



An Roinn Iompair
Department of Transport

Ten-year Strategy for the Haulage Sector

Public Consultation

Submissions by Recipient

Overview

In line with the Programme for Government and the Climate Action Plan 2021, the Department of Transport is developing a ten-year strategy for the haulage sector. The aim is to produce a strategy that will focus on generating efficiencies and improving standards, and helping the sector move to a low-carbon future.

The Department launched the first phase of its a public consultation on 9 April 2021 to seek views on the development of this strategy. On 16 June 2021, the Department of Transport hosted a Haulage Strategy Webinar which included an address from Minister of State Hildegard Naughton TD and presentations and Q&A with over 50 stakeholders across the haulage and logistics sector. Freight and haulage representative organisations, as well as those working in the wider transport, logistics and supply chain sectors including in further education, training and academia attended the online event. The twelve-week public consultation ended on 16 July 2021.

A total of forty-three (43) submissions were received in response to the public consultation. Respondents included State bodies; academia; industry interest groups; private individuals; and elected representatives, amongst others. Full submissions are included below.

The Department of Transport wishes to thank those who took the time to respond to the public consultation. All contributions will help to inform and enhance the development of the strategy for the haulage sector.

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Friday, 16 July 2021

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Ten-year Strategy for the Haulage Sector, our response to Sections 3 and 8

To whom it may concern,

The climate emergency requires urgent action to deliver absolute emissions reductions.

Yet it is hard to separate air quality policy (clean/blue) from carbon emissions reduction (GHG/CO₂e/green) in the briefing document. Public discourse often conflates the two topics e.g. Low Emissions Zones are now decarbonisation zones with no clear definition of what the minimum vehicle emissions standard will be.

Our response assumes any final strategy will prioritise reducing greenhouse gas emissions – of which CO₂ is by far the largest by volume and most persistent – in line with Ireland's 51% reduction target to 2030 vs 2018 (7% per year) and the EU's 'fit for 55' by 2030 (vs 1990).

The EU 'Fit for 55' programme – whilst welcome in its ambition - proposes to add another layer of reporting and overhead cost to haulage in the **form of a new transport specific Emissions Trading Scheme (ETS)**; to an industry which already deals with the carbon tax, NORA levy, EEOS levy, and will in time pay for road use per km.

Whatever the outcome of the strategy, we must not miss the opportunity to gather data on Tonnes carried, Km travelled as well as Litres consumed (DRS); can we suggest the Dept consider the lessons learnt from Ireland's successful transport EEOS programme (2014-20 detailed over), and **consolidate the various levies and reporting to ensure all fuels and modes contribute to climate action in line with their CO₂e emissions and evidence is collated for policy?**

Transport can deliver quick reductions in CO₂e funded by commercial entities, uncertainty in how solutions will be treated by policy and Revenue delays implementation. A **consolidated levy based on standardised CO₂e factors** allows all options to be tested, temporary discounts can be applied to kickstart initiatives as solutions become available.

Well done on the clarity of the 10 Year document and the simplicity of the AFHDV grant application to date, looking forward to the sustainable logistics debates to come.

Yours sincerely



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Who are AEMS ECOfleet

Established in January 2005, AEMS are independent energy advisors, trainers and auditors. We do not sell or endorse any one technology, fuel or energy source.

15 years on, we have worked across Europe (with over 100 active fleet customers, several large 50001 certified fleets and supply chain programmes in operation.

As a founder member of [EENE](#) and invited expert on the [Global Logistics Emissions Council \(GLEC\)](#) panel we can help business reduce emissions across borders and languages.

Since 2006, the 'ECO' in our services stands for: **E**nergy efficient, **C**ontinuous improvement, **O**bjective measurement. Our web-sites; <https://aems.ie/> | <https://ecofleet.ie/> | <https://ecodrive.ie/>

Conor Molloy

An **AI Gore Climate Reality leader** since 2018, Conor has been helping business save fuel and manage their energy use for profit and planet – to reduce their CO2/GHG emissions – since 2005.

Accepted as a member of the Association of Energy Engineers ([AEE](#)), Chartered Institute of Logistics and Transport ([CILT](#)), Freight Transport Association Ireland ([FTAI](#)), and the Efficiency Valuation Organisation ([EVO](#)). He is a registered energy auditor.

In 2018 Conor was invited to join the [Global Logistics Emissions Council \(GLEC\)](#) expert panel based on his work as the designer and implementer of the EOS funded [ECOfleet programme](#), where over 100 Irish freight operators get paid for their fuel and CO2 savings.

Elected president of the Association of Energy Engineers Ireland Chapter in May 2020; Conor is an independent energy advisor with an MSc in Energy Management and Renewable energy from University of Ulster, he is a Certified Energy Manager (CEM), Measurement & Verification professional (CMVP) and qualified trainer (QQI) for Climate Action, Transport, ISO50001 and Smart Freight's Transport Manager training.

An **experienced facilitator**, he has trained EU and Member State Officials, over 250 Lead Assessors in Transport Energy Auditing for ESOS (UK) and across the EU, led the publication of EN 16247-4 Europe's transport energy audit standard and contributed to ISO50004 – the original guide to ISO50001. He will shortly deliver AEE's first global transport training programme Aug-Oct 2021.

The greenest, most profitable energy is the energy you do not use –2006 (now AEMS).

Full disclosure

ECOfleet is trademark and service of authentic solutions limited since 2006, at various times we have worked with SEAI the national energy authority, IPIA/Fuels for Ireland members and other energy suppliers to deliver measured energy savings in L/100km and CO2e. **2020 ECOfleet partners included**



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Objective

In line with the Paris accord to limit global warming to 1.5degC freight must reduce its emissions by at least 80% to 2050 whilst growing its volumes by 230% - ITF

The EPA's Ireland's Environment – An Integrated Assessment 2020 states C13 *“The stated ambition for climate neutrality by 2050 implies that Ireland will need to eliminate greenhouse gas emissions from land transport almost entirely by then.”*

Many operators have stated more ambitious targets than in the PfG and Climate Act 2021 with climate neutrality or net zero by 2030 often cited.

In Ireland we have a -51% target to 2030 whilst population is projected to grow by 10% to 2030 (and 20-40% by 2050 – CSO) and therewith freight volumes to a 91% increase in Tonne.Km to 2050 (source DoT).

Since 2012 we have designed and delivered a CO₂ reduction programme in the form of our **EEOS¹ funded** and **SEAI regulated²** ECOfleet programme.

This rewards hauliers for their (relative) performance improvement based on primary (measured) data submitted quarterly.

The results of the overall programme are summarised right and below.

- 89,476 t CO₂e avoided 2014-20
- over €750,000 paid to licenced operators
- over €56m in avoided fuel use.

Of 120 registered operators (mainly hard to engage SMEs), 87 carriers saved enough energy to be paid a bonus by Enprova. The scheme is regulated by SEAI under the EEOS, funded by Enprova under EEOS and partnered with the Global Logistics Emissions Council and Smart Freight Centre (NL).

Freight's carbon budget

DoT's Transport Trends 2020 states transport emissions amounted to 12.2m t CO₂e in 2019 down 0.3% vs 2018 with HDVs accounting for 17.8% or 2.1m tCO₂e – this makes our carbon budget for HDVs in 2030 roughly 1m t CO₂e; **the message needs to be to reduce in absolute terms by 7% per annum starting in 2021.**

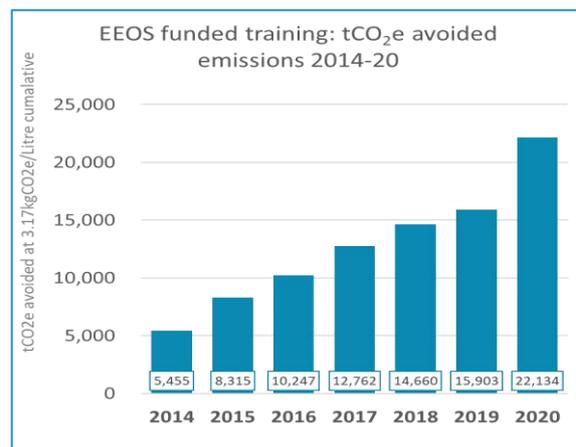


Figure 1 ECOfleet cumulative CO₂ avoided 2014-20 under EEOS

¹ S.I. No. 131/2014 - European Union (Energy Efficiency Obligation Scheme) Regulations 2014.

² SEAI webpages and explanations <https://www.seai.ie/business-and-public-sector/business-grants-and-supports/energy-efficiency-obligation-scheme/>

Strategy

With HDVs lasting 10-15 years, aircraft 20+ years and locomotives over 40 years, debate often centres around alternative fuels, indeed the [FTAI Alternative Fuels working group](#) has been actively facilitating this debate since 2018.

A broader approach is needed if we are to meet our climate goals; we, the UN, ITF, EPA, SEAI and indeed the Dept. have long proposed the adoption of the full **Avoid, Shift Improve + fuel (ASI³) model**.

Lessons learnt from Smart Freight Centre’s Global Logistics Emissions Council show the need for **collaboration across the entire economy is also key to delivering measurable reductions**.

- How will the government and its regulators facilitate and speed up such collaboration?
- Whilst maintaining competition and limiting new vehicle dimensions and form factors?

Avoiding freight transport

Circular Economy recognition by state agencies of industry led performance programmes would show freight leaders the government is serious about meeting its climate action goals. Helping leading Irish companies to identify efficient freight operators, improving overall competitiveness and securing jobs.

Online delivery to home has surged in the last 18 months with the Christmas peak now becoming the norm year-round. However **the ‘batch of one’ is an inherently inefficient** supply chain with large volumes of air (in packaging) being shipped by large numbers of vans using similar routes.

Whilst shippers and carriers do **reduce volumes** e.g. by using bags not boxes, we must support urban and town centres with shared services for **collection and returns** (reducing ‘reverse logistics’ volumes).

Vans vs trucks

In public discourse and much political debate, heavy goods vehicles are viewed negatively from a safety and an emissions perspective. The Dept and its agencies can lead in communicating the balance of emissions and risk e.g. the 10+ vans needed to replace an 18t truck in urban delivery would increase safety risks and emissions at least 4-fold (10 x 10L/100km = 100L/100km vs 1 x 25L/100km).

Dimensions

Longer lower vehicles offer increased capacity whilst reducing fuel cost and GHG emissions; however policy and politics seem to say that longer trucks are unwelcome in Ireland.

Learning lessons from the delays in electricity grid upgrades, **we must raise awareness of the importance of size** e.g. a 10% increase in vehicle load capacity reduces journeys by 10% or 1 in 10.

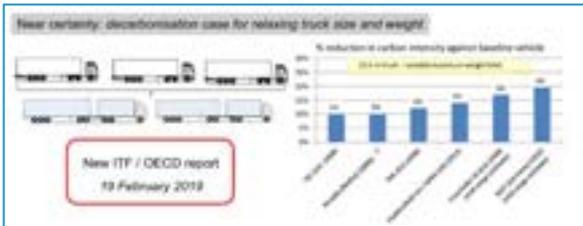


Figure 2 case for relaxing size and weight limits Prof Alan McKinnon – LEARN Project 2019

3 The ASI³ framework was devised by Schipper and Marie (1999) and adopted by the IPCC (Kahn Ribeiro et al, 2007; Sims et al, 2014) and widely cited by UN, ITF and others including the Dept and EPA.

Shifting mode

Many studies show cycling and active travel will make a bigger impact on city transport emissions faster than our switch to electric cars; e.g. <https://theconversation.com/cycling-is-ten-times-more-important-than-electric-cars-for-reaching-net-zero-cities-157163> - segregated cycle lanes encourage modal shift and help to free streets for deliveries to local businesses.

Operators such as DPD and An Post have made significant investments to electrify their van fleet and move last mile deliveries to cargo eBikes, but there is little visible support from Government or indeed city planners for commercial vehicle accessible on-street charging or dedicated parking.

Moving freight from road to rail makes sense where distances are long (typically over 300km). Shifting deliveries from van to cargo bike is also mode shifting and should be prioritised with clearer signals from government such as;

- ❑ **Clarifying the minimum emissions rating for decarbonisation/low emissions zones** in our seven cities (Euro VI with AdBlue – highlighting the value offered by cargo eBikes vs older Euro 1-6 vans).
- ❑ Pro rata grant aid and/or **showing the combined supports for electric cargo bikes** in ACA's and free parking etc. when highlighting grants for heavier vehicles.
- ❑ **Removing the de minimis rule from electric van lessors** specifically, so that SME's can avail of leasing options when replacing older (more polluting) diesel vehicles.

Shifting freight to rail **requires sustained support by government** to maintain rail links between freight nodes such as ports. The recent closing of Dublin Port to rail freight from the west highlights the lack of support – and/or policy communication – to key operators.

Distance is the primary driver of energy use and emissions, so industrial and housing planning should encourage node to node efficiency be it by rail or road vs last mile to dispersed locations.

Waterford Port is our closest port to the EU and has active rail and motorway links yet it does not seem to feature highly in government communications.

The second biggest driver of fuel use is weight; the lightest mode or vehicle by unladen weight should be incentivised i.e. the cargo ebike over the small van.

- ❑ Unladen Weight (ULW) does not feature in government tax or incentives but it should be considered when setting road prices per km in the years to come – **ensure ULW is captured accurately in the national vehicle database from now on.**

Improving performance

Operators focus on improving truck performance to improve profitability; our ECOfleet programme (and we are sure the AFHDV grant) show SME operators will engage in a CO₂ reduction programme when it is configured to SME capacities in terms of paperwork and rules.

Note ECOfleet is **EEOS⁴ funded** (commercial not govt.) and **SEAI regulated⁵**. This rewards hauliers for their (relative) performance improvement based on primary (measured) data submitted quarterly.

The results of the overall programme are summarised right and below.

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Figure 3 ECOfleet cumulative CO₂ avoided 2014-20 under EEOS

Fuels – alternative and electric

Although the Dept has made a welcome start with the AFHDV grant and operators have been proactive in investing in CNG, and lately electric vehicles, **alternative fuels really should be the last thing we do in a sustainable logistics strategy** i.e. after we have exhausted all the opportunities to avoid, shift and improve only then should we look at alternative fuels (ASIf).

- HDVs have an average life of 10-15 years in Ireland so the trucks being imported now will still be on our roads in 2030 and well beyond; how will we fuel these vehicles?

An option for specialist vehicles is to **retrofit them with battery electric powertrains**, a certification programme is to be published shortly in the UK by ZEMO and an active CE marked programme already exists in the Netherlands (and its training programme here via [New Electric Ireland](#)).

HVO – Hydrotreated Vegetable Oil

A Sustainable Aviation Fuel (SAF) is needed as 35% of Ireland's exports by value go by air.

- When made from wastes and green hydrogen, HVO can deliver 80+% CO₂e/GHG reductions and cleaner exhaust emissions from existing diesel and aero engines. **As an island with a need to decarbonise heavy goods vehicles for exports surely there is a case for supporting for HVO?**

The fuel supply industry is (apparently) waiting on government, excise can be waived to accelerate demand in the forthcoming 2022 budget for this bridge fuel to electric HDVs.

NB although the available data and papers show HVO burns cleaner than diesel, it is somewhat less volumetric efficient i.e. slightly more will be burnt for a given engine output (just like CNG).

⁴ S.I. No. 131/2014 - European Union (Energy Efficiency Obligation Scheme) Regulations 2014.

⁵ SEAI webpages and explanations <https://www.seai.ie/business-and-public-sector/business-grants-and-supports/energy-efficiency-obligation-scheme/>

Possible Actions (based on Prof Alan McKinnon's top 10)

Over the last 20 years much research⁶ has been done applying the Avoid Shift Improve (fuel) model to reducing freight emissions.

It is not possible to collate all of this and the results into a single submission, however [Prof Alan McKinnon](#) has spoken often on this topic in Ireland and his slide (right) provides a useful summary of the low hanging fruit available to the Dept and operators.

In terms of quickest returns the EU funded LEARN project categorised these actions over time in 2019 as:

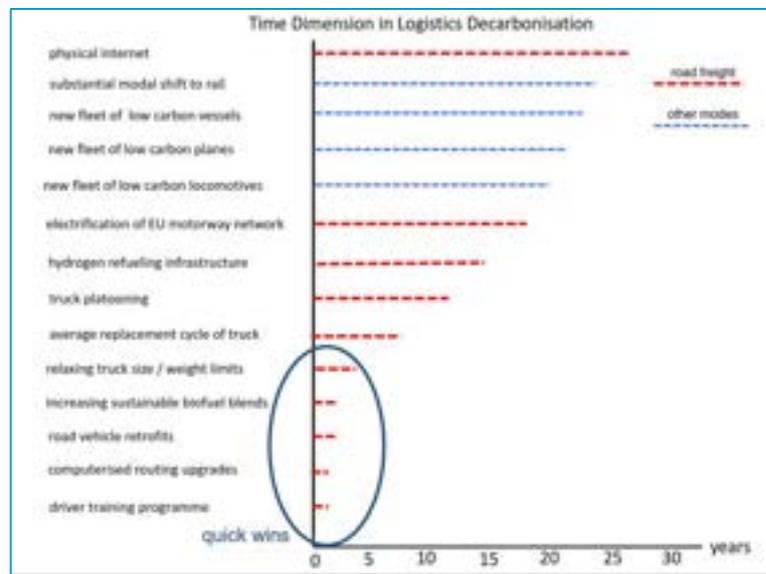


Figure 4 Prof Alan McKinnon – LEARN Project 6-7th February 2019

1. Driver training – we advocate **results based training** carried out in cab (minimise classroom) since bringing the EU funded ECOdriven/ECOwill programmes to Ireland in 2006 (Enprova funded 2012)
2. **Routing upgrades** i.e. planning and back haulage to improve load factor
 - If Building Energy Management Systems can qualify for grants and ACA, why can't telematics and planning software investments in vehicles that often use far more energy?
3. **Retrofits of vehicles** to include actions such as
 - **Aero dynamic kits** to reduce parasitic drag above 60kph (HGVs can average 50kph)
 - **Electric power take off (ePTO)** replacements e.g. electric pumps to replace diesel
 - Retrofitting of specialist vehicles which have very long operational lives from diesel to battery electric should be considered (won't qualify for current grant schema)
 - **Light weighting** of bodywork and trailers promoting aluminium over steel where practicable reduces energy use and increases payload (again no supports/grants now).
4. **Increasing biofuel blends** from wastes s already well advanced in Ireland and promotion of same should be a priority for government e.g. as operators have worked with 6% to date without incident, they should be made aware to increase their confidence in alternative fuels
 - **Where is the support for Hydrotreated Vegetable Oils (HVO)** from waste, we understand Whitegate has the technical capacity to produce, yet all currently supplied HVO comes from Rotterdam.
 - Using green (wind generated) hydrogen in Cork and/or Foynes must be an opportunity to provide sustainable liquid fuels to HGVs and in time aviation i.e. as HGVs transition to BEV/FCEV the infrastructure can be reused in aviation (aircraft have a 20+ year life) or rail (40+year life for locomotives).

⁶ We have ready access to this research and test data via our membership of the GLEC and are happy to help the Dept and Irish academia access same as we have done for ECO_HDV and similar projects.

5. **Relaxing HGV weight and size limits** is politically challenging, but learning from Eirgrid's challenges in grid and renewable investments is there not a role for the Dept in communicating the benefits of longer and higher capacity trucks to the public?
6. New vehicles are welcome and the AFHDV grant even more so, but can we **stop importing very old polluting vehicles from the UK**? These only add to our emissions now and in decades to come.
7. *Truck platooning is no longer considered practicable in real world use despite its projected benefits in driver rest and reduced aero dynamic drag on motorway journeys (even since 2019).*
8. Hydrogen Mobility Ireland have started on the 5+ year regulatory journey to providing hydrogen refuelling in Ireland; lessons learnt from CNG roll-out **should mean that regulators now work in parallel and no longer in sequence as this led to multi-year delays in CNG roll-out.**
9. Electrifying Ireland's railways entirely would greatly help reduce emissions from passenger and freight transport.
 - Current DART plans use 1500Volt DC (as do the Netherlands and others) and this may prove adequate for Ireland, if conversion of the network is to be considered it should **use 10,000V to eliminate the 30+% losses** in transmission and make trains as energy efficient as possible.
 - In the meantime upgrading the existing two stroke diesel electric freight locos is unlikely to deliver the necessary emissions reductions and **electrification of motorways with catenary power for HDVs should be considered in parallel to any electrification of the railways for freight.**
10. **New aircraft and vessels** are likely well beyond the remit of the Dept, however facilitating same must form part of a 10 year haulage strategy. The new EU 'Fit for 55; transport only ETS and aviation ETS funds should ensure LNG at our ports for short sea shipping and long-distance trucks, hydrogen refuelling every 150km and at motorway junctions close to airports etc. to ensure the infrastructure we have (e.g. the gas network) is utilised as the industrial and domestic heat demand switches to electricity and heat pumps.

Useful links

The following links may prove helpful in **facilitating debate** within the Dept and externally;

- Technical **Long-Haul Lorries Powered by Hydrogen or Electricity?** by Prof David Cebon The Centre for Sustainable Road Freight (Cambridge UK) <http://www.csrf.ac.uk/2020/02/blog-long-haul-lorries-powered-by-hydrogen-or-electricity/> an accessible article on the merits of hydrogen fuel cell vs battery electric for heavy goods vehicles.
- Communications **Eirgrid - How the grid works** a useful example of how the Dept can promote the basics of sustainable logistics in public discourse built on lessons learnt from interconnectors and wind power objections <https://www.eirgridgroup.com/how-the-grid-works/>
- Digitalisation **Shop local** - Pointy an Irish start-up (since bought by Google) that promotes local shops local stock and helps to **reduce the need for batch of one deliveries** <https://www.irishtimes.com/business/technology/pointy-offering-free-devices-to-smes-who-want-to-sell-online-1.4506297>

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

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

What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

Assuming “less polluting” means less CO₂:

- **Operational incentives and permissions** are needed e.g. prioritise double length trailer licences to clean and green HDVs, likewise the excess weight derogations for alternatively fuelled HDVs should be communicated to dealers and operators alike.

Whilst the AFHDV is (so far) a model of simplicity and SME accessibility; Grants can be nightmare for SMEs to complete due to the necessary compliance rules. Time lags mean the compliant and/or trained operator may no longer be compliant by the time the payment is due and/or staff turnover may have changed the operational environment.

The EU ETS is a duplication of the NORA levies, the same taxes and incentives can be raised via the existing carbon tax whilst accelerating electric vehicle uptake amongst light duty vehicles.

- We argue that the projected carbon tax increases to 2030 to be offset via the Diesel Rebate Scheme for EURO VI+ vehicles engaged in a performance management programme only, further incentivising newer vehicle uptake in the second-hand market.
- Any such scheme necessitates **formal recording of EURO emissions class in the National Vehicle Database** a hit and miss affair at the moment and a much-needed input for Government statistical reporting into the future.

What is needed to incentivise less polluting Light Commercial Vehicles?

Price parity for electric light vehicles is likely by 2023, removing the need for grant-based incentives. Dept focus should be on **making government funded chargers accessible to commercial vehicles** as many are not now due to space, barriers or short cable lengths. **Learn from Norway and place chargers in island hubs not edge/corners of parking areas.**

Grid connections for EVs

Operators have watched with frustration the delays in CNG station opening due to regulatory delay, as each regulator works in sequence to the last.

Anecdotally we are already hearing of delays for van and bus depots accessing grid connections, it seems unfair that new (additional demand) connections enjoy priority access whilst SMEs do not.

Whilst these anecdotes are always complicated and very much site specific, we do think that a transparent and open methodology is needed to **prioritise decarbonisation of existing transport services over new demand** for connections to both the gas and electricity grids.

Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

Ireland already ranks poorly for empty running (**40% according to Eurostat⁷**).

How would government policy better facilitate collaboration across supply chains to reduce empty running, dead heads and increase backhaul / reverse logistics?

- The recent publication of the **circular economy legislation** provides a good basis to increase collaboration across supply chains; as empty vehicles may need to carry load from much more diverse customers than now to reduce empty running. However clarity is needed if competition law is not be invoked late in such projects.

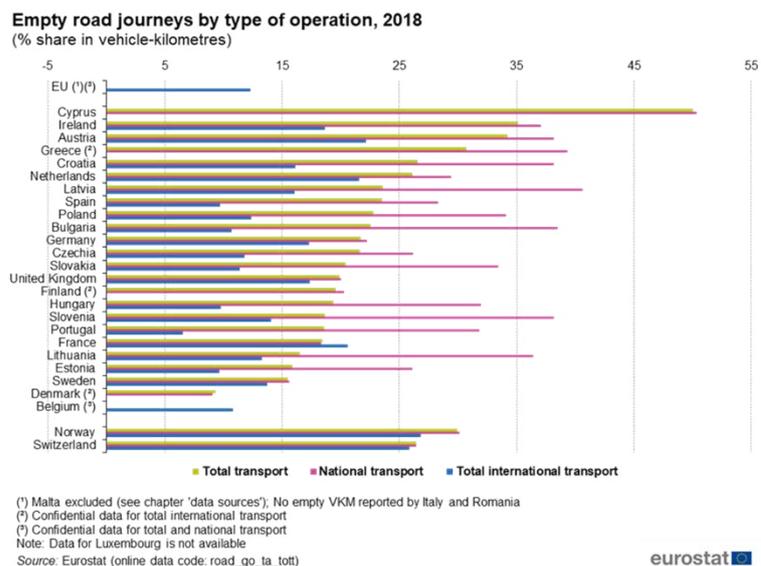


Figure 6 Eurostat graphic showing Ireland one of the poorest for empty running

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.

- As invited members of **Smart Freight Centre** we will of course cite their **global network** of partners which include the decade old US SmartWay programme as well as Australia and Chinese equivalents. Govt to Govt introductions can be made for direct discussion – an email will suffice.
- **ZEMO** (formerly LowCVP) offer a vast library of materials and papers on this topic.
- Online tools with calculations are also available via <http://www.csrf.ac.uk/> and others.

Broadly the Dept as a neutral party can be a trusted source/promoter for the fundamentals of sustainable logistics to government, the public and the political debate.

This is important as many misconceptions exist which will slow and stop (if Eirgrid experience in anything to go by) science-based initiatives in haulage and sustainable logistics over the next 10 years.

The industry is already well served by international best practice and academia (see above), the Dept should set a high bar for new academic funding to ensure it adds to the knowledge base; in the meantime **Irish based academics can independently review of the results of industry initiatives to policy makers i.e. encourage industry to share data with quicker responses from academia.**

⁷ [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Empty_road_journeys_by_type_of_operation,_2018_\(%25_share_in_vehicle-kilometres\).png](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=File:Empty_road_journeys_by_type_of_operation,_2018_(%25_share_in_vehicle-kilometres).png)

This approach would help **equip Irish academia with real world data** for their models now to support policy making into the future, it would also help industry to 'fail early' before investments endanger company viability, whilst allowing them the freedom and speed to test and pilot innovative solutions.

As discussed above clear communication of the balance of risks and benefits from the Dept and its agencies to the public at large would greatly help the haulage sector achieve its climate goals.

Summary

Our summary of the above suggestions for debate

1. **Recognise fuel & energy efficiency / performance-based programmes** from [FTAI](#), [IRHA](#), [Irish Exporters Association](#), [Smart Freight Centre](#) and others by prioritising them for scarce renewable resources – there is no point in using a renewable fuel, hydrogen or electric in an inefficient fleet.
 - **Relative performance improvement in L/100km** is the first step to the absolute emissions reductions required; Litres and Km from **primary data sources** provide a solid foundation for action and reporting (vs figures derived from financials).
2. **Prioritise the elimination of waste** in empty running, narrow delivery windows, and part loading – support digitalisation in planning, software and telematics use across the sector.
3. **Avoiding** and reducing freight volumes should be an integral part of Ireland's circular economy strategy even as it increases volumes with reverse logistics
4. **Shifting** freight from vans to cargo ebikes requires prioritisation of parking for mobile warehouses and similar hubs in urban areas. Ensuring freight stays on efficient HGVs as long as possible means building parcel hubs and loading bays along with segregated cycleways.
5. **Improving** performance is every fleet operators' day job but it would be greatly helped by clear communication of long term targets and short term tactics across government; let us not repeat the delays of CNG in battery or hydrogen electric vehicle upgrades.
 - **The future is zero emission**, cost parity will likely arrive sooner than we think, and the country must be ready with access to the grid and gas network/refuelling infrastructure years in advance, this requires funding, but it also requires regulatory bodies to be in alignment if they will not work in parallel.
 - **Ecodriving training** is a proven solution, as is **energy management** in the form of ISO50001 or at a lower level FTAI's Green Certificate and EEOS funded programmes; funding would be nice but recognition would be a faster route to delivering measured savings.
6. Availability of alternative **fuels from wastes and green hydrogen** such as HVO and SAF, must be accelerated to ensure the new and second hand vehicles being put on our roads today have a pathway to lower emissions. .
7. **Communicate the need for absolute reductions vs relative performance improvement**; the climate act makes it clear that absolute reductions are needed, the industry has the tools, the will and the means to deliver but clear communication is needed from government.
 - **Prioritise CO₂ reduction over AQ in Dept communications**, both are important and health will win over planet but we must be clear in our communications to reduce GHG/CO₂e.
 - **Clearly define what the government considers to be a clean vehicle** now; so the industry has a benchmark against which to improve (e.g. Euro VI with AdBlue as a baseline).
8. **Task academia with reviewing results** of industry programmes, not researching solutions already well proven elsewhere; enhance academic output and government policy with real world data.

9. Quick actions – no research required;

- A **single standard list of CO₂e by fuel type and mix** published in layman's terms per price unit e.g. kg of CO₂e per Litre of road diesel **updated annually**; that also takes account of diminishing energy content by volume as in the UK (DEFRA) for Ireland.
 - This may seem like a small point but enabling SME's to see the differences and make the comparisons will greatly speed decision making (and save us doing it).
- **Barrierless tolling** for HDVs is implementable now with majority of HDVs tagged and only the toll operators standing in the way.
- **Clear longer dimension licensing and routing** from the RSA in combination with TII can lead to optimum locations for new warehousing rather than developer led locations as now.
- **Dedicated parking** for mobile warehouses in towns and cities; reduce batch of one losses and facilitate reverse logistics in the circular economy whilst reviving urban centres.
- **Grant HVO an excise holiday now** to kickstart demand in trucks from whence refinery and fuelling investments can support sustainable aviation fuels in due course.

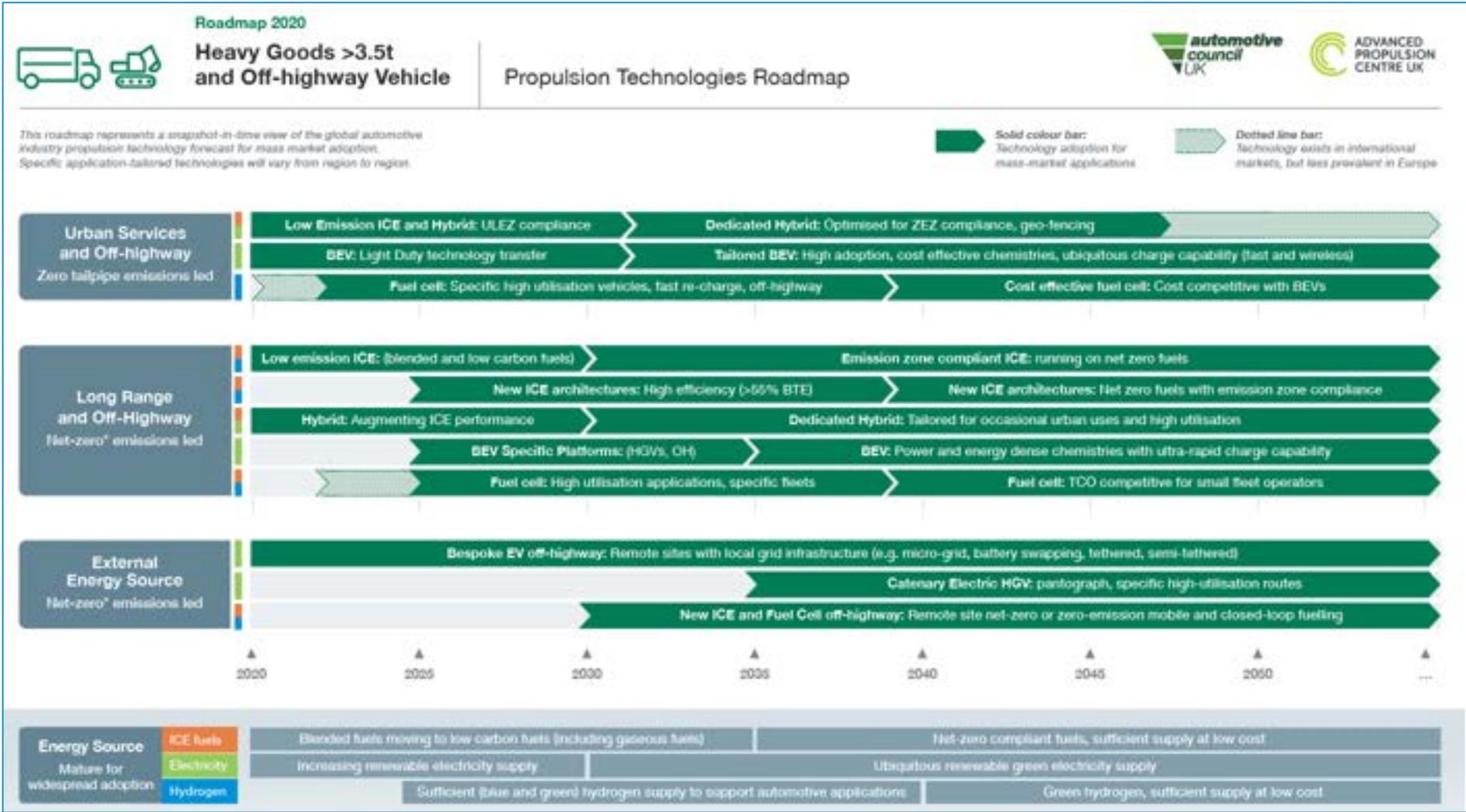
10. Additional research topics for debate

- With limited rail lines **is it better to shift passenger car traffic to rail, or road freight to rail?** The answers will be route specific amidst new direct routing to Europe.
- **Where do the opportunities for cross sectoral collaboration lie?** Timber and fertiliser is a well known back haulage opportunity where are the others.
- With a projected population increase of 20-40% by 2050 and a net-zero target, **how does the circular economy need to grow in a manner that maximises vehicle load factors** whilst reducing use of vans for last mile suburban and rural deliveries.

Appendix – RHD HDV roadmap courtesy ZEMO - <https://www.zemo.org.uk/>

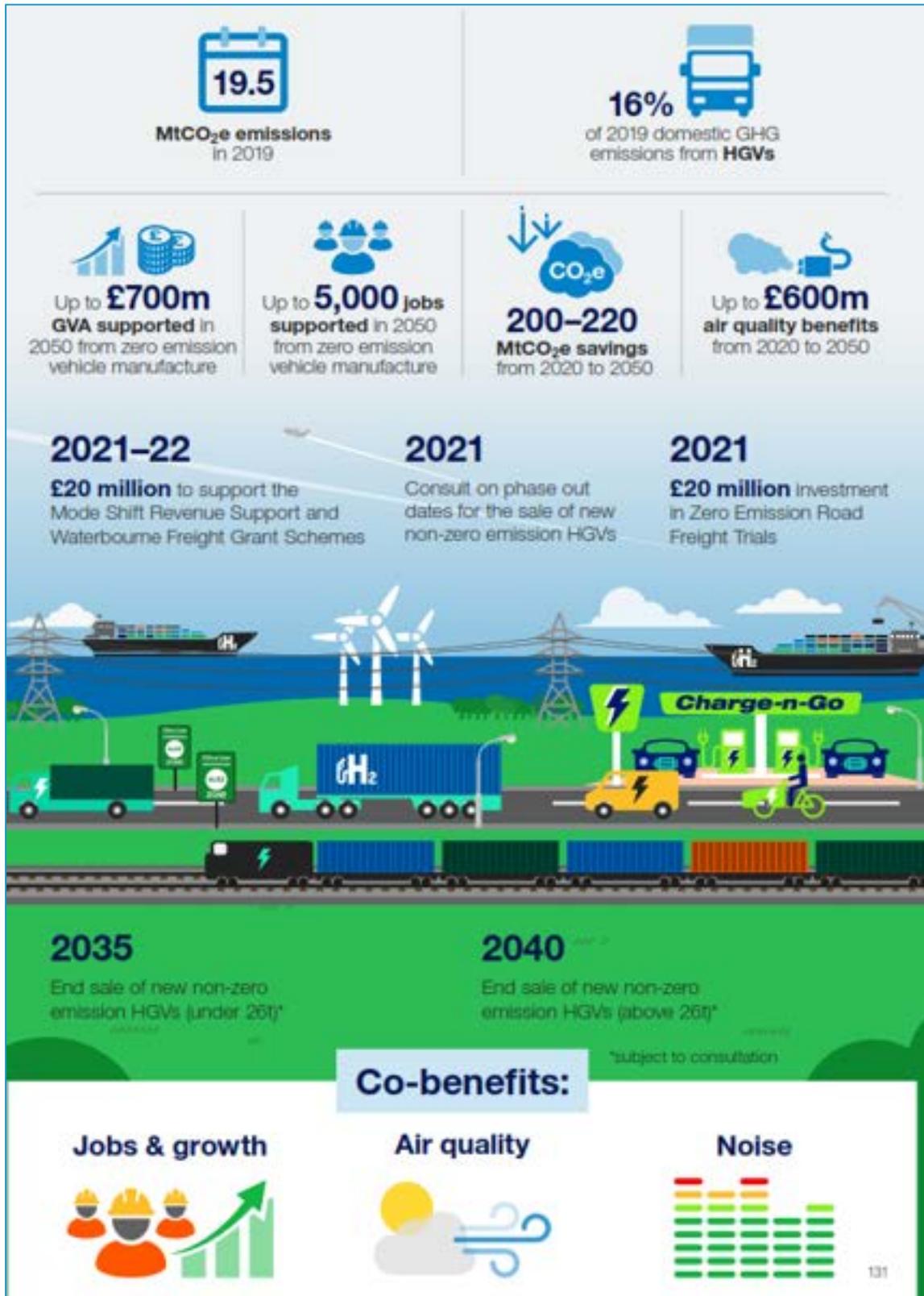
Whilst the UK has left the EU and there's a natural inclination to look further east to our EU partners, the UK nonetheless remains the largest Right Hand Drive (RHD) market in our neighbourhood. Our supply of technology and vehicles will inevitably follow theirs, whether we like it or not and until we switch to LHD.

With this in mind we reproduce below the HDV roadmap from ZEMO's presentation at SEAI's public sector conference on 3rd June last (the full presentation and video is available via <https://energylink.seai.ie/document/view/1973> (Government email required to register and access);



Appendix –UK proposals for zero emissions logistics

Published 14th July 2021 this graphic shows direction of travel from our RHD neighbour – https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf



Appendix – SEAI 2020 Provisional Energy Balance

<https://www.seai.ie/data-and-insights/seai-statistics/key-publications/national-energy-balance/>

Quoting directly from the Key points from the 2020 Provisional Energy Balance:

CO₂ emissions from energy use fell 12.4% in 2020, a reduction of 4.6 million tonnes of CO₂. This means that CO₂ emissions from fossil fuels used for energy were the lowest since 1993 and were 31% below 2005 levels. This marks the biggest annual reduction in CO₂ emissions since 2009. Oil products used for transport accounted for the largest reduction in energy use, attributable to the public health travel restrictions.

The figures for 2020 show:

- Overall energy use fell by 9.2%, relative to an economic contraction of 5.4% (Modified Domestic Demand).
- Energy related CO₂ emissions fell by 12.4% or 4.6 million tonnes of CO₂. Almost half of this reduction, 2.1 million tonnes of CO₂, was from international aviation.
- Oil use decreased by 16.5% in 2020, equivalent to 3.6 million tonnes of CO₂. **This was the largest annual reduction in oil use ever.**
 - Almost all the reduction in oil use was in transport, this was because of restrictions and disruptions during the public health emergency. **Total transport energy use was down 25.9%**
- The largest reduction in oil products was in jet kerosene, which was down 64.4% (2.1 million tonnes of CO₂), followed by road diesel, down 13.6% (1.3 million tonnes of CO₂), and petrol, down 24.1% (0.6 million tonnes of CO₂).
- Peat use fell by 33.6% (1.0 million tonnes of CO₂) mostly through a halving of peat used for electricity generation.
- Energy from renewable sources grew by 8.5% in 2020.
- 42.0% of electricity generated was from renewable sources in 2020, 36.1% was generated from wind.
- The CO₂ intensity of electricity fell by 8.8% to a new low of 296 gCO₂/kWh. This is less than a third what it was in 1990, due to less use of coal, oil and peat, and more renewables and high efficiency gas turbines.
- For Ireland's 2020 EU renewable energy targets, **the share of renewable energy in transport (RES-T) was 9.9%, compared to the EU target of 10%**. The normalised share^[1] of renewable electricity (RES-E) in 2020 was 38.9%.

The full 2020 National Energy Balance will be finalised and published in October 2021.

Appendix - 'Clean' vs 'Green'

DoT documents often lead with "cleaner" when the challenge to 2030 and 2050 is to be as near zero CO₂ emissions as possible ("greener"?); with extreme weather events impacting ever more strongly we must aim for net zero in emissions of greenhouse gases and CO₂e first and foremost.

If the challenge is to be cleaner, why has the Government let dirty Euro I-V trucks be imported⁸ second hand from the UK as they shed their dirtier vehicles to avoid low emission/ clean air zone charges?

Assuming the Government intend to prioritise reducing greenhouse gas emissions – of which CO₂ is by far the largest by volume – key points need to be communicated;

- Portraying HDV freight as dirty or unclean does not help the climate action discussion.
- One highly regulated and serviced truck replaces over 10 relatively unregulated vans
- Euro VI (used by HDVs) was never implicated in the diesel gate scandal – source ICCT →

If there are issues with the industry in terms of its operational air quality emissions, these can be addressed annually via existing industry programmes.

HSA & RSA both recognise these programmes as industry leading initiatives.

To not explain the improvements in Euro VI/6d over older Euro standards encourages uninformed public debate and additional costs on the sector for no obvious return in emissions reduction or competitiveness.

Notes:

- Air quality emissions are regulated by Euro emissions standards – maximums in PPM per kWh
- HDV are and were tested differently to LDV hence the roman numerals VI vs 6
- HDVs have more space for emissions control equipment, leading to higher levels of compliance
- There's no CO₂ in EURO standards, this is a surprise to many but has been the case since start.

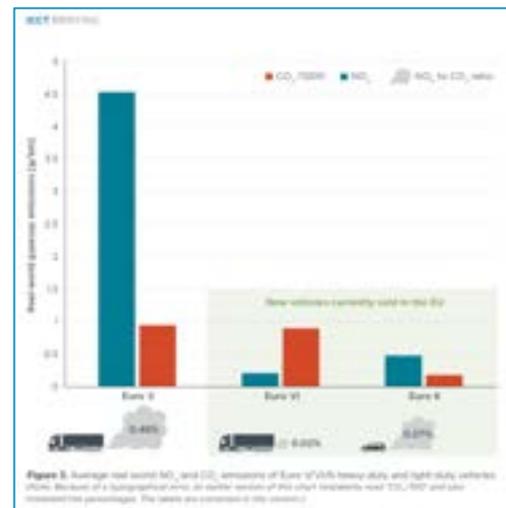


Figure 7 ICCT real world testing of Euro VI vs Euro 6 - 2016 post dieselgate

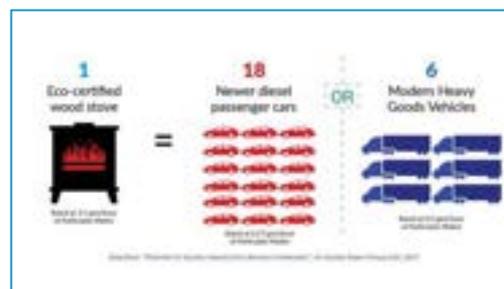
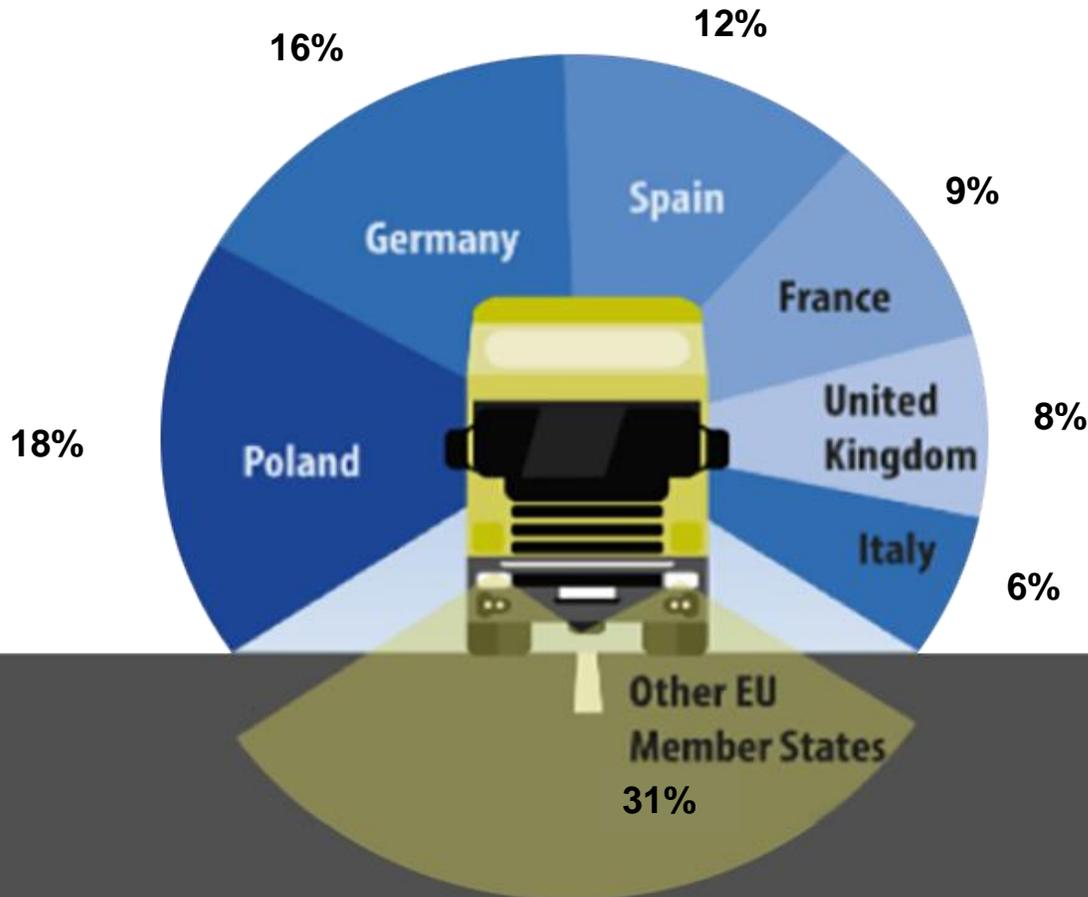


Figure 8 Eco stoves vs diesel cars and trucks

⁸ Source <https://stats.beepbeep.ie/heavy-commercial-vehicles> June 2021

Biggest part of goods transportation in UK & EU-27 is on national level

Road freight transport in the UK/EU

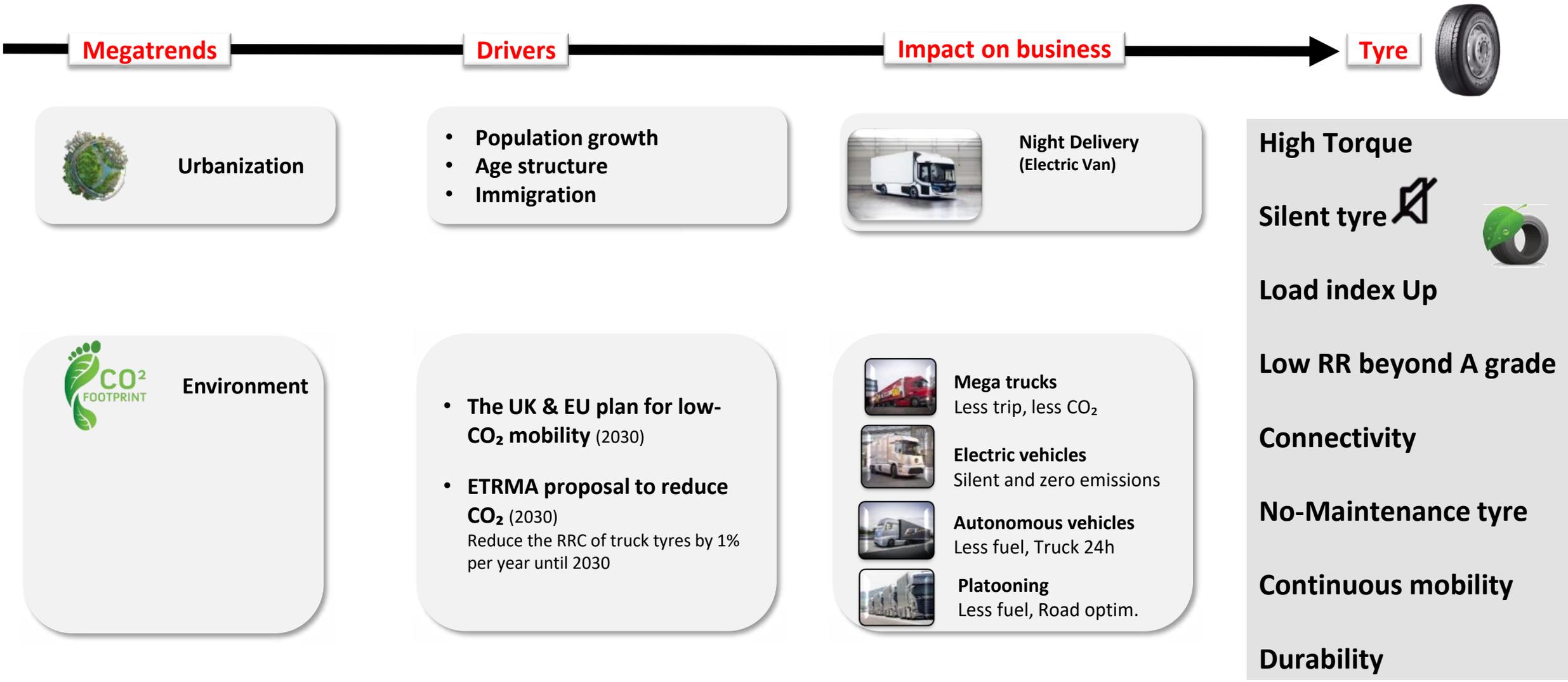


4.5 %
was the increase of the European road freight transport between 2018 and 2019

- International haulage has grown. However, the biggest part of goods transportation in EU-28 is on national level.
- Poland and Germany continued at the top of European road transport in 2019, in terms of kilometers covered.

DURAVIS R002

EVOLUTION TRENDS IN COMMERCIAL VEHICLES





VECTO is a simulation tool that allows you to calculate and determine the fuel consumption, carbon dioxide emissions and energy consumption of newly manufactured heavy vehicles before registering, selling or allowing them to be sold in the European Union. VECTO aims to make it possible to objectively compare truck performance and encourage EU models that use less fuel.

■ VECTO - Background

BACKGROUND

Green House Gas emissions in EU

- Within the EU-28, **Transport** is responsible for around one third of GHG emissions.
- **Road transportation** accounts for the vast majority of all transport emissions:
 - **Cars and light duty vehicles (vans) ≈ 70%**
→ Vehicle CO₂ emission is **already regulated**, with limits & penalties for non-compliance.
 - **Heavy duty trucks, buses and coaches ≈ 30%**
→ Vehicle CO₂ emission is **not regulated so far**.

EU COM ACTIVITY

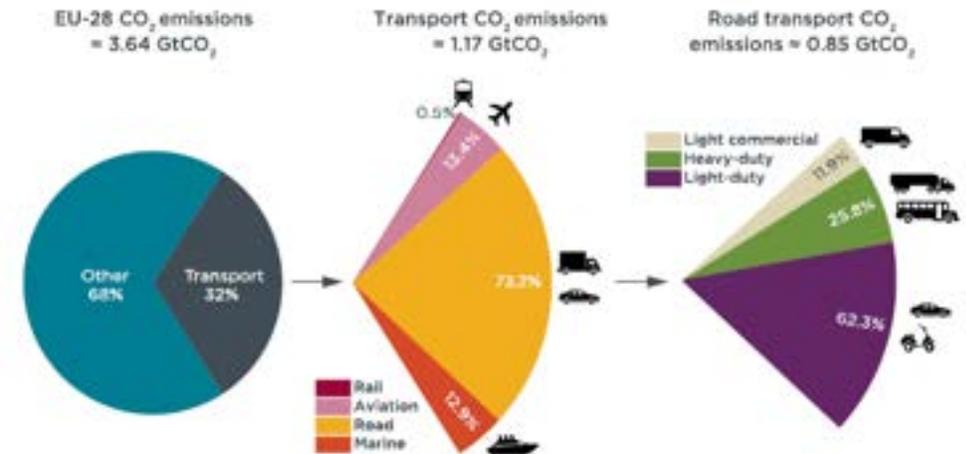
- In May 2014 the Commission adopted a Communication entitled "Strategy for reducing HGV fuel consumption and CO₂ emissions" COM(2014)285.
- Given the average lifetime of a truck of about 10 years, vehicles sold in 2020 will still be on European roads in 2030 → Objective is to curb emissions well before 2030.
- EU COM finalized Reg. 2017/2400 to deal with HDVs' CO₂ emission certification.
- EU Parliament & Council Reg 2019/1242 set CO₂ performance standards (June 20th, 2019)

→ **Vehicle Energy consumption Calculation Tool (VECTO)**



... SIMULATION TOOL TO CALCULATE BOTH: FUEL CONSUMPTION AND CO₂ EMISSION, FROM THE WHOLE VEHICLE

- VECTO has been developed by Commission (Joint Research Center supported by the Technical University of Graz)
- Stakeholders have been involved and provided key inputs to develop and validate the tool





■ VECTO Overview

From 1st July 2020:

⇒ Based on the reference period, for each subsequent reporting period, and for each manufacturer, the EU Com. determine **the av. CO₂ emission in g/tkm** for the preceding reporting period.

From 1st July 2026

⇒ Based on the CO₂ emission reduction target and details of each manuf. (CO₂ reference, vehicle share in each category) EU Com will specify **the CO₂ target by manuf. that need to be respected.**

Credit & Debit for OEMs

To follow if manuf. respects its specific CO₂ emission objective

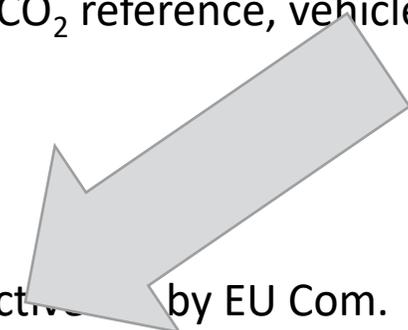
⇒ From 2019 to 2024: credit can be acquired if OEM is below the CO₂ objective by EU Com.

⇒ From 2025 to 2029: if above the target => debt of 4250 EUR/gCO₂/tkm

⇒ From 2030 onward: if above the target => debt of 6800 EUR/gCO₂/tkm

NEXT:

VECTO extension to Buses, Vans & Trailers (2022)





BRIDGESTONE

U-AP002

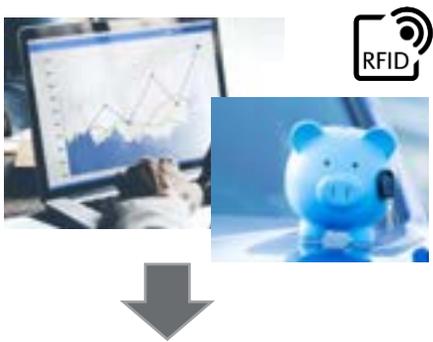


U-AP 002 - Rationales

LEVERAGE FROM CURRENT GAPS TO DEVELOP A NEW HERO-PRODUCT IN CITY-BUS APPLICATION

BEST PERFORMANCE FOR SOLUTION BUSINESS (PPK)

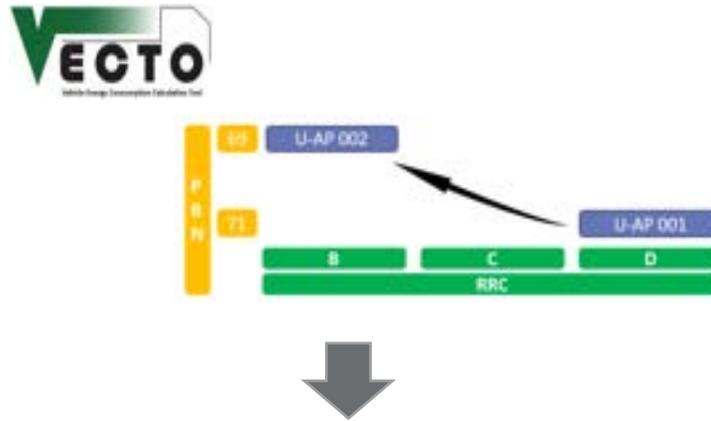
U-AP is designed specifically for city bus fleets (PPK contracts).



RFID allows tracking for Solution Business Total Tyre Care, including PCT/Retread UAP2

MAXIMIZING PRESENCE IN OEMS & TENDER CONTRACTS

City Bus & OEMs challenge tyres labelling to reach higher sustainability & efficiency.



New U-AP2 comes with 2 classes RRC improvement (-3.4% fuel/CO2) and -2dB on noise for better sustainable mobility and higher competitiveness for tenders. 360° best in class in labelling vs. Competitors

SUITABLE FOR ALL KINDS OF POWERTRAINS

Electric and Hybrid bus markets are growing and tires must be designed to fulfill new requirements



① *Higher load capacity to be suitable with 8 tons in steer axle*



② *Advanced technologies applied for Low Rolling Resistance & noise reduction*



③ *New Pattern Design (closed) for better behavior against higher torque (positive and negative, regenerative braking)*



U-AP 002 – THE NEW DEDICATED TYRE TO CITY BUS

Groundbreaking. Outstanding in Sustainability. Improved Wear Life.



SUSTAINABLE URBAN MOBILITY

CO2 REDUCTION THANKS TO LOWER RRC*
NOISE DECREASE TO 69dB*
MULTIPLE LIVES

HIGH LOAD CAPACITY

SUITABLE WITH 8 TONNS STEER AXLE

REINFORCED SIDEWALL

THICK SIDEWALL PROTECTION

WINTER READY

3PMSF AND M+S

RFID

UNIQUE TYRE IDENTIFICATOR EQUIPPED

* Based on official qualification tests which was carried out in Bridgestone facilities vs predecessor U-AP 001 Size 275/70 R22.5, all position
Reduction to B Grade for RRC vs U-AP 001 (D Grade). Reduction to 69dB vs U-AP 001 (71dB).

**Based on internal field test (MTF801) carried out vs predecessor U-AP 001 Size 275/70 R22.5, all position.

NB : picture is not yet final. Internal usage only



The Chartered Institute of Logistics and Transport Ireland

Submission to the Department of Transport for the Public Consultation on the Ten-year Strategy for the Haulage Sector

28 June 2021

The Chartered Institute of Logistics and Transport (CILT) Ireland welcomes the Department of Transport commissioning of public consultation of the **Ten-year Strategy for the Haulage Sector**. We complement the Department of Transport on their achievements to date and support the department with their continued good work and initiatives in modernising and promoting a low-carbon transition in the Irish haulage sector.

The Department of Transport sought views on the development of a strategy for the haulage sector and implement a 10-year strategy for the sector to improve efficiencies, standards, and helping the sector move to a low-carbon future. A total of 26 questions in 8 key areas have been raised in the *Ten-year Strategy for the Haulage Sector First Consultation Document*¹.

In the following sections, we would like to put forward some key points to address the issues related to Environmental and Decarbonisation, Labour Market and Skills, Intermodal Transport, Road Safety, and COVID-19.

¹ The full document is available at <https://www.gov.ie/en/consultation/0dfc7-public-consultation-on-ten-year-strategy-for-the-haulage-sector/>

1. Environmental/Decarbonisation

The Department of Transport is seeking views on how to decarbonise the haulage sector, with questions being raised regarding the uptake of alternatively-fuelled HGVs, urban consolidation centres, and collaborations within the sector. We address the questions in the following sections.

1.1 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?

The road haulage sector, including both light and heavy goods vehicles, accounts for over 27% of total transport emissions in Ireland. According to SEAI², among all road freight activities, delivery of goods to wholesalers and retail outlets was the largest source of freight energy demand in Ireland, followed by import and export of goods, as measured by tonne-kilometres.

The Department of Transport indicated in the strategy document that the '*carbon emissions from heavy goods vehicles need to be reduced by 15% by 2025, and 30% by 2030 relative to average emissions over the period from July 2019 to June 2020*'.

To decarbonise road freight transport, researchers have been working on decoupling the link of economic growth to logistics emissions through operational efficiency and technology. **However, much of the logistics clean vehicle technology is still in its infancy** such as electric vehicles for long-haul freight transport, bio-methane gas-run vehicles, and hydrogen.

A recent study in the US³ compares the potential cost saving of electric trucks with diesel trucks; the finding suggests that an electric truck with a 375-mile range can offer about 13% lower total cost of ownership per mile than a diesel truck, about 3-year payback, and net present savings of about US\$200,000 over a 15-year lifetime.

² <https://www.seai.ie/data-and-insights/seai-statistics/key-statistics/transport/s>

³ <https://eta-publications.lbl.gov/publications/why-regional-and-long-haul-trucks-are>

Again, almost any of these clean technologies will require significant upfront investment costs for both vehicles and infrastructure for charging or fuelling. Otherwise, the scalability won't be achieved to harness the true potential of carbon-friendly vehicles.

CILT welcomes and complements the Department's policy support towards decarbonising the Irish road haulage sector in the past two years. Following the *Low Emissions Vehicle Toll Incentive Scheme*, the government has recently announced the *Alternatively-Fuelled Heavy Duty Vehicle Purchase Grant Scheme* for road freight operators. Considering Ireland's almost 40,000 heavy goods vehicles are diesel-fuelled and 45% of which are over ten years old, this has the potential to stimulate uptake of cleaner vehicles.

There are a few key actions and discussion points required for the haulage sector in Ireland, with the following measures generated from CILT's recent policy study⁴:

- **Clean vehicle technologies** such as battery-electric vehicles, bio-gas, or hydrogen-fuelled vehicles demonstrate promising projections to mitigate carbon emissions. Yet these technologies for long-haul freight transport still need further maturing and scalability to offer at a commercially viable price for road freight operators.
- **Sustainable urban freight measures** such as 'cargo bikes' have been considered with a great positive impact on the last-mile delivery. However, a proper bikeway network design is needed in urban areas to ensure road safety for pedestrians and cyclists in our cities.
- **Reviving rail freight** in Ireland could potentially shift some of the road freight volumes to the more environmental-friendly rail mode. Paradoxically, rail freight in Ireland is facing great challenges to grow and has dropped to one of the lowest levels in terms of modal share among other EU states. The cost-efficiency and viability of the modal shift in the Irish context are still debatable.

⁴ Transport Policy Review, CILT Ireland, 2021. Available at - <https://www.cilt.ie/Portals/0/adam/FAQ%20with%20Categories/xmCCiwUjd0-4WcgbVei9cQ/DocumentLink/CILT-Ireland-Policy-Research-Report-ONLINE.pdf>

Factors such as infrastructure investment, freight quantity, density, and distance travelled need to be considered. (see also in **section 3.2**).

- **Soft policy measures** towards green technology adoption and sustainability education should include wider audiences, thus encouraging positive behavioural change and foster collaboration among actors along the supply chain.

1.2 Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

Urban consolidation centres (UCCs) as a mainstream concept has been prominently advocated and debated. UCCs usually locate in the sub-urban areas or the outskirts of the city centre, in order to reduce HGVs trip to/from the city centre (see also in **section 3.1** urban logistics)

By definition, UCCs can fulfil many functions including warehousing, transshipment and consolidation of loads. At the terminal, shipments destined for delivery are sorted into routes and dispatched with a single truck serving all premises along one route. The trucks also pick up outbound shipments and return them to the terminal where they are sorted for collection. Such centres are designed to meet the requirements of an urban freight transport system using advanced information systems.

As a concept, UCCs could solve several issues and result in environmental and social benefits from more efficient and less intrusive transport operations among other benefits for multiple players and actors along the supply chain.

However, the reality of UCC is more challenging due to high-set up costs, operational complexities from different storage and handling requirements among products and cargo owners, failure to attract a sufficient number of clients, among other challenges that are well documents in extant literature.

A review of UCC⁵ shows that some are initiated by private entities such as owners or developers of shopping malls, or air cargo terminal operators and construction contractors. However, we also have UCCs that are designed to serve parts or the entirety of urban areas where there are narrow streets, historic layouts and where possibly there is a lack of loading and unloading bays in urban areas. Such UCCs are often initiated by local authorities and they may receive various forms of public support (e.g. financial, direct or indirect regulatory support).

The above research study also shows that UCCs can be initiated by private entities or local authorities. A key concern is how to make the centre economically self-sufficient after the necessary initial installment. A review of the successful cases of UCCs such as the case in city of Gothenburg in Sweden shows that any supporting policies for UCC should be considered together with other urban freight transport policies established by the local authority and that retailers should be included in the planning to express the requirements they need.

For the potential and feasibility of UCCs in Ireland, we are of the view that a **cross-sectional multi-stakeholder dialogue** needs to be carried out to understand the need and demand for such initiatives. Furthermore, experts and researchers in logistics and supply chain, and transport planning are required to explore the feasibility of establishing UCCs and propose business models under different scenarios.

1.3 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.

The implementation of various solutions such as the abovementioned UCCs, or solutions to encourage the uptake of cleaner vehicles will need the cooperation or collaboration of multiple stakeholders.

