

# The charging of the use of road infrastructure



## Useful links

## Part I. About you

In what capacity are you completing this questionnaire?

\* (compulsory)

- As a citizen
- On behalf of a public authority
- On behalf of an industry association or a non-governmental organisation (NGO)
- On behalf of a company



Is your association/organisation registered in the Transparency Register of the European Commission [http://europa.eu/transparency-register/index\\_en.htm](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

\* (compulsory)

- Yes
- No



What is the name of the company, organisation or authority?

\* (compulsory)

Transform Scotland, Edinburgh

Please specify your main country of operations or residence.  
For international or European organisations, please choose "international".

\* (compulsory)

United Kingdom

Please specify which interests you (the organisation on behalf of which you respond) represent  
(multiple answers possible)

\* (compulsory)

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Road infrastructure operator | <input checked="" type="checkbox"/> Road freight transport | <input type="checkbox"/> Professional road passenger transport (i.e. coach, bus and taxi) |
| <input type="checkbox"/> Private car or motorbike use | <input checked="" type="checkbox"/> Rail transport         | <input checked="" type="checkbox"/> Intermodal transport                                  |

Other mode(s) of transport  
(please specify)

Pedestrian/public transport  
use

Non-transport related  
(please specify)

Comments

(optional)

## Part II. Problems

### Problem 1: Financing gap

#### Insufficient and inefficient maintenance of EU transport infrastructure

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.

The economic crisis and the Stability Pact have put 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.

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.

1. Please select the country which you know best.  
(can be your country of establishment or another country)

\* (compulsory)

2. How would you assess the state of maintenance of the transport infrastructure in your country and in the EU in general?

Please rate on a scale of 1 ("not appropriately maintained") to 5 ("very well maintained") or "don't know / no view"

	1	2	3	4	5	don't know / no view
transport infrastructure in your country (all modes) * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
road infrastructure in your country * (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
rail infrastructure in your country * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

transport infrastructure in the EU in general (all modes) * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
road infrastructure in the EU in general * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
rail infrastructure in the EU in general * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

## Comments

(optional)

In the UK road maintenance is variable depending on location but within cities road surfaces are often poor. In part this is due to ability of utilities to dig up roads to renew infrastructure then affect poor quality repairs that are then easily broken up. Motorways are better maintained, by necessity,

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?

\* (compulsory)

- Strongly agree
- Somewhat agree
- Somewhat disagree
- Strongly disagree
- Don't know / No opinion

## Comments

(optional)

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)?

\* (compulsory)

- Strongly agree
- Somewhat agree
- Somewhat disagree
- Strongly disagree
- Don't know / No opinion

## Comments

(optional)

It's been known for a long time that the transport sector doesn't cover its cost externalities (whether these are pollution, congestion, or social impacts). For example, our own research has found that each driver in Scotland costs the economy £172-£250 per year due to health and congestion impacts,

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,...) ?

\* (compulsory)

- Strongly agree
- Somewhat agree
- Somewhat disagree
- Strongly disagree
- Don't know / No opinion

Comments

(optional)

In as much as road users do not in general cover their external costs we would object to a general reduction in existing road charges and taxes. We do accept there may be a case for a reduction in existing road charges and taxes in certain circumstances. For example, in rural areas a car journey

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?

\* (compulsory)

- Concession motorways are always better maintained than other motorways
- Concession motorways are usually better maintained than other motorways
- There is no significant difference between how motorways operated by private concessionaires and other motorways are maintained
- Concession motorways are less well maintained than other motorways
- I don't know / No view

Comments

(optional)

No significant difference in UK context because little experience of tolling. The benefit of introducing a charging system to currently uncharged systems is that the money can be earmarked for other infrastructure improvements, not necessarily the actual road itself. So, for example, it could be used

## Problem 2: Fair and efficient use of road transport infrastructure

### **Congestion**

*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).

\* (compulsory)

- Yes, but only on the suburban network
- Yes, but only on the inter-urban network
- Yes, on the suburban and the inter-urban network
- No, congestion is a problem only within urban areas
- No, congestion is not a social and economic problem
- I don't know

Comments

(optional)

There are many examples from within the UK of chronic congestion both within major cities and in inter-urban motorways that make travel to work or goods delivery very badly delayed. Apart from that, congestion exacerbates air pollution and GHG emissions in addition to costs to the economy due

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?

