

## **Call for feedback by the platform on sustainable finance on preliminary recommendation for technical screening criteria for the EU taxonomy**

This call for feedback is part of ongoing work by the Platform on sustainable finance, which was set up by the Commission to provide advice on the further development of the EU taxonomy. The purpose of this call for feedback by the Platform is to gather further evidence and feedback on the proposed draft recommendations for technical screening criteria.

ASECAP the association of toll road operators would like to take the opportunity of this consultation to make some comments and draw attention on the The Role of toll road operators in the could play in Taxonomy Regulation 2020/852.

Motorway networks form a fundamental element of the mobility chain, aiming at connecting, together with the transport networks, the territory. Toll road operators plays a key role for EU transport policy. Toll road operators are trying to limit as much as possible the impact of motorways on the human environment while preserving natural resources and also to reduce CO<sub>2</sub> emissions. This permanent commitment from companies is implemented throughout the successive phases which define the life of a motorway: its design, its construction, and its operation.

### **Considering the high priority underline to safeguard the environment**

The motorways of today already incorporate many features designed to protect the environment. ASECAP vision of the motorway of the future consists of a set of solutions to extend the reach of that approach and take it forward to minimize the environmental impacts of a motorway throughout its lifecycle:

- noise protection for the most exposed local residents;
- protection of water resources. To protect the quality of water resources, ASECAP members would like to contribute with the programme of upgrading our older motorways in the most vulnerable areas. The aim would be to direct rainwater runoff to catchment basins to clean to be reused for vegetation for instance,
- stimulate recycling for Infrastructure pavement repairs and worksites employing eco-materials and recycling,
- energy restraint and generation of renewable energy;
- make the infrastructure resilient

### **Considering the high priority underline to protect biodiversity and flora**

ASECAP members commitment to biodiversity starts at the motorway design stage for recent motorway, when comprehensive studies of existing biotopes and species are made:

- plan to preserve or relocate habitats is implemented.
- Improve old motorway to restore ecological continuity thanks to eco-bridges, eco-pipelines and facilities for animals
- Protect fauna species
- Use sustainable materials, which allow controlling water and noise pollution
- ...

Tolling/charging the routes is a proven way of creating incentives to promote climate-friendly mobility by staggering the toll rates according to the type of drive or pollutant class. This ensures that the costs are paid directly by the polluter, thus enabling significant control effects.

The Eurovignette sees road charging as a key instrument to tackle the reduction of the external costs of road transport and renewing the vehicle fleet towards cleaner vehicles. We expect the Eurovignette to play a major role in decarbonizing road transport. Road charging plays a key role 'internalising the external cost' of road transport and implementing the polluter pays principle enshrined in the TFEU, Article 191.

Yet, the technical screening criteria of the taxonomy regulation lacks the adequate criteria for toll road infrastructure activities. The EU transport policy sees road charging as an instrument to enable significant contributions to the reduction of environmental impacts generated by road traffic, thus the shortcoming within the regulation merits deeper debate.

**A technical screening criterium for road charging will:**

- 1) encourage investment in the development of such systems, particularly those that serve public purposes;**
- 2) ease the public procurement of such systems and the spread of application that serve public goals.**
- 3) on the revenue side, toll revenues, which provide clear incentives for low-emission mobility, should be assigned to the taxonomy.**

About ASECAP:

*ASECAP is the European Association of Operators of Toll Road Infrastructures across 20 member countries representing 135 companies employing more than 50.000 direct jobs and 200.000 indirect jobs. They operate, maintain, manage a network of more than 86.000 km with a long-term vision that ensures highest quality standards to make the road infrastructure safest, reducing carbon footprint and preserving the environment thank to the user/polluter/payer principle providing sustainable financing.*

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