⁵ See more in 'Supporting urban consolidation centres with urban freight transport policies: a comparative study of Scotland and Sweden', <https://www.tandfonline.com/doi/full/10.1080/13675567.2019.1679743?needAccess=true>

A research study⁶ in Sweden has suggested a few options for stakeholder engagement and partnerships in the logistics industry:

- **Freight partnerships** is a long-term partnership between freight stakeholders, that on a formal or informal basis meet regularly to seek solutions to problems and discuss concerns. Most partnerships do not receive any funding, while in other cases some partnerships have received funding through a project.
- **Business-led stakeholder engagement**, also known as Business Improvement Districts (BID) type organisations. E.g. BIDs in Central London.
- The private sector '**Living lab**' approach refers to a local experimental project of a participatory nature in a real-life setting with multiple stakeholders involved. Usually for a small-scale project.



Figure 1 Steps to set up a freight partnership

Source: Browne et al., 2019, p.261.

⁶ See more in 'Stakeholder Engagement and Partnerships for Improved Urban Logistics' by Browne, M., Btermo, A. and Linholm, M., 2019. In Urban logistics. Management, policy and innovation in a rapidly changing environment. Kogan Page Limited London.

1.4 Additional note - Decarbonisation Awareness in the Irish Transport Sector

Transport carbon emissions in Ireland have been steadily increasing over the past ten years, in contrast to other countries in Europe. There have been policy measures proposed by the Irish government to support the transport industry in reducing their carbon emissions, but these interventions have yet to have any significant effect on emissions.

Research on the decarbonisation measures has focused on analysing the potential impact and feasibility of policy implementation from the public stakeholders' perspective, but there has been little work exploring the Irish industry stakeholders' subjective experiences of the decarbonisation measures.

In 2021, at CILT we are conducting a research study entitled '*Towards a Decarbonisation Roadmap for Road Freight in Ireland: A Gap Analysis of Policy Agenda and Industry Perception*'. In this study, we aim to pinpoint and analyse the 'policy-implementation' gap between the government agenda and the industry's perception of freight transport decarbonisation.

To capture the transport industry's perception and awareness of low-carbon transport, an online questionnaire was conducted to canvass the attitude and concerns of road freight operators and logistics service providers in Ireland.

Currently, the primary data through survey has been collected and we are in the process to finalise the result in the coming weeks. We will share the study finding with the Department once we completed the study.

We hope the outcome of this study could help policymakers in the Irish transport sector to gain a fuller understanding of how logistics companies in Ireland perceive the current policy and the challenges facing the logistics industry to the low-carbon transition. Focusing on the industry's perspective can help policy research to develop robust policy interventions with effective measures to bridge the 'policy-implementation' gap, and potentially informing future policy objectives.

2. Labour Market/Skills

The shortage of manpower and aging labour force in the haulage sector, as well as challenges to attract and retain talent have been raised in the Department's strategy document.

We are of the view that a clear and promising career development path needs to be established and fostered through both academic and vocational training, in order to attract young talent and upskill the workforce in the logistics and haulage industry.

CILT is a professional body in Ireland for people in the logistics, transport and supply chain industry, the institute's key remit is to promote professionalism and enhance standards in the logistics, transport and supply chain sector through the provision of education and services.

In collaboration with Skillnet Ireland, *CILT Skillnet* is a learning network for enterprises of all sizes within the transport, logistics and supply chain management sectors. CILT Skillnet offers subsidised industry-led training courses to businesses in Ireland. We also endeavour to offer a quality non-physical presence engagement via digital platforms, especially during the COVID-19 period.

In this section, we address some of the key questions raised by the Department, and some additional notes also provided based on CILT's policy study.

2.1 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.

The haulage sector has long been perceived as a male-dominant industry, and the working conditions are also under scrutiny. A research done by Ji-Hyland and Allen

(2020)⁷ at TU Dublin has identified several factors that contribute to the haulage driver shortage through surveying professional drivers in Ireland. Factors such as remuneration and salaries, driver wellbeing in terms of physical and mental health, little support provided for training and education are urgently need to be addressed.

For haulage operation, policy should be put forward by the government to optimise drivers working/driving hours. For example, potentially to reduce day time operation, and improve night-time operation, especially night operations at Ports to reduce congestion in motorway and urban areas during day time.

For training and education, we would like to propose conducting a gap analysis study to map out the current manpower demand (such as job, roles, and skill required) and education and training supply (higher education and vocational training) in the Irish logistics and road haulage sector, and thus to develop a systematic and forward-looking training framework based on international best practice to fulfil the training need in Ireland. Such top-down and bottom-up investigation would help the government to gain visibility of the current labour market in the wider logistics and freight transport sector.

2.2 How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?

The logistics and supply chain industry in Ireland did not receive much attention from the media until the disruption caused by Brexit, COVID-19 lockdown, and more recently Suez Canal blockage.

We simply cannot stress more the importance of our haulage industry, and other logistics professionals to keep our normal life running during such a difficult time.

• ⁷ Source: Ji-Hyland, C. and Allen, D., 2020. What do professional drivers think about their profession? An examination of factors contributing to the driver shortage. *International Journal of Logistics Research and Applications*, pp.1-16. <https://doi.org/10.1080/13675567.2020.1821623>

Whereas our logistics industry in Ireland has a long-overdue need to re-skilling our aging workforce in some areas and bring up a modern image to attract more talent. Policy support is greatly needed to re-skill and up-skill our transport and logistics community.

We are of the view that improving communications between the logistics industry and the general public is critical to modernise the image of the industry. Professional bodies (such as CILT) and industry associations (such as FTAI, IRHA) should generate social and communication content and disseminate it through online media (e.g. quarterly bulletins, monthly webinars) and networking events (e.g. bi-annual workshops).

2.3 How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?

In order to re-skill and up-skill our transport and logistics community, we propose some measures and suggestions as follows:

A clear career development path for logistics & supply chain professionals needs to be developed and fostered through academic and vocational training, to attract young talent and upskill the workforce in the logistics and haulage industry. Training should be provided at all stages to improve the workforce's employability, such as traineeships and apprenticeships, degree level, graduate level, as well as continuous and refresher training for the experienced workforce.

A sustainability training module specifically for the logistics and supply chain should be developed in line with the industry, national, and EU requirements, and incorporate into the current training modules at different levels. Such training courses could improve the transport industry's awareness and foster a long-term sustainability vision to align with the Irish transport sector's decarbonisation agenda. The training could also foster sustainability professionals for the transport sector in Ireland.

A training 'umbrella' body could be established for the logistics and supply chain industry in Ireland (such as National Institute for Transport & Logistics,

<http://www.nitl.ie/>) to co-coordinates and oversees the provision by, or on behalf of, the Institute of educational programmes leading to professional qualifications.

Last but not least, a gap analysis should be conducted to map out the current manpower demand (such as job, roles and skill required) and education and training supply (higher education and vocational training) in the Irish logistics and road haulage sector, thus helping to develop a systematic and forward-looking training framework based on international best practice to fulfil the training need in Ireland.

2.4 Additional Note - Training needed for Freight Transport Professionals

In January 2021, we surveyed our CILT members and asked what education programmes and training courses are required by members, some feedback is listed as follows:

- ADR (Driver training);
- Transport of Dangerous Goods;
- Transport management & compliance;
- Port - Terminal Operations Management, Warehouse Management;
- Health and Safety;
- Train the trainers (e.g. Training for supply chain manager, Supervisor management);
- Procurement Education at different levels, how to win new business when dealing with e-tenders government public sector commercial opportunities;
- Communication skills particularly in the area of digital communications.

Apart from training requests directly related to HGV operations (such as Driver CPC, ADR training), we also observed demand for training related to supply chain management, such as transport management & compliance, warehouse management, procurement, as well as training for supply chain managers.

Training for soft skills such as communication, e-tendering via digital platforms is also critical to logistics professionals, especially during the challenging COVID-19 lockdown.

3. Intermodal Freight Transport

For intermodal transport, the Department has raised questions concerning key topics such as urban logistics and rail freight. We will address some of the questions in this section.

3.1 Urban Logistics

Is freight transport being taken into account sufficiently within Ireland's integrated transport planning system, particularly the various transport strategies for urban areas?

Current urban logistics practices in Ireland⁸

Road transport is the dominant mode of moving freight in Ireland. Increasing urban freight distribution and road-intensive logistics activities in the city have led to a series of environmental and social issues in urban areas, such as increasing greenhouse gas emissions, noise, air pollution, traffic congestion, infrastructure deterioration, historical urban area preservation, the quality and safety of residents in urban areas. Sustainable freight transport in the urban areas will make a positive impact on the environmental, social, and economic sustainability of the communities they serve.

We acknowledge that innovative urban freight trials and initiatives have been carried out by local authorities (such as the Dublin City Council through the Smart Dublin project) and courier companies (such as An Post, DPD, UPS). The measures such as eco-hubs, cargo bikes could potentially reduce delivery vehicles in the city centre.

We can summarise a few key observations of the existing urban logistics measures in Ireland as follows:

- Most of the current initiatives focus on retail logistics activities, such as mail and parcel deliveries. Other urban logistics activities such as construction logistics, reverse logistics, and other service-related freight transport in the urban areas also need to be considered and tackled.

⁸Some of the findings in this section are also presented on the Haulage Strategy Webinar hosted by the Department of Transport on 16 Jun 2021. Presentation is available at - <https://www.gov.ie/ga/foilsuichan/3d568-ten-year-strategy-for-the-haulage-sector/>

- Most of the initiatives focus on last-mile deliveries by light good vehicles or cargo bikes in the city and are of small-scale implementation, possibly with the exception of national courier and international courier companies.
- Most of the on-going initiatives are industry-led initiatives of a single company with limited or mediated collaboration. Little collaboration has been found among companies or public and private stakeholders.

Based on these observations, we identify some gaps in the current practice as well as some opportunities that lies ahead:

- Logistics operations, especially HGV operations in urban areas, are facing significant challenges from the city, such as limited parking bays, tight loading/unloading times, and expensive operating costs.
- There is a need to reduce trips of HGVs to/from the city as the current initiatives mostly focus on last-mile deliveries and LGVs.
- An opportunity to achieve a reduction of HGVs in urban areas is to consider solutions for the last 50 miles instead of the last mile only. As such, thinking of urban logistics as a system of actors and facilities that goes beyond the last mile.
- To reduce HGVs trip to/from the city centre, a potential solution would be an urban consolidation centre (UCC) in the outskirts of the city. As a concept, UCCs could solve several issues and result in environmental and social benefits from more efficient and less intrusive transport operations among other benefits for multiple players and actors along the supply chain. However, the reality of UCC is more challenging due to high-set up costs, operational complexities from different storage and handling requirements among products and cargo owners, failure to attract a sufficient number of clients, among other challenges that are well documents in extant literature.
- There is an opportunity to learn from the change management process for the replacement of diesel trucks by alternatively-fuelled vehicles from large organisations to guide initiatives and plans of smaller players.

- Lastly, we should also engage consumers, by increasing awareness of such initiative so that the consumers will become mindful of their purchasing behaviour including the shipping service that they choose⁹.

Based the abovementioned urban logistics practices and challenges in urban freight operations, we are of the view that freight transport needs to be taken into account in transport and urban planning.

- **Land-use and transport planning** are critical to achieving the key priorities for transport investment in Ireland as mentioned in the Department's document, namely decarbonisation, urban mobility of people and goods, as well as rural and regional connectivity. Specifically, freight transport in urban areas needs to be taken into consideration in land-use and transport planning.
- **Traffic demand management** is also a key area and there are insufficient skill levels and investments in Ireland.
- **The use of cargo bikes/ tricycles/ e-bikes** requires a proper bicycle network design in urban areas to ensure road safety in the city. Also, clear safety regulations for electric scooters and e-bikes are needed, such as minimum age, training, and insurance. In February 2021, the Government approves the next steps for e-scooter and e-bike legislation in the forthcoming Road Traffic (Miscellaneous Provisions) Bill. This decision will allow for the introduction of appropriate regulations for these types of vehicles.

⁹Read more - 'What's the size of your next-day delivery's carbon footprint?'
<https://www.rte.ie/brainstorm/2021/0323/1205657-next-day-delivery-online-shopping-carbon-footprint-climate-change-logistics/>

3.2 Rail Freight

- *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?*

CILT agrees with the Department that currently 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.

Rail freight in Ireland is facing great challenges to grow and has dropped to one of the lowest levels in terms of modal share among other EU states. Existing rail freight operations include:

- o Container traffic from Ballina to Dublin Port;
- o Pulpwood from Ballina and Westport to Waterford Port;
- o Zinc ore from Tara Mines in Navan to Dublin Port;
- o Ballina and Waterford by XPO (a new twice-weekly rail freight service starts in June 2021)

Rail freight has been widely used as an intermodal mode of transport to improve the connectivity between ports and the city. Reviving rail freight in Ireland could potentially shift some of the road freight volumes to the more environmental-friendly rail mode.

However, the cost-efficiency and viability of the modal shift in the Irish context is still debatable. Factors such as infrastructure investment, freight quantity, density, and distance travelled need to be considered. The distance of **300km** is considered as the threshold of using intermodal transport, this is primarily based on rate difference (longer distance = lower cost per km). However, intermodal is very competitive for high volumes at a short distance, not competitive for low volumes to reach faraway locations.

We would welcome the greater integration of intermodal transport at Ports along the East Coast through the introduction of more rail freight services. We are of the view

that feasibility studies for rail freight should be undertaken to investigate the cost-efficiency and potential environmental impact.

3.3 Additional Note - Port City and Freight Transport

We are of the view that it is high time to re-evaluate and plan for freight transport at Dublin port and surrounded urban areas to reduce the congestion and enhance the efficiency of HGV operations.

Cargo flows and economic performance indicators are very different in the post-Brexit era. The growth in cargo volumes has caused port congestion, particularly at Dublin Port and Rosslare Europort. Improvement in terminal technology and port infrastructure should be made to facilitate the freight transport flow, enhance productivity, and safety improvements for the haulage sector.

Therefore, we would recommend a dedicated study on freight operation in port areas to investigate the port logistics demand and capacity.

The findings from such a study could potentially optimise the current road haulage flow and create opportunities for the haulage sector, such as reduce haulage costs and reduce carbon emissions from the haulage operations.

4. Road Safety

- *What are the road safety priorities in road haulage for the next 10 years? How are these priorities best addressed?*

For HGV road safety, we put forward a few points as below that should be considered in the ten-year strategy:

- **Enhance HGV safety standards in urban areas.** For HGV regulation in urban areas, a good example is London. London has safety standards that targeted the logistics and construction sectors through the HGV Safety Standard Permit Scheme. From 2020, a safety permit to enter or operate in the city is mandatory for heavy goods vehicles of more than 12 tonnes. The permit classifies the safety of an HGV based on how much the driver can see through their windows. Additional vehicle safety technologies will be required from 2024.

London also adopted the Fleet Operator Recognition Scheme (FORS) accreditation for all heavy vehicles contracted in public procurements. FORS is a voluntary accreditation scheme that promotes best practices for commercial vehicles. By 2024, all operators must be certified by the higher FORS accreditation, which includes vehicle safety equipment. (Source: OECD/ITF, 2020, <https://www.itf-oecd.org/sites/default/files/docs/best-practice-urban-road-safety.pdf>).

- **Enhance the safety education and training of drivers, transport managers** through CPC, CPD, ADR trainings.
- **Continue with public awareness and communication campaigns**, including those focused on specific segments for the transport industry and public regarding road safety.

5. COVID-19

5.1 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?

COVID-19 causes supply chain shocks at a company level, a national level, and a global level. During the pandemic, we realise our normal life and business will grind to a halt without an efficient logistics workforce, whereas our logistics industry in Ireland has a long-overdue need to re-skilling our workforce and bring up a modern image. Policy support is greatly needed to re-skill and up-skill our transport and logistics community.

We realised that the lockdown results in spare capacity in parts of our industry (such as school and tourist bus drivers, transport and inventory managers), whilst others (such as lorry/van drivers, transport and inventory managers for essential goods such as PPE) there is a need for re-allocating the logistics workforce capacity to keep the supply lines flow smoothly. The lockdown also disrupted the working hours and conditions for logistics and transport professionals.

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

During the pandemic, CILT (Ireland) formed an online 'National Logistics Forum Resources Database' (<https://www.cilt.ie/lrd-page>) targeting essential logistics and transport workforce (drivers, warehousing, customs and supply chain professionals, SMEs) in Ireland to advertise and share their spare capacity and expertise wherever available. This online forum is open to the public and it is coordinated by the CILT management team.

This forum created a transparent platform to inform and balance the workforce, and it could further enable knowledge transfer by sharing best practices and intangible skillsets to better cope with the supply chain disruptions and improve the resilience of our logistics and transport workforce communities.

The pandemic has tested the logistics industry and we have shown our resilience and strength to support our community in a collaborative approach. The best practice and

solutions we learned from the industry practitioners and our community need to be shared and documented to improve our preparedness for future supply chain shocks, particularly in light of the post-Brexit impact and uncertainties on our supply chains.

6. Conclusion

The CILT welcomes the Department of Transport to conduct this public consultation on the 10-year strategy for the road haulage sector.

By making this submission, we are interested in engaging further with the Department in relation to the future development of the haulage strategy, thus helping the Irish transport operators and logistics professionals to tap the opportunity and growth within and beyond the sector.

Submitted on behalf of the Chartered Institute of Logistics and Transport in Ireland by,

CILT Policy Committee

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For more information, please visit: <https://www.cilt.ie/Policy>

28 June 2021

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John Henry, Membership Committee Chair

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Mick has for the last three years been the CEO of the Chartered Institute of Logistics and Transport (CILT). Additionally, prior to joining CILT, Mick spent 24 years as a member of the Defence Forces serving in a variety of roles both at home and overseas.

Background

Circle K Ireland welcome the opportunity to respond to the recent consultation on Ten-year strategy for the Haulage sector.

As Irelands largest importer and distributor of oil products, Circle K is proud to play our part in the contribution and the achievement of Irelands de-carbonisation goals. As a company we have robust plans to de-carbonize our business, so we are particularly keen to be a part of the future decarbonisation of transport in the road haulage sector, in our role as the largest importer of road transport fuels used in this sector.

In Ireland and in other countries where Circle K operate (most notably the Nordics and Scandinavia), Circle K have extensive experience in introducing BIO Fuels into traditional fossil based diesel and gasoline fuels, but are also at the forefront in the introduction of other low carbon solutions, such as HVO as a replacement fuel for traditional diesel powered vehicles, as well as Compressed Natural Gas (CNG) for relevant vehicles. Since 2019 Circle K in Ireland has been the only retail forecourt operator to offer CNG to the haulage sector, and in the coming weeks we will open our fourth site supplying this solution.

In reviewing the consultation, we would like to address the questions relating to environmental and decarbonisation.

- **What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?**

In looking at the adoption of less polluting HGV's, Circle K believe that two key elements need to be addressed; nationwide infrastructure, and benefits and tax incentives to encourage end users to adopt the new technologies.

Over a 10 year time horizon, and looking at HGV requirements, the two main options for end users would appear to be vehicles powered by natural gas, and also by bio fuels such as HVO 100, and traditional fuels blended with higher percentage of BIO fuels.

The transition to a lower carbon fleet of HGV's needs to be open to the use of all options that are presented, but must also be cognisant of the commercial realities faced by the market participants, and the speed required in the de-carbonisation process. As such Circle K believes that the options available now to the market, such as traditional fuels blended with higher levels of BIOfuels, must continue to be used and encouraged.

BIOfuels

In looking at BIOfuels such as used cooking oils and HVO, incentives must be given that allow retailers to pass through reductions in areas such as duty and other relevant taxes. Precedent has already been made (and welcomed) by the acknowledgement through the NORA levy, of a reduction to the contribution based on the volume of BIO fuels placed onto the market, a similar reduction must be considered for govt. duty on the supply of blended diesel and pure bio diesel products.

The further adoption of Bio fuels that are compatible with the existing fleet of HGV's in Ireland will accelerate the transition away from carbon based fuels, whilst optimising and utilising the current vehicles in use in Ireland, minimising the need for capital investment in new fleet.

From an importers and distributors perspective, capital expenditure required to upgrade fuel storage and infrastructure to accommodate these new BIOfuels should qualify for grants such as the accelerated capital allowance already in place.

CNG and Alternative Fuels

Circle K in Ireland is at the forefront of the introduction and adoption of alternative transport fuels.

Our Compressed Natural Gas (CNG) sites in Dublin, Tipperary and Limerick remain the only publicly available retail sites for the supply of CNG. Circle K have partnered with Gas Networks Ireland in the delivery of these sites.

Being an early adopter to this technology has allowed us to address several challenges in their development.

From a customer point of view, it is critical that CNG vehicles continue to be promoted. Circle K acknowledge that government funds continue to be available to assist hauliers in the purchase of these vehicles, continued and growing support will consolidate CNG as a future option for end users, and in doing so encourage the further roll out of infrastructure to meet this demand. Circle K's learnings from our customers who have adopted this technology, is that this solution has been an overwhelming success in the reduction of their costs, as well as de-carbonising their transport fleet with no interruption to the operational requirements.

From a supplier perspective, the development of onsite infrastructure is a significant investment and commitment in terms of finance towards the long-term adoption of the technology. Further investment will require two key elements. The first is to develop

market scale in the use of CNG, which can be addressed by the commitment to grants towards the vehicles themselves. The second relates to surety around duty on the product, as well as development of an appropriate regulated regime around the network pricing towards the product, and the third relates to grants, incentives and further support from government bodies and regulators towards the building and development of the infrastructure.

From a product cost perspective Circle K welcomed the discounted duty rate and the adoption of this rate out until 2022. Whilst this has assisted in the adoption by hauliers of CNG vehicles, we are still in the very early stages of the market's adoption. The reduced duty has meant that even in times where commodity markets have converged, the relative cost of CNG to the diesel alternative has remained competitive. The early removal of this discount will no doubt slow down the adoption of CNG vehicles. Circle K believe that the government should send a clear signal to the transport sector by continuing to adopt a discounted duty rate.

From a regulatory point of view the introduction of CNG has provided all participants with learnings at various points on the journey. One key element of the process relates to the treatment of CNG filling stations with regards to the capacity mechanism in place.

Currently the CRU has adopted a soft-landing period towards suppliers. This has allowed us to continue to ensure value for the end user, as it has given confidence in the monthly capacity costs. If this soft-landing period is removed, then the likelihood is that CNG stations will fall under the standard 'daily metered' gas pass through costs.

Circle K believe that any move to this type of capacity mechanism will add hugely to the cost of supplying natural gas to vehicles, and ultimately add cost to customers thus inhibiting that adoption of CNG vehicles in transport. It is critical, that the unique dynamics brought by the transport ~~sector~~ sector towards demand, are considered for the development of appropriate and predictable pass through regulated tariffs.

Finally, the current development supports are only in place along specific transport routes. For commercial operators to adopt and develop infrastructure at this point, it is critical that Irish or European funding is broadened out to allow the development of a nationwide network of fuelling infrastructure. The sooner clarity is available on this the sooner it is likely to see development of infrastructure along key transport routes outside of the Ten-T designated network. There are already transport companies looking to move to CNG, but the infrastructure doesn't support this move. The investment required to provide this

infrastructure without grant funding is significant and supports from government would be a significant support in the provision of this infrastructure.

- **What is needed to incentivise less polluting Light Commercial Vehicles?**

Circle K believes that many of the challenges facing adoption of less polluting LCV's are like those faced by the HGV haulage sector. Like HGV's, LCV's will benefit from greater adoption of BIOFUELS in this sector and from the wider adoption of CNG solutions, in that regard we would urge the consultation to consider the same points made above in the previous answer.

One key difference in terms of the available technology relates to potential for LCV's to adopt other drive train technologies such as Battery Electric (BEV's).

Circle K are already at the forefront of rolling out fast charge technologies in partnership with our charging partners ESB Ecars and Ionity. The latter provides the highest charging speeds available within the Irish market.

Speed of charging on the public network will be critical in driving the adoption of LCV's towards EV. Whilst in many cases LCV's will be able to charge in depots, there is expected to be a significant demand for high speed 'on the go' charging across the country.

In developing this infrastructure there are currently several key inhibitors that must be addressed

Grid Capacity – Time to connection

In line with current DECC policy, Circle K is looking to further develop charging infrastructure across our network. The development of this infrastructure would happen at a much quicker speed if the grid access and development was supported more by the network operator. Currently the timeline from an application through to granting of capacity is around 90 working days, this adds up to a timeline of almost 5 months. If Ireland is to have a significant increase in high speed charging, then fast tracking of these applications must be addressed.

Grid Capacity – Cost to access high capacity infrastructure

Circle K acknowledges that there is a high cost to be borne for the development and connection of high-speed EV charging infrastructure. We believe however that this cost must be subsidized to retail operators, as they are at the point of provision to end-users, and best placed for the further development of this infrastructure. The current EV market for LCV's and passenger cars is still very much in the 'early adaptor' phase, as such the costs for investment in the infrastructure must be supported, as the market is still not commercialized enough to absorb the fixed costs levied, and this acts as a barrier to entry into the fast charge market. Structure that successfully encourages the development of renewable generation infrastructure should be considered.

Tariffs and Levies

Retailer operational costs for high speed infrastructure is currently extremely high. The reasons for this are primarily due to the high cost of MIC capacity booking. In general, for installations of new high-speed chargers, sites will be connected at MV level. This treats high speed charging station in the same manner as large energy consumers, where the demand is designed around a high baseline of consumption. In the case of high-speed charging infrastructure, the demand is intermittent, and as such the capacity required does not represent the actual consumption that will happen on site. Once again, this high cost acts as a barrier to entry especially for smaller retail operators.

Another issue with the current tariff mechanism relates to the charging of the PSO levy. The PSO levy was designed to help in supporting renewable energy development. Circle K fully agrees and supports this, however the PSO levy is calculated based on MIC levels at a site, as such the development of EV infrastructure is directly impacted by the imposition of this levy as it can make up in excess of 40% of fixed charges associated with fast charging infrastructure. We strongly believe that this runs contra to the intention of the PSO levy, which is ultimately to assist in the decarbonization of Irelands energy emissions. We would urge government to consider how this structural contradiction can be addressed, as it will ultimately lead to lower operational and costs for consumers in the LCV sector.

Clavin Transport Services Dept of Transport Submission

What lessons can be learned from the COVID – 19 pandemic, in terms of Ireland being better prepared for any future pandemic and to help the resilience of Irelands supply chains? Ireland was lucky that this pandemic struck at the same time as Brexit because Irish supply chains had stocked up in anticipation of Brexit. Irish supply chains need to look at their resilience and how global changes can affect them. COVID-19 demonstrated that, despite having a workforce with an average age profile in the region of 50+, agility and openness to new ways of doing things are well within the capability of the road transport community. Good planning and communication is essential for success.

What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit? New supply lines need to be developed. Trade agreements need to be put in place with UK or possible pre cleared customs transit agreements for goods traveling through the UK to Europe. More streamlining and automation of customs. A study of how the changes have affected and will affect Ireland into the future. Possibly looking at availability of stock, alternative supply and in relation to haulage how can the thousands of trucks that used to work between Ireland and the UK be redeployed in a market that has an oversupply of heavy commercial vehicles.

How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time? N/A Internal transport operator

What is needed to incentivise the take up and usage of a greater number of less polluting HGV's? A proper viable alternative to diesel that has an adequate refuelling network to match diesel. Gas has only a handful of refuelling stations in Ireland and needs to be bio gas to deliver any significant Co2 reductions. Anaerobic digestion needs to become more popular for the production of biogas but a high proportion of planning applications for such facilities are being refused. Possible studies need to be carried out into harvesting gas from farm yard manure and farm slurry to help cut agri-green house emissions and use the gases as a fuel source. Long term it looks like battery or hydrogen fuel cell technology may be the way forward but there are no refuelling networks for these fuels. Ireland needs to look at how it can use its skills in industrial R&D to develop new innovative technologies to produce energy to power lower carbon vehicles. Making the total cost of ownership of eco-friendly HGV's comparable or cheaper than diesel vehicles will speed up uptake, initial high cost of gas vehicles (up to 40000 euro more expensive) and lack of fuelling network are slowing current uptake. Clavin Transport Services is committed to carbon reduction through efficient utilisation of vehicles and a relentless focus on back-loading, netting carbon savings of 230 tons from an 8 vehicle fleet in 2020. Although we are looking at eco-friendly vehicles there are no viable options for us in Ireland at the minute, the carbon savings from gas powered trucks would be nullified by the fuel burned taking the truck off route to refuel. A scrappage scheme for diesel to alternative fuel incentives would help the transition. Financial packages put in place to ensure haulage operations have access to money to buy these vehicles. No economic operator in Ireland is in a position to judge the real commercial risk of fleet renewal investments when the rate of underlying technology change and uncertainty is so high. The advanced age profile of many owner operators will trigger a significant down-scaling of the industry. Only the larger operators (>50 vehicle fleets) have the scale to sustain annual fleet renewal investments which leave them with a wide range of vehicle types. Dr James Carton, DCU professor and Chairman of Hydrogen Ireland is convinced that a technology roadmap consisting of Euro 6 + Diesel -> electric hybrid -> electric -> Hydrogen applies. However, he cannot say with confidence when these technology transitions will happen and the likely date of obsolescence of pre-Hydrogen

technologies. If a HGV vehicle has a 20 year life expectancy the market value of obsolete vehicles is impossible to judge in the absence of any guidance on the regulatory environment. Only a system whereby the state owns and leases back the evolving and diverse fleet to the economic operators can ensure smooth and accelerated uptake of more efficient vehicles. Heavy investments are also required to make alternative HGV energy sources available at point of use which the state or EU need to underwrite. As a comparative example, when eir or Vodafone invest in new technology to renew their telecommunications networks, they can offer increased data speeds, allocated frequency efficiencies and other benefits which can be monetised. No such benefits have been identified for HGV fleet operators in Ireland associated with these proposed changes. The ecological benefits of new fleet technology do not accrue commercially in an acceptably predictable way to the economic operators in the industry

Should eco-driver training be rolled out further, for example, as part of driver CPC training? There is a good chance that rolling out eco-driver training now would be too little too late if the focus is going to be on converting HGV's to alternative fuels. Driver CPC's at present only pay lip service to eco-friendly driving techniques, to deliver real benefits it may need to be a practical driving course. Education and promotion of alternative powered vehicles through the CPC might generate interest in eco vehicles from the ground up.

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? Please see attached our proposal for an eco-logistics village on the Offaly/Westmeath border which rethinks how bulk logistics operates in Ireland, will cut freight journeys and congestion between the midlands and the east coast and net almost 15000 ton carbon emissions per annum as drive train technologies evolve. Ireland needs to rethink how logistics operate and develop new platforms to facilitate the exchange of freight to cut empty kilometres travelled by the national fleet. Tenders for large haulage contracts need to have the amount of trips that the haulage provider can backload the tendered work as part of the criteria to get the work. At present there is an over-supply of HGV's in Ireland which is worsened this year because so many international hauliers have been displaced by Brexit and they are now competing for internal work, this is resulting in more empty running, wasted man hours and massive carbon emissions increases. It's our belief that Irelands grossly inefficient road transport sector is placing huge environmental and economic cost on the country and that Ireland needs to be looking at maximising the utilisation of a smaller fleet instead of investing heavily in bigger road networks to handle more vehicles running empty.

What are the road safety priorities in road haulage for the next ten years? As technology evolves and transport vehicles become safer the last major area for road safety improvements is reducing congestion. A combination of more workers working from home in Ireland and a smaller more efficient national fleet travelling less empty kilometres has to have massive road safety benefits over the next ten years. The development of an Eco Logistics village at Derryarkin Co Offaly would increase road safety significantly by reducing peak time HGV traffic in population centres, drawing daytime activity into purpose build logistics centres where safety and operational efficiency (including CO2 emission reduction) can be optimised.

What are your views on how Ireland implements the Mobility Package changes? The Mobility Package changes outlined include implementation of a new directive concerning electronic freight transport information. Ireland is an ideal location to pilot the implementation of a ground breaking platform which could underpin the leasing of the HGV fleet at a national level, the performance monitoring of that fleet and the assurance of CO2 optimal performance of that fleet

Are the needs of freight transport sufficiently taken into account with the national infrastructure planning and investment programme? I believe that national infrastructure planning is completely misaligned with freight transport efficiency and carbon reduction. The motorway network in Ireland appears to have been planned on a cost to construct model resulting all the major motorways having gradients in some sections far too steep for HGV's to operate efficiently resulting in thousands of tons of excessive carbon emissions over the last twenty years. Bad roads planning is rampant all over the country, it takes more fuel for a fully loaded HGV to travel around the Tullamore bypass because of its bad engineering than it does for that vehicle to come from Dublin to Tullamore. A proper roads link from Armagh to Portlaoise is needed to alleviate congestion on the M50. A focus on maintaining what is there is correct because a reduction in the national fleet is ultimately what is needed.

What more is needed in relation to road user charging for freight transport in Ireland? As well as toll roads charging less for eco- friendly vehicles they should also be encouraged to charge less for loaded HGV's to encourage hauliers to work harder on minimising empty running. A move away from a road tax to a carbon tax model may help too. These changes will encourage change but do not, in themselves, in any significant way mitigate the risk arising from exposure to poorly understood technology obsolescence risk for any fleet investment in the coming 20 years. Economic operators would be better served if the risk of these capital investments was absorbed by EU or state entities

How can people be encouraged to take up work in the road haulage sector eg as HGV drivers, Transport Managers, customs roles etc? Transport and logistics needs to be promoted as an attractive career path with career opportunities from secondary school level upwards. Career guidance teachers need to be educated on the options available to students who may be interested in the area. Fewer people with more qualifications and skills, earning higher rates of pay and working more regular hours in more favourable working environments will help attract people into the industry. The hype surrounding driverless vehicles is a clear example of poor understanding of emerging technology leading to negative outcomes for the industry – most leaving cert students (and their career guidance teachers) do not believe they can make a viable long term career as a truck driver and, for that matter, within the logistics industry. An apprenticeship scheme for young drivers would possibly help

How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced? Through education and promotion particularly through social media. A comprehensive end to end plan involving the development of eco logistics centres nationwide, fleet evolution, carbon emission elimination and industry structure (i.e. the economically optimal target mix of sole trader/operators, small scale operators and large scale operators) needs to be laid out to help build confidence in the industry as a career option for young people

How can the ability of the sector to attract and retain talent be strengthened to services the demands for skills over the coming years? We believe this question to be flawed. The sector is struggling to meet demand for people to operate a grossly inefficient system. We would argue that proper meaningful research and development into efficient and effective supply chain systems would allow the sector to operate more efficiently on less workers but create higher value and more attractive jobs for the current workforce. Focus on efficient fleet operation at national, regional, major urban/local authority, enterprise and driver level. An accelerated rationalisation of the national fleet/industry landing on a target operating model specifying capacity, distribution, blended scale of operators and criteria for the award of/qualification for supports will assist in motivating young people to engage with the industry.

Is freight transport being taken into account sufficiently within Ireland's integrated transport planning system, particularly the various transport strategies for urban areas? There is no public, co-ordinated planning for the north midlands (Longford/Westmeath/Offaly/Roscommon) concerning eco logistics hubs or equivalent. While the climate action plan mandates each local authority to produce a plan, there no instruction to these local authorities to collaborate in order that some critical mass to match the main urban areas could be achieved. A significant variety and density of refuelling solutions will have to be planned for covering the technical evolution of fleets in the coming 20 years – the scale and commercially uncertain nature of these investments will require public and private partnership and collaboration at the local authority level of the less populated districts in Ireland. The focus on solely urban areas of Dublin, Cork, Limerick and Galway is not addressing the full national need and risks leaving significant areas of the country behind in terms of cost competitiveness

What further action is needed to improve the hinterland connectivity of Ireland's ports and airports, particularly in light of Brexit? Clavin Transport Services Ltd has set the ambitious goal of being carbon neutral by 2030 and is currently in the process of re-branding to show our customers and the wider community our commitment to eco logistics. We currently have a proposal submitted to Bord na Mona for the creation of an eco logistics village on the Westmeath/Offaly border. We believe that eco-friendly vehicles is only part of the solution and that far greater economic and environmental savings can be realised by creating efficient and effective supply chain systems linking the midlands to the east coast. We believe our eco logistics village model to be a totally new concept in Ireland and possibly Europe. We've attached a copy of our proposal as part of this submission and would be very grateful for any inputs or referrals which would help us realise our ambitions

Page 1 – Why should Bord na Mona talk to us about an Eco Logistics Village at Derryarkin?

On 23rd March 2021, the updated Climate Action plan and the governments proposed legislation to aggressively accelerate the countries response to climate change put a new focus on efficiency in the Logistics industry. This has created an opportunity for Bord na Mona to look again at the potential of its Derryarkin Co Offaly site. Clavin Transport Services Limited propose that this site be developed as an Eco Logistics Village. The proposed development would combine Bord na Mona’s leading position in renewable energy generation with the midlands most operationally efficient heavy haulage business. The over-riding driver for the proposal is operational efficiency. The evolution of battery, hydrogen, wind and photovoltaic technologies are factored into the proposal, however, the basic business case is technology agnostic. We agree with the good work done by, for example, [UCC’s MaCRE team](#). Uniquely, we can demonstrate how the heavy haulage sector in Ireland can moved from oil dependence to sole reliance on renewable energy sources sooner than 2050. Technology is only part of the story – optimal resource utilisation is our key differentiator. Our mission is to convince the heavy logistics and environmental communities that this is the obvious way to go so that the efficiencies we demonstrate can be scaled up. As a potentially key stakeholder and player in this new vision of how heavy logistics can operate in Ireland in the mid to late 21st century, Bord na Mona have the opportunity to put this under its portfolio of new business lines. We can explain how this pays for itself with real numbers.

Ireland's Road freight activity by commodity group carried, 2019

Commodity	Tonne-km <i>million</i>	Tonnes carried <i>thousand</i>	Vehicle kilometres <i>million</i>
Products of agriculture, forestry and fishing	1,313	14,183	91
Coal and natural gas	88	923	8
Quarry products, metal ores and peat	1,446	42,053	73
Foodstuffs	3,024	25,899	272
Textiles and leather	80	674	15
Wood, pulp and paper	535	5,037	51
Coke and refined petroleum products	717	10,324	46
Chemicals and plastics	504	4,512	50
Other non-metallic mineral products	1,116	25,822	85
Metal products (except machinery and equipment)	261	2,121	22
Machinery and equipment	274	2,470	34
Furniture and other manufactured goods	217	1,698	55
Secondary raw materials and waste	469	6,143	52
Other goods	2,358	17,554	881
Total	12,403	159,414	1,734

Table 1: Clavin Transport Services limited specialise in the heavy transport areas highlighted here.

Page 2 – Logistics Industry in Ireland operates well below international best practice efficiency standards

Bulk logistics continues to be an under developed sector of Irish industry with major inefficiencies in how companies utilise their resources to maximise productivity. An Inefficient transport network has massive economic and environmental costs. Over the last 30 years this has created a false normal for people's perception of freight vehicle requirements in Ireland. This has led to:

- Too many providers in the Industry
- Unfocused business models
- Cultural move towards shorter and shorter lead times
- Firefighting planning instead of effective planning
- Regulations trapping operators into the perceived need to stick to one sector/customer

These manifest in businesses as:

- Companies operating in one sector which results in
 - Poor utilisation (<50% loaded running => high carbon footprints/fuel costs)
 - Wasted man hours (high non-fuel operating costs).
- Lack of focus on Environmental impacts including:
 - Procurement Practices focused on lead time precision to the detriment of carbon footprint and delivery cost.
 - Excessive Carbon emissions per ton moved.
 - Lack of thought/discussion about public perception of Industry inefficiency
- Lack of investment in ICT and R&D resulting in reduced flexibility and responsiveness to business need.
- Lack of automation through ICT creating un-needed support staff positions which are both slower, more vulnerable to human error and more expensive.

What we do differently?

- Strategic planning, Procurement Planning, application of lean production methods, focused service offering, Marketing & Branding to support the business model
- Development of our ICT platform has allowed us to move far beyond the industry standard of 1 support staff per 4/5 trucks while increasing our customer service offering through web-based support services
- Clavin Transport Services limited is an intensive bulk transport provider across different heavy transport sectors.
- Absolute focus on minimising empty running.
 - Clavin Transport Services moved 7,879 Loads (254,669 tonnes) in 2020
 - We move 1 ton between the midlands and east coast on .53 litres less fuel than our competitors.
 - Netting 229.50 tonnes carbon emissions savings in 2020 compared to other operators.
- Move towards bulk logistics solutions, marketing and complete contract solutions
- Establishment of a long term charity funding relationship with the Make A Wish Foundation

Page 3 – 10-year Plan

The Concept

- An industrial Eco village and logistics centre of excellence in the heart of the midlands that is home to a group of businesses who share the common goal of carbon neutral manufacturing, reprocessing, renewable energy application and logistics.
- A 24 hour bulk logistics eco hub serving as a satellite distribution centre to Dublin connecting the greater midland region to the east coast
- A facility strategically located to optimise transport movement between Dublin and the midlands allowing 100% back loading of eco/silent transport vehicles 24 hours a day cutting the number of freight journeys to the east coast
 - removing vehicles at peak times from the already over congested capital city
 - spreading the remainder over a greater period (24hr) – peak traffic avoidance.
 - Creating huge socio and economic benefits for both the midlands and the east coast.
- A self-sustaining eco hub within range of Dublin to allow renewable energy powered trucks of the future move freight fast and efficiently between our ports and major industries in the midland and east coast

Evolution of the site

- Year 1
 - Investigate / Feasibility study
 - Contracts in place with landowners
 - Site planning
- Year 2/6
 - Phased Re-instatement of lands (see below)
 - Development of infrastructure
 - Criteria for tenants
 - Invitation and vetting for potential eco-partners
- Year 5/10
 - Bord na Mona development of renewable road transport fuel sources on site (Hydrogen/bio-gas/Wind/Solar)
 - Grow the portfolio of diverse businesses on Eco Logistics Village site
 - Perfecting systems in a carbon neutral fashion by 2030.

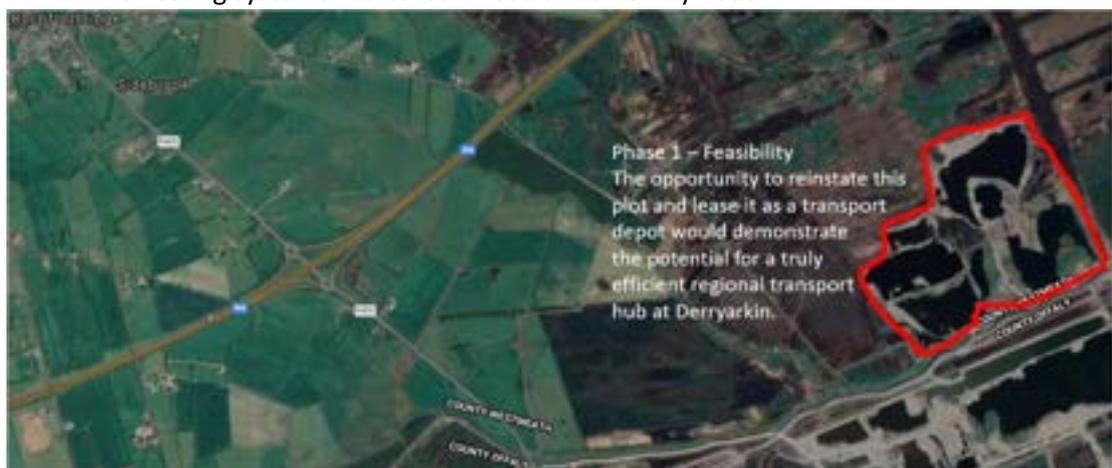


Figure 1: Initial phase – feasibility demonstration of extreme carbon footprint efficiency per tonne kilometre moved.

Page 4 – Why Derryarkin

- A drivers shift allows driving time of 9 hours. Clavin Transport Services get three round trips to Dublin and back with loads both ways. Other operators do 4 trips per shift, returning empty. That's 50% more paid work per driver per day and per truck kilometre. Derryarkin is the ideal distance from Dublin to get best value from a driver's working day.
- 72KM to M50/M4 intersection, Dublin
- Adjacent to motorway network
- Low Population Density
- Area of high industrial intensity (Aggregate extraction/Peat Production)
- Lands requiring rejuvenation and alternative uses
- The area is transport intensive with a large percentage currently returning empty
- The greater Derryarkin area would benefit from its lands being claimed back from the extractive industry and returned to more ecologically friendly uses
- The greater Midlands and Eastern Regions would benefit from a lower cost of doing business.
- Displaced workers could retrain and find jobs in new and exciting eco-friendly projects
- The greater Midlands and Eastern Regions would come to the forefront of sustainability and eco-friendly initiatives
- Road users would benefit from a safer less congested roads network
- Initially, loads from the greater Derryarkin area will increase to circa 200 loads per day:
 - Matching these to backloads will decrease carbon emissions up to 50% with current technology
 - Using renewable energy powered vehicles and introducing backloading will result in a reduction in carbon of 54.40 tons per day or 13,600 tons per year based on a 250 day working year



Figure 2: Potential Stakeholder Map as the Eco Logistics Village concept evolves.

Page 5 – Stakeholders/Potential Users

The Midland Gateway Eco Logistics Village

Home to a group of businesses who share the common goal of carbon neutral manufacturing, reprocessing and logistics.

- The animal feed industry for storage and distribution of animal feed ingredients to the six major feed mills in the greater midlands region
- The waste industry whereby these sand trucks haul back material to businesses in the facility who can treat, reprocess or remanufacture these waste products into new usable materials.
- The freight industry (container and RORO) using electric trucks to collect freight from the east coast during the night and transporting to the hub for next day delivery
- The aggregate manufactures themselves for production and remanufacturing of aggregates
- Alternative energy producers
 - Wind is planned for the area
 - Solar can be put on roofs of builds and dispersed throughout the site
 - Bio-Gas anaerobic digestion removing food waste from Dublin to create renewal energy and fertiliser for local farmers
 - Hydrogen fuel may be the most promising fuel source to replace diesel and petrol in a carbon neutral economy of the future with green hydrogen being its most environmentally friendly variant. Green hydrogen is produced using renewable electricity and water. This renewable energy can be solar or wind energy. Nikola motors vision of hydrogen production and filling stations of the future will produce 8 tons of hydrogen per day but they require 75000 litres of water and 17.8 megawatts of green electricity to produce this 8 tons. This puts Derryarkin with its huge man-made lakes and its location in the centre of several planned and up and running windfarms as possibly one of the best hydrogen production locations in Ireland.
- The education system working in conjunction with the national and international education and environmental bodies to develop best practices in logistics and eco-friendly manufacturing.

Benefits \ Stakeholders	Bord na Mona	Central Government	Revenue	Offaly & Westmeath Co Councils	Local Business	Dublin Port
Quantifiable CO ₂ footprint reduction (detailed business case + environmental plan)	✓	✓	✓	✓	✓	✓
Midlands based jobs suitable for former B. na M. people	✓			✓		
Optimal materials extraction, transport, processing (e.g. sand)	✓			✓	✓	
Reduce cost of doing business in the midlands	✓			✓	✓	
Renewable energy usage at scale for heavy haulage	✓	✓			✓	
Road, land and new vehicle types optimisation	✓	✓		✓	✓	✓
Take heavy haulage out of town and cities (Safety)	✓	✓	✓	✓	✓	✓
H ₂ production and use at a safe distance from people	✓	✓		✓	✓	✓

Table 2: Potential Stakeholder map – we believe all these potential stakeholder can be convinced and buy into the concept, but we need Bord na Mona’s permission to move the conversation forward.

Clean Ireland Recycling

Quin Road Business Park, Ennis, Co. Clare

Tel: +353 (0) 65 689 1350 Fax: +353 (0) 65 689 1349

Email: admin@cleanirl.com Web: www.cleanireland.ie

Waste Collection Permit Number: NWCPO-09-05595 EPA Facility Number: WO 253-01



Road Transport Freight Policy Division,
Department of Transport,
Leeson Lane,
Dublin,
D02 TR60.,

Wednesday 23rd June 2021

Clean Ireland Recycling - Ten-year Strategy for the Haulage Sector

To Whom it May Concern,

Clean Ireland Recycling has over 30 years' experience in the waste management industry and has developed into one of the leading providers of waste management services in the Mid-West of Ireland.

The company operates under a Waste Collection Permit and services the commercial and industrial sectors as well as servicing some 40,000 household customers with weekly kerbside waste collections.

Clean Ireland Recycling has a fleet of 45 refuse collection vehicles. In recent year, the company made the decision to transition to alternative fuels for its fleet where feasible. This has helped to maximise efficiencies within the business and minimise the company's impact on the environment by reducing CO₂ emissions. At present, the company operates three Compressed Natural Gas (CNG) refuse collection vehicles with another planned for late-2021 and two ELVs for its sales reps.

Clean Ireland Recycling wholly supports the Programme for Government in its aim to improve standards within the road haulage sector, in creating secure employment and with its goals for a low-carbon future. Government has made good progress to-date however greater supports for the sector are needed to achieve this in the long-term.

As part of your public consultation phase for the Department of Transport's Ten-year Strategy for the Haulage Sector, we wish to make the following points:

- More incentives are needed for businesses to encourage the replacement of older HGVs with those providing cleaner emissions, such as renewable biogas or CNG. While the company supports the Alternatively Fuelled Heavy-Duty Vehicle (AFHDV) purchase grant scheme; these unfortunately do not go far enough.

Complete Waste Management By Recycling
Recycling for the Future

VAT Number: 6550066E Company Registration Number: 152666



Clean Ireland Recycling

Quin Road Business Park, Ennis, Co. Clare

Tel: +353 (0) 65 689 1350 Fax: +353 (0) 65 689 1349

Email: admin@cleanirel.com Web: www.cleanireland.ie

Waste Collection Permit Number: NWCPO-09-05595 EPA Facility Number: WO 253-01



- It is critical that the Government extend the low excise rate for natural gas and biogas beyond the eight-year period. This will further incentivise uptake of CNG and other technologies as companies re-emerge following the downturn caused by COVID-19 and (in the longer term) Brexit.
- Government needs to significantly increase the rollout of refueling infrastructure for alternative fuels and technologies across the country. This is seen as one of the principal deterrents for the uptake of lower-emission HGVs.

We thank you for the opportunity to submit towards the Ten-year Strategy for the Haulage Sector. If you need any additional information, please contact me on the number below.

Thank you.

A handwritten signature in black ink, appearing to read 'B Lyons'.

Brian Lyons

General Manager
Clean Ireland Recycling



Complete Waste Management By Recycling
Recycling for the Future

VAT Number: 6550066E Company Registration Number: 152666



Road Transport Freight Policy Division,
Department of Transport,
Leeson Lane,
Dublin,
D02 TR60



Date: 16 July 2021

Dear Sir/Madam,

Re: Public Consultation on Ten-year Strategy for the Haulage Sector

daa plc welcomes the opportunity to contribute to the public consultation on the Ten-year Strategy for the Haulage Sector. daa plc commends the work completed on the strategy to date and recommends that the points below be considered as the drafting process for the Ten-year Strategy for the Haulage Sector proceeds.

- **Recommendation 1:** Haulage strategy should recommend the optimisation and enhancement of surface access to Dublin Airport to strengthen the T-TEN network and enable the efficient movement of freight from through and to Dublin Airport.
- **Recommendation 2:** Optimising existing motorway and regional road (M1/M50/R132) provides the best return on investment in existing road infrastructure in the vicinity of Dublin Airport, enabling the movement of air freight from, through and to Dublin Airport. Optimising this network will facilitate the haulage of air freight from, through and to Dublin Airport.
- **Recommendation 3:** Haulage strategy should prioritise provision for investment in the infrastructure to support the decarbonisation of heavy goods and commercial vehicles, in tandem with all relevant stakeholders at Cork and Dublin Airports.
- **Recommendation 4:** Continued development of cargo handling facilities at Dublin Airport to efficiently and sustainably support €19 billion in imports and exports and the wider all island economy.
- **Recommendation 5:** Support the amendment of the onerous conditions attached to the grant of planning for North Runway, which would restrict capacity at Dublin Airport at key times , so that cargo distribution networks and the critical supply chains they serve, can continue to operate efficiently and effectively.

Background

The consultation document cites a lack of information on the air freight sector in Ireland which has impeded the consideration of the sector's role in supporting the Irish haulage sector and the role it plays in the wider Irish economy. **Dublin Airport is Ireland's busiest cargo airport, handling 90% of the country's air freight and 35% of all Ireland's trade by value¹. Air**

¹ The Economic Impact of Cargo Night Flying at Dublin Airport (March, 2020), York Aviation

freight flown at night accounts for 38% of this volume, equivalent to €19 billion in imports and exports.

Ireland's airports handled 146,000 tonnes of air cargo imports and exports in 2019, about 15% lower than the historical peak of 188,000 tonnes in 2011. Circa 40% of that cargo travels on dedicated air cargo flights, with the remaining 60% carried in passenger flights (known as "bellyhold" cargo). Air freight supports in the regional of 15,000 jobs and contributes €1 billion in GDP.

A tonne of air freight is estimated at 53 times more valuable than a tonne of freight travelling via another mode of transport². Goods transported by air include medical or pharmaceutical products, financial, legal or business documents, critical manufacturing components or spares, perishable produce high value consumer goods, and priority items such as time sensitive clinical samples and medicines.

Air freight, and the haulage sector which supports it, is thus essential to the Irish economy and its connection to global trade. The strategic value of Dublin and Cork Airports' air freight capacity was demonstrated during the COVID-19 pandemic as the airports enabled the rapid importation of Personal Protective Equipment (PPE), vaccines and other medical equipment, as well as the export of lifesaving equipment to India in May 2021.

Recommendations

Here follows a list of key recommendations which should be incorporated in the forthcoming Ten-year Strategy for the Haulage Sector.

- **Recommendation 1:** Haulage strategy should recommend the optimisation and enhancement of surface access to Dublin Airport to strengthen the T-TEN network and enable the efficient movement of freight from through and to Dublin Airport.

The latest Dublin Airport Mobility Management Plan indicated a decrease in the modal share of private transport in passenger movements to and from Dublin Airport. The addition of BusConnects and MetroLink will further decrease the modal share of private transport in passenger movements. Notwithstanding this decrease, as the Irish economy recovers in the aftermath of the COVID-19 pandemic, it is important that the road network in the vicinity of Dublin Airport be protected and preserved to safeguard access to and from the national airport.

The critical role which Dublin Airport plays in facilitating freedom of movement for goods, services and the wider population requires a proactive approach to ensure that transport options to and from the airport are provided in the most efficient form possible. daa is keen to work with all relevant stakeholders to ensure that surface access is maintained, optimised, and expanded in line with demand. The TEN-T network is an all island network therefore it is critical that it functions efficiently, particularly in relation to the movement of goods to Dublin Airport from producers across the island to overseas markets.

- **Recommendation 2:** Optimising existing motorway and regional road (M1/M50/R132) provides the best return on investment in existing road infrastructure in the vicinity of Dublin Airport, enabling the movement of air freight from, through and to Dublin Airport. Optimising this network will facilitate the haulage of air freight from, through and to Dublin Airport.

At a local level, the capacity of the existing motorway and regional road (M1/M50/R132) network in the environs of Dublin Airport will require optimisation in order to support existing

² The Economic Impact of Cargo Night Flying at Dublin Airport (March, 2020), York Aviation

and forecasted volumes of traffic, including heavy goods vehicles moving freight to and from the airport. Stakeholder collaboration will be critical in order to maintain and enhance the existing regional and motorway road network in the environs of Dublin Airport. In addition, opportunities for the optimisation of the road network within the environs of Dublin Airport can also be harnessed if the night-time airfield operating framework is compatible with the movement of HGVs and commercial vehicles at off peak traffic times (per Recommendation 5 below).

- **Recommendation 3:** Haulage strategy should prioritise provision for investment in the infrastructure to support the decarbonisation of heavy goods and commercial vehicles, in tandem with all relevant stakeholders at Cork and Dublin Airports.

As Ireland transitions to a low carbon economy, the electrification of certain aspects of the transport sector will be a key objective. Industries like aviation, heavy logistics and shipping will increasingly seek to source alternative sustainable fuel technologies such as Compressed Natural Gas (CNG), Hydrogen and Sustainable Aviation Fuel (SAF).

To facilitate this, the government should consider adopting a similar strategy to its European counterparts and create sustainable fuel hubs where hydrogen/SAF/CNG can be developed and processed and provided via an interconnector to the rest of the country. Given the strategic importance of Dublin Airport and Dublin Port, particular consideration should be given to the development of a sustainable fuel hub in the vicinity of the airport to increase accessibility and connectivity for heavy logistics and aviation.

Dublin Airport is one of the largest public transport nodes in the State. daa is keen to implement infrastructure which will service the transition of public transport vehicles as well as Heavy Goods and Commercial vehicles to low and no carbon fuels. Investment in hubs for large scale decarbonised fuels will require engagement between government, transport stakeholders and daa as well as a dedicated long-term strategy on the decarbonisation of fuels for public transport and haulage vehicles

- **Recommendation 4:** Continued development of cargo handling facilities at Dublin Airport to efficiently and sustainably support €19 billion in imports and exports and the wider all island economy.

The existing cargo handling facilities at Dublin Airport are currently reaching capacity, handling 150,000 tonnes per year at 10 tonnes per m². New handling facilities will be required to accommodate the long term forecasted increase in cargo volumes up until 2050. Expanded temperate control storage areas will need to be a feature of new investment if Dublin is to capitalise on its competitive advantage of a strong domestic pharmaceutical industry and keep pace with other European airports. This critical need must be supported by regulatory frameworks, including the Commission for Aviation Regulation through its economic regulation of Dublin Airport, and planning authorities through support of this critical development delivering on the spirit of National Strategic Outcome 6 “High Quality International Connectivity” of the National Planning Framework.

- **Recommendation 5:** Support the amendment of the onerous conditions attached to the grant of planning for North Runway, which would restrict capacity at Dublin Airport at key times , so that cargo distribution networks and the critical supply chains they serve, can continue to operate efficiently and effectively.

Onerous conditions which would restrict runway capacity at Dublin Airport at key times will have a detrimental impact on the efficient movement of HGVs and commercial vehicles and hinder the application of intelligent demand management and integrated transport planning.

Restrictions on night flights, in particular, will result in additional pressures on early morning and evening road capacity when public and private transport serving the airport and transiting through the roads in the environs of Dublin Airport is at its heaviest.

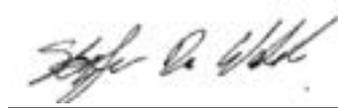
Conclusion

daa welcomes the opportunity to contribute to the formation of the Ten-Year Strategy for the Haulage Sector. daa is committed to working with stakeholders to enhance the efficiency and sustainability of the haulage sector serving Cork and Dublin Airport's air freight capacity.

If the Department would like any additional data on the role which air freight plays in the supporting the economy, this submission is accompanied by two reports that outline the role this sector plays in supporting the Irish economy.

- York Aviation (2020), "*The Economic Impact of Cargo Night Flying at Dublin Airport*"
- IATA Factsheet (2018), "*The Importance of Air Transport to Ireland*"

Yours sincerely,



Stephen Walsh

Statutory Planner

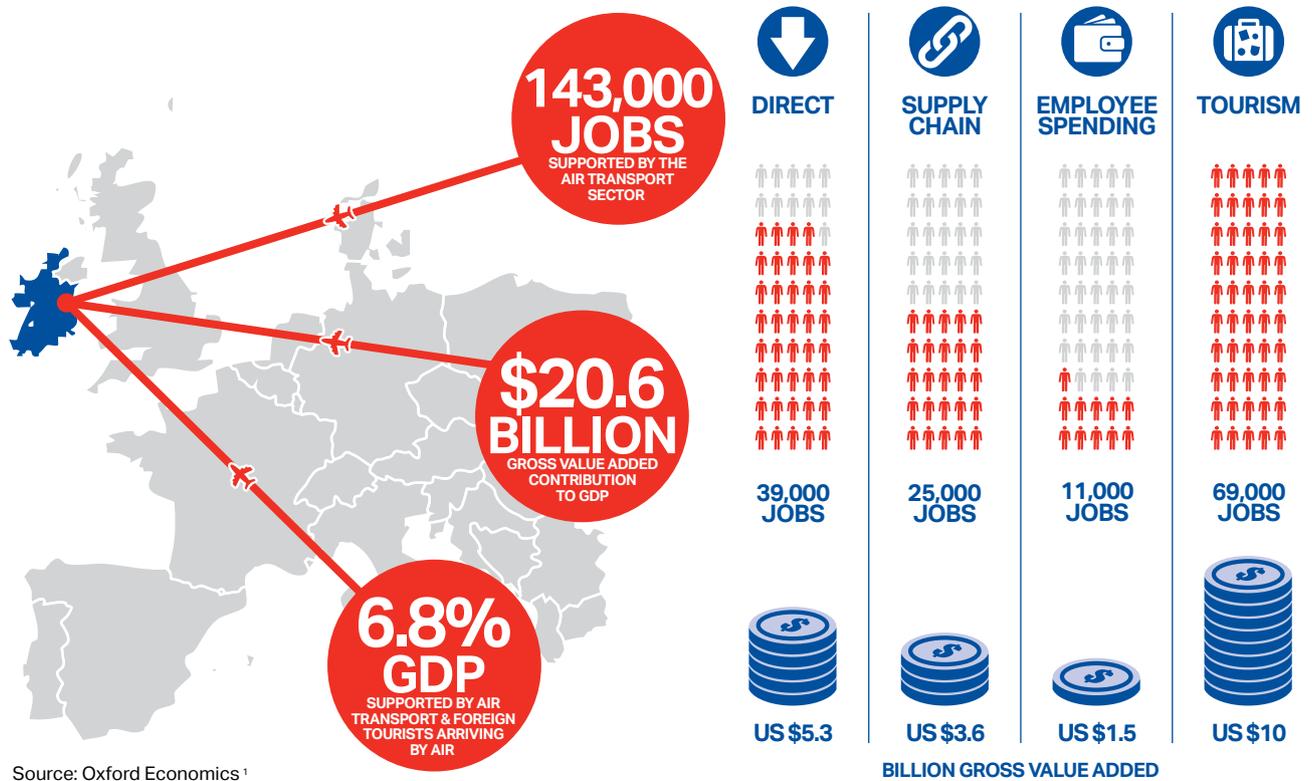


THE IMPORTANCE OF AIR TRANSPORT TO IRELAND



The air transport sector makes a major contribution to Ireland's economy

There are different ways of measuring air transport's impact on an economy. We look at three: the jobs and spending generated by airlines and their supply chain, the flows of trade, tourism and investment resulting from users of all airlines serving the country, and the city pair connections that make these flows possible. All provide a different but illuminating perspective on the importance of air transport.



The air transport sector supports...

Airlines, airport operators, airport on-site enterprises (restaurants and retail), aircraft manufacturers, and air navigation service providers employ 39,000 people in Ireland. In addition, by buying goods and services from local suppliers the sector supported another 25,000 jobs. On top of this, the sector is estimated to support a further 11,000 jobs through the wages it pays its employees, some or all of which

are subsequently spent on consumer goods and services. Foreign tourists arriving by air to Ireland, who spend their money in the local economy, are estimated to support an additional 69,000 jobs. In total 143,000 jobs are supported by air transport and tourists arriving by air.

...and spending

The air transport industry, including airlines and its supply chain, are estimated to support US \$10.4 billion of GDP in Ireland.

Spending by foreign tourists supports a further US \$10.2 billion of the country's GDP, totaling to US \$20.6 billion. In total, 6.8 percent of the country's GDP is supported by inputs to the air transport sector and foreign tourists arriving by air.

For forecasts of the industry's GDP and jobs contribution over the next 20 years see page 4

Air transport facilitates flows of goods, investment and people



Note: Data relate to all modes of transport / Source: UNWTO, UNCTAD and World Bank²

The most important benefits from air transport go to passengers and shippers and the spillover impacts on their businesses. The value to passengers, shippers

and the economy can be seen from the spending of foreign tourists and the value of exports (though note these figures include all modes of transport). A key

economic flow, stimulated by good air transport connections, is foreign direct investment, creating productive assets that will generate a long-term flow of GDP.