\* (compulsory)

- Yes
- Yes, but the measure should be accompanied by adequate compensations for commuters and operators
- No, I am against charging for the use of congested infrastructure in peak hours, even if it would ease congestion problems
- I don't know

Comments

(optional)

Charges should apply at all times to reflect not only congestion but also environmental concerns such as GHG and air pollution. Charges should however be greater during peak hours to encourage a shift to off-peak where possible. Aim should be to improve public transport and affect a shift from car to

9. If there were significant charges for the use of inter-urban roads during peak hours on your holiday/leisure route, would you be inclined to adapt your travel choices by:  
(Several answers possible)

\* (compulsory)

- Travelling outside the morning and afternoon peak hours
- Choosing another mode of transport
- I wouldn't adapt my travel choices
- I never use my car for holiday/leisure
- I don't know

Comments

(optional)

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:

\* (compulsory)

- 5 eurocent/km or less (corresponds to 25 euro or less for the whole trip)
- 10 eurocent/km (corresponds to 50 euro for the whole trip)
- 20 eurocent/km (corresponds to 100 euro for the whole trip)
- 30 eurocent/km (corresponds to 150 euro for the whole trip)
- 40 eurocent/km (corresponds to 200 euro for the whole trip)
- Additional charges during peak hours would not make people change their use of the car for holiday travel
- I don't know

Comments

(optional)

Charge would need to be set at a significant level to cause modal shift. Also need to avoid transfer of traffic from tolled roads to non-tolled as this may divert traffic into rural areas and through villages and towns. Need to clearly identify what the charges are intended to achieve in terms of encouraging

11. Would you be inclined to adapt your commuting habits to avoid peak hour charging on urban and suburban roads?

\* (compulsory)

- Yes
- No
- I don't use my car to commute
- I don't know



11a. Then how would you adapt your commuting habits to avoid peak hour charging on urban and suburban roads?

(Multiple answers possible)

\* (compulsory) (at least 1 answers)

- I would consider using public transport
- I would consider using alternative means of transport (cycling, walking)
- I would consider car sharing
- I would consider working from home (i.e. teleworking)
- I would consider changing my commuting time
- I don't know (yet)

Comments

(optional)

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?

\* (compulsory)

- 10 cent/km or less (corresponds to 2 euro or less each weekday)
- 20 cent/km (corresponds to 4 euro each weekday)
- 40 cent/km (corresponds to 8 euro each weekday)
- 60 cent/km (corresponds to 12 euro each weekday)
- 80 cent/km (corresponds to 16 euro each weekday)
- Additional charges during peak hours would not make car users change their commuting habits
- I don't know

Comments

(optional)

This represents a significant additional expense for commuting and may well encourage a modal shift. It does however tend to have a more significant impact on the lower paid because the better off will not find the charge severe and may be able to claim back from employer. The income from urban

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?

\* (compulsory)

- 10 cent/km or less
- 20 cent/km
- 50 cent/km
- 1 euro/km or more
- I don't think that additional road charges would incentivise heavy goods vehicles not to use the roads during peak hours.
- I don't know

Comments

(optional)

Difficult to specify a charge across the whole EU because it would depend on local or regional circumstances but charge needs to be significant otherwise impact will be limited because clients may agree to absorb cost. Peak charge should be significantly higher than off-peak to be effective in

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)?

\* (compulsory)

- No shift
- Slight shift

- Medium shift
- Substantial shift
- Very substantial shift
- Don't know / No view

#### Comments

(optional)

In the short-term a shift to off-peak travel would be the likely result. To achieve a significant shift good alternatives at a better cost are needed and this requires that member states adopt a coherent planning process for the future because alternative modes take time to develop if not already

#### Environmental impacts

*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<sub>10</sub>, PM<sub>2.5</sub>), the breathing in of which has serious impacts on human health, carbon monoxide (CO) and nitrogen oxides (NO<sub>x</sub>). 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 ¾ 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 CO<sub>2</sub> 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)?

\* (compulsory)

- Yes
- No
- I don't know / No view



For what costs should vehicles then be charged?  
(Multiple answers possible)

\* (compulsory) (at least 1 answers)

- For air pollution
- For noise
- For climate change
- For other environmental costs (please specify)

#### Comments

(optional)



### Consistent price signals

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.

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.

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?

\* (compulsory)

- Not at all
- Slightly
- Significantly
- Very significantly
- Don't know / No view

### Comments

(optional)

In addition to differing road charging regimes currently in operation, differences in fuel duty between member countries can alter driver behaviour. Fuel prices can differ significantly between member states and represent a larger cost to road hauliers than vehicle duty and other charges.

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.

Do you agree that road charges on parallel routes must be coordinated - both within and between Member States - to avoid such traffic re-routing?

