

## Our Organisations



**Alliance of European Logistics**  
[www.logistics-alliance.eu](http://www.logistics-alliance.eu)



**Belgian Courier Association**  
[www.www.b-c-a.be](http://www.www.b-c-a.be)



**European Association for Forwarding, Transport, Logistics and Customs Services**  
[www.clecat.org](http://www.clecat.org)



**European Shippers' Council**  
[www.europeanshippers.com](http://www.europeanshippers.com)



**Eurocommerce**  
[www.eurocommerce.be](http://www.eurocommerce.be)



**European Express Association**  
[www.euroexpress.org](http://www.euroexpress.org)



**Febetra**  
[www.febetra.be](http://www.febetra.be)



**International Road Transport Union**  
[www.iru.org](http://www.iru.org)



**Transport en Logistiek Vlaanderen**  
[www.transportenlogistiekvlaanderen.be](http://www.transportenlogistiekvlaanderen.be)



**Transport en Logistiek Nederland**  
[www.tnl.nl](http://www.tnl.nl)



**European Road Haulers Association**  
[www.uetr.eu](http://www.uetr.eu)

## EUROVIGNETTE III QUALITY CHECKLIST

**WILL IT COMPLY WITH EU POLICIES, LAWS  
AND OBJECTIVES?**



## 1 | SMART REGULATION

YES  No

The legislation will be **inefficient** as it fails to:

- Understand road transport business models : it is based on the **incorrect assumption** that a simple increase in costs would influence road transport patterns, which are determined by customer demand
- Include **other road users**
- Secure binding **earmarking** of revenues for road transport projects
- Assess **other alternative measures** to reduce externalities (e.g. completion of the Single Market, Intelligent Transport Systems (ITS), fiscal incentives for greener vehicles)
- Examine **whether external costs are not already internalised** through other means in order to avoid double charging/taxation

## 2 | INTERNALISATION OF EXTERNAL COSTS

YES  No

The application of a charging system to internalise external costs means that **the revenues must be used to reduce the negative effects that cause these costs**. If not, these charges are nothing more than taxes and externalities will not be reduced. Member States may prefer not to take any measures to enhance road transport sustainability, and thus simply to generate extra revenues for the general budget.

The internalisation of external costs must be **for freight and passenger transport covering all modes**. However, there are protective clauses in the recast of the 1<sup>st</sup> railway package for noise charges for railways.

## 3 | REDUCING ROAD TRANSPORT ENVIRONMENTAL FOOTPRINT AT SOURCE

YES  No

Increases in infrastructure and external costs will have **an adverse effect on greening road transport** by limiting operators' ability to invest in methods and technologies that would reduce transport's environmental footprint at source.

## 4 | COMPLETION OF THE SINGLE MARKET

YES  No

The **implementation without delay of interoperable electronic systems for collecting charges** is a prerequisite in order to ensure the free flow of goods, the creation of new trade, and the avoidance of technical and administrative barriers within the Single Market.

Without electronic charging systems, variations according to time and place cannot be easily implemented. In such cases, only a flat rate can be applied, which makes the legislation superfluous, as it does not incentivise operators to adapt their behaviour.

## 5 | EUROPE 2020

YES  No

The legislation will lead to higher transport prices for road, rail and combined transport and their customers, especially SMEs and consumers that benefit from supply chain services. This would negatively impact the European economy without tangible improvements to road transport sustainability and without mitigating congestion.

## 6 | TRANSPARENT AND NON-DISCRIMINATORY LEGISLATION

YES  No

It is non-transparent to **include congestion costs as a toll variation** to infrastructure charges; strict rules are needed to ensure revenue neutrality of infrastructure charges on the same road section.

It is also discriminatory to exclude other road users and to penalise commercial road freight transport only, especially in peripheral countries.

## 7 | DIGITAL AGENDA

YES  No

**e-Commerce growth** will be hampered due to higher delivery costs for parcel shipments.