



Ten-year Strategy for the Haulage Sector First Consultation Document

Contents

Minister's Foreword	3
Consultation Process	4
Road Haulage	4
1. Ireland's haulage fleet.....	5
2. COVID-19 & Brexit.....	6
COVID-19	6
Questions	7
Brexit.....	8
Questions	9
3. Making Road Freight Transport Cleaner: Environmental Regulation, Sustainability and Decarbonisation	9
Questions	12
4. Making Road Freight Transport Safer: Road Safety Regulation	12
Questions	13
5. EU Road Transport Policy (Mobility Package)	13
Questions	15
6. Road Infrastructure and Usage Charging	15
National Road Network.....	16
Non-national Roads	16
Road Usage Charging	17
Intelligent Transport Systems.....	17
Questions	18
7. Labour Market and Skills.....	18
Questions	19
8. Integrated Transport Planning and Intermodal Transport.....	20
Integrated Transport Planning	20



Intermodal Transport.....	21
Rail	21
Air Freight.....	22
Ports and Airports.....	22
Questions	23
Industry Questions	24
Annex I: Haulage Sector Statistics Sources	26



Minister's Foreword

The road haulage sector plays a vitally important role in our economy. The COVID-19 pandemic demonstrated the resilience of our supply chains and much of the credit is due to our HGV drivers, who continued, and who continue, to transport goods within Ireland and abroad during this very difficult time.

In line with the Programme for Government, the Department of Transport is working towards developing a ten-year strategy for the road haulage sector. The first step in this work is the publication of this consultation document, which aims to provide a breakdown of the Irish haulage sector and its fleet, as well as outlining the challenges it faces as a result of the ongoing COVID-19 pandemic and Brexit.

The Government's aim is to develop a strategy that will focus on generating efficiencies and improving standards, while helping to create secure employment and assisting the sector in moving to a low-carbon future. We are seeking views on what measures are needed to deliver on these objectives, in particular decarbonising the haulage sector, which represents a significant challenge but which is required to make commercial road transport operations more efficient and sustainable.

While a number of questions are posed in this paper, I would urge participants to raise other issues which they believe may assist in developing the appropriate policy for this vital sector.

I hope that haulage operators and HGV drivers, as well as those working in the wider freight transport, logistics and supply chain sectors contribute to this public consultation and provide us with ideas and feedback for what will be the first strategy focused specifically on the haulage sector in Ireland.



Hildegard Naughton TD,

Minister of State with
responsibility for
International and Road
Transport and Logistics

Hildegard Naughton



Consultation Process

The Department of Transport is launching a two-phase public consultation to seek views towards the development of a strategy for the haulage sector in line with the Programme for Government commitment to publish and implement a 10-year strategy for the sector focused on improving efficiencies, standards, and helping the sector move to a low-carbon future.

As part of the first phase of this consultation, views or submissions are now being sought from all interested parties, including the road haulage sector and other industry stakeholders involved in the wider logistics and supply chain sectors, as well as from academia, further education, and the general public. Your views will contribute to the development of this strategy and we would particularly welcome submissions from those working in the road haulage industry, including representative bodies, individual haulage operators and Heavy Goods Vehicle (HGV) drivers.

A number of questions are posed in this paper; however, participants are not confined to answering these questions, which are aimed at assisting participants in compiling their contributions. Submissions may be published on the website of the Department of Transport.

To make a submission, please email responses to **haulagestrategy@transport.gov.ie** or send by post to *Road Transport Freight Policy Division, Department of Transport, Leeson Lane, Dublin, D02 TR60*.

This first-stage 12-week public consultation will conclude on 2 July 2021.

In light of the ongoing COVID-19 pandemic, it is envisaged that stakeholder meetings and events will take place online over the coming months.

Road Haulage

As an island nation, Ireland's domestic and international road haulage sector plays a vital role in our economy. The multimodal nature of our supply chains cannot be understated and the movement of almost all our goods relies on at least some element of road transport. The sector is a key employer.

While road transport is the dominant mode for the transport of goods within Ireland, with many goods transported in HGVs, decarbonising the sector has proved challenging. Technological advances have for the most part focused on electric passenger cars and light commercial vehicles. That said, a number of excellent examples of decarbonising and making the movement of goods more efficient are evident across the country. There has also been strong collaboration between Government and key industry stakeholders in recent years focused on how best to transition to alternative fuels and how to maximise efficiencies within the current HGV fleet, while acknowledging the challenges for the sector in the context of decarbonisation.

This strategy will concentrate on how Government, industry and others can best work together to improve efficiencies and standards, helping the road haulage sector to move to a low-carbon future over the short to medium term. This will help to ensure the safe and efficient movement of goods by



road, while minimising the impact on the environment, and ensuring that the sector continues to meet high standards of compliance with EU and domestic legislation.

This paper is a first step in this consultation process. We have sought to set out the current makeup of the haulage sector and its fleet in Ireland, taking into account the wider EU and international context. In addition, account is taken of wider external challenges facing the sector (such as COVID-19, Brexit and the wider skills shortage), as well as current initiatives aimed at decarbonising the HGV sector and making commercial road transport operations more efficient. The regulatory context is also set out, given that road safety, including the working hours of HGV drivers, is a key element in protecting the working conditions of drivers and all road users' safety.

1. Ireland's haulage fleet

At the end of December 2020, there were a total of 377,890 commercial goods vehicles taxed in Ireland. However, not all of these are HGVs. The number of commercial goods vehicles greater than 3.5 tonnes (*i.e.*, HGVs) taxed in Ireland was 39,922. As of March 2021, 20,219 of these are used for hire or reward. Almost all HGVs in Ireland are diesel-fuelled.

Those operating for hire or reward and transporting goods using a vehicle with a maximum permitted weight above 3.5 tonnes are legally required to hold a Road Transport Operator Licence, as well as an EU Community Licence to engage in the international carriage of goods by road for hire or reward within the Member States of the European Union. The licensed commercial road haulage fleet is therefore a subset of all of the commercial vehicles and HGVs on our roads. Some HGVs operate on an "own account" basis, for example when a company transports its own goods.