(optional)

- Strongly agree
- Somewhat agree
- Somewhat disagree
- Strongly disagree
- Don't know / No opinion

### Comments

(optional)

Although difficult to see how this could be managed given that alternative routes may be rural road network that goes through towns. One way would be a general road tolling system whereby car drivers were charged by miles on any road travelled although this would need significant technology

18. Do you agree that road charges should send stronger and more precisely targeted price signals to use cleaner vehicles?

\* (compulsory)

- Strongly agree
- Somewhat agree
- Somewhat disagree
- Strongly disagree
- Don't know / No opinion

Comments

(optional)

The need to decrease GHG emissions is imperative given the signals that we are observing as regards the severe impact of global warming on the global climate. Cleaner vehicles can contribute but reduction of cars/HGVs will give faster and more reliable benefits. German experience indicates that

### Problem 3: Patchwork of Road Charging Systems in Place

#### *Lack of technical harmonisation of road charging*

*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.*

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?

\* (compulsory)

- Negligible
- Low
- Average
- High
- Very high

Comments

(optional)

It would clearly make sense to harmonise the scale of charges levied through the EU and the system of metering so that expenses can be minimised and technical issues reduced.

20. Would you say that the lack of interoperability of electronic tolling systems is a particular problem?

\* (compulsory)

- Yes
- No

I don't know

Comments

(optional)

There are too many systems in operation, so there is a need to harmonise with single system of charging and metering or systems that can easily be adapted to other countries

21. Should toll booths be replaced by barrier-free electronic tolling?

\* (compulsory)

- Yes
- No
- It depends (specify the conditions)
- I don't know



Please specify the conditions

\* (compulsory)

Perhaps, as a transitional phase, some countries should be allowed the use of booths until users are familiar with the method of operation and electronic systems are in place. Electronic tolling would be the ideal but not sure of the technology is reliable enough at present. The aim should be to introduce a distance-based system throughout the EU that applies varying charges to roads depending on the scale of problem in the area due to congestion. Rural roads would be lightly taxed, enough to cover

Comments

(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?

\* (compulsory)

- Yes, for heavy goods vehicles, if it doesn't result in any increase in tolls
- Yes, for heavy goods vehicles, even if it does result in a small increase in tolls
- Yes, for all vehicles, including cars, if it doesn't result in any increase in tolls
- Yes, for all vehicles, even if it does result in a small increase in tolls
- No
- I don't know

Comments

(optional)

This would make sense from the point of view of fairness so that all EU members levy similar charges. Also, if all vehicles were tolled it would allow the possibility of developing a system to prevent vehicles transferring to minor roads because they could be set at higher or same rates. A distance

23. Do you think that toll operators should be obliged to offer European toll services?

\* (compulsory)

- Yes, for heavy goods vehicles
- Yes, for all vehicles, including cars
- No (please explain why)
- I don't know

Comments

(optional)

To encourage less travel by both commercial and private vehicles and a transfer to more sustainable modes such as rail.

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?

\* (compulsory)

- They will not decrease
- 20%
- 50%
- 70%
- 90% or more
- They will decrease, but I don't know by how much
- I don't know

Comments

(optional)

25. In your opinion, would greater technical harmonisation of road charging systems in Europe help reduce the operating costs of electronic tolling systems?

\* (compulsory)

- Not at all
- Slightly
- Substantially
- Very substantially

Comments

(optional)

Reduction in number of systems in use and need to allow for inter-operability must inevitably lead to decreased costs. However, there is the problem that too rigid a system may stifle innovation

## Problem 4: Transparency in levying charges and setting tariffs

*The 'Eurovignette' Directive put in place a mandatory common methodology for calculating the infrastructure 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?

\* (compulsory)

- I don't feel informed at all
- I feel somewhat informed
- I feel fully informed
- Don't know / No view

Comments

(optional)

Little experience in UK of road tolling

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?

\* (compulsory)

- Yes, the information should be provided in a more transparent manner
- Yes, the information should be provided in a more transparent manner and users should be consulted when toll levels are modified
- No
- I don't know

Comments

(optional)

Road users need to understand the rationale behind the tolls and the reasons for applying them otherwise they will be regarded as just another tax. They should be provided with a breakdown of the component parts of the charge as part of their invoice so that they become more aware of

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

(optional)

Users should be presented with the reality of traffic congestion and its cost to the economy. Also need to be made fully aware of environmental cost of GHG emissions in terms of weather trends and costs from storm damage. In short, need to be treated to factual information rather than sensationalised newspaper articles

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

\* (compulsory)

- Yes
- No

Comments

(optional)

## Part III. Possible ways of implementing road charges

### Earmarking

*In EU law road charges are payments in exchange for which motorists are given the right to use road infrastructure over a certain distance or for a certain period of time. It is often argued that the revenues from road charging should be reinvested in the transport sector and be used to increase its quality. This argument is gaining strength as public sources of funds are drying out and transport infrastructure is degrading.*

*On the other hand, when revenues from road charges are collected by the state, they could also usefully be dedicated to facilitate fiscal consolidation (i.e. reduce state budget deficits and debt) and reduce distortive taxes (e.g. labour taxes) to improve the competitiveness of the economy.*

30. In your opinion, how should the revenues from road charges be used? You may pick and rank up to 5 uses of revenues, where 1 indicates the best use, 2 the second best, etc.

