



# UNION EUROPÉENNE DES TRANSPORTEURS ROUTIERS

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European Commission  
Mr. Zoltán Kazatsay  
Deputy Director General for Energy  
& Transport  
Rue Demot, 24  
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Brussels, 27th of December 2007

Dear Sir,

Concerning : Internalization of external transport cost – Survey

We refer to the survey that has been made public by way of the link "ec.europa.eu/your voice".

This survey in our opinion is too restricted to cover the whole issue and doesn't allow us to ventilate our opinion in a correct manner.

As a transport federation we don't share by no means any fundamentalist points of view and we are certainly willing to talk about the different viewpoints.

In our view, the external cost of conveyance can be internalized, but we think it is important to bear in mind the following arguments:

1. As part of the internalization of the external cost we should duly considerate the impact of the price of it on the sale's and exportation price of the goods.  
We have to take care that the assumed measures don't slow down the European Economy.
2. Regarding this internalization, we have to fully reckon with the specificity of each transport mode.

We shouldn't forget that 85% of road transport takes place within a radius of 300 km.

We should try and avoid all too easy comparisons between the different transport modes, because each mode bears an other task:

- Ø Road transport serves the last parts of the consumption chain.  
One should develop a calculation tool that passes the simple calculation of the pollution per kilometer or per kilogram conveyed goods.
- Ø The comparison road transport – container vessel is not tenable.  
The first mode serves the end consumer and the other functions to cross over goods over the ocean.
- Ø The comparison road transport – rail transport has also to be analyzed carefully.  
One forgets too easy the cost that is needed to put the goods on the train and to



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bring the different wagons in a column.

In this comparison we talk only about the conveyed weight, but regarding the calculation of the external cost, we must think also about the conveyed capacity.  
The maintenance costs should always be observed in this context.

3. As to the matter of the accident costs and the liability insurance we like to draw your attention to the following important discrepancy in the legislation in the different Member States of the Union.

In the sphere of the civil liability cars, the Fifth European Directive stands on this moment only for a minimal harmonization of the existing rules concerning the civil liability cars.

The maximum compensation (at the expense of the insurers) differs substantially between the Member States.

As a consequence there are major differences in price concerning the insurance premiums that interfere just as much with the competition balance.

In some countries transporters underwrite in a compulsory way an insurance that covers damage that they can cause and this, without any limit on the amount that the insurer has to pay out if necessary.

It seems unacceptable to us that in that case of an accident, the insurance of the transporters from certain countries covers the damage only to a fixed sum, when the rest of the damage stays at the expense of the company (if it can do this...).

UETR asks that the proper European Authorities should build up a file to discuss the harmonization towards the maximum compensations of the Fifth Directive.

In the absence of this, these Member States should be enabled to demand the presentation of evidence of a civil Liability Insurance without limit or to demand the payment (at the border, at the Euro Vignette payment terminals) of an additional insurance coverage that will be calculated (likewise as the Euro Vignette) taking in account the time that will be passed in these Member States.

In conclusions, UETR would like to insist on the above points:

- Ø We should work more in a context of complementarity of the different modes rather than to emphasize competition.
- Ø We must see to the specificity of each mode.
- Ø The problem of the internalization of the external cost has to be put in the more global frame of mobility
- Ø By all means it is the European consumer and supplier who create the demand for transport.

We thank you for your attention to carefully listen to our arguments on these important issues.

Sincerely yours,

Michaël Reul  
Secretary-General



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