There are 3,791 road haulage operators operating for hire or reward currently established in Ireland, with 20,219 HGVs on these licences. Of these road haulage operators, 2,435 (64%) are licensed to operate internationally, while 1,356 (36%) operate nationally. Of the 20,219 licensed HGVs, 14,224 (70%) are licensed to operate internationally, while 5,995 (30%) are licensed to operate nationally.

The national HGV fleet is ageing with vehicles 10 years or older accounting for 45% of all vehicles¹. This presents both a challenge and an opportunity. Replacing vehicles at the end of their service with cleaner alternatives could have a significant impact on reducing freight emissions; however, if this transition does not occur there is a considerable risk of 'locking-in' a large cohort of HGVs to diesel for a number of years to come.

The majority of Ireland's licensed hauliers consist of small operators, often with a fleet of less than 5 HGVs. Those operating internationally have an average of almost 6 HGVs per operator, while national operators have an average of 4 vehicles each. However, it is important to note that over

¹ Low Emission Vehicle Taskforce Phase 2 Report (Department of Transport, Tourism and Sport and Department of Communications, Climate Action & Environment, 2019), <https://www.gov.ie/en/publication/564409-phase-2-low-emission-vehicle-taskforce-report/>



half (53%) of Ireland's hauliers operating domestically have only 1 HGV. The sector is competitive and operates to tight margins.

In 2019, hire or reward vehicles accounted for a larger proportion of road freight transport activity than own account vehicles. In terms of tonne-kilometres, hire or reward vehicles accounted for 72% of freight activity compared to 28% for own account vehicles².

Both own account and hire or reward vehicles carried out a much higher proportion of national journeys than international journeys, in terms of both tonne-kilometres and tonnes carried in 2019. For example, hire or reward freight activity in million tonne-kilometres comprised 75% national journeys and 25% international journeys³.

91% of the road freight activity originating in Ireland is destined for another location in Ireland. Of the remaining road freight activity originating in Ireland, 6% is destined for the UK while 3% is destined for other countries, such as Italy and France. Destinations in the UK account for 66% of international road freight transport activity originating in Ireland, while destinations in France and Italy account for 8% and 4%, respectively⁴.

94% of the road freight activity destined for Ireland originates from another location in Ireland. Of the remaining road freight activity destined for Ireland, 4% originates in the UK while the remaining 2% originates in other countries, such as France and the Netherlands. Origins in the UK account for 62% of international road freight transport activity destined for Ireland, while origins in Germany account for 9%, and origins in France and the Netherlands account for 8% each⁵.

2. COVID-19 & Brexit

Both COVID-19 and the UK's departure from the EU have presented significant challenges to the road haulage industry.

COVID-19

The COVID-19 pandemic brought to the fore the interconnectedness of our supply chains and the importance of international air and maritime connectivity for Ireland. While supply chains, for the most part, continue to function throughout the pandemic, the international road transport sector

² Based on an analysis of Irish registered goods vehicles with an unladen weight of 2 tonnes and over. Central Statistics Office (CSO) Road Freight Statistics - Annual Series - TFA02 - Road Freight Transport Activity (<https://data.cso.ie/table/TFA02>)

³ CSO Road Freight Statistics - Annual Series - TFA02 - Road Freight Transport Activity (<https://data.cso.ie/table/TFA02>)

⁴ CSO Road Freight Transport Survey Table 6: Transport activity classified by country of origin and country of destination, 2019. Road Freight Statistics - Annual Series - TFA21 - Road Freight Transport Activity (<https://data.cso.ie/table/TFA21>)

⁵ CSO Road Freight Transport Survey Table 6: Transport activity classified by country of origin and country of destination, 2019. Road Freight Statistics - Annual Series - TFA21 - Road Freight Transport Activity (<https://data.cso.ie/table/TFA21>)



has faced a marked reduction in demand for the transport of certain goods, given the temporary but widespread closure of many retail, commercial and other outlets across Europe and beyond.

Department of Health guidance was put in place for supply chain workers in March 2020⁶ in conjunction with the Department of Transport and transport stakeholders, and the COVID-19 incidence rate within the haulage sector both in Ireland and internationally has been low.

In addition to the overall fall in freight volumes, HGV drivers faced delays and COVID-19-related travel restrictions at borders across Europe. The Department continues to closely monitor the operation of international and maritime supply chains.

Ireland strongly supports the EU's efforts from the start of the pandemic to keep supply chains open and ensure minimal disruption of the EU's Single Market. The EU's 'Green Lanes' recommendations have served the EU Single Market well during the pandemic. Ireland has continued to exempt essential transport workers entering the country from testing and quarantine requirements and has urged other Member States to reciprocate, in the interests of the Single Market and keeping freight moving, particularly for the movement of essential goods such as food and medical supplies. In the main, essential transport workers, including HGV drivers, have been exempted from testing and quarantine requirements in Europe.

However, in response to increased COVID-19 numbers and new variants of the disease, there have been a number of testing requirements in some EU Member States. In December 2020, France required all HGV drivers arriving from the UK to have a negative COVID-19 test result, including drivers en route to France using the UK landbridge. This requirement was extended to drivers en route from Ireland on direct ferries at the end of January 2021.

To allow HGV drivers to meet new testing requirements around Europe, three dedicated HGV driver antigen testing centres were established, one near Dublin Port and two near Rosslare Port. The Department procured the services of an Irish healthcare company to provide these tests free of charge to HGV drivers.

Most testing requirements for HGV drivers en route from Ireland were lifted during March. However, the situation is evolving rapidly and some requirements are still in place for drivers travelling via the UK and some other parts of Europe. The demand for the testing service has fallen sharply. The service is still available but will be reviewed in light of these developments. Over 7,700 tests have been undertaken using the service with a positivity rate of around 0.2%. This low positivity rate reflects well on the measures that have been put in place by the industry and drivers to combat the spread of COVID-19.

Questions

- What lessons can be learnt from the COVID-19 pandemic, in terms of Ireland being better prepared for any future pandemic and to help the resilience of Ireland's supply chains?

⁶ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/72447/70cf404702d84030a3ff96c1a5750304.pdf#page=1>



- Are there any suggestions for policy support to address the challenges that have been experienced as a result of the COVID-19 pandemic?

Brexit

Proximity, our shared land border with Northern Ireland, the Common Travel Area and the close economic and social ties between Ireland and the UK make the UK the most important country for international haulage in and out of Ireland.