You can not give the same rank to two different uses.

	1	2	3	4	5
Developing and/or maintaining national road infrastructure (optional)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable transport, including public transport and transport research (optional)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A European transport fund for developing and maintaining transport infrastructure of European importance (optional)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Reduction of transport taxes (e.g. vehicle taxes, fuel duties) (optional)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Reduction of labour taxes (optional)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Fiscal consolidation (optional)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify) (optional)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you chose "Other", then please specify.  
(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?

(optional)

- Yes
- No
- I don't know

Comments

(optional)

Should be obligation to maintain the road in a satisfactory condition but the bulk of revenue should be used to develop sustainable transport infrastructure. As an example of how revenues could be used one can look at the example of Sweden. In 2013, the city of Gothenburg will introduce a congestion charge

### ***Restructuring taxes and charges towards fuller application of the 'user pays' principle***

*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.*

31. In your view, which of the following would best lead to the fuller application of the 'user pays' principle?

\* (compulsory)

- Distance-based charges (tolls)
- Time-based charges (vignettes)
- Increased fuel duties
- Increased vehicle taxes
- It depends (specify)
- Don't know

Comments

(optional)

Distance based tolls would more accurately reflect the various costs imposed on society by excessive HGV or private car use. Those who use the roads most should pay the most. It would also serve to encourage the transfer of goods from road to rail for longer distances and have the same effect on

32. Would you support the introduction of new road charges if they were partly compensated by the general reduction of other taxes?

\* (compulsory)

- Yes
- No, the introduction of road charges should not be compensated
- No, I would not support the introduction of new road charges
- I don't know / No view

Comments

(optional)

33. Please indicate if you have any views on the proportion of new road charges that should be used to reduce other taxes

(optional)

#### Cost components of road charges

*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.*

34. Should road charges for heavy goods vehicles reflect the cost of wear and tear?

\* (compulsory)

- Always
- In most cases (specify the exceptions)
- Sometimes (specify in which case)
- Never
- I don't know



Please specify

\* (compulsory)

Smaller charges could be levied in rural areas where no alternative forms of transport, such as rail, are available so that essential goods are not priced unfairly. HGVs only cover a small part of the infrastructure and environmental costs at the moment. This means that the bulk of these costs are



Comments

(optional)

35. Should road charges for heavy goods vehicles reflect the cost of air pollution?

\* (compulsory)

- Always
- In most cases (specify the exceptions)
- Sometimes (specify in which case)
- Never
- I don't know



Please specify

\* (compulsory)

Air pollution is more of a health problem (excluding GHG from consideration) so an argument can be made for incorporating air pollution costs in areas adversely affected, which will be areas of most congestion and highest traffic volumes.

Comments

(optional)

36. Should road charges for heavy goods vehicles reflect the cost of noise pollution?

\* (compulsory)

- Always
- In most cases (specify the exceptions)
- Sometimes (specify in which case)
- Never
- I don't know



Please specify

\* (compulsory)

In areas where residents are adversely affected

Comments

(optional)

37. Should road charges for cars and other light vehicles reflect the cost of wear and tear?

\* (compulsory)

- Always
- In most cases (specify the exceptions)
- Sometimes (specify in which case)
- Never
- I don't know



Please specify

\* (compulsory)

Minor rural roads could be excluded initially because there may be no alternative and traffic volumes tend to be less and so wear and tear is less. These costs should however be recovered from urban road networks and motorways etc where wear and tear is high

Comments

(optional)

38. Should road charges for cars and other light vehicles reflect the cost of air pollution?

\* (compulsory)

- Always
- In most cases (specify the exceptions)
- Sometimes (specify in which case)
- Never
- I don't know



Please specify

\* (compulsory)

Air pollution is more of a health problem (excluding GHG from consideration) so an argument can be made for incorporating air pollution costs in areas adversely affected.

