that brings together operators of more than 44.000 km of motorways, bridges and tunnels, from 20 countries. The network of ASECAP's members thus constitutes a large part of the Trans-European Road Network. ASECAP's mission is to promote tolling as the most efficient tool to finance the construction, operation and maintenance of motorways and other major road infrastructures.



Under heading IV.2, the questionnaire also raises the issue of variable charging for **internal and external costs**. In this respect, ASECAP strongly supports a long-term infrastructure financing framework based on the “user-payer” and “polluter-payer” principles, provided that transparent and fair transport charges reflect the real infrastructure costs and, in addition, properly take into account and address the external costs caused by the actual use of the infrastructure in question. This implies that additional revenues generated by charging for congestion², air or noise pollution are used in the affected regions to combat congestion, compensate society, reduce pollution at source and develop additional or alternative capacities.

By doing so, correct price signals can be sent to infrastructure users, thus providing incentives to optimize the use of infrastructure, manage congestion and reduce local pollution. Otherwise, it would just make road transport more expensive, with detrimental effects on Europe's growth and competitiveness. Furthermore, it is essential to apply such a strategy to all transport modes, taking due account of each mode's own characteristics and specificities.

Regarding the issues raised under heading IV.1 on the multiplicity of road charging systems in the EU, ASECAP would like to reiterate its support for a pan-European **interoperability** of electronic toll collection systems. However, a number of important practical issues remain outstanding and hamper the actual deployment of the European Electronic Tolling Service in accordance with Commission Decision 2009/750/EC of 6 October 2009. In this respect, ASECAP and all the other stakeholders have recognized the need for stronger coordinated actions, where the ASECAP-EC Road Platform could play a role as it did in the past, bringing all the stakeholders together.

I am confident that the elements outlined above will contribute to the quality of the work of the High-Level Group for the Road Haulage Market.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kallistratos Dionelis', written in a cursive style.

Kallistratos DIONELIS
Secretary General

² However, it should be borne in mind that congestion costs form an integral part of direct infrastructure costs and are already borne by the users themselves, and that inappropriate congestion charging may perversely redirect traffic to lower quality and less safe roads.