Top five international tourist arrivals (all modes of transport) by country of residence³

1. United Kingdom
2. United States
3. Germany
4. France
5. Spain

Top five busiest direct flights arrivals

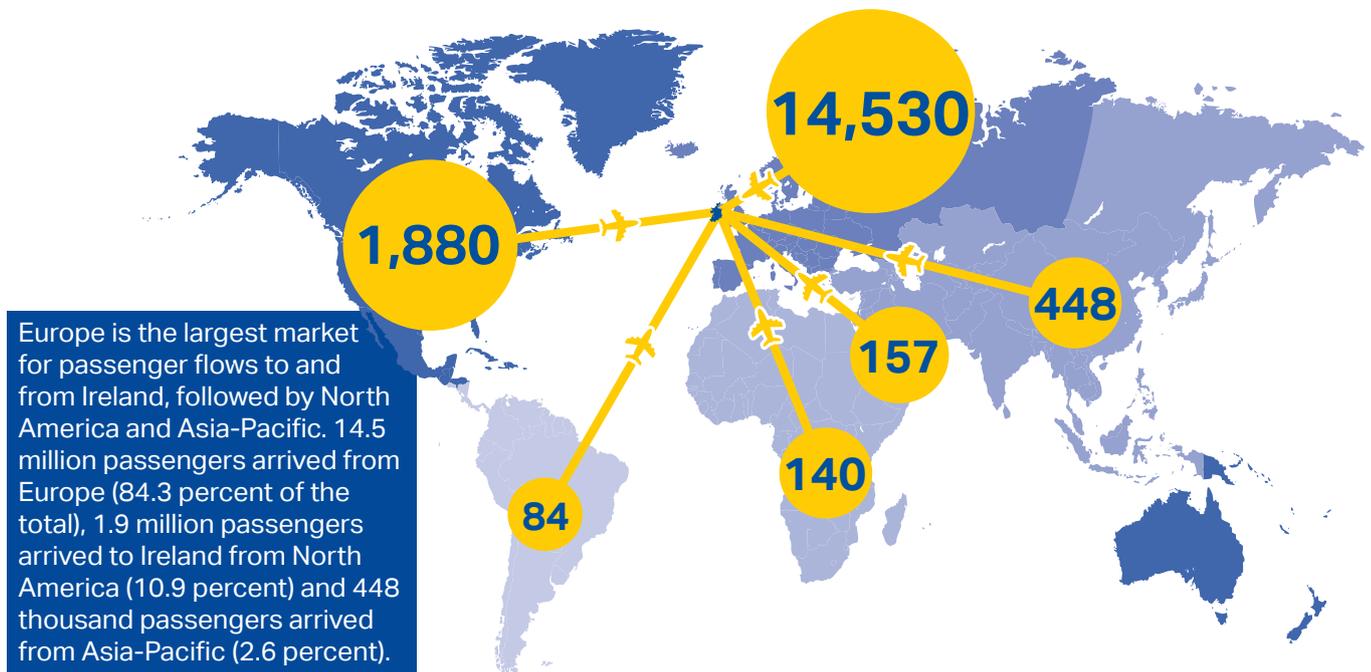
1. United Kingdom
2. Spain
3. United States
4. Germany
5. France

Top five busiest air cargo routes

1. United States
2. United Arab Emirates
3. United Kingdom
4. Canada
5. Qatar

Source: UNWTO and IATA²

Annual passenger flows by region (origin-destination, '000s)



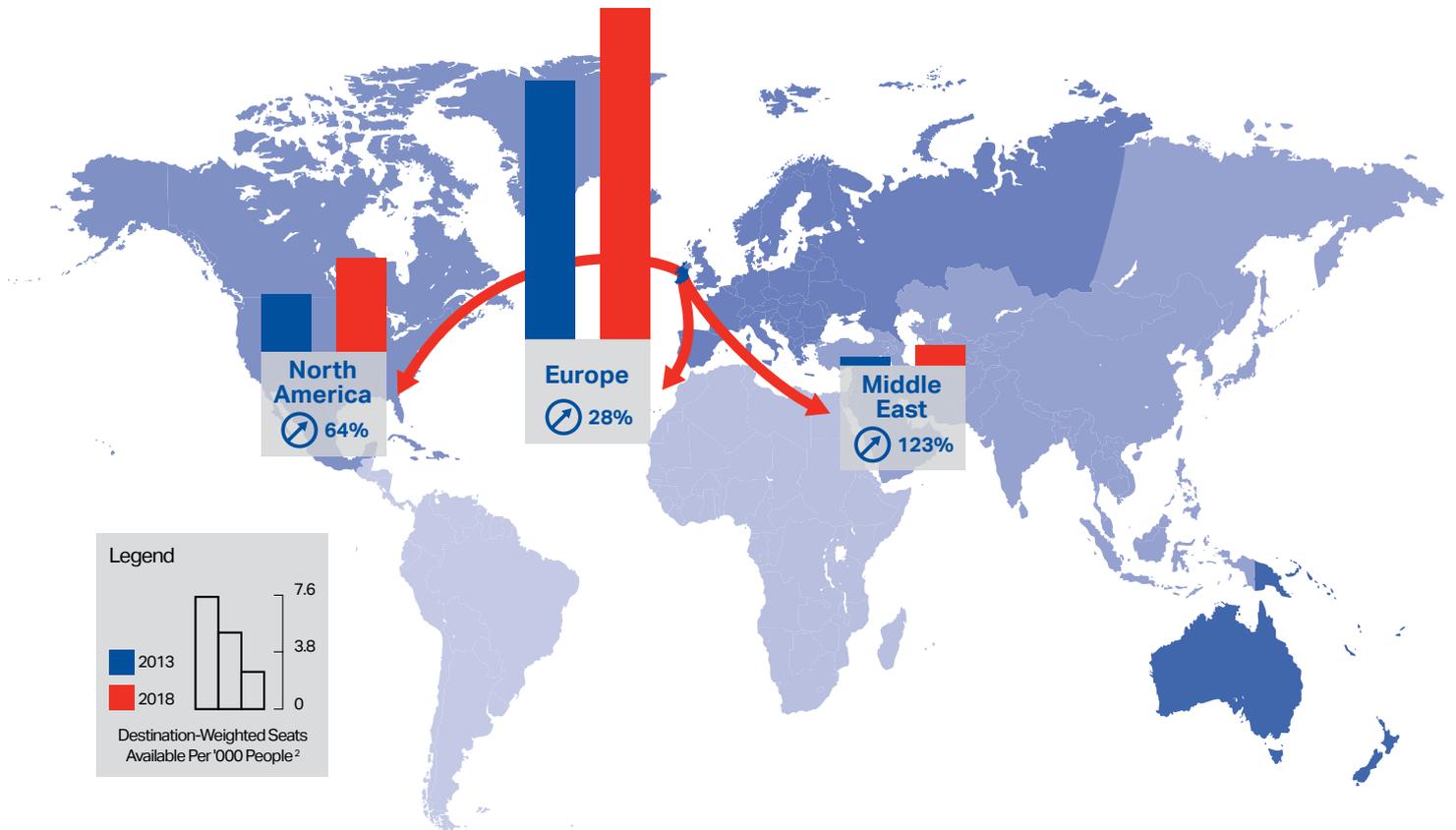
Source: IATA Direct Data Solutions

³ Arrivals of non-resident tourists at national borders or in all types of accommodation establishments, by country of residence.

Air transport connects Ireland to cities around the world

Air transport generates benefits to consumers and the wider economy by providing speedy connections between cities. These virtual bridges in the air enable the economic flows of goods, investments, people and ideas that are the fundamental drivers of economic growth.

Map of Ireland's air connectivity, by its largest markets (segment basis)⁴



IATA's measure of how well a country is connected to economically important cities around the world is shown above. The map shows Ireland's connectivity

at a regional level and how it has evolved. Ireland's connections to the Middle East have grown the fastest over the last five years.

Number of international city pairs direct service in the top ten countries by passenger numbers in the world

- 24 United States
- 1 People's Republic of China
- 0 Japan
- 58 United Kingdom
- 0 India
- 0 Indonesia
- 43 Spain
- 16 Germany
- 0 Brazil
- 28 France



Source: IATA, Aviation Benefits Beyond Borders 2018 report

⁴ The air connectivity scores reported are total destination weighted seats per 1000 people. IATA developed the Air Connectivity Indicator calculated based on the total route capacity (in terms of seats available) weighted by the destination airport's relative capacity (calculated as the ratio of seats available at that airport relative to the capacity at the airport with most available seats) divided by the population size of the country with a 0.15% of connectivity threshold in 2013.

Ease of travel, cost competitiveness, and trade facilitation are vitally important

If air transport's unique contribution is the bridges it creates between cities, then the flows of goods, people, investment and ideas that stimulate economic development must flow unimpeded to maximise their contribution to consumers and the wider economy. Here we measure how freely goods and people flow across borders.

Passenger facilitation and cost competitiveness

Ireland's passenger facilitation (4.3/10) scores slightly above the European average (4.1/10). On the World Economic Forum's Travel & Tourism Competitiveness Index, the country ranks 105th for visa openness and 39th out of 136 countries for cost competitiveness. In all these scores and ranks, higher is better.



Measures of air cargo trade facilitation

Ireland's facilitation of air cargo through its customs' and borders' regulations ranks 32nd out of 124 countries in terms of the Air Trade Facilitation Index (ATFI) and 50th out of 135 countries in terms of the eFreight Friendliness Index (EFFI) globally⁸. The Enabling Trade Index (ETI)⁹ ranks Ireland 20th out of 136 countries globally for the facilitation of the free flow of goods over borders and to its destination.



Forecast scenarios for passenger traffic, jobs and GDP footprint¹⁰

Air transport market in Ireland is forecast under the "current trends" scenario to grow by 55% in the next 20 years. This would result in an additional 9.6 million passenger journeys by 2037. If met, this increased demand would support approximately US \$32 billion of GDP and almost 171,000 jobs.

	PASSENGERS	US \$ GDP	JOBS
2017	17.4 m	\$20.6 bn	143,117
2037	Current Trends	\$32 bn	170,664
	Upside	\$33.5 bn	178,855
	Downside	\$28.2 bn	150,512

¹ Source: Aviation Benefits Beyond Borders 2018 report (all currency is in United States dollars at 2016 prices).
² Data relates to 2017.
³ Passenger facilitation, one of the Air Transport Regulatory Competitiveness Indicators developed by IATA in 2018, looks at the ease of people moving around the globe and how the governments facilitate this process. It assesses the performance of economies on implementation of open skies agreements, advance passenger information and automatic border control systems and visa requirements.
⁴ Entry visa requirements for a tourism visit from worldwide source markets (10 = no visa required for visitors from all source markets, 0 = traditional visa required for visitors from every source market). Source: WEF, Travel & Tourism Competitiveness Report 2017.
⁵ Based on ticket taxes, airport charges and VAT (10=low cost, 0=high cost). Source: WEF, Travel & Tourism Competitiveness Report 2017.
⁶ The IATA Air Trade Facilitation index (ATFI) measures the extent to which a country facilitates air cargo through its customs and borders processes and regulations. The IATA E-freight Friendliness Index (EFFI) assesses the actual penetration of electronic transactions and documents in air cargo shipments (Value of Air Cargo 2016 report).
⁷ The Enabling Trade Index (ETI), developed by the World Economic Forum, assesses the performance of 136 economies on domestic and foreign market access; border administration; transport and digital infrastructure; transport services; and operating environment. The ETI is featured in The Global Enabling Trade Report 2016.
⁸ Passengers are counted as departures, including connections. The passenger forecasts are based on the IATA 20-year passenger forecast (October 2018). Data on GDP and jobs 2017 are from Oxford Economics. GDP and jobs forecasts are from IATA Economics.
⁹ All data relates to 2018 or most recent unless stated otherwise.

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The Economic Impact of Cargo
Night Flying at Dublin Airport



Freight Transport Association Ireland
Final Report
March 2020



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1. Jobs and Trade: How night flights Support the Irish Economy

Supporting the Irish Economy

- 1.1. **Night flights carry around €19 billion worth of imports and exports every year.** In figure 4.8 we show that night flights carry around €8 billion worth of exports (6% of Ireland’s exports) and around €11 billion in imports (12% of Ireland’s imports).
- 1.2. **Cargo night flying supports €1.1 billion in GDP and 15,000 jobs.** According to a 2019 economic impact study, Dublin Airport supports €9.8 billion in GDP and 129,700 jobs¹. Air cargo night flying alone is a catalyst in driving productivity in Ireland’s trading economy, which is estimated to generate over €1.1 billion in annual GDP, supporting the equivalent of around 15,000 jobs. This clearly demonstrates the value of express freight services, which are reliant on night flying, in supporting the wider economy in Ireland.

€1.1 bn
15,000 jobs
GDP and jobs supported in Ireland’s trading economy by cargo night flying at Dublin Airport

38%
of Dublin’s Air Freight is Flown at Night

1.3. **Night flights are a key pillar of ‘Ireland plc’.** They allow Irish business to send financial, legal or business documents, critical manufacturing components, perishable produce, urgent consumer goods or even time critical medical or pharmaceutical products over night to arrive the next day. In Section 2 we show why without those flights it simply wouldn’t be possible to connect these goods with the USA, with our European neighbours or with the rest of the world in a timely way.

1.4. **Night flights are central to supporting high value manufacturing exports.** In Section 4 we show that over 80% of the freight handled at night in 2018 was imports, with the early morning arrivals mainly operated by express freight airlines, accounting for around 28,500 tonnes. These sectors typically source most of their components from overseas, process them in Ireland and then export them back out to the rest of the world.

€19 bn
value of air freight carried on night flights at Dublin each year

- 1.5. **Night flights are vital for some of the fastest growing sectors in Ireland.** Section 3 looks at the range of industries supported by night flights. For example, Ireland is currently in the midst of a “Pharma Boom” that is driving a surge in exports and Foreign Direct Investment. Ireland now houses all of the top 10 global pharmaceutical companies and 13 of the top 15 global medical devices companies. These types of companies regularly ship temperature sensitive goods that need fast, time sensitive deliveries to arrive the next day. Without night flights this simply couldn’t happen.
- 1.6. **Air cargo night flying is only used when there is no alternative.** Section 2.6 shows shipping goods that require night flights carries an expensive premium. Companies pay that premium because it is essential for the operating of their business that these goods can be picked up at the end of the working day and move quickly to arrive the next day. This is particularly important for goods going to the EU where the working day starts one hour earlier than in Ireland because of the time difference.

Supporting Dublin and the Local Economy

- 1.7. **Night flying supports jobs and GDP in Dublin** – Table 6.1 shows that Cargo night flying at Dublin Airport directly supports around 330 jobs and €27 million in GDP each year at Dublin Airport.
- 1.8. **Night flights take pressure off local infrastructure.** Section 2 shows that flying at night often means that airspace and airport infrastructure is less congested, as is the road infrastructure around airports. This enables greater speed, efficiency and

€27 m
330 jobs
GDP and Jobs directly supported at Dublin Airport

¹ InterVISTAS Consulting for daa – Global Reach National Success, Dublin Airport Economic Impact Study 2019.

reliability of processing. All of which are essential elements of the service that is being delivered.

- 1.9. **Freight flown at night now accounts for 38% of the total freight volumes at Dublin airport** and around 63% of night air cargo is transported by express freight operators primarily shipping time sensitive goods. In Section 4 we show that night flying is an essential part of the air cargo market at Dublin and is necessary for express services that can collect at the end of a working day in time for next day delivery.
- 1.10. **Air cargo shipped via Dublin Airport represents 35% of the value in Euro of all Irish freight.** The Irish National Aviation Policy published in 2015 identified that while air freight accounts for just 1% of total freight tonnage, it accounts for around 35% of the value of all freight shipped to / from Ireland. This suggests that a tonne of air freight could be 53 times more valuable than a tonne travelling by any other mode. This supports jobs in the wider national Irish economy and ensures Irish businesses can compete on the global stage.



A Sustainable and Responsible Industry

- 1.11. **Committed to a sustainable approach.** The freight industry as a whole is committed to a sustainable approach and has consistently proven that it can fly responsibly at night.
- 1.12. **Investing in newer, quieter aircraft.** In recent years there has also been significant investment by freight carriers in the latest aircraft with the lowest noise profiles and lower carbon emissions, because the industry recognises that it has a responsibility to local residents as well as to providing an excellent service for Irish and international businesses.

The Balanced Approach

- 1.13. The international approach to aircraft noise management is based on the ICAO Balanced Approach. At its core it is based on the principle of sustainable development, allowing development of air travel while balancing the impact on the acoustic environment. It makes clear that the noise situation at each airport is unique and there is no one size fits all solution.
- 1.14. As we begin a new decade, modern aircraft are both quieter and more vital to the functioning of our economy than they were even 10 years ago. With an estimated €1.1 billion in GDP at stake from cargo flying along, the future of Ireland's economic growth relies upon continued support for a sensible and balanced night flights regime.

2. Introduction

- 2.1. Dublin Airport is one of the most important economic drivers for Ireland, providing the global connectivity that supports the country's international economy. It is a gateway for business travel, tourism and, importantly, it is a vital port for the shipping of goods and packages. An economic impact study undertaken for daa, previously Dublin Airport Authority, in 2019 estimated that the airport supported almost €9.8 billion in GDP and around 129,700 jobs².
- 2.2. Shortly, Dublin Airport will take a major step forward in terms of its future growth potential and ability to drive economic growth. The new North Runway is due for completion in 2021. This will relieve the existing capacity constraints at the airport and secure the ability to grow in the future. However, there is a significant caveat to this good news. Currently, the operation of the airport post opening of the North Runway will be subject to two planning conditions that have the potential to significantly impair the airport's ability to deliver growth and support the economy:

"Condition 3(d) prohibits use of North Runway for landings and take-offs between the hours of 11pm and 7am.

*Condition 5 states that, on completion of construction of the new runway, the average number of night time aircraft movements (during the busy summer period) at the airport shall not exceed 65 per night (between 11pm and 7am)."*³

- 2.3. These two conditions will significantly limit Dublin Airport's ability to operate at night and, in fact, would result in a reduction from the current levels of night time operations. In summer, daa estimates that there are around 100 aircraft movements each night^{4,5}. The planning conditions as they stand would, therefore, require a reduction in night movements of around 35% in this period. This would have significant implications for both passenger and cargo airlines operating at the airport. Both groups are reliant on night time operations to enable them to support their business models.
- 2.4. In this context, this report examines the importance of night flying to cargo operations at Dublin Airport before moving on to estimate the economic impact of these operations on the Irish economy. The analysis focusses particularly on express freight services⁶, such as those provided by the main integrators⁷: DHL, Fedex, TNT and UPS. The customers of these airlines are heavily reliant on their being able to operate at night to facilitate the provision of the high speed / next day delivery services (both to and from Dublin) that modern, developed city economies rely on to maintain their competitive positions as locations for global companies trading goods and services⁸ in key sectors such as pharmaceuticals, financial and business services, IT and agri-food.
- 2.5. Currently, we estimate that freighter aircraft movements account for around 7% of night movements. If passenger movements carrying bellyhold freight⁹ are included, the number of freight related movements increases to around 24% of night movements. It is, however, the intensity of use of the night period that starts to demonstrate its importance to freight airlines. Only around 13% of passenger aircraft movements are in the night period at Dublin.

² InterVISTAS Consulting for daa – Global Reach National Success, Dublin Airport Economic Impact Study 2019.

³ An Bord Pleanála Reference Number: PL 06F.217429. Planning Conditions. Available at: https://www.dublinairport.com/docs/default-source/planning/planning-conditions.pdf?sfvrsn=ff46e534_0. (Accessed: 15/1/2020).

⁴ The night period is defined as between 23:00 and 07:00.

⁵ Some commentators have suggested that this number may now be closer to 115.

⁶ Operators of freighter aircraft can broadly be divided into two segments: express freight operators (sometimes referred to as integrators), which includes DHL, Fedex, TNT and UPS, who focus particularly on next day and time definite, 'door to door' services, and traditional cargo airlines, which use dedicated aircraft to move items around the world quickly, but do not generally have the same focus on next day delivery or time definite services. It should be recognized that the dividing line between these segments is not precise but it provides a helpful broad distinction.

⁷ Integrators are a particular type of freight company that offer time definite, door to door deliveries. They provide or procure for the customer all parts of an item's journey from door to door, thereby providing a seamless service.

⁸ It is sometimes forgotten that service firms, such as those in financial or business services, remain heavily reliant on express package services to operate given the continued requirement to physically move for instance contractual, financial or legal documentation.

⁹ Bellyhold freight is that carried in the holds of passenger aircraft operating what are primarily passenger services. Again, it should be recognized that there are overlaps with other air cargo segments, notably express freight operators, which often use bellyhold capacity to move items where this option offers a more efficient solution than using their own aircraft.

However, over 50% of the aircraft movements by the express freight operators at Dublin occur in the night period and around 40% of those by other air freight airlines. This begins to articulate the particular importance of the night period to cargo operations.

2.6. This analysis also needs to be viewed in the context of the UK's upcoming departure from the EU. Recent research by Copenhagen Economics for the Department of Business, Enterprise and Innovation¹⁰ has highlighted the significant potential negative effects of BREXIT on key trading sectors of the economy, a number of which are heavily reliant on air cargo services. Disruption to night flying at Dublin Airport can only worsen the position for these sectors that will already face challenging times as Ireland's economy transitions through the BREXIT process.

2.7. This report is structured as follows:

- ➔ in Section 3 we explain why night flying is important to cargo operations;
- ➔ in Section 4 we outline how air cargo and night flying supports prosperity in the economy;
- ➔ in Section 5 we provide more information on the cargo market at Dublin Airport currently and the role of night flying;
- ➔ in Section 6 we consider the economic impact of air cargo night flying on the Irish economy;
- ➔ in Section 7 we set out the conclusions from our analysis.

¹⁰ Copenhagen Economics - Ireland & the Impacts of Brexit: Strategic Implications for Ireland Arising from Changing EU-UK Trading Relations, 2018.

3. Why is Night Flying Important for Cargo Operations?

3.1. In this section, we explain why night flying is so important to the business models of air cargo airlines. We focus particularly on the express freight operators as it is for this group that the night is perhaps most crucial. However, the broad arguments remain the same for other air cargo segments bearing in mind that almost all air freight is to some degree time sensitive.

Air Cargo Operations

3.2. Air cargo is generally used to move mission critical, high value / time sensitive goods and packages. This is especially true of cargo flown at night. The night period is used to move items whose value is to a significant degree defined by their speed and / or certainty of delivery and for whom international delivery times need to be measured in hours rather than days and guaranteed delivery times and next business day delivery are key features of the offer. This could mean essential time expiring medical or pharmaceutical products, financial, legal or business documents, critical manufacturing components or spares, perishable produce or high value consumer goods. The night provides vital time between business days when goods / packages can be moved with minimal loss of productivity or time to market or user.

3.3. Services that use night flying are often referred to as express or priority services and are offered by a wide range of operators in the market. If the delivery timeframes offered by these services cannot be met impacts can be very high. For instance:

- some items may become degraded or unusable, such as clinical samples, time limited medical products or perishables, leading to knock on consequences ranging from financial losses to delayed or aborted treatments for life threatening illnesses;
- sales windows on perishable items may be shortened, meaning that the likelihood of sale is reduced and waste increased, ultimately leading to higher prices;
- production lines may be halted as components, spares or supplies are held up leading to delays and significant costs for manufacturers, operators and end users;
- deals may fail as essential legal and financial documents cannot reach their destinations in time.

3.4. It is a feature of the market that the economic cost of delay or failure to deliver can be disproportionate to the measurable value of the individual item.

3.5. Over the past 20 years express freight services have grown substantially faster than general air freight, reflecting the increasing integration of global financial markets and global supply chains, continued growth of 'just in time' processes, and the rise of time sensitive business to consumer (B2C) shipping.

Why is Flying at Night So Crucial?

3.6. Shipping cargo by air is more expensive compared to other modes of transport and the express or priority freight products associated with night flying are offered at a premium to standard air freight services. Air cargo night flying is only used by shippers and operators when there is no alternative:

- as we have described above, the night hours are needed to move items to meet the deadlines inherent within the express services on which shippers rely. Items often need to be picked up at the end of the working day in the country of origin and then delivered as early as possible the following day to enable companies to maximise productivity. The night is the time available to transport items to meet these types of deadline. Flying is the only way to cover the distances necessary. Trucking is simply too slow in the great majority of cases. It is ultimately a case of being able to fly at night or not being able to offer the service;

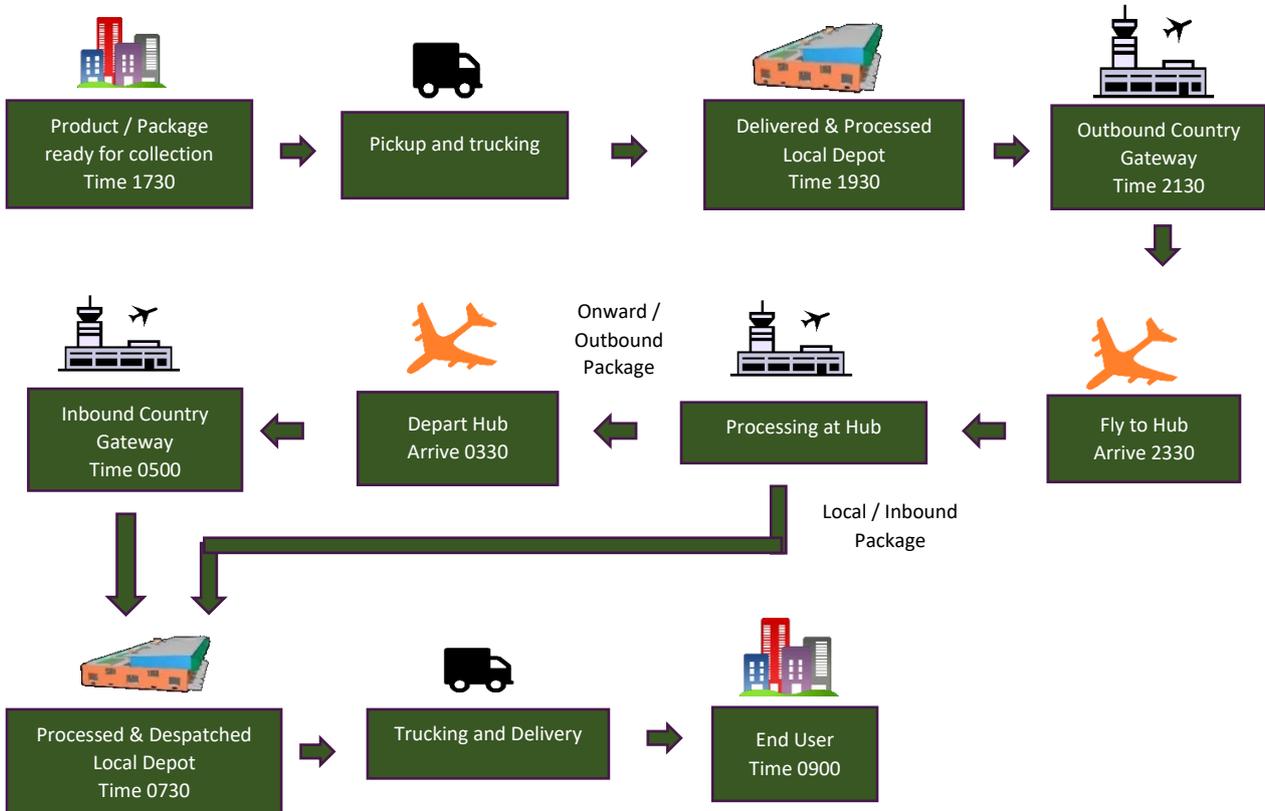
- night flights cannot simply be retimed. The ability of the express freight operators to offer next day and priority services is reliant on a global hub and spoke network similar to that used by the major network airlines¹¹ for passenger air services. This is based on meeting a system of late pick ups and early deliveries and on waves of arrivals and departures that enable packages to make connections at key hub airports. Passenger airlines offering bellyhold capacity have similar issues around their hub and spoke networks, with the added complication of having to also satisfy the timing requirements of their passengers. It is therefore not possible to simply retime services to be just before or just after the night periods as this would severely damage the integrity of the broader network. The only course of action open to freight service providers is to accept that air is no longer an option for express services and that delivery will take at least 24 hours longer. In these circumstances it becomes more cost effective to truck freight to and from the continent or perhaps UK airports and end users must accept the loss of service and productivity;
 - flying at night often means that airspace and airport infrastructure is less congested (as indeed is the road infrastructure around airports). This enables greater speed, efficiency and reliability of processing. All of which are essential elements of the service that is being delivered.
- 3.7. Express / priority cargo services are about fine margins and speed. Downgrading the system at any point means that it will not work. If the operators could not use night flying to / from Dublin, then the express operators' global network of operations will not be changed to accommodate restrictions at Dublin Airport. Dublin will simply become an offshoot that is served differently and at a lower level of service, probably involving trucking freight to destinations within Europe or at least to a European airport to be flown, with consequent impacts for shippers and purchasers from the time lost.

How an Express Package is Moved

- 3.8. Express / priority cargo services to / from Dublin are one of the factors that enable the city to be a successful global economy and an attractive place to invest despite its geographic location on the on the edge of Europe. These services allow companies trading with or from Dublin and the surrounding areas to move products and documents quickly and efficiently using next day and guaranteed delivery services.
- 3.9. Figure 3.2 shows an example of a typical intra-European express freight delivery. It shows clearly how the night is essential as the only time available to actually move the cargo. During the day items are being produced by the originator and picked up or they are being delivered. The diagram reflects primarily an express freight type operating model. However, the fundamental point remains the same across all business models. The night is the time when goods and packages can be moved with minimal loss of productivity in the wider economy.

¹¹ For instance IAG, Lufthansa, Air France / KLM or Emirates.

Figure 3.2: The Journey of a Typical Express Freight Package



Particular Issues for Dublin and Ireland

3.10. In Dublin’s particular case there are three further factors that make night time air cargo operations even more important:

- ➔ geographic location – as we have already alluded to above, Dublin’s location on the geographic edge of Europe creates additional challenges if express freight operators are to maintain their service standards around next day and guaranteed delivery times to / from Europe. The sheer distance between Dublin and the rest of Europe means that there is an even shorter time window in which to operate than in many other European countries. Night flying is essential;
- ➔ island location – linked to the above, Dublin is ultimately on an island. Meeting the required deadlines for the delivery network therefore means flying. No other mode is able to offer the necessary speed. In some circumstances, trucking can actually be faster than flying. However, this is not the case for Ireland;
- ➔ time zone – Ireland is one hour behind much of Europe. This means that any express shipments to Europe are always operating behind other countries. This further truncates the time that express freight operators have to deliver, making the night hours even more crucial. By the time it is 07:00 in Dublin, it is already 08:00 in Europe and people are awake and at work.

4. Why Air Cargo Night Flying is Important to the Economy

4.1. Ultimately, air cargo night flying and the services it enables are about productivity. Air cargo night flying allows the Irish economy to function more efficiently, allowing individuals and companies to add more value, using the ‘dead’ time at night to either move goods to market or to bring supply chain components to Irish based companies or to bring time sensitive goods to end users.

4.2. In other words, air cargo night flying:

- enables trading relationships, allowing Ireland based companies to enter global markets more effectively and enabling overseas companies to trade in Irish markets, providing choice and competition across a whole range of markets. It essentially makes distance less of a factor in trading relationships;
- makes Ireland a more attractive place to locate and do business, thereby helping to attract foreign direct investment (FDI). The availability of express and priority freight services supported by night flying means that companies can invest secure in the knowledge that products, supplies or documents can be moved quickly and efficiently around the globe from their Irish base. Importantly, in a competitive marketplace for FDI, it also means that the Ireland is not behind other locations;
- supports advanced logistics and supply chain functions, supporting the needs of manufacturers in a wide range of sectors and minimising the need for companies to hold inventory;
- means that Irish based companies can provide the highest levels of customer care and after sales service, providing products and spare parts with the minimum delay;
- from an Irish consumer point of view, air cargo night flying supports consumer choice. Enabling rapid delivery of products to market from all over the world.



4.3. These factors make Ireland more productive through the ability to develop comparative advantage, to access knowledge and technology and through the ability to compete on level terms globally. It is therefore one of the reasons why Ireland today ranks 7th on the IMD World Competitiveness Ranking¹² overall (2nd in the EU) and 3rd in the world in Business Efficiency (innovation, profitability and responsible businesses), whilst other European counterparts are slowly dropping.

Which Parts of the Economy Use Air Cargo Night Flying?

4.4. It is possible to identify in general terms some of the key economic sectors for which express services are important and in broad terms the nature of products that are shipped on night flights. The evidence base for this assessment comes from discussions with a number of airlines participating in the study and a range of previous research around night flying and express freight services:

¹² IMD World Competitiveness Yearbook, 2019.

- **Pharmaceuticals & Healthcare:** a substantial proportion of express freight users by value are businesses involved in the pharmaceutical, healthcare and biomedical industries. Many of these freight users ship temperature sensitive goods that need rapid deliveries and require time definite guarantees. Some of the pharmaceutical firms also undertake clinical trials, which increases the necessity for express delivery. Ireland is currently experiencing a “Pharma Boom”, where a large presence of pharmaceutical, healthcare, biotech and medtech companies is driving a surge in exports and FDI. All of the top 10 global pharmaceutical companies now have bases in Ireland¹³ as well as 13 of the top 15 global medical devices companies.
 - **Machinery and Transport Equipment:** the manufacturing sector has been transformed over the past twenty years by globalisation, technology and the growth of emerging markets. Ireland has responded to these fundamental changes by moving its manufacturing facilities and activities up the value chain in order to become the strategic hub of choice for global companies. In addition to the pharmaceuticals and healthcare sectors, there is also a significant presence from advanced engineering and ICT firms. These sectors operate advanced supply chains that draw components from all over the world and also require the ability to ship their products to market quickly and securely. This drives demand for high speed, reliable, time definite services to ensure that manufacturing processes are not disrupted;
 - **Professional Services:** Dublin is a European centre for financial and business services. As such, there is a significant and growing market for package services relating to finance, contract and other legal documents. Even now, physical delivery of key documents and transactions are often required and the ability to move documents overnight reliably to / from other key centres, such as London, New York, Hong Kong, Singapore, Frankfurt or Paris, is of paramount importance. A key example being a large global technology company, which uses express freighters for shipping its internal communications. Also, in the context of service exports, computing services exports accounts for roughly €69 billion and business services exports account for roughly €37 billion;
 - **Agriculture, Fisheries & Produce:** Irish salmon is in demand across the world, particularly the higher value fresh fish, which is highly time sensitive. In order to avoid product contamination, overnight express cargo is required. Irish Beef ranks amongst the top 15 goods export categories worth US \$2bn. Growing trade relations with China and the recent outbreak of swine fever¹⁴, have seen demand for Irish beef has increased significantly and this trend is expected to continue;
 - **E-commerce and B2C enterprises:** As online-retailing rapidly expands, the demand for express delivery also grows, with customers’ growing expectations of rapid delivery from various international suppliers. A report produced by Allied Irish Bank (AIB) identified that there has been a 25% growth in online retail transactions in Ireland between 2017-18 with Dublin accounting for around 30% of these transactions.
- 4.5. Overall, it is clear that large sections of Ireland’s international economy are directly reliant on air freight services and in particular the express freight sector. Restrictions on night flying will damage these sectors over the medium to long term.

¹³ Facts About Ireland – IDA Ireland, 2019.

¹⁴ <https://www.rte.ie/news/ireland/2019/1113/1090484-beef-china/>

5. Cargo Night Flying at Dublin Airport Now

Introduction

- 5.1. In this section, we provide a current detailed picture of the air cargo market at Dublin Airport, including the extent and nature of cargo activity in the night period.

Dublin Airport Freight and the Irish Economy

- 5.2. Dublin Airport is the busiest cargo airport in Ireland and handles around 90% of the country's air freight. In contrast to other airports such as Shannon and Cork, Dublin has experienced rapid growth, from just under 114,000 tonnes handled in 2013 to around 145,000 tonnes in 2018 (a 27% growth over the 5-year period). Table 5.1 outlines the freight volumes handled at various Airports in Ireland.

Table 5.1: International Freight handled by Key Airports in Ireland (Thousand Tonnes)

Airports in Ireland	2013	2014	2015	2016	2017	2018
Cork	0.7	0.7	0.2	0	0	0.1
Dublin	113.5	127.4	137.3	134.2	144.9	143.7
Shannon	13.9	10.9	12.2	12.6	19	13.6
Total Ireland Air Freight	128.1	139	149.7	146.8	163.9	157.4
Dublin Airport (%)	89%	92%	92%	91%	88%	91%

Source: CSO & York Aviation analysis.

- 5.3. Air cargo shipped via Dublin Airport is essential to Ireland's international trading relationships. The Irish National Aviation Policy published in 2015 identified that while air freight accounts for just 1% of total freight volume, it accounts for around 35% of the value of all freight in Ireland. This suggests that a tonne of air freight is 53 times more valuable than a tonne of freight travelling by any other mode. The gap is even greater for trade beyond the EU. Table 5.2 shows the volume and value of air freight as a proportion of total freight in Ireland to countries outside the EU. It accounts for only 0.6% of volume but nearly two thirds of the value. This is reflected in the value per tonne of exports and imports coming through Dublin Airport compared to other modes of transport (see Table 5.3). The value of extra EU exports per tonne using air transport was around €620,000. This compares to around €112,000 per tonne for the next nearest mode, road. Imports display a similar pattern, with a value per tonne for air freight of around €225,000 compared to a value for the next nearest mode, road, of €43,000 per tonne. It is also worth noting that in regards to trade with non-EU nations, Ireland ships more of its exports by air (64%) than any other EU nation.

Table 5.2: Extra-EU Freight by Volume and Value

Mode of Transport	Volume (%)	Value (%)
Air	0.6%	66.2%
Rail	0.0%	0.0%
Road	0.5%	7.9%
Sea	98.8%	26.0%

Source: Eurostat & York Aviation analysis.

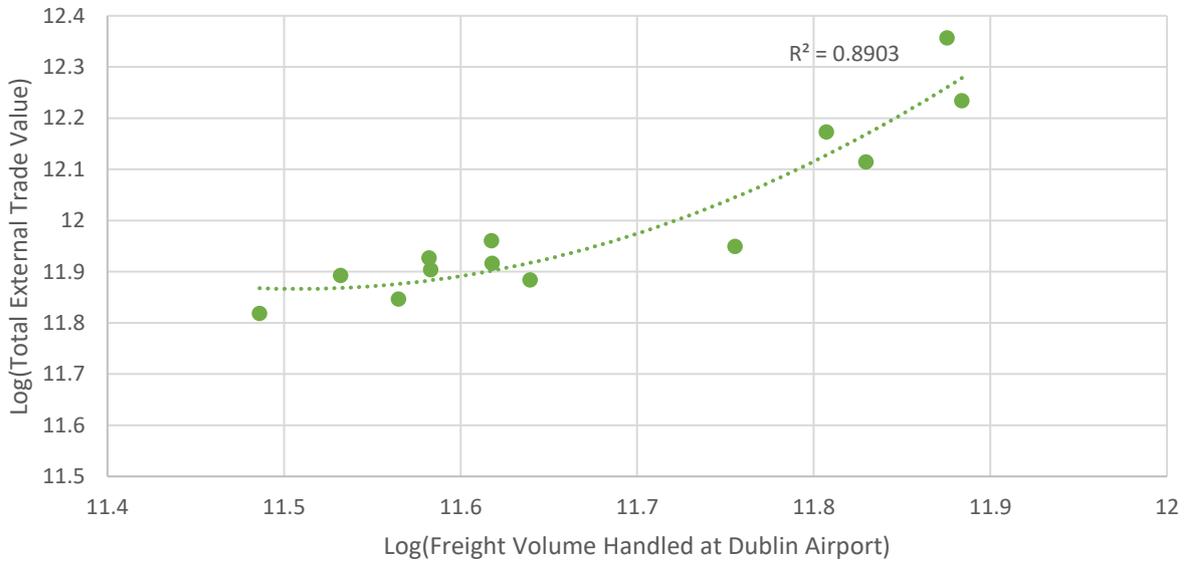
Table 5.3: Extra-EU Freight Value per Tonne

Trade Value per tonne	Exports	Imports
Air	€ 619,925	€ 225,162
Sea	€ 4,478	€ 554
Road	€ 111,727	€ 42,588
Rail	€ 3,649	€ 1,894

Source: Eurostat & York Aviation analysis.

- 5.4. Figure 5.1 below shows the correlation between the volume of international freight handled at Dublin Airport each year and the value of Ireland's total external trade. There is a strong positive correlation between the two and the important role that the airport plays in high value trade can be seen from the upward curve of the relationship.

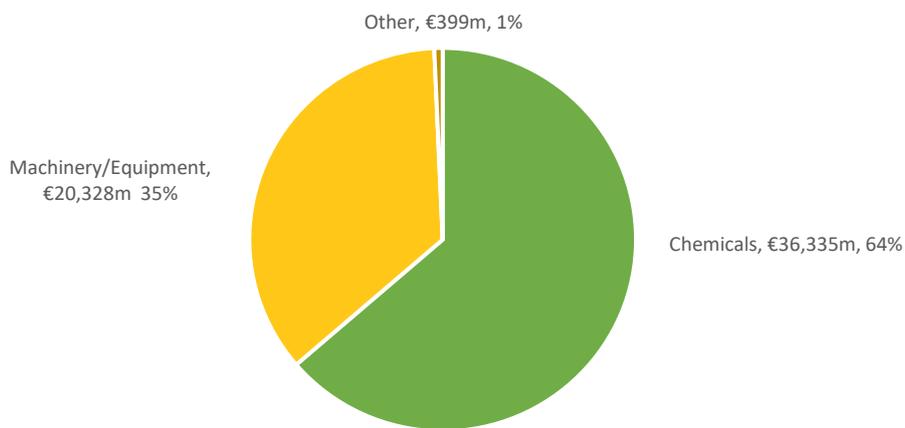
Figure 5.1: Correlation between Freight Volume at Dublin Airport and the Value of External Trade in Ireland



Source: CSO & York Aviation analysis.

5.5. Data from Eurostat demonstrates that extra EU trade at Dublin Airport¹⁵ is dominated by two key high value added sectors of the economy, with chemicals (predominantly pharmaceutical and healthcare products) and high value machinery, such as transport equipment and other manufactured machinery, making up nearly all trade by value between Ireland and countries outside the EU.

Figure 5.2: Irish-Extra-EU Air Trade Value by Sectors



Source: Eurostat & York Aviation analysis.

5.6. It is also important to understand the mechanics of air cargo’s role in supporting Ireland’s trading economy. The core drivers of Ireland’s overall goods exports are the same as those travelling by air. Chemicals and related products made up 55% of Ireland’s total exports by value in 2018, with Machinery and Equipment the next largest category accounting for 17% of value¹⁶. Both of these sectors are also significant importers of raw materials and components. They are part of a trading economy in Ireland that acts as a processor, drawing in components from a global supply chain, adding value and then exporting either finished products or components that are higher up the final value chain.

¹⁵ The same data is not available for EU trade.

¹⁶ Central Statistical Office – Ireland’s Trade in Goods 2018.

- 5.7. This pattern can be seen in Table 5.4 using data extracted from Ireland's Input Output tables published by the Central Statistical Office. These sectors draw the great majority of their inputs from overseas and for all but one the great majority of finished products are then exported. These exports are valued at between 1.5 and 1.9 times the imports required to produce them.
- 5.8. The express freight operations at Dublin Airport are a key part of this picture. Discussions with the key express freight operators have identified the role that their services play in bringing high value and / or time critical components or other inputs through Dublin Airport to support manufacturing or research and development functions across these key sectors. The end products from these inputs are then often then flown onto market on the same services departing from Dublin Airport. These express freight activities are in other words in themselves a key input to Ireland's trading economy and its value chain.

Table 5.4: The Relationship Between Imports and Exports in Key Sector Users of Air Freight

Values in € billion	Manufacture of refined petroleum, basic pharmaceutical, computer, electronic and optical products, machinery and equipment n.e.c., furniture, other manufacturing	Manufacture of chemicals and chemical products	Manufacture of electrical equipment	Manufacture of motor vehicles, trailers and semi-trailers, other transport equipment
<i>Production Inputs</i>				
Domestic	€4.6	€2.4	€0.1	€0.1
Imports	€53.2	€11.2	€0.6	€0.3
Total	€57.8	€13.5	€0.7	€0.4
% Imports	92%	83%	80%	79%
<i>Finished Products</i>				
Domestic Markets	€0.6	€0.4	€0.0	€0.3
Exports	€111.5	€24.3	€1.0	€0.3
Total	€112.1	€24.7	€1.0	€0.7
% Total	99%	98%	99%	49%
Ratio of Export to Import Value	1.9	1.8	1.5	1.6

Source: York Aviation analysis of Irish CSO Input Output Tables.

Cargo at Dublin Airport and Night Flying

- 5.9. Cargo activity at Dublin Airport is dominated by bellyhold freight and the main express freight companies, together accounting for around 94% of the total freight volume at the Airport (see Figure 5.3). The strong connectivity to the USA and the recent growth in long haul services to the east have boosted these volumes.
- 5.10. Night flying is an essential part of the air cargo market at Dublin. Freight flown at night is very important for the Irish economy, it accounts for 38% of the total freight volumes at the airport and is growing.

Figure 5.3: Freight Tonnage at Dublin Airport by Aircraft (2018)

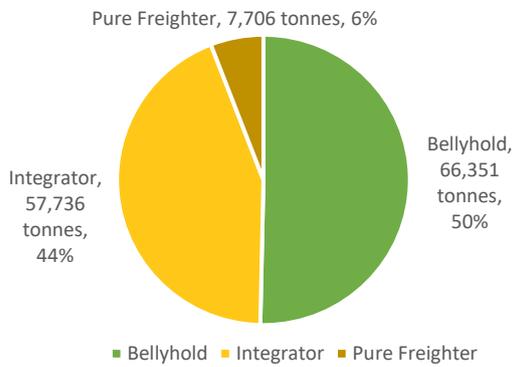
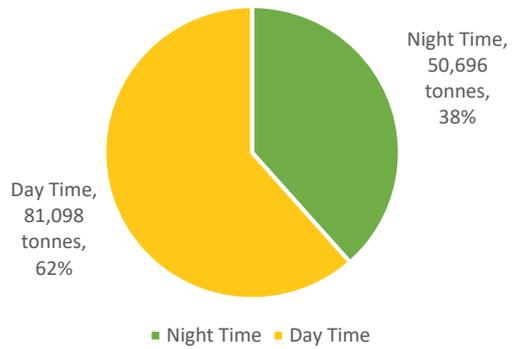


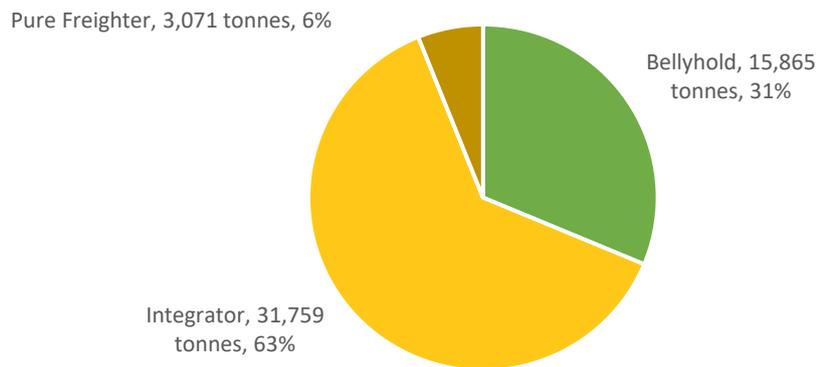
Figure 5.4: Freight Tonnage at Dublin Airport by Time (2018)



Source: DAA & York Aviation analysis.

5.11. Figure 5.5 shows the freight tonnage transported at night through Dublin Airport in 2018 by the different segments of the air cargo market. Around 63% of the air cargo flown at night is transported by the express freight operators, demonstrating the importance of the night to their business model.

Figure 5.5: Freight Volume at Dublin Airport at Night (2018)



Source: DAA & York Aviation Analysis.

5.12. Over 80% of the freight handled at night in 2018 was inbound shipments, with the early morning arrivals operated by the express freight airlines the key driver, accounting for around 28,500 tonnes. The next largest contributor was inbound bellyhold freight.

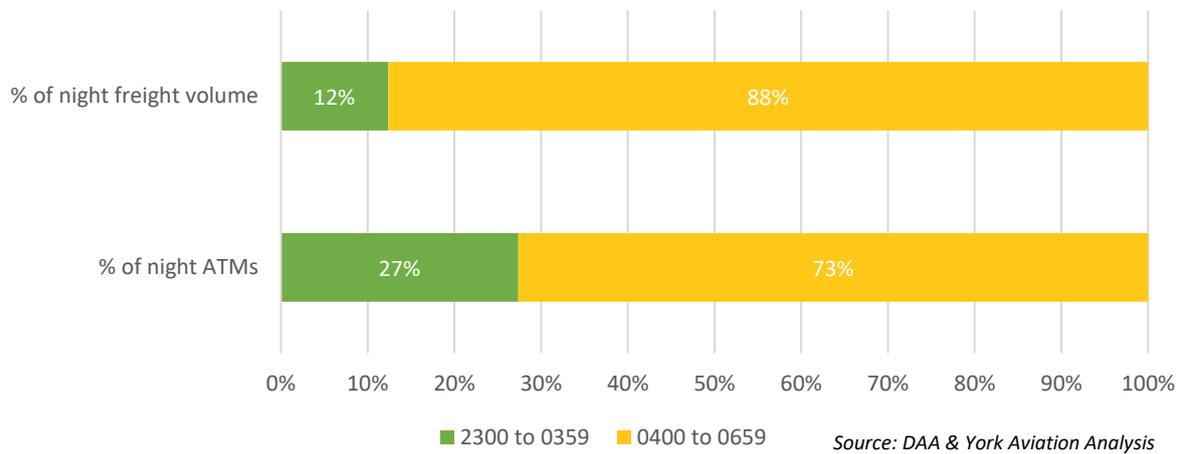
Table 5.5: Night Freight Tonnage by Market Segment and Direction

Night Period	Inbound (tonnes)	Outbound (tonnes)
Total Cargo	40,476	10,220
- Traditional Freighters	65	3,006
- Express Freight Operators	28,564	3,195
- Bellyhold Aircraft	11,846	4,019

Source: daa.

5.13. Figure 5.6 below shows that nearly 90% of the freight handled at night was handled after 0400 and nearly 75% of the ATMs occur in the same time period.

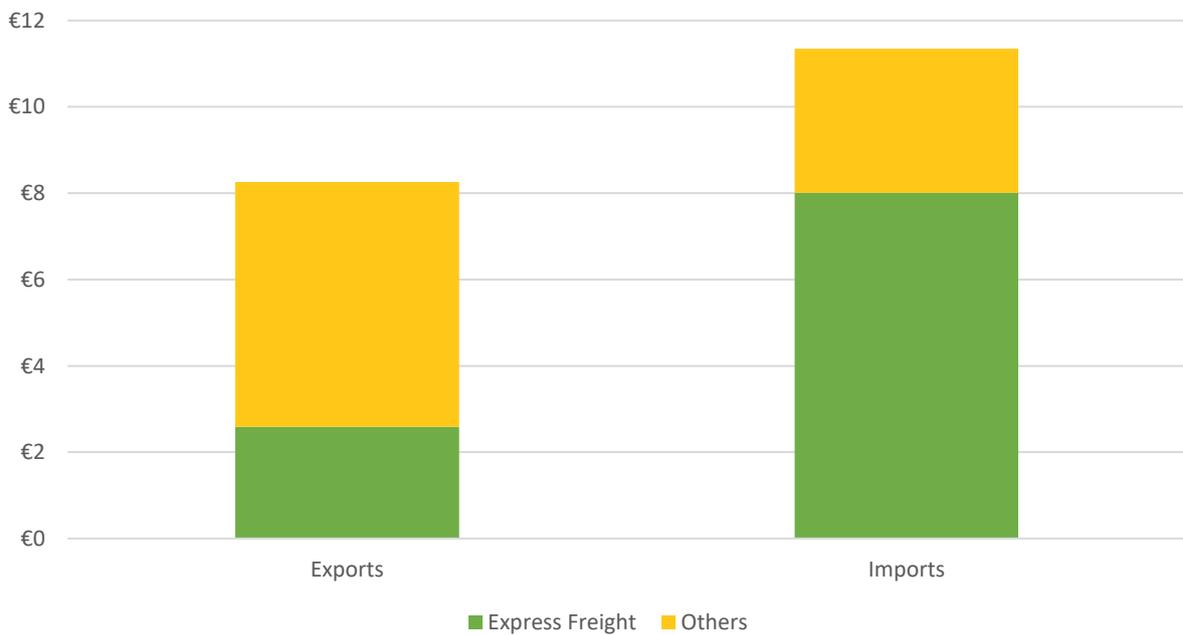
Figure 5.6: Proportion of Freight and Aircraft Movements at Night by Hour



Estimated Value of Trade on Night Flights

5.14. Estimating the value of trade shipped at night via Dublin Airport is highly complex as the data available is limited. However, below we have estimated the value of exports and imports based on available data from Eurostat and daa (see Figure 5.7). This suggests that night flights carry around €8 billion worth of exports (6% of Ireland’s exports) and around €11 billion in imports (12% of Ireland’s imports). Within this total, the express freight operators at Dublin Airport accounted for €3 billion of exports (2% of Ireland’s exports) and around €8 billion of imports (9% of Ireland’s imports).

Figure 5.7: Estimated Value of Exports and Imports Flown at Night at Dublin Airport



Conclusions

5.15. Dublin Airport is an essential trading port for Ireland’s international economy. It accounts for 35% of Ireland’s trade by value. More importantly, the trade facilitated by Dublin Airport is focussed on high value/time sensitive goods. The sectors that use air freight services in Ireland are key, high value added sectors of the economy, such as

pharmaceuticals and advanced manufacturing. Dublin Airport is also the only significant option for airlines seeking to serve the Irish market.

- 5.16. Night flying is an essential element in this market, enabling particularly the express freight sector. Around 38% of the total volume of air cargo at Dublin Airport is flown at night.
- 5.17. The night market for air cargo is primarily an inbound market, dominated by the express freight operators bringing goods and packages to Dublin and the surrounding areas. These shipments are bringing in, particularly, key supply chain components that support high value added sectors of the economy. These ultimately support Ireland's exporting sectors and adds significant value to the Irish economy.

6. The Economic Impact of Cargo Night Flying at Dublin Airport

Introduction

- 6.1. As we have demonstrated above, flying at night is an essential part of the operating model of air cargo airlines operating at Dublin Airport, particularly the express freight operators, and one that cannot be readily substituted, if at all. This night flying is in turn an intrinsic part of the economic value that air cargo operations support in the Irish economy. In this section, we estimate the GDP and employment supported in Ireland by air cargo night flying at Dublin Airport.
- 6.2. The analysis initially considers the employment and GDP supported directly on-site by night time air freight operations at Dublin Airport and the consequent supply chain (indirect) and expenditure of wages and salaries (induced) effects. Together, these three effects have been termed the operational impacts of air cargo night flying. However, importantly, our analysis also moves on to consider the employment and GDP benefits that accrue to sectors in the economy that use air cargo night flying to support their activities. These are referred to as the wider impacts of air cargo night flying.

Approach to Estimating Economic Impact

- 6.3. The analysis uses a number of secondary sources to estimate the current value of air cargo night flying at Dublin to the Irish economy.
- 6.4. The operational economic impacts associated with air cargo night flying have been assessed based on the results of the 2017 economic impact assessment of Dublin Airport undertaken by InterVISTAS Consulting for daa. This research used detailed survey work to identify the direct GDP and employment impact of passenger and cargo operations at the airport, combined with the development of a multiplier based model to consider indirect and induced effects. The research does not specifically identify the economic impact of cargo services at Dublin and certainly does not consider specifically the impact of night time cargo operations. We have therefore estimated the proportion of total workload activity¹⁷ at Dublin Airport that is associated with cargo night flying and used this as a basis to estimate its share of direct, indirect and induced impacts at the airport.
- 6.5. The wider impacts¹⁸ associated with air cargo night flying have been calculated using a different approach as the methodology used by InterVISTAS in their research for daa appears to solely focus on the wider economic effects associated with passenger travel. Our estimates have been derived using an econometric relationship developed by Oxford Economics for the UK economy. The relationship demonstrates that a 10% reduction in the level of business air travel and air freight relative to GDP will result in a 0.5% reduction in GDP. While this relationship was developed for the UK economy, given the similarities and linkages between the Irish and UK economies, it is felt to provide a sensible basis for assessing impacts in Ireland.

Operational Impacts

- 6.6. In Table 6.1 we have set out our estimates of the direct, indirect and induced impacts of cargo night flying at Dublin Airport based on 2018 demand levels.

¹⁷ A workload unit is either one passenger or 100kg of cargo.

¹⁸ These are sometimes referred to as catalytic impacts.

Table 6.1: Direct, Indirect and Induced Economic Impacts of Cargo Night Flying

	GVA (€m)	Jobs
Direct	€ 27	330
Indirect	€ 15	190
Induced	€ 16	230
Total	€ 59	760

Source: York Aviation.

- 6.7. This analysis suggests that cargo night flying directly supports around 330 jobs and €27 million in GDP each year at Dublin Airport. When indirect and induced effects are included, the total impact increases to around €59 million in GDP each year and 760 jobs.

Wider Impacts

- 6.8. As we have described above, air cargo is a vital part of Ireland's trading economy, moving around 35% of Ireland's trade by value, and night flying is an integral part of the service on offer, particularly in relation to the express freight services that are particularly highly valued. This is reflected in our assessment of the value added to the wider economy by productivity effects stemming from night flying. We estimate that at 2018 demand levels, cargo night flying boosted Irish GDP by over €1.1 billion, supporting the equivalent around 15,000 jobs.
- 6.9. It is important at this point to consider the substantial differential between the wider impacts and the operational impacts of night flying. It should be recognised that the primary function of infrastructure services, such as air transport, is to facilitate activity in other sectors and, as a consequence, their value to society is often not fully recognised in the economic value they can generate in their own right (the direct, indirect and induced effects in this context). This is particularly the case for air cargo. Its intrinsic linkage to the functioning of the trading economy means its value stretches far beyond its operational economic impacts.

Total Impacts

- 6.10. Combining operational and wider impacts suggests that air cargo night flying in total supports nearly €1.2 billion in GDP and 15,760 jobs. As we have seen, the great majority of this impact accrues to companies in the wider economy that are central to Ireland's trading economy. The total impact of air cargo night flying is summarised in Table 6.2.

Table 6.2: The Total Impact of Air Cargo Night Flying at Dublin Airport

	GVA (€m)	Jobs
Direct	€ 27	330
Indirect	€ 15	190
Induced	€ 16	230
<i>Operational Impact</i>	<i>€ 59</i>	<i>760</i>
<i>Wider Impact</i>	<i>€ 1,118</i>	<i>15,000</i>
Total Impact	€ 1,177	15,760

Source: York Aviation.

Conclusions

- 6.11. Air cargo night flying has a significant impact on the Irish economy, primarily through the role that it plays in supporting productivity in key trading sectors of the economy. At 2018 demand levels, we estimate that it supported around €1.2 billion in annual GDP and around 15,760 jobs.
- 6.12. The planning conditions associated with the opening of the second runway at Dublin have the potential to significantly damage night time cargo operations, undermining their ability to support this economic value, threatening Dublin's position as a key European business location and damaging infrastructure investments already made by key air cargo operators.

7. Conclusions

- 7.1. Air cargo night flying has a significant positive impact on the Irish economy. At 2018 demand levels, we estimate that it supported around €1.2 billion in annual GDP and around 15,760 jobs. The great majority of this impact (€1.1 billion and 15,000 jobs) comes from the role that air cargo night flying plays in supporting Ireland's trading economy.
- 7.2. Air cargo is generally used to move mission critical, high value / time sensitive goods and packages for which no alternative modes of transport can meet their requirements. This is especially true of cargo flown at night. The night period is used to move items whose value is to a significant degree defined by their speed and / or certainty of delivery and for whom international delivery times need to be measured in hours rather than days and guaranteed delivery times and next business day delivery are key features of the offer. This could mean essential financial, legal or business documents, critical manufacturing components or spares, perishable produce, high value consumer goods or time expiring medical or pharmaceutical products. The night provides vital time between business days when goods / packages can be moved with minimal loss of productivity or time to market or user.
- 7.3. Express / priority cargo services are about mission critical timeframes, fine margins and speed. Downgrading the system at any point means that it will not work. If the operators could not use night flying to / from Dublin, then the express operators' global network of operations will not be changed to accommodate restrictions at Dublin Airport. Dublin will simply become an offshoot that is served differently and at a lower level of service, probably involving trucking freight to destinations within Europe or at least to a European airport to be flown, with consequent impacts for shippers and purchasers from the time lost.
- 7.4. From an economic perspective air cargo night flying and the services it enables are about productivity. Air cargo night flying allows the Irish economy to function more efficiently, allowing individuals and companies to add more value, using the 'dead' time at night to either move goods to market or to bring supply chain components to Irish based companies or to bring time sensitive goods to end users. Through this process, it:
 - enables trading relationships;
 - makes Ireland a more attractive place to locate and do business;
 - supports advanced logistics and supply chain functions;
 - means that Irish based companies can provide the highest levels of customer care and after sales service;
 - from an Irish consumer point of view, air cargo night flying supports consumer choice.
- 7.5. Dublin Airport is an essential trading port for Ireland's international economy. It accounts for 35% of Ireland's trade by value. More importantly, the trade facilitated by Dublin Airport is focussed on high valued goods. The sectors that use air freight services in Ireland are key, high value added sectors of the economy, such as pharmaceuticals and advanced manufacturing. Dublin Airport is also the only significant option for airlines seeking to serve the Irish market. Night flying is an essential element in this market, enabling particularly the express freight sector. Around 38% of the total volume of air cargo at Dublin Airport is flown at night.
- 7.6. We have estimated that night flights carry around €8 billion worth of exports (6% of Ireland's exports) and around €11 billion in imports (12% of Ireland's imports). Within this total, the express freight operators at Dublin Airport accounted for €3 billion of exports (2% of Ireland's exports) and around €8 billion of imports (9% of Ireland's imports).
- 7.7. The night market for air cargo is primarily an inbound market, dominated by the express freight operators bringing goods and packages to Dublin and the surrounding areas. These shipments are bringing in, particularly, key supply chain components that support high value added sectors of the economy and materials and samples for clinical trials and research critical to Ireland's substantial pharmaceutical sector.

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10 YEAR STRATEGY FOR THE HAULAGE SECTOR.

The logo for Dennison Trailers, featuring the word "DENNISON" in a bold, black, sans-serif font. The letter "O" is highlighted in red. A thick red horizontal line is positioned above the text.

DENNISON

DENNISON TRAILERS Maudlins Cross, Naas, Co . Kildare

Introduction –

Dennison Trailers welcome the call by Minister Naughton for all stakeholders to make submission as part of the development of the National Road Haulage Strategy for the next ten years.

As the largest indigenous Semi Trailer manufacturer and number two trailer builder in the UK, we believe this integrated approach is needed. Brexit, general labour market trends and potential regulatory issues are the main factors facing the haulage industry.

We will draw on our extensive knowledge as a supplier of both volume and niche semi-trailer solutions to the Irish, UK and European haulage sector.

This initial document is a sketch of our proposals to the department as part of their consultation and we would welcome the opportunity to discuss this further with the department.

Key Proposals

Designated roads network. – Ireland and Northern Ireland

Under Statutory instrument 146 of 2009 and amendments, Ireland has a designated road network for abnormal and longer vehicles combinations. The permit system for the designated roads works well. However, consideration needs to be given to how we promote the concept of maximising the use of this network.

Three key considerations should be part of the strategic review.

Designated roads need updating

The road network map needs to be updated for motorway and national road infrastructure since 2009. For example, The Tuam-Ennis motorway is not designated yet and this would be a major issue in looking at how to benefit the industry longer term.

A key consideration here is that the Irish Motorway network is now one of the most modern in Europe.

25.25m allowable weights and promoting the combined vehicle concept.

The second consideration is the increasing of allowable weights and promoting the use of longer vehicle combinations.



Illustrative picture of the 25.25m Combined Vehicle system used daily Dublin to Cork.

The new northwest corridor

N2 Dublin Derry/Donegal

The department through the North-South ministerial conference should also engage with the Northern Ireland department for the infrastructure to have the new motorway integrated into a whole island designated road network map and infrastructure plan.

Map of Designated Roads under SI 146 that needs updating for existing and new road improvements including incorporating Northern Ireland.



25.25m and 60 tonne Gross vehicle weight- Proposals

Currently there are five 25.25 metre Vehicle Combinations operating in Ireland. The key part of these combinations is a trailer supplied by Dennison; we believe there are two others operating out of national distribution centre in Athlone.

Currently, these are only allowed operate at 40t gross vehicle weight. 25.25m vehicle combinations require a garda permit combined with a local authority permit for entrance and exit from the designated road network.

We believe that the limit should be increased to 60t to allow for greater flexibility in the use of these vehicle combinations. In particular, the department should follow the Scandinavian approach to the development of the 25.25m vehicle combinations. In particular, the best country for comparison due to similar country size and population is the Danish model. This was developed very practically and with minimal cost for infrastructure improvements.

Please note that 25.25m vehicle combinations are a national competence, there are currently three systems in Europe presently from 40t to 74t gross vehicle weights plus other variations as to driver requirements etc.

In Denmark, from 2010 to the end of 2019 there were 723 25.25-metre-long combination vehicles registered, based on semi-trailers combinations. Of these 400 were supplied by Dennison either directly or through our resellers. The system is now fully legal in Denmark. Other combinations such as dolly-based systems accounted for 300 units.

Summary Key findings – Danish Trials

The key findings in Denmark were -

Modular vehicle combinations (MVC) are long road trains. Two MVC's can transport the same amount of freight as three ordinary trucks.

Studies on the use of modular vehicle combinations point out several advantages in comparison with conventional trucks, for example: reduction of the number of truck transports up to 32% and less congestion,

Moving more freight in less space gives more room in roads and motorways for passenger traffic (co-modality).

Larger efficiency in the transport trade with transport costs lowered up to 23%, and decreased fuel consumption and air pollution by 15%

EMS vehicles typically drive 200-300 km per trip, whereas ordinary trucks normally drive 50-100 km per trip.

The capacity utilisation for EMS vehicles is typically better than for ordinary trucks.

It is found that the introduction of EMS vehicles will not affect the road wear considerably

The use of EMS vehicles will result in savings of DKK 3.21 on the average freight costs per km.

The drivers of the EMS vehicles are generally among the most experienced ones. The drivers do not find that there are any special difficulties, or conditions, related to the use and manoeuvring of EMS vehicles on the dedicated road network.

Northern Ireland use of 25.25m Vehicle Combinations and Designated roads

Baroness Vere of Norbiton has recently commenced a discussion within her department about a trail In England of the 25.25m combined Vehicle concept. While this is welcome and may lead in future to a mutual agreement between England and the Republic.

We believe that the Northern Assembly and ministers have the powers to introduce the 25.25m concept and that within an all-island approach under the north/south ministerial council should look at the combined Vehicle System in the mutual interest of the island. The northwest corridor that is under construction would benefit and should be part of an integrated road network throughout the Island.

From House of Commons library

The devolution of powers relating to transport in Northern Ireland was legislated for in the [Northern Ireland Act 1998](#). Devolution followed the Belfast/Good Friday Agreement in 1998 and also led to the establishment of the North-South Ministerial Council (NSMC), a body intended to address matters of mutual interest, one of which is transport.

