

Transport and Tourism Committee,
European Parliament,
Rue Wiertz,
Brussels 1047

8th November 2005

THE SECRETARY GENERAL

Re: Proposal for the “charging of heavy goods vehicles for the use of certain infrastructures” and on “market access to port services”.

Dear Member,

November promises to be an important month for the Transport and Tourism Committee from a legislative point of view. The Committee will have its final vote on both the *Eurovignette* proposal (scheduled for 14th November in an extraordinary meeting) and the *Port Services* proposal (scheduled for the 22nd November).

Given the importance that industry attaches to both of these proposals I'd like to take this opportunity to remind you of our views on these significant issues and also to provide you once again with copies of our relevant positions papers.

Eurovignette

This Directive outlines the European framework for the charging of heavy goods vehicles for the use of certain infrastructures. From the very beginning the Commission proposals focused efforts on establishing a binding framework under which revenue raised as a result of the introduction of charges should be earmarked for the infrastructure network that is paid for.. This principle would have obliged Member States to use revenue raised as a result of these charges for Europe's transport infrastructure which in our view is the only fair and economically most advantageous way of making use of these revenues.

As you are also aware, these original provisions have been watered down. UNICE strongly believes that the compromise on the table is unacceptable and urges that you do not endorse any agreement which as a central plank discards the principle, that revenue raised as a result of these charges be reinvested in Europe's transport infrastructure.

Europe's Trans European Transport Networks are the arteries of the EU's internal market. Their continued maintenance and development have a direct impact on Europe's competitiveness. Ensuring that revenue raised as a result of the Commission's 'Eurovignette' proposal is re-invested in these transport networks is absolutely vital to a successful European economy – now more so than ever in the 25 Member States European Union.

As long as it is uncertain that the charges will be based on real costs, that double taxation will be prevented and revenue will be used for maintenance and improvement of the networks, UNICE would find it difficult to support both the *extension of this proposal to include all goods vehicles above 3.5 tonnes* and the *inclusion of external costs*.

Under existing conditions, enlarging the scope of this proposal to include vehicles over 3.5 tonnes will only have a negative impact on the competitiveness of companies that operate them (often on very small margins). As we have stated previously the continued existence of road taxes and fuel duties following the coming into force of this directive effectively results in a double taxation situation. Many companies have difficulty enough operating profitably without the added difficulty which the extension of these proposals will entail. I would therefore ask you to reconsider this extension.

Internalisation of external costs needs to be considered in light of how this can be accurately and correctly implemented. Until sufficient knowledge and technology is available that can ensure a fair, balanced and understandable way of doing this, care should be taken to ensure that costs for the transport sector do not randomly increase in a way that does not really resolve the problem. Therefore industry would ask for a pragmatic approach to this issue which accepts the reality that today the technology does not exist to accurately calculate external costs and until it does this issue cannot be properly resolved.

Market access to Port Services

Improved efficiency in the way ports are managed and run is essential to efficiently tackling the EU's ever growing transport needs (not the least of which is the need to encourage, by means of competition, modal shift of goods and passengers away from road to other modes of transport such as maritime).

The quality of Europe's ports depends not just on cranes, infrastructure and investment, but also on the service rendered, i.e. on the way exports and imports are dealt with. In this respect a modern business approach, more efficiency and free and open markets within ports are key requirements in making ports and maritime transport an attractive and competitive alternative in the European supply chain.

The opening up of market access to port services is a difficult issue and we would urge members not to reject these proposals out of hand. The proposals as they stand have benefited from the suggested amendments put forward by the rapporteur and others. We believe that the proposal would also benefit by having adequate transition times and realistic compensation coverage when existing service providers are obliged to compete for a concession to continue operations.

While the Commission's proposal is not perfect, it is nevertheless a step in the right direction, which is ensuring the provision of modern services that meet the requirements of those using ports. Without improvement in the services offered, ports will remain bottlenecks in the European supply chain and outside of the internal market for transport which is something that Europe cannot afford.

Therefore I would urge you to support this proposal and continue your efforts on this issue through the co-decision procedure rather than forcing it off the agenda altogether.

I thank you in advance for the attention which you give to these comments

Yours sincerely,



Philippe de Buck