

● Directie

our reference HD/ALB/MP/svk/2014-080

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European Commissioner for Transport
Mrs. Violeta Bulc
European Commission
Rue de la Loi / Wetstraat 200
1049 Brussels
Belgium

re German toll

date 20 November 2014

Dear Commissioner,

The ANWB and FDM are touring clubs in the Netherlands and Denmark respectively who together represent the interests of more than 4 million consumer members in the area of mobility.

It is with great concern that we continue to follow the initiatives of the German minister of transport in an attempt to implement a toll for passenger cars on the existing network of German motorways. Despite of several adjustments to the original plan that were announced on 30. October, the plan still contains elements that are contrary to some of the most vital European principles and treaty provisions.

Request:

We would like to ask your directorate to carefully test and evaluate the following aspects:

1. The discriminatory character of the regulation to the extent that German motor vehicle drivers will be partially or fully compensated for the toll. Since foreign motorists already pay more in fuel taxes in Germany than the corresponding externalities, we can only see the proposed new tax as a general tax on foreigner entering Germany by car.
2. The lack of clarity with respect to how the system can promise to guarantee the privacy of road users. It is not clear if the driver or the registered holder of the number plate will be charged for the toll, what data will be stored and for how long and whether this data will be shared with other organizations. Considering the ambitions of the Committee for the implementation of a new European provision for data protection within the near future, we recommend the use of these protection provisions in your evaluation of the toll plan.
3. The lack of transparency relating to the costs of and the income from the new system. The prognoses about future income differ by hundreds of millions of euros from each other. With respect to the costs, no clear and complete overview has yet been given of such factors as the approximately 500 civil servants and the equipment needed to manage the new system, the extra safety measures required to prevent cut-through traffic on the underlying road network and the costs of new signposting and instructions explaining where and when passenger cars will have to pay a toll.

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Our polls show that the majority of people will restrict its journeys to Germany if toll is introduced. This shows that free movement across the borders will painfully decrease.

Finally, we would appreciate knowing in which phase of the German legislative trajectory the European Commission intends to test the plan.

If you have any further questions, please contact us.

Kind regards,

A handwritten signature in blue ink that reads 'F. van Bruggen'.

Frits van Bruggen
CEO & President ANWB

A handwritten signature in black ink that reads 'Thomas Møller Thomsen'.

Thomas Møller Thomsen
CEO FDM