On this basis, from a road transport perspective, the Trade and Cooperation Agreement (TCA) reached between the EU and the UK in December 2020 is very welcome. The implementation of this Agreement into the future will be very important for Irish road haulage. While there are important differences for road transport between the TCA and the UK's previous membership of the EU, the Agreement allows for a close future relationship between the EU and the UK in road transport. This is very important in order to facilitate the ongoing close trading relationship between the EU and the UK, given the key role road transport plays in the trade in goods between the two.

Many of Ireland's key concerns in the area of international road haulage have been addressed in the TCA as summarised below:

- Unrestricted point to point transport of goods between both Parties (EU-UK).
- Full transit rights to and from Ireland through the territory of the UK.
- Limited cabotage provisions, meaning Irish and EU operators can undertake up to 2 cabotage operations within the UK (including Northern Ireland).
- For UK hauliers, these additional operations can be composed of two cross-trade operations (*i.e.*, transport operations between two Member States) or one cross-trade and one cabotage operation (*i.e.*, a transport operation within two points of a single Member State). Special provisions are made in the case of Ireland, as Northern Irish hauliers will be able to perform up to two cabotage operations in Ireland if their journey commenced in Northern Ireland.
- Detailed level playing field provisions to ensure that regulatory standards in both the EU and the UK remain broadly aligned. These regulatory standards cover areas such as road safety, social, environmental and technical regulations (drivers' hours, rest periods, certificates of professional competence, *etc.*).

The TCA sets up an EU/UK Specialised Committee on Road Transport to oversee the agreement. The Committee has the power to amend the road transport Annex to take account of regulatory and/or technological developments and decide on any other measures aimed at safeguarding the proper functioning of road transport aspects of the TCA.

Equally important for the road transport sector are the implications of the TCA for the flow of goods between the EU and the UK. The UK is now outside the EU's Single Market and Customs Union. This



means the movement of goods from, to and through the UK (excluding Northern Ireland) is now subject to a range of new customs formalities and other regulatory requirements on both the EU and the UK side. Some of these requirements are evolving and are being phased in. These changes are having a big impact on the haulage sector and its customers. Since 1 January 2021, there have been significant impacts on trade flows and trade routes, particularly for Roll-on Roll-off traffic in and out of Ireland. The landbridge route through the UK has, in particular, been impacted.

The Department has facilitated a weekly stakeholder meeting between haulier representatives and the regulatory authorities in the ports (customs, agriculture, and health) in 2021. These meetings have focused on the evolving customs, agriculture and health requirements as a result of Brexit. These meetings will continue as required. A range of business supports, including advisory, financial and upskilling supports continue to be available to businesses to help them adapt to Brexit.

Questions

- What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?
- How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?

3. Making Road Freight Transport Cleaner: Environmental Regulation, Sustainability and Decarbonisation

The UN's 2030 Agenda for Sustainable Development ("Transforming our World") includes 17 Sustainable Development Goals (SDGs) which reflect the economic, social and environmental dimensions of sustainable development. Transport has an important part to play in meeting these goals.

Manufacturers and retailers are increasingly demanding that their freight, transport, distribution and logistics providers transport their goods with a low CO₂ footprint, thereby encouraging logistics companies to invest in eco-friendly technologies, including the use of electric vehicles⁷.

Modelled future demand for freight suggests a near doubling (c. 91%) in current freight activity (tonne-kilometres) by 2050⁸. Over the next ten years, it is paramount that the road freight industry focuses on sustainable practices such as eco-driving, while making the switch to Electric Vehicles (EVs) where possible for distribution within cities, in conjunction with an increase in alternatively-fuelled HGVs and also a move towards renewable biogas injections into the CNG (Compressed Natural Gas) network for alternatively-fuelled vehicles.

⁷ <https://dbei.gov.ie/en/Publications/Publication-files/Focus-on-Transport-and-Logistics-2020.pdf>

⁸ Low Emission Vehicle Taskforce Phase 2 Report (Department of Transport, Tourism and Sport and Department of Communications, Climate Action & Environment, 2019), <https://www.gov.ie/en/publication/564409-phase-2-low-emission-vehicle-taskforce-report/>



It is recognised that the transition to alternatively-fuelled vehicles is a significant challenge for the road haulage sector. At the same time, the movement of goods by road remains the second biggest source of transport emissions after private car use. According to a recent emissions inventory, Heavy Duty Vehicles (HDVs) alone contributed over 19% of Ireland's total land transport emissions in 2019. Clearly, emissions from the freight sector are difficult to address as HDVs account for around 5% of vehicles on EU roads but are responsible for approximately 25% of all EU road transport emissions.

In Ireland, there is also a strong correlation between freight emissions and economic activity. This means that despite the presence of newer and more efficient vehicles on Irish roads, the resulting reductions in emissions and fuel use are being offset by increased freight activity. Projections indicate that without significant policy action, the emissions trajectory is set to continue to rise in the EU by a magnitude of 17% between 2010 and 2050. Analysis further suggests that this trajectory may be even steeper in Ireland.

At an EU level, the critical need to reduce emissions from transport has led to agreement on implementing increasingly stringent emissions standards for new HDVs, together with a broad policy shift away from supporting conventional diesel and petrol technologies. New HDVs must emit 15% less CO₂ by 2025, and 30% less by 2030 relative to average emissions over the period from July 2019 to June 2020. As part of the transition to EU climate neutrality by 2050, Green Deal policy objectives also include phasing out fossil fuels and transitioning transport to zero- or lower-emitting alternative vehicle technologies. These objectives will be supported in the short to medium term by the projected global rise in fossil fuel prices and by progressive increases to carbon taxes at EU Member State level.

Recognising the challenge that this shift from fossil fuels poses to the heavy duty transport sector in particular, the Climate Ambition actions of the European Green Deal include the objective of ramping up production and deployment of sustainable alternative transport fuels across Europe. This will have a beneficial impact on smaller transport markets including Ireland, which imports transport technologies from other states.