Comments

(optional)

39. Should road charges for cars and other light vehicles reflect the cost of noise pollution?

\* (compulsory)

- Always
- In most cases (specify the exceptions)
- Sometimes (specify in which case)
- Never
- I don't know



Please specify

\* (compulsory)

Where residents are adversely affected

Comments

(optional)

40. Should external costs other than air and noise pollution be internalised through road charges?

\* (compulsory)

- Congestion
- Climate change as long as there is no explicit climate change component in the fuel taxes
- Both congestion and climate change
- Other (please specify)
- All of the above
- No
- I don't know / No view

Comments

(optional)

41. Should road users pay for driving in peak hours?

\* (compulsory)

- Yes
- Yes, where congestion is significant in peak hours
- No

I don't know / No view

Comments

(optional)

42. If congestion charging were introduced, what form should it take?

\* (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)
- A charge that varies by time and that can lead to an increase in revenues, as much as necessary to discourage peak-hour traffic
- I do not support congestion charging
- I don't know / No view

Comments

(optional)

Road user charging should aim to address several issues relating to congestion, GHG emissions. In addition, it should be used as a source of revenue to improve public transport so that road users can have the option to use public transport if it does not currently exist in the area

43. Where road users have to pay for driving in peak hours, should the charge apply to all vehicles?

\* (compulsory)

- Yes
- Yes, except certain vehicles used for services of public interest
- No
- I don't know / No view

Comments

(optional)

Exemption should be given to emergency vehicles such as ambulance and fire service and public transport. The latter should only include buses and other vehicles used to carry commuters around the area and not to any bus, such as tourist buses.

44. Should construction costs be recovered through road charges?

\* (compulsory)

- Always
- Only a part if costs cannot be spread over a sufficient number of users
- Only if the road is (co-)financed in the framework of a Public Private Partnership (PPP)
- No
- I don't know / No view

Comments

(optional)

**Maximum toll values**

*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 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?

\* (compulsory)

- Yes
- No
- I don't know / No view

Comments

(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?

\* (compulsory)

- Adjusted to inflation only
- Updated to reflect the progress achieved in assessing the external costs of transport
- Adjusted to inflation and updated to reflect the progress achieved in assessing the external costs of transport
- Should be left unchanged
- I don't know / No view

Comments

(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.)?

\* (compulsory)

- Yes
- Yes, but ensuring that external costs charges do not discriminate against occasional (international) users
- No
- I don't know / No view

Comments

(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)?

\* (compulsory)

- Yes
- No
- I don't know / No view

Comments

(optional)

There is no reason why the occasional user should not pay the fully externalised costs to reflect the true cost of their journey but it should not be the yearly vignette.

### **Priorities at EU level**

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?

\* (compulsory)

- Yes, urgently
- Yes
- No
- Don't know / No opinion

Comments

(optional)

Many road networks are in poor state of repair and this should be addressed through the mechanism of road user charging so that polluter pays principle is applied uniformly.

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?

\* (compulsory)

- Yes, urgently
- Yes
- No
- Don't know / No opinion

Comments

(optional)

The current road infrastructure, both urban and inter-urban should be adequately maintained. However, over many decades in parts of Europe road infrastructure has taken priority to more sustainable modes and this needs to be addressed to reduce the massive increase in GHG emissions being experienced

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)?

\* (compulsory)

- Yes, urgently
- Yes
- No
- Don't know / No opinion

Please specify and comments

(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?

(optional)

- Yes, urgently
- Yes
- No
- Don't know / No opinion

Comments

(optional)

Time-based is not the most efficient way of reducing environmental impact and affecting modal shift. Need to harmonise on distance-based system.

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

\* (compulsory)

- Yes, urgently

- Yes
- No
- Don't know / No opinion

Comments  
(optional)

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

\* (compulsory)

- Yes, urgently
- Yes
- No
- Don't know / No opinion

Comments  
(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?

\* (compulsory)

- Yes, urgently
- Yes
- No
- Don't know / No opinion

Comments  
(optional)

Tourists should, in the early stages, be protected by, for example, paying charges on a weekly basis rather than annual charge irrespective of use. Eventually, tolling should be applied to all journeys for reasons given earlier.

## 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](mailto:MOVE-ROAD-CHARGING@ec.europa.eu).

(optional)



From the point of view of Transform Scotland, increased investment in sustainable transport infrastructure is necessary - but is not sufficient. Transport policy has no choice but to respond the challenge of climate change, for both environmental and economic reasons and transport prices must fully reflect environmental externalities We must also look at ways to reduce demand for road use. Pricing mechanisms have a role not only in reducing traffic and emissions, but they can also contribute

**SUBMIT**

[Clear existing answers](#)