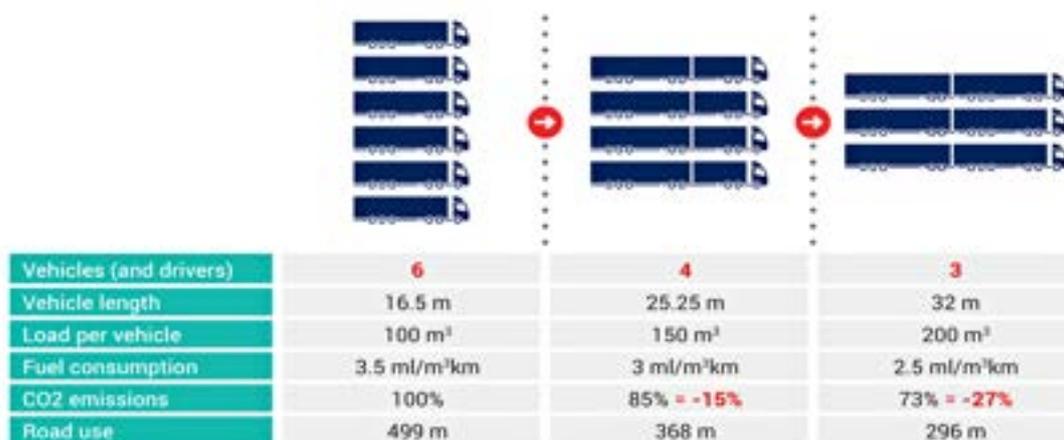
Danish map of designated roads for comparison below



CO2

Initial studies in Denmark did not find a significant CO2 Reduction, but more studies in Germany and by the European manufacturers with the newer engine regulations have found better decarbonisation effects.

3 HIGH-CAPACITY VEHICLES CAN REPLACE 6 REGULAR TRUCKS, REDUCING CO2 BY UP TO 27%



Other advantages of the 25.25m European Modular System.

There are other key considerations that 25.25m combinations have

They are usually used point to point such as from distribution centre to distribution centre.

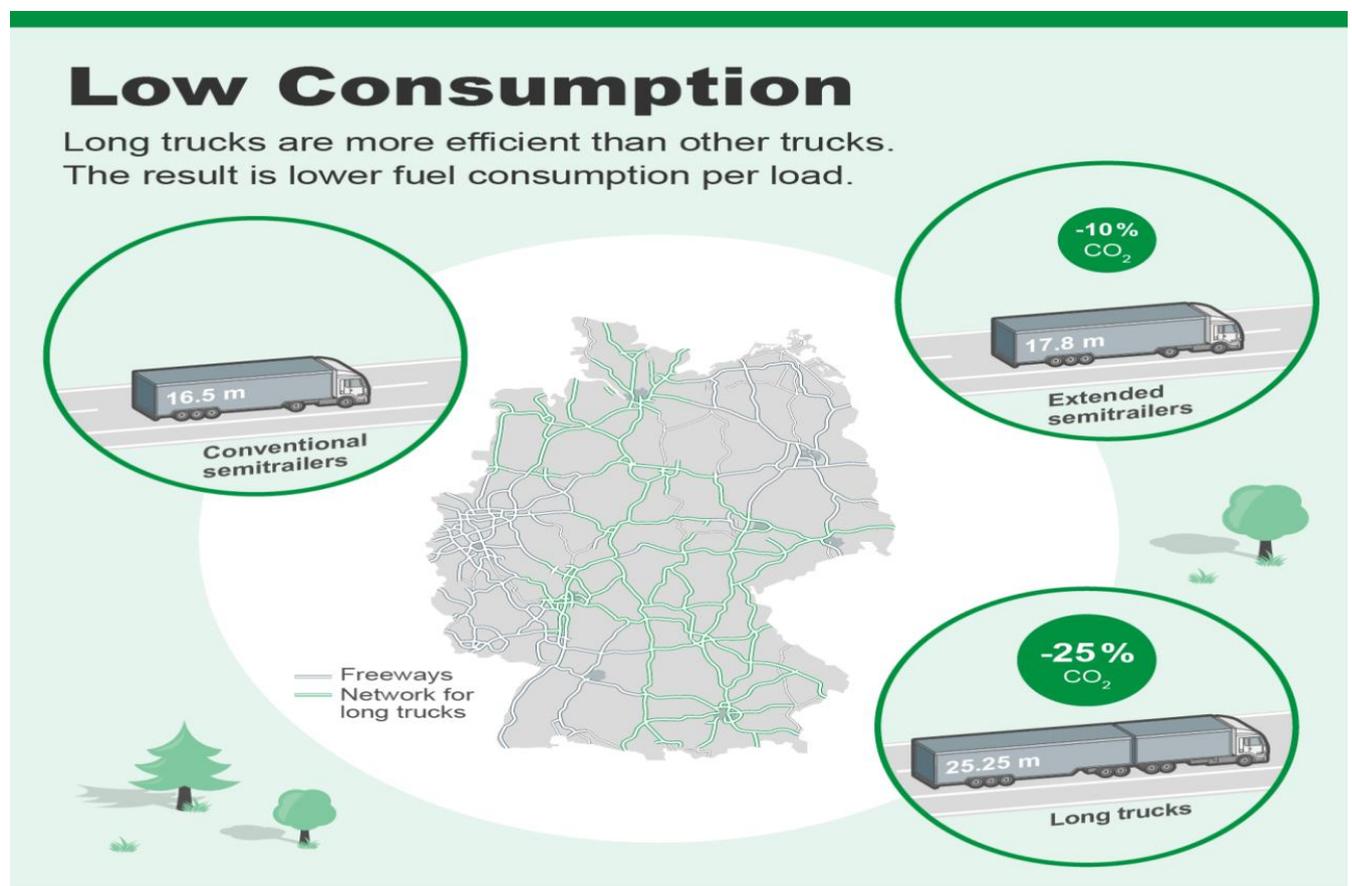
There are less drivers needed and they tend to be more experienced. Given the shortage of drivers, this is a key consideration.

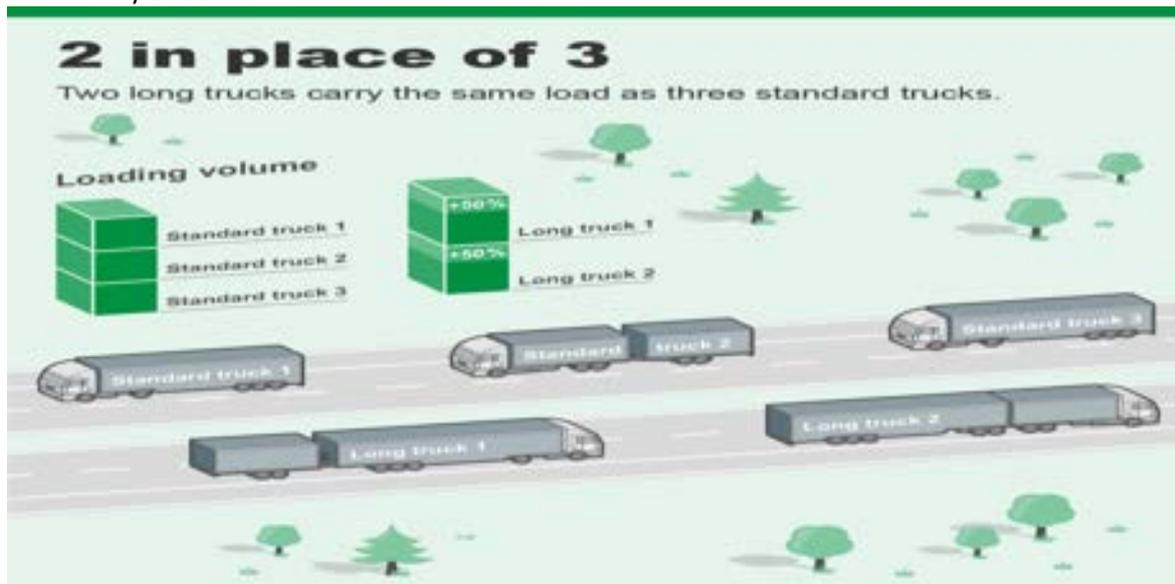
There is less congestion as one truck less is used in every two journeys.

Experience in other countries have shown that there is no negative on rail.

Safety is not compromised.

Diagrams of Benefits of 25.25m below.





Regulatory alignment – The Brexit effect.

The department note that operating margins in the Irish Haulage sector are very low. The age of the national fleet is also noted for HGVs, but this would also apply to the semi-trailer fleet.

With the withdrawal of the UK from The European Union, Significant risk factors in relation to regulatory alignment face the national fleet. The regulatory alignment issues are two-fold

UK/Ireland

Currently, The UK and Ireland are the only two countries that vehicles and their trailers operate at 1250mm ride height and overall height exceeding European norms of 4m. In Ireland Overall height is 4.65m, and in the UK, there is no overall height but up to 4.8m would be seen as the realistic maximum. The 4.8m UK height is generally for light cargo. In addition, all controls are located towards left hand driving conditions. These are for operating within their national territories and between Northern Ireland and the two islands.

The capital cost of equipment is a paramount to having a sustainable road transport sector. In addition, the ability for mutual recognition between the Irish and UK fleets and registration requirements is the single most significant issue facing the Irish Road haulage sector. An example of divergence between standards is listed below. A serious conversation of the implications of this is required.

1st January 2022 – rear underrun protection (Crash bars), The start if Irish and UK non- Alignment?

As of the 1st of January 2022, any new trailer built to operate in the UK or Northern Ireland will have to have a rear underrun that complies to regulation 58.02, meaning a strength of 10t in the middle weakest point. This has been the norm for several decades.

The trailers for the republic will have to have crash to regulation 58.03 meaning a strength of 18t at the weakest point in the middle and have increased strengthening at the corners.

Submission by Dennison Trailers to the Dept of Transport for a Ten-year Strategy for the Haulage Sector. July 2021

The effect of this is that trailers cannot be sold from Northern Ireland to the republic or from the UK to Ireland if they are to the UK requirements post January 1st, 2022. This will mean that all trailers going forward for Irish hauliers operating within 26 countries will be more expensive, if further divergence occurs Irish trailers will be less marketable therefore most likely leading to a longer-term aging of the trailer park as they can be sold in the republic. In addition, second hand or new trailers built after September 2021 in the UK trailers to their standards will be no longer be capable of registration in the republic as they will not meet type approval.

We understand that the department, The RSA and NSAI (approvals authority) have a policy that the republic will adapt all type approval requirements for Vehicles and trailers to newer European standards. This is sensible for trailers going to and from the continent with the 4m overall height, right hand driving, the higher level of road deaths per 100000 on the European mainland etc.

We believe under the National Small Series rules for type approval and the Individual approvals, regulatory alignment with the UK and Northern Ireland should be maintained on all type approval requirements. This would be sensible given the common travel area and the level of transport between our jurisdictions.

The UK have a temporary system on type approval and registration till Jan 2022, but the consultation document has not been published yet.

Other Factors

Closure liaison between interested parties.

We believe that the Department should have a consultative committee to bring together the key stakeholders on changes to ensure all voices are heard. These includes manufacturers, the NSAI, RSA and any other parties. We note in the UK that the Department of Transport has appointed a link person between industry and itself to better understand the sector's needs.

Driver and other skills Shortage

Part of the reason for a driver shortage is the burden of new CPC requirements especially for longer term drivers. Increased requirements for stays away from the truck etc have caused people to leave, it is the biggest complaint we get from our customer base. Furthermore, the lack of a standard approach to the training does not assist in staff retention.

Mechanics

We and our customers have struggled to get sufficient staff with the skills for a growing haulage sector. While we have been part of the developments of the new apprentices, this will take years to come to fruition. Consideration may be needed to a fast-track development scheme to maintain skills levels.

Conclusions

We have tried to put together a snapshot of some of the key considerations that we believe should form part of the national haulage sector strategy for the next ten years.

Further consultation and engagement would be appreciated, and we are happy to engage with the department.

Submission authored by

Aidan Kinsella, Chief Executive and David Dennison, Innovation Director.

Information Memorandum on Dennison Trailers.

Dennison trailers based in the Naas are a wholly owned Irish indigenous company. The family have been in the transport business for over 50 years. Currently, we are the largest manufacturer in the republic, and We have supplied an average of 2800 semi-trailers to the UK, European and Irish markets over the last five years.

In addition to manufacturing at Naas, all our R and d and compliance departments are Irish based.

We currently employ 175 personnel in Naas (including our 100% metal processing facility).

We are a key Enterprise Ireland client and are currently undertaking further research and development of the 25.25m vehicle concept and other related projects supported by EI.

Sources

ACEA European truck manufacturers association

VDA German Automobile Association

An Garda Siochana Website

Irish Statute Book

Danish Government Website

House of Commons library

Attachments to follow.

Notes

Respected Department of transportation

Good afternoon and hope you are doing well

Recently I've been through Ten-year Strategy for the Haulage Sector First Consultation Document. For the past 4 months I have been working on my startup to cut down CO2 emissions and to bring work life balance in HGV drivers life. I have a startup idea to reduce long-haul trucking transit time by almost 10 hours.

Long haul trucking is a biggest issue for transportation of freight. In long haul trucking where drivers are expected to spend the night away from home. Sometimes, they stay away from home for days, weeks and months. Once a driver starts his/her journey, they have to stay behind the wheels for hours. Due to long hours of driving, lack of healthy food and unhygienic conditions at truck stops, drivers are suffering from obesity, depression, mental illness, and sexual diseases etc. According to law drivers need to follow a 14 hour rule where drivers have to take 10 -11 hrs rest time at truck stops or road side or shell parking space. Because for this rest time the freight transport from point A to point B reaches late and causes companies billion dollars loss. Furthermore, Idling trucks for 10 - 11 hrs at truck stops costs companies 3 billion dollars per year. Moreover, idling trucks causes greenhouse emissions which is another big environmental concern.

Business Model:

For example, Distance between point A to point B is 1000 miles. According to traditional trucking service it takes 24 hrs to reach point B with 50-60 mph. But according to my startup model, I can reach point B in 14-15 hrs. My startup model is built based on peer-to-peer (P2P) sharing strategy.

If higher officials have free time, I am more than happy to meet and discuss my startup plans and strategies in depth

Regards
Dileep

Submission by Dublin Port Company to the consultation on the *Ten-year Strategy for the Haulage Sector*

2nd July 2021

Introduction

This submission by Dublin Port Company (DPC) to the Department of Transport's consultation on the *Ten-year Strategy for the Haulage Sector* is one of a series of five inter-related submissions which DPC has made during 2021 in support of Dublin Port's Masterplan 2040. These submissions have been in response both to public consultations and at DPC's own initiative as summarised in **Table 1**.

Table 1: Summary of submissions made by DPC in 2021

	Body	Submission	Date	Nature of submission	
1	NTA	Draft Transport Strategy for the Greater Dublin Area	22 nd January 2021	Public consultation	link
2	DEPR	NDP Review to Renew	29 th January 2021	Public consultation	link
3	DCC	Dublin City Development Plan 2022-2028	22 nd February 2021	Public consultation	link
4	Irish Rail	Proposal for a rail freight connection	31 st March 2021	Unsolicited proposal by DPC	link
5	DoT	National Investment Framework for Transport in Ireland	28 th May 2021	Public consultation	link

DPC's objective in these submissions is to achieve coherence and clarity across a range of policy areas to support the objective of Masterplan 2040 to double the capacity of Dublin Port by 2040.

This will require not only the completion of all of the infrastructure project developments envisaged in Masterplan 2040. It will also require policy measures that facilitate efficient access to Dublin Port by HGVs. The ten year strategy for the haulage sector is, therefore, important to DPC.

Masterplan 2040 envisages Dublin Port reaching its full throughput capacity by 2040 at the latest. However, this could occur as early as 2030 if the Masterplan's developmental and operational objectives cannot be fully realised.

With Dublin Port approaching its ultimate capacity in less than 20 years' time, it is necessary already for port development projects to be progressed elsewhere in the country to ensure that there is sufficient capacity in the national port system to cater for growth not only between now and 2040

but also beyond 2040. Large port infrastructure projects can take at least 20 years to progress from concept to completion. With the exception of the Ringaskiddy Container Terminal project, it is concerning that there is little evidence outside of Dublin Port of projects being progressed which will add capacity for unitised freight in the years ahead.

DPC has [elsewhere](#), in the *Dublin Port Post 2040 Dialogue*, analysed the challenge of providing additional capacity at other locations on the east coast in advance of Dublin Port reaching its limit.

The proposed *Ten-year Strategy for the Haulage Sector* needs to support the foreseeable requirements of the national port system.

Unitised freight trends

The great majority of the throughput of Irish ports is moved by HGVs on the national road network. The exceptions to this are small and include:

- Re-export by ship of imports processed in port-based industries such as Whitegate oil refinery in Cork and Aughinish Alumina in Shannon Foynes
- Consumption of imported bituminous coal by ESB in Moneypoint Power Station
- Transit movement by ship of petroleum products in and out of the Whiddy Island storage terminal in Bantry Bay
- Small volumes of containers moved by rail in and out of Dublin Port. This amounted to 9,789 containers in 2020, equivalent to 0.7% of all unitised movements in Dublin Port in that year.
- Lead and zinc ore concentrates moved from Tara Mines to Dublin Port (285,000 tonnes in 2020, equivalent to 4.9% of all non-unitised cargo and 0.8% of all cargo in Dublin Port)

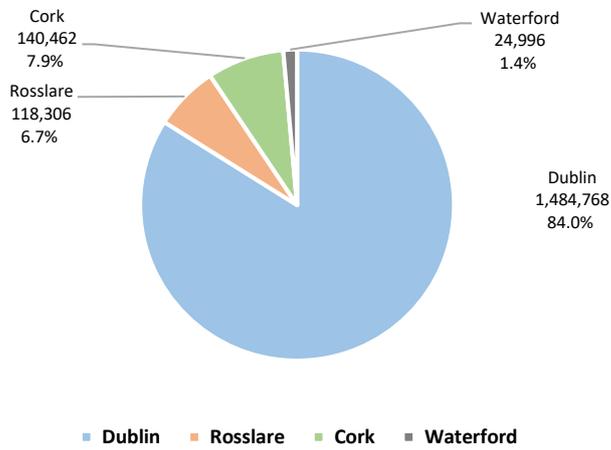
The importance of the haulage sector to Dublin Port and to the work of the national port system is most evident in the movement of unitised goods (trailers and containers) through Irish ports.

Table 2 below shows the distribution of unitised volumes by port in 2020.

Table 2: Distribution of Ro-Ro and Lo-Lo volumes in the national port system, 2020

Units (2020)	Ro-Ro	Lo-Lo	Totals	%	Rail link	Units by rail	% by HGV	% by rail
Dublin	1,060,979	423,789	1,484,768	84.0%	Yes	9,789	99.3%	0.7%
Cork	1,527	138,935	140,462	7.9%	No	nil	100.0%	0.0%
Rosslare	118,306	-	118,306	6.7%	Yes	nil	100.0%	0.0%
Waterford	-	24,996	24,996	1.4%	Yes	nil	100.0%	0.0%
Totals	1,180,812	587,720	1,768,532	100.0%		9,789	99.4%	0.6%

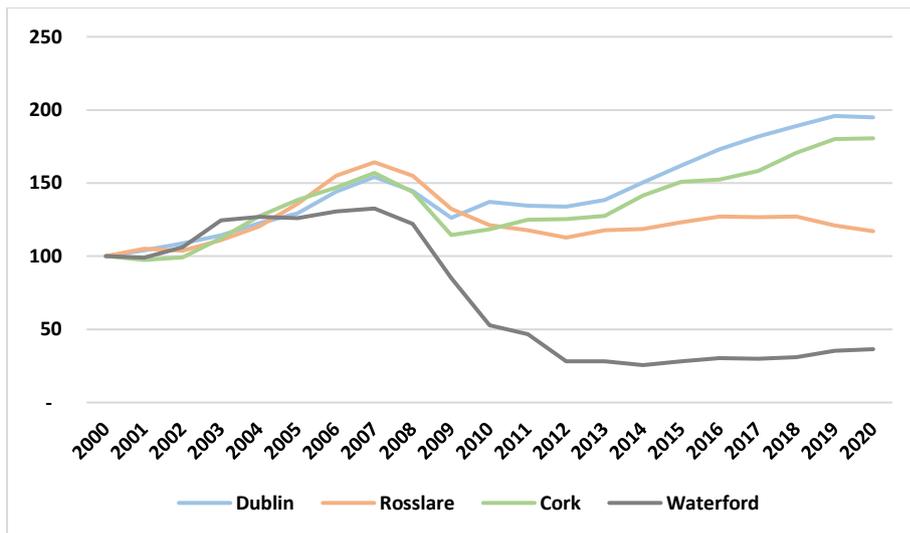
Figure 1: Distribution of unutilised volumes in the national port system, 2020



The large share of unutilised volumes in Dublin Port is a function of geography and is a long-established feature which is not going to change appreciably over the ten-year period of the proposed strategy for the haulage sector.

To illustrate this latter point, the highest rate of growth in unutilised trade among the four ports which handle unutilised volumes has, over the past 20 years, been in Dublin Port (Figure 2).

Figure 2: Trends in unutilised volumes in the national port system, 2000 to 2020



This pattern will persist over the next ten years and beyond and will only alter as Dublin Port begins to reach its maximum throughput capacity some time between 2030 and 2040. As this happens, there will be spill over demand which will drive growth in other ports. At present, the only port which exhibits the strong natural hinterland demand of Dublin Port (both Ro-Ro and Lo-Lo) is the Port of Cork (Lo-Lo only).

The Department's consultation document states that:

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.

DPC believes that Brexit will have little ultimate impact on the distribution of Ro-Ro between Dublin and Rosslare and, already, just six months after Brexit, traditional trading patterns on trade with and through GB are re-establishing themselves. In addition, and notwithstanding considerable publicity suggesting otherwise, the increase in the demand for direct services to Continental Europe has been concentrated in Dublin Port.

What is changing, however, is the proportion of goods moving unaccompanied (in both trailers and containers) from Dublin Port. This is being driven by the large increase in volumes on direct Ro-Ro and Lo-Lo services to the Continental European ports of Cherbourg, Zeebrugge and Rotterdam.

It is very important that the proposed strategy for the haulage sector recognises that volumes of HGV traffic into and out of Dublin Port will increase significantly in the next decade but that the physical capacity of the road infrastructure to support this traffic will not materially increase. This creates a need to manage the demand for road space.

For the haulage sector to fulfil its essential economic role and to do so with the least environmental impact possible, HGVs need to be able to operate on a congestion free motorway network. Road pricing, and specifically road pricing for private cars, is an essential means to manage demand for road space and allow HGVs to operate efficiently. Whereas EVs provide a more sustainable alternative to diesel and electric cars, there will be no alternative to the diesel engine over the next ten years which will similarly provide a zero or low emission alternative. The best that will be achieved is the partial replacement of diesel by gas and a reduction, rather than an elimination, of HGV carbon emissions.

However, the benefits of any increased usage of natural gas as a HGV fuel is likely to be more than offset by an increase in the volume of HGV activity.

Integrated transport planning and intermodal transport

The five submissions we have made in recent times (**Table 1**) seek to achieve integrated planning which allows Dublin Port and the national port sector as a whole cater for the growth in unitised freight volumes in the coming ten years and beyond.

In the case of Dublin Port, we have focussed in these submissions, in particular, on the need to remove the blighting effect of the Eastern Bypass on our plans to provide a road connection to allow the development of port lands on the Poolbeg Peninsula. This issue arises in the preparation of our third and final Masterplan project (the **3FM Project**), a general arrangement drawing for which is attached as **Appendix 1**. This project involves the development of port lands on the Poolbeg

Peninsula and the construction of a new bridge across the Liffey to provide a Southern Port Access Route (SPAR) for port-related HGV traffic.

Elsewhere, we have highlighted the importance of road schemes to improve the hinterland access for Rosslare Harbour¹ and the Port of Cork² so as to enable these ports handle the spill over demand that will emerge as Dublin Port approaches its ultimate capacity. Additionally, it is important for road projects³ which can significantly expand the hinterland of existing ports to proceed so that national port capacity constraints do not emerge before or after 2040.

Elsewhere in the EU, there are intermodal transport options – inland waterways and rail – which provide an alternative to road haulage.

In Ireland, however, there are no inland waterways equivalent to those in, for example, Belgium, the Netherlands and Germany. Moreover, simple realities of geography limit what can be achieved by rail.

Notwithstanding this, Dublin Port has actively promoted the use of rail, most notably by the construction in 2011 of a rail spur to facilitate container rail freight services. However, with increasing pressure on space as cargo volumes increase through the port's fixed footprint, this rail connection will have to be moved in the coming years and, to this end, DPC has proposed a project to Irish Rail (item 4 in **Table 1**) to do this in such a way as to increase port throughput capacity.

In this proposed development, container trains would no longer enter Dublin Port. They would, instead, be worked in Irish Rail's East Wall rail yard where there is a lot of space and multiple rail sidings. The link to Dublin Port would be by a private road bridge across East Wall Road and containers would be shunted over and back across this bridge from and to Dublin Port's three container terminals. The three container terminals are identified in Figure 3 of [Masterplan 2040](#) as follows:

- Area D: DFT
- Area I: DSG
- Area K: MTL

Outside of this development, however, we know of no other proposed projects to increase infrastructure for rail freight.

¹ N11 Oilgate to Rosslare Harbour

² M28 Cork to Ringaskiddy

³ N20 Cork to Limerick

Unfortunately, the container rail freight network that had been constructed throughout the country during the 1990s (as an EU funded project under the *Operational Programme on Peripherality, 1994 to 1999*) was decommissioned and removed after 2005⁴.

In our submission on the *National Investment Framework for Transport in Ireland*, we argued that it is important to ensure that any policy support for rail freight does not create or lead to unrealistic rail freight policy objectives or imperatives which An Bord Pleanála would be obliged to take account of when it completes environmental impact assessments of large port-related Strategic Infrastructure Development projects.

We need to learn from past experience, most notably when Port of Cork's planning application for the development of a new container terminal in Ringaskiddy was turned down in 2008 for reasons including that the development would *...be unable to make use of rail freight carrying facilities in the future and would, therefore, represent a retrograde step in terms of sustainable transport planning (noting references to the potential for rail freight in the Regional Planning Guidelines for the South West Region 2004- 2020 and the Cork Area Strategic Plan 2001-2020)*.

In the context of the *Ten-year Strategy for the Haulage Sector*, it is important that the rail-freight option is presented as a ***nice to have*** option rather than as a policy imperative which promoters of port projects must comply with in proposed schemes.

If this is not made explicit, then there is a risk that essential port projects could meet insuperable planning barriers. Infrastructure projects of all types are already facing challenges at the planning stage and it is important that future policy does not add to this problem.

In conclusion as regards rail-freight, the potential for the increased use of rail freight, is very limited for four obvious reasons:

- Ireland is too small an island with a high population concentration in a small area on the east coast for rail to be economic for freight transport. Economic rail freight operations in Continental Europe typically operate over distances of not less than 500 km. In North America, they operate over thousands of kilometres.
- The national rail network provides a viable option for the modal shift of passengers from cars. However, the more successful transport policy is in achieving this, the less capacity there will be on the rail network for freight.
- The increased use of rail for port-related freight will require expansion of the national rail-freight network. Given the economic and fiscal constraints within which the Department of Transport's nascent *National Investment Framework for Transport Investment* will operate, there will be many more higher priority projects competing for public funds to the extent

⁴ This network included [container gantry cranes](#) in [North Wall](#) in Dublin, [Limerick](#), Galway, Cork (North Esk), Sligo and elsewhere.

that it is not conceivable that projects to support rail freight will deliver any significant additional capacity in the decades ahead.

- Finally, if the container rail freight network installed in the late 1990s with EU grant funding did not succeed and was dismantled by Irish Rail after not much more than ten years, what is going to change in the future to make a similar approach viable?

Digitalisation as a driver to change supply chain behaviour

Dublin Port will reach full capacity some time between 2030 and 2040. One of the factors which could cause it to reach full capacity sooner rather than later is the *under-utilisation of port capacity* by, in particular, the seven unitised terminals in the port.

This under-utilisation arises today for two reasons.

Firstly, the landside movement of goods by HGV is very far from being 24 / 7.

Over the 168 hours in a week, virtually all cargo movements are concentrated into a 12 hour period on weekdays and, even within this 12 hour period, there are early morning and late afternoon peaks. There are almost no deliveries of cargo to or collections of cargo from Dublin Port after 19:00 on weekdays and virtually none at all at weekends. The 108 hours of low or no demand coincide with port tunnel, M50 and general motorway traffic volumes being at their lowest levels. Supply chains will have to change if the combined capacities of Dublin Port, the Dublin Port Tunnel and the national motorway network are to be maximised.

Secondly, the land area of Dublin Port is fixed and the faster cargo moves through the Port, the greater its capacity. Dwell times of trailers and containers need to be greatly reduced. Terminals in Dublin Port provide too much free or low cost storage of trailers and containers. Again, supply chains will have to change to eliminate these systemic inefficiencies.

The requirement to change supply chain behaviour applies to the full range of supply chain operators, notably the haulage sector, and it is important that the ten year strategy identifies this requirement and facilitates it.

Already at the start of this year, there was a requirement to move the working of container freight trains from during the morning and afternoon to post 19:00. Subsequent rapid growth in volumes on direct services to Continental Europe is now requiring a second change of working time to 22:00 or later in order not to affect ship working operations. Ultimately, container freight trains will have to be worked outside Dublin Port altogether as described in item 4 in **Table 1**.

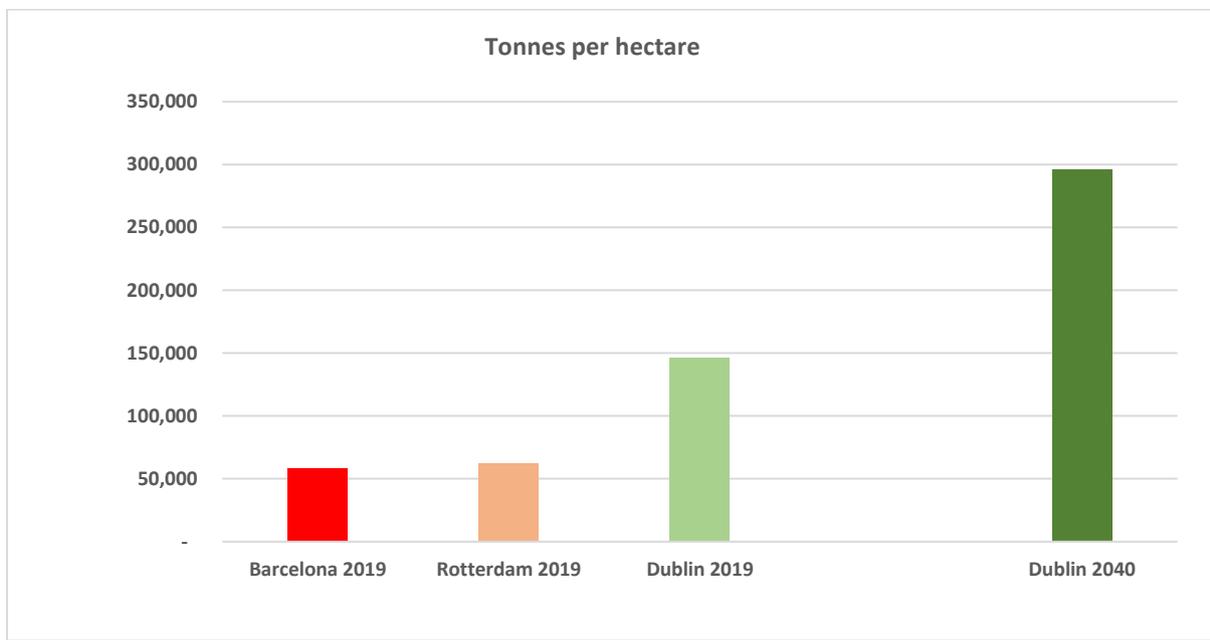
The flexibility that has been required of rail (0.7%) this year will also be needed for the haulage sector (99.3%) if Dublin Port's land utilisation targets are to be met.

The scale of the challenge to meet these targets can be seen in **Figure 3** which shows the land utilisation in Dublin Port in 2019 compared to Rotterdam and Barcelona. In 2019, Dublin Port had a

throughput of 146,000 tonnes per hectare. By comparison, the land utilisation in the Port of Rotterdam was 58,000 tonnes per hectare. In Barcelona, it was 62,000 tonnes per hectare.

To achieve the capacity throughput target of Masterplan 2040, Dublin Port's cargo throughput will need to double to 296,000 tonnes per hectare per annum.

Figure 3: Comparison of land utilisation in the ports of Barcelona, Rotterdam and Dublin



DPC is commencing a digitalisation project which is intended - over a three year to five year period - to fundamentally change the landside demand patterns such that there is a truly 24 / 7 movement of goods by HGV between Dublin Port and a combination of inland facilities (such as DPC's own Dublin Inland Port) and the premises of shippers and consignees.

Digitalisation will be the essential enabler to allow the introduction of variable tariff regimes and booking systems to encourage the required changes to supply chain behaviour in Dublin Port in a similar manner to [PierPASS](#) in the San Pedro Bay ports of Los Angeles and Long Beach. *PierPASS* was introduced in 2005 to spread demand from the haulage sector across the 168 hours of the week at the two ports' 12 container terminals. *PierPASS* operates by a combination of the charging of a *Traffic Mitigation Fee* (of \$33.47 per TEU) for collections of containers during peak hours and the operation of an *OffPeak* programme to manage booking systems for the haulage sector across the container terminals.

Although the relative scale of activity is much smaller in Dublin, the technical challenge here is greater given that Dublin Port is multi-modal and given the very short sea distances to Dublin Port's trading partner ports in GB and Continental Europe.

It is important that the *Ten-year Strategy for the Haulage Sector* explicitly recognises the demand-side challenge for Dublin Port and the wider transport infrastructure system and explicitly endorses DPC's digitalisation project as a means to manage demand from the haulage sector in Dublin Port's seven unitised terminals.

Conclusions

The consultation by the Department of Transport on the *Ten-year Strategy for the Haulage Sector* is timely in relation to the various other recent consultations of the Department itself (NIFTI), of DEPR (on the National Development Plan), of NTA and of DCC.

Dublin Port will reach full capacity within the next ten to twenty years and the required maximisation of the utilisation of Dublin Port's capacity depends on fundamental changes in supply chain behaviour, notably by the haulage sector.

Moreover, the challenge faced by Dublin Port is a national challenge because of the country's huge dependence on Dublin Port and the absence of any alternative but to use Dublin Port's infrastructure more and more efficiently over the period of the proposed haulage strategy and beyond.

Appendix 1 – Preliminary general arrangement of the 3FM Project





CONSULTATION RESPONSE:

**DEVELOPMENT OF A 10-YEAR
STRATEGY FOR THE
TRANSPORT AND LOGISTICS
SECTOR**

July 2nd 2020



etbi

Education and Training
Boards Ireland
*Boird Oideachais agus
Oiliúna Éireann*

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1. Introduction

The purpose of this paper is to respond to a request from The Department of Transport to participate in the consultation process towards the development of a 10-year strategy for the Transport and Logistics sector. It will cover the key areas of:

- COVID-19 19
- Brexit
- Environment/ Decarbonisation
- Road Safety

The Education and Training Board (ETB) sector is recognised as the leading provider of education and training services nationally and is seen as a key actor responding strategically to emerging trends and needs, both nationally and on the international stage. As a vibrant and responsive sector, ETBs currently have a budget of €2.2 billion, has over 32,000 staff, and have responsibility for 27 Community National Schools, 246 Post-Primary School with over 113,000 students, and are the largest provider of education through the medium of Irish with 47 schools including Scoileanna Gaeltachta, Gaelcholáistí, Aonaid Lán-Ghaeilge. Furthermore ETBs deliver Further Education and Training to over 200,000 unique FET learners annually with FET collages and Training Centres playing a pivotal role in the delivery of apprenticeships and traineeships in collaboration with employers and industry partners.

ETBs are funded primarily through the Dept. of Education, and SOLAS. As a collective representative body of all 16 ETBs, ETBI supports the sector, providing, procuring, promoting relationships with relevant bodies and agencies, and coordinating services at national level through three main pillars of Schools, Further Education and Training, and Organisational Support and Development. It fulfils this role through harnessing the expertise and comprehensive skillset of its professional staff both internally and within ETBs, and in doing so, vigorously and ambitiously builds on the fulfilment of its strategic priorities within and on behalf of the sector. In an uncertain future where Education and Training continues to regenerate and build a better future for all age groups, abilities and ambitions, ETBI maintains its focus on prioritising high level delivery of services to people and communities, building strategic partnerships and collaborations, and developing future potential and innovations over the coming years.

2. Labour Market/ Skills

This paper will review current training programmes on offer and make recommendations aimed at improving efficiencies and standards, and helping the sector move to a low-carbon future.

The Education and Training Boards (ETBs) in Ireland offer training in Professional Driving, Warehousing & Logistics and Supply Chain Management across 16 ETB regions. In 2021, 1,195 learners participated in these programmes on a full and part time basis. At the time of writing, almost 600 learners have registered for the remainder of 2021.

Training is fully funded for unemployed persons and certified at QQI Levels 4, 5 and 6 as well as relevant Industry Certification. Upskilling is also provided to those in employment under *The Skills to Advance* programme.

ETB Training Programmes seek to *build skills to anticipate and respond to rapidly evolving regional and national needs*- this has been identified as a key strategic priority in The National Further Education & Training (FET) Strategy.

3. Background

The proposed 10-year strategy for the haulage sector will concentrate on how Government, industry and others can best work together to improve efficiencies and standards in the sector and move to a low-carbon future over the short to medium term. It will address 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.

The Education & Training sector can make a significant contribution to this strategy by identifying, in the first instance, gaps in the training programmes currently on offer and barriers to entry to training in the sector. A comprehensive review has been carried out focussing on the 5 key areas mentioned in the consultation paper and recommendations will be made addressing the additions and modifications that would support the objectives of the proposed 10-year strategy for the haulage sector as well as the key strategic objectives of the National Further Education & Training Strategy 2020-2024.

Training programmes currently offered by the ETB in Transport & Logistics include:

- Heavy Goods Vehicle – RIGID
- Heavy Goods Vehicle Driving – Artic
- Transport, Logistics and Distribution
- Delivery Driver Traineeship

These programmes are full-time, range in duration from 5 weeks to 38 weeks and are fully certified.

Programmes are aimed at school leavers, jobseekers and career changers who wish to gain employment in the Transport & Logistics industry.

4. Methodology

The Research Methodology used to gather the data on which this paper is based, was two-fold.

Training Managers in all ETB regions offering training programmes in Transport and Logistics were surveyed by structured questionnaire covering the 5 key areas mentioned in the consultation paper (Appendix 1). Responses were received from the managers of 6 regions, and it was established that other regions are not running training programmes in this area currently.

In-depth interviews were carried out with representatives of the haulage sector, in which their views were obtained on the challenges currently facing the sector and the specific role that training could play in addressing these challenges in the future.

The findings of both research methods were combined and analysed to formulate a balanced and accurate overview of training in the sector and to make recommendations that will be practical, effective, and achievable and consistent with The National Further Education and Training Strategy 2020-2024 and Government's target of net-zero carbon emissions by 2050.

5. Research Findings

COVID-19

The fact that supply chains for the most part, have remained open throughout the pandemic, is indicative of flexibility and a strong ability to respond by the Transport & Logistics industry, rather than a high level of preparedness for such an emergency within the industry.

As with most key workers who worked through the pandemic, workers in the haulage sector experienced increased workloads and many experienced negative effects on their physical and mental health and wellbeing.

The focus of training programmes currently offered by Education & Training Boards is primarily on technical skills, (i.e. RTITB Forklift Counterbalance, RTITB Forklift Reach Certificate, ADR - Hazard Chemical Training), with little emphasis on Employee Health & Welfare, Infection Prevention & Control, First Aid Response and Digital Skills (Basic digital skills, particular digital skills required for new in-cab and vehicle technology, digital walk around checks, Customer/delivery interfaces etc).

Brexit

A number of changes & challenges to the sector as a result of Brexit were identified:

- New Customs formalities for shipments between EU and UK.
 - Significant delays are still occurring due to incomplete/inaccurate customs documents submitted for consignments. This results in delays at ports with increased labour and fuel costs, tachograph implications and in some cases waste of fresh/ chilled produce. The driver is generally not the person responsible for completion of documentation but is the person most impacted by incomplete/ inaccurate documents.
- Additional costs relating to administration, labelling, and packaging.
- Increased costs and time of direct ferry transport to EU vs. Landbridge.

Environment/ Decarbonisation

It is generally accepted that road travel- personal and freight- is a major contributor to CO2 emissions in Ireland. Transition to low carbon fuel technologies is recognised as the most effective method the sector can adopt in the drive towards a carbon neutral economy by 2050. Awareness of “eco-driving” is considered low among HGV drivers and the term itself is confusing- with an over emphasis on complex environmental issues rather than relatively simple driver behaviours which many drivers practice anyway.

Eco Driving is currently not a certified component of training programmes offered by ETBs. While some element of eco-driving may be an option in some regions, this is largely ad hoc and uncertified.

MSLETB and WWETB are currently piloting a SMART driving programme certified as a QQI Level 5 Certificate in Digitally Assisted Eco Driving (HGV). This 3-day programme seeks to equip the driver with the skills to reduce fuel consumption and reduce emissions. Thereby reducing costs, wear and tear on vehicles, increasing the residual value of the fleet and reducing the carbon footprint of the organisation.

Employers in the sector would support the training and upskilling of drivers in eco-driving techniques as it would reduce costs and lower CO2 emissions, it would also enhance corporate social responsibility.

Road Safety

The overriding road safety priorities are reductions in the numbers of serious injuries and fatalities on our roads. Ireland ranks well in the EU in terms of road fatalities- second safest in 2018, an improvement of 5 places since 2010. Road fatalities in the EU linked to HGV's stands at 15 %. There is significant room for improvement.

The priorities of reduced fatalities and serious injury will be achieved by improved driver behaviour, better knowledge of and compliance with road traffic legislation such as speed, wearing of seatbelts, use of mobile phones and other devices and driving under the influence of alcohol and drugs.

It is generally accepted that the subject of Road Safety is well covered on current ETB Driver training courses, and it is when one becomes a professional driver the lapses in behaviour/ bad habits set in (it should be recognised that the professional driver runs the risk of becoming fatigued or compromising on road safety while adhering to tight deadlines often imposed by the job).

Labour Market/ Skills

One of the greatest barriers to young people in accessing an ETB HGV training course is the requirement to have a full driving licence. Most unemployed young people do not have a driving licence- they are unemployed and as such cannot afford the lessons, insurance, fees etc. Those young people who do have a full driving licence are most likely already employed and as such not eligible for an ETB course.

Education and training is limited in the role it can play in attracting young people into employment in the haulage sector. A range of barriers have been identified including the following:

- Unsociable working hours
- Perceived poor working conditions e.g., inadequate roadside facilities
- High insurance costs for young drivers

6. Recommendations

COVID-19

A number of important and urgent training needs have been identified by this study. While these needs have been intensified by the COVID-19 pandemic, they were not created by it and these components should be core to all Professional Driver Training programmes, so that drivers may be equipped with the knowledge and skills to look after their own mental health and wellbeing and that of those of others with whom they come into contact.

As well as inclusion on new training programmes, this should also be provided to existing employees in the sector under The Skills to Advance programme.

This will lead to a greater level of preparedness for any future emergency affecting the sector, which in turn will build resilience and increase driver confidence in their own ability to effectively cope with the challenges presented.

Proposed additions to programmes should be mandatory and certified, where possible and should include:

1. Infection Prevention & Control (e.g., QQI Level 5)
2. First Aid Responder (PHECC)
3. Employee Health and Welfare

Brexit

HGV drivers should receive basic training on new Customs formalities – limited to providing drivers with the knowledge and skills to deal with the most common errors /omissions in documentation. This would reduce delays and eliminate the frustration felt by drivers as a result of factors currently outside of their control.

Digital skills training (most processes are automated/online) - More extensive training is needed for exporters/ haulage firms to ensure that all documentation submitted is correct in the first instance. Uptake on the training available to date is reportedly quite low, despite the fact that it is free of charge and has been made available online to facilitate ease of access. Further research is required to establish why this is the case, and more promotion of training and incentives to participate may be helpful.

Input from Revenue Commissioners and other state agencies may be appropriate. Haulage firms already interact with these agencies for other purposes and specific training may be seen as a natural extension of the services provided.

The Chartered Institute of Logistics & Transport in Ireland (C.I.L.T) offer a range of programmes on Customs Clearance and VAT and Excise Taxes. ETBs could consider collaborating with CILT to include these programmes on ETB Transport & Logistics Training courses.

Additions and modifications to existing training and testing programmes to incorporate these topics should be implemented on all new programmes.

Upskilling of those already employed in the sector should be prioritised under the Skills to Advance programme, as the benefits will be felt immediately, both for employer and driver.

Environment/ Decarbonisation

Awareness of Eco-driving techniques must be promoted in the sector. Education and Training can play a role by rolling out Eco-driver training as part of all professional driver training provided by ETBs, including traineeships, apprenticeships and upskilling of current employees in the sector.

While certification is generally preferable for training carried out by an ETBs, there is currently no recognised certification for Eco driving in Ireland.

MSLETB and WWETB have developed a SMART driving programme, in collaboration with the Irish Road Haulage Association, certified as a QQI Level 5 Certificate in Digitally Assisted Eco-Driving (HGV). This 3-day programme seeks to equip the driver with the skills to reduce fuel consumption and reduce emissions thereby reducing costs, wear and tear on vehicles, increasing the residual value of the fleet and reducing the carbon footprint of the organisation. Moderating speed, driving smoothly, better observation and anticipation of the situation ahead and traffic flow is also highly correlated with the driving style that reduces accident risk. Digital skills are integrated in the programme delivery.

The SMART Eco-driving is one of a suite of measures that could be adopted in the sector to reduce emissions and the carbon footprint. Others include:

- Alternative fuel sources to diesel
- Integration of alternative technologies into the fleet
- Environmentally friendly routing
- More efficient vehicle utilisation
- Toll charge incentives

While the adoption of these measures are outside of the control of the training sector, greater knowledge of them would certainly contribute to more environmentally friendly driving behaviours and as such, they should be incorporated into training programmes where possible.

Road Safety

It is generally accepted that the subject of Road Safety is well covered on current ETB Driver training courses, and it is when one becomes a professional driver that lapses in behaviour/ bad habits set in. Training, such as the SMART driving programme can change behaviour and reinforce better driving habits as mentioned above.

Therefore, Road Safety training should be particularly targeted at drivers currently employed in the sector, with a strong focus on new legislation, and areas of road safety where compliance is found to be poor. This research suggested that the promotion of good road safety practices and the consequences of poor road safety could be enhanced by the involvement of guest speakers e.g., Emergency Services, victims etc.

As experts in the field, both the Road Safety Authority and The Health & Safety Authority should have an input into the development of training programmes for the haulage sector. As stated earlier, the technical aspects of professional driving are very well served on current training courses offered by the ETB sector. By introducing trainees to these agencies at an early stage in their driving careers, they are more likely to develop a positive and lasting relationship with them.

The state agencies in turn, should provide support to the sector in the form of research, consultation, access to information and ongoing support and mentoring to employers and employees in the sector.

For example, the Road Safety Authority provide a Driver for Work programme and checklist on its website, which should be adopted by employers in the haulage sector -

[Driving for Work Checklist](#)

A strong policy on road safety will allow the employer and driver understand both of their responsibilities with regards to road safety.

The policy should facilitate the identification and assessment of the road safety risks facing drivers and any necessary changes made immediately.

The policy should be updated regularly to take account of changes to the regulatory environment, driver's conditions or workload, new vehicles etc.

A collaborative approach should be adopted to road safety with input from the employer, the employee, and the road safety authorities.

7. Conclusion

The modifications which will be required in Professional Driver training programmes offered by ETBs, in order to make a meaningful contribution to the development of the 10-year strategy for the haulage sector may be summarised as follows:

Extension of Professional Driving training programmes to cover more than technical driving skills i.e., Digital Skills, Infection Prevention & Control, First Aid training. Health & Wellbeing.

Increase awareness of the role of Eco-driving skills for the professional driver. In particular, the contribution of Eco driving to road safety, cost reduction and reduced carbon emissions should be emphasised.

Mandatory Eco-driving training should be included on all ETB Professional Driving programmes.

Enhance the role of State Agencies such as The Revenue Commissioners, The Road Safety Authority and The Health & Safety Authority in the training of professional drivers.

Provision should be made for the delivery and assessment of training online, insofar as this is possible. However, a flexible and differentiated approach should also be adopted to cater for employees with poor digital skills.

Appendix 1 – Sectoral Questionnaire

Covid 19

1. What measures could be taken by the Irish Transport sector in order to be better prepared for any future event such as the Covid 19 pandemic?
2. What amendments/updates to current Transport and Logistics Training programmes would be required to support the measures suggested above?

Brexit

3. What challenges/ changes has the Transport and Logistics sector experienced as a result of Brexit?
4. What additional training is necessary to enable firm/ employees in the Transport and Logistics sector to overcome the challenges mentioned above?

Environment/ Decarbonisation

5. What measures could be taken by the Irish Transport sector to promote better environmental practices in the industry?
6. What additional training could be provided by the Education and Training sector to increase awareness of environmental/ decarbonisation issues and promote more environmentally friendly practices in the industry?

Road Safety

7. Is the subject of Road Safety prioritised in current Transport and Logistics Training courses?
8. Suggest any measures that may improve Road Safety awareness on training programmes.
9. Could Transport and Logistics training programmes incorporate more content from other agencies involved in Road Safety e.g. Road Safety Authority, Health & Safety Authority?

Labour Market/ Skills

10. How can the Education and Training sector encourage more young people to choose a career in the Transport and Logistics sector?
11. Please make specific suggestions in relation to the promotion of greater gender balance in the sector.

Good Morning

Elsatrans as been established as a leading provider of road haulage services to the retail food industry for the last 17 years. We as a company understand the implications and damage caused by diesel fuel emissions. To help counteract this we purchased 2 CNG vehicles in 2019 and wish to expand this further. We will expand and eventually eliminate our diesel fleet provided 2 things happen. Once we have the fuelling infrastructure in place and the reduction in Excise duty kept it is viable for us to continue down the road to sustainability.

Our diesel fleet of 17 vehicles currently covers over 3 million kms a year here in Ireland emitting over 40 tonnes of Co2 per week. Its vital for the environment that we have both sustainable and cost effective not necessarily cost saving but cost effective solutions and options to driver down our CO2 emissions. Elsatrans are also awaiting the 1st demo all Electric Tractor Unit hopefully being delivered as a demo to us by Volvo Trucks UK & Ireland in August. This vehicle will apparently cover up to 300kms on a charge which will fit in with our domestic short haul routes with a zero emission vehicle.

In turn and finally I ask you to keep or even reduce the current excise duty to enable our food road miles to become more environmentally friendly.

Any questions feel free to contact me.

Best regards

Aaron

Aaron McAleenan
Managing Director
Elsatrans Ltd
www.elsatrans.ie



"All business of the Company is transacted under the current edition of the FTA Ireland Conditions for the Storage and transport of Goods in Ireland 2019, a copy of which are available on request. We would refer you in particular to clauses 7 and 10 which limit and/or exclude our liability to you"

Eurotran submission to the Department of Transport consultation on a 10-year Strategy for Ireland’s road haulage sector

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INTRODUCTION

The Department of Transport in Ireland invited stakeholders to contribute to the first phase of a two-phase public consultation, to seek views towards the development of a strategy for the Irish 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.

In its **capacity of an official IRHA consultant, EUROTRAN** would like to make its own contribution to this consultation. The objective is to place the emphasis on several specific issues, from a broad EU perspective, bearing also in mind relevant good practices, which exist at EU and Member States' level and the development in other transport modes. Eurotran appears under the identification number 88317675703-01 in the EU Transparency Register.

In its introductory words, the Minister of State, Mrs Hildegard Naughton, recognised that 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.”*

Whilst broadly agreeing with the Minister about the key role and place of road haulage for the Irish economy and supply chains, in its submission to this consultation EUROTRAN would like to emphasise the **need to place road haulage, and those working in the sector – both companies and drivers -, on top of Government's policy priorities**, whilst at the same time making concrete proposals to ensure that the Irish road haulage industry will continue to serve efficiently Irish citizens and customers in a safe, sustainable, resilient and efficient way, and at the same time to improve its image and attractiveness for a younger and more diverse workforce.

Together with the IRHA, EUROTRAN also considers this consultation of utmost importance for the road haulage sector in Ireland. It represents a genuine opportunity for the road haulage sector, its partners and the Department of Transport, to jointly develop, during the second phase of this consultation and under Department's leadership, a **commonly agreed vision, strategy and action plan** with concrete short-, medium- and long-term measures for the development of the entire road haulage sector in Ireland in the coming 10-15 years. For this to happen, due attention should be paid to both the policy priorities at EU level and, importantly, the specific situation of Ireland as an island and a peripheral EU Member State, with a key role of road haulage for the Irish supply chains, economy and society.

Bearing in mind the unique importance of the current exercise, together with the IRHA, EUROTRAN believes that the Department of Transport will be well advised to create a dedicated independent **national public-private Task Force**, composed of all relevant stakeholders, including industry and the research community, to jointly analyse the contributions of the first consultation stage and put together **commonly agreed proposals for a national vision and strategy**, to be adopted by the Government.

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COVID-19 AND BREXIT

1. Introduction

In the 10-year Transport Strategy Document, the following is stated: "*Both COVID-19 and the UK's departure from the EU have presented significant challenges to the road haulage industry.*"

Whilst acknowledging that these two events have had a **profound negative impact** on Irish supply chains and road haulage, it is worth mentioning that the impact of Brexit on the functioning of Irish economy and supply chains has been huge, in particular in comparison to any other EU Member state. This is due to the specific historic, geographical, societal, economic and trade patterns typical for the Irish economy and supply chains.

In addition, the Covid-19 pandemic itself had a devastating effect on society and industry, both nationally and internationally. Transport has been one of the sectors hit hardest by the COVID-19 pandemic, and many businesses in the sector are still facing immense operational and financial difficulties, with a number of them brought to the very brink of bankruptcy¹.

2. EUROTRAN general suggestions

Next to IRHA's own input and proposals, which EUROTRAN fully supports and endorses, we would like to draw the Department's attention to the following specific issues:

- Regarding Covid-19, we believe that widely adopting the EU **Green Lanes'** principles and provisions at Irish, but also at EU and indeed UK levels, would alleviate future problems of the kind operators and drivers were facing during the current pandemic. One must also bear in mind that HGV drivers, unlike private motorists, have to abide by a strict set of rules, including on driving and working hours, and cannot afford to be caught for hours in roadside checks.
- Giving priority to consultations with and input from the organised Irish businesses, in particular the IRHA, over consultants' input, will surely improve Department's capacity to foresee, plan and react to situation of the kind of Brexit or Covid that might happen in the future. This could be done within the framework of a dedicated permanent public-private **Task Force**, established and led by the Department of Transport.

3. Specific EU and international aspects related to Covid-19

Many professional drivers were often unnecessarily caught up in long queues at roadside test centres, putting them at a much higher risk of contracting Covid-19 than in their protected working environment in their vehicle.

Unacceptably long waiting times at borders and ports often lead to unnecessary detours sometimes exceeding 300 kilometres, as commercial vehicle drivers try to find less crowded border crossing points.

The Green Lanes introduced at EU level, the flexibilities for driving and rest time rules, as well as the recognition of the validity of certificates and documents, albeit late and sometimes non-harmonised

¹ See [IRU Report](#) of June 2020, showing a 17% decline in Europe.

or not implemented by some EU Member States, provided some relief for companies and drivers operating internationally.

The lack of preparedness at all levels – company, regional, state, EU, internationally - to address a crisis situation of such magnitude was probably the main lesson to learn and address in the post-Covid period, together with the assistance to be provided to companies from Irish and EU sources, to recover and resume operations in efficient, healthy and sustainable way.

4. Medium- to long-term suggestions regarding future pandemics

Bearing in mind the specific situation of Ireland and the over-proportional impact of crisis situations of of Brexit and Covid, it is proposed that the Irish Government takes a leadership role at EU level in working out, at both [EU](#) and national levels, **emergency and contingency freight transport plans** to ensure the resilience of EU and Irish supply chains. In such plans, apart from Green Lanes, infrastructure, ports etc. facilitation measures, ready-made and standardized measures regarding essential legislation have to be foreseen, which would automatically be triggered in case of emergency, such as on the prolongation of individual and control documents validity, as well as driving and rest time (flexibilities under Article 14 of [Regulation 561](#)) and cabotage rules. Based on this plan, it is also recommended that the Irish Government advocates at EU level to **negotiate with the UK a common approach in case of emergency situations**.

Similarly, revising the [Driver Training Directive](#), as amended by [Directive 2018/645](#) to widen possibilities for on-line training, including a full on-line training and exams during long-term emergency situations, could also become a priority in the future Government strategy for the sector.

5. Brexit-specific suggestions

Considering the importance for Ireland of the UK from a trade, supply chain and road transport perspective, EUROTRAN also believes that a **permanent public-private body** should be created, to monitor the situation, send early-warning signals and make recommendations to both the Irish Government and the Specialised Committee on Road Transport created under the TCA Agreement with the UK. The IRHA and key hauliers could become members of such a body.

In addition, we believe that it is of strategic importance that **Ireland is represented permanently into the TCA Specialised Committee on Road Transport**. To increase efficiency of Irish input, **the IRHA could also be granted an observer status** in the TCA Specialised Committee on Road Transport.

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MAKING ROAD FREIGHT TRANSPORT CLEANER

1. EU level considerations and low hanging fruits

At the end of 2020, the European Commission published its Smart Sustainable Mobility Strategy, with the following ambitious objectives for road haulage:

- By 2030, there will be at least 30 million zero-emission cars and 80 000 zero-emission lorries in operation.
- By 2050, nearly all vans and new heavy-duty vehicles will be zero-emission.
- The 'polluter pays' and 'user pays' principles are to be implemented without delay in all transport modes.

To reach the above goals, the European Commission will propose a revision of the CO₂ standards for cars and vans, and will also review the CO₂ standards for heavy-duty vehicles by 2022. In addition, there will be a proposal for more stringent air pollutant emissions standards for combustion engine vehicles (Euro VII) to ensure that only future-proof, low-emission vehicles enter the market.

Measures such as carbon-pricing (in the form of a possible inclusion in the EU Emission Trading System), taxation, road charging and the revision of rules on the weights and dimensions of heavy-duty vehicles, are being considered to increase demand for low- and zero-emission vehicles.

For alternative fuels, the Strategy calls for a large-scale deployment of renewable and low-carbon fuels without delay. The EU Commission also plans to adjust the roadworthiness legislative framework to ensure the lifetime compliance of vehicles with emission and safety standards.

In its response, the representative organisation of road haulage sector in Europe, the IRU, drew the attention to **two fundamental problems with this EC approach**, which have to be taken into consideration also from an Irish perspective:

- **A wrong focus on the tailpipe approach for measuring CO₂ emissions:** The entire EU Strategy sets out decarbonisation ambitions based exclusively on the measurement of the CO₂ emissions of the vehicle ("tailpipe"). This ignores the source of energy and just shifts the CO₂ issues from the vehicle to the source. For EUROTRAN, only a strategy based on a "well-to-wheel" approach, which takes into account CO₂ emissions starting from the source, has the potential to achieve decarbonisation.
- **No consideration for transitory measures towards the final decarbonisation and greening objective:** The EU Strategy does not foresee a transition for commercial road transport, especially, its heavy-duty segment, and disincentives the option for low carbon fuels. This approach taken in the Strategy ignores the reality that alternative solutions to combustion engines for heavy duty vehicles are only in the infancy of their development. A wide range of options will have to remain available, such as bio-methane, hydrogen or synthetic fuels. The uptake of vehicles based on low carbon fuels should be supported and incentivised and this should happen in a fiscally neutral way, which does not increase the tax burden on road transport operators.

EUROTRAN, together with the IRHA, supports these IRU comments, which are all the more valid in the specific situation of Ireland. We are fully aware of the need for change and the commitment by Ireland, as a member of the EU, to such change. In this regard, the policy makers have targeted 2030, 2035, 2040 and 2050 as their objectives. The luxury of such visionary pursuits is not available to most

of Ireland transport operators and this submission is not only based on Irish commercial realities, but also on what is available today to Irish hauliers, to contribute to these long-term goals. For EUROTRAN, the main objective in the short-term should be the pursuit of the "Low Hanging Fruit" options, proposed by the IRHA's in its submission (17 May 2021) to the Climate Bill 2021 consultation, and the accelerated upgrading of the national fleet to Euro VI.

Summary of IRHA's proposals supported by EUROTRAN

In its Climate Bill submission (17 May 2021), the IRHA placed the focus on what can be done in the short- to medium-term, by proposing 12 concrete measures, to be implemented in Ireland. These are:

1. Incentives to the purchase and running of Euro VI (and in the future Euro VII) HGVs
2. The need to enhance the CVRT test on Adblue System
3. The need to support the use of HVO (Hydrotreated vegetable Oil) to reduce fossil fuel use in existing rolling stock
4. The usefulness to support for night-time deliveries with Dublin container terminal to operate for longer hours
5. The importance of introducing express HGV lanes at tolls, as currently only 10 out of the 11 road toll stations have no HGV express lanes wasting up to 6 million litres of fuel per annum i.e. emissions
6. The need to reinstate 40 to 42 tonnes on 5 axles (6 Million additional Km's alone are now required to collect the farm milk being produced due to this weight reduction)
7. The importance of traffic light sequencing in Irish towns/cities to expedite traffic flow and reduce stops
8. Introducing rebates for professional fuel
9. Reference to be made to the emission class of vehicle's documents
10. Strong reservations to a forced modal shift to railways, mainly due to Irelands specific geography and short distances
11. The need to increase vehicle dimensions and weights and the need to support the introduction of eco-trucks, through specific incentives
12. Systematic introduction of eco-driving in driver's training

2. EUROTRAN longer-term considerations

In a longer-term, in line with the proposals of the global industry body, the IRU, the following could be considered:

- The right mix of incentives by the Government coupled with investment by transport operators will accelerate the market uptake of low and eventually net zero carbon alternatives. But CO₂ must be accounted for correctly. Measuring emissions at the tailpipe only (tank-to-wheel) will distort policy action to reduce CO₂ in commercial road transport. **The more comprehensive well-to-wheel approach must be used to evaluate the real CO₂ impact of fuels.**

- Taxes targeting CO2 emissions that are more favourable for low carbon fuels need to be introduced in order to **make fuels sourced from renewable energy more economically viable**.
- The most appropriate low carbon fuel and technology has to be decided in **an Irish context**, taking into account Irish specificities, such as the composition of the Irish fleet, but also the access to green energy and operators' needs regarding distances travelled or specific transport use cases (for example : Hydrotreated vegetable Oil).

In addition, improving vehicle energy efficiency through the uptake and **further development of new technologies**, including low-rolling resistance tires, aerodynamics, waste-heat recovery or light weighting materials pursued also at EU level, will make a significant contribution to decarbonising road transport with a CO2 emission reduction potential of at least 10%. One way to accelerate this is to increase fleet renewal rates to ensure that available new emission-reducing technologies are deployed as quickly as possible. Transport operators need to be incentivised to invest in and use these technologies by renewing their fleets more frequently. The current fleet age in Ireland is 10 years, hampering emission reduction potential.

- To achieve this, the Government should support and expedite the penetration of the latest technologies through a **dedicated fleet renewal incentive scheme** to be created in Ireland. It is expected that it will be compliant with the [proposed Climate, Energy and Environmental State aid Guidelines](#).

Meanwhile, EUROTRAN, together with the IRHA and IRU, urges policymakers to use the well-to-wheel standard to evaluate and plan for decarbonisation investments and incentives instead of the tank-to-wheel as it is more comprehensive and precise in measuring emissions.

3. Considerations regarding Light Commercial Vehicles (LCVs)

The above remarks for HGVs, including in terms of Government incentive schemes, are also applicable to LCVs, for which less polluting propulsion systems may become available earlier than for HGVs.

LCVs are mostly used in short distance and urban delivery traffic. Therefore, **incentives** have to be introduced also in cities' sustainable urban mobility plans to expedite the uptake of alternative fuel LCVs, coupled with IRHA's (and IRU's) proposals to adapt driving licence categories A and AM to include small electric delivery vans.

It is also proposed that cities in Ireland enter into a long-term partnership with the organised road haulage industry (IRHA), with the objective to negotiate **entry schemes for commercial vehicles** to cities that are adapted to the industry.

4. Considerations regarding eco-driving and Driver CPC training

By training drivers to change their behaviour, CO2 emission reductions of up to 10% are possible. It is estimated that less than half of all EU Member States provide mandatory regular training schemes to stay ahead of regulatory and technological developments².

It is therefore recommended that eco-driver training and related skills monitoring should be incentivised and made a legal requirement.

² In its training programmes, the IRHA and a number of its members have achieved substantial results, i.e. up to 20% improvement, in particular with underperforming drivers, who are otherwise good drivers, but do not understand and work efficiently with modern technology.

5. Good practices

The overall strategy proposed by the IRU to achieve carbon neutrality by 2050, the so-called [Green Compact](#), can help, i.e. as a blueprint, to achieve carbon neutrality in Ireland as well.

The successful implementation of the Green Compact is dependent on government support and incentives in order for road transport operators and all related industries to reach the full their decarbonisation potential.

The five decarbonisation pillars of this strategy are:

1. Broad implementation of low and zero carbon fuels
2. More efficient logistics with Eco-trucks
3. Increased use of collective passenger transport with buses and coaches
4. More efficient and latest vehicle technologies
5. Improved driving behaviour through training and education

IRU's Green Compact proposes concrete actions on how to achieve quantifiable targets in an organised and collaborative approach and, as such, can be *recommended to the Irish Government as a blueprint for a policy approach at national level*, including for fleet renewal in Ireland, to be worked out in partnership with IRHA.

6. EUROTRAN's conclusions and recommendations on decarbonisation

In essence, EUROTRAN supports IRHA's proposal to work out a national strategy and action plan in two steps:

- Phase 1 – upgrade the existing fleets and implement the 12 measures (the “low hanging fruit” approach proposed by the IRHA). These tend to converge with [Prof. Alan Mc Kinnon's intervention during the Hearing on the 10-year road haulage Strategy](#).
- Phase 2 – a dedicated strategy and action plan towards a longer-term transition to alternative propulsions and vehicles.