The European Commission Sustainable and Smart Mobility Strategy adopted in December 2020 outlines in more detail the transport policy aspects of the Green Deal. It includes an Action Plan of 82 initiatives that will guide EU transport policy over the next four years. The strategy identifies 10 flagship areas including Flagship 4 – Greening Freight Transport. The strategy lays the foundation for how the EU transport system can achieve its green and digital transformation and become more resilient to future crises. The result will be a 90% cut in emissions by 2050, delivered by a smart, competitive, safe, accessible and affordable transport system.

The Strategy stipulates that the further expansion of the Emission Trading System (ETS) could include emissions from road transport and work on an impact assessment for this proposal is ongoing. This proposed expansion of the ETS system would be undertaken as a complement to existing and future CO₂ emission performance standards for vehicles. In parallel, the European



Commission will be reviewing the State aid rules that set out how governments can provide financial support to particular sectors of national economies. The revised rules will include an increased focus on assisting the transport sector to transition away from fossil fuels. The indicative timeframe for the completion of these actions is June 2021.

At a national level the Climate Action and Low Carbon Development (Amendment) Bill 2021 was published on 23 March and will support Ireland's transition to Net Zero and achieve a climate neutral economy by no later than 2050. A new Interim Climate Action Plan 2021⁹ was also published in March 2021 which updates the actions in the 2019 Action Plan. Action 97 of the Interim Plan envisages the adoption of this *Ten-year Strategy for the Haulage Sector* by the end of this year. A 2021 Climate Action Plan is also currently being developed and a public consultation on this is underway and is open for submissions until 18 May.¹⁰

The transition to low-carbon fuel technologies is not expected to be uniform across the entirety of the Irish freight/haulage sector. It will include the use of Electric Vehicles (EVs) in the light commercial vehicle sector and a range of alternative fuel technologies in the heavy duty sector. To assist this process, the Government is currently supporting the uptake of EV technologies and the ongoing rollout of refuelling infrastructure for alternative fuels and technologies. Additional supports include:

- maintaining a low excise rate for natural gas and biogas for a period of eight years to facilitate the uptake of CNG and natural gas technologies and the acceleration of indigenous renewable biogas production; and
- an accelerated capital allowance scheme for gas-propelled vehicles and related equipment.

The work of the Irish road haulage industry towards reducing emissions from the existing diesel HDV fleet by promoting fuel, fleet and journey efficiencies is recognised. To support the work of industry in this area, the Department of Transport has commissioned a number of multi-stakeholder studies to identify concrete actions that haulage operators and companies can take to reduce carbon emissions from transport operations in the short to medium term. Among these are the Eco-HDV and MAP-HDV studies, and the Freight Decarbonisation Study which the Department has undertaken together with Transport Infrastructure Ireland (TII), with strong participation from key industry and academic stakeholders. Reports from these studies are expected to be published in 2021 and will feed into the ongoing development of policies and measures to assist the Irish haulage industry as it shifts away from the use of fossil fuels.

Building on the work and recommendations of the multi-stakeholder Low Emission Vehicle Taskforce, the Department has also put in place a number of supports to help the Irish haulage industry move towards alternative and low-emitting fuel technologies. These include:

⁹ <https://assets.gov.ie/127955/298d5c71-05d7-4ff9-b3f4-9da61bd17941.pdf>

¹⁰ <https://www.gov.ie/en/consultation/5bd95-climate-conversation-climate-action-plan-2021/>



- implementing a new reduced tolling incentive regime for alternatively-fuelled HDVs, which was rolled out in 2020; and
- a new Alternately-Fuelled Heavy-Duty Vehicle (AFHDV) purchase grant scheme launched in March 2021 to help haulage operators to bridge the differences in price between conventional and alternatively-fuelled technologies (administered by Transport Infrastructure Ireland (TII) on behalf of the Department)¹¹.

Questions

- What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?
- What is needed to incentivise less polluting Light Commercial Vehicles?
- Should eco-driver training be rolled out further, for example, as part of Driver CPC training?
- Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?
- How can we work to promote more efficiencies within the sector? Please refer to any best practice examples that you may have come across, whether in Ireland or abroad.

4. Making Road Freight Transport Safer: Road Safety Regulation

The current Road Safety Strategy 2013-2020 is being reviewed at present by the Road Safety Authority (RSA) with a view to a new 10-year strategy being in place in 2021. The existing strategy contains a detailed Action Plan. Many of these actions are generic to all road users and a number are directed specifically at road freight vehicles, particularly HGVs.

The RSA hosted an online road safety stakeholder seminar on 21 October 2020 and written submissions were sought from stakeholders by 22 November 2020. Details of the stakeholder consultation are available on the RSA website¹². Road haulage stakeholders have no doubt participated in this consultation and will have the opportunity to engage further as the new strategy is put in place. This new Road Safety Strategy will have a new road safety action plan for all road users including road haulage operators.

Since the Irish government's first Road Safety Strategy 1998-2002, the number of deaths on Irish roads has fallen from 458 in 1998 to 140 in 2019. In 1998, Ireland had 124 deaths per million of population. With 28 deaths per million in 2019, Ireland is one of the safest countries in Europe. The new Road Safety Strategy 2021-2030 will tie in with the next *EU Road Safety Policy Framework 2021–2030: Next steps towards 'Vision Zero'*. The Programme for Government also states that "We will introduce an ambitious road safety strategy targeting the Vision Zero principle".

The RSA is currently considering the responses to its consultation and intends to submit the Government's Road Safety Strategy 2021-2030 to the Minister for Transport later in 2021.

¹¹ <https://www.tii.ie/roads-tolling/tolling-information/afhdv-scheme/>

¹² <https://www.rsa.ie/en/RSA/Road-Safety/Our-Research/Road-Safety-Strategy-2021-2030/>



The RSA, the Health and Safety Authority and An Garda Síochána also cooperate closely as part of the Driving for Work initiative¹³. This is designed to help the employers of employees who drive as part of their work. The aim is to help employers to develop and implement safe driving practices. Employers, managers and supervisors must, by law, manage the risks that employees face and create when they drive for work.

It is important that the State authorities responsible for road safety work closely with the road hauliers, both licensed and own account, in order to improve road safety for all road users. This will also help the industry in terms of improving the public image and perception of road haulage. Good communications and education initiatives have an important role to play. The resources allocated to enforcement of road safety within the haulage sector are also important.

Questions

- What are the road safety priorities in road haulage for the next 10 years?
- How are these priorities best addressed?
- What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?
- What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?
- Do you have any other comments on road safety matters?

