

ITSBE26 CONGRESS

BETTER MOBILITY THROUGH INNOVATION

TOWARDS MOBILITY THAT WORKS.



MORA POSITION • SEPTEMBER 2026

Belgium's Road Vignette

A Critical Assessment and the Path Forward

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What is Being Proposed?

The vignette

- Time-based road charge from **1 May 2027**
- All **three Belgian regions** — joint cooperative framework
- Non-concessioned regional roads and motorways
- Passenger cars and light vehicles (MTM $\leq$ 3.5 ton)

Stated Goals

- Make **foreign vehicles** pay for infrastructure wear
- Generate revenue: approximately **€529 million per year**
- Compensate reduced annual vehicle tax (JVB reform)
- Framed as part of a **broader mobility tax reform**

Four Principles for Sound Pricing Policy

Established in MORA's 2024 position on road pricing — the benchmark for our assessment

1 • User-Pays

The charge reflects the costs the user causes: infrastructure wear, congestion, externalities.

Emphasis shifts from vehicle *ownership* to actual *usage*.

2 • Polluter-Pays

The charge reflects the vehicle's environmental impact: emissions, fuel type, Euro standard.

Differentiation must be meaningful — not cosmetic.

3 • Differentiation

Price varies by place, road type, time of day and distance.

Enables real demand management, congestion reduction and modal shift.

4 • Solidarity

The charge accounts for ability to pay, commuter needs and access to alternatives.

Compensatory measures for vulnerable groups must be built in.

What Users Will Pay

Euro Norm	1 day	10 days	1 month	2 months	1 year
Euro 0–3 (oldest)	€11.25	€15.00	€23.75	€37.50	€125
Euro 4–6 (current standard)	€9.00	€12.00	€19.00	€30.00	€100
Zero emission	€8.10	€10.80	€17.10	€27.00	€90

Key observation: The annual difference between a standard fossil car (€100) and a zero-emission vehicle (€90) is just **€10 per year** — a near-zero environmental incentive.

Too Little Differentiation

The vignette is a quasi-flat tax — it cannot steer mobility behaviour

No Demand Steering

No differentiation by **time of day**, **location** or **actual km driven**.
The vignette cannot reduce peak-hour congestion or shift traffic away from sensitive zones.

Weak Emission Classes

Only two fossil classes: Euro 0–3 and Euro 4–6. No split between **diesel and petrol**, no separate Euro 7 tier.

Broad groupings undermine environmental signalling.

Minimal ZEV Incentive

Zero-emission vehicles pay only **€10 less per year** than a standard Euro 4–6 fossil car.

Essentially no financial reason to choose electric over petrol.

Vehicle Mass Ignored

Road wear increases with vehicle weight to the 4th power.

The vignette completely ignores **vehicle mass** — a fundamental gap for an infrastructure charge.

Unequal Impact on Specific Groups

Several groups face disproportionate burdens — impact not properly studied

Persons with Disabilities

Exemption exists but must be **actively requested, i.e.** not automatic. Creates an administrative barrier for those who depend on car mobility most.

ZEV Vehicles 3.5–4.25 ton

Heavier zero-emission vans fall into a **regulatory gap** between the vignette (≤ 3.5 ton) and the truck kilometre charge. Unclear treatment in the proposal.

Taxis & Ride-Hailing

New recurring cost for commercial transport. Exemption inconsistently applied: private hire and taxis treated differently without clear rationale.

Oldtimers

Pay the same rate as regular vehicles despite very low annual mileage. A proportionality issue that the proposal overlooks entirely.

SMEs & Fleet Operators

No **bulk registration** facility for fleets. Risk for a significant administrative burden for businesses with large vehicle parks.

Cross-Border Workers

Impact on workers at cross-border economic zones was **not analysed** by the Flemish Government.

Implementation Uncertainties

Revenue projections and operational readiness carry significant question marks

Enforcement capacity

15 FTE

For all of Flanders as a major transit region. MORA considers this clearly insufficient to achieve meaningful compliance rates; Compliance determines actual revenue.

ICT costs (annual, recurring)

€14M

Already above initial estimates and rising. These operational costs reduce the net revenue available for infrastructure investment.

Revenue projection: €529M/yr

Fossil vehicles: €301M

Zero emission: €16M

Light freight: €62M

Foreign vehicles: €150M

Communication gaps

Multilingual outreach needed. Non-digital users require physical registration options. Cross-border road signage must be coordinated between regions.

A 10-Year Lock-In

The cooperation agreement severely limits Belgium's ability to correct course

Unanimity Required

Any change to tariffs, scope or structure requires agreement from all three Belgian regions. A single region can veto any reform — including improvements MORA recommends.

Duration: 10 Years

The samenwerkingsakkoord runs for a decade. Flemish mobility policy autonomy is substantially constrained until at least 2036 — well beyond the current government term.

No Arbitration Mechanism

The agreement contains no binding dispute resolution procedure. If regions disagree, there is no clear path forward — policy gridlock becomes the default outcome.

MORA's Concern

Locking in a structurally flawed instrument for 10 years risks making a suboptimal system permanent. Design defects identified today become harder to fix with every passing year.

One Positive Element

Revenue earmarked for infrastructure — the right direction, with important conditions

Revenue → Infrastructure

The proposed regulation earmarks vignette proceeds for road infrastructure investment. MORA supports this principle: those who use the road network should contribute to its maintenance and improvement.

The projected €529M/year, if realised, would represent a meaningful addition to infrastructure budgets across all three Belgian regions.

MORA's Condition

Revenue must be accompanied by genuine investment in enforcement capacity. Without sufficient controllers, the €529M projection is aspirational, not realistic.

Broader Mobility Policy

Infrastructure funding should be embedded in a coherent mobility policy. Public transport improvements, cycling infrastructure and modal shift incentives alongside road maintenance.

MORA'S VERDICT

Structural Design Flaws in a Suboptimal System

USER-PAYS

Annual flat rate regardless of actual usage. Low-mileage drivers subsidise high-mileage users. **No link to real road costs caused.**

POLLUTER-PAYS

Only two emission classes. €10/year difference between fossil and ZEV. No Euro 7, no diesel/petrol split. **No real environmental signal.**

DIFFERENTIATION

No time, location or distance differentiation. Cannot manage congestion, shift peak traffic or steer behaviour. **A blunt instrument by design.**

SOLIDARITY

Flat charge hits low-income commuters hardest. Vulnerable groups not automatically protected. **Cross-border impact not analysed.**

THE WAY FORWARD

Toward Distance-Based Charging

MORA's long-term vision: a general kilometerheffing that works for all road users

The Vision: Kilometerheffing

A general distance-based charge for all vehicles. Price varies by location, time of day, road type and vehicle characteristics. The only instrument that genuinely applies user-pays, polluter-pays, differentiation and solidarity simultaneously.

Revenue for broad mobility policy

Road pricing revenue must fund a broad mobility policy: not only road infrastructure, but also public transport, cycling and multimodal access, especially for those without alternatives.

Phased approach

Build trust and infrastructure step by step, not overnight.

Participatief

Broad societal dialogue before implementation, not after

Transparant

Clear revenue use, clear pricing logic.

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Thank you

Questions?

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