In addition, the following should be considered:

- A serious reflection on the likely impact of **introducing ETS in road transport** needs to be carried out, possibly also at European level, with the closest possible involvement of the industry, so that authorities and industry could anticipate and come up with joint realistic approaches/proposals.
- The creation of an **industry green label** for member operators, using the experience of other sister trade associations across the EU.
- A dedicated reflection on LCVs, since their number is roughly 10 times higher than HGVs (in Ireland, but also in other countries). Potentially, it might be exactly this segment that needs to be tackled first in terms of greening and decarbonising, also because the technology and alternative propulsions will be available sooner. The issue of refuelling infrastructure has to be addressed as a second pillar, to ensure success.

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MAKING ROAD FREIGHT TRANSPORT SAFER

1. General considerations

When it comes to improving road safety, there are a number of challenges that must be tackled. But there are also many opportunities arising from the continuous advancements in technology³ and in human behaviour. According to [IRU's latest data](#), less than 3% of road accidents involve commercial vehicles. Of these, 85% are caused by human error, with 25% due to the professional driver and 75% due to the other road user.

These results were corroborated by the joint IRU-EC truck [accident causation study](#), which confirmed that human error is the main cause of accidents. In-depth analysis shows that human behaviour, such as non-adapted speed, failure to observe intersection rules and improper manoeuvring when changing lanes, were the main causes of accidents. Truckload and fatigue play only a minor role. One of the concluding recommendations was that improving driver training, both initial and periodic, and upgrade driving school programs adapted to the specific needs of drivers are key to improve road safety.

Road safety is a priority for road transport operators and IRU's 2020 international survey reveals that 85% of them have already invested in acquiring state of the art rolling stock⁴ and improving safety. In general, companies see safety as key to creating sustainable and profitable operations and by the same token, boosting business performance in a tangible way. Safety upgrades in vehicle technology and investment are seen as boosting productivity and operational efficiency and helping to cut costs and stay ahead of the competition.

Currently, a majority of operators systematically analyse their safety-related data, but almost two in five gather only some data and fail to obtain the complete picture. A lack of both financial and human resources⁵ are cited as the main barriers preventing better data collection.

In addition, IRU's survey reveals that there is a clear demand from operators for standards on road safety, in particular, relating to vehicle safety and human elements such as driver training and certification.



Source: IRU's road safety report, 2020

³ As proven, for instance, by the effectiveness of AEBS, to avoid rear collisions.

⁴ Which seems not to mirror Ireland's fleet composition.

⁵ In a sector dominated by small- and medium-sized operators (SMEs).

2. EUROTRAN suggestions

Next to IRHA's concrete proposals focusing on people, vehicles, infrastructure and the regulations applicable to them, EUROTRAN further suggests to the Department of Transport to develop, in partnership with the Irish road haulage industry, a **national strategy and a multi-annual action plan**, to further enhance and improve road safety in the road haulage sector in Ireland, based on the following **main pillars**:

- **Investment:** Develop a set of targeted Government incentives, for example adjusting taxes, tolls, permits and subsidies, to allow road haulage operators to make investment in greener and safer vehicles more viable for them.
- **Training:** Advocate at EU level and invest at national level, in partnership with the Irish road haulage industry, into developing a dedicated state of the art safety modules for initial and periodic training of drivers, as well as to renew vehicles used for training purposes. At the same time, develop a national awareness programme for all private car users, to raise their awareness upon and learn how to behave on public road (i.e. as part of their driving lessons curriculum and exam), together with large commercial vehicles.
 - **As a matter of short-term priority, officially acknowledge the IRHA-initiated Certificate in Digital Assisted Eco-Driving (HGV) Level 5, Special Purpose Award**, as being the equivalent of two CPC modules to promote its roll out and delivery, with the objective to strengthen industry's own commitment and involvement into training and the link between training and practice.
 - In addition, a joint public-private reflection should also be launched sooner rather than later with the objective to address training issues related to **LCVs' drivers** of vehicles between 2.5-3.5 tonnes, which will soon become subject to CPC requirements, as a result of the entry into force of Mobility Package 1 provisions.
- **Enforcement:** Advocate at EU level and develop a national programme to **digitalise** enforcement and control documents, with the objective to :
 - remove paper documents from roadside controls by 2025,
 - develop a system allowing part of the checks at premises to be carried out from a distance.
- **Enforcement and cooperation:** Incentivise the Road Safety Authority in Ireland to develop, in partnership with the IRHA, a joint code of practice on enforcement in the digital age, and a dedicated Service Level Agreement, to establish standards for drivers and enforcers on roadside checks.
 - As a matter of short-term priority, **revise the Irish risk rating system**, to guarantee access to information, transparency, and fair appeal procedures, whilst transforming the system into one based on merits and incentives, allowing all hauliers to achieve green status; in parallel, adjust the imposition of infringements to reflect fleet size and realign the weight of infringements.
- **Facilitation:** Accede to the protocol on the e-CMR.

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EU ROAD TRANSPORT POLICY (MOBILITY PACKAGE 1)

1. Introduction

The recently adopted and published (July 2020) core legal acts of the EU Mobility Package 1 (MP1) represent a major adaptation of the rules and their enforcement. As such, both authorities and the road haulage industry in Ireland, but also in the rest of the EU Member States are impacted. The same is true for the UK-related commercial traffic, since a number of the MP1 rules apply in one form or the other within the EU-UK TCA Agreement.

More than a dozen of implementing and delegated acts need also to be worked out and adopted, to operationalize various aspects of Mobility Package 1, but also the [e-FTI Regulation](#), to create a solid legal basis for future digitalisation of documents and procedures.

The main overall challenges, as seen by the industry, are twofold:

- a) the readiness of Ireland and other EU Member States, to **implement those rules** into national legislation and provide the relevant information to companies and drivers in a standardised, template-based form, at least in the English language, such as the rules on posting, and
- b) a common understanding, interpretation and **business-friendly enforcement** of these new rules across the EU, including in Ireland by the RSA.

2. EUROTRAN suggestions

To better prepare, implement and accompany the transition process, EUROTRAN suggests to the Department of Transport to:

- Create an ad-hoc public-private task force, with the participation of the IRHA, to advise upon and monitor the work on the MP1 and e-FTI implementing and delegated acts, and the practical implementation and enforcement of these new MP1 rules in Ireland and across the EU.
 - Work out, as a matter of priority within this task force, a national position on the **return of the truck**, preceded by a scientific evaluation of its impact on the Irish road haulage business, economy, supply chains and consumers, and advocate this position at EU level, in collaboration with like-minded EU Member States. See more details below.
 - Work out, within this task force, a national system of MP1-related co-responsibility of consignors.
- Engage pro-actively in the on-going process of clarification of the new MP1 rules, raise the relevant questions with the EC services and promote an EC funding for a future **TRACE 2** project, to clarify and provide examples on the enforcement of the new driving and rest time and posting rules.
- Proceed to a radical reform of the Irish risk rating system, to ensure fair treatment of all operators, as well as operators' access to their **risk rating records** and right to appeal.
- Support, including financially, the road haulage **vocational training centres**, to prepare and handle the training of drivers of 2.5-3.5 tonnes vehicles, before and after the deadline (21 May 2022).

3. Return of the truck

Regarding the **return of the truck**, unfortunately the EC impact assessment study (Ricardo, February 2021) did not provide sufficient evidence to evaluate the impact of the return of the truck on the Irish road transport business, supply chains and environment⁶.

However, the general study conclusions covering the EU level already indicate that:

- Up to 1.9 million new journeys could arise in 2023 compared to the baseline (business-as-usual case) scenario, representing an increase of 2% in international road goods transport journeys in 2023.
- In terms of vehicle-kilometres which reflect the additional distance travelled during those new journeys, an increase of up to 2.5 billion vehicle kilometres could be observed in 2023 due to the adoption of the vehicle return measure. This represents an increase of 4.8% in international road goods vehicle kilometres in 2023.
- The **environmental impacts** from the return home provision are directly linked to the potential increase in vehicle-kilometres. Overall, the new provision could result in up to 2.9 million tonnes of additional CO2 emissions in 2023, representing an increase of 4.6% on the international road freight emissions in 2023 compared to the baseline.
- It is also expected that operators will need to cope with additional costs to comply with such a rule, and as a result freight rates would increase as well as competition – the latter to the **detriment of SMEs**, which represent the bulk of the Irish road transport business.

Bearing in mind the specific geographical location of Ireland as both a peripheral and island country, it can be reasonably expected that the impact on the Irish international road haulage business and supply chains will be over-proportional, as a result of the double periphery/island penalisation.

Hence, the above request to proceed urgently with a scientific evaluation of the impact of this measure on the Irish road haulage business, economy, supply chains and consumers and, as a second step, to work out a dedicated national position on this issue, to be advocated at EU level.

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⁶ This also highlights the lack of appropriate dialogue between government and industry on what is the best position and outcome for Ireland.

ROAD INFRASTRUCTURE AND USER CHARGING

EUROTRAN general suggestions

EUROTRAN supports the IRHA's proposals on infrastructure and would like to emphasise the following elements for the upcoming review of the National Development Plan (NDP) and the subsequent elaboration of a sectoral strategy for land transport and the National Investment Framework for Transport in Ireland:

- Integrate IRHA proposals aiming at greening road transport services and operations, as follows :
 - Introduce Express HGV lanes at tolls, bearing in mind that 10 out of the 11 road toll stations have no HGV Express Lanes wasting up to 6 million litres of fuel per annum i.e. emissions.
 - Reinstate 40 to 42 tonnes on 5 axles (6 Million additional Km's alone, now required to collect the farm milk being produced due to this weight reduction): This could be reinstated for low emission vehicles only, including Euro VI diesel vehicles, giving an operational advantage to the modern vehicle, whilst accelerating the transition to lower emissions vehicles.
 - Introduce traffic light sequencing in Irish towns/cities to expedite traffic flow and reduce stops.
 - Paperwork: Introduce a mandatory registration of the emission class of the vehicles in the vehicle registration documents.
 - Safe and secure truck parking areas: Develop a national plan and support instruments, including from EU sources, for investment into safe and secure truck parking areas in Ireland.
- Develop a longer-term strategy (10 years and beyond), with allocated funds, for the deployment of alternative fuel's infrastructure in Ireland⁷.
- Advocate with cities, willing to introduce sustainable urban mobility plans (SUMP), to cooperate with the industry in developing dedicated urban delivery sections into these plans, which would fit industry's specificity and requirements, to ensure smooth and increasingly greener urban delivery.
- In such SUMP, exempt commercial vehicles from urban access vehicle restrictions due to the high costs and negligible benefits of restricting their access. Any regulatory changes that may impact commercial vehicle access must be discussed with mobility and logistics operators several years before implementation, to account for current fleet renewal rates and technology investments. Schemes should be technology neutral, targeting specific outcomes rather than the technology used itself.

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⁷ The main remaining challenge is the lacking development of charging infrastructure and the speed of charging. In March 2021, the European Commission [report](#) on the implementation of the Alternative Fuel Infrastructure Directive (AFID) stated that the growth of alternative fuel vehicles is not matching infrastructure deployment in Ireland.

LABOUR MARKET AND SKILLS

1. General considerations

According to IRU's latest survey (2020-2021), and despite drastically reduced demand during the COVID-19 pandemic, there was still an alarming shortage of drivers. Surveying 800 road transport companies from over 20 countries, IRU found that unfilled driver positions in Europe were still at the level of 7% for truck drivers even during pandemic.

Challenging working conditions, further exacerbated by the pandemic, and difficulties attracting women and in particular young people to the profession, at the background of a persisting and even raising unemployment rates among young people, are the main reasons for these labour shortages.



Source: IRU, 2021

The situation is expected to further worsen with the post-Covid recovery, reaching quickly the pre-Covid rates of +20% unfilled positions in road haulage, coupled with a constantly increasing average age of those occupied in road haulage. In some EU Member States the average age is already reaching 50 years! New reports from Irish operators confirm already this alarming trend.

The industry, at global level, has taken initiatives at global and Irish level, by adopting (2019) a dedicated multi-year [programme](#) to address driver shortage, with short-, medium-, and long-term measures.

Amongst the most salient results so far are:

- the [Driver Charter](#), agreed upon between the industry and the representative organisations of shippers and trade unions, open for signature by any interested stakeholder;
- the concrete proposals to bridge the gap between school and wheel, including [proposals](#) to address the minimum age of professional drivers within the expected revision of the EU Driving Licence Directive, such as the possibility to start truck drivers vocational training before the age of 18, as well as to adapt the driving licences A and AM, to allow young people of 16 years, to be able to drive small electric delivery vans in city delivery;

- a planned (2021) negotiation with the organisations representing the enforcement authorities at EU level, to establish a Service Level Agreement (SLA), to improve, harmonise and facilitate roadside checks in an industry-friendly way.

This critical situation, with an alarming and constantly increase shortage of drivers, coupled with the challenges posed by rapidly increasing automation, will require further joint efforts by industry and the Government, to better understand, accompany and manage the process in the coming 10-15 years, up to 2035, when automation is expected to become massive.

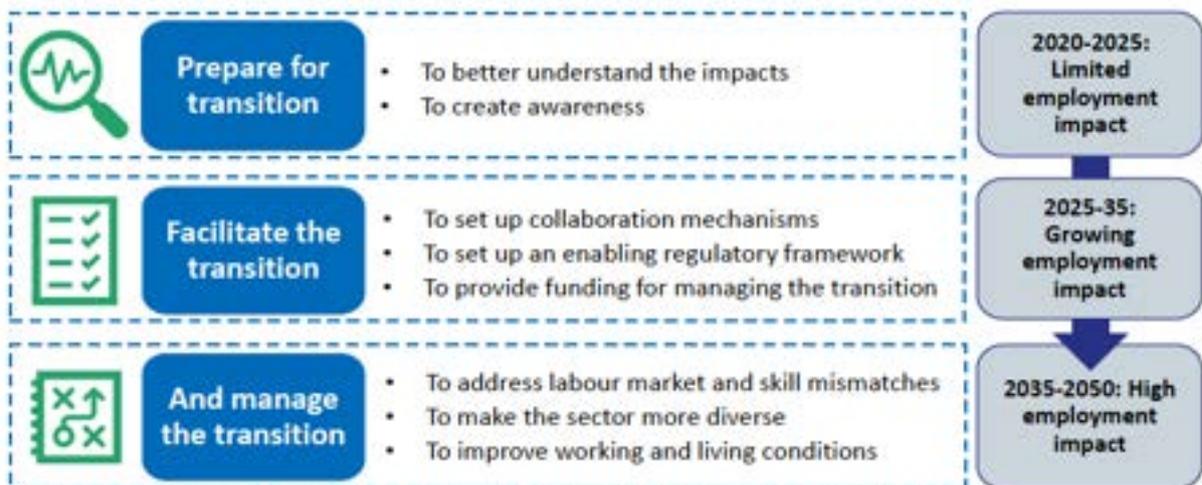
Freight transport services labour market transformation-3

- Fleets almost completely automated (level 4 and 5) in scenarios 1 and 2
- Automated freight transport services not nearly as employment-intensive, resulting in job losses
- Only partial compensation of job losses by automated freight transport



30-year forecast

Preparing, facilitating, and managing the transition ...



Source: EU road transport sectoral social dialogue meeting, 28 April 2021

2. EUROTRAN suggestions

Bearing in mind the size of the driver/skill shortages and the threat it represents not just for the road transport industry, but also for the Irish supply chains and economy as a whole, EUROTRAN supports the IRHA's proposal, to launch an ad-hoc public-private reflection group, with the objective to work out a national strategy and action plan (with short-, medium-, and long-term measures) to address

the issue of labour and skills shortages, current and upcoming, covering at least the following main areas:

- **Facilitating access to the driver's profession and training**, including **funding of training**, and improving existing and acquiring new skills;
- **Attracting divergent work force** in the sector, including young people, women and migrants, and recruitment and retention of talents;
- **Improving the image and perception of the industry**, including among young people and in schools, including also early school-leavers, who should be able to engage in a path of change to obtain appropriate driving licences;
- **Identifying potential good practices** in Ireland, such as IRHA's own work on training, as well as from other countries, including on how to fund training, that might be relevant in the Irish context;
- **Adaptation to future technological and society challenges**, including digitalisation and automation.

Next to these strategic issues, such a group could also address and come up with proposals on the following issues:

- the professionalisation of **LCV drivers**, in particular those driving 2.5- 3.5 tonnes;
- **professional drivers' minimum age**;
- the **IRU's Driver's Charter**, which needs to be massively supported and signed by operators and shippers in Ireland.
- Creating jointly (RSA and IRHA) a **Service Level Agreement** to ensure fair treatment of drivers during roadside checks.

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INTEGRATED TRANSPORT PLANNING AND INTERMODAL TRANSPORT

EUROTRAN suggestions

Cities and ports are key elements of Ireland's infrastructure system. EUROTRAN therefore supports IRHA's approach to address a selection of key issues, such as:

- Negotiate (IRHA and Irish cities) an agreement (or a good practice charter) on **urban deliveries and urban access restrictions**, based on the principles of technological neutrality and targeting specific outcomes, rather than technology itself, and bearing also in mind that diesel will remain the only available alternative for road haulage in the foreseeable 10 years.
- Start by proposing to Dublin City Authority to review the Dublin City HGV Management Strategy, with the objective to provide incentives for greener commercial vehicles, in line with the IRHA Climate Bill submission.
- Regarding the intermodal strategy, address (as a Government priority) also the issue of EU mainland ports used by Irish hauliers and the need for facilitation measures, such as the review of weekend traffic bans in France on key corridors for Irish import/export.

EUROTRAN would also like to re-emphasise the IRHA's position taken in its **Climate Bill 2021** submission about the lack of economic rationale for an efficient use of combined rail-road transport services in Ireland, due to short distances.

As far as Brexit is concerned, EUROTRAN also suggests, to establish a public-private body to monitor Brexit procedures, make proposals and send early warning signals to Irish authorities and/or the TCA Specialised Committee on Road Transport.

Dear Minister

Thank you for the opportunity to make a submission regarding Road Transport Strategy .

Our company, Exceptional Load Services Ltd, as our name would suggest operates in the Heavy Haulage Sector, specialising in Wind farms and Power Generation but covering all areas from site cabins right up to 400 tonne turbines.

The sector has been very much neglected over the years and largely goes unnoticed as the bulk of the visible road movements are carried out at night but in fairness on a tonnage or mass basis is a very big part of the haulage sector.

Our areas of concern are Permits, Routes, Pilot/Escorts and Garda escorts and I will deal with each under its own heading.

Permits:

There are two permit systems in Ireland - Road Traffic (Special Permits for Particular Vehicles) Regulations, 2007 (S.I. No.283 of 2007) and ROAD TRAFFIC (SPECIALISED VEHICLE PERMITS) REGULATIONS

2009 (S.I. No. 147 of 2009)

S.I. 283 of 2007 replaced 2003 legislation but to date nearly 50% of Local Authorities have not adopted the 2007 legislation and as such are issuing invalid permits as the 2003 legislation was revoked.

There are currently 31 Local Authorities who issue permits and each have their own application process, regulations and charges. The application periods range from 4 to 30 days and many have no dedicated department looking after the applications or even a dedicated email address. This leads to a high rate of non-compliance because permits are too hard to get and it is estimated that up to 50% of all oversize loads travel without a permit.

A system that is fit for purpose and workable is urgently needed. Both permits systems need to be revamped.

S.I. 147 of 2009 has not had an update of designated routes since 2010 (S.I 461 of 2010) and there are now some 30 new sections of road like motorways and town bypasses that need to be added to this legislation.

As we have accounted for around 35% of all permits issued by Local Authorities over the past 7-8 years, we have first-hand knowledge of the difficulties and additional costs to the sector because of these shortfalls. It is fair to say that neither piece of legislation is currently fit for purpose, if it has ever been.

These permits are required by companies involved in National Development programmes, development of green energy projects, maintenance of the National Grid, and for very important FDI projects. Their current permit system seriously impacts on this type of work

Routes:

While the new motorway network has been very welcome there is a very major problem with routes out of our main ports like Dublin and Ringaskiddy where junctions are being tightened down to accommodate pedestrians and other road users, no thought is given to Heavy Haulage along those same routes. This results in footpaths, Traffic lights, road signs and roundabouts constantly being uprooted for the passage of maybe just one load. Added to this the blatant disregard for TII road

sign/ traffic calming design criteria means many new signs are being set in concrete instead of to the requirement of being in sockets. None of our cities with ports have an official designated oversize load route.

Pilots/Escorts:

Load Pilots and their vehicles are completely unregulated in Ireland whereby a 17-year-old person with no experience can actually legally escort a load 6 time larger than a normal truck without any experience. This needs to be regulated as there are very well-founded concerns regarding road safety in this regard.

There are no training or qualification programmes in Ireland but our company has sent all our drivers abroad for their qualifications and have completed advanced driver courses here. Other EU countries have well advanced systems where Pilots have the qualification of Traffic Director which allows them to manage traffic situations while in the control of an oversize load.

Escort vehicles are specified by Local Authorities and in fact they have no legal standing whatsoever. There is a question as to whether the amber beacons they specify are legal as this appears to be confined to works and utility vehicles. This legislation needs to be updated. We currently use an amber /white combination which clearly makes our vehicles stand out as escort vehicles and has been a major factor in our very satisfactory safety record over the past 20 years. This works well in some other countries and needs to be legislated for here. The lights could be licenced in some similar fashion as blue lights to avoid overuse and preserve their integrity. This would be a major step forward for safety. Also, the accepted practice is that escort vehicles should carry relevant safety/emergency equipment like fire extinguishers, road flares, cones etc. We have no such regulation here.

Garda Escorts.

Again, there is no legislation or legal requirement for Garda escorts and in the absence of such it has become a very controversial and expensive practice. I don't intend to go into detail in this submission but it needs to be regulated in a correct and fair and I must add honest manner. That is not the case at present and is not acceptable and cannot continue. I should also add that the Gardai have no specific training for escorting oversize loads and this is causing serious safety concerns on a daily basis.

In conclusion I would make the point that for the most part the Heavy Haulage sector is run very professionally by dedicated people with very good equipment and it is important to have legislation to make the industry better and safer for the future.

Best regards

Edwin Sunderland
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Ireland's 'heavy team' for permits, pilot cars & surveys.

Road Transport Freight Policy Division,
Department of Transport,
Leeson Lane,
Dublin, D02 TR60

By Email: haulagestrategy@transport.gov.ie

Our ref: 886-AC-01001

Date: 16/7/21

A Chara,

Re: Response to Ten-year Strategy for the Haulage Sector First Consultation

Fingleton White welcomes the opportunity to comment on this public consultation.

Fingleton White provides multidiscipline engineering services for the energy industry throughout Ireland and the UK. It operates across multiple sectors including low carbon transport, gas, bioenergy, hydro, solar, CHP, industrial heat and water.

Consideration to alternatives to road haulage should be the first point in forming this ten-year strategy. Two obvious alternatives are rail and pipelines. Pipelines are used throughout the world for the transport of gaseous, liquid and slurry products. Pipelines are proven to be 100 times safer than road transport and are powered in almost all cases by electric driven pumps and therefore have zero local emissions and when powered by renewable electricity have zero carbon emissions. They also have the ability in many instances to power up and down in a controlled way, which is of significant benefit to an electricity network dependent on a variable electricity supply from wind and solar power.

There are two planned pipeline projects that we are aware of:

- 1 million tonne/annum pipeline from Dublin Port to Dublin Airport
- 4 million tonne/annum pipeline from Dublin Port to Baldonnel Distribution Park

In addition to these there is scope for the collection of slurries from farms via pipeline to produce Biogas.

Pipelines have the potential to contribute significantly to the transport of goods and should not be ignored in any strategy to reduce or decarbonise haulage via roads and HGVs.

In response to the specific questions asked in the consultation document

What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

Fingleton White welcomes the commitment to maintaining a low excise rate for natural gas and biogas for a period of eight years and wish to confirm that this is up to and including

2029. We believe this period is the minimum required to encourage the investment decision and will encourage a shift to lower carbon natural gas driven vehicles.

The use of natural gas as a transport fuel brings reductions in carbon emissions and also provides an opportunity to further reduce emissions through use of Biomethane. Biomethane production in Ireland at present is at a relatively small scale and support is required to realise the full potential of the emissions reductions possibly through the use of Biomethane. Biomethane production takes waste streams, typically from agriculture and food processing activities and other feedstocks through a process known as Anaerobic Digestion which produces Biogas. This Biogas is then upgraded to Biomethane which can be injected into the natural gas grid and used as a transport fuel through CNG refuelling stations. A scheme similar to UK's Renewable Transport Fuel Obligation Scheme (RTFO) is required to encourage the uptake of Biomethane as a transport fuel. This would provide a market for Biomethane production facilities leading to increased production of Biomethane and lower emissions associated with road haulage, while at the same time lowering emissions from the difficult areas to decarbonise in the agricultural and food processing industry.

The roll out of CNG refuelling stations is a key step to facilitating the move by HGV owners from diesel to the lower carbon alternative of compressed natural gas. The development of these refuelling stations could be streamlined through planning exemptions for CNG refuelling stations. A wide network of refuelling stations is required to encourage the uptake, these should be distributed on motorways and at other locations off the motorways.

A programme to encourage behavioural change tied in with increasing refuelling infrastructure is crucial. It is important to consider over half (53%) of Ireland's hauliers operating domestically have only one HGV. If the driver is used to filling up in one location and a change in fuel reduces choice, they are less likely to make the change.

We trust that the Department of Transport will take the above into consideration when developing the ten-year strategy for the haulage sector and we welcome any further opportunity to input into the development of this strategy.

Yours faithfully,

A handwritten signature in blue ink, appearing to read "Kevin Fortune".

Kevin Fortune
Fingleton White
kevin.fortune@fingleton.ie

Submission on Ireland's First Ten-Year Strategy for the Haulage Sector by Jarlath Sweeney, Editor Fleet Transport

1. Green Supply Chain: From product manufacturer to customer via haulier – Apart from an Alternative Fuel Strategy – Is there a consideration on longer, heavier trucks/trailer combinations – 25m/60 tonnes as per Scandinavia motorways? Two of these units replace three or more standard artics. Can be used safely on Ireland's motorway network. Axle weight distribution evenly balanced. Successful trials conducted to date.
2. Alternative Fuels: Strategy needs to be more direct and clear; Natural Gas, Electric & Hydrogen (H2) – Need for filling stations/charging points infrastructure nationally. Battery Electric (BEV) – vans, light trucks, distribution vehicles. Natural Gas – CNG; National haulage. LNG; Long distance haulage. H2; Long haul.
3. Driver CPC: Need for evolution; For second phase participants, only a refresher course needed, as per ADR course. Introduce physical Eco-Driving module, on or off site of haulier – only practical way of demonstrating fuel economy driving methods. Reduce the 5 modules to 3 by combining topics.
4. Safer trucks in operation: Consider implementing CLOCS & FORS standards as per London/UK for urban CV drivers in order to protect vulnerable road/street users including scooter users coming soon. Audible warnings and additional visibility provisions must be installed on the trucks.
5. Cleaner trucks to replace older units: Thoughts on introducing a scrappage scheme? Introduce from pre-Euro 5 – from 2009 reg.
6. Truck design: Need for roomier, safer and more comfortable trucks – new cab designs on the way

7. Road Tolls: reduced fees for lower emission vehicles welcome. What about the trucks continuously avoiding the M4 toll and still passing through Kinnegad on the old road? This needs to be stopped.
8. Rail freight: Opening of the Western Rail Corridor vital – West to south (and return) route most viable. Links to Foynes, Cork, Waterford and Rosslare ports are required and necessary for this eco-friendly infrastructure to work.
9. Road network: Limerick to Cork improvements ongoing – Tuam to Colloney, Sligo by motorway via N17 needed. For future primary road developments, ensure that they are dual carriageway for better safety.
10. Light Commercial Vehicle: Future is Electric; Issues on Working Time Directive/Drivers Hours/Speed limiters need to be looked at and new regulations implemented as express deliveries dominate usage. Main parcel express companies hiring sub-contractors, under extreme pressure, repair and maintenance often neglected. For EV vans, the overall GVW needs to be raised to 4.25 tonnes, as per EU, keep within the 3.5 tonne tacho limit but with the 750kg battery weight allowance.
11. The term of the strategy will involve significant investment by transport firms to reduce the impact on our environment, it is a legitimate fear of the transport operators, last mile etc., will be bounced into expensive policy and regulation by those at a different part of the supply chain. Is this something you see a reasonable concern?
12. The last significant review of the road haulage sector took place pre-2000, with the Indecon Report conducted by the IRHA. While it produced a major plan for the future, many operators were concerned that at times some of the stake holders became vested interests and at

times the plan became a “users” charter for agents or customers. Are you conscious of this danger?

13. Brexit is held up as a new situation that the transport industry must adapt to and get on with. The transport industry is by its nature well used to adapting. Brexit is likely to change the way companies do business and will in reality have a bigger effect on the way both economies trade. It could be argued that the effect in the long term on transport operators will be negligible. Does the Government see the loss of overnight trading, delivery systems and the introduction of fiscal and regulatory regulations as an economical problem rather than a transport problem?

14. Will the strategy present a fair representation of own account road transport operators? On this sector, is there a plan to introduce similar road worthiness and compliance/self-declaration legislation, as per hire and reward operated trucks?

15. With digital technology coming even more to the fore within truck operation and transportation in general, the need for fully qualified IT graduates will be needed all the more. Call for the Institute of Technology to create and develop course modules with these elements in mind.

Switch to Zero Mission: Ten-Year Strategy for the Irish Road Transport Sector by Fleet Transport magazine – www.fleet.ie

There seems to be a lack of understanding of the industry and a belief that operators can simply trade in their older trucks for new more environmentally friendly units or better still just get an electric one. The lack of understanding centres around the fact that transport is a business and to survive that business must make money. The investment is currently too great for the vast majority and even if an operator was to invest it in an electric HGV there are no assurances that they will keep the work and that they would not be undercut.

Putting it very simply, if an operator with an EV needs €1,000 to do a round trip Dublin/Cork/Dublin. An operator even with an EEV diesel could do the same trip for €500. If you were the company paying the transport, who would you choose?

There seems to be an underlying intention to impose a framework of 'Road Pricing' and then allow a pro-rata discount or rebate for vehicles depending on emission ratings.

It is noted on page 4 (2nd last para) - "a number of excellent examples of decarbonising are evident across the country." The document goes on to comment strong collaboration on alternative fuels. In fact, this move to alternative fuels has been extremely slow and has been industry lead rather than any Government policy, mainly from the private sector.

The document states that 45% of trucks are 10 years old. It must be understood that the main reason for this is that the margins are so tight. This is something the industry has had to deal with for many decades.

For transporters Brexit is not as such a problem apart from some small delays and inconvenience. It mainly impacted on paperwork and the industry is well used to dealing with similar difficulties on an ongoing basis. This was similar to issues surrounding Covid-19. The pandemic did not as such impact on the industry and once the wheels turned everything went on just fine. Some drivers were delayed slightly however this was viewed by the majority of people as of little importance.

With regard to the driver shortage. This is an 'Industry Problem' and its one for the industry to 'make itself' more attractive to new entrants. The training is available nationwide and is completely free from small van (B Licence) through to Bus/Coach and Artic (D and C+E). Quite simply the rates of pay for what is for the majority of drivers a 12-hour day does not compete with other occupations. In addition, the lack of facilities/parking on the road plus the severe and increasing difficulties drivers encounter trying to access city and urban delivery points, these points plus the general treatment of drivers by all, including many within the industry all lend to make the job unattractive.

Driver training programmes on Eco-Driving do certainly have an impact however they are highly time consuming and therefore expensive to run. In addition, they require further and constant monitoring to ensure that a return is being gained. For any of these schemes to work there must be something in it for the driver by means of recompense for their perceived time and effort. Would the Government support such a measure?

If the Government was serious about decarbonising road transport. There is one simple action that would bring an immediate reduction in vehicle emissions, CO₂, and go some way to alleviating the driver problem. This measure would also deliver efficiencies for all concerned including removing a number of HGVs from the roads and possibly delivering an additional road safety benefit would be the immediate introduction of Eco-Combis (25m/60t). This measure could be put in place tomorrow and 2 Eco-Combis would replace 3 standard artics.

I had another related thought on helping to reduce CO2 in transport.

As ecommerce/internet shopping continues to grow with an increasing number of delivery vans criss-crossing the country calling to offices and homes, there is an opportunity for Irish Rail to provide a distribution service, dropping off the parcels at each railway station for the internet customers to collect there.

Of course to offer a nationwide service, the Western Rail Corridor needs to be re-established to link the West to the Southern regions.

This could have a two fold advantage points; reduced carbon footprints and additional business for Irish Rail!

Many thanks

Jarlath

Submission to Government on Ten-year Strategy for the Haulage Sector

The Forestry Industry Transport Group

Formed in 1999, the FITG is an industry forum with representatives from all major stakeholder groups, including:

- Department of Agriculture, Food and the Marine (DAFM)
- Department of Transport, Tourism and Sport (DTTAS)
- Local Governments
- Forest Industry
- Haulage Sector
- Educational Bodies
- Teagasc

Among the objectives of the FITG is the provision of a forum to discuss issues relating to timber haulage, identify international best practice and encourage innovation in areas concerning timber transport.

Introduction:

The Forest Industry Transport Group welcomes the publication of the Ten-year Strategy for the Haulage Sector First Consultation Document and we welcome the opportunity to submit our views for consideration.

The forestry sector is a significant contributor to the Irish Economy. It is estimated that the Irish forestry and forest products sector contributes €2.2 billion to Ireland's GDP, or 1.3% annually. The sector supports approximately 12,000 jobs directly and indirectly. Following decades of investment into the sector, it is predicted that domestic timber production will double by 2028 with clear opportunities for import substitution, rural economic development, sustainable employment and increased exports

The timber industry is a significant indigenous economic sector with strong potential for growth and primarily rural based job creation. The extent of this potential for growth stems from many decades of investment into the sector resulting in an expanded forest area, an increase of the domestic timber resource together with all resultant economic and environmental benefits.

Round timber transports usually start out on local roads due to the location of much the forest estate. These roads have not benefitted from the same investment that the forestry sector has, with some being weak and unsuitable for the modern demands that rural Ireland's economy places upon them. Timber transport requires the use of heavy goods vehicles while operating within legal load limits and this necessary activity has proven especially challenging in various parts of rural Ireland due to the lack of investment into the rural road network.

The FITG published the Managing Timber Transport – Good Practice Guide in 2014 which provides a partnership approach to minimising the negative effects of timber haulage through improved

planning, communication, and operations management. Shortly afterwards, the FITG worked with central government to promote the introduction of Central Tyre Inflation (“CTI”) technology to Ireland’s timber haulage fleet. CTI is internationally recognised and proven to mitigate against damage to weak road infrastructure that would otherwise be caused by the use of standard heavy goods vehicles.

Forests tend to be located at the end of the road network resulting in over 80% of the private forest estate being accessed by local roads only. This is inevitable due to the type of land which attracts forestry, i.e. unproductive and marginal land such as shallow peat or wet gleys.

The challenge this poses is clear. Significant challenges now present themselves to all stakeholders to transport round timber over the poorest part of the road network.

With Ireland having just below 11% forest cover, and government policy being to expand this to 18% over the coming decades, the current challenges will become worse unless addressed.

A 10-year strategy for the haulage sector is very welcome, and it is important to highlight at this juncture that FITG consider our response to relate to all those that operate fleets of heavy commercial vehicles up to 46 (metric) tonnes gross vehicle weight, including the own account sector as well as those operators that have operator licences.

Our submission will provide detailed answers to the questions posed in relation to the 8 defined sections, COVID-19; Brexit; Environmental/Decarbonisation; Road Safety; Mobility Package; Road Infrastructure; Labour Market / Skills and Intermodal Transport. The submission also outlines a synopsis of other topics/ points that are not directly referenced in the consultation document but which FITG feels are important to consider.

Business cycles are generally understood to play out over a 7- 11-year period, therefore the duration of the proposed strategy, 10 years, will provide the haulage sector with a long-term perspective of how the industry will be shaped by long-term changes. All strategic plans should be living documents, and the pace of change within the freight distribution and logistics sector, Brexit, Covid EU Green Deal, technological advancements require a strategy that is organic and dynamic. FITG makes the following observation: -

We expect the strategy will be published by Government or the Department of Transport. The strategy should clearly set out the key actions underpinning it as well as the Lead Agency / Department, the person with responsibility within that Agency / Department, the target completion date, and any supporting Department / Agency.

The monitoring arrangement must be made clear e.g., in the case of the Road Safety Strategy, the Road Safety Authority (RSA) is responsible for ensuring the Road Safety Strategy is flexible and responds to changing circumstances, as well as reporting progress annually to the Minister for Transport. Who will carry out the corresponding responsibilities in the case of the strategy for the haulage sector?

The Ministerial Committee on Road Safety has also played a critical role in monitoring the progress of the Road Safety Strategy and similarly there is a cabinet sub-committee on insurance reform. Because of the cross departmental functions which impact on the haulage sector FITG believes an appropriate monitoring role involving Government Ministers should form part of the monitoring arrangements and would be hugely instrumental in steering the delivery of the strategy.

As well as an annual progress report, there should be a mid-term evaluation of the strategy to provide an opportunity to assess and recalibrate priorities and targets.

INSURANCE

FITG recognises the steps being taken by Government in relation to insurance reform, however, FITG contends that the Timber Haulage sector requires speedier intervention by Government to ensure that more competitive and realistic insurance premiums are available to fleet operators. The increased cost of insurance is having a serious impact on day-to-day operations with little engagement from the insurance sector in proposing solutions to operators in order to garner more competitive rates. The cabinet committee sub-group on insurance reform, chaired by the Tánaiste and Minister for Enterprise, Trade and Employment, must focus on the commercial motor sector to develop key solutions for this type of insurance. Adoption of risk management practices must be encouraged, recognised and result in substantial premium savings for operators who conduct their business to the highest standards. On the other hand, those operators who have claims and who do not implement such high standards in risk management and rectification practices should expect to see this reflected in their premiums.

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 Irelands supply chains?

The pandemic has highlighted the resilience of the supply chain to ensure essential products such as timber are available to industry. However, the pandemic has highlighted an inequality between how the supply chain industry is perceived versus other essential services and this must be reviewed. It also highlighted the deeply negative impact that a dysfunctional regulatory framework can have on maximising economic activity during a time of crisis. At a time when Ireland needed to be as self-sufficient as it could be, the regulatory crisis in forestry damaged Ireland's capacity to boost essential employment opportunities and improve the self-sufficiency of the economy at a time when international supply lines became strained. Developing a broader understanding of the intricacies and complexities of the supply chain is important in supporting the industry in times of crisis. The bottom line is, if the supply chain is disrupted the State is at risk due to the unavailability of essential items such as food, water, medical supplies, building materials including timber and so on. Developing a strategy that preserves the supply chain at all times is the most important lesson from this most recent crisis.

1. Better communication from agencies with responsibility and links to the supply chain is critical. Industry requires clear guidance and information, and, while appreciating that COVID-19 was something the likes of which we had not experienced before, this was slow to emanate from key stakeholders such as the RSA, HSA, and the Department of Transport. Industry specific guidance is required. In the early stages of the crisis the following issues were common:

- HSA: The Authority did not demonstrate a clear understanding of their role in managing the pandemic particularly in relation to the freight distribution and logistics sector. There was a distinct lack of guidance on basic risk management requirements provided by the Authority.
- RSA: Conscious of how quickly COVID-19 was thrust upon us, nonetheless, changes to inspection regimes, commercial vehicle roadworthiness testing, tachograph management were slow to be implemented. The requirement for Ministerial approval for implementation of changes necessary to protect both the commercial fleet sector and the staff of the RSA created a delay which resulted in uncertainty and confusion within the industry.

2. Across the economy it is incumbent on government to ensure that the regulatory frameworks within which companies operate are fit for purpose. Covid-19 hit the world economy with very little notice and sectors such as forestry were capable of substituting imports when supply lines became strained, creating alternative sources of employment when non-essential businesses were forced to close and improving Ireland's ability to be self-sufficient in a critical raw material. Yet throughout this entire period a regulatory crisis played out and has yet to be properly addressed. It is essential that lessons be learned from this to ensure that all business, in all sectors, operate within a fit-for-purpose regulatory environment that enables proper oversight of the sector without interfering with the supply chain.

3. During the course of the Covid 19 pandemic it came to light that there needs to be increased focus on where the State and businesses source their products. The pandemic commencing in different regions at different times has meant severe complications for the manufacturing and production processes. The complexity of the supply chain means that more education and training must be provided to ensure a better understanding for all stakeholders. Having a plan 'B' is essential in preserving the supply chain integrity. Whilst the world has been made smaller due to air travel and sea and rail connectivity, the fact is that if you source products closer to home there will be less supply chain complications in the event of a crisis. Indigenous manufacturing and support for this should be considered as a Government strategy particularly for essential products such as PPE, Medical equipment (Ireland are leaders), building material for temporary structures etc. We need to consider the critical list of goods, where do they come from and how do they get here, who produces them and how reliant is the country on them?

4. National and EU wide emergency response committees to include stakeholders from the freight distribution and logistics sector must be established to develop a coherent emergency response plan that can be implemented effectively in times of crisis that would include, pandemics, threats to ports/airports (points of entry); bad weather events.

5. There must be more supports for essential workers and recognition for the important role of all within the supply chain including the haulage sector and their drivers. Without haulage there would be no movement of goods and it is incredible that this sector has been able to work so effectively in this time of crisis. The fact that drivers are lone workers is important but the fact that safety controls were put in place to ensure distribution centres were not impacted to support the movement of goods should be lauded.

The vaccination programme and the criteria for roll out must be reviewed in future as our drivers are as important as other essential workers and should be protected to the same degree. As mentioned already, without them the essential medicines, food, clothing and building materials, including timber would not have reached our markets. All drivers have families who have been very worried (particularly in 2020) about the safety of their family members as they travel around the country and abroad.

Are there any suggestions for policy support to address the challenges that have been experienced as a result of the covid19 pandemic?

1. The Office of Emergency Planning supports the Minister for Defence who chairs the Government Task Force (GTF) on Emergency Planning. Creating a sub-group with representation from the freight distribution and logistics sector is essential in ensuring comprehensive preparations for, and response to, all emergencies.

This sub-group should include the Department of Transport, and key stakeholders within the logistics sector. The sub-group should commence work immediately and form part of the national emergency planning in the event of future pandemics as well as for example:

- Very bad weather and accessibility issues
- Strategic ports becoming inoperable and continuing to meet the need to maintain connectivity
- Disaster planning – fuel shortage / explosions / natural disasters.

2. The HSA / RSA should be more pro-active in engaging with key stakeholders to ensure consistency of messaging. Both agencies have responsibility for work related vehicle safety and driving for work compliance. All emergencies have consequences for the welfare of employees and businesses and, as is the case with the COVID-19 pandemic, have consequences for the availability of services under their remit such as Commercial Vehicle Test Centres; Driving Test; Tachograph Calibration; welfare of workers; safety issues relating to carrying out normal duties for all within the supply chain. Guidance on the use and requirement for Personal Protective Equipment is a core part of the HSA's remit, however their lack of guidance and information on this issue in 2020 created confusion and a lack of certainty within the freight distribution and logistics sector.

3. When policy or regulations act as a hinderance rather than a support to essential economic activity so such policy and regulation undermines Ireland's ability to respond to any wider crisis that may occur. Government policy needs to be more reactive to when regulations prove to be an obstacle so that essential raw materials continue to make it into the marketplace, essential employment opportunities are maximised and that those businesses who can safely continue to operate do so to the maximum extent possible. Ireland's rural haulage sector lost out on significant potential to expand domestic activity during this crisis while timber processors imported significant volumes of timber from Scotland to keep the domestic timber supply chains open.

4. More flexibility to alleviating the expense associated with operating a commercial fleet should be forthcoming from authorities in the event of any future pandemic or similar type crisis. Particular consideration should be given to operators who, as a consequence of the crisis, have to temporarily park up their fleets, partly or wholly, because services they provide are not needed e.g., those servicing the entertainment sector, hospitality, pub and restaurants. Specific considerations should include -

In order to help maintain cash flow, provide a mechanism to refund motor tax for vehicles that are declared off the road for any full months of remaining tax covered by the period of the off-road declaration:

- During the current pandemic significant numbers of commercial vehicles have been taken off road. In the UK they have a system called 'Statutory off the Road Notice' (SORN) that facilitates a rebate of road tax for the period it is off road. In Ireland we have a system of declaring the vehicle off the road, however there is no refund mechanism. In response to this crisis, it would be a welcome relief for commercial vehicle operators that have seen a significant downturn in their business to receive a rebate for declared off the road vehicles. This would be an essential aid to helping companies with cashflow difficulties and aiding their sustainability.
- Operators will not be able to use the vehicle on a public road until the vehicles are taxed again.
- Commercial Vehicle Roadworthiness Test (CVRT) Regulations provide that where a test takes place after the due date the new certificate is only valid until the date that is 12 months from the due date of the test. For example, if the CVRT certificate expires in April 2020 and the vehicle / trailer only undergoes a test in February 2021, irrespective of the fact that it has only been off the road for the period April 2020 to February 2021 due to a pandemic or other similar crisis, the new test certificate will expire in April 2021. Therefore, a further test will have to be undergone in April 2021 adding a further cost to the owner. Exceptional times call for exceptional measures, and therefore it is recommended that in times of a pandemic or other similar crisis, there should be a legal provision which allows for either the test fee to be waived, or the new certificate to be valid for a period of 12 months (in the example outlined from February 2021 to February 2022).

BREXIT:

What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?

1. On the 24th of December Ursula von der Leyen said: “It was worth fighting for this deal because we now have a fair and balanced agreement with the UK, which will protect our European interests, ensure fair competition, and provide much needed predictability for our fishing communities. Finally, we can leave Brexit behind us and look to the future. Europe is now moving on.”

It is accepted that trade with the UK is now more complicated as a result of Brexit and that there are regulatory requirements for additional paperwork, as well as physical and documentary inspections of vehicles, all of which add additional cost and time constraints on the haulage sector. However, for a number of reasons, to date we have not left Brexit behind due to:

- UK businesses were particularly unprepared for 1st January 2021.
- Lack of industry preparation
- Stockpiling has provided a distorted view of the impact of Brexit as has the impact of the COVID 19 pandemic.
- A limited number of competent qualified customs brokers and agents has resulted in a significant reduction in volumes for the haulage sector.
- The delayed response by the EU to ratify the trade and cooperation agreement (finally done at the end of April 2021) has delayed the establishment of specialised committees whose roles it is to review the implementation of the agreement and consider easements for the movement of goods.
- The Northern Ireland Protocol and the unilateral decisions being taken by the UK to prolong easements is creating further uncertainty for businesses during 2021.
- Access to markets is important for an island nation like Ireland. Whilst a significant proportion of our haulage sector is deemed to be International, this is mainly due to the all-island nature of the haulage sector rather than the movement throughout the UK and the EU. There is a need for further integration and upgrading of systems across Government Departments / agencies in order to reduce the administrative workload on the haulage sector where the current paperwork requirements result in the duplication of effort in order to provide the information required by state agencies for imports.
- Safety and Security Declarations: Ireland must represent the Irish supply chain at European level and press for the opening of negotiations with the UK to remove the requirement for entry and exit safety and security declarations. Entry and exit safety and security declarations appear unnecessary as customs declarations and movement reference numbers (MRNs) are generated and inputted into the Pre-Boarding

Notification (PBN) system. If the safety and security declaration was taken out of the process it would deliver significant easements for the haulage sector.

2. Ireland needs to be connected to strategic ports in continental Europe to support our competitiveness within the customs union and single market. The new route from Rosslare to Dunkirk is a welcome start but the cost of the route is proving unattractive for businesses. Whilst increased freight volumes have moved between Ireland and France (mainly into and out of Cherbourg) our key markets are in Germany, Belgium, and the Netherlands. Developing strong maritime links with ports closer to these destinations is sensible and should be supported by Government policy. The UK land bridge, the traditional route for the vast majority of international haulage operators, has become more problematic because of the regulatory requirements imposed by the Common Transit Convention (CTC). In addition, the UK's changing immigration laws have brought an added concern about how foreign commercial transport operators and drivers will be dealt with in the event that, despite the best efforts of the operators and drivers, illegal migrants are found in their vehicles.

3. Everything must be done to support HGV drivers, who, in view of the importance of the supply change, must be considered as essential workers, in carrying out their duties in an effective, efficient and safe manner. Facilities for hauliers at ports must improve as a matter of urgency to take account of the following:

- Sufficient parking for dropping trailers and queuing for ferries.
- Improved social facilities for drivers to ensure that where long delays are encountered there is the ability to freshen up, have a substantial meal and rest area available that is comfortable.
- Traffic management must be supported by all regulatory bodies taking into account the obligations of hauliers to meet working time and tachograph rules.

4. The Authorised Economic Operator (AEO) facility is an important measure that recognises reliable operators and encourages best practice in the international supply chain. Additional guidance needs to be developed for AEOs with particular reference to the benefits of the AEO facility and the critical role of hauliers in the AEO operation.

5. The appointment of a Minister for State with special responsibility for International and Road Transport and Logistics is very much welcomed, however FITG believes the freight distribution and supply chain must be afforded greater recognition within Government. The Brexit Preparation funnel approach by the Government, which provided limited access to the Department of Foreign Affairs and Department of Taoiseach for stakeholders representing the freight distribution and logistics sectors, was short sighted. The impact of Brexit on this sector is profound and, whilst good engagement with the Department of Transport existed, much more engagement with the sector from other Departments with responsibility to Brexit preparation would have been beneficial for all.

6. Unaccompanied trailers safety and security declarations should be the responsibility of the carrier (the shipping company). As per Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013, shipping companies on the Irish Sea have been able to leave responsibility for safety and security declarations to the haulage sector. In practice this is not the case for movements on the short straits where carriers have taken on responsibility for this declaration. If the ferry operators took on this requirement for all movements, it would provide significant easements for haulage operations.

7. This point is linked with good environmental practices addressed at 3 above. For efficient logistics, sufficient resources should be provided at Irish Ports to manage vehicle movements and parking. Road accessibility, and departure and arrival times of ferries should be coordinated to minimise the impact on traffic congestion. Codes of practice should be developed to provide minimum requirements in order to reduce the risk of delays, the risk of traffic queues and the impact on the working time of drivers, by ensuring service providers have sufficient space and resources available to carry out their activities in a safe manner, respecting the welfare rights of commercial professional drivers. This is relevant for all stakeholders engaged in activities in Irish ports including regulatory bodies such as An Garda Síochána, Revenue and the Department of Agriculture, Food and the Marine.

8. Duplication of information required for different state agencies is not only very burdensome but is also creating confusion leading to delays at ports. Synergies between the state agencies assigned with responsibility for customs, sanitary and phytosanitary checks, immigration, and other regulatory controls need to be developed through IT systems. Communication with haulage drivers and companies must improve. In a lot of cases, particularly for unaccompanied trailers, the hauliers are not part of the customs declaration process. This results in the haulier being the last to know of the reasons for the delay and this is causing frustration. Streamlined IT systems that are fit for purpose with the development APIs that offer more flexibility should be fast tracked.

9. Residents of Northern Ireland who heretofore worked as the named Transport Manager for an Irish registered haulage business are no longer eligible to carry out this duty as they do not reside within the EU. This is not the case for residents of Ireland who are free to work as transport managers in Northern Ireland. Section 3.1 of The Common Travel Area states 'The basic principle guiding the operation of the CTA is that the Irish and UK Governments treat each other's citizens in a similar manner to enable them to freely move between the two jurisdictions, and thereby reside and work in either jurisdiction, without the need for special permission'. Associated rights, as well as ongoing cooperation between Irish and UK authorities, facilitate and support these arrangements.

The uniqueness of the land border between Ireland and Northern Ireland means that these issues are not experienced in any other EU member state. It is reasonable that the EU Commission should consider facilitating holders of an Irish issued Transport Manager CPC qualification, working in Ireland but living in Northern Ireland, to act as the nominated Transport Manager for an Irish (EU) registered haulier.

How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?

1. The importance of a stable political environment is critical to the delivery of trade easements under the trade and cooperation agreement. In the first instance, establishment of the Partnership Council and committees is important in implementing the bi-lateral structures that can consider issues raised. A specialised committee for transport will consider over time the practicalities and realities of trading between the two blocks. Until these institutions are established little progress can be made in listening to the concerns of industry and the development of practical solutions that appeal to all parties.
2. The political will on both sides needs to be evident to assist with the delivery of more efficient trade flows between the two blocks particularly in the area of products of animal and plant origin.

LABOUR MARKET SKILLS:

The freight distribution and logistics industry is a vibrant and vital sector for the economy of Ireland, contributing in excess of €1billion a year to the exchequer in the form of PAYE, PRSI and road taxes.

Driver Shortage

The shortage of HCV drivers in Ireland, and indeed across Europe, has been well documented. The consequences of Brexit and COVID-19 have had a further detrimental impact in terms of the timber haulage sector's truck fleet operators who cannot recruit enough EU drivers to meet their demands. One location that is ripe for sourcing drivers is South Africa where, as in Ireland, they drive on the left-hand side of the road and the population is English speaking. At present four countries outside of the EU/EEA are covered by mutual recognition agreements for CE/C1E driving licences – South Africa, Australia, Japan, and South Korea.

- The list of countries covered by mutual recognition agreements for CE/C1E driving licences should be extended to include countries where there is clear evidence that Ireland has appealed to their residents as a working destination for other trades e.g., the Philippines and India.
- As a consequence of Brexit many HCV drivers from within the EU who have been working in the UK are returning to their home nations. The Irish State should do more to entice such HCV drivers in the UK to move to Ireland for work rather than return to their home nations.
- There are too few young people embarking on a career in HCV driving. The industry needs to become attractive from a remuneration and professionalism perspective. Government and industry need to work collaboratively to help rebrand the industry and promote HCV driving as an attractive and viable career choice. FITG in conjunction with FII, IRHA and FTAI is actively engaged in raising awareness of the issues to help make this happen.

The transport sector in particular has been less successful than others in recruiting younger workers. There are many reasons for this, including a perception that it is made up of predominantly low skilled jobs, working hours are long, unsociable, and unpredictable, and very often there isn't an obvious career path. This perception must change. Unfortunately, because of this perception the transport and logistics sector is suffering from a serious skills shortage across all levels which hinders progress and makes dealing with change within the transport and logistics sector extremely difficult. We need to question why there is a skills shortage in the first place.

The labour needs of the freight, transport, distribution and logistics sector are developing as forecast in the 2015 EGFSN report. At the time of 2016 Census there were 49,470 people working in this field. In the absence of a major external shock the labour needs of the sector are expected to increase to 66,204 by 2025. Given the age profile of people working in the sector, approximately 13,752 of those currently working in the sector are expected to retire by 2025. In summary, a total of 30,486 individuals will have to decide to take up careers in the sector and receive all the necessary training between now and 2025 in this baseline scenario.

Table below is page 103 of the report <http://www.skillsireland.ie/Publications/2015/18022015-Freight-Skills-Publication-pdf.pdf>

Table 7.9: Baseline employment, forecast demand and shortfall by core FTDL occupations

	2011	2020 Demand		Shortfall 2020	
	Baseline	Recovery Scenario	Delayed Scenario	Recovery Scenario	Delayed Scenario
HGV drivers	19,758	25,201	23,920	8,406	7,125
Mobile machine drivers & operatives n.e.c.	5,426	6,921	6,569	2,230	1,879
Managers & directors in storage & warehousing	4,071	5,193	4,929	1,430	1,166
Managers & directors in transport & distribution	3,497	4,460	4,234	1,381	1,154
Fork-lift truck drivers	3,074	3,921	3,722	1,135	935
Transport & distribution clerks & assistants	2,767	3,529	3,350	951	772
Aircraft pilots & flight engineers	1,622	2,276	2,117	765	606
Other drivers & transport operatives n.e.c.	1,278	1,630	1,547	583	500
Air transport operatives	1,135	1,593	1,482	529	417
Rail transport operatives	999	1,274	1,209	393	329
Train & tram drivers	670	855	811	229	185
Ship & hovercraft officers	623	747	719	230	202
Marine & waterways transport operatives	543	651	626	190	165
Importers & exporters	332	423	402	148	126
FTDL-14	45,795	58,676	55,636	18,601	15,562

The FTDL-14 encompasses four categories of road freight drivers: HGV vehicle drivers, fork-lift truck drivers, mobile machine drivers & operatives, and other drivers & transport operatives. These four categories comprise approximately 60% of the total baseline supply.

The shortfall as a percentage of 2011 employment conveys the quantity of labour needed relative to the baseline quantity. The results are set out in Table 7.10 below. The occupation-level shortfall rates range from 28% to 37% in the Delayed Adjustment Scenario and from 34% to 47% in the Recovery Scenario.

The demand for HGV drivers also ranks highly in terms of relative shortfall: 5th highest, at 43%, in the Recovery scenario and only one point lower than the highest, at 36%, in the Delayed Adjustment Scenario. This reinforces the need for additional drivers in almost any economic scenario. Indeed, even with no change in output, there would be a shortfall of some three thousand HGV drivers resulting from retirements.

In 2019, Chao Ji-Hyland and Declan Allen from School of Management, College of Business, Technological University Dublin (TU Dublin), published their research study titled 'What do professional drivers think about their profession? An examination of factors contributing to the driver shortage'. In it they reference McKinnon et al. 2017, 111, who highlight that entry-level logistics roles (including drivers) have lower pay and lower status than entry-level positions in other industries, creating an unattractive proposition for skilled workers.

The driver shortage is not a new phenomenon, as it has been well documented a varying level of severity over the past 20 years. What is clear is that function of distribution is critical to efficient logistics and is often taken for granted. The cost associated with transportation is close to 55% of the total cost of logistics. A driver shortage hinders supply chain performance and increases costs that ultimately impact the consumer.

In 2017, a new research study for the EU TRAN Committee – 'Road Transport Hauliers in the EU: Social and Working Conditions' was published. The report has reiterated that drivers in the freight transport industry across Europe felt that the quality of various aspects of their role had deteriorated in recent years, including the standard of their working environment, income levels, the amount of non-standard and standard working hours, and the skilled work involved, creating issues around driver retention. Recognising the issues is critical in determining what solutions are needed to counter the driver shortage problem. If drivers themselves do not get job satisfaction and feel secure in their roles it becomes increasingly difficult to promote the profession to new entrants. But this is not the only issue. A level playing pitch for compliance with how drivers are paid needs to be considered. There is anecdotal evidence that drivers will move jobs for increased cash in hand, based on subsistence payments, that are not necessarily due. This has the consequence of facilitating reduced PAYE and PRSI payments to the State as employers keep the official wages low whilst subsidising the total payments with subsistence payments. Paying drivers for extra shifts outside of normal working hours is becoming more of a problem as drivers are using double tachograph cards

to cloak all their weekly driving activity. The link must be made between effective enforcement of the Minimum Wage Act, working time and tachograph rules and correct payment of taxes by employers. The fact we need to mention this highlights the importance of a level playing pitch that is supported with effectively resourced enforcement. The net result if this is done right will deliver a more professional and compliant haulage sector.

The TU Dublin report cited earlier also highlights those other issues for consideration in the appeal of driving jobs is the demanding and irregular nature of work schedules as a burden of the occupation. Drivers found their erratic schedule put a strain on their ability to balance work and family life.

Some of the key findings of the 'What do professional drivers think about their profession? An examination of factors contributing to the driver shortage' research paper highlights the issues to be considered in delivering solutions. The paper is included in the annex of this submission and the key findings are:

- 16% of drivers who are working in excess of 60 hours a week are doing so for financial reasons.
- Remuneration of professional drivers is a matter mentioned by all interviewees as being detrimental to recruitment and retention. The level of pay and benefits provided to drivers was frequently the first area identified by participants
- 44% stated they became drivers due to their love of driving whereas less than 13% stated that they chose the profession due to the benefits of the role (flexible hours)
- Several factors were identified as contributing to a negative professional experience for drivers; pressure to fulfil on-time deliveries, rigorous regulations and extended time spent on the road
- All participants referred to the loneliness that they can experience, because of long hours away from home. Irregular work schedules and unfavourable views held by the public towards drivers are other issues identified through the data collection as unsatisfactory elements of the profession. Drivers need to be treated with more respect and dignity.
- The poor standard of facilities provided to drivers (the country's service stations) was an issue frequently mentioned.
- Most of the participants felt that very little regard was given to their health as no facilities are provided at service stations for exercise, no education is provided to them on how to maintain a balanced diet, and no institutional support is provided to promote positive mental health

A tangible way to bring about a change in the perception of the sector is to invest in training and education. Training and education, upskilling and continuous professional development must become the norm and not the exception if the sector is to succeed into the future. Industry must truly commit to adding value to careers in their companies and making them attractive to young people.

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.

Haulage sector employers must take responsibility to better promote their businesses and learn to compete for potential employees. Key to attracting people into the sector is making it easy for people to understand the available roles and the career progression opportunities linked with the

haulage sector. The Logistics and Supply Chain Skills Group is working on mapping out available roles and developing outreach programmes supported by logistics champions that will aid the generation of awareness of the industry.

The Managers Guide to Distribution Costs Report 2020 shows that it is taking over 29 days to fill vacancies and the skills shortage is costing employers over €20,000 in additional costs. The report highlights that there is a gap in the perception that roles are poorly paid with the reality that driver's salaries rose in 2019 by 4.2%, to €35,839 on average, before subsistence payments.

The following should be considered in developing a strategy to encourage more people to take up work in the road haulage sector.:

- Employers must promote their businesses in a more positive manner.
- Driver's welfare must become more prominent within terms and conditions of employment.
- Employers who exploit drivers through cash in hand; encouraging working time contraventions and no contracts of employment need to be identified and be subject to enforcement procedures. Evidence of this activity can be determined through more robust auditing of operators.
- Link qualifications on the National Framework of Qualifications (NFQ) with the profession of professional driving:
 - Support the establishment and delivery of the Level 6 Transport Operations and Commercial Driver Apprenticeship
 - Clearly identify all education and training programmes for the haulage sector.
 - Continue to develop ties between academia and industry.
- Employers must ensure that they have competitive terms and conditions for drivers and other roles that support loyalty within the workforce.
- Better enforcement of non-compliant operators:
 - Fuel laundering
 - Working time issues
 - Subsistence abuse
 - Brexit issues with imports/exports via NI due to lack of enforcement
- The average size haulage business is less than 6 trucks. These Small to Medium Sized businesses are traditionally family run. The State can support better succession planning for this cohort through guidance and supports, similar to what Teagasc has done for the farming community. With the average age of drivers now increased to over 50 years of age, and in a lot of cases including the business owner, these family businesses need to understand how to encourage younger siblings and/or offspring to get involved in the family business, or at least give them the option and give the younger family members an opportunity to gain experience in the business without having to relinquish ownership.
 - This is also a great opportunity for the Driver Apprenticeship to be considered as a pre-requisite necessary to support effective succession planning.

- Consignor Liability – Much more needs to be done to raise awareness within the consignor cohort of their legal and moral obligations when it comes to procuring third party haulage services. Consignors have a vested interest and legal responsibilities in ensuring that their hauliers are operating to the highest professional standards, but some turn a blind eye to such things as working time compliance, roadworthiness of vehicles, and overweight vehicles, instead focusing on contracting the cheapest service. The HSA, through its own activities and the work-related vehicles safety committee, and the RSA should develop a robust campaign highlighting (and then reminding) consignors of their obligations in these matters.
- Training programmes should be developed to support consignors' understanding of their legal obligations when procuring third party haulage services.

How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?

The profession of a HGV driver suffers from an image problem with low pay, long and unsocial hours, poor work environment and lone working sited for this perception. The current driver pool is ageing with an average age of over 50 years of age. The consequence of this is far reaching and will have a detrimental impact not just on individual organisations, but on the forestry industry and the freight distribution and logistics sector as a whole in a number of years if the issues aren't dealt with urgently. Driving can also be a physical job with some requirement for loading and unloading, therefore it doesn't always sit well with an ageing work force. It is also important for employers in terms of managing safety and health and wellbeing of their staff that they are considerate of the physical demands the job imposes on their employees. This is assessed during periodic risk assessments. The obligation to do this would suggest that it would be in employers' interest to have a career path mapped out for their drivers with options to move roles within the organisation where possible. The challenge of course is how to attract young people into the profession of driving. The traditional way of getting involved was through family links and succession into the family business. This has changed. Offspring no longer see the job as attractive.

This must change:

- The haulage sector must start promoting their own profession.
- There should be a focus on the aesthetics of the profession of driving. How drivers are presented, do they have uniforms, is personal hygiene of importance to the employer, what PPE is provided to drivers, and is it maintained to a high level.
- Drivers have a significant customer care role. They are the face of the business. how they present themselves and interact with customers and the public is hugely important in defining the perception of the industry.
- All within the supply chain need to be educated and understand the role of a professional driver. Mapping out the day-to-day role of a driver, through case studies, and presentations by drivers is important in creating awareness of how varied, difficult, and rewarding the job is at the same time as developing respect for the position.
- Employers and stakeholders need to improve their communication with drivers to ensure that they understand if there will be delays, why this is the case. When there are gaps in the communication process it creates frustration for drivers who are obliged to work within the working time directive and tachograph regulations.

A point that is linked with raising awareness of the profession and that creates a true perception of the industry is the importance of detailing the job opportunities within the supply chain including the haulage profession in secondary schools. Creating awareness of the role of professional drivers to young people may sow a seed of interest in a profession that may not otherwise have been considered. The apprenticeship programmes are supporting outreach to secondary schools through organised events and access to career guidance professionals. The Logistics and Supply Chain Skills Group is developing opportunities to get access to schools in this regard.

How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?

Developing a consistent and sustainable outreach to secondary schools and further education providers is important in highlighting the diversity of roles and opportunities that exist in the freight distribution and logistics sector including the haulage sector. Developing a strategy to create awareness within schools through transition year initiatives is one example that can deliver interest in the sector. Working collaboratively through stakeholder committees is also essential in creating a common approach to developing awareness of the sector. This has started in 2018 through the addressing the future needs report and is continuing through the Logistics and Supply Chain Skills Group.