5. EU Road Transport Policy (Mobility Package)

The European Union's land transport policy aims to promote mobility that is efficient, safe, secure and environmentally friendly. In road transport the themes include a well-functioning internal market, fair competition and workers' rights, decarbonisation and digital technologies.

Elements of the EU Mobility Package, a major reform of the EU road transport sector, were published in the Official Journal of the European Union on 31 July 2020. The four new Regulations are part of a suite of new proposals first presented by the European Commission in June 2017.

These new EU Regulations aim to provide improvements for the EU road transport sector through better access to the EU road haulage market and enhancement of social legislation in road transport, improving drivers' working conditions. They also introduce special posting rules for drivers in international transport. Additionally, the new rules aim to make enforcement more efficient. The intention is that a balance between improved working and social conditions for drivers and the freedom to provide cross-border services for operators will be met, whilst contributing to road safety in a broader context.

The package consists of a regulation governing access to the road haulage market and to the profession of road haulage operator or road passenger transport operator; a regulation on

¹³ <http://drivingforwork.ie/>



maximum work and minimum rest times for drivers and positioning by means of tachographs; a directive revising enforcement requirements and laying down rules on posting of drivers; and a regulation relating to electronic freight transport information.

EU Mobility Package I

Title	First Implementation Date	Current Position
<u>Regulation relating to driving times and rest periods and tachographs</u>	20-Aug-20	Published in the OJ on 31 July 2020. Regulation 2020/1054 amends two existing EU Regulations (561/2006 and 165/2014). This Regulation has effect from 20 August 2020. However, point (15) of Article 1 and point (12) of Article 2 shall apply from 31 December 2024.
<u>Regulation relating to access to the profession and to the market</u>	21-Feb-22	Published in the OJ on 31 July 2020. It shall have effect from 21 February 2022.
<u>Directive relating to enforcement and posting drivers in the road transport sector</u>	02-Feb-22	Published in the OJ on 31 July 2020. By 2 February 2022, Member States shall adopt and publish the measures. They shall apply those measures from 2 February 2022.
<u>Regulation relating to electronic freight transport information</u>	21-Aug-21	Published in the OJ on 31 July 2020. It shall apply from 21 August 2024. However, Article 2(2), Article 5(4), Article 7, Article 8, Article 9(2) and Article 10(2) shall apply from the date of entry into force of this Regulation [first deadline 21 August 2021].

One of the new measures is the obligation of regular return of the vehicle to the Member State of establishment of the operator, which is established in the revised Regulation (EC) No 1071/2009 on access to the occupation of road transport operator, as agreed by the European Parliament and Council. This measure on the return of trucks to their Member State of establishment enters into force in 2022.

In February 2021, the European Commission published two studies it commissioned to assess the expected impacts of two specific aspects of Mobility Package I¹⁴. These two requirements – the compulsory return of the vehicle to the Member State of establishment every eight weeks and the application of cabotage quotas on international combined transport operations – were introduced

¹⁴ [Mobility Package I: European Commission publishes study results | Mobility and Transport \(europa.eu\)](#)



by the European Parliament and the Council, and were not part of the Commission's proposals. The Commission will now assess the study findings in the context of the European Green Deal, Sustainable and Smart Mobility Strategy and the functioning of the Single Market. The Commission's intention is to open a discussion with Member States, the European Parliament and all concerned parties on the possible ways forward, based on the data and findings of the two studies. The Commission aims to have an open dialogue to assess potential next steps in light of the need to pursue the Green Deal objectives, the proper functioning of the Single Market, and the need to secure high social standards and the wellbeing of drivers.

Notably, light commercial vehicles (LCVs) will come within the scope of the relevant EU Regulations over the coming years. The rules will be extended to cover LCVs of over 2.5 tonnes used in international transport, with a transition period of 21 months for market supervision and until the middle of 2026 for tachograph and rest time rules.

Questions

- What are your views on how Ireland implements the Mobility Package changes?
- What are your views on the return of the truck?

6. Road Infrastructure and Usage Charging

A review of the National Development Plan (NDP) is currently underway to take account of the COVID-19 crisis and Brexit, and to strengthen alignment with the National Planning Framework, the Climate Action Plan, and the range of other sectoral policies. The intention is that a revised NDP will outline transformative change in our transport system to deliver on the ambition of the National Planning Framework and, alongside it, the Programme for Government. The scale and focus of future NDP investment will be informed and underpinned by sectoral strategy for land transport and the National Investment Framework for Transport in Ireland.

The National Investment Framework for Transport in Ireland (NIFTI) is the Department of Transport's framework for prioritising future investment in the land transport network to support the delivery of the National Planning Framework, the realisation of its spatial objectives and the 10 National Strategic Outcomes. This investment will contribute to Ireland's decarbonisation efforts, support vibrant and successful communities, deliver a high-performing transport system, and promote a strong and balanced economy. Infrastructure that meets our transport needs in the most sustainable manner and which focuses on first maintaining and optimising existing assets, before seeking to improve/expand them or to build new is a key principle of NIFTI.

NIFTI sets out, for the transport sector, what we will prioritise for investment and how we will do so. Four key priorities for investment have been identified as the means by which to address and overcome our identified transport challenges and ensure that transport investment enables and facilitates the National Planning Framework and the ambition of our national strategic outcomes in the coming years and decades. These four priorities are decarbonisation; protection and renewal;



urban mobility of people and goods; and rural and regional connectivity. These NIFTI investment priorities identify the types of transport interventions that will be given precedence under the framework and are supported by modal and intervention hierarchies to ensure that the most appropriate solution to a given problem or opportunity is deployed.

Future investment will need to deliver a safe and sustainable land transport network that supports prosperity, promotes balanced development and helps to realise our climate change goals.

Transport connects people and places. It facilitates opportunities and helps to create prosperous communities, from city centres to rural areas.

National Road Network

In relation to national roads, the Programme for Government commits to maintenance of the existing road network. The Programme for Government supports the NDP commitment to invest in new roads infrastructure to ensure that all parts of Ireland are connected to each other.

