



## COMMON POSITION OF AISCAT-ANITA-FAI ON THE EU GREENING TRANSPORT PACKAGE

The preservation of natural resources and the application, in addition to the principle of payment in proportion to the degree of use of the infrastructure, of the principle of payment in proportion to the environmental damage generated, are not only general and strategic guidelines that may be closely shared, but actually ones that have long since been applied on Italian toll infrastructure.

The application of such principles addresses criteria of social equity which we fully agree with, and is absolutely in line with the pursuit of co-modality/inter-modality and the effort to encourage alternative forms of transportation other than road. However, this must not necessarily penalise one form of transport for the benefit of others – something we express strong doubts on. As of today the relationship between road tariffs and the shift of freight traffic to other forms of transport has yet to be proven and, as reputable research has shown<sup>1</sup> it is very difficult to put together models that may be used to establish price/demand elasticity. Specific surveys show that a significant increase in toll tariffs, i.e. €1/km, would only yield a 1.22% increase in railway transportation for the roadways in question<sup>2</sup>.

We therefore believe we may summarise our position in a few key arguments as follows, particularly in consideration of the fact that the proposed provision:

- despite an insufficiently backed plan on the actions to be taken for other forms of transport, has an exclusive impact on road transport. This creates treatment disparity which results in market distortion with the aim of making road transportation less competitive. This means that in order to increase the market share – and not the efficiency – of other forms of transport, the most efficient form of transport is penalised;
- when addressing the cost of congestion, it only considers freight transport. In other words only 15% of all traffic is considered responsible for all congestion, instead of looking at the remaining 85% of traffic (private vehicles and buses). This seems somewhat inconsistent with one of the variables to be considered when charging congestion costs - differentiation of peak traffic and night traffic;
- it does not assess the part of external costs that are already internalised. We need only consider, for example, that motorway concessionaire companies make significant investments to limit traffic noise, where such investments are paid from toll collections;

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<sup>1</sup> Tariff systems for road freight transportation in EU member states and Switzerland commissioned by the European Parliament – Department B – to T& T – July 2008 presented to the European Parliament Committee for Transport in September 2008.

<sup>2</sup>The effect of motorway tolls on trucks for the road/rail breakdown of freight transportation – TransCare March 2006.

- it does not assess the extent to which taxes on road transportation may already cover the external costs generated by same. In Italy, for example, a study carried out by Prometeia in 2007 estimated tax collections for freight vehicles alone to be € 17.6 billion of which 9.6 for excise duties on diesel oil. Internalising monetary resources (including those of tolls and insurances) cumulatively amount to more than 20 billion euro<sup>3</sup>. A study carried out for the British market shows that two-thirds of the external costs of road transport are already internalised<sup>4</sup>;
- it does not consider the fact that in the case of Italy, especially for transalpine traffic, assuming the opening dates of the Turin/Lion and Brenner routes set by the European Coordinators to be valid, such lines will be available well after 2020. Until such a date, were implementation of the Proposed Directive under discussion be carried out along such routes, freight traffic would cost more in absolute terms with clear repercussions on consumer prices;
- As for the idea of introducing a generalised electronic collection of amounts, it must be underlined that both motorway operators as well as users have made significant investments in technology and know-how that today enable electronic collection of motorway tolls. Such investments must however be safeguarded, also for the purpose of protecting the role of absolute excellence that Italy plays in this scenario and to prevent the levying of further and unnecessary expenses of a technological or financial nature. As of today there are at least 5 different forms of electronic collection which, as said, involve significant installation and utilisation costs.

Lastly, it must be noted that the provision intends to make an impact on European networks that already offer high levels of quality and safety; if tolls were increased only on these networks, then traffic, especially traffic that is inflexible in terms of certain hours of the day, would be diverted onto lower quality secondary roads, and likely generate problems in terms of congestion and safety.

We remain available for any further requirement. Thank you for your consideration.

Sincerely,



<sup>3</sup> Economics, measurement and forecasts of the external costs of transportation in Italy. Prometeia/Aiscat - Il Mulino 2007.

<sup>4</sup> The Internalisation of the external costs of freight road transport in Great Britain – Piecyk and McKinnon – November 2007



*AISCAT – The Italian Association of Motorway and Tunnel Concessionaires – was created in 1966 and brings together all motorway and tunnel concessionaire companies operating in Italy. The Association is responsible for collecting, comparing and organising roundtables to share the experiences and needs of its member Associates, providing assistance and representing its members before the main political and administrative institutions.*

*Specifically, Aiscat:*

- *addresses technical, administrative, financial, legal and fiscal aspects of a general interest for its member Associates;*
- *represents the needs and proposals of the Italian motorway sector before the awarding Authority and before all other Authorities involved, whether institutional or not;*
- *promotes and protects the legitimate interests and needs of the sector before all competent offices, both at a national as well as international level;*
- *promotes the harmonisation and standardisation of the sector's procedures and activities, with particular reference to service operating practices and relations with users;*
- *promotes the development and modernisation of the infrastructural network and the improvement of conditions for sustainable mobility;*
- *carries out and promotes studies, research, conferences and meetings both at a national and international level on subjects and issues relating to the motorway sector.*

*For further information please visit [www.aiscat.it](http://www.aiscat.it)*



*Associazione Nazionale Imprese Trasporti Automobilistici*

*ANITA is the oldest Association of haulage operators in Italy. Established in 1944, it is a member of Confindustria and one of the organisations making up Federtrasporto – which pools together the main associations of transportation and logistics. It includes some 3 thousand companies, over 400 thousand workers and more than 46 thousand vehicles, 70 sections and territorial groups.*

*Specifically, ANITA:*

- *represents and looks after the interests of industrial haulage companies and works for their size, entrepreneurial, cultural and competitive growth;*
- *has its own representatives on the Consulta Generale dell'Autotrasporto e della Logistica (General Council of Road Haulage and Logistics), on the Central Committee, and on the Committees of the provincial Rolls of third party road haulage operators, as well as on all commissions having an interest in road transportation set up before the Ministry for Infrastructure and Transportation, the Ministry of the Interior and the Ministry of the Environment;*
- *carries out work to ensure that Italian transportation may secure conditions necessary to compete on a European level and positively influence European transportation policies;*
- *sustains the need to build a new unitary system among the Associations representing transportation interests in order to secure companies' future growth and development.*

*For further information please visit [www.anita.it](http://www.anita.it)*



***F.A.I. Federazione Autotrasportatori Italiani (Italian Federation of Road Haulage Operators)*** is the largest association in the road freight transportation sector in Italy, managed, set-up and sustained exclusively by road haulage operators.

Founded on 12 June 1963, ***F.A.I.*** today has more than 20,000 companies, over 70,000 vehicles, and more than 50 representative Territorial Associations.

Over more than 40 years of activity, ***F.A.I.*** has carried out and played an important union role, acting as spokesperson for the sector in addressing and resolving various problems connected with the sector's laws, national employment contracts and collective bargaining, training and work of entrepreneurs and their staff, company tax and accounting issues, operating costs and development of national and international transportation activities.

For further information please visit [www.fai.it](http://www.fai.it)