More support is required for the establishment of training programmes and apprenticeships that support the haulage sector. The commercial driver apprenticeship delivered by Sligo IT (lead proposer FTA Ireland) is scheduled to start in January 2022. This apprenticeship will offer significant opportunities through the recruitment of a project manager to highlight the benefits of commercial driving as profession to students in secondary schools, parents of those students and the career guidance professionals. The Logistics and Supply Chain Skills Group must also harness this opportunity and work collaboratively broadening the scope and outreach of the Group in line with the development of this programme. The experience of the Logistics Associate Apprenticeship and the outreach from the project manager is a prime example of how successful this approach can be. There are over 90 students registered to start first year of this apprenticeship in TU Dublin and Munster Technological University in September 2021.

It may be useful to look at and adapt other educational programmes to the haulage sector. One such example could be the recently launched Ambassador Programme which promotes forestry as a career to secondary school students. The group behind this programme is called Forestry Careers Ireland and was launched in 2019. Link to launch: https://merriestreet.ie/en/news-room/releases/doyle_launches_the_society_of_irish_foresters_ambassador_programme_in_co_wicklow.html

The haulage sector is changing apace. Technological advancement is ensuring that the industry is becoming more efficient and delivering for the environment. The haulage sector has traditionally been male dominated, however, better promotion of careers within the sector as well as new innovative practices means it will become more appealing generally as a viable profession, with less gender stereotyping. Also key to the future success without doubt will be the prevalence of drivers that self-promote their profession.

ROAD SAFETY:

Driving for a living is a high-risk occupation with the likelihood of being involved in a road traffic incident is 40% higher than it is for other road users. Understanding rules of the road and adhering to the road safety rules in the jurisdiction you are driving in is a basic requirement for all professional drivers. Since its inception in 2006, the RSA, through effective media campaigns, has been hugely successful in bringing to the fore the importance of road safety. For commercial fleet operators there is a myriad of legislation and guidelines that must be observed such as speed limits, weight limits, roadworthiness of vehicles, working time and tachograph regulations, intoxicated driving, safety, health and welfare of drivers, operator licencing and rules for international transport. The employer must ensure that their employees meet their legal obligations for the safe operation of their vehicles, and drivers must understand and respect road safety obligations which impact not only themselves but other road users, as well as the need to safely secure and protect their loads.

Between 2003 and 2012, almost half of the 573 reported deaths arising from workplace accidents were vehicle related. The workplace for haulage drivers is the cab of their truck. Creating more awareness around the implications of poor driving behaviour for the safety of the driver and other road users is one of the main areas that should be focused on within this section of the strategy. Linking health and safety and road safety with good clear guidance and information specifically for the haulage sector will go some way to supporting improved road safety.

The haulage sector operates on very tight margins and is intensely competitive. For a level playing pitch, where all operators are adhering to the rules around working time, tachograph requirements and roadworthiness for example, there must be effective enforcement. For effective enforcement the authorities charged with regulating the industry must be sufficiently resourced. In the instance of enforcing tachograph and roadworthiness rules, the RSA is the competent authority but only has 16 Transport Officer/Vehicle Inspectors. These Inspectors powers are limited in that they must be accompanied by a member of An Garda Síochána at roadside checks, therefore they need to be well planned and organised which offers limited flexibility. Unlike some other jurisdictions there are no powers to immobilise vehicles where there are issues with cabotage, roadworthiness or tachograph. As the EU Mobility package is being introduced on a phased basis, with new requirements for posting of workers, cabotage, operator licencing for van operators a review must take place in Ireland of the powers afforded to the RSA inspectors.

Having a body that is responsible for the sector would assist in creating a more dynamic approach to effective enforcement, a greater understanding of the rules around compliance, and the development of effective outreach programmes for mutual benefit.

The inadequate number of RSA Transport Officer/Vehicle Inspectors is exploited by non-compliant operators which in turn has the impact of creating an uncompetitive environment for the businesses that place an emphasis on compliance and invest in training and education of their drivers. This in turn has the further consequence of creating a 'black market' that thrives on beating the system whilst at the same time making the sector unappealing to new entrants.

The current driver shortage in Ireland is not unique, it is a familiar sight across the UK and the EU. Protecting workers rights, having a level playing field with reasonable rules and fair and effective enforcement are all necessary to ensure the sector is healthy and safe. This is critical in delivering a future for the haulage sector (for whom Ireland will remain reliant to deliver goods) that thrives into the future.

What are the road safety priorities in road haulage for the next 10 years?

1. Adapt the Driver CPC training programme to allow CPD (Continuing Professional Development) that would allow specialised in-house training to qualify for CPD points or credits on CPC modules. This could be in the areas of on road driver (eco) training, safe and secure loading training, tachograph training etc.
2. As technology advances and new fuelling technologies are introduced such as CNG, LNG, Electric and Hydrogen new road safety campaigns and guidance should be developed to promote the effective and safe driving practices and utilisation of the new technologies. For example, electric vehicles are automatic and have increased acceleration, guidance and specialised training for these vehicles should be promoted.
3. Develop more engagement with commercial fleet operators to ensure road safety messages are aligned and filtered down to all organisations, through the establishment of a road safety industry working group.
4. Fair and effective enforcement is critical to compliance, with the deterrent effect of law enforcement directly related to the perceived certainty of detection and punishment. Prosecutions for tachograph and roadworthiness offences are rare. More effective enforcement through the use of Graduated Fixed Penalties should be introduced and utilised as appropriate by Transport Officer/Vehicle Inspectors and An Garda Síochána, as more effective enforcement would increase compliance with roadworthiness of vehicles and tachograph and working time regulations.
5. The level of enforcement must be such as to act as an incentive to non-compliant operators to either change their ways or stop operating. Responsibility to reach the required levels of enforcement to achieve this fall to both the RSA and An Garda Síochána. Relevant training, equipment and allocation of Garda resources is a prerequisite.
6. Review the CVORI and publish annual findings in relation to the state of compliance of commercial vehicles, including the key roadworthiness issues, as well as the results from premises inspections.
7. Carry out a media campaigns on the correct use of lighting for vehicles to include flashing amber light usage, lighting for abnormal loads, blue lights, doctors, fog lights etc. Provide clear guidance to ensure the safe use of lights and create awareness as to what the different safety lighting is for.
8. The RSA should develop stronger links with industry through consistent engagement with trade associations and collaborative outreach programmes.
9. Promotional activities of good eating habits and the links with improved road safety should be developed for the haulage sector.
10. Working with industry to create awareness of the risks associate with driving a HGV should be prioritised with a focus on those that contract these services and to include issues such as;

- a. Driver Behaviour and what influences poor behaviour.
 - i. Lack of understanding of reasons for delays.
 - ii. Unnecessary delays with no explanation
- b. Working time / Tachograph rules for drivers
 - i. Impact of delays on the road
 - ii. Impact of delays at delivery sites
- c. Importance of good communication with drivers
- d. Importance of good communication between the employer and drivers

How are these priorities best addressed?

1. Industry engagement should involve representative trade associations, relevant government departments, RSA, H.S.A. Clear terms of reference should be developed, and annual priorities and actions agreed to improve road safety. An annual report on progress should be published.
2. Industry review of the Driver CPC training regime. Examine and explore CPD opportunities and develop consensus for change.
3. Specific actions should be developed with clear departments of responsibility. As mentioned, active engagement with stakeholders should be encouraged. For each point, stakeholders must be identified and approached to work collaboratively towards achieving the desired outcome.
4. A cost benefit analysis should form part of a prioritisation and assessment of actions under the Strategy.
5. Necessary provision of resources for the RSA to recruit additional Transport Officer/Vehicle Inspectors.
6. Necessary provision of resources for An Garda Siochana to increase the numbers in the road traffic core with commercial vehicle expertise.
7. RSA to appoint a liaison for the freight distribution and haulage sector.

What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?

- Regular engagement with stakeholder that are willing to work with the authority.
 - Inclusive of not just the haulage but own account sector
- RSA to appoint a member of staff with the sole responsibility for liaison with the freight distribution and haulage sector.
 - The CVORI needs to be re-invigorated to establish trust within the industry that it is a scale of compliance and something that should form part of all conscientious operator's operation compliance targets. (A lot of work was done in the early days in relation to the rollout of CVORI and to highlight its importance, however, an absence of ongoing communication has resulted in an understanding of the relevance to industry being diminished.)

What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?

All operators irrespective of size are bound to operate under the same rules and regulations. Small operations have the same obligations to safety as larger businesses. However, the rules at both national and European level are both numerous and subject to regular change (e.g. Mobility Package), making it is increasing difficult for all operators, as well as enforcement authorities, to keep up to date with the requirements. Where businesses adapt and adhere to the changed requirements and other don't, an uncompetitive environment is created. More must be done by the State to ensure a level playing pitch and to support all business, both large and small, that invest in compliance.

- Road traffic, and other legislation relevant to the haulage sector, is extremely difficult to follow because of its complexity and the fact that it is fragmented as a consequence of numerous amendments.
 - The legislation should be consolidated with a view to ensuring:
 - It is relevant for the times we live in.
 - The language used is more easily understood.
 - It is segmented in a structured and organised manner making it easier to follow.
 - Legal obligations are easily identifiable and the legal consequences for non-compliance are clearly set out.

- The RSA, HSA and other stakeholders should work collaboratively with the haulage sector to provide sector specific road safety education campaigns covering such topics as:

- Speed compliance
- Intoxicated driving
- Distracted driving
- Fatigue and the taking of rest periods
- Safety at service stations
- Medical fitness to drive and the importance of healthy eating habits
- Safe and secure loading

Do you have any other comments on road safety matters?

- Traffic commissioner – work with Dot / H.S.A and RSA to develop commission arrangement to effectively deal with non-compliant operators
- Graduated Fixed penalties – enable the Gardai to take on the spot fines for infringements in tacho / minor roadworthiness issues – reduce the burden on the court system so it can deal with more serious issues and encourage more compliance on the minor issues
- More safe and secure rest areas on national routes.

CLIMATE/DECARBONISATION:

In 2014 Ireland and other EU countries agreed to reduce greenhouse gas emissions by at least 40% by 2030 compared to 1990 levels. This is a challenging target and Ireland's National Mitigation Plan outlines a number of measures which includes increasing forest cover, replacing fossil fuels with biomass and reducing emissions in other sectors of the economy. Agriculture and transport account for over 50% of greenhouse gas emissions and adaption and mitigation measures are required.

Ireland's forests are projected to contribute up to 2.2 million tonnes of CO₂ equivalent to its annual emission targets under flexibilities introduced under the EU Effort Sharing Regulation. In order to achieve government policy in this area and for Ireland to reach its international commitments under the related headings, it is essential that continued investment in the road network takes place.

Roundwood haulage in Ireland is carried out by a diverse fleet of logging trucks owned by a mixture of single truck and multi truck hauliers. Currently these hauliers are employed to remove timber from forest stands, both private and state owned and deliver it to board mill, sawmill, and energy wood customers. Much of the forest stands in Ireland are in mountainous areas that are connected by narrow roads and this requires skilled drivers who negotiate these difficult routes with specialised roundwood haulage vehicles that can be loaded to 46 Tonne Gross Vehicle Weight. This sector needs a clearly defined fit for purpose solutions that support a sustainable transition to alternative fuels.

The forestry industry will need clear guidance and information as to the viability and availability of alternative fuels that will be suitable for this sector. In addition, impartial analysis of available technologies should be provided to assist forestry operators to understand what alternative technologies are available and suitable for their needs.

It is reasonable to assume that for new technologies to be introduced they must make business sense, be sustainable (in the sense that they are not short-term solutions) and most importantly affordable. The average age of a commercial vehicle in Europe is 11.6 years for vans, trucks 13 years and buses 11.7 years.¹

It is important to note that the points outlined do not divert from the position that those that continue to operate Diesel commercial vehicles must be supported to ensure they do not face an unfair competitive environment. This will occur due to the increased cost of Diesel and the Government policy to increase carbon tax substantially over the coming years. The fact remains (and will be reiterated during this submission) that the commercial Heavy Goods Vehicle Fleet will not be able to transition to alternative fuelled vehicles en-masse because the rolling stock of alternative fuelled vehicles is not available, the refuelling sites do not have the infrastructure necessary to support the transition.

Heavy Goods Vehicles (HGV) – Vehicle Category N2 & N3

To encourage investment in more expensive alternatives to diesel, a refuelling infrastructure must be available to the transport fleet that is on a par with the current fossil fuel infrastructure, i.e., consistently available and in working order. Ireland is a small country that can lead in improving air quality and reducing emissions in transport alongside a sufficiently resourced and appropriately regulated afforestation and reforestation programme. However, realistic transition deadlines must take account of lack of viable alternatives, production and availability of alternative fuelling technology, the cost of the infrastructure and the global availability of the technologies. This is particularly true with forestry vehicles.

Forestry Heavy Goods Vehicles need to haul large volumes over challenging terrain. Diesel has served this industry well over the years and alternative powertrains need to match and possibly exceed this fuel's operational efficiency in the forestry supply chain. Whilst there are a number of options available to improve emissions including Euro VI engines there is no one easily identifiable short to medium term solution for transition. Environmental improvements should be concentrated on the reduction of harmful pollutants from vehicle exhausts by changing, for example from E3 to E6 engines.

CNG fuelled vehicles save approximately 28 tonnes of Co2eq per vehicle each year. As this fuel is available it should be supported in a more public manner as a transition and a viable solution for operators as they plan for net zero. For every 100 CNG trucks, emission savings can be 2,737 tonnes Co2eq per annum which is a substantial improvement and can deliver immediate benefits. However, if CNG trucks are refuelled with Biomethane, it would see a reduction of 152 tonnes of Co2eq each year. For every 100 CNG trucks fuelled with Bio-Methane savings will be 15,111 tonnes of Co2eq per annum.

¹ <https://www.acea.be/statistics/article/average-vehicle-age>

Support is needed to develop a culture of understanding the benefits of reducing carbon footprint. Initiatives such as the Freight Transport Association of Ireland's TruckSafe Green standard should be recognised as developing a culture of compliance and management of fuel that requires an annual audit of eco driver training, improved vehicle efficiencies and integration of alternative technologies into the fleet. The cost of alternative fuelled vehicles is more expensive than the diesel equivalent. Continued incentives to purchase the more expensive more environmentally friendly vehicle is important to support transition. Support is also needed for:

- Pilot projects addressing alternative fuels.
- Further toll charge reduction incentives.
- Development of Biomethane that can deliver sufficient BioGas into the grid.
- Cleaner liquid fuels need to be incentivised through reduced taxation.
- Sensible 6 x 2 HGV options to reach 46mt capacity.

While it is recognised that the focus in this section is on transitioning towards sustainable fuel sources, Ireland's timber haulage fleet is at a significant disadvantage in that most journeys start on the tertiary road network. As this portion of the road network has suffered from a lack of investment over many years so it is no longer possible for vehicles to operate on these roads efficiently. If vehicle efficiencies are to be targets, as they must, then it is just as important to ensure that vehicles of whatever fuel source can operate efficiently to begin with. For this reason, it is important that greater effort is made to renew and upgrade the existing tertiary road network in a targeted manner so that hauliers can operate in a manner that maximises the efficiencies of their vehicles and remove unnecessary fuel burn and resultant emissions.

In order to transition to EVs or other reduced carbon alternatives the following must be considered:

- Available and serviced multifuel infrastructure.
- Workforce educated in delivering and maintaining a zero-carbon vehicle and fuelling infrastructure.
- In depth training for drivers on new technologies.
- Regulatory framework for alternative fuelling technology and vehicle maintenance infrastructure.
- Available, working electric charging points.
- Investment in future proofing the energy grid i.e., gas grid to support potential for green hydrogen in the future.
- Trade apprenticeship needs to be expanded to plan for future technologies.
- Upskilling in short period is cost prohibitive for industry if not supported by grant aid and tax rebates.
- Garage and maintenance facilities that can deliver support.
- Driver training for alternative fuelled vehicles.
- Information on available supports.
- Targeted investment into the tertiary road network to make it ready for EV use.

FUEL EQUALISATION

From 1 May 2021 the carbon charge on certain mineral oils and vehicle gas increased from €26 to €33.50 per tonne of CO₂ emitted.

The current rate of excise applied to natural gas for transport use should be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 30% of the HGVs and Buses national fleet extend the low excise rate of €2.60 per GJ on natural gas as a vehicle fuel to allow for delays to infrastructure provision and to allow for vehicle purchase decision cycles

FITG is calling on the government not to increase diesel fuel duty for commercial vehicles, to ensure that the timber haulage sector in Ireland can continue to trade cost-effectively in a post-Brexit environment. Currently, the rate of excise charged on petrol is 58.7 cent per litre, including a 4.6 cent carbon charge. The corresponding rates for diesel are 47.9 cent, with a 5.3 cent carbon charge. Fuel Equalisation is being touted as the solution to air pollution and on the private motorist reliance on Diesel fuelled cars.

Fuel costs now represent a third of the total cost of the operation of an articulated lorry. Additional increases in fuel costs would need to be passed on to customers, which could mean the death knell for new trading partnerships and a severe restriction on potential trading expansion for shippers, at a time when they need as much support and stimulus for trade as possible.

Rather than increasing fuel tax across the board on the logistics sector, FITG is calling on government to incentivise the industry to run its vehicles in the most fuel efficient and environmentally friendly way. The freight industry is under continued pressure from legislators, consumers, and society to improve efficiency and reduce carbon emissions. With existing support from Enprova and SEAI, essential users can improve their fuel performance and thus reduce their emissions. The big benefit of improved fuel performance is firstly to the operators' bottom line as profit; but government can send a strong signal to operators that fuel performance matters to improve air quality as well, with a CO2 tax discount based on improved performance. The majority of timber haulage vehicles in Ireland are fitted with ORBCOMM Telematics. Gathering such performance data offers the opportunity to underpin future Government Policy with hard data from the industry itself, on elements such as vehicle choices. Developing a culture where the operator is improving fuel efficiency will automatically translate to future adaption by the industry of alternative fuel technologies. Support and incentives must be provided to industry to this end. In addition, there should be tax breaks for alternative fuel vehicles that are suitable to use in the timber haulage sector.

ROAD INFRASTRUCTURE:

Timber Haulage

With an approximate 330 timber lorries on the road today, there are now more timber truck movements per day in Ireland than there are for cattle truck movements such is the increasing importance of the sector. It has been calculated that the current fleet contributes in excess of €17 million per annum in direct taxes, fees and levies to central funding. This is not including any indirect contribution that would emanate from the wider activities and support related to this fleet.

It stands to reason that if timber volumes are to double over the coming decade as is forecast, then this direct contribution will also increase to a similar extent. However, assuming some efficiencies are achieved, and the increased contribution is only 75% above the current levels, this would still result in central exchequer funding increasing to €29.9 million per annum in 2035. Again, this revenue emanates only from the timber truck fleet, before the other required high value activities are considered (e.g. harvesting contractors, sawmill activities, post processing activities, etc).

Looking at this another way, there are an expected 120,000 timber truck movements in Ireland in 2017. By 2035, this figure is expected to rise to 260,000, an increase of 140,000 movements which will have to be matched by increased direct and indirect employment and related taxes and duties.

Road Network

The Irish road network is comprised of over 5,600km of National Road, 13,100km of Regional Road and approximately 79,000km of Local Road. Ireland, when compared to other European countries, has a very extensive public road network that is supported by a relatively small population. Most roads have evolved from tracks that subsequently received thin layers of tar and stone. Unless these roads have been improved, with strengthening layers, they are generally not able to bear heavy loads.

The investment in non-national roads has dramatically reduced in the past 10 years. Good practice is that 5% of the road network should be strengthened each year and 5% of the road network should be surfaced each year. At present the actual figures for these indicators are below 2.5%. We are therefore spending less than 50% on the maintenance of our road network than that which is required for us to simply maintain the network.

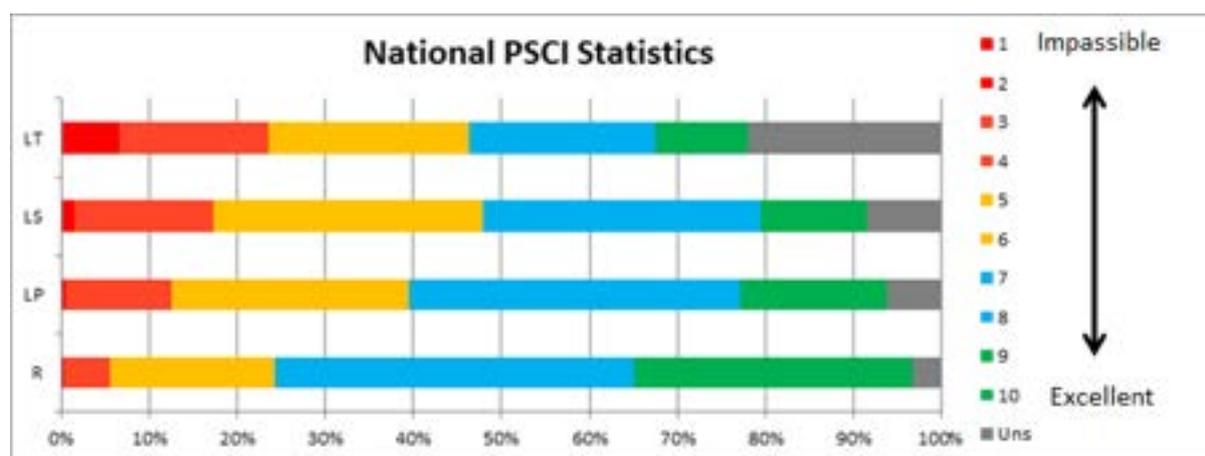
Direct Taxes & Levies Paid by the National Timber Haulage Fleet Per Annum	
Total Fuel Costs	€ 19,629,225
Total Fuel Duty Raised	€ 9,128,924
Total Fuel Duty Rebate	€ 171,518
Net Contribution - Fuel	€ 8,957,406
Total Road Tax	€ 297,000
Gov't Insurance Levy	€ 90,750
Total Haulage Licence Fee	€ 14,850
Taco Calibration	€ 33,000
Total Annual Test Fee	€ 59,400
Direct Employment	
Total Earnings	€ 13,728,000
Employment Taxes	€ 3,088,800
Total Contribution to State (exc direct empl't)	€ 9,452,406
Total Contribution to State (inc direct empl't)	€ 12,541,206
Total Contribution inc VAT	€ 17,115,006

Figure 1 - Source: The Irish Forest & Forest Products Association

Forests are often located on the local secondary and tertiary roads. Although, overall, Ireland is only spending 50% on road maintenance compared to what it should be to maintain the network, this figure is even less on our secondary and tertiary roads. These roads have low levels of traffic on them due to the small number of properties and farms located there. As such their current condition, although not of a high standard, is fit for purpose for the everyday traffic levels that they encounter.

All roads authorities have surveyed their local road network. All roads have been assigned a Pavement Surface Condition Index (PSCI). This index varies from 1 (Road Impassable) to 10 (Perfect Road Conditions), left to right in chart. The results of these surveys show the following results:

A quick analysis of these surveys show that the almost 50% of the local secondary and tertiary roads have an index less than 6 which indicates the need for repairs to the road structure. Introducing heavy timber loads on these roads will only make a bad situation worse.



Solutions

The present situation cannot be allowed to continue. Forest owners, especially the private owners, are currently delaying the harvesting of their trees due to concerns regarding not only the ability of the road network to cater for their transport needs but also concerns that they will have to bear the cost of road repairs on roads already suffering from a lack of investment. Road authorities have no choice but to ensure any damage caused to their road networks are repaired by the people responsible. Equally, forest owners put forward the argument that the road network must be capable of handling the modern demands being asked of it and with a burgeoning forest estate becoming increasingly productive the rural road network, that is already suffering from a lack of investment, must be improved so that it may handle the demands being placed upon it. This is no different than has happened in previous decades that witnessed agricultural activities modernise and demands on the road network change.

Fundamentally, funding for road maintenance is so inadequate it is not possible for road authorities to cater for any repair costs out of their own budgets.

The FITG Good Practice Guide recommends cooperation between all parties involved. This is now happening with better consultation before any works commence. However, some of the solutions proposed (e.g. small loads, double handling to reduce weights) increase the costs to the forest owner and often do not form an adequate solution – e.g. double handling that reduces the individual loads but doubles the number of traffic movements on the road concerned and increasing carbon emissions.

If a change of approach is not implemented the road network will suffer with increased costs to the roads authority and private timber supply continuing to fall below expected volumes.

A road network capable of managing timber transport matched with other technical solutions is the preferred solution. How this is achieved can happen via a number of possible solutions.

Initiatives Underway

The forestry sector and stakeholders have already taken the following steps in an effort to manage the subject matter:

- Managing Timber Transport - Good Practice Guide (2014)
- Round Timber Transport – Guidelines for Hauliers and Drivers (2017)
- Introduction of Central Tyre Inflation scheme
- Study into Agreed Transport Routes
- Harvesting and Transport Case Studies
- Stakeholder Engagement
 - North West Foresters & Local Authority Timber Transport Consultation
 - National Forestry Conference – Managing Timber Transport
- International Engagement including with the UK Timber Transport Forum

While the above initiatives have improved communication and mutual understanding between the various stakeholder groups, it is recognised by all that for the national timber crop to be fully mobilised there is a need for targeted investment into the road network. Just as modern infrastructure is required for more traditional agricultural activities so it is needed now for the forestry sector to reach its potential.

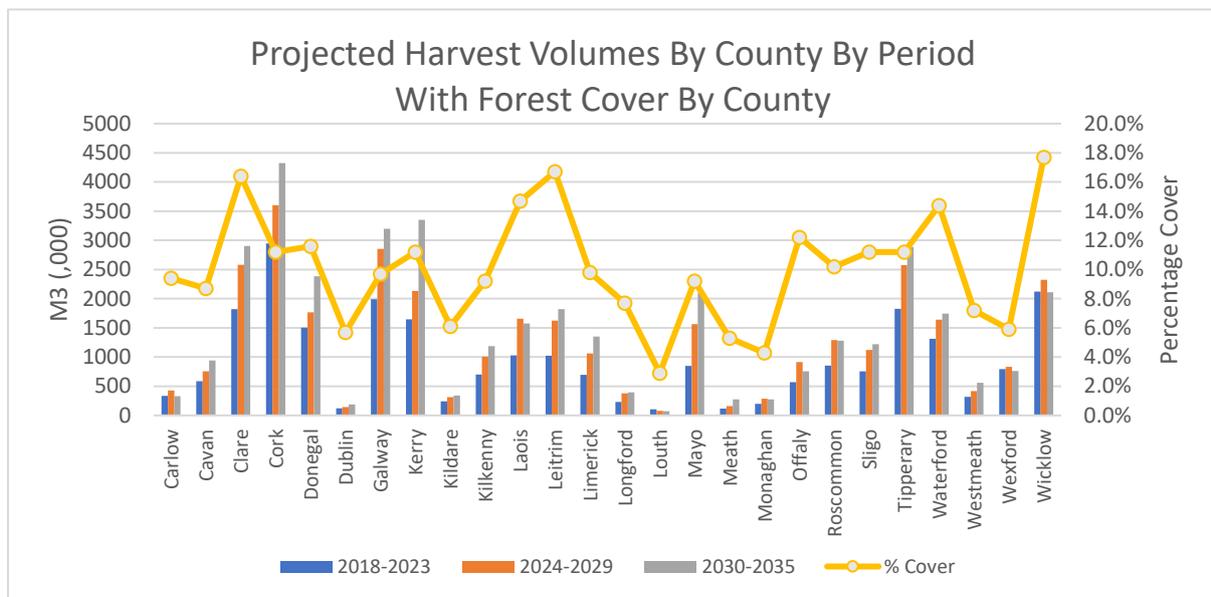


Figure 2 - Data Source: COFORD All Ireland Roundwood Production Forecast 2016 - 2035; H Phillips et al

Funding

Figure 4 above shows the timber volumes projected to be produced by county summarised into in 6 year time periods through to 2035. Overlaid over this is the percentage forest cover by county. This graph aids in identifying which counties have a high and consistent level of harvest (e.g. Wicklow) as opposed to counties that have a dramatic increase in timber volumes that will be produced in the coming decades (e.g. Cork, Kerry and Leitrim). In turn this information can be used to aid in targeting funds to regions most in need of improvement to the local road network to support an enlarged timber market.

The capacity of the built road network to support timber haulage in any given county will depend on past investment, quality of the materials used and the local geology in the area. For example, Leitrim is generally recognised as a county with a particular need for investment into its tertiary road network. This is a result of the geology and history of the roads concerned combined with the increased demands that a maturing forest estate is placing on the roads. Using the PSCI data, road engineers can ensure that funding is appropriately targeted at those roads in need of upgrade.

Table 1 below cross references the road network by county and estimates the length of this network that is impacted by forestry. Using the established 5% rule for annual road maintenance, the table establishes that there are 402kms of roads connected to forests that are in need of maintenance on an annual basis. This equates to an annual budget of approximately €20 million.

This will make a meaningful difference to the local road authorities' ability to keep timber moving in an efficient manner. It is to be noted that this investment would have an expansionary effect and would be easily exceeded by the increased tax and duty revenues emanating from the enlarged haulage fleet alone without any new costs being introduced on business. Once the other increased employment and economic activity potential is realised at the harvesting and processing ends of the value chain, the return to the exchequer from this €20 million investment would be positive.

County	Ha Forestry	% County	Kms Local Roads	Kms Local Roads with Forestry	5% Roads Strengthened per year	Cost €
Carlow	8,403	9.4	1,008	95	5	236,880
Cavan	16,830	8.7	2,481	216	11	539,618
Clare	52,290	16.4	3,439	564	28	1,409,990
Cork	83,619	11.2	10,465	1172	59	2,930,200
Donegal	56,345	11.6	5,325	618	31	1,544,250
Dublin	5,232	5.7	2,329	133	7	331,883
Galway	59,409	9.7	5,443	528	26	1,319,928
Kerry	53,175	11.2	3,802	426	21	1,064,560
Kildare	10,396	6.1	1,889	115	6	288,073
Kilkenny	19,015	9.2	2,584	238	12	594,320
Laois	25,259	14.7	1,721	253	13	632,468
Leitrim	26,502	16.7	1,769	295	15	738,558
Limerick	26,337	9.8	2,947	289	14	722,015
Longford	8,364	7.7	1,367	105	5	263,148
Louth	2,428	2.9	1,389	40	2	100,703
Mayo	51,726	9.2	5,459	502	25	1,255,570
Meath	12,496	5.3	2,578	137	7	341,585
Monaghan	5,598	4.3	2,122	91	5	228,115
Offaly	24,511	12.2	1,666	203	10	508,130
Roscommon	25,884	10.2	3,357	342	17	856,035
Sligo	20,584	11.2	2,286	256	13	640,080
Tipperary	47,849	11.2	4,482	502	25	1,254,960
Waterford	26,546	14.4	2,234	322	16	804,240
Westmeath	13,168	7.2	1,829	132	7	329,220
Wexford	13,829	5.9	2,851	168	8	420,523
Wicklow	35,859	17.7	1,671	296	15	739,418
Total					402kms	€20,094,465

Transport Scheme

In the UK they operate the Strategic Timber Transport Scheme (STTS), which finances projects that minimise impact on fragile roads, and deliver community and environmental benefits. The scheme is managed centrally, and applications can be from roads authorities or forest owners wishing to carry out schemes that will benefit areas where the current road network is inadequate to manage the demand from forestry in this area.

Community Involvement Scheme (CIS)

At present the Department of Tourism Transport and Sport (DTTAS) operate a CIS scheme where road authorities can obtain 85% funding for works on public roads. The remaining 15% is provided by the residents/landowners on the road. This type of scheme has proved successful in the past. It is welcomed that the DTTAS has decided to reintroduce a ring-fenced CIS scheme for road authorities in 2018. While this scheme is for all public roads in the country a similar type of scheme for public roads leading to forests is what is proposed here. Both of the above-mentioned schemes are similar to each other. A special dedicated scheme for forestry similar to the UK STTS is the preferred solution. This will ensure that funding is targeted to the required locations. It could be operated by either the DTTAS responsible for the public road network or the organisation with forestry responsibilities e.g. DAFM. The funding to operate the scheme could look at the feasibility of a contribution from industry or road users.

Road Infrastructure Conclusion

The Irish State has, since the 1980s, financially incentivised landowners to transfer lands into forestry and has invested many billions of euro. This is a permanent land use change resulting in the landowner foregoing other incomes from the land which has enabled the expansion of the national forest estate. This strategy reduced the exposure of the State to the entire cost of buying, planting, managing and harvesting forests, which it had historically done, while at the same time promoting a new forestry culture in Irish society. This strategy has been successful with the national estate now evenly split between private and state-owned forestry.

This rapidly maturing private estate is becoming increasingly productive. It is important that these forests are managed optimally but there is increasing evidence that many forests are not being thinned as they should be, with one underlying reason being the sector's inability to move timber out of the forests and into the economy. This is due to weak road networks that have not had the investment into them to match the increase in local forest cover.

As the average forest size is small, there are no opportunities for either the forest owners or the contractors concerned to achieve large efficiencies of scale. This results in the sector being highly cost sensitive so the imposition of bonds, as frequently occurs, has had a disproportionate negative effect that has both hindered timber supply and undermined forest owners' confidence at a critical time.

As forests form a critical element of Ireland's GHG mitigation strategy to meet our emissions reduction targets, it is important that they are managed properly. It is only when they are rotated and managed appropriately that their maximum capacity to absorb carbon is achieved.

The Local Authorities with the weakest infrastructure have indicated that relatively modest sums of targeted and ringfenced investment into the tertiary road network will result in big gains to the forestry sector's ability to mobilise timber. This investment can then be complimented with internationally recognised innovative approaches which can include Central Tyre Inflation on transport vehicles and an agreed routes network to close the transport gap.

The positive contribution of timber trucks fitted with CTI to reduce wear and tear on weaker roads is already recognised by the recent introduction by the Forest Service of a Variable Tyre Pressure Grant Scheme to support the fitting of CTI to a proportion of the haulage fleet.

Finally, any targeted investment into the tertiary road network will be recovered through the existing taxes and duties emanating out of the haulage fleet alone. When matched with the increased employment and economic activity occurring elsewhere in the value chain, it is clear that an investment into the local road network to enable the mobilisation of timber would be positive for the exchequer and for rural Ireland as a whole.

Road Infrastructure Recommendations

The following recommendations are put forward by the FITG:

- A. **Recommendation:** Targeted funding of €20 million per annum should be made available to Local Authorities to enable them to upgrade their local road network where the road network is being utilised for timber haulage
 - a. **Purpose:** To remove financial constraints to the proper development of the forestry sector and promote growth in the rural economy. This will contribute to more efficient transport, lowering emissions while protecting existing infrastructure and enhancing rural connectivity and prosperity
- B. **Recommendation:** Compile a list of roads by Local Authority, adjoining forestry, including a Road Classification of these roads so as to aid in the identification of those local roads most in need of improvement works
 - a. **Purpose:** Accurate targeting of financial resources so as to maximise the economic benefit of the funding provided. This will contribute to more efficient transport, lowering emissions while protecting existing infrastructure and enhancing rural connectivity and prosperity
- C. **Recommendation:** Continued development of an Agreed Routes network
 - a. **Purpose:** To minimise the number of road improvements required by concentrating as much haulage as possible along identified road infrastructure. This will contribute to more efficient transport, lowering emissions while protecting existing infrastructure
- D. **Recommendation:** Continued promotion of CTI and other technological solutions that reduces the impact of heavy vehicles on local infrastructure
 - a. **Purpose:** To mitigate the financial requirements in upgrading the road network. This will contribute to more efficient transport, lowering emissions while protecting existing infrastructure

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?

Consideration must be afforded to the following:

- Delivery of a more effective and efficient transport infrastructure.
- Supporting efficient logistics through the planning system - Freight movements are actively discouraged by the planning system in many built up areas
- As part of an integrated transport system, defining and supporting the use of Ultra Low Emission HGVs and give increased access to Low Emission commercial vehicles in urban areas.
- Incentivising integrated freight transport through grants and tax inducements.
- Ensure the power infrastructure required for zero emission vehicles is delivered.
- Carefully considering proposals for HGV restrictions due to the negative impacts of down-sizing.
- Ensuring the power infrastructure required for zero emission vehicles is delivered.
- Supporting vehicle manufacturers in the development and deployment of zero emission vehicles.

As part of a more integrated approach to freight transport and transport planning, logistics providers should consider the following:

- Ask operators about their fuel efficiency policies/practices.
- Facilitate off-peak deliveries wherever possible, especially in urban areas.
- Support flexible supply chains to facilitate use of alternative power sources for vehicles.

Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?

A strategic review of the rail freight infrastructure would need to be carried out to devise where best it can be developed to benefit the road freight sector. It must be taken into consideration that a rail journey of a minimum of 300k would be required to make this a feasible undertaking.

What are the barriers which prevent movement of freight by rail?

- Recent studies suggest there may be savings in moving part or full consignments by rail. Grants should be considered by Government to help offset the initial and subsequent costs of moving to non-road modes of transport.
- The advantage of transporting goods by road is that the haulier has greater control over the departure time and can calculate delivery times with a certain degree of accuracy. Timely deliveries of goods by rail will be impacted by the rail schedule, and the quality and reliability of the rail network.
- The geographical size of the country mitigates against the use of rail freight with, in general, a 300km of distance between stations considered necessary to make rail freight viable. Efforts to increase the use of rail freight should therefore be concentrated on routes that have significant freight movement requirements. A good example of this is the new twice-weekly rail freight service between Ballina (County Mayo) and the Port of Waterford, which facilitates, among other things, the transport of timber logs from the west of Ireland to the Coillte SMARTPLY.



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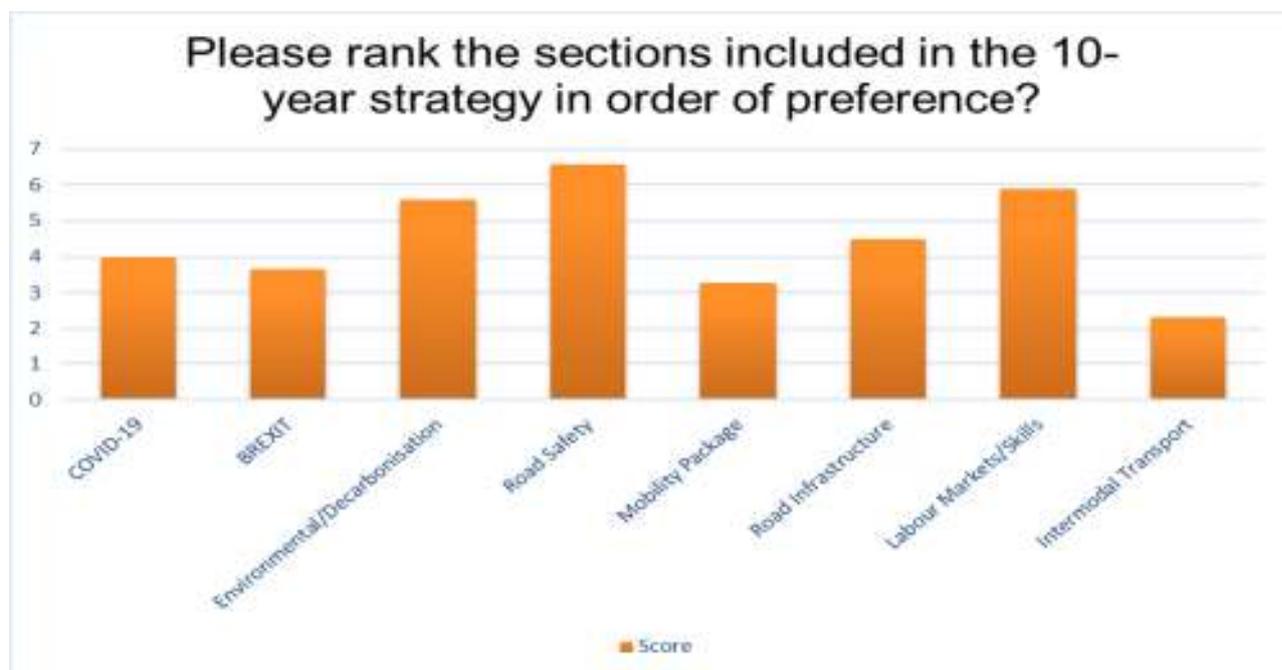
July 2021

RE: 10-YEAR HAULAGE STRATEGY

The Freight Transport Association of Ireland (FTAI) welcomes the publication of the Ten-year Strategy for the Haulage Sector First Consultation Document¹ and we appreciate the opportunity to submit our views for consideration. We offer the observations of our membership on the priorities for Government. FTAI membership covers all aspects of private and public freight transport, passenger transport and logistics supply chain, including road, rail, sea and air and represent some of the largest freight and passenger operators in Ireland, with more than 25,000 employees and 10,000 vehicles operating between them. Core to our Association is engagement with stakeholders that can work collaboratively to raise the profile of the freight distribution and logistics sector and to recognise those companies that operate to the highest levels of professionalism and compliance.

A 10-year strategy for the haulage sector is very welcome, and it is important to highlight at this juncture that FTAI consider our response relates to all those that operate fleets of heavy commercial vehicles (HCVs) over 3.5 (metric) tonnes (3.5t) gross vehicle weight, including the own account sector as well as those operators that have operator licences.

FTAI members have identified the sections contained in the 10-year strategy in the following order of priority.



¹ <https://www.gov.ie/en/consultation/0dfc7-public-consultation-on-ten-year-strategy-for-the-haulage-sector/>



- | | |
|------------------------------------|-------------------------|
| 1. Road Safety | 5. COVID-19 |
| 2. Labour Market / Skills | 6. Brexit |
| 3. Environmental / Decarbonisation | 7. Mobility Package |
| 4. Road Infrastructure | 8. Intermodal Transport |

Our submission will provide detailed answers to the questions posed in relation to the 8 defined sections, COVID-19; Brexit; Environmental/Decarbonisation; Road Safety; Mobility Package; Road Infrastructure; Labour Market/Skills; and Intermodal Transport. The submission also outlines a synopsis of other topics/points that are not directly referenced in the consultation document but which the FTAI feels are important to consider.

Additional Points for Consideration

Minister of State at the Department of Transport with special responsibility for International and Road Transport and Logistics²

With climate change, the COVID-19 pandemic and the UK's departure from the EU, there has never before been such pressure placed upon supply chains and logistics in Ireland. The industry needs dedicated and expert leadership to face these unprecedented challenges. The appointment, in June 2020, of a dedicated Minister of State with special responsibility for transport and logistics was very welcome but this position must be elevated to a full Cabinet position. As an island nation on the periphery of Europe, if we are to develop our global brand and become world leaders in logistics, more emphasis and supports must be forthcoming from our Government. The Covid Pandemic and Brexit have served to create sustained awareness of the intricacies and complexity of the supply chain. The freight distribution and logistics sector is worth €6.5 Billion of Gross Value Added (GVA)³. According to the recently published report Logistics and Supply Chain Skills Group⁴ Annual Progress Report (December 2020), 103,000 people are employed in selected transport and logistics roles (33% are drivers and transport operatives). Having a Minister with responsibility for the freight distribution and logistics sector will ensure that Ireland is supporting job creation for the industry as well as affording the requisite recognition that Ireland's freight distribution and logistics sector is critical to our continued economic sustainability and success.

10-Year Strategy

It is welcomed that the proposed strategy will provide the haulage sector with a long-term perspective. Business cycles are generally understood to play out over a 7 – 11-year period. Because of the pace of change within the freight distribution and logistics sector, Brexit, COVID-19, EU Green Deal, technological advancements, etc. the approach to this strategy must be dynamic and facilitate periodic reviews and updates.

- FTAI expect the strategy will be published by Government or the Department of Transport. The strategy should clearly set out the key actions underpinning it, the desired outcome and how success will be measured, as well as the Lead Agency / Department, the person with responsibility within that Agency / Department, the target completion date and any supporting Department / Agency.

² <https://www.gov.ie/en/organisation-information/9b5048-government-ministers/>

³ Source: National Income and Expenditure 2019, CSO

⁴ www.gov.ie - Logistics and Supply Chain Skills Group (www.gov.ie)



The monitoring arrangement must be made clear e.g., in the case of the Road Safety Strategy, the Road Safety Authority (RSA) is responsible for ensuring the Road Safety Strategy is flexible and responds to changing circumstances, as well as reporting progress annually to the Minister for Transport. Who will carry out the corresponding responsibilities in the case of the strategy for the haulage sector?

The Ministerial Committee on Road Safety has also played a critical role in monitoring the progress of the Road Safety Strategy and similarly there is a cabinet sub-committee on insurance reform. Because of the cross departmental functions which impact on the haulage sector FTAI believes an appropriate monitoring role involving Government Ministers should form part of the monitoring arrangements and would be hugely instrumental in steering the delivery of the strategy.

As well as an annual progress report, there should be a mid-term evaluation of the strategy to provide an opportunity to assess and recalibrate priorities and targets.

BREXIT ADJUSTMENT RESERVE

Ireland will receive more than €1 Billion⁵ from the Brexit Adjustment Reserve, the largest allocation to any Member State. Ireland, as an Island nation, is reliant on effective and efficient sea/ferry connections to continental Europe. As a consequence of Brexit, since the 1st January 2021, all in the freight distribution and logistics Industry (the haulage sector in particular) have been displaced from availing of the UK Landbridge to direct routes to and from continental Europe. The alternative direct routes are more expensive for industry and susceptible to inclement weather where ferries are frequently cancelled during the Autumn and Winter months. In addition, there is insufficient capacity on routes to strategically important destinations in Europe for Irish importers and exporters. Dunkirk / Rosslare is the only new route that is a viable and an effective alternative to the Landbridge. The Landbridge option is compromised because of requirements for transit under guarantee bonds, additional permits and uncertainty around delays at ports, and special requirements for the movement of products of animal origin, all resulting in increased costs. FTAI believes on-going supports are required post Brexit, some of which could initially be funded from the Brexit Adjustment Reserve:

1. Invest in Driver Facilities at our ports – In Dublin T11 does not have adequate facilities for drivers, particularly for the volume of drivers having to stay with the loads for long periods of time. Facilities need to be constructed to look after the welfare of drivers to include overnight accommodation; shower facilities; appropriate rest areas and provision of food services. (Drivers are currently asked to sleep in trucks that are not designed with sleeping quarters).
 - a. Facilities for hauliers at ports must improve as a matter of urgency to provide for the following:
 - i. Sufficient parking for dropping trailers and queuing for ferries.
 - ii. Improved social facilities for drivers to ensure that where long delays are encountered there is the ability to freshen up, have a substantial meal and rest area available that is comfortable.
 - iii. Traffic management by all regulatory bodies considering the obligations of hauliers to meet working time and tachograph rules.
2. The new [post Brexit] trading environment dictates that all working in the haulage sector must be upskilled. Money should be allocated to the haulage sector to subsidise active participation

⁵ <https://www.dfa.ie/news-and-media/press-releases/press-release-archive/2021/june/ministers-coveney-and-byrne-welcome-brexit-adjustment-reserve.php>



in training courses focused on Brexit related issues and relevant to their sector. These courses should be certified and include courses on topics such as; Customs; International distribution to third countries and movement of Agri-foods; Supply chain adaptation; Understanding the haulage sector etc. Given the critical nature of our new trading requirements with the UK and the implications for the Irish Economy, designation of funding will act as a vital incentive to aid the freight distribution and logistics sector to upskill as necessary in response to Brexit. It will have the added benefit of reducing the strain on the State Agencies charged with monitoring the compliant movement of goods between Ireland and the UK.

3. Trusted Trader Programmes - The trade agreement alludes to Authorised Economic Operators (AEO) status and the continued recognition for such schemes within the UK. However much more information and guidance needs to emanate from the EU and UK about the benefit of these programmes and what simplifications they deliver. Funding and support should be provided to industry to incentivise businesses to attain trusted trader status.
4. Connectivity with Continental Europe - Brexit has delivered increased supply chain complications for trade between Ireland and the UK with little or no time to prepare for the introduction of new customs systems and processes. The traditional route to continental Europe via the UK Landbridge is not as appealing resulting in increased demand for direct services between Ireland and continental Europe. The recently published (November 2020) IMDO report 'A Re-Assessment of Irelands Maritime Connectivity in the context of Brexit and COVID-19 Challenges' highlighted that there was enough capacity on direct routes (pg4) and asserted that increased demand would be met with extra services. The fact that hauliers with bookings on direct services are being bounced because of overbooking demonstrates that this theory has been challenged. FTAI recommends that the Department of Transport urgently review the situation and provide an updated assessment of connectivity for the Irish supply chain. There is over demand for direct services to continental Europe with limited capacity in an unusually quiet period, if capacity isn't increased urgently the Irish supply chain will struggle. As ferry operators cancel bookings on Ireland / UK routes a temporary solution would be to divert extra ferry capacity onto the continental routes to alleviate some of the pent-up demand.
5. Rosslare - Dunkirk route - This service is more expensive than other connections to Cherbourg and considerably more expensive than the UK Landbridge. The Brexit Adjustment Reserve should be used to subsidise the additional cost to hauliers. The Reserve is aimed to counter adverse consequences in Member States and sectors that are worst affected. All the issues Ireland faces; the additional cost both in time and administration red tape; and the increased cost to market, is providing more difficulties for the freight distribution and logistics sector. A system similar to a Public Service Obligation should be established as it would act to reduce the significantly higher costs for haulage operators to access continental Europe. The EU Commission confirmed that no one member state should be discommoded more than another. Ireland's geographic location and our reliance on the UK Landbridge results in the country being more discommoded than other member states when it comes to connectivity with continental Europe.
6. IT Systems – There is too much duplication required in providing the requisite information for the different state agencies This is a consequence of IT systems across the state sector not being able to effectively and efficiently share information. As an example, the Health Service Executive (HSE) requires the following information that is already provided to Customs:
 - a. SAD (Revenue Documentation)
 - b. Commercial Invoice
 - c. Bill of Lading
 - d. Packing List
 - e. Delivery Address
 - f. Country of Origin of the products



Each state agency is working in their own silo and not sharing information meaning that whilst Revenue will have been submitted all the Customs information this all has to be duplicated for the HSE (for products of non-animal origin) and the Department of Agriculture, Food and the Marine (DAFM) (for products of animal origin)

Funding should be provided to simplify the IT systems and ensure that there are connectivity controls that facilitate transfer/importation of duplicate information. None of these requirements (including Safety and Security) were developed with the levels of volumes between the EU and UK trade in mind. APIs need to be developed to ensure interconnectivity of State IT systems. The UK / HMRC and Irish systems should also be interoperable. The net result of the current situation is that companies must have access to and pay for numerous different systems. It is also taking a serious amount of time to process all of this information and this cost is very prohibitive, particularly for small to medium sized businesses.

CODE OF PRACTICE

FTAI recommend that consideration be given to develop a code of practice for the Haulage Sector similar to the code of practice developed by the HSA for the Agriculture Sector⁶. The code of practice would provide clear guidance to the sector on their health and safety obligations as well as containing key guidance on compliance consideration for drivers specific to their roles as a professional driver including information on safe and secure loading; tachograph and working time requirements; reversing; coupling and uncoupling trailers.

The 2005 Safety Health and Welfare at Work Act allows employers with three or less employees to comply with the terms of a Code of Practice as an alternative to preparing a written Safety Statement⁷. Of the 3,802 Operators licenced with the Department of Transport, 2,495 (66%) have three or less HGVs. Whilst the number of HGVs in a fleet does not necessarily determine the number of staff in full time employment, the predominance of this size operation within the haulage sector justifies the requirement for a code of practice written specifically for the sector. Creating a document that contains user-friendly guidance in respect to haulage operations, employers and employees, contractors and persons with a role related to health and safety will provide a simple approach through the risk assessment document to managing safety. This will have the benefit of ensuring as many small businesses as possible will understand their minimum legal obligations as employers that will have the net result of improving the safety of the businesses, improved road safety and more of a level playing pitch of compliance for this cohort of the haulage sector.

HEALTHY EATING CAMPAIGNS

The Driving for work [www.drivingforwork.ie] initiative, a joint venture with the RSA, HSA and An Garda Síochána, has published guidelines on 'Driving for Work – Healthy Driving Guidelines'⁸. This publication introduces awareness around fatigue, medical fitness to drive, implications of stress on driving and other issues including information on diabetes. This programme should be expanded to include all stakeholders and industry representatives in a campaign to highlight the importance of healthy eating and taking appropriate rest breaks for the haulage sector. Transport Infrastructure Ireland (TII) is charged with ensuring there are appropriate facilities on our motorway network (in response to guidelines from the EU commission). There is also an opportunity to work with TII to develop a robust campaign that promotes the following:

⁶

https://www.hsa.ie/eng/Publications_and_Forms/Publications/Agriculture_and_Forestry/Farm_Safety_Code_of_Practice_Risk_Assessment_Document.pdf

⁷ https://www.hsa.ie/eng/Your_Industry/Agriculture_Forestry/Overview/Agriculture_Code_of_Practice/

⁸ http://drivingforwork.ie/wp-content/uploads/2017/10/Driving_for_Work-Driver_Health_Guidelines.pdf



- Facilities on Motorway networks
- Fatigue awareness and triggers to be aware of
- Healthy eating options for drivers
- Eating areas for those that bring their own packed lunch.

It is so important that service rest area services predominantly promote healthy choice for those who drive for work.

OPERATOR LICENCING

FTAI has long championed the introduction of an operator licence for the own account sector that would standardise minimum requirements for the running of commercial fleets. The Road Safety Strategy 2013-2020 (Action No. 88) placed responsibility on the Department of Transport (then the Department of Transport, Tourism and Sport) to review the policy on licensing of road transport operators to assess if own account operators should be added. FTAI supported this Action, and, in order to inform discussions, submissions, recommendations and decision making relating to the licensing of road transport operators, calls on the Department to publish this review and the conclusions.

88.	Review policy on licensing of road transport operators to assess if own account operators should be included.	DTTAS	Secretary General	Q3 2014	RSA
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A review of the current resources allocated to the enforcement of the operator licence regime, to include the body responsible for this enforcement, should be carried out as a matter of urgency. Consideration should be given to the establishment of an agency (or a body within the existing structures) with responsibility for the licensing and regulation of those who operate heavy goods vehicles (HGVs), buses and coaches.

We recommend that a Traffic Commissioner regime be introduced similar to that in the UK. This body would serve the purpose of ensuring only competent and reputable people operate within the haulage sector. Fair and effective enforcement is critical for fair competition in the marketplace, taken action on those operators that flaunt the rules/law and supporting those companies that operate in a professional and compliant manner.

This body could also be resourced to carry out periodic compliance audits to ensure that operators are meeting all their requirements as detailed in the operator licence application in respect to place of business, parking facilities for HGVs, financial standing and good repute.

The impact of under resourced enforcement is that there is an element of unfairness for operators that invest in compliance. Those that flaunt the rules run high risk operations that create a distorted marketplace which does not support the welfare of drivers or the reputation of the industry. Whilst a minority of operators operate in this way, fair enforcement is essential in supporting the reputation of the industry and will also result in attracting new entrants to the industry.

Abnormal load permitting - Centralisation of the permit system would reduce the administrative workload for the haulage sector and could also lead to greater consistency in applying restrictions around the likes of hours of movement and requirements for escorts.



ENFORCEMENT

The current number of members of An Garda Síochána attached to Road Policing Units is just over 700 strong. This number is not sufficient to facilitate fair and consistent quality enforcement. During the years of austerity, the numbers allocated to Roads Policing reduced considerably and the absence of specialist training has resulted in a skills shortage when it comes to Garda enforcement of the haulage sector. The upskilling of Garda personnel in commercial transport legislation and regulation is essential in improving and preserving compliance and safety on our roads. Fair and consistent enforcement is critical to the sustainable implementation of compliant operations and drives a culture within the freight distribution and logistics sector that recognises the legislation and the regulations underpinning a fair, competitive safer environment for all. There is also a significant role to be played by all agencies charged with enforcing the laws of the land, including the RSA and the Health and Safety Authority (HSA), with a requirement for the allocation of sufficient resources as well as ongoing collaboration.

GRADUATED FIXED PENALTIES

FTAI recommend that Graduated Fixed Penalties are considered as an effective and efficient means of enforcement for driver's hours offences, minor roadworthiness and other issues such as overweight and over height vehicles. Fixed penalties provide an efficient, proportionate, and direct way of dealing with a wide range of road traffic offences. The rights of individuals to challenge alleged offences in court are preserved, but the number of cases brought before the courts should be substantially reduced. Graduated Fixed Penalties have worked well in the UK for years and the VOSA guide⁹ provides good detail on how their scheme works. The result of the introduction of this scheme would be to develop a consistent level of compliance for all operators of commercial vehicles and international visitors to these shores. In addition, a key benefit would be to reduce the strain on the court system and the time taken by RSA and Garda personnel preparing for and attending court.

DRIVER SHORTAGE

The shortage of HCV drivers in Ireland, and indeed across Europe, has been well documented. The consequences of Brexit and COVID-19 have had a further detrimental impact in terms of the FTAI's membership and particularly HGV fleet operators who cannot recruit enough qualified drivers to meet their demands. One option for sourcing drivers is South Africa where, as in Ireland, they drive on the left-hand side of the road and the population is English speaking. At present four countries outside of the EU/EEA are covered by mutual recognition agreements for CE/C1E driving licences – South Africa, Australia, Japan and South Korea.

- The list of countries covered by mutual recognition agreements for CE/C1E driving licences should be extended to include countries where there is clear evidence that Ireland has appealed to their residents as a working destination for other trades e.g., Brazil, the Philippines and India.
- The Irish State should do more to entice such HCV drivers in the UK to move to Ireland for work rather than return to their home nations.
- There are too few young people embarking on a career in HCV driving. The industry needs to become attractive from a remuneration and professionalism perspective. Government and industry need to work collaboratively to help rebrand the industry and promote HCV driving

⁹ https://www.freight-train.co.uk/downloads/VOSA_GFPN_guidance.pdf

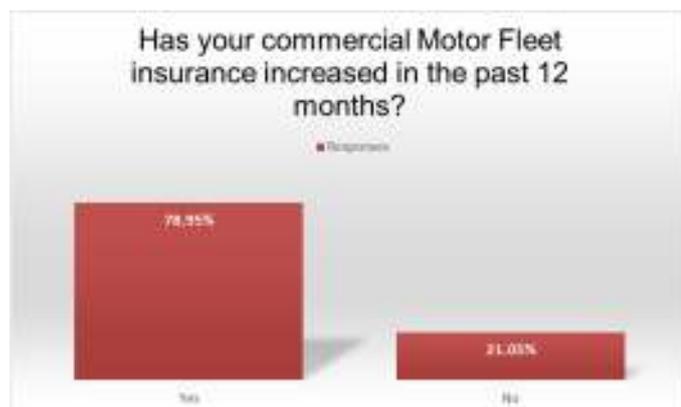


as an attractive and viable career choice. FTAI is already actively engaged in raising awareness of the issues and working with Higher Education Authorities as well as SOLAS to help make this happen.

INSURANCE

FTAI recognises the steps being taken by Government in relation to insurance reform, however, we contend that the commercial fleet sector requires speedier intervention by Government to ensure that more competitive and realistic insurance premiums are available to fleet operators. The increased cost of insurance is having a serious impact on day-to-day operations with little engagement from the insurance sector in proposing solutions to operators in order to garner more competitive rates. The Cabinet committee sub-group on insurance reform, chaired by the Tánaiste and Minister for Enterprise, Trade and Employment, must focus on the commercial motor sector to develop key solutions for this type of insurance. Adoption by businesses of risk management practices must be encouraged, recognised and result in substantial premium savings for operators who conduct their business to the highest standards. On the other hand, those operators who have claims and who do not implement such high standards in risk management and rectification practices should expect to see this reflected in their premiums.

As an Association that has long promoted the highest standards of professionalism and compliance, the lack of prolonged and consistent engagement by the insurance sector in supporting compliant operators is very frustrating. The ‘one brush’ fits all approach to insurance premium assessment is wrong and looks to recoup the losses of the badly performing risks from the majority that work in a risk conscientious manner. Just under 79% of FTAI members have seen their fleet insurance policies increase in the past 12 months. 60% have seen an increase of between 2.5% and 5%. 13% have seen increases of over 5% in the past 12 months.



A key task for the haulage sector, indeed all operators of commercial vehicles is to attract young people into the profession of professional driving. To support this insurance companies must be more open to including fully licenced young drivers on policies at reasonable insurance premium rates. The cost of motor insurance for young drivers on fleet policies is prohibitive and is entirely unjustified. The training and licensing requirements for a professional driver as such that the insurance sector must reconfigure their risk analysis of this cohort to support industry.

DATA COLLECTION

There are many agencies involved in the collection of data and information pertaining to the freight distribution and logistics sector, including the Central Statistics Office (CSO) who carry out periodic commercial transport surveys. However, in the first instance there is a lack of clarity on what constitutes a HGV, and, as a consequence, the actual number of HGVs in operation in the State. This creates confusion and makes it particularly hard for cross referencing. This was identified as an issue



as far back as 2010 in a report published by the 'All Island Freight Forum'¹⁰. We recommend the following should be considered.

- Agree referencing criteria for HGVs based on Gross Vehicle Weight with a HGV being any vehicle with a GVW of over 3,500kg (or 4,450kg for electric vans). (This is already the definition used when requiring drivers to do Driver CPC training and also for vehicles requiring tachographs. It is also used when defining vehicle categories.)

Commercial Vehicles

N1	Vehicles designed and constructed for the carriage of goods and having a maximum mass not exceeding 3,500 kg e.g. light vans and trucks. CVRT tested annually.
N2	Vehicles designed and constructed for the carriage of goods and having a maximum mass 3,500 kg and not exceeding 12,000 kg e.g. larger vans and trucks. CVRT tested annually.
N3	Vehicles designed and constructed for the carriage of goods and having a maximum mass exceeding 12,000 kg e.g. trucks. CVRT tested annually.

COMMERCIAL VEHICLE OPERATOR RISK INDEX (CVORI)

The Commercial Vehicle Operator Risk Index (CVORI) was introduced by the RSA with the aim of improving the safety of HCVs on our roads, making journeys safer for all¹¹. The basis of the operator risk rating is determined from a number of areas pertaining to roadworthiness and drivers' hours compliance assessed through on-road inspections, on-site inspections and commercial vehicle roadworthiness test results. The risk rating is based on a traffic light system - Red, Amber and Green, with Red being the worst rating. According to the RSA website, operators having a red rating can expect to have a higher number of inspections by the RSA than those having a lower or green rating.

A lot of effort, by both the RSA and the haulage sector, has gone into communications and education around CVORI. Nonetheless, there appears to be a perception within the industry that CVORI has not resulted in those operators who flout the laws being the subject of any greater level of enforcement than those who put the time, effort and investment into compliance. Whether justifiable or not, the existence of such a perception is not helpful in promoting and achieving compliance and the RSA should therefore work closely with the road transport sector to ensure, firstly, CVORI is working as intended, and secondly, the industry is generally accepting that this is the case.

COVID-19

COVID-19 has had a devastating impact on some segments of the freight distribution and logistics sector such as food services (companies that supply goods and services to restaurants and pubs); construction sector (those that manufacture and supply essential construction materials, quarries, steel, timber, windows, insulation etc); private coach and bus sector; International haulage (demand for goods decreased substantially during the restrictions between March and July 2020 in particular, with most operators struggling to make profitable inward (to Ireland) and outward (to the UK and EU)) journeys. This cohort has limited cash reserves and the lack of backloads puts a strain on their sustainability. Other challenges

¹⁰ <https://www.cso.ie/en/media/csoie/releasespublications/documents/transport/2010/AIFF2010.pdf>

¹¹ <https://www.cvrt.ie/en/Operator-Driver-Obligations/Pages/Risk-rating.aspx>



included significant reduction in demand for cash in transit operations; clothing and electrical retailers with suppliers are also suffering.

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 Irelands supply chains?

The pandemic has highlighted the resilience of the supply chain to ensure essential products are available and the supermarket shelves are stocked, and critical medical devices and medicines get to those that need them most. However, the pandemic has highlighted an inequality between how the industry is perceived versus other essential services and this must be evaluated. Developing a broader understanding of the intricacies and complexities of the supply chain is important in supporting the industry in times of crisis. The bottom line is, if the supply chain is disrupted the State is at risk due to the unavailability of essential items such as food, water, medical supplies and so on. Developing a strategy that recognises the strategic importance of logistics and preserves the supply chain at all times is the most important lesson from this most recent crisis.

1. There must be more supports for essential workers and recognition for the important role of all within the supply chain including the haulage sector and their drivers. Without haulage there would be no movement of goods and it is incredible that this sector has been able to work so effectively in this time of crisis. The fact that drivers are lone workers is important but the fact that safety controls were put in place to ensure distribution centres were not impacted to support the movement of goods should be lauded. The vaccination programme and the criteria for roll out must be reviewed in future as our international drivers are as important as other essential workers and should be protected to the same degree. As mentioned already, without them the essential medicines, food and clothing would not have reached our markets. All drivers have families who have been very worried (particularly in 2020) about the safety of their family members as they travel around the country and abroad.
2. Better communication from agencies with responsibility and links to the supply chain is critical. Industry requires clear guidance and information, and, while appreciating that COVID-19 was something the likes of which we had not experienced before, this was slow to emanate from key stakeholders such as the RSA, HSA and the Department of Transport. Industry specific guidance is required. In the early stages of the crisis the following issues were common:
 - HSA: The Authority did not demonstrate a clear understanding of their role in managing the pandemic particularly in relation to the freight distribution and logistics sector. There was a distinct lack of guidance on generic COVID-19 risk management requirements provided by the Authority.
 - RSA: Conscious of how quickly COVID-19 was thrust upon us, nonetheless, changes to inspection regimes, commercial vehicle roadworthiness testing, tachograph management were slow to be implemented. The requirement for Ministerial approval for implementation of changes necessary to protect both the commercial fleet sector and the staff of the RSA created a delay which resulted in uncertainty and confusion within the industry.
3. The supply chain is complex and both resilient and fragile at the same time. We see examples of the fragility with the 'EverGiven' container carrying vessel blocking the Suez Canal and the long-term consequences of our reliance on super cargo ships, and evidence of the resilience in the fact that our supermarket shelves have been stocked and essential Personal Protective Equipment (PPE) and medical equipment and medicines (including Vaccines) have moved without disruption.



