



Bündnis LSVA für Europa e.V.

Rosenheimer Str.1, D-83115 Neubeuern am Inn
Büro Berlin: Griebenow-Str.22 – D-10435 Berlin
Büro Brüssel: Rue du Prince Royal 37, B-1050 Brussels
Tel: 0049-170-5389971,
email: info@lsva.eu, Internet: www.lsva.eu

10.4.2011

Dear Sir, dear Madam,

We are writing to you as an international association for fair transport prices, "Bündnis LSVA für Europa e.V. / Alliance for a HGV Charging in the whole of Europe". Our members are citizens, initiatives and NGO who are affected by negative effects from the lorry transport. We are following with great interest the TRAN's vote on the "Eurovignette III", on 12.4.2011.

With regard to Mr. El Khadraoui's report and the list of amendments, we feel that the TRAN committee should make the needs of the inhabitants of the EU its priority. External costs are citizens' costs. These are concrete and recurring (such as taxes, health insurance, expenses incurred by loss to the value of property, damage to health and accidents etc) External costs should therefore be given high consideration.

Our priorities:

Introduction of external-cost charges:

**Recital 6a new,
Recital 18a new,
Art. 7c-par.1-subpar.2a (new),**

**Please, reject am. 32
Please reject am 34
Please reject am. 47**

The concrete internalisation of external costs is of greatest importance. All additional bureaucratic obstacles should therefore be avoided. However, we are worried that the amendments mentioned could have converse effects and discourage member states to introduce external-cost charges.

Reduction for frequent users

Recital 25,

Please agree to am. 37 and 38

Those who cause more damages must be charged more. This would be only fair, and incentives for frequent users to modernise their vehicles would mean a very effective instrument. Reductions for frequent users as foreseen by the council would achieve opposite effects.

Noise costs

**Art.1-pt 2, Art. 7c, par. 1.,subpar.1,
Annex III**

**Please agree to am. 45 and 46
Please, agree to am. 99, 100, 101**

“Traffic noise alone is harming the health of almost every third person in the European Region. One in five Europeans is regularly exposed to sound levels at night that could significantly damage health.”¹ These are some of the latest WHO findings published a week ago. We feel that now the protection from traffic noise requires all instruments available. The scope for the noise cost charge must be clearly defined and noise cost charges must be allowed wherever this is necessary. The definition of the council’s proposal seems to be misleading and better should be dismissed.

It must also be guaranteed that noise costs may be levied for nights and days. The amendments mentioned (99, 100, 101) are helpful to clarify misleading words.

Tackle congestion, Variation of infrastructure charge

Article 1 – point 2, Art. 7 g – paragraph 4 Please, reject am. 70

Am. 70 suggesting the return of additional revenues to the users would cause great hindrances for the implementation of variations. It would also mean unfair regulations unless it was counter-balanced through additional claims from the users should longer congestions (= more costs) appear than estimated in advance.

Sensitive areas

The Alps are currently considered to be the most traffic-heavy mountain range in the world. This results in visibly higher costs than in other European regions. It is therefore of the utmost urgency to improve the corresponding regulations:

Mark-ups for sensitive areas

Art. 7f – par. 5

Please agree to am 57

(if no majority, agree to am 58 / 59 / 60)

The addition of mark-ups plus external-cost charges was already scheduled in the first parliament’s reading whereas the council proposed mark-ups be deducted from the external cost charge. We feel that it would be fairer to allow both charges to be added. It could better reflect the much higher costs for the population in the mountainous regions.

The method handbook shows the wide range of environmental, health effects, and external costs in the Alps. These costs are real costs for the society, the citizens must pay for them. It would only be fair to have a greater bandwidth of possible charges to give clear incentives for a reduction of the expensive problems.

Method Handbook:²

Basically different costs for sensitive areas arise from the following effects:

- Generally higher emissions (air pollutants and noise) due to:
 - Gradients (air pollutants and noise).
 - Higher altitudes (air pollutants).
- Higher concentrations of air pollutants due to:
 - Topographical and/or;
 - Meteorological conditions.
- Higher noise exposition due to temperature inversions and reflections.
- Slightly higher accident rates in alpine areas due to longer braking distances on descending roads.
- Different impacts of air pollution and noise exposure due to different population densities.