In Ireland, the national roads network is c. 5,300 km in length, of which almost 1,000 km are motorways, from a total road network of approximately 100,000 km (the remaining being regional and local roads). Brexit has also reinforced the importance of the EU TEN-T networks for transport, given the reliance on road freight for imports and exports.

In the period 2018-2021, significant investment took place in new inter-urban roads, strengthening the connection between regions and urban centres. Under the current National Development Plan 2018-2027, which is being reviewed at present, the objective is to complete these linkages so that all the major urban areas are linked to Dublin by a high-quality road network. The other major objective is to make substantial progress in linking our regions and urban areas not just to Dublin but to each other, enhancing regional accessibility.

It is intended that a significant percentage of national roads capital expenditure over the course of the revised NDP will be on capital maintenance works, in order to maintain and ensure the resilience of existing national road assets. It is an investment priority to ensure that the existing extensive networks which have been greatly enhanced over the past two decades are maintained to a high level to ensure quality levels of service, accessibility, and connectivity to transport users. Some of these assets will also be improved/retrofitted, for example to provide for greater public transport provision (e.g., bus lanes), the adoption of Intelligent Transport Systems and other traffic enhancement measures. Investment will continue over the lifetime of the NDP to ensure the existing transport network is maintained to a robust and safe standard and also on new projects to contribute to compact growth and enhance regional accessibility.

Non-national Roads

Regional and Local Roads carry approximately 55% of national traffic. However, they are disproportionately long relative to the traffic that they carry. Given the dispersed settlement pattern of rural Ireland and the average density of 27 people/km², scope for modal shift away from non-national roads is low. Damage can be caused by excessive rainfall, fluctuating temperatures, erosion



of embankments due to tidal and river flow and severe weather. In many instances the damage is severe, resulting in the infrastructure becoming impassable until it can be repaired and re-opened. Many of these roads are strategic 'lifeline' roads with little or no alternative route. The frequency with which these roads and bridges are impacted is increasing and the remediation reactive and temporary resulting in poor value for money.

In this context, NIFTI highlights the importance of network reliability and the risk and likelihood of disruptive road failures. For example, the identification of key 'lifeline' roads, which, if they fail would seriously disrupt access to users of those roads. In common with National Roads, a key priority will be to move towards zero emission vehicle usage.

Consistent with the Programme for Government commitments and NIFTI, the primary focus of the investment programme in regional and local roads will continue to be on the protection and renewal of the regional and local road network. This includes necessary investment in targeted interventions to address safety hazards, socio-economic activities and climate adaptation/resilience. These measures are needed to optimise the network, address climate challenges in a systematic way, and protect road users and 'lifeline' routes that connect communities to critical services. In addition, targeted investment is required on certain roads to cater for socio-economic activities and the existing NDP makes provision for a programme of road improvement schemes. Five of the proposed 12 larger schemes mentioned in the NDP will be completed by mid-2021 with a sixth scheme under construction.

In line with core principles in Regional Spatial and Economic Strategies, multimodal integration between roads and urban settlements in smaller towns and villages will be encouraged in local authority and town council plans.

Road Usage Charging

Building on the work and recommendations of the multi-stakeholder Low Emission Vehicle Taskforce, a new reduced tolling incentive regime for alternatively-fuelled HGVs was rolled out in 2020.

Where there are such charges, EU legislation sets rules for charging heavy duty vehicles for the use of certain infrastructures. The EU is working on a revision of the 'Eurovignette' Directive. According to this proposal, Member States should calculate road charges on the basis of a vehicle's CO₂ emissions, thus incentivising the use of cleaner vehicles.

Intelligent Transport Systems

The EU's Green Deal highlights the role technology will play in achieving its transport objectives, particularly through increased digitalisation and use of data in the transport sector. The road haulage sector has been quick to recognise the benefits of technologies such as real-time travel information, satellite navigation etc.

Such technology also paves the way for new developments such as Connected, Co-operative and Automated/Autonomous mobility (CCAM). Connected and co-operative vehicles use digital



connectivity to talk to each other (known as V2V or vehicle to vehicle) and to their environment (V2I or vehicle to infrastructure).

An Irish pilot project in relation to co-operative intelligent transport systems (C-ITS) is currently being prepared. The pilot will include development of services to align with Irish priorities, whilst recognising relevant standards and regulation. The pilot will test and evaluate C-ITS services on the Irish Roads Network, and will consider how the CCAM model supports C-ITS and wider CCAM considerations.

Questions

- Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?
- What more is needed in relation to road user charging for freight transport in Ireland?

7. Labour Market and Skills

A number of Government departments are involved in the ongoing assessment of Ireland's labour market and skills shortages, including the Department of Enterprise, Trade and Employment (DETE) and the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS). The Expert Group on Future Skills Needs (EGFSN; DETE) advises the Irish Government on current and future skills needs of the economy and on other labour market issues that impact on Ireland's enterprise and employment growth. A network of Regional Skills Fora (RSF; DFHERIS), created as part of the Government's National Skills Strategy, provides an opportunity for employers and the education and training system to work together to meet the emerging skills needs of their regions. The RSF provide contact points in each region of the country to help employers connect with the range of services and supports available across the education and training system.

The [National Skills Bulletin 2020](#) was published in October 2020. For truck and van drivers, employment growth was above the national average over the five-year period from 2014 to 2019. The study found that, with 27% aged 55 years and older, replacement demand alone will present a number of job openings in the short-term. Additionally, new employment permits issued for HGV drivers indicate that in 2019 employers were having difficulty in sourcing suitable candidates from the Irish labour supply. The outlook for these occupations varies, with additional skills requirements expected in the areas of customs and digitalisation. Demand for domestic truck and van drivers most likely increased due to surges in online shopping associated with COVID-19 restrictions.

In 2018, the EGFSN forecast a potential demand for c. 3,000 new entrants each year to freight transport, distribution, and logistics roles over the years 2016 to 2025. The EGFSN's 2018 report highlighted critical skills gaps in key areas of the Freight Transport, Distribution and Logistics (FTDL) sectors, with particular emphasis on the HGV driver shortage.

One of the key recommendations contained in both the EGFSN's 2015 report, "Addressing the Demand for Skills in the Freight Transport, Distribution and Logistics Sector in Ireland 2015-2020",



and 2018 report, “Addressing the Skills Needs Arising from the Potential Trade Implications of Brexit”, was the establishment of a Logistics and Supply Chain Skills Group (LSCSG), to manage a coordinated response from the Logistics/Supply Chain sectors to promote the sectors and their skills needs.