Where the State and businesses source their products has come to be examined. The pandemic commencing in different regions at different times has meant severe complications for the manufacturing and production processes. The complexity of the supply chain means that more education and training must be provided to ensure a better understanding for all stakeholders. Having a plan 'B' is essential in preserving the supply chain integrity. Whilst the world has been made smaller due to air travel and sea and rail connectivity, the fact is that if you source products closer to home the less complications in the event of a crisis. In any event it is critical that movements for essential supply chain continue in a safe and secure way and that the freight distribution and logistics sector continue operating in times of crisis. Open channels of communication with government in this instance are critical.

The pandemic has shown that the logistic sector is the life blood of the economy, keeping things moving. To support the critical services the industry provides, support is required including storage space and reliable infrastructure.

Lead times, alternative supplies etc are arguably all commercial matters.

The Just in Time logistics model has been challenged. We need to consider:

- Storage space
 - Lead in times
 - Location of supply
 - Alternatives supply options
4. The pan European guidance model worked with varying degrees of success! It was obvious in the early days of the importance of keeping road freight moving throughout Europe. The issues arose as individual Member States implemented differing border controls and checks. The establishment of the Green Lane guidance by the EU Commission was welcome as it provided clarity and stability of approach to keeping borders open for essential traffic, or so we thought. Member States adhered to the guidance in a variety of ways with France ignoring it completely with the introduction of mandatory antigen testing requirements for essential workers.

National and EU wide emergency response committees to include stakeholders from the freight distribution and logistics sector must be established to develop a coherent emergency response plan that can be implemented effectively in times of crisis that would include, pandemics, threats to ports/airports (points of entry); bad weather events.

National and EU wide emergency response committees to include stakeholders from the freight distribution and logistics sector must be established to develop a coherent emergency response plan that can be implemented effectively in times of crisis.

Are there any suggestions for policy support to address the challenges that have been experienced as a result of the covid19 pandemic?

1. The Office of Emergency Planning supports the Minister for Defence who chairs the Government Task Force (GTF)¹² on Emergency Planning. Creating a sub-group with representation from the freight distribution and logistics sector is essential in ensuring comprehensive preparations for, and response to, all emergencies.

¹² <https://www.gov.ie/en/publication/7ff6f-strategic-emergency-management-sem-national-structures-and-framework/>

Emergency Planning: Creating a sub-group with representation from the freight distribution and logistics sector is essential in ensuring comprehensive preparations for, and response to, all emergencies.

This sub-group should include the Department of Transport, and key stakeholders within the logistics sector. The sub-group should commence work immediately and form part of the national emergency planning in the event of future pandemics as well as for example -

- Very bad weather and accessibility issues
 - Strategic ports becoming inoperable and continuing to meet the need to maintain connectivity.
 - Disaster planning – fuel shortage / explosions / natural disasters.
2. The HSA / RSA should be more pro-active in engaging with key stakeholders to ensure consistency of messaging. Both agencies have responsibility for work related vehicle safety and driving for work compliance. All emergencies have consequences for the welfare of employees and businesses and, as is the case with the COVID-19 pandemic, have consequences for the availability of services under their remit such as Commercial Vehicle Test Centres; Driving Test; Tachograph Calibration; welfare of workers and safety issues relating to carrying out normal duties for all within the supply chain. Guidance on the use and requirement for PPE is a core part of the HSA's remit, however their lack of guidance and information on this issue in 2020 created confusion and a lack of certainty within the freight distribution and logistics sector. The industry demonstrated resilience and a commitment to protect the safety of their employees and customers through a safe cleaning of equipment regime; use of face coverings; social distancing and the implementation of innovative safe operating practices.
3. More flexibility to alleviating the expense associated with operating a commercial fleet should be forthcoming from authorities in the event of any future pandemic or similar type crisis. Particular consideration should be given to operators who, as consequence of the crisis, have to temporarily park up their fleets, partly or wholly, because services they provide are not needed e.g., those servicing the entertainment sector; hospitality, pub and restaurants. Specific considerations should include –
- In order to help maintain cash flow, provide a mechanism to refund motor tax for vehicles that are declared off the road for any full months of remaining tax covered by the period of the off-road declaration:
 - During the current pandemic significant numbers of commercial vehicles have been taken off road. In the UK they have a system called 'Statutory off the Road Notice' (SORN) that facilitates a rebate of road tax for the period it is off road. In Ireland we have a system of declaring the vehicle off the road, however there is no refund mechanism. In response to this crisis, it would be a welcome relief for commercial vehicle operators that have seen a significant downturn in their business to receive a rebate for declared off the road vehicles. This would be an essential aid to helping companies with cashflow difficulties and aiding their sustainability.
 - Operators will not be able to use the vehicle on a public road until the vehicles are taxed again.
 - Waive toll collection for essential commercial fleets.
 - Commercial Vehicle Roadworthiness Test (CVRT) Regulations provide that where a test takes place after the due date the new certificate is only valid until the date that is 12 months from the due date of the test. For example, if the CVRT certificate expires



in April 2020 and the vehicle / trailer only undergoes a test in February 2021, irrespective of the fact that it has only been off the road for the period April 2020 to February 2021 due to a pandemic or other similar crisis, the new test certificate will expire in April 2021. Therefore, a further test will have to be undergone in April 2021 adding a further cost to the owner. ***Exceptional times call for exceptional measure, and therefore it is recommended that in times of a pandemic or other similar crisis, there should be a legal provision which allows for either the test fee to be waived, or the new certificate to be valid for a period of 12 months (in the example outlined from February 2021 to February 2022).***

- Attainment of driver licences, driver CPC and other certification necessary to carry out the duties of a professional driver and or haulage business must be continued without interruption.
- State agencies charged with issuing motor tax or new vehicle registration / changed of ownership / operator licencing etc. must continue to be resourced and operate throughout the period.

BREXIT

From the point the UK voted to leave the EU in 2016, it was understood that the trading relationship between Ireland and the UK would change beyond recognition. For the first time in modern times, we would not be aligned to deliver frictionless trade. The key objective for those in the freight distribution and logistics sector was for as good a trade deal as possible to be brokered between the two blocks. Ireland was relatively exposed in the event of no deal due to our status as an island and because of our geographic location and reliance on the UK Landbridge for efficient connectivity to continental Europe. FTAI was pro-active in supporting our members with training and highlighting the potential complications for movement of goods once the UK formally left the EU customs union and single market. The lack of certainty over the years prior to the Trade and Cooperation Agreement delivered at the end of December 2020, just seven days before the official end of the so-called transition period, resulted in businesses being at varying degrees of preparation. Following the 1st of January 2021, it became very evident that UK businesses were very unprepared which had the knock-on negative impact on Irish businesses reliant on them.

Brexit has delivered the greatest shock to the supply chain in modern times and is challenging all Irish businesses reliant on imports and exports of goods to review their supply chain. Trade barriers, non-tariff barriers, rules of origin issues and barriers for the movement of products of animal origin (POAO) and live animals' administrative barriers have increased the cost of doing business between the UK and the EU. The new complexity and additional cost of using the Landbridge is proving challenging for international haulage operators.

What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?

1. On the 24th of December 2020 Ursula von der Leyen said: *"It was worth fighting for this deal because we now have a fair and balanced agreement with the UK, which will protect our European interests, ensure fair competition, and provide much needed predictability for our fishing communities. Finally, we can leave Brexit behind us and look to the future. Europe is now moving on."*¹³

¹³ https://ec.europa.eu/commission/presscorner/detail/en/ip_20_2531



- It is accepted that trade with the UK is now more complicated as a result of Brexit and that there are regulatory requirements for additional paperwork, as well as physical and documentary inspections of vehicles, all of which add additional cost and time constraints on the haulage sector. However, for a number of reasons, to date we have not left Brexit behind due to:
 - Lack of Industry Preparation
 - UK businesses were particularly unprepared for 1st January 2021.
 - Stockpiling has provided a distorted view of the impact of Brexit, as has the impact of the COVID-19 pandemic.
 - A limited number of competent qualified customs brokers and agents has resulted in a significant reduction in volumes for the haulage sector.
 - The delayed response by the EU to ratify the trade and cooperation agreement (finally endorsed at the end of April 2021) has delayed the establishment of specialised committees whose roles it is to review the implementation of the agreement and consider easements for the movement of goods.
 - The Northern Ireland Protocol and the unilateral decisions being taken by the UK to prolong easements is creating further uncertainty for businesses during 2021.
- Access to markets is important for an island nation like Ireland. Whilst a significant proportion of our haulage sector is deemed to be International, this is mainly due to the all-island nature of the haulage sector rather than the movement throughout the UK and the EU. There is a need for further integration and upgrading of systems across Government departments / agencies in order to reduce the administrative workload on the haulage sector where the current paperwork requirements result in the duplication of effort in order to provide the information required by state agencies for imports.

There is a need for further integration and upgrading of systems across Government Departments / agencies in order to reduce the administrative workload on the haulage sector

- Safety and Security Declarations: The Irish Government must represent the Irish supply chain at European level and press for the opening of negotiations with the UK to remove the requirement for entry and exit safety and security declarations. Entry and exit safety and security declarations appear unnecessary as customs declarations and movement reference numbers (MRNs) are generated and inputted into the Pre-Boarding Notification (PBN) system. If the safety and security declaration was taken out of the process it would deliver significant easements for the haulage sector.
2. Ireland needs to be connected to strategic ports in continental Europe to support our competitiveness within the customs union and single market. The new route from Rosslare to Dunkirk is a welcome start but the cost of the route is proving unattractive for businesses. Whilst increased freight volumes have moved between Ireland and France (mainly into and out of Cherbourg) our key markets are in Germany, Belgium and the Netherlands. Developing strong maritime links with ports closer to these destinations is sensible and should be supported by Government policy. The UK Landbridge, the traditional route for the vast majority of international haulage operators, has become more problematic because of the regulatory requirements imposed by the Common Transit Convention (CTC). In addition, the UK's changing immigration laws have brought an added concern about how foreign



commercial transport operators and drivers will be dealt with in the event that, despite the best efforts of the operators and drivers, illegal migrants are found in their vehicles. Everything must be done to support HCV drivers, who, in view of the importance of the supply chain, must be considered as essential workers, in carrying out their duties in an effective, efficient and safe manner

3. The Authorised Economic Operator (AEO) facility is an important measure that recognises reliable operators and encourages best practice in the international supply chain. Additional guidance needs to be developed for AEOs with particular reference to the benefits of the AEO facility and the critical role of hauliers in the AEO operation.
4. The very much welcomed the appointment of a Minister for State with responsibility for International and Road Transport and Logistics, however FTAI believes the freight distribution and supply chain must be afforded greater recognition within Government. The Brexit Preparation funnel approach by the Government, which provided limited access to the Department of Foreign Affairs and Department of Taoiseach for stakeholders representing the freight distribution and logistics sectors, was short sighted. The impact of Brexit on this sector is profound and, whilst good engagement with the Department of Transport existed, much more engagement with the sector from other Departments with responsibility to Brexit preparation would have been beneficial for all.
5. Unaccompanied trailers safety and security declarations should be the responsibility of the carrier (the shipping company). As per Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013, shipping companies on the Irish Sea have been able to transfer responsibility for safety and security declarations to the haulage sector. This is not the case for movements on the short straits. It is the responsibility of the carrier for this declaration and if the ferry operators took on this requirement it would provide significant easements for haulage operations.
6. This point is linked with good environmental practices. For efficient logistics, sufficient resources should be provided at Irish Ports for parking, road accessibility and departure and arrival times of ferries should be coordinated to minimise the impact on traffic congestion. Codes of practice should be developed to provide minimum requirements to reduce the risk of delays, reduce the risk of traffic queues and reduce the impact on the working time of drivers by making service providers have sufficient space and resources available to carry out their activities in a safe manner respecting the welfare rights of commercial professional drivers. This point is relevant for all stakeholders engaged in activities in Irish Ports including regulatory bodies such as An Garda Síochána, Revenue and the DAFM.
7. Duplication of information required for different state agencies is very burdensome and is creating confusion leading to delays at ports. Synergies between the state agencies assigned with responsibility for customs and border controls. Sanitary and Phytosanitary checks, immigration and other regulatory controls need to be developed and integrated through IT systems. Communication with haulage drivers and companies must improve. In a lot of cases, particularly for unaccompanied trailers, the hauliers are not part of the customs declaration process. The Haulier is the last to know of the reasons for the delay and this is causing frustration. Streamlined IT systems that are fit for purpose with the development APIs that offer more flexibility should be fast tracked. 24/7 technical support is also required to support traders & hauliers moving goods through the border outside of traditional office hours.
8. Citizens of Northern Ireland who live in Northern Ireland but work as the named Transport Manager for an Irish registered Haulage business are no longer eligible to carry out this duty as they do not reside in the EU. This is not the case for residents of Ireland who are free to work as transport managers in Northern Ireland. Section 3.1 of The Common Travel Area states *'The basic principle guiding the operation of the CTA is that the Irish and UK Governments treat each other's citizens in a similar manner to enable them to freely move*



between the two jurisdictions, and thereby reside and work in either jurisdiction, without the need for special permission'. Associated rights, as well as ongoing cooperation between Irish and UK authorities, facilitate and support these arrangements. The uniqueness of the land border between Ireland and Northern Ireland means that these issues are not experienced in any other EU Member State. It is reasonable that the EU Commission should consider facilitating holders of an Irish issued Transport Manager CPC qualification, working in Ireland but living in Northern Ireland, to act as the nominated Transport Manager for an Irish (EU) registered haulier.

How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?

1. The importance of a stable political environment is critical to the delivery of trade easements under the trade and cooperation agreement. In the first instance, establishment of the Partnership Council and committees is important in implementing the bi-lateral structures that can consider issues raised. A specialised committee for transport will consider over time the practicalities and realities of trading between the two blocks. Until these institutions are established little progress can be made in listening to the concerns of industry and the development of practical solutions that appeal to all parties.

2. The political will on both sides needs to be evident to assist with the delivery of more efficient trade flows between the two blocks particularly in the area of products of animal and plant origin.

ENVIRONMENTAL / DECARBONISATION

FTAI is actively involved in environmental management within the haulage sector. The FTAI’s TruckSafe™ and VanSafe™ standards focus on how commercial fleet operators are managing the safety of their drivers, the roadworthiness of their commercial fleet and their fuel consumption. The FTAI audit process examines operational compliance in the areas of road safety, haulage operations, roadworthiness, working time and environmental efficiencies. As an operational compliance audit both TruckSafe™ and VanSafe™ are encouraging members to have sustainable and pro-active fuel management policies and systems in place. This has the added benefit for members by helping them reduce their carbon emissions, reduce costs associated with fuel purchasing and aid their transition to alternative fuelling technologies whilst staying safe on the road. Members are required to submit a 3-year fuel efficiency and management plan as part of their annual audit. Data on Litres of fuel used, and Kilometres driven are collected from members of the scheme each quarter.



In line with the Paris accord to limit global warming to 2degC freight must reduce its emissions by at least 80% to 2050 whilst growing its volumes by 230% - ITF - Need to recognise that HGVs are one of the hardest transport modes to decarbonise!



The Environmental Protection Agency's report - *Ireland's Environment – An Integrated Assessment 2020* states “The stated ambition for climate neutrality by 2050 implies that Ireland will need to eliminate greenhouse gas emissions from land transport almost entirely by then”

In Ireland we have set ourselves a -50% target to 2030 whilst the population is projected to grow by 10% to 2030 and therewith freight volumes, whilst the Department of Transport maps out a 91% increase in Tonne/Km to 2050. Since 2014 FTAI has promoted, and in recent years run, a CO₂ reduction programme in the form of our EEOS funded and SEAI regulated Green Certificate programme. This recognises hauliers for their performance improvement based on primary (measured) data submitted quarterly. The results of the overall programme for the period 2014 to 2020 are summarised below.

- 89,476 tonnes of CO₂ emissions avoided.
- over €750,000 paid out to licenced operators for demonstrating reductions in fuel consumption.
- over €56m savings from avoided fuel use.

Academia can provide a valuable service to industry and the Government in independent verification of the results of the many actions that can be taken, helping policy makers to focus policy and funding as the evidence base grows, but this evidence base must result in real action on the ground and not just be models or papers. Specifically;

- Recognise fuel and energy efficiency / performance-based programmes, such as that run by FTAI, by prioritising participants for scarce renewable resources – there is no point in burning a valuable renewable fuel in an inefficient fleet.
- Relative performance improvement in L/100km is the first step to the absolute emissions reductions required; Litres and Km from primary data sources provide a solid foundation for action and reporting (vs figures derived from financials - whilst all contribute).
- Prioritise the elimination of waste in empty running, narrow delivery windows, and part loading and support planning, software and telematics use across the sector.
- Clearly define what the Government considers to be a clean vehicle now, so the industry has a benchmark against which to improve (e.g. Euro VI with AdBlue as baseline or the Clean Vehicle directive definitions – anything to clarify and bring certainty to this issue).
- Communicate the need for absolute reductions as well as relative performance improvement. Climate legislation makes it clear that absolute reductions are needed in line with science based targets, the industry has the tools the will and means to deliver but clear communication is needed from Government.

Summary of key points for consideration:

With the industry already taking a lead in emissions reduction, Euro VI is clean enough to clean city air of particulate matter, and COVID-19 showing the importance of resilient reliable freight and logistics, FTAI propose the Government's 10-year strategy consider;

- Prioritise CO₂ reduction in Department communications and policy. It is very important to be clear in communications to all concerned if net zero is to be achieved in GHG/CO₂e.
- Shifting freight from vans to cargo ebikes requires prioritisation of parking for mobile warehouses and similar hubs in urban areas. Ensuring freight stays on efficient HGVs as long as possible means building parcel hubs and loading bays along with segregated cycleways.



- Quickly provide guidance to industry in relation to insurance, tax and registration requirements for urban delivery vehicles such as electric tricycles and quadricycles used for final mile delivery.
- Improving performance is every fleet operators' day job but it would be greatly helped by clear communication of long term targets and short term tactics across Government; let us not repeat the delays of CNG in battery or hydrogen electric vehicle upgrades.
- The future is zero emission, cost parity will likely arrive sooner than we think, and the country must be ready with access to the grid and gas network/refuelling infrastructure years in advance, this requires funding, but it also requires regulatory bodies to be in alignment if they will not work in parallel.
- Ecodriving training is a proven solution, as is energy management in the form of ISO50001 or at a lower level FTAI's Green Certificate and EEOS funded programmes; funding would be nice but recognition would be a faster route to delivering measured savings.
- Task academia with reviewing results of industry programmes, not researching solutions already well proven elsewhere; enhance academic output and Government policy.
- Quick actions – no research required:
 - Barrierless tolling for HDVs is implementable now with majority of HDVs tagged and only the toll operators standing in the way.
 - Clear longer dimension rules and routing from the RSA in combination with TII can lead to optimum locations for new warehousing rather than developer led as now.
 - Dedicated parking for mobile warehouses in towns and cities; reduce batch of one losses and facilitate reverse logistics in the circular economy whilst reviving urban centres.
 - Grant HVO an excise holiday to kickstart demand in trucks from whence refinery and fuelling investments can support sustainable aviation fuels in due course.
- Additional research topics for debate
 - With limited rail lines is it better to shift passenger car traffic to rail, or road freight to rail? The answers will be route specific amidst new direct routing to Europe.
 - Where do the opportunities for cross sectoral collaboration lie? Timber and fertiliser is a well known back haulage opportunity where are the others.

What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

The commercial transport sector is a multifaceted entity that needs clearer definition for the purpose of pursuing solutions that support a sustainable transition to alternative cleaner fuels. In this context a Multifuel Safety Framework should be considered to provide guidance and information as to the viability and availability of alternative fuels. In addition, impartial analysis of available technologies should be provided to assist operators understand what alternative technologies are available and suitable for their needs.

The commercial transport sector is a multifaceted entity that needs clearer definition for the purpose of pursuing solutions that support a sustainable transition to alternative cleaner fuels.

Commercial fleet operators come in many guises operating across all industries including, haulage, manufacturing, retail, warehouse and distribution, construction, private and public passenger transport operations, security, telecommunications etc. Commercial fleets comprise of Light Goods Vehicles (LGVs), HGVs and Passenger Vehicles. The average fleet size in the haulage sector is 5.5 HGVs per fleet and the biggest commercial fleets are in local authorities or semi-state bodies. Because of the variety of type of commercial fleets, the weights carried and the size of vehicle, distances travelled,



urban versus motorway driving, national versus international driving, consideration must be given to understanding the cost associated with transitioning to newer fuelling technologies, the availability of the technologies, the lifespan of the new technologies and most importantly the infrastructure available to support the effective transition to newer fuelling technologies. It is reasonable to assume that for new technologies to be introduced they must make business sense, be sustainable (in the sense that they are not short-term solutions) and most importantly affordable. The age of a commercial vehicle in Europe could range from 5 years at the lower end with an average of 11.6 years for LGVs, HGVs 13 years and buses 11.7 years¹⁴.

Whilst FTAI recognise and support the move to new fuelling technologies that deliver improved air quality and reduced greenhouse gas emissions, it is important to note that the points outlined do not divert from our position that those that continue to operate diesel commercial vehicles must be supported to ensure they do not face an unfair competitive environment. This could occur due to the increased cost of diesel and the Government policy to increase carbon tax substantially over the coming years. Zero emission isn't possible in the short to medium term, gas can be deployed in the short to medium term and deliver savings.

Assuming less polluting means less CO₂, operational incentives are required e.g., prioritise double length trailer licences for clean and green HGVs, likewise the excess weight derogations for alternatively fuelled HGVs should be communicated to dealers and operators alike. FTAI recommend that the following is considered to incentivise the take up and usage of less polluting HGVs:

Support should be forthcoming for Biomethane production which can deliver sufficient Biogas into the grid. A working group should be established involving key industry stakeholders with representation from the DAFM and Department of Transport to drive forward opportunities to develop more interest in anaerobic digestors.

1. We have long argued for the projected carbon tax increases to be offset via the Diesel Rebate Scheme for EURO VI only, further incentivising newer vehicle uptake in the second-hand market. Any such scheme necessitates accurate and consistent recording of EURO emissions class on the National Vehicle File and will also provide a much-needed input for Government statistical reporting into the future.
2. Impose greater restrictions on imports of older EURO IV / V vehicles through taxation thus incentivising purchase or more efficient vehicles.
3. Incentivise better load management and reduce the requirement for empty running.
4. Education of haulage businesses / supply chain operations is central to success. In any transition to new technology knowledge will play a key role. To remove the fear and anxiety of transition robust education on the solutions available be it electric, gas hydrogen etc will be needed with demonstrable case studies to illustrate how beneficial the change can be.
5. To encourage investment in what are currently more expensive alternatives to diesel the refuelling infrastructure must be available to support the transition. Be it either electric, gas or other alternative fuels real focus is needed on the roll out of fuelling or charging infrastructure to support any transition. COVID-19 played a role in the current delay in roll out of the Compressed Natural Gas (CNG) stations but there are also other departmental and regulatory issues contributing to these delays. A review of the overall process involving all stakeholders with regard to commissioning CNG stations (Gas Networks Ireland (GNI), CRU, Forecourt sector) to understand the bottlenecks and streamline the process into the future is required.

¹⁴ <https://www.acea.be/statistics/article/average-vehicle-age>



6. A pragmatic approach must be taken, realistic transition deadlines must take account of lack of viable alternatives, production and availability of alternative fuelling technology, the cost of the infrastructure and the global availability of the technologies. Currently there are short supplies of batteries, IT chips and there is not enough capacity on the electrical network to support mass transition to electric vehicles.
7. We have seen a large uptake in alternatively fuelled vehicles with the introduction of both the Government and GNI grants to support transition. This needs to be maintained for the next few years to encourage a large sector take up which will support the business case for further fuelling forecourts, charging points etc. Extend the criteria for qualification for grants based on the net tonnage of CO2 savings of the new alternative fuelled vehicle.
8. Diesel is the workhorse fuel for vehicles over 3.5t. Whilst there are a number of options available to improve emissions, including Euro VI engines, there is no one easily identifiable short to medium term solution for transition. This is due to a number of factors including, use of vehicles, where there are constraints for international hauliers because of limitations on acceptability of Liquified Natural Gas (LNG)/CNG on ferries and the Channel Tunnel.
9. There is a need to develop a culture of understanding the benefits of reducing the carbon footprint. FTAI's TruckSafe™ Green Standard that requires an annual audit of Eco-driver training, improved vehicle efficiencies and integration of alternative technologies into the fleet, should be recognised as developing a culture of compliance and management of fuel.
10. The excise duty for HVO fuels should be such as to operate as an incentive to their use.

CNG fuelled vehicles save approximately 28 tonnes of CO₂eq per vehicle each year. As this fuel is available it should be actively promoted and supported publicly as a viable alternative during transition, and as a viable solution for operators as they plan for net zero emissions. For every 100 CNG HGVs, emission savings can be 2,737 tonnes CO₂eq per annum which is a substantial improvement and can deliver immediate benefits. However, if CNG HGVs are refuelled with Biomethane, it would see a reduction of 152 tonnes of CO₂eq each year. For every 100 CNG HGVs fuelled with Biomethane savings will be 15,111 tonnes of CO₂eq per annum.

FTAI recommends:

1. An additional discount on GNI connection fees should be provided for CNG Station developments.
2. The GNI monthly gas invoice incorporates transportation fees of circa 16%. This fee should be cut by 50%. A fee reduction of this scale or more would facilitate station development. Infrastructure (private and public) is urgently required for CNG. GNI has taken the lead however their price point and timelines are not effective, with only one station opened in Ireland during 2020 and none to date this year.
3. Biogas incentives should look to aligning the price of Green Gas to be no higher than diesel.
4. Biogas should have the same status as electricity as an alternative clean fuel that delivers zero emissions.
5. CNG Stations should be considered critical infrastructure and all planning applications sent directly to An Bord Pleanála.

Grid connections

Members have watched with frustration the delays in CNG station opening due to regulatory delay as each regulator works in sequence to the last.

FTAI is already hearing from SME members of issues for van depots accessing grid connections. It seems very unfair that datacentres with much fewer employees seem to enjoy priority access whilst



SMEs do not. Whilst these issues are always complicated and very much site specific, we do think that a transparent and open methodology is needed to prioritise decarbonisation of existing transport services over new demand for connections to both the gas and electricity grids.

Given the Minister of transport also has responsibility for the Department of the Environment, Climate and Communication and the Department of Transport, the Minister is in a strong position to ensure that decarbonisation can be counted in prioritising transport sites for grid upgrades or connections. For example, a single Heavy-Duty Vehicle (HDV) can consume 35-50,000L per annum each or for 10 a total of 3.5-5GWh of energy, emitting 110-159tonnes CO₂e (at 3.17kg CO₂e/L WTW); switching 1 HDV to battery electric at 296gCO₂e/kWh (SEAI 2020 Energy Balance) would save 60% in final energy increasing cost competitiveness and reducing emissions by 69-98t CO₂e per annum with at least a 10-year life to the connection and possibly 20 years plus.

Prioritise HDVs for Grid access	Factor	Aug	FTA Members	
HDV		35,000	50,000	Litres
kWh	10.17	355,915	508,450	kWh
CO ₂ e WTW (GLEC)	3.17	110,950	158,500	kg CO ₂ e
		111	159	tonne CO ₂ e
60% saving based on experience to date with Vans and 69% saving in DTTAS Bus Emissions Trials				
Battery Electric HDV (consumption)	40%	142,366	203,380	kWh
Battery Electric HDV (emissions)	296gCO ₂ e/kWh	42	60	tonne CO ₂ e
Saving		69	98	Avoided t CO₂e
<i>Saving over 10 year life of connection</i>		<i>688.10</i>	<i>983.00</i>	<i>Avoided t CO₂e</i>

What is needed to incentivise less polluting Light Commercial Vehicles?

The FTAI is, through its TruckSafe™ & VanSafe™ standards, encourages members to have sustainable and pro-active fuel management policies and systems in place for their commercial fleet operation. These programmes aid operators consider transition to alternative fuelling technologies whilst at the same time prioritising staying safe on the road. The changeover to alternative fuels within the haulage sector is happening at a much faster pace when it comes to LCVs in comparison to HGVs, with LCVs predisposed to transition to electric vehicles due to a growing number of options on the market, and with a particular benefit that newer model LCVs have increased range. It is recommended:

1. Further toll charge reductions should be provided as an incentive to transition to an electric LCV.
2. Funding needs to be provided to suppliers of chargers and alternative fuel facilities to ensure a well-maintained infrastructure.
3. With a high proportion of LCVs taken home by drivers after their days work, home chargers should be included for funding those operating company electric vehicles.
4. Grants should be available for commercial chargers for leased vans and not limited to owned vehicles.
5. The Price of alternatives need to be comparable to diesel.
6. Infrastructural development is essential to increase the availability and accessibility of places to fuel/recharge.
7. Commercial SEAI grants for LCVs should at the very least match private vehicle grants.
8. Clarity should be provided on how the electricity that is used to recharge vehicles is produced (e.g. how much is from a renewable source)



9. At the point of purchase, more details and guidance should be provided on how and where batteries are sourced, how they are manufactured and disposed of, including the cost of disposal. Clear guidelines including cradle to grave lifespan of the battery should be provided to create more trust and confidence that the technology is truly better for the

Infrastructural development is essential to increase the availability and accessibility of places to fuel/recharge.

environment.

When businesses are considering changes to their own operations in terms of environmental impact, it is important that all facets of their business mirror this strategy. Procurement practices must change to match the environmental policy of the business putting alternative fuels, fuel management programmes and other key indicators to the fore of the decision-making process for tenders. Checking that companies are not paying lip service to environmentally friendly practices must be introduced to protect the integrity of schemes introduced to promote environmentally friendly practices. State agencies, like all private sector organisations, that use, or contract commercial vehicles need to change procurement practices to take account of services that are transitioning to alternative fuels and or use the most modern Euro VI engines and have (documented) fuel management plans in place. Upon winning contracts independent operator compliance auditing should be introduced to ensure that all contractors are adhering to the service levels they promised during the tender process.

In addition to the information already contained in this section consideration must also be given to the implications of increased taxes on fuels essential for the haulage sector.

From 1 May 2021 the carbon charge on certain mineral oils and vehicle gas increased from €26 to €33.50 per tonne of CO₂ emitted.

The current rate of excise applied to natural gas for transport use should be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 50% of the HGV and Bus national fleet. Extension of the low excise rate of €2.60 per GJ on natural gas as a vehicle fuel would also allow for delays to infrastructure provision as well as taking account of vehicle purchase decision cycles.

The current rate of excise applied to natural gas for transport use should be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 50% of the HGV and Bus national fleet

In order to ensure that the freight and logistics sector in Ireland can continue to trade cost-effectively in a post-Brexit environment, it is important that the Government does not increase diesel fuel duty for commercial vehicles. Currently, the rate of excise charged on petrol is 58.7 cent per litre, including a 4.6 cent carbon charge. The corresponding rates for diesel are 47.9 cent, with a 5.3 cent carbon charge. Fuel Equalisation is being touted as the solution to air pollution for the private motorist reliant on diesel fuelled cars.

Fuel costs now represent a third of the total cost of the operation of an articulated lorry. Additional increases in fuel costs would need to be passed on to customers, which could mean the death knell for new trading partnerships and a severe restriction on potential trading expansion for shippers, at a time when they need as much support and stimulus for trade as possible.



Rather than increasing fuel tax across the board on the logistics sector, FTAI recommends the Government incentivise the industry to run its vehicles in the most fuel efficient and environmentally friendly way. The freight industry is under continued pressure from legislators, consumers, and society to improve efficiency and reduce carbon emissions. With existing support from Enprova and SEAI, essential users can improve their fuel performance and thus reduce their emissions. The big benefit of improved fuel performance is firstly to the operators' bottom line as profit. Through a CO₂ tax discount based on improved performance, a strong signal can be sent to operators that fuel performance also matters when it comes to improved air quality. Gathering such performance data offers the opportunity to underpin future Government Policy with hard data from the industry itself, on elements such as vehicle choices. Developing a culture where the operator is developing a culture of fuel efficiency will automatically translate to future adaption by the industry of alternative fuel technologies. Support and incentives must be provided to industry to this end. In addition, there should be tax breaks for CNG / LNG and electric vehicle adaption.

Should eco-driver training be rolled out further, for example, as part of Driver CPC training?

Eco-driver training is viewed by FTAI as a critical factor in reducing CO₂ emissions and is promoted by the FTAI through its TruckSafe™ and VanSafe™ standards. However, Eco-driving needs to be defined, understood and implemented in a manner that delivers results.

Eco-driver training is viewed by FTAI as a critical factor in reducing CO₂ emissions and is promoted by the FTAI through its TruckSafe™ and VanSafe™ standards. However, Eco-driving needs to be defined, understood and implemented in a manner that delivers results, with a blended approach taken to eco-driving that includes in-cab training and classroom modules. Definitions and standards, reflected in reporting requirements would be more effective in what is already a competitive market. In addition, the Transport Manager CPC programme should be overhauled to reflect the technology and tools that future drivers and transport managers will be dealing with in the next 10-20 years.

Reducing fuel consumption positively impacts the environment and provides extensive improvements to the logistics operation. Business costs are lowered through savings on fuel purchasing and reductions in vehicle maintenance. Other benefits include improved road safety for both the professional driver and other road users. The provision of Eco-driver training should not only be encouraged through the driver CPC module but also supported through the development of a code of practice for safe fleet operations, to include guidance regarding risk assessments and training for drivers similar to the driving for work programme¹⁵.

Linking the necessity for training with the benefits of the training must be supported by consistent messaging by all stakeholders. As an example, employers have a responsibility under health and safety legislation to carry out risk assessments and implement control measures to reduce or remove risk. Driving is the highest risk activity for professional drivers and as such needs to be supported by appropriate training, with Eco-driver training being part of this training and acting as a control measure to manage this risk, while at the same time benefitting the environment.

¹⁵ <http://drivingforwork.ie/employer-resources/>



Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

Local authorities for Ireland's main urban centres need to review their freight distribution movement plans and develop a more freight friendly strategy that takes account of the environment, traffic congestion, local residents, vulnerable road users and the distributors themselves. The focus should not be on new solutions for distribution but on development of solutions that can maximise the efficiencies for operators trying to access our urban settings. There are different solutions for different sectors of industry, some of whom already do a high degree of consolidation as it is the basis of their business.

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The basic premise of this approach is the more efficient they are the better from a cost perspective and service efficiency. Within the express delivery industry specifically customers pay for an end-to-end delivery. This is often with a timed delivery guarantee. Consolidation centers then disrupt this relationship.

In terms of consolidation within the express parcel sector the following key issues should be considered:

- Consolidation could actually drive inefficiencies through additional journeys, double handling of packages, vehicles dropping off volume and then traveling back empty leading to increased empty running.
- From a GDPR perspective, any sharing of (personal) customer data presents legal challenges and increases risk.
- Every element of the supply chain is critical, however the final mile (where the item leaves the consolidation center on the final leg of its delivery journey to the customer) is where the greatest impact can be made in terms of the customer experience, so who would be responsible, and pay, for the final mile?
- Who would deal with the customer service issue on the final mile in case of loss, damage, delayed deliveries?

Micro consolidation sites within city centers do have value and should be explored. This offers the opportunity to deliver to designated hubs with perhaps double trailers where one is dropped in one location and one in another. The trailers are switched regularly and have goods for onward delivery reducing the amount of empty running. Both centers could be served by e-cycles / e-vans for both distribution and collection.

Other sectors may also consider consolidation centers as an opportunity to deliver efficiencies that reduce empty running and maximize efficiencies, particularly in the case of smaller businesses.



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.

In the medium term, if not beyond, the national and international haulage sector and those in the freight distribution and logistics sector will be adversely affected by the climate policy in Ireland. The timeframe is dependent on the availability of net zero fuelling technologies and the infrastructure necessary to sustain them. As the infrastructure is developed to support alternative fuels the industry will remain reliant on diesel. Whilst there will be increasing numbers transitioning to alternative vehicles such as CNG/LNG/Electric, and to a limited degree hydrogen, the vast majority will continue to operate diesel vehicles. To ensure a vibrant and competitive marketplace it is very important that the increase in carbon tax and the cost of diesel does not compromise SMEs and those operating diesel-powered businesses who have no alternatives due to prohibitive costs of the new technology, the lack of availability of the technology or where the infrastructure has not been developed to support the new fuelling technologies.

To ensure a vibrant and competitive marketplace it is very important that the increase in carbon tax and the cost of diesel does not compromise SMEs and those operating diesel-powered businesses who have no alternatives due to prohibitive costs of the new technology, the lack of availability of the technology or where the infrastructure has not been developed to support the new fuelling technologies.

The following issues must also be considered when promoting efficiencies within the haulage sector:

- A key challenge faced with an expanding electric fleet is not having enough grid capacity to charge these vehicles simultaneously at peak times in the evening. It is not feasible to charge the vehicles during the day as they are on the streets carrying out multiple deliveries with only minimum time spent at each location. Grid upgrades can be extremely costly and when combined with the cost of an EV, this can be prohibitive for some companies.
- Allow more efficient delivery opportunities outside peak hours. HGVs are getting quieter every year with “silent” electric HGVs due from 2025. This needs to be considered when planning / revising urban delivery rules.
- Make narrow delivery time windows wider to allow HGVs to cope with the unusual traffic patterns to come. Make this change permanent to save emissions (Prof. Alan McKinnon et al).
- Incentivise the move to alternative fuelling technologies for HGVs. Support CNG / LNG, biogas; electric and other progressive cleaner fuelling options such as hydrogen. Grant increased access to city centre and city deliveries through a registration scheme. Reduce future Low Emission Zone (LEZ) permit fees for those fleets with accreditation for safety and environmental management e.g., FTAI VanSafe™ and TruckSafe™.
- Barrier free tolling - Allow all HDVs to use barrier free tolling lanes at toll booths. The lanes already exist, the technology is in place and the tags are already on most vehicles.
- Improving performance of existing vehicles and supply chains
 - Improving vehicle performance in L/100km and L/Tonne/Km directly reduces CO2 emissions and improves air quality. FTAI Managers Guide to Distribution Costs 2019 (2020 survey ongoing) shows average fuel consumption is 25/100KM with the average daily distance being travelled by HDVs being 328.5km. 72% of respondents monitor fuel consumption for their commercial fleet.
- Capital support to de-risk service station supply of alternative fuels for electric / CNG / LNG etc.
- Confirm lowest rate of tax will be for Euro VI / 6d where Adblue is being used and not by-passed and implement now to stop imports of “dirty” Euro I-V commercial vehicles.



- Incentivise purchase of Euro VI and CNG vehicles with reduced road tolls and clarity (Euro VI) on LEZs. HGVs bought today will be on the fleet for next 4-5 years and on-road for 10-12 years.
- The current rate of excise applied to natural gas for transport use should be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 30% of the HGVs and Buses national fleet.
- It costs over €1 million to install a fast fill CNG filling station in a private operator's yard. Due to current regulation the private 'early adaptor' cannot sell on the CNG. The cost of installation makes the transition to CNG prohibitive. Many larger HGV fleet operators buy their diesel fuel in bulk and supplement their onsite refuelling with access to the forecourt network through fuel cards. This is not currently possible for CNG. The causeway project¹⁶ aimed to deliver 14 publicly available refuelling sites by the end of 2020. Currently there are 3 (as of July 2021) in Ireland dispensing CNG. To support the commercial fleet operator, the transition to alternative fuels that work for them and are better for the environment, the Government must have appropriate mechanisms in place at a national and local level to remove barriers to adoption.
- Develop clear safety guidelines to support the transition to alternative fuelling technologies.
 - Enforce higher standards and stop low quality entrants in the sector. Specify Euro VI / CNG / LNG minimum for all future Government grants and funding programmes thus reducing operator uncertainty and helping accelerate investment. This would immediately slow imports of used Euro I-V HCVs.
 - Last mile delivery - Support cargo bikes. Congestion charges in urban areas
 - Smart Motorways – betting traffic Management, particularly in Urban centres
 - Encourage holistic approach to carbon transition by providing necessary education and training to develop competencies.
 - Link with the transition to low carbon operations with improved efficiencies and overall business savings through more efficient operations – Support the cultural shift by encouraging more Eco-driver training.
 - Support Biomethane production in Ireland.
 - Develop education and training modules within all training and education programmes for the transport and logistics sector as well as for trade apprenticeship such as mechanical engineer.
 - Support initiatives like FTAI's TruckSafe™ and TruckSafe™ Green Standard / VanSafe™ by reference them as examples that deliver in terms of better fuel efficiency, improved environmental performance particularly the TruckSafe™ Green Standard
 - TruckSafe™ and VanSafe™ support the transition to better environmental management by:
 - Education and awareness of good environmental practices
 - Supporting cultural shift
 - Creating awareness of fuel efficient and good environmental practices that deliver operational efficiencies.
 - Recognising best practices
 - Supports efficient business practices – environmental practices are part of management strategy.
 - State agencies charged with enforcement at our ports must engineer solutions (and have appropriate resources) to limit delays for hauliers. All unnecessary queuing of trucks adds increased emissions reducing the air quality in our port environments.
 - Good Traffic Management plans to reduce traffic congestion will improve air quality particularly at our ports and on the M50
 - Review traffic plans regularly and all stakeholders must work collaboratively in the Port areas to deliver effective and efficient traffic management.

¹⁶ <https://www.gasnetworks.ie/business/natural-gas-in-transport/the-causeway-project/>



- Education campaigns to educate non-HGV drivers of the appropriate lane to use and lane discipline on motorways and dual carriage ways.
 - The adoption of penalty points/sanctions for those drivers not adhering to proper lane discipline should be considered.
- Sufficient infrastructure must be provided at ports to support the services that are provided. The increase volumes of unaccompanied trailers shipping between Ireland and GB and continental Europe dictate that increased parking areas for the trailers need to be provided.
- Prioritise and encourage double length trailer usage. The permit requirements for longer combinations must be reviewed to support a more flexible process that encourages operators to consider longer vehicles.
- HVO – Hydrotreated Vegetable Oil
 - A Sustainable Aviation Fuel (SAF) is needed as 35% of Ireland’s exports by value go by air.
 - When made from wastes and green hydrogen, HVO can deliver 80+% CO₂e/GHG reductions and cleaner exhaust emissions from existing diesel and aero engines. As an island with a need to decarbonise HGVs for exports surely there is a case for supporting for HVO?
 - The fuel supply industry is waiting on Government, excise can be waived to accelerate demand in the forthcoming 2022 budget for this bridge fuel to electric.

ROAD SAFETY

Driving for a living is a high-risk occupation with the likelihood of being involved in a road traffic incident 40%¹⁷ higher than it is for other road users. Understanding rules of the road and adhering to the road safety rules in the jurisdiction you are driving in is a basic requirement for all professional drivers. Since its inception in 2006, the RSA, through effective media campaigns, has been successful in bringing to the fore the importance of road safety. For commercial fleet operators there is a myriad of legislation and guidelines that must be observed such as speed limits, weight limits, roadworthiness of vehicles, working time and tachograph regulations, intoxicated driving, safety, health and welfare of drivers, operator licencing and rules for international transport. The employer must ensure that their employees meet their legal obligations for the safe operation of their vehicles, and drivers must understand and respect road safety obligations which impact not only themselves but other road users, as well as the need to safely secure and protect their loads.

Between 2003 and 2012, almost half of the 573 reported deaths arising from workplace accidents were vehicle related¹⁸. The workplace for haulage drivers is the cab of their HGV. Creating more awareness around the implications of poor driving behaviour for the safety of the driver and other road users is one of the main areas that should be focused on within this section of the strategy. Linking health and safety and road safety with good clear guidance and information specifically for the haulage sector will go some way to supporting improved road safety. The freight distribution and logistics sector have made a significant impact on improved road safety standard through pro-active training, investment in new safer technologies and adherence to rules and regulations.

We make the following recommendations to support compliant operators:

¹⁷ <http://drivingforwork.ie/employer-resources/>

¹⁸ https://www.hsa.ie/eng/Vehicles_at_Work/Work_Related_Vehicle_Safety/Work_Related_Vehicle_Statistics/



1. The haulage sector operates on very tight margins and is intensely competitive. To ensure all operators are adhering to the rules around working time, tachograph requirements and roadworthiness for example, there must be effective enforcement. For effective enforcement, the authorities charged with regulating the industry must be sufficiently resourced.
 - a. In the instance of enforcing tachograph and roadworthiness rules, the RSA is the competent authority but only has 16 Transport Officers/Vehicle Inspectors. Their powers are limited in that they must be accompanied by a member of An Garda Síochána at road side checks, therefore they need to be well planned and organised which offers limited flexibility. Unlike some other jurisdictions there are no powers to immobilise vehicles where there are issues with cabotage, roadworthiness or tachograph.
 - b. As the EU Mobility package is being introduced on a phased basis, with new requirements for posting of workers, cabotage, and operator licencing for van operators a review must take place in Ireland of the powers afforded to the RSA inspectors.

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2. As mentioned earlier in this document under the heading of Operator Licensing, having a body that is responsible for the sector (Traffic Commissioner) would assist in creating a more dynamic approach to effective enforcement, a greater understanding of the rules around compliance, and the development of effective outreach programmes for mutual benefit.
3. The inadequate number of RSA Transport Officers/Vehicle Inspectors is exploited by non-compliant operators which in turn has the impact of creating an uncompetitive environment for the businesses that place an emphasis on compliance and invest in the training and education of their drivers. This in turn has the further consequence of creating a 'black market' that thrives on beating the system whilst at the same time making the sector unappealing to new entrants.
4. The current driver shortage in Ireland is not unique, it is a familiar sight across the UK and the EU. Protecting workers rights, having a level playing field with reasonable rules and fair and effective enforcement are all necessary to ensure the sector is healthy and safe. This is critical in delivering a future for the haulage sector (for whom Ireland will remain reliant to deliver goods) that thrives into the future.
5. CVRT for Trailers – Electronic certs should be issued for all trailers that pass an annual roadworthiness test. Given the advancement in enforcement technologies a digital certificate would support compliance within the industry.
6. Enforcement technologies – technological advancements should be exploited to support compliance and more effective and efficient enforcement through the deployment of the necessary systems to ensure the authorities are keeping pace with change.
7. Licences – support the deployment of one licence that can include data for Tachographs, Driver CPC card: ADR cards, Driving licence information [Smart cards]

What are the road safety priorities in road haulage for the next 10 years?

1. Adopt the Driver CPC training programme to allow CPD (Continuing Professional Development) that would recognise specialised training to qualify for CPD points or credits on CPC modules. This could be in the areas of on road driver (Eco-driver) training, safe and secure loading training, tachograph training etc.



2. As technology advances and new fuelling technologies are introduced such as CNG, LNG, Electric and Hydrogen new road safety campaigns and guidance should be developed to promote the effective and safe driving practices and utilisation of the new technologies.
3. Develop more engagement with commercial fleet operators to ensure road safety messages are aligned and filtered down to all organisations, through the establishment of a road safety industry working group.
4. Fair and effective enforcement is critical to compliance, with the deterrent effect of law enforcement directly related to the perceived certainty of detection and punishment. Prosecutions for tachograph and roadworthiness offences are rare. More effective enforcement through the use of Graduated Fixed Penalties should be introduced and utilised as appropriate by Transport Officers/Vehicle Inspectors and An Garda Síochána, as more effective enforcement would increase compliance with roadworthiness of vehicles and tachograph and working time regulations.
5. Cabotage and Operator Licencing Offences: prosecutions take a long time and resources to be dealt with in court. The Road Safety Authority have had some success in the Courts against non-State operators¹⁹, it would be much more preferable that both the RSA and the Gardai would have a capability to stop an operator from proceeding with a journey in circumstances that there is clear evidence of breaches of the cabotage and operator licencing rules. Enhanced powers to deal with the alleged offence at the time of the detection is essential to combat effectively those engaged in illegal cabotage and unlicensed haulage.
6. The level of enforcement must be such as to act as an incentive to non-compliant operators to either change their ways or stop operating. Responsibility to reach the required levels of enforcement to achieve this falls to both the RSA and An Garda Síochána. Relevant training, equipment and allocation of RSA and Garda resources is a prerequisite.
7. Review the CVORI and publish annual findings in relation to the state of compliance of commercial vehicles, including the key roadworthiness issues, as well as the results from premises inspections.
8. Carry out media campaigns on the correct use of lighting for vehicles to include flashing amber light usage, lighting for abnormal loads, blue lights, doctors, fog lights etc. Provide clear guidance to ensure the safe use of lights and create awareness as to what the different safety lighting is for.
9. The RSA should develop stronger links with industry through consistent engagement with trade associations and collaborative outreach programmes.
10. Milk collection operations should come in under the tachograph regulations as this service is predominately carried out by the licenced haulage sector. If it becomes part of the tachograph requirements it removes significant uncertainty around 'in scope' and 'out of scope' driving.
11. Develop more focused promotional activities on topics of importance to the haulage sector such as medical fitness, the importance of good eating habits and the links with improved road safety.
12. Work with industry to create awareness of the risks associate with driving a HGV should be prioritised with a focus on those that contract these services and to include issues such as;
 - a. Driver Behaviour and what influences poor behaviour.
 - i. Lack of understanding of reasons for delays.
 - ii. Unnecessary delays with no explanation

¹⁹ <https://www.donegallive.ie/news/news/645821/hefty-fine-for-northern-ireland-company-caught-breaching-eu-regulations-in-donegal.html>



- iii. Poor welfare facilities for drivers at delivery destinations.
- b. Working time / Tachograph rules for drivers
 - i. Impact of delays on the road
 - ii. Impact of delays at delivery sites
- c. Importance of good communication with drivers
- d. Importance of good communication between the employer and drivers

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How are these priorities best addressed?

1. Industry engagement should involve representative trade associations, relevant Government departments, the RSA, and the HSA. Clear terms of reference should be developed, and annual priorities and actions agreed to improve road safety. An annual report on progress should be published.
2. Industry review of the Driver CPC training regime. Examine and explore CPD opportunities and develop consensus for change.
3. Specific actions should be developed with clear allocation of responsibility. As mentioned, active engagement with stakeholders should be encouraged. For each point, stakeholders must be identified and approached to work collaboratively towards achieving the desired outcome.
4. A cost benefit analysis should form part of a prioritisation and assessment of actions under the Strategy.
5. Necessary provision of resources for the RSA to recruit additional Transport Officers/Vehicle Inspectors.
6. Necessary provision of resources for An Garda Síochána to increase the numbers in the Garda Roads Policing with commercial vehicle expertise.

What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?

- Regular engagement with stakeholders that are willing to work collaboratively with the RSA, inclusive of not just the haulage but also the own account sector.
- RSA to appoint a member of staff with the sole responsibility for liaison with the freight distribution and haulage sector.
- The CVORI needs to be re-invigorated to establish trust within the industry that it is a scale of compliance and something that should form part of all conscientious operator's operation compliance targets. (A lot of work was done in the early days in relation to the rollout of CVORI)

Regular engagement with stakeholder that are willing to work with the RSA, inclusive of not just the haulage but also the own account sector.



and to highlight its importance, however, an absence of ongoing communication has resulted in an understanding of the relevance to industry being diminished.)

What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?

All operators, irrespective of size, are bound to operate under the same rules and regulations. Small operations have the same obligations to safety as larger businesses. However, the rules at both national and European level are both numerous and subject to regular change (e.g. Mobility Package), making it is increasing difficult for all operators, as well as enforcement authorities, to keep up to date with the requirements. As a trade association for the sector, FTAI publish member briefing notes to keep members up to date with their requirements. When businesses adapt and adhere to the changed requirements and other don't, an uncompetitive environment is created. More must be done by the State to ensure fair enforcement and to support all business, both large and small, that invest in compliance.

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- Road traffic, and other legislation relevant to the haulage sector, is extremely difficult to follow because of its complexity and the fact that it is fragmented as a consequence of numerous amendments.
 - The legislation should be consolidated with a view to ensuring:
 - It is relevant for the times we live in.
 - The language used is more easily understood.
 - It is segmented in a structured and organised manner making it easier to follow.
 - Legal obligations are easily identifiable and the legal consequences for non-compliance are clearly set out.
- The RSA, HSA and other stakeholders should work collaboratively with the haulage sector to provide sector specific road safety education campaigns covering such topics as:
 - Speed compliance.
 - Intoxicated driving.
 - Distracted driving.
 - Fatigue and taking of rest periods.
 - Safety at service stations.
 - Medical fitness to drive and the importance of healthy eating habits.
 - Safe and secure loading.

Do you have any other comments on road safety matters?

- The Government should establish a new Office of Traffic Commissioner to drive reform and work with relevant stakeholders, including Government departments, An Garda Síochána, the RSA and HSA, for the purpose of ensuring, amongst other things, only competent and reputable people operate within the haulage sector and a more collaborative approach is taken to non-compliant operators.
- Graduated Fixed Penalties – enable enforcement authorities to issue on the spot fines for infringements in tachograph / minor roadworthiness offences, thus reducing the time spent



by enforcement authorities in court as well as the burden on the court system so it can deal with more serious issues, while at the same time serving to encourage more compliance on the minor issues.

- More safe and secure rest areas on national routes.

MOBILITY PACKAGE

What are your views on how Ireland implements the Mobility Package changes?

The Mobility Package contains significant changes that have far reaching implications for the freight distribution and logistics sector as well as for the authorities assigned with responsibility for enforcement of the package requirements. The Mobility Package introduces new mandatory operator licensing requirements, but it also introduces optional requirements that Member State may decide to impose.

Like all regulations and legal obligations, it is up to operators to understand the legal requirements to carry out their commercial duties in a safe and legal manner. It is up to the enforcement authorities to carry out enforcement in a fair, proportionate and consistent manner. The issues contained in the Mobility Package such as the changing requirements for posting of workers; cabotage changes; changes to working time; and return of the vehicle and operator licencing for international van operations, will create a set of minimum standards that need to be met and adhered to, which are designed to improve working conditions and safety for drivers. To protect fair competition of international transport, the authorities must be resourced sufficiently to carry out effective and consistent enforcement. The following must be considered:

- Mobility Package implementation will rest with different Government departments. Given that there are significant new requirements for the operation of commercial transport in Europe, this is another example to support the establishment of a 'body' with overarching responsibility for commercial transport operations.

Mobility Package implementation will rest with different Government departments. Given that there are significant new requirements for the operation of commercial transport in Europe, this is another example to support the establishment of a 'body' with overarching responsibility for commercial transport operations.

- Authorities responsible for regulation and enforcement must provide regular updates to industry on the new requirements to ensure all have the ability and means to be compliant.
- Discretion is allowable for the implantation of elements of the Mobility Package. It is important that authorities in Ireland do not create an unfair environment for Irish business by not implementing elements of the Package that are rigorously enforced in other Member States.
- The Department of Transport is currently responsible for operator licencing in Ireland. Will Van licencing sit in this Department?
- Operator licensing will be newly applied to vehicles with a maximum permissible mass exceeding 2.5t and up to 3.5t which are engaged in international transport operations. It should only be applicable for journeys undertaken for hire and reward and exclude own account operations.



What are your views on the return of the truck?

Regulation 1071/2009 as revised by the Mobility Package creates a new obligation in relation to operator licensing:

“An undertaking shall organise its vehicle fleet's activity in such a way as to ensure that vehicles at the disposal of the undertaking and used in international carriage return to one of the operational centres in that Member State at least within eight weeks after leaving it.”

This provision is aimed at addressing unfair competition concerns on the part of Member States whose geographical situation makes them prone to competition from countries with lower labour costs. FTAI believes this new provision is laudable but raises the following challenges to its implementation:

- The concerns of Member States are partially addressed by the minimum wage schemes in place in several countries. Irish hauliers carrying out international transport are therefore subject to these administrative requirements, which do create red tape, even if Irish salary levels don't risk undermining competitors on the basis of labour costs. FTAI therefore warns against multiple layers of requirements to address the same concern as this makes compliance and enforcement unnecessarily more complex.
- While many Irish companies already operate on a model where the HGV returns to Ireland at least every eight weeks, the provision creates unintended consequences for specialist hauliers. An example of this are companies which move equipment on concert tours across Europe, some of which can last longer than eight weeks, and provide an end-to-end service to touring artists and their crews. This is a key customer requirement and is essential to service quality in this very specific market segment where the route, schedule and logistics are dictated by venue availability. While this segment of the market is relatively modest in size at present, the consequences of Brexit (and reduced EU market access rights for UK-based touring companies which currently represent 85% of the touring market) are bringing new opportunities for Ireland. There is some evidence of UK companies considering relocation to Ireland. As Ireland attracts more of these companies, the return of the vehicle issue will become a more sizeable one, albeit EU legislators were only ever targeting a totally different part of the market.

While many Irish companies already operate on a model where the HGV returns to Ireland at least every eight weeks, the provision creates unintended consequences for specialist hauliers. An example of this are companies which move equipment on concert tours across Europe, some of which can last longer than eight weeks, and provide an end-to-end service to touring artists and their crews.

- In market segments that aren't operating an eight week return pattern yet, the requirement will increase unnecessary empty runs, with detrimental economic and environmental consequences. The European Commission's impact assessment itself estimates that *“the provision is likely to create additional journeys, potentially resulting in up to 2.9 million tonnes of additional CO₂ emissions in 2023 (a 4.6% increase in international road freight emissions). Across the three scenarios that were studied, the increase in CO₂ emissions ranges from 0.8% to 4.6%.”*
- Ireland being an island State, FTAI seeks consideration for compensation for the increased costs of connectivity with continental Europe and or a derogation seeking an exemption from the requirement to return to Ireland within 8 weeks.



ROAD INFRASTRUCTURE

Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?

Quality of service and rest areas for commercial travellers have improved in Ireland particularly linked with the investment in the road network. As a starting point consideration must be given to our key strategic ports and the facilities available to drivers. Ireland needs to ensure that it is on par with the requirements to adhere to the Mobility Package requirements for safe and secure parking for commercial drivers. The European Access Point for Truck Parking Data will enable continuity of services throughout the EU. This system aims to provide access to safe and secure HGV parking data in DATEX II format. At this moment, the Access Point only supports static data²⁰. The responsibility for data quality and the necessary updating/maintenance obligations remains with the Member States that are submitting the data to the Access Point. It is important that Ireland participates on this programme as we are reliant for the movement of goods by international hauliers and their drivers. Creating a connection with this information will help planning of rest periods and support the welfare of drivers.

The EU commission is looking to develop consistent guidance for Member States on safe and secure parking facilities. TII has implemented plans to have on-line service areas on motorways and high-quality dual carriageways, on average, every 60km.

From the perspective of the haulage sector, facilities must include the following:

- Areas for commercial vehicles to park safely and securely, allowing drivers take their mandatory break and rest periods (including overnight parking).
- Refuelling facilities catering for all fuel types and electric charging.
- Suitable toilet and shower facilities. (Maintained and regularly cleaned to the highest standards. Currently many are filthy and in a poorly maintained state - broken doors, toilet seats etc.)
- Comfortable social rest areas.
- 24/7 availability of healthy food options.

As alluded to throughout this submission, fair, proportionate and consistent enforcement is critical to the sustainable implementation of compliant operations and drives a culture that recognises the legislation and the regulations as underpinning a fair, competitive safer environment for all. On-line service areas should therefore also incorporate facilities that allow all agencies charged with monitoring compliance with all aspects of legislation relevant to the haulage sector, carry out compliance checks and appropriate enforcement, including immobilisation of vehicles should this be provided for into the future.

What more is needed in relation to road user charging for freight transport in Ireland?

- Clear guidelines need to be developed advising industry of the plans for future road user charging for freight transport.
- The change in the emphasis on road user charging at EU level [*Directive 1999/62/EC provides the legal framework for charging HGVs for the use of certain roads. The directive aims to eliminate distortions of competition between transport undertakings by a step-wise harmonisation of vehicle taxes and the establishment of fair mechanisms for infrastructure*]

²⁰ https://ec.europa.eu/transport/themes/its/road/action_plan/intelligent-truck-parking_en



charging] 'to make the polluter and user pay is difficult to argue against, especially as the proposal now relates to HDVs and the inclusion of cars and vans, not just HGVs as has been the focus in the past. However, the extent to which the polluter/user pays principle will be taken up by politicians is debatable as there has always been a fear of upsetting car owners.

- A common approach to road charging to provide a benefit to the industry overall, against the increase in costs as a result of charging and tolling. FTAI would like to see the money collected to provide better infrastructure within certain constraints. This investment could be put into better service facilities for drivers and improved road enforcement facilities for the Gardaí and RSA Transport Officers/Vehicle Inspectors. The safety of all road users is paramount including the safety of the authorities charged with ensuring road user compliance.
- Advances in engine technology, led by changes to HGV engines reducing particulates and the better performance of Euro 6 on NOx should result in reduced road charging rates. Users of Alternative fuels (to petrol/Diesel) should benefit from reduced road charging rates. This could form the basis of additional incentives to encourage operators to move to cleaner fuelling technologies sooner.
- The current reduction in Toll rates for users of 'Alternative Fuels' should continue.

LABOUR MARKET SKILLS

The freight distribution and logistics industry is a vibrant and vital sector for the economy of Ireland, contributing in excess of €1billion a year to the exchequer in the form of PAYE, PRSI and road taxes. The transport sector in particular has been less successful than others in recruiting younger workers. There are many reasons for this, including a perception that it is made up of predominantly low skilled jobs, working hours are long, unsociable, and unpredictable, and there isn't an obvious career path. This perception must change. Unfortunately, because of this perception the transport and logistics sector is suffering from a serious skills shortage across all levels which hinders progress and makes dealing with change within the transport and logistics sector extremely difficult. We need to question why there is a skills shortage in the first place.

The labour needs of the freight, transport, distribution and logistics sector are developing as forecast in the 2015 EGFSN report²¹. At the time of 2016 Census there were 49,470 people working in this field. In the absence of a major external shock the labour needs of the sector are expected to increase to 66,204 by 2025²². Given the age profile of people working in the sector, approximately 13,752 of those currently working in the sector are expected to retire by 2025. In summary, a total of 30,486 individuals will have to decide to take up careers in the sector and receive all the necessary training between now and 2025 in this baseline scenario.

Table below is page 103 of the report <http://www.skillsireland.ie/Publications/2015/18022015-Freight-Skills-Publication-pdf.pdf>

²¹ <http://www.skillsireland.ie/Publications/2015/18022015-Freight-Skills-Publication-pdf.pdf>

²² <https://dbei.gov.ie/en/Publications/Publication-files/Skills-needs-potential-trade-implications-Brexit.pdf>



Table 7.9: Baseline employment, forecast demand and shortfall by core FTDL occupations

	2011		2020 Demand		Shortfall 2020	
	Baseline	Recovery Scenario	Delayed Scenario	Recovery Scenario	Delayed Scenario	
HGV drivers	19,758	25,201	23,920	8,406	7,125	
Mobile machine drivers & operatives n.e.c.	5,426	6,921	6,569	2,230	1,879	
Managers & directors in storage & warehousing	4,071	5,193	4,929	1,430	1,166	
Managers & directors in transport & distribution	3,497	4,460	4,234	1,381	1,154	
Fork-lift truck drivers	3,074	3,921	3,722	1,135	935	
Transport & distribution clerks & assistants	2,767	3,529	3,350	951	772	
Aircraft pilots & flight engineers	1,622	2,276	2,117	765	606	
Other drivers & transport operatives n.e.c.	1,278	1,630	1,547	583	500	
Air transport operatives	1,135	1,593	1,482	529	417	
Rail transport operatives	999	1,274	1,209	393	329	
Tram & tram drivers	670	855	811	229	185	
Ship & hovercraft officers	623	747	719	230	202	
Marine & waterways transport operatives	543	651	626	190	165	
Importers & exporters	332	423	402	148	126	
FTDL-14	45,795	58,676	55,636	18,601	15,562	

The FTDL-14 encompasses four categories of road freight drivers: HGV vehicle drivers, fork-lift truck drivers, mobile machine drivers & operatives, and other drivers & transport operatives. These four categories comprise approximately 60% of the total baseline supply.

The shortfall as a percentage of 2011 employment conveys the quantity of labour needed relative to the baseline quantity. The results are set out in Table 7.10 below. The occupation-level shortfall rates range from 28% to 37% in the Delayed Adjustment Scenario and from 34% to 47% in the Recovery Scenario.

The demand for HGV drivers also ranks highly in terms of relative shortfall: 5th highest, at 43%, in the Recovery scenario and only one point lower than the highest, at 36%, in the Delayed Adjustment Scenario. This reinforces the need for additional drivers in almost any economic scenario. Indeed, even with no change in output, there would be a shortfall of some three thousand HGV drivers resulting from retirements.

In 2019, Chao Ji-Hyland and Declan Allen from School of Management, College of Business, Technological University Dublin (TU Dublin), published their research study titled ‘*What do professional drivers think about their profession? An examination of factors contributing to the driver shortage*’. In it they reference McKinnon et al. 2017, 111, who highlight that entry-level logistics roles (including drivers) have lower pay and lower status than entry-level positions in other industries, creating an unattractive proposition for skilled workers.

The driver shortage is not a new phenomenon, as it has been well documented a varying level of severity over the past 20 years. What is clear is that function of distribution is critical to efficient logistics and is often taken for granted. The cost associated with transportation is close to 55% of the total cost of logistics²³. A driver shortage hinders supply chain performance and increases costs that ultimately impact the consumer.