¹ www.euro.who.int

² Handbook on estimation of external costs in the transport sector, page 91

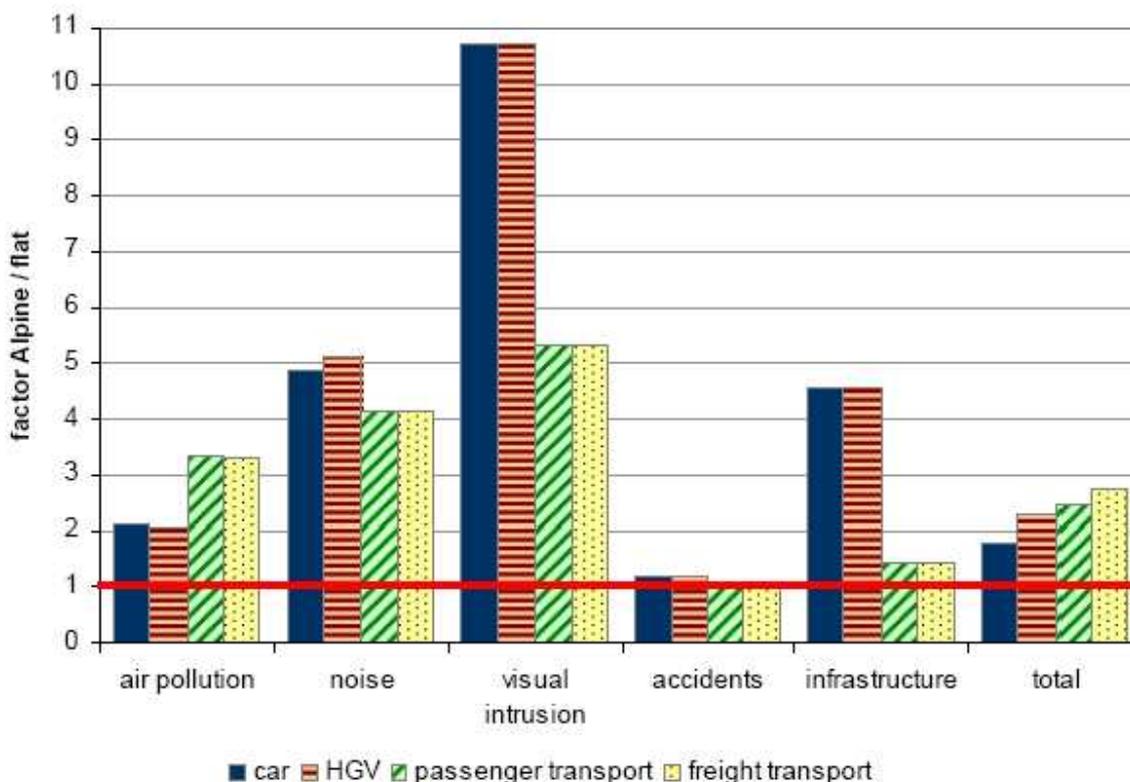
**Mountain multiplier for noise
Annex III b – point 2 – subpoint 2**

Please agree to am. 103

This regulation better reflects the real differences between the Alpine region and the lowland as is clearly shown in the commission's method handbook.³:

"Figure 10 summarizes all the results for the factors between Alpine and flat areas (reduced factors for total instead of local air pollution are used). (..) For noise and Infrastructure costs a factor of 5 is estimated. Effects of local air pollution are also in that magnitude. (..)"

Factors Alpine/flat for the different effects for road (car and HGV) and rail transport (passenger and freight transport)



May we ask you to consider including the focal points mentioned above in your vote on the EP's second reading, on 12.4.2011. Should you have any further questions, please do not hesitate to contact us.

Yours faithfully,

Heike Aghte, Secretary General

³ Handbook on estimation of external costs in the transport sector, p. 90, figure 10