Chaired by the Department of Transport, the LSCSG was established in 2019 with key stakeholder representatives from industry, education, and government, and provides a forum for practical action and collaboration to address the skills needs of the sector. Six meetings have been held since October 2019 to date.

An annual progress report¹⁵ outlining the progress of the LSCSG in its first year was published in February 2021. Despite a number of challenges during the Group’s first year, including Brexit and the impacts of the COVID-19 pandemic, the LSCSG has advanced its Work Programme through the establishment of subgroups to focus on specific objectives.

Another four meetings of the group are planned for its second year. The work of the Group continues to focus on enhancing the perception of the sector’s roles, entry routes and development opportunities, attracting and retaining talent, and enhancing the sector’s ability to service the demand for skills over the coming years.

The shortage of HGV drivers remains a critical issue here in Ireland and across Europe. The EU-wide shortage in HGV drivers means that it is difficult for Irish companies to recruit drivers from other EU Member States. The European Commission has recognised that the road haulage sector is affected by the ongoing shortage of drivers. The industry is contending with an ageing labour force in which the average age of a professional driver in Europe stands at around 50 years old, and difficulty in attracting young talent is one of several key factors causing the shortage of professional drivers in the transport sector (IRU, 2019). Efforts continue in Ireland (driven by the Freight Transport Association Ireland (FTAI) and Irish Road Haulage Association (IRHA) and other key stakeholders) to establish traineeships and apprenticeships to mitigate the HGV driver shortage. In 2020, Ireland also increased its quota for employment permits for non-EEA HGV drivers to assist in providing at least some solutions for road transport operators. However, more must be done to encourage new entrants into the sector.

Questions

- How can more people be encouraged to take up work in the road haulage sector, *e.g.*, as HGV drivers, Transport Managers, customs roles, *etc.*? Please provide concrete suggestions/best practice examples.
- How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?
- How can the ability of the haulage sector to attract and retain talent be strengthened to service the demand for skills over the coming years?

¹⁵ <https://www.gov.ie/en/publication/cbbc9-logistics-and-supply-chain-skills-group/#:~:text=The%20Logistics%20and%20Supply%20Chain,Supply%20Chain%20sectors%20in%20Ireland.>



8. Integrated Transport Planning and Intermodal Transport

Integrated Transport Planning

As detailed above, a revised NDP will outline transformative change in our transport system to help deliver on the ambition of the National Planning Framework and the Programme for Government. Planning for the infrastructure needs of the haulage sector falls into the integrated transport planning hierarchy, in the same way as planning for passenger transport. Land use planning also plays an important part in supporting the sustainable transport of goods as outlined in Section 3 above.

Within the Greater Dublin Area (GDA), the National Transport Authority (NTA) has a statutory role in relation to planning under the Planning and Development Act 2000 (as amended), to ensure that new Local Area Plans and County Development Plans are in line with the overall NTA Transport Strategy. The NTA also has a statutory planning role, nationally, in relation to the development of Regional Spatial and Economic Strategies, which must demonstrate consistency with the policies of the NTA in relation to the effective integration of transport and land use planning.

The Transport Strategy for the Greater Dublin Area, 2016-2035 has been prepared and published by the NTA in accordance with Section 12 of the Dublin Transport Authority Act, 2008. It sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow and Kildare, over the period of the strategy.

Section 5.8.4 of the Strategy deals with Freight Movement within the GDA. The list of possible actions is a useful overview of policy interventions for freight both at a regional and national level.

- Implement demand management measures on the M50 motorway to ensure that it retains sufficient capacity to fulfil its strategic functions, including freight movement;
- Implement, when appropriate, demand management measures on the radial national routes approaching the M50 motorway (M1, M2/N2, N3/M3, N/M4, N/M7, M11) to ensure that these routes retain sufficient capacity to fulfil their strategic functions, including freight movement;
- Ensure that the Dublin Port Tunnel continues to perform its primary function of providing access to Dublin Port for freight traffic;
- Provide for the continuation of the current Dublin City Heavy Goods Vehicle (HGV) Management Strategy and for its further expansion to other vehicle types, potentially with an expanded exclusion area;
- Assess the potential for, and, if appropriate, introduce, similar HGV management measures in other town centres in the GDA;
- Provide goods vehicle parking facilities at on-line motorway service areas and other appropriate locations within the GDA in accordance with relevant planning guidelines and official policy;



- Require the clear identification in development plans of appropriate locations for freight intensive developments, and the implementation of Distribution and Servicing Plans for such developments as part of the planning process;
- Introduce specific delivery arrangements in large urban centres, including Dublin City Centre, which targets deliveries outside of peak commuting hours and, preferably, outside of daytime business hours; and
- Introduce low impact delivery schemes in Dublin City Centre and other town centres, by using smaller, quieter and/or lower emissions vehicles, including electric vehicles.

The NTA launched a review of the Greater Dublin Area Transport Strategy in November 2020 and submissions were sought by January 2021¹⁶. The NTA's intention is that a draft Strategy Review will be published in summer 2021.

The Cork Metropolitan Area Transport Strategy 2040 was published in February 2020, after a consultation process¹⁷. Section 14 deals with Freight, Delivery and Servicing and includes a list of actions in relation to freight transport and the decarbonisation of freight.

A draft Limerick Shannon Metropolitan Area Draft Transport Strategy 2040 was published in June 2020 seeking submissions by October 2020. Section 12 deals with Freight, Delivery and Servicing and contains a list of proposed actions including Regional and Local Freight Strategies primarily to address decarbonisation¹⁸.

Galway County Council & Galway City Council, in partnership with the National Transport Authority, have also developed the Galway Transport Strategy (GTS).

Intermodal Transport

Much of the road freight transport carried out within Ireland depends upon intermodal freight transport connectivity with the maritime, aviation and rail sectors.

Rail

While the total freight market size has increased in recent years, the rail volume has remained relatively constant. Rail freight is a minor player in the overall current freight market in Ireland; however, it is in a good position to compete with the large volume and the bulk movement of goods and a growing market where companies are seeking more environmentally efficient ways of managing their supply chain.

