



ROYAL NORWEGIAN MINISTRY
OF TRANSPORT AND COMMUNICATIONS

European Commission - DG Mobility and Transport
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Complementary remarks to the public consultation on the review of Directive 1999/62/EC (the Eurovignette Directive) as amended by directive 2006/38/EC and directive 2011/76/EU

We refer to the public consultation concerning the coming revision of the Eurovignette Directive as a part of the coming Road Initiatives. In this connection, Norway would like to make some complementary remarks to the questionnaire.

We agree that there is a need for better regulation in the field of road charging to insure an efficient and transparent system throughout Europe, thus acknowledging the principle rule of subsidiarity. Furthermore we agree that implementation of the EETS is an important tool to succeed in this and that different kinds of vignette systems should be faced out. We are also of the opinion that a distance based charging system is the most fair charging system.

However, we also have a few concerns when it comes to the coming revision. Our concerns are connected to possible compulsory earmarking of the road charging revenues, internalisation of external costs and an enlargement of the directive's scope. These concerns will be further discussed below.

Earmarking of the road charging revenues

Norway is of the opinion that each and every member state is the closest to know how the road charging revenues can be used in the most efficient way. We therefore believe that it should be within each member state's freedom of action to decide how the revenues shall be

used. In Norway revenues from tolls are strictly reserved for the specific road project and tolls are usually only collected after a new road project is opened. When the construction project has been paid off, normally within 15 years, but occasionally even earlier, the toll stations are removed. Maintenance is not a part of the Norwegian tolling scheme.

Furthermore, as stated earlier concerning the implementation of directive 2011/76/EU, Norway is of the opinion that compulsory earmarking of the revenues is related to taxation which is outside the scope of the EEA-agreement.

Internalisation of external costs

The aim of the Norwegian tolling system is financing construction of infrastructure – not regulating traffic, internalisation of external costs or creating revenues for maintenance of roads. Tolls paid are strictly reserved for the specific road project. Tolls are usually collected after a new project is opened. When the construction project has been paid off, normally within 15 years, but occasionally even earlier, the toll station is removed. Hence the Norwegian toll is not a user charge aimed at targeting all costs related to the use of the road, merely the construction of some parts of the road network. Each project that is financed by tolls has to be approved both by local authorities and by Parliament. We however do not preclude that in the future, the Norwegian tolling system might evolve in the direction of more permanent user charges also including operational and environmental costs.

Norway agrees with the Commission that the "user pays" principal is crucial: those who benefit from the new roads are supposed to pay for it and those who pay for the road should also receive the benefits. For this reason we also agree with the Commission that the fairest system is a distance based system.

We are also of the opinion that to use the "polluter pays" principal through a compulsory internalisation of external costs in road transport whilst other transport modes do not necessary have such a system, could be discriminatory and lead to a distortion of competition in the transport sector. The environmental consequences of traffic in Norway is handled through the general tax system under the responsibility of the Ministry of Finance; hence the environmental concerns are handled through the general tax system. A compulsory additional component in the toll to internalise external costs would therefore imply double taxation.

In the Norwegian tolling scheme all vehicles pay tolls including both lorries and cars. There is however one general exemption for fully electrified vehicles.

Enlargement of the scope

Norway agrees that all HGV over 3,5 tons should be within the scope of a new Eurovignette directive to insure a fair and efficient charging system for all transport of goods by road. However, the public consultation signals that maybe also private vehicles should be included in the Eurovignette schemes. This is seen as challenging for Norway because of our present discount system on tolls for road users. Toll charging in Norway is based on local initiative and acceptance and at present the discounts allowed for private cars are 20% which is higher than the Eurovignette directives limit of 13 %. The discount is an important contribution to

facilitate an increase in the use of on board charging equipment (OBE). The OBE is an important contributor in making toll collection more efficient and to reduce the administrative costs of the toll chargers. The discount is also non-discriminatory since it's not based on the nationality of the vehicle and can be obtained easily through the AutoPASS website which is available in both English and German.

In the existing Eurovignette Directives, urban areas are exempted from the provisions of the directive. We support that this is still the case also after the revision of the provisions concerning user charges in the transport sector. In the largest cities in Norway, central, regional and local governments have collaborated over several years in urban transport packages based on toll collection. Urban road and public transport infrastructure, as well as operation of public transport, are partly financed by toll collection. Indirectly, toll rings are also an important tool to curb private car traffic in the city centres. Rush hour fees have been implemented in some cities. It is therefore crucial that each city has within reasonable limits the freedom of action to introduce the adequate measures for the specific city and the usage of the revenues since one size does not fit all.

Final remarks

Norway is at the Commission's disposal if there should be any need for further explications of the present Norwegian position. We would also like to emphasize that we will submit further remarks once the Commission presents a draft proposal.

Yours sincerely,

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This document has been electronically signed.