



Irish Aviation Authority (IAA) submission

Response to the public consultation in advance of the transposition of the revised Clean Vehicles Directive (EU) 2019/1161

Submission received by Department of Transport on 31 December 2020.

Responses to public consultation questions:

1. Can you outline expected changes to procurement practices for your organisation?

No difference for vehicle procurement.

2. Can your organisation achieve cost-effective implementation of the Directive? Can 'price premiums' for low- and zero-emission vehicles be accommodated within your existing budget lines? Please indicate any changes expected to resourcing requirements.

The IAA does not foresee any budget issues with implementing the directive.

3. Please outline any other factors which may challenge your organisation in terms of financial costs e.g. supplier shortage; costs for supporting infrastructure installation; availability of public recharging/refuelling infrastructure, changes required to the fleet composition?

The IAA is already in the process of implementing a support infrastructure and changing fleet. There are no further unforeseen challenges expected at this stage.

4. If higher clean procurement targets were to be implemented, in line with the policy ambitions set out in the Programme for Government – Our Shared Future (2020), would your organization be in a position to comply? What challenges (if any) would exceeding the minimum targets present to your organization?

The IAA would be in a position to comply with this, but may face challenges with suitable alternatives to three of its fleet vehicles (large 4x4 SUV's required to reach remote sites).

- 5. It is the aim of the State to ensure that changes to procurement practices are not excessively onerous for public sector bodies. From the perspective of your organisation, indicate if the application of minimum targets to all relevant procurements is preferable to the application of targets over the aggregate. When answering, please consider the administrative and regulatory changes required to monitor progress if the minimum targets are to be achieved over the aggregate of procurements between 2021 and end-2025.**

The IAA has taken these issues into consideration and already captured these practices within its Sustainability Management Plan and procedures.

- 6. Would your organisation benefit from flexibility to meet the minimum targets in the aggregate of your procurements?**

The IAA has a small fleet and as such does not foresee any issues.

- 7. From your procurement experience to date, can current market supply facilitate a proportion of clean vehicles in all new procurements?**

All except for three vehicles (large 4x4 SUV's required to reach remote sites) can be facilitated for at present.

- 8. There is a risk of procurement happening in the last stages of the Directive's reference periods. This backloading of procurement could result in targets being missed due to supply constraints. In order to avoid backloading targets, would your organisation be able to meet certain minimum percentages, say 50%, of the procurement targets per year by end 2023?**

Yes.

- 9. Please advise any sector-specific/function-specific considerations which may compel the distribution of lower targets to your organisation. When answering, please consider appropriate alternative approaches to ensure that Ireland can meet the minimum targets in the aggregate.**

N/A - This does not apply to the IAA.

- 10. From your procurement experience to date, is it feasible to expect that the market will be sufficiently advanced to apply the Directive to non-typical vehicle types i.e. national exemptions?**

N/A - This does not apply to the IAA.

- 11. Are there certain categories of vehicles you feel shouldn't be exempt?**

N/A - This is not relevant to the IAA fleet.

- 12. Is the proposed reporting mechanism suitable for the purposes of providing fleet and procurement data, or can you indicate a more appropriate alternative approach?**

Yes, the proposed mechanism is suitable.

- 13. Please advise estimated additional administrative or compliance burden associated with the provision of fleet and procurement data.**

The IAA already captures the relevant information for reporting and foresees a minimal additional administrative and compliance burden to adhere to the provision.

End of submission.