In relation to interurban rail, the Programme for Government commits toward continued investment in, and improvement of, our intercity rail network. In 2021, a Strategic Rail Review will commence and will be conducted on an all-island basis. This Review will examine all aspects of rail connectivity

¹⁶ <https://www.nationaltransport.ie/nta-publishes-issues-paper-ahead-of-revising-greater-dublin-area-transport-strategy/>

¹⁷ https://www.nationaltransport.ie/wp-content/uploads/2020/04/Cork_Met_Area_Transport_Strategy_web.pdf

¹⁸ https://www.nationaltransport.ie/wp-content/uploads/2020/09/Draft_LSMATS_Report.pdf



between the major urban centres on the island, between and within the regions, and also examine the rail connections to the major sea- and air-ports, including the potential for freight.

The recently published EU Sustainable and Smart Mobility Strategy calls on Member States to increase investment in rail freight and proposes a number of complementary measures at European level to support that proposed investment. The Strategy's goal is that rail freight traffic within the EU will increase by 50% by 2030 and double by 2050.

Air Freight

Air freight to and from Ireland consists primarily of high value products e.g. technology or medical devices/components, as well as short life food products e.g. seafood. All air freight arrives or leaves Irish airports by road. Significant volumes of air freight also travels by road and ferry to or from UK airports.

There are, however, limited statistics available on what amount and type of freight comes in and out of Ireland by air. Better statistics on air freight would be useful to assess whether other policy considerations related to air freight should be further explored.

Globally, approximately 60% of all air cargo travels in the belly hold of passenger aircraft operating regular scheduled air services, with the remainder travelling with dedicated air cargo operators. With so many passenger services suspended due to the COVID-19 crisis, demand for air cargo capacity has increased which has increased the price per kilo of air cargo. Despite this, key air routes ensuring Ireland's connectivity for essential reasons, including import and export, continue to operate.

Ports and Airports

Most freight in and out of the country arrives at our ports and airports by road. The importance of ports and airports in the context of regional connectivity continues to be emphasised and consideration will need to be given to improving the connectivity of the North and West to State Airports and Ports.

Plans that strengthen surface connectivity to ports and airports will continue to receive priority such as for high-quality roads and public transport that will allow key infrastructure to meet the anticipated future demand from passengers and freight. In particular, there is a need to provide investment to ensure rail freight connectivity to the Ports of National Significance and improved sustainable mobility connections to the State Airports. Specifically in relation to road access, a number of prospective projects have been identified.

For ports it is important that high-quality road projects are prioritised to improve access and hinterland connections for the movement of goods. While as mentioned above rail freight currently plays a limited role in Ireland, there are opportunities for expansion through both targeted investments across the rail network and in ensuring rail connectivity to all the Ports of National Significance.



In relation to Brexit, a key aspect will be to analyse the emergence changing trade patterns in the context of the post-Brexit settlement and develop projects to improve connectivity where bottlenecks emerge.

A review of Ports Policy is due to commence at the end of 2021 which will consider again overall port capacity and connectivity needs.

A new National Aviation Policy will be developed to provide a framework for the sustainable recovery and development of the Irish aviation sector over the course of the next decade.

Questions

- Is freight transport being taken into account sufficiently within Ireland's integrated transport planning system, particularly the various transport strategies for urban areas?
- Urban area transport planning strategies allow for the introduction of specific delivery arrangements in large urban centres and low impact delivery schemes. Are such initiatives working well?
- Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?
- What are the barriers which prevent movement of freight by rail?
- What further action is needed to improve the hinterland connectivity of Ireland's ports and airports, particularly in light of Brexit?



Industry Questions

Topic	Question
COVID-19	What lessons can be learnt from the COVID-19 pandemic, in terms of Ireland being better prepared for any future pandemic and to help the resilience of Ireland's supply chains?
	Are there any suggestions for policy support to address the challenges that have been experienced as a result of the COVID-19 pandemic?
Brexit	What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?
	How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?
Environmental/Decarbonisation	What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?
	What is needed to incentivise less polluting Light Commercial Vehicles?
	Should eco-driver training be rolled out further, for example, as part of Driver CPC training?
	Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?
	How can we work to promote more efficiencies within the sector? Please refer to any best practice examples that you may have come across, whether in Ireland or abroad.
Road Safety	What are the road safety priorities in road haulage for the next 10 years?
	How are these priorities best addressed?
	What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?
	What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?
	Do you have any other comments on road safety matters?
Mobility Package	What are your views on how Ireland implements the Mobility Package changes?
	What are your views on the return of the truck?
Road Infrastructure	Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?
	What more is needed in relation to road user charging for freight transport in Ireland?
Labour Market/Skills	How can more people be encouraged to take up work in the road haulage sector, <i>e.g.</i> , as HGV drivers, Transport Managers, customs roles, <i>etc.</i> ? Please provide concrete suggestions/best practice examples.



	How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?
	How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?
Intermodal Transport	Is freight transport being taken into account sufficiently within Ireland's integrated transport planning system, particularly the various transport strategies for urban areas?
	Urban area transport planning strategies allow for the introduction of specific delivery arrangements in large urban centres and low impact delivery schemes. Are such initiatives working well?
	Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?
	What are the barriers which prevent movement of freight by rail?
	What further action is needed to improve the hinterland connectivity of Ireland's ports and airports, particularly in light of Brexit?



Annex I: Haulage Sector Statistics Sources

CSO Road Freight Transport Survey

<https://www.cso.ie/en/statistics/transport/roadfreighttransportsurvey/>

CSO Transport Omnibus 2019: Road freight transport

<https://www.cso.ie/en/releasesandpublications/ep/p-tranom/transportomnibus2019/roadfreighttransport/>

Irish Bulletin of Vehicle and Driver Statistics

<https://www.gov.ie/en/collection/8e3576-irish-bulletin-of-vehicle-and-driver-statistics/>

CSO Statistics of Port Traffic

<https://www.cso.ie/en/statistics/transport/statisticsofporttraffic/>

Irish Maritime Development Office (IMDO) Quarterly Statistics

<https://www.imdo.ie/Home/site-area/statistics/quarterly-statistics/quarterly-statistics>

Eurostat Transport Database

<https://ec.europa.eu/eurostat/data/database>