

Climate Change Unit
Department of Transport
ClimateChangeUnit@transport.gov.ie

23rd December 2020

Consultation EU Clean Vehicles Directives

Dear Sir/Madam,

Thank you for the opportunity to respond to the EU Clean Vehicles Directive. I set out below the submission by Iarnród Éireann (IÉ).

Introduction

The Clean vehicle directive applies to cars, vans, trucks and buses but not coaches. The Directive does not apply to rail which comes under the Non-Road Mobile Machinery Directive. IÉ manages a sizeable fleet of road based vehicles under its Road Fleet Department.

The IÉ Road Fleet Dept will be on target to meet the directive on passenger vehicle (cars) before 2026. Commercial vehicles may not reach that deadline due to the limited availability of clean vehicles in these categories of Light Commercial Vehicles at present, however there are some promising vehicles in the pipeline that may fit our business requirements. There are some specialised vehicles we have that will be excluded from this directive e.g. Overhead Line Equipment Trucks, Chief Mechanical Engineer breakdown truck, Infrastructure Manager Welders trucks and various Agri and construction vehicles we have in Portlaoise and Rosslare.

Questionnaire Response

Appended below are the specific responses to the series of questions posed as part of the consultation process.

Q. Can your organisation achieve cost-effective implementation of the Directive?

Response: No provision has been made for the increased cost to replace diesel vehicles from 2021 to 2025.

Q. 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 left composition?

Response: Internal Electric Vehicle (EV) infrastructure has been installed to address the current transition from diesel to EV for vehicles received in 2020 (20+) with the installation of charging points in a number of locations, significant costs need to be assigned to the existing budgets to allow for further expansion across the business.

Q. 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 organisation be in a position to comply? What challenges (if any) would exceeding the minimum targets present to our organisation?

Response: We could comply with vehicles being replaced in 2021 (90+), however the longer term would need to be explored for suitability in vehicles type, options, range charging etc.

Q. 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.

Response: We aim to achieve our minimum targets over the aggregate of vehicles renewals.

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

Response: Yes, however some vehicles will remain as diesels.

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

Response: Yes

Q. There is a risk of procurement happening in the last stages of the Directives reference periods. This back loading of procurement could result in targets being missed due to supply constraints. In order to avoid back loading targets, would your organisation be able to meet certain minimum percentages, say 50%, of the procurement targets per year end 2023.

Response: No, apart from 90+ vehicles due for replacement in 2021, our next significant vehicle renewal will not likely take place until 2024, however there is considerable scope to bring this forward depending on funding approval being granted.

Q. Please advise any sector specific/function specific considerations which may compel the distribution of lower targets to your organisation.

Response: Providing there are appropriate vehicles available, along with the appropriate on-site charging solutions and charging timings and capacity.

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

Response: No, exemptions will be required for some of our specialised rail vehicles, and specialised response vehicles.

Q. Are there certain categories of vehicles you feel shouldn't be exempt?

Response: No

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jim Meade", with a long horizontal flourish extending to the right.

Jim Meade

Chief Executive