In 2017, a new research study for the EU TRAN Committee – ‘*Road Transport Hauliers in the EU: Social and Working Conditions*’ was published. The report has reiterated that drivers in the freight transport industry across Europe felt that the quality of various aspects of their role had deteriorated in recent years, including the standard of their working environment, income levels, the amount of non-standard and standard working hours, and the skilled work involved, creating issues around driver retention. Recognising the issues is critical in determining what solutions are needed to counter the driver shortage problem. If drivers themselves do not get job satisfaction and feel secure in their roles it becomes increasingly difficult to promote the profession to new entrants. But this is not the only issue. A level playing pitch for compliance with how drivers are paid needs to be considered. There is anecdotal evidence that drivers will move jobs for increased cash in hand, based on subsistence payments, that are not necessarily due. This has the consequence of facilitating reduced PAYE and PRSI payments to the State as employers keep the official wages low whilst subsidising the total payments with subsistence payments. Paying drivers for extra shifts outside of normal working hours is becoming more of a problem as drivers are using double tachograph cards to cloak all their weekly driving activity. The link must be made between effective enforcement of the Minimum Wage Act, working time and tachograph rules and correct payment of taxes by employers. The fact we need to mention this highlights the importance of a level playing pitch that is supported with effectively

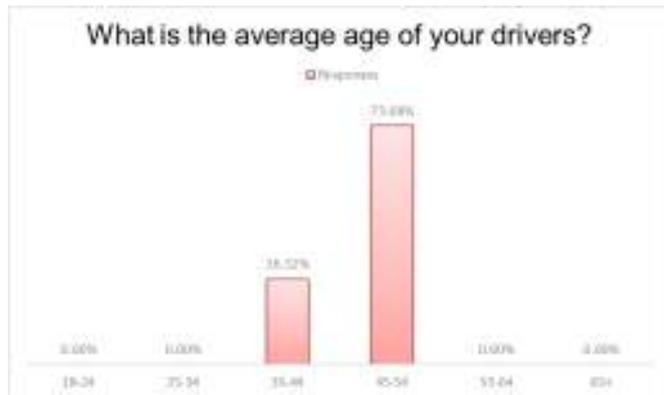
²³ Wilson, R. 2013. 24th Annual State of Logistic Report. Washington, DC: Penske Logistics, Inc



resourced enforcement. The net result if this is done right will deliver a more professional and compliant haulage sector.

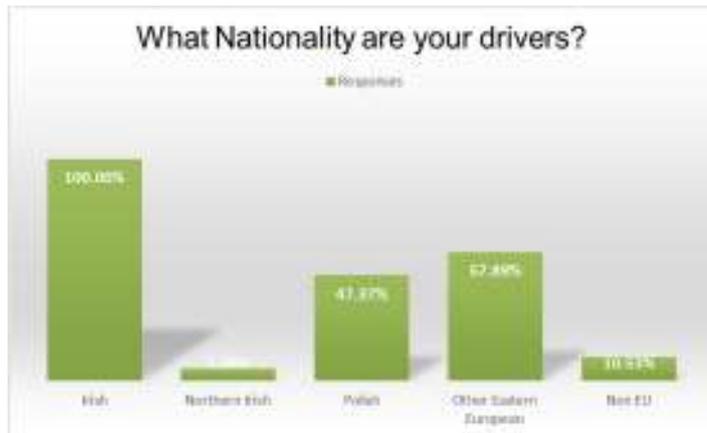
The TU Dublin report cited earlier also highlights those other issues for consideration in the appeal of driving jobs is the demanding and irregular nature of work schedules as a burden of the occupation. Drivers found their erratic schedule put a strain on their ability to balance work and family life²⁴.

A recent survey of FTAI members found that over the average age of drivers for over 73% of respondents is in the 45-54 age category. 26% of respondents average age of drivers are in the 35-44 age category.



When looking at nationality, 100% have Irish Drivers; 47% have Polish drivers and 57% employ other eastern European drivers with only just over 10% employing non-EU drivers. This Cohort participate in the non-EU work permit programme.

A tangible way to bring about a change in the perception of the sector is to invest in training and education. Training and education, upskilling and continuous professional development must become the norm and not the exception, if the sector is to succeed into the future. Industry must truly commit to adding value to careers in their companies and making them attractive to young people.



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.

Haulage sector employers must take responsibility to better promote their businesses and learn to compete for potential employees. Key to attracting people into the sector is making it easy for people to understand the available roles and the career progression opportunities linked with the haulage sector. The Logistics and Supply Chain Skills Group is working on mapping out available roles and developing outreach programmes supported by logistics champions that will aid the generation of awareness of the industry.

Haulage sector employers must take responsibility to better promote their businesses and learn to compete for potential employees.

²⁴ Sousa, I. C., and S. Ramos. 2018. “Working Conditions, Health and Retirement Intentions: A Case Study of Truck Drivers.” *International Journal of Workplace Health Management* 11 (3): 114–129.



The *Managers Guide to Distribution Costs Report 2020*²⁵ shows that it is taking over 29 days to fill vacancies and the skills shortage is costing employers over €20,000 in additional costs. The report highlights that there is a gap in the perception that roles are poorly paid with the reality that driver's salaries rose in 2019 by 4.2%, to €35,839 on average, before subsistence payments.

The following should be considered in developing a strategy to encourage more people to take up work in the road haulage sector.:

- Employers must promote their businesses in a more positive manner.
- More robust auditing and oversight of operators by state agencies is required to identify, and hold accountable, employers who exploit drivers by e.g., expecting them to work excessive hours in contravention to working time regulations; no contracts of employment.
- Link qualifications on the National Framework of Qualifications (NFQ) with the profession of professional driving -
 - Support the establishment and delivery of the Level 6 Transport Operations and Commercial Driver Apprenticeship
 - Clearly identify all education and training programmes for the haulage sector.
 - Continue to develop ties between academia and industry.
- Employers must ensure that they have competitive terms and conditions for drivers and other roles that support loyalty within the workforce.
- Better and more consistent enforcement of non-compliant operators
 - Fuel laundering
 - Working time issues
 - Subsistence abuse
 - Brexit issues with imports/exports via Northern Ireland due to lack of enforcement.
- The average size haulage business is less than 6 HGVs. These Small to Medium Sized businesses are traditionally family run. The State can support better succession planning for this cohort through guidance and supports, similar to what Teagasc²⁶ has done for the farming community. With the average age of drivers now increased to over 50 years of age, and in a lot of cases including the business owner, these family businesses need to understand how to encourage younger siblings and/or offspring to get involved in the family business, or at least give them the option and give the younger family members an opportunity to gain experience in the business without having to relinquish ownership. (This is also a great opportunity for the Driver Apprenticeship to be considered as a pre-requisite necessary to support effective succession planning.)
- Consignor Liability – Much more needs to be done to raise awareness within the consignor cohort of their legal obligations when it comes to procuring third party haulage services. Consignors have a vested interest and legal responsibilities in ensuring that their hauliers are operating to the highest professional standards, but some turn a blind eye to such things as working time compliance, roadworthiness of vehicles, and overweight vehicles, instead focusing on contracting the cheapest service. The HSA, through its own activities and the work related vehicles safety committee, and the RSA should develop a robust campaign highlighting (and then reminding) consignors of their obligations in these matters.
- Training programmes should be developed to support consignors' understanding of their legal obligations when procuring third party haulage services.

²⁵ <https://www.ftai.ie/wp-content/uploads/2020/10/FTAI-Managers-Guide-to-Distribution-Costs-2020-Report.pdf>

²⁶²⁶ <https://www.teagasc.ie/media/website/publications/2015/Farm-Succession-and-Inheritance-Guide.V1.pdf>



How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?

The profession of a HGV driver suffers from an image problem with low pay, long and unsocial hours, poor work environment and lone working sited for this perception. The current driver pool is ageing with an average age of over 50 years of age. The consequence of this is far reaching and will have a detrimental impact not just on individual organisations, but on the freight distribution and logistics sector as a whole in a number of years if the issues aren't dealt with urgently. Driving can also be a physical job with some requirement for loading and unloading, therefore it does not always sit well with an ageing work force. It is also important for employers in terms of managing safety and health and wellbeing of their staff that they are considerate of the physical demands the job imposes on their employees. This is assessed during periodic risk assessments. The obligation to do this would suggest that it would be in employers' interest to have a career path mapped out for their drivers with options to move roles within the organisation where possible. The challenge of course is how to attract young people into the profession of driving. The traditional way of getting involved was through family links and succession into the family business. This has changed. Offspring no longer see the job as attractive. This must change.

- Building on the experience of Brexit and Covid-19 government and industry should work together to shift perceptions highlighting the strategic importance of logistics to the Irish economy and criticality of professions such as HGV driving.
- There should be a focus on the aesthetics of the profession of driving. How drivers are presented, do they have uniforms, is personal hygiene of importance to the employer, what PPE is provided to drivers, and is it maintained to a high level.
- Drivers have a significant customer care role. They are the face of the business, so how they present themselves and interact with customers and the public is hugely important in defining the perception of the industry.
- All within the supply chain need to be educated and understand the role of a professional driver. Mapping out the day-to-day role of a driver, through case studies, and presentations by drivers is important in creating awareness of how varied, difficult and rewarding the job is at the same time as developing respect for the position.

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- Employers and stakeholders need to improve their communication with drivers to ensure that if there will be delays, they know and understand why this is the case. When there are gaps in the communication process it creates frustration for drivers who are obliged to work within the working time directive and tachograph regulations.
 - Education of those charged with goods reception in terms of how to interact with drivers needs to be promoted and supported by a form of driver charter – get respect, give respect – standardise demurrage charges etc.
- The freight distribution and logistics sector (including the haulage sector) must become more active in encouraging and promoting gender diversity within the industry.
- Government and industry should work together to ensure the cost of licence acquisition is not a barrier to new entrants.



A point that is linked with raising awareness of the profession and that creates a true perception of the industry is the importance of detailing the job opportunities within the supply chain including the haulage profession in secondary schools.

Creating awareness of the role of professional drivers to young people may sow a seed of interest in a profession that may not otherwise have been considered. The apprenticeship programmes are supporting outreach to secondary schools through organised events and access to career guidance professionals. The Logistics and Supply Chain Skills Group is developing opportunities to get access to schools in this regard.

How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?

Developing a consistent and sustainable outreach to secondary schools and further education providers is important in highlighting the diversity of roles and opportunities that exist in the freight distribution and logistics sector including the haulage sector. Developing a strategy to create awareness within schools through transition year initiatives is one example that can deliver interest in the sector. Working collaboratively through stakeholder committees is also essential in creating a common approach to developing awareness of the sector. This has started in 2018 through the addressing the future needs report and is continuing through the Logistics and Supply Chain Skills Group.

More support is required for the establishment of training programmes and apprenticeships that support the haulage sector. The commercial driver apprenticeship delivered by Sligo IT (lead proposer FTAI) is scheduled to start in January 2022. This apprenticeship will offer significant opportunities through the recruitment of a project manager to highlight the benefits of commercial driving as a profession to students in secondary schools, parents of those students and the career guidance professionals. The Logistics and Supply Chain Skills Group must also harness this opportunity and work collaboratively broadening the scope and outreach of the Group in line with the development of this programme. The experience of the Logistics Associate Apprenticeship and the outreach from the project manager is a prime example of how successful this approach can be. There are over 90 students registered to start first year of this apprenticeship in TU Dublin and Munster Technological University in September 2021.

The haulage sector is changing apace. Technological advancement is ensuring that the industry is becoming more efficient and delivering for the environment. The haulage sector has traditionally been male dominated, however, better promotion of careers within the sector as well as new innovative practices means it will become more appealing generally as a viable profession, with more diversity and less gender stereotyping. Also key to the future success without doubt will be the prevalence of drivers that self-promote their profession.

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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?

Freight transport is to some extent being taken into account, however, there is a significant disconnect between the ambition to become more sustainable and the delivery of solutions that support sustainable logistics in urban settings. City council strategies, such as that of Dublin City Council²⁷, tend to focus on sustainability in terms for consumers and workers moving from cars to active transport to access the towns and cities without consideration for the delivery and collection of goods necessary for vibrant retail solutions. All retail, hotels, pubs etc. require regular deliveries of goods to provide their services. Planning for loading and collection bays appears not to be properly considered, with many sharing space with bus and cycle lanes, resulting in confusion, conflict and risk for road users.

Consideration must be afforded to the following:

- Delivery of a more effective and efficient transport infrastructure.
- Supporting efficient logistics through the planning system - Freight movements are actively discouraged by the planning system from delivery bays to cargo bikes, to the circumference of turns at junctions.
- As part of an integrated transport system, defining and supporting the use of Ultra Low Emission HGVs and give increased access to Low Emission commercial vehicles in urban areas.
- Incentivising integrated freight transport through grants and tax inducements.
- Ensure the power infrastructure required for zero emission vehicles is delivered.
- Carefully considering proposals for HGV restrictions due to the negative impacts of down-sizing.
- Ensuring the power infrastructure required for zero emission vehicles is delivered.
- Supporting vehicle manufacturers in the development and deployment of zero emission vehicles.

Online delivery to homes has surged in the last 18 months with the Christmas peak now becoming the norm year-round for last mile deliveries. However, the 'batch of one' is an inherently inefficient supply chain with large volumes of air freight being shipped by largely unregulated vans for the last mile delivery.

Whilst FTAI member companies have advised that they do their best to work with customers to reduce volumes - by switching from boxes to bags for example – ultimately, Local Authorities need to support urban and town centres with shared services that allow easy collection and returns (reducing 'reverse logistics' volumes).

As part of a more integrated approach to freight transport and transport planning, logistics providers should consider the following:

- Ask operators about their fuel efficiency policies/practices.
- Examine alternative mode possibilities for all trunking movements.
- Facilitate off-peak deliveries wherever possible, especially in urban areas.
- Anticipate in business planning those urban deliveries may become more expensive/difficult in future.
- Support flexible supply chains to facilitate use of alternative power sources for vehicles.

²⁷ <https://www.dublincity.ie/dublin-city-development-plan-2016-2022/7-retailing/75-strategic-approach>



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?

Urban transport plans are, for the most part, deficient as they do not include details regarding freight distribution within urban settings. Urban settings include residents that require home deliveries as well as businesses and retail, hotels, pubs/restaurants, tourist sites etc. All require a complex supply chain to ensure that they are serviced effectively and efficiently. All plans should take account of the complexity of freight distribution rather than taking it for granted. In a lot of cases planning permission is granted for commercial purposes without taking account of the complexities of deliveries and the space needs for HGVs and LCVs to carry out collections/deliveries in a timely and safe manner. For thriving urban centres more must be done to support the freight distribution and logistics sector to carry out their services in a safe manner and to co-exist with other road users.

Consideration should be given to the following:

- Permit and incentivise night deliveries by alternative fuelled vehicles including electric/CNG/LNG/Hydrogen vehicles, or EURO VI.
- Euro VI should be the minimum criteria for urban deliveries inside the M50 and similar ring roads around cities.
- Retailers should facilitate off-peak distribution/deliveries, thus alleviating traffic congestion and leading to safer distribution.
- More consideration and space needs to be provided for on-street deliveries. Planning must take account of the space needed for safe and efficient deliveries. The size of the vehicles required to service commercial buildings must be considered. This will reduce traffic congestion, improve safety, and reduce the levels of conflict between vulnerable road users and professional delivery personnel.

Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?

Rail freight can play a very important part in the economic functioning of Ireland. Over the years the number of live railway lines operating for day-to-day use has reduced. In line with EU transport policy promoting inter modal connectivity, Ireland must again consider rail as a viable option for freight. Of course, economies of scale play a defining role in ascertaining the viability of this mode for the freight distribution and logistics sector. Whilst planning for the future is recommended, we cannot shy away from the fact that the economic hubs in Ireland are in limited locations. In order to be viable, rail freight needs economies of scale. If the infrastructure is good enough the opportunities will present themselves to aid the growth in rail freight. What is certain is that significant investment in the rail network and infrastructure is a prerequisite to providing industry with the confidence that rail freight is a viable alternative to road transport.

- Feasibility of rail freight is the first challenge when considering how an increase in rail freight infrastructure or capacity could best benefit the haulage sector. An individual company must examine their entire supply chain and calculate current costs per tonne moved. The company must then look at any service level agreements with their customers, consider the location of depots and delivery points, and work out if there's a rail distribution hub within a reasonable distance of the customer base. This point alone highlights the fact that the opportunities for rail freight in Ireland are very limited. Focus therefore must be on developing the lines that can support future rail freight movements.



- Journeys above 300km (the distance between destinations considered necessary to make rail freight viable) are few and far between in Ireland, consequently prioritising industrial development adjacent to existing rail lines and sidings is prudent. However, even where rail transport is viable HGVs may still be needed for the final mile.
- Moving freight quickly out of ports into inland consolidation/distribution centres will improve efficiencies for distribution, reduce traffic congestion and improve air quality.

What are the barriers which prevent movement of freight by rail?

- Recent studies suggest there may be savings in moving part or full consignments by rail. Grants should be considered by Government to help offset the initial and subsequent costs of moving to non-road modes of transport.
- The advantage of transporting goods by road is that the haulier has greater control over the departure time and can calculate delivery times with a certain degree of accuracy. Timely deliveries of goods by rail will be impacted by the rail schedule, and the quality and reliability of the rail network.
- The geographical size of the country mitigates against the use of rail freight with, in general, a 300km of distance between stations considered necessary to make rail freight viable. Efforts to increase the use of rail freight should therefore be concentrated on routes that have significant freight movement requirements. A good example of this is the new twice-weekly rail freight service between Ballina (County Mayo) and the Port of Waterford.

What further action is needed to improve the hinterland connectivity of Ireland’s ports and airports, particularly in light of Brexit?

Inter Departmental / Inter agency synergies need to be developed as a part of a national logistics strategy. Ireland’s global competitiveness is reliant on a strong private sector supported by sensible Government policy. As an island nation we are reliant on our ports for our global connectivity. Air cargo, and particularly night flying, has numerous benefits including:

- Enables trading relationships.
- Makes Ireland a more attractive place to do business.
- Supports advanced logistics and supply chain functions.
- Enhances the ability of Irish based companies in providing the highest levels of customer care and after sales service.
- Increases consumer choice.

Dublin Airport is Ireland’s busiest cargo airport, handling 90% of the country’s air freight and 35% of all Ireland’s trade by value. Currently a new ‘North Runway’ is being constructed. When completed planning conditions will kick in that will reduce the allowable number of night-time flights to 65 runway movements. There is an ongoing process to review the planning conditions associated with the new runway, including the 65-movement cap.

Given the criticality of this period for air freight operations, FTAI made a submission to Fingal County Council calling for the exemption of all cargo flights from any night curfew, and the removal of the upper limit on night movements at the airport. Reducing the number of night flights at the same time as introducing a second runway is not conducive to supporting the economic recovery of Ireland and future proofing our reputation as a country that is ‘open for business’.



As an island on the periphery of Europe, we are reliant on effective and efficient multi-modal connectivity. Dedicated air freight integrators allow Irish businesses to send financial, legal or business documents, critical manufacturing components, perishable produce, urgent consumer goods and time critical medical and pharmaceutical products over night to arrive the next day. Express cargo services are about mission critical timeframes, fine margins, and speed. Downgrading the system at any point means that it will not work. If access to Ireland is constrained, Ireland and Dublin’s competitiveness will weaken as suboptimal service levels manifest themselves.

Brexit and Ireland’s geographic location mean that to remain competitive, links to global markets must be nurtured. As the first six months of 2021 are demonstrating, Brexit will redefine the Irish supply chain. As the gateway to Europe, Ireland will become a more attractive destination for international trade. The infrastructure is being developed to support this, but it must be utilised in a balanced manner. Movement of freight by air will become more popular, which, if supported, will drive and support the economic recovery. Traditionally the supply chain in Ireland has over relied on movement of goods by road and sea. Now that the UK is no longer part of the EU, the supply chain in Ireland needs to be supported in adapting to the new trading reality and to develop new connections to continental Europe and the world. Two of the main global air cargo hubs in Europe are Paris (Charles de Gaul) and Frankfurt, both over 1,000km from Dublin. Connectivity between these hubs is now more attractive than Heathrow in London. Night flights are central to supporting high value manufacturing exports where over 80% of the freight handled at night in 2018 was imports, with the early morning arrivals, mainly operated by express freight airlines, accounting for around 28,500 tonnes of goods moved.

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SUMMARY OF KEY POINTS

Topic	Question	FTAI Recommendations
<p>COVID-19</p>	<p>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?</p>	<ul style="list-style-type: none"> • Emergency response committees to include stakeholders from the freight distribution and logistics sector. • Better communication from agencies with responsibility and links to the supply chain is critical. • The complexity of the supply chain means that more education and training must be provided to ensure a better understanding for all stakeholders. • Consistent approach from all EU member states to support movement of goods. • Recognition that all in the freight distribution and logistics sector are essential workers.
	<p>Are there any suggestions for policy support to address the challenges that have been experienced as a result of the COVID-19 pandemic?</p>	<ul style="list-style-type: none"> • Create a sub-group of the Emergency Planning Government Task Force, with representation from the freight distribution and logistics sector. • The HSA / RSA should be more pro-active in engaging with key stakeholders to ensure consistency of messaging and should promote work related vehicle safety and driving for work compliance within the sector. • More flexibility to alleviating the expense associated with operating a commercial fleet. • State agencies charged with issuing motor tax or new vehicle registration / changed of ownership / operator licencing etc. must continue to be resourced and operate throughout the period.
<p>Brexit</p>	<p>What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?</p>	<ul style="list-style-type: none"> • further integration and upgrading of systems across Government Departments / agencies in order to reduce the administrative workload on the haulage sector. • remove the requirement for entry and exit safety and security declarations. • Develop strong maritime links closer to key European Strategic locations (France/Netherlands/Belgium) is sensible and should be supported by Government policy. • Enhance supports for HCV drivers including facilities for hauliers at ports. • Guidance needs to be developed for Authorised Economic Operators (AEO). • Unaccompanied trailers safety and security declarations should be the responsibility of the carrier (the shipping company). • Sufficient resources should be provided at Irish Ports for parking, road accessibility and departure and arrival times of ferries should be coordinated to minimise the impact on traffic congestion. • Synergies between the state agencies assigned with responsibility for customs. Sanitary and Phytosanitary checks, immigration and other regulatory controls need to be developed through IT systems.



	<p>What is needed to incentivise less polluting Light Commercial Vehicles?</p>	<ul style="list-style-type: none"> • Further toll charge reduction incentives • Funding for suppliers of chargers and alternative fuel facilities to ensure a well-maintained infrastructure. • Home chargers to be included for those operating company electric vehicles. • Grants for commercial chargers for leased vans not just owned vehicles. • Price of alternatives need to be comparable to diesel. <ul style="list-style-type: none"> • More places to fuel/recharge • Commercial SEAI grants at least matching private grants for Commercial vans. 3,800 vs 5,000 • Access to fast chargers e.g., longer cables on existing chargers. • Clarity should be provided on how the electricity that is used to recharge vehicles is produced (how much through wind energy) • More details and guidance should be provided on how and where batteries are sourced.
	<p>Should eco-driver training be rolled out further, for example, as part of Driver CPC training?</p>	<ul style="list-style-type: none"> • Define Eco driving in a manner that delivers results from a blended approach that includes in-cab training, classroom <ul style="list-style-type: none"> • Transport Manager CPC programme should be overhauled to reflect the technology and tools that future drivers and transport managers will be dealing with in the next 10-20 years • Driver training should not only be encouraged through the driver cpc module but also supported through the development of a code of practice for safe fleet operations, to include guidance regarding risk assessments and training for drivers similar to the driving for work programme
	<p>Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?</p>	<ul style="list-style-type: none"> • Authorities for Ireland’s main urban centres need to review their freight distribution movement plan and to develop a more freight friendly strategy that takes account of the environment, traffic congestion, local residents, vulnerable road users and the distributors themselves • different solutions for different sectors of industry, some of whom are already do a high degree of consolidation as it is the basis of their business. • For express parcel sector the following should be considered: <ul style="list-style-type: none"> ○ consolidation could drive inefficiencies through additional journeys, double handling of packages, vehicles dropping off volume and then traveling back empty. ○ Data protection – who owns the customer data? Customer data cannot be shared easily/legally.



		<ul style="list-style-type: none"> ○ Who deals with the customer service issue on the final mile in case of loss, damage, delayed deliveries? ● Micro consolidation sites within city centres do have value and should be explored. This offers the opportunity to deliver to designated hubs with perhaps double trailers where one is dropped in one location and one in another.
	<p>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.</p>	<ul style="list-style-type: none"> ● Prioritise and encourage double length trailer usage. ● To ensure a vibrant and competitive marketplace it is very important that the increase in carbon tax and the cost of diesel does not compromise SMEs and those operating diesel-powered business who have no alternatives due to prohibitive costs of the new technology, the lack of availability of the technology or where the infrastructure has not been developed to support the new fuelling technologies. ● Another key challenge faced with expanding electric fleet is not having enough grid capacity to charge these vehicles simultaneously at peak times in the evening. ● Allow more efficient delivery opportunities outside peak hours. Trucks are getting quieter every year with silent electric trucks due from 2025. Take this into account when planning urban delivery rules. ● Make narrow delivery time windows wider to allow trucks to cope with the unusual traffic patterns to come. ● Capital support to de-risk service station supply of alternative fuels for electric / CNG / LNG etc. ● Confirm lowest rate of tax will be for Euro VI / 6d where Adblue is being used and not by-passed; implement now to stop imports of dirty Euro I-V commercial vehicles from UK. ● Incentivise Euro VI & CNG vehicles with reduced road tolls and clarity (Euro VI) on LEZs – trucks bought today will be on fleet for next 4-5 years and on-road for 10-12 years! ● The current rate of excise applied to natural gas for transport use be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 30% of the HGVs and Buses national fleet. <ul style="list-style-type: none"> ● Last mile delivery. Support cargo bikes. <ul style="list-style-type: none"> ○ Congestion charges in urban areas <ul style="list-style-type: none"> ● Barrier free tolling ● Smart Motorways – betting traffic Management, particularly in Urban centres ● Encourage holistic approach to carbon transition by providing necessary education and training to develop competencies. <ul style="list-style-type: none"> ● Support Biomethane production ● Develop education and training modules within all training and education programmes for the transport and logistics sector as well as for trade apprenticeship such as mechanical engineer.



		<ul style="list-style-type: none"> •
<p style="text-align: center;">Road Safety</p>	<p>What are the road safety priorities in road haulage for the next 10 years?</p>	<ul style="list-style-type: none"> • Create more awareness around the implications of poor driving behaviour. • Authorities charged with regulating the industry must be sufficiently resourced. • Powers to immobilise vehicles where there is issues with cabotage , roadworthiness or tachograph. • Review must take place in Ireland of the powers afforded to the RSA inspectors.. <ul style="list-style-type: none"> • Smart Card – one card to contain all licencing information and driver qualifications/certification. • Electronic Roadworthiness Cert for trailers • Adopt Driver CPC training programme to allow CPD (Continuing Professional Development) that would recognise specialised certified training. • New road safety campaigns and guidance should be developed to promote the effective and safe driving practices and utilisation of the new technologies. • Develop more engagement with commercial fleet operators to ensure road safety messages are aligned and filtered down to all organisations. • Graduated Fixed Penalties should be introduced. • Review the CVORI and publish annual findings in relation to the state of compliance of commercial vehicles, including the key roadworthiness issues. • The level of enforcement must be such as to act as an incentive to non-compliant operators to either change their ways or stop operating. • Carry out a media campaigns on the correct use of lighting for vehicles to include flashing amber. • The RSA should develop stronger links with industry through consistent engagement with trade associations and collaborative outreach programmes. • Milk collection operations should come in under the tachograph regulations as this service is predominately carried out by the licenced haulage sector. • Promotional activities surrounding medical fitness to drive including good eating habits and the links with improved road safety should be developed for the haulage sector.
	<p>How are these priorities best addressed?</p>	<ul style="list-style-type: none"> • Industry review of the Driver CPC training regime. Examine and explore CPD opportunities and develop consensus for change. • Specific actions should be developed with clear allocation of responsibility. • A cost benefit analysis should form part of a prioritisation and assessment of actions under the Strategy.



		<ul style="list-style-type: none"> Necessary provision of resources for the RSA and An Garda Síochána RSA to appoint a liaison for the freight distribution and haulage sector.
	What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?	<ul style="list-style-type: none"> Regular engagement with stakeholder that are willing to work with the authority. The CVORI needs to be re-invigorated to establish trust within the industry that it is a scale of compliance and something that should form part of all conscientious operator's operation compliance targets.
	What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?	<ul style="list-style-type: none"> Consolidation of Legislation The RSA, HSA and other stakeholders should work collaboratively with the haulage sector to provide sector specific road safety education campaigns
Mobility Package	What are your views on how Ireland implements the Mobility Package changes?	<ul style="list-style-type: none"> Support the establishment of a 'body' with overarching responsibility for commercial transport operations. Authorities responsible for regulation and enforcement must provide regular updates to industry on the new requirements to ensure all have the ability and means to be compliant. It is important that authorities in Ireland do not create an unfair environment for Irish business by not implementing elements of the Package that are rigorously enforced in other Member States. The Department of Transport is currently responsible for operator licencing in Ireland. Will Van licencing sit in this Department?
	What are your views on the return of the truck?	<ul style="list-style-type: none"> As the Ireland being an island state FTAI seek consideration for compensation for the increased costs of connectivity with continental Europe and or a derogation seeking an exemption from the requirement to return to Ireland within 8 weeks
Road Infrastructure	Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?	<ul style="list-style-type: none"> Consideration must be given to our key strategic ports and the facilities available to drivers. fair, proportionate and consistent enforcement is critical to the sustainable implementation of compliant operations and drives a culture that recognises the legislation and the regulations as underpinning a fair, competitive safer environment for all.
	What more is needed in relation to road user charging for freight transport in Ireland?	<ul style="list-style-type: none"> Clear guidelines need to be developed advising industry of the plans for future road user charging for freight transport. A common approach to road charging to provide a benefit to the industry overall, against the increase in costs as a result of charging and tolling. FTAI would like to see the money collected to provide better infrastructure within certain constraints.

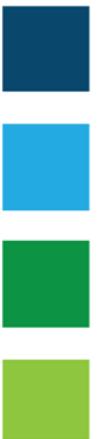


		<ul style="list-style-type: none"> • The current reduction in Toll rates for users of 'Alternative Fuels' should continue.
<p style="text-align: center;">Labour Market/ Skills</p>	<p>How can more people be encouraged to take up work in the road haulage sector, <i>e.g.</i>, as HGV drivers, Transport Managers, customs roles, <i>etc.</i>? Please provide concrete suggestions/best practice examples.</p>	<ul style="list-style-type: none"> • Key to attracting people into the sector is making it easy for people to understand the available roles and the career progression opportunities linked with the haulage sector • Link qualifications on the National Framework of Qualifications (NFQ) with the profession of professional driving • Better and more consistent enforcement of non-compliant operators • Support better succession planning through guidance and supports. • Consignor Liability - Raise awareness by contractors of haulage services of their legal obligations. Guidance should be developed to support consignors' understanding of their legal obligations when procuring third party haulage services. (this can be included in the proposed Code of Practice for the haulage sector) • The freight distribution and logistics sector (including the haulage sector) must become more active in encouraging and promoting gender diversity within the industry.
	<p>How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?</p>	<ul style="list-style-type: none"> • Developing a consistent and sustainable outreach to secondary schools and further education providers is important in highlighting the diversity of roles and opportunities that exist in the freight distribution and logistics sector including the haulage sector. • More support is required for the establishment of training programmes and apprenticeships that support the haulage sector



Ten-year Strategy for the Haulage Sector – First Consultation Document

Galway Harbour Company
Submission to the Public Consultation



PROJECT NAME Ten-year Strategy for the Haulage Sector – First Consultation Document

REPORT NAME Submission to Public Consultation

Document Control Sheet	
Document Reference	SHS
Report Status	Submission to Public Consultation
Report Date	June 2021
Current Revision	A
Client:	Port of Galway / Galway Harbour Company
Client Address:	Harbour Office, New Docks, Galway
Project Number	7476

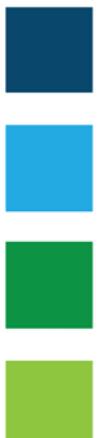
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Revision	Description	Author:	Date	Reviewed By:	Date	Authorised by:	Date
D01	Draft for Client	JOF	10/6/2021	BR	11/06/21	BH	14/06/21

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1.0 GALWAY HARBOUR COMPANY

We act as Consulting Engineers for the Port of Galway / Galway Harbour Company (“GHC”), and we wish to make this submission on their behalf to the Ten-year Strategy for the Haulage Sector.

This consultation is the Department of Transport’s call for suggestions as to how to generate efficiencies and improve standards in the haulage sector to assist it in transitioning to a low-carbon sector. The consultation is seeking views on what measures are needed to deliver on these objectives.

GHC wishes to contribute to this consultation and propose measures that align with the objectives of this haulage strategy and the broader objectives of Project Ireland 2040.

GHC is a critical element of the transportation network serving Galway City, County, and the Western Region. GHC provides for sustainable transport of product to and from the entire Region. It is currently used by various businesses for the importation of wind energy components, petroleum products, bitumen, steel, timber *etc.* and the exportation of scrap steel, RDF, limestone *etc.*

To assist in meeting Ireland’s commitments to the *Climate Action Plan* and the required transition to low carbon and renewable energy sources, GHC expects to play an important role in helping Ireland meet the targets as laid out in the Climate Action Plan, namely:

- 70% renewable electricity;
- 30% reduction in CO2 emissions; and
- 32.5% improvement in energy efficiency.

We believe that the future vision for GHC is aligned with the National Strategic Outcomes in Project Ireland 2040.

2.0 GALWAY HARBOUR COMPANY’S VISION

GHC’s vision proposes the relocation and extension of the existing Port. The proposed new Port will be a modern sustainable facility; well connected to Europe and beyond and with excellent connections to modern rail and motorway links. The development of the new Port will also accommodate a new and exciting opportunity for the development of the inner harbour lands into a mixed-use urban quarter within easy walking distance of the city centre.

2.1 Galway Harbour Port Extension

This part of the vision incorporates the upgrade of the current Port facilities by relocating and extending the Port, developing new commercial quays and a deep-water docking facility, a marina and fishing pier. This will improve access to the Port and overcome the current restrictions such as the existing gate width and channel depth, limited access due to tidal constraints, limited berths within the harbour along with limited serviced land to facilitate Port operations.

The removal of these restrictions will provide a much-improved service to GHC's customers and businesses in the region. The Galway Harbour Extension development is at an advanced stage of the planning process and will provide the following:

- 660m of quay berth to –14.9m Ordnance Datum (“O.D”);
- Port development serviced by a channel to -10.9m O.D;
- A 400m turning circle to -10.9m O.D;
- 28.07 ha of land development which will include yardage;
- 660m of sheltered quays;
- Western Marina with 216 No. berths;
- Fishing Pier;
- Nautical Centre Slipway;
- Freight rail link to enable freight and cargo to be efficiently transported to and from the harbour to allow positive road traffic and environmental benefits.

GHC has welcomed the completion of a Statement of Case by An Bord Pleanála for consideration by the Minister for Housing, Local Government and Heritage in respect of the Port's Strategic Infrastructure Development (“SID”) application in relation to the proposed Galway Harbour Extension project. An Bord Pleanála stated that “The Board is of the view that the proposed development as part of this application should be given consent for imperative reasons of overriding public interest (IROPI)”.

In setting out the imperative reasons of overriding public interest, An Bord Pleanála also noted the following:

- The Board concluded that the proposal presents an integrated development that enhances the social, economic and recreational benefits of the Port for the wider benefit of the population of Galway and its regional hinterland.
- The enhancement of port facilities also aligns with the European transportation policy promoting ‘short-sea shipping’ as a cost effective and environmentally sustainable alternative to road transport. The enhancement of the Port serving the region will therefore align with European, national and regional policies in favour of balanced spatial and economic development.

An Bord Pleanála has requested that the Minister for Housing, Local Government and Heritage consider the adequacy of the compensatory measures proposed by the applicant and to advise as to whether there are imperative reasons of overriding public interest to enable consideration of the proposed development to proceed. The layout of the proposed Galway Harbour Extension is shown on Figure 1.

The SID planning website with full details of the proposed development is as follows:

www.galwayharbourextension.com



Figure No. 1

2.2 Galway Inner Harbour Development

The other part of GHC's overall vision proposes a significant, new, urban quarter adjacent to Galway City centre. It will provide residential, office, leisure, cultural, local services and public realm within easy reach of public transport hubs. Extensive waterfront recreation areas and the continuation of the South Park waterfront 'greenway' are all provided for within a stone's throw of the city centre, providing a natural expansion of the city onto existing Harbour lands and the waterfront.

Central to the vision is a transformative public realm strategy which pledges to provide the people of Galway a renewed sense of place by delivering approximately 22,300 square metres (5.5 acres) of new public spaces for the city and repurposing the Inner Dock basin for marine recreation. Proposed public amenities include the development of cross-city walking and cycle routes, multi-purpose cultural and event spaces, recreational water sport facilities and a completely reimagined permeable city street network that encourages natural orientation and wayfinding along the waterfront.

Images of the Vision proposed for the lands are shown on Figures 2 and 3. GHC has recently concluded a non-statutory public consultation process following the launch of the Vision to the public. This vision for the lands be accessed at the following website:

www.galway-harbour.com

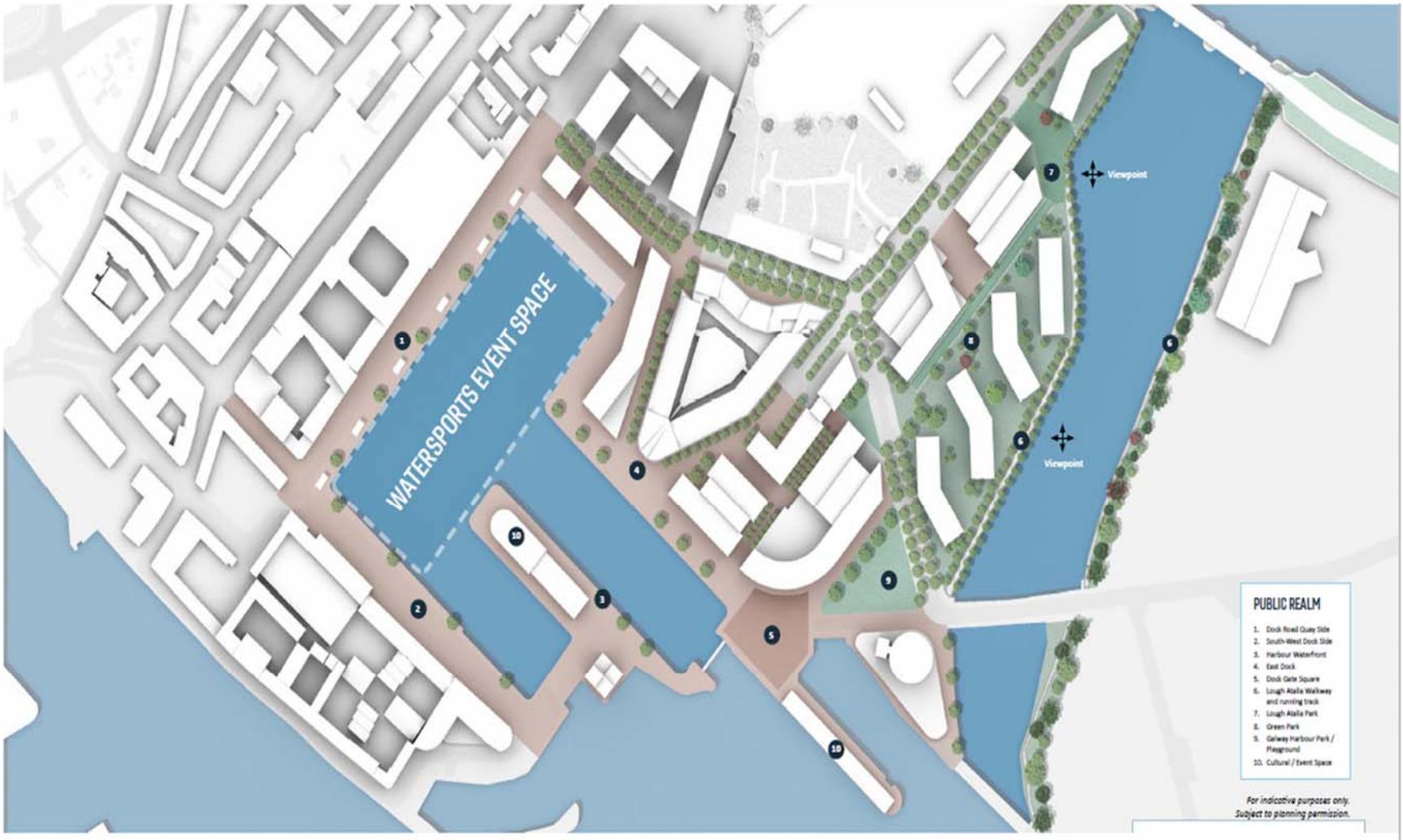


Figure No. 2



Figure No. 3

2.3 National Strategic Outcomes

GHC's vision supports several of the National Strategic Outcomes which form a central part of Project Ireland 2040:

- **Compact Growth** - High density residential, employment and social amenities within a short walk of Galway City Centre.
- **Enhanced Regional Accessibility** - Increased accessibility to the Port for larger ships with excellent motorway and train linkages to the rest of the country.
- **Strengthened Rural Economies and Communities** - Increased tourism opportunities within easy reach of the Wild Atlantic Way.
- **Sustainable Mobility**
 - Excellent bus and rail connections, within walking distance to the city centre.
 - Linkages to existing and proposed cycle facilities, which will improve walking and cycling routes for the benefit of city residents, commuters and visitors.
 - An opportunity for intramodality by linking walking and cycling routes with public transport.
- **High-Quality International Connectivity** - The new Port offers the opportunity for larger ships to use the Port which provides for alignment with European transportation policy and promotion of 'short-sea shipping' as a cost-effective and environmentally sustainable alternative to road transport.
- **Transition to a Low Carbon and Climate Resilient Society** - The Atlantic Ocean provides a world class wind resource just off Ireland's West Coast. The development of this resource represents a "once in a generation" opportunity, both in terms of addressing the threat posed by climate change and regional economic development. An expanded and relocated Port of Galway is well positioned to play an important role in the development and service of this natural resource.

2.4 Vision Alignment with the Strategy for the Haulage Sector

The vision for the development of the Port of Galway and the development of the inner harbour lands will form a central part of any haulage strategy for the western region:

- **Decarbonisation** – The new Port will offer access opportunities for the movement of freight from Europe that is currently delivered by road. This will reduce the carbon footprint of this freight dramatically.
- **Safety and Efficiency** – The new opportunities for freight transport by sea has knock on effects on the road network in terms of increased safety and efficiency. It also reduces the maintenance requirements of the road network.
- **Urban Area Transport Planning Strategy** – GHC’s proposed development incorporates sustainable urban planning with a new Port which delivers international goods to within a stone’s throw of Galway City Centre.
- **Multimodality** – The proposed development includes a freight rail link to enable freight and cargo to be efficiently transported to and from the harbour. The Port has also excellent connections to the M17/M18 motorway for servicing the Western Region.
- **Investment to ensure rail freight connectivity** – The freight rail link is of critical importance to the Port development. The plan incorporates this link as an integral part of the proposed development.
- **Strengthen surface connectivity to Ports and Airports** - The connection of the relocated and expanded Port of Galway to the existing rail network will add value to the existing rail stock in so far as it creates an opportunity for the transit of goods by rail.
- **Regional Connectivity** - The proposed Port extension will lead to enhanced international connectivity to the entire Western Region. A deep-water port opens enormous opportunities for green energy infrastructure, access to the West of Ireland for the importation and exportation of goods and for tourism.
- **Improving Connectivity of the North and West to State Airports and Ports** - Given the proposed direct connections to high quality motorway and rail infrastructure, the new Port can become a hub around which economic growth can spread into the region. The importance of a major Port on the West Coast with connectivity to mainland Europe is underlined by the renewable energy opportunity, requirements for additional transport links following Brexit and the need to grow alternative trade links.

The proposed Strategy for Haulage Transport sets out to align itself with the European Commission’s Sustainable and Smart Mobility Strategy (December 2020). GHC also supports this strategy, and the development of the new Port will contribute significantly to several of its goals including:

- Sustainable alternatives to road transport;
- Multimodality;
- Short-Sea Shipping;
- Sustainable urban mobility planning incorporating the freight dimension.

3.0 PUBLIC CONSULTATION SUBMISSION

GHC is making this submission to the Ten-year Strategy for the Haulage Sector to highlight the following:

- The vision for both the Harbour Extension and the development of the Inner Harbour aligns with national policy, including the ‘National Planning Framework: Ireland 2040 Our Plan’ and the ‘Climate Action Plan 2019’;
- It also aligns with Regional and Local Policy in terms of the ‘2020 Regional Spatial and Economic Strategy for the Northern and Western Region’ (including the Galway Metropolitan Area Strategic Plan) and the Galway City Development Plan;
- Subject to the appropriate planning approvals, the vision will transform this part of Galway City and generate enormous economic benefits for the West of Ireland;
- The vision will provide an opportunity to transform freight transport to the West of Ireland. It provides an opportunity for the transition to more sustainable transport modes which generate benefits in terms of Economy, Safety, Environment and Accessibility;
- The Galway Harbour Project represent a “once-in-a generation” opportunity to develop a multimodal mobility and transport hub linking all the relevant modes;
- Haulage access routes need careful design to enable renewable onshore wind projects unrestricted access from Ports to the road network.

GHC wishes to continue its excellent relationship with the Department of Transport and Galway City Council and is aligning its vision with the national and local policies espoused by each. The proposed development of the Galway Harbour Extension and the development of the lands in the existing Inner Harbour align with critical national policies and, accordingly, GHC wishes to be recognised in the Ten-year Strategy for the Haulage Sector in Ireland as an important stakeholder in the freight transport sector in Ireland and hereby requests the necessary supports to realise their vision for the development of both the new Port and the inner dock lands.

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Consultation on the Ten-Year Strategy for the Haulage Sector

Gas Networks Ireland Response

16th July 2021



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Introduction

Gas Networks Ireland welcomes the opportunity to respond to the Department of Transport's public consultation on the Ten-Year Strategy for the Haulage Sector.

Gas Networks Ireland is a wholly owned subsidiary of Ervia and was established in accordance with the Gas Regulation Act 2013, as amended. It owns and operates the natural gas transmission and distribution networks in Ireland. Gas Networks Ireland builds, develops and operates Ireland's world-class gas infrastructure, maintaining over 14,500 km of gas pipelines and two sub-sea interconnectors. The gas network can be considered a critical entity as it transports gas through the network on behalf of over 700,000 customers made up of the following sectors, Power Generation, Industrial and Commercial, Residential and Transport.

Consultation Questions

Gas Networks Ireland has reviewed the consultation document and focused this response on the section entitled 'Making Road Freight Transport Cleaner: Environmental Regulation, Sustainability and Decarbonisation' and on the following two 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?*

As outlined in this section of the consultation document, decarbonising the road haulage sector is a significant challenge as Heavy Duty Vehicles (HDVs) accounted for 19% of Ireland's total land transport emissions in 2019 and in the EU, account for approximately 25% of all EU road transport emissions. In view of this and given the ambitious targets in relation to transport emissions reduction, HDVs have an important and immediate role to play in the decarbonisation of the road transport sector.

The solutions to make road freight transport cleaner necessitates the successful deployment of many new technologies and Gas Networks Ireland has already begun to invest in such technologies, both to facilitate renewable gas injection into the gas network, and to supply Compressed Natural Gas (CNG) from the gas network as a transport fuel source. Having successfully injected renewable gas into the gas network for the first time during 2019, the dedicated renewable gas entry point in Cush became fully operational in May 2020 and joined Corrib as an indigenous gas source on Ireland's gas network. An initial network of fast-fill CNG stations is currently being rolled out by Gas Networks Ireland in conjunction with leading forecourt and road haulage fleet operators. There are now seven CNG stations operational in Ireland, three medium private stations and four public access stations, which form a key part of the developing national CNG network. One further station is constructed and scheduled to be operational in 2021, with an additional nine CNG stations currently being progressed through the design and planning project phases.

While the adoption of hydrogen for heavy duty transport represents a longer-term solution and given that electrical solutions are not appropriate for heavy duty vehicles, CNG represents the only suitable and immediately available decarbonised alternative transport fuel for heavy goods vehicles in Ireland. CNG is increasingly offered as bio-CNG which is where varying percentages of biomethane are added to the gas mix, thereby, further increasing the potential for CO₂ reduction. Gas in transport can be fully renewable when 100% biomethane is used, accelerating the decarbonisation of heavy-duty vehicles with carbon-neutral mobility.

What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

A suite of measures could be employed to encourage the up-take and usage of low emission vehicles:

1. Develop a policy and regulatory roadmap to ensure HGVs in the transport sector decarbonise by 2030

In order to create a supportive environment to decarbonise HGVs, a policy and regulatory roadmap is required. A policy roadmap outlining policy supports up to 2030 would provide HGV owners and infrastructure providers with certainty, which would, in turn, help to accelerate take-up of alternative transport technologies by facilitating the planning of vehicle purchase decision cycles. While policy measures such as reduced excise duty for natural gas and biomethane as a transport fuel address the key issue of price disparity between CNG and conventional fuels, certainty in terms of the duration of this measure is urgently required. The lifespan of HGVs is generally eight years and therefore, if fleet operators or hauliers are purchasing CNG vehicles in 2021 they may only be able to avail of the current excise duty for one year, thereby, acting as a disincentive to the switch to CNG. An extension of the excise duty treatment beyond 2022 would provide the required certainty to CNG users to facilitate vehicle purchase decision cycles.

In addition, certainty regarding the duration of the following policy supports would further promote and normalise the use of non-conventional fuels and technologies such as CNG and renewable gas in transport:

- Extend the duration of the Fuel Excise Duty treatment for gas in transport to 2030 – a fixed fuel duty price has been introduced in the UK to 2032;
- Extend the duration of the Accelerated Capital Allowance scheme beyond December 2021;
- Extend the duration of the Low Emissions Vehicles Toll Incentive scheme by two years;
- Introduce infrastructure supports, such as capital grants, to encourage wider and quicker roll out of low emissions refuelling infrastructure within HGV transport.

A roadmap covering the time period up to 2030 corresponds with the timeline set in the “National Policy Framework – Alternative Fuels Infrastructure for Transport in Ireland” to

ensure that Ireland has the required level of recharging and refuelling infrastructure to support the uptake of alternative fuels usage, including CNG, by 2030.

2. Implement an HGV Scrappage Scheme

The national HGV fleet is ageing, with vehicles 10 years or older now accounting for 45 per cent of all HGVs. Such an aged HGV fleet represents a particular opportunity to accelerate the take-up of alternative transport technologies. The replacement of HGVs at the end of their service with cleaner alternatives could have a significant impact on reducing freight emissions. If this transition to lower emissions vehicles does not occur, there is a considerable risk of 'locking-in' a large cohort of HGVs to diesel for the next decade. A scrappage scheme could be introduced as part of the next low emission vehicle grant scheme to cover the scrappage of diesel HGVs and support their conversion to low emission vehicles such as CNG or hydrogen fuelled HGVs. A scrappage scheme for older diesel HGVs would result in a significant reduction in transport emissions and contribute to an improvement in air quality if they switched to CNG vehicles as part of the scheme.

3. Motor tax amendments

While the basis for assessing Motor Tax for cars has been aligned with their CO2 emissions since 2008, the motor taxation of vehicles other than cars is based upon unladen weight. However, there is scope to change the motor tax system for HGVs to a dual approach based upon weight and emissions, using Diesel Euro VI as the required emissions standard, with the expectation of further accelerating the move to alternative transport technologies.

4. Planning policy change to facilitate the rollout of refuelling infrastructure

A key element of driving the uptake of gas in transport is the availability of refuelling infrastructure. One factor that could slow the rollout of CNG refuelling infrastructure is any delay to the planning process for CNG stations. A planning policy exemption specific to CNG refuelling stations would help to accelerate the roll out of this infrastructure and enable a faster rate of decarbonisation for the haulage sector.

What is needed to incentivise less polluting Light Commercial Vehicles?

GNI believes that many of the policy supports required to incentivise the adoption of less polluting Light Commercial Vehicles (LCVs) are similar to those faced by the HGV sector. LCVs would also benefit from a wider adoption of solutions such as CNG and therefore, consideration should be given to the issues highlighted in the above response. In particular, the development of a similar policy roadmap to that for HGVs is required to ensure LCVs make a corresponding contribution to transport decarbonisation over the period to 2030.

Conclusion

Gas Networks Ireland would welcome the opportunity to discuss this response in more detail with the Department of Transport, particularly if there are any questions or clarifications required.

Good Morning I would like to make the following recommendations in relation to the 10 year Haulage strategy

Driver Training & Recruitment

We are finding it extremely difficult to attract young HGV drivers, this is not helped by the costs associated with obtaining a HGV Licence.

Insurance costs for young HGV drivers make it almost impossible for Transport companies to employ them until they are 23

We are losing those between 18 – 23 to other careers who had an interest in a job in transport.

The issue of recruiting from outside the EU needs to be addressed. Hauliers are finding the work permit system too cumbersome.

The driver hours need to be addressed so that drivers who may have worked their daily allowance & may be ½ hour from their home are permitted to travel that extra distance with no penalties.

Gas Powered Trucks

If we are to start to move from diesel there needs to be more facilities for alternatives made available. Here in Co. Longford for example a gas line was brought into Centre Parks. This needs to be extended to give hauliers in areas like this the option to change to gas driven vehicles

Costs making uncompetitive

Ireland is heavily dependent on the road network to move goods, so there needs to be further supports in place or tax reductions on diesel for hauliers when fuel costs spiral out of control.

The Farming & Forest industry in Ireland need a road network that can handle HGVs to move produce, so upgrading of the rural road network is essential.

Roadside Facilities

Welfare facilities are not common for HGV drivers in Ireland, because of the driving hours restrictions in place drivers need to sleep out in their trucks, Thought must be given to the provision of shower facilities in all fuel stops. Also I would add that the haulage companies also should all provide such facilities.

Investment in smaller Ports

The smaller ports in Ireland are key for a lot of business & help keep HGV traffic out of our major hubs. Investment should be made into our smaller ports to give more options to Exporters & Importers.

Promotion of the Haulage Industry

There needs to be a TV campaign to help promote the image of the transport industry & the key role it has In Ireland, trucks are often seen as a nuisance on our roads & in out towns & villages.

This would in turn help attract more drivers into the trade



Regards,

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HMI Response to the Department of Transport Public Consultation on Ten-year Strategy for the Haulage Sector – June 2021

Executive Summary:

- Zero emissions HGV vehicles are necessary to deliver required emissions reductions
- ZEV Vehicles that can cope with logistics requirements of haulage sector are needed
- Hydrogen fuel cell technology is a mature technology now being manufactured by the majority of truck companies.
- Hydrogen fuelled vehicles are available to the Irish market, provided we can order early, via Hyundai, Hyzon, Volvo, Daimler, etc
- The hydrogen fuel is available to fuel HDVs from multiple partners e.g BOC, ESB, ENERGIA, etc, as evidenced by the recent hydrogen bus trial
- The deployment of a basic national network of refuelling stations is the key issue.
- 20 to 30 refuelling stations (depending on strategic decision on level of coverage) would supply green renewable hydrogen for all haulage transport needs on the island of Ireland – and indeed an all-island approach would be hugely beneficial.
- A framework national network would allow demand for green hydrogen to kick-start the hydrogen economy on the island of Ireland.
- The most significant contribution that Ireland can now make to bring effective decarbonisation of the Transport Sector forward, is to fast-track the creation of the ‘backbone’ of a Hydrogen Refuelling network, supported by public sector commitment and funding. This will unlock significant private sector investment in the urgent roll-out of what will be a vital and strategic piece of national infrastructure, as the world continues to focus decarbonisation efforts on the creation and integration of vast amounts of renewable energy.
- Experience gained in the roll-out of the Causeway Project¹ underline the necessity of establishing a basic refuelling infrastructure prior to vehicle uptake and the likely timescale required to deliver on this.

Q What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

Background Issues

- While seeking to reduce emissions through more efficient newer diesel vehicles and better, more careful planning and driving on the roads in the interim, it is hard to see how anything close to the required level of emissions savings can be achieved without seeking to replace some of the most polluting vehicles on the road with Zero Emitting Vehicles.

¹ <https://www.gasnetworks.ie/business/natural-gas-in-transport/the-causeway-project/>

- If this is to make any real contribution before 2030, decisions need to be taken now as lead-in times will require a number of years before such vehicles would then start arriving for use on the road in Ireland.
- The new challenge of being effectively the only (and small) Right-hand Drive (RHD) market in the EU may limit our access to RHD ZEVs (which may in future be produced with UK rather than the EU Approval Requirements in mind) unless we are active in seeking specific numbers of specific types of vehicles that we need, a number of years in advance of production and delivery.
- One solution does not fit all, in the cost and time conscious world of commercial collection and delivery there is a need to provide choice in order to support decarbonisation
- Journeys undertaken by HDV Work Vehicles are not the same as discretionary/leisure driving in a car; while in many cases BEVs may work, in other cases and particularly the heavier vehicles travelling longer distances Hydrogen Fuel Cell EVs provide a more realistic alternative to diesel.

What is Required

- State supports for the acquisition of both Battery Electric and Hydrogen Fuel Cell Heavy Goods Vehicles and for the recharging/refuelling infrastructure are crucial,
- HGV Operators do not have the freedom to choose to shift to Zero Emitting Vehicles (ZEV) by themselves; as the cost of such vehicles is higher, they cannot make that change without their client customers seeing a benefit rather than an unwelcome cost increase. A key to driving the transition to ZEV is to look at incentivising or where appropriate penalising those client companies (on behalf of whose companies the transport emissions are produced) in relation to the carbon footprint of their business's transport logistics.
- A specific targeted Hydrogen Transport project aimed at replacing some of the highest emitting vehicles with ZEV would deliver an early reduction in CO₂, support early producers of Hydrogen from renewable energy, provide infrastructure to support further ZEV vehicles, support an all island approach to decarbonisation and act as catalyst to encourage other transport users to start the transition to Zero Emissions.
- Used imported vehicles are an important component in the current supply of HGV vehicles into the Irish market but we are increasingly adding higher numbers of more polluting older trucks that may be less attractive to keep in their home market. Unless we work to ensure that any vehicles (new or used) entering the fleet are an improvement in emissions terms, we are likely to see little or no progress in terms of CO₂ and other harmful emissions between now and 2030.

Q What is needed to incentivise less polluting Light Commercial Vehicles?

- See the issues raised above which apply also to Light Commercial Vehicles.
- In the case of Light Commercial Vehicles while it is likely that Battery Electric Vehicles will be the obvious solution of choice for perhaps the largest number of operators, again the longer distance vehicles and those with higher energy demand such as refrigeration, are likely to need the choice of Hydrogen Fuel Cell Vehicles if they are to make the transition to zero emissions.

Some Key Considerations

Rather than relying on large overall targets and strong encouragement to deliver a 51% reduction in emissions by 2030, a strategy for delivering the reduction is required, identifying numbers of specific types of vehicles (among other things) and how and when these can be added into the fleet over the period ahead. As in business budgeting, if we need 51% reduction in emissions from Transport by 2030, what can we do to deliver a 5% saving in 2022, and after that what can we do in 2023? Of course it is possible, even likely, that bigger savings will be made toward the end of the period but without seeking delivery of a real and specific contribution each year from planned sources, we could end up with an unassailable target of 40% to achieve in the last two years.

The key message is that we must start now, with specific targeted actions designed to deliver calculated savings, at a known cost each year between now and 2030, if any significant progress is to be made in this Sector toward meeting the targets set out in the proposed Climate Bill. While targets need to be annual, it is likely that those actions that will deliver the largest reductions in emissions will require decisions to be taken some years before delivery of the savings, so again decisions need to be taken early if we are to see significant benefits before 2030.

As Transport & Environment (T&E) have underlined, **carbon emissions from Heavy Duty Vehicles are too big to ignore, being responsible over 19% of Ireland's total land transport emissions in 2019**. While progress is being made in respect of ZEV Light vehicles and there is a clear path to seeking the required 51% reduction. There is no such path in place in respect of the 19% represented by HDV², which includes Ireland's share of the *5% of vehicles on EU roads that are responsible for approximately 25% of all EU road transport emissions*".

Decarbonising HDVs requires a specific HDV solution that is suitable for the Sector and can sustain the future development of the Economy. Hoping that a solution that fits the needs of car users, who can avoid discretionary long journeys or enjoy the mid-journey break

² HDV is the Term used in most European references to Heavy Vehicles and can be used to cover both Trucks and Buses/Coaches, while in Ireland the term HGV is used most often and while it can be used in reference to Trucks it can also cover Buses/Coaches as well, as in the Road Safety Authority CVRT Vehicle Testing Regime. While it is not entirely satisfactory to have to switch between HDV and HGV here, it has been done, as far as possible, on the basis of the reference being used.

when they need to recharge, is not a solution focused on the needs of a sector that is crucial to our future economic wellbeing.

At the same time the environmental cost of not developing and supporting the delivery of such a focused solution will be a continuation of carbon emitting heavy vehicles well beyond 2030 and a failure to meet targets unless the shortfall is to be delivered from the Light Vehicles who currently produce 81% of the emissions. It would likely require a reduction of up to 62.5% of Light Vehicle emissions, if the Transport Sector were to remain on target to achieve an overall 50% reduction by 2030, if that level of reduction cannot be delivered in the Heavy Duty Vehicle emissions.

As T&E have said; *It is inconceivable that the EU's 2030 Effort Sharing Decision targets, let alone the EU's 2050 targets, can be achieved without tackling the heavy-duty sector. However, to date there has been no credible EU strategy to help member states curb truck and bus emissions*³. Ireland is not unique in not having such a strategy but we need to act now, given the lead-in times that operate, if the Sector is to commence the required transition to Zero Emissions in time to deliver a reasonable reduction toward the 2030 target.

Other questions relevant to HMI:

<https://www.gov.ie/en/consultation/0dfc7-public-consultation-on-ten-year-strategy-for-the-haulage-sector/>

Section 3 -

Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

- Such locations would very suitable places to co-locate hydrogen refuelling facilities.
- Road Usage Charging - a new reduced tolling incentive regime for alternatively-fuelled HGVs should also apply to hydrogen Fuel Cell Electric Vehicles.

Section 7 -

Labour Market - The deployment of modern, suitable, zero-emission haulage vehicles, such as Hydrogen fuel Cell vehicles should help make a career in the Sector attractive to a wider range of young people than with, what many might see currently as part of a polluting infrastructure.

Section 8 -

Rail - investing in Hydrogen fuel cell electric trains to carry more goods, as well as people, would be less costly than electrification of the entire system, would be strategically important environmentally as well as delivering enormous emissions savings.

³

https://www.transportenvironment.org/sites/te/files/publications/2015%2009%20TE%20Briefing%20Truck%20CO2%20Too%20big%20to%20ignore_FINAL.

Much of the road freight transport carried out within Ireland depends upon intermodal freight transport connectivity with the maritime, aviation and rail sectors - These locations would be ideal locations to co-locate hydrogen refuelling facilities.

Integrated Transport Planning - hydrogen & hydrogen refuelling stations must be part of the solution to reducing emissions in transport in all freight & haulage sector across all HDV vehicle types.

Hydrogen Mobility Ireland (HMI):



Hydrogen Mobility Ireland (HMI) is a Not-for Profit organisation with members (see above) across Power Generation, Fuel, Gas, Vehicle and Transport Sectors focused on the roll-out of Hydrogen as a viable Zero-emissions Transport fuel particularly for the Heavy Vehicle Sector. We have been actively engaged in direct consultations with significant operators in the Transport Sector through our Vehicle End-user Group giving us input into the potential needs of Transport Operators on the ground and seeking their views on Hydrogen as an option for the Sector.

HMI also work closely with Hydrogen Ireland Association and academics across the island of Ireland including Dublin City University & Belfast to develop suitable solution for mobility in Ireland.

As our particular focus is on the provision of a Zero Emission Vehicle and Renewable Fuel solution we have limited our Response in this Consultation, to the key issue of the Environmental challenge facing the Sector over the next ten years. As the ultimate goal is

the transition of the Sector to Zero Emissions rather than lower emitting, which may work inadvertently to extend the dominance of diesel in the Sector, we have focused specifically on the Zero-emitting solutions of Battery Electric Vehicles and Hydrogen Fuel Cell Vehicles. While catenary technologies are also a possibility, the huge cost of installation of overhead lines on public road space on specific strategic heavy traffic corridors for the potential number of vehicles in the Irish context makes this a less likely option in the period between now and 2030.

Background:

In 2018 Transport accounted for 40% of energy related CO₂ in Ireland (SEAI)⁴. With just 0.9% of freight carried by rail Ireland is almost totally dependent on Road Transport for freight and Bus/Coach Transportation and such vehicles are almost exclusively diesel (99.66% of Goods Vehicles, Large PSVs, School and Youth/Community buses were diesel at the end of 2019⁵).

The demands on these vehicles make them very difficult to decarbonise while continuing to deliver as required to support a vibrant Economy, yet progress on replacing diesel vehicles with BEVs and FCEVs will be hugely important if this heavier emitting sector is to see a significant reduction in emissions over the next 10 years. Unlike the progress of BEVs in the Private Car Sector there has been no significant number of ZEVs registered in this Commercial Vehicle Sector. Again as with BEV cars, the roll-out of ZEV vehicles will only commence when the supporting infrastructure is in place.

Ireland has set ambitious targets, to be enshrined in Law, amounting to a 51% reduction emissions over the years 2021-2030, decade⁶. To underline the challenge in Transport, according to the EPA⁷, Transport Emissions decreased by just 0.3% in 2019 and they note that Transport demand is still increasing. Under their WEM Scenario (With Existing Measures), they projected Transport Emissions increasing by 10.2% over the period 2020 to 2030. While they projected a decrease of 13.4% over the same period under their WAM Scenario (With Additional Measures), which assumes 936,000 electric vehicles on the road by 2030. A 13.5% reduction by 2030, while significant, is still some way short of the required 51%.

In recent years some progress has been made with Private Cars in relation to the Target of 936,000 EVs on the road by 2030 with an increase from just 6 new BEVs registered in 2008 to 4,013 new BEVs registered last year and on current trend perhaps in excess of 8,000 in

⁴ <https://www.seai.ie/data-and-insights/seai-statistics/key-statistics/co2/#:~:text=High%20emissions%20from%20transport,of%20the%20recession%20in%202012>.

⁵ Irish Bulletin of Vehicle & Driver Statistics 2019, Department of Transport, Tourism & Sport.

⁶ *Government approves landmark Climate Bill putting Ireland on the path to net-zero emissions by 2050* Department of the Environment, Climate & Communications, Press Release 23 March 2021.

⁷ <https://www.epa.ie/our-services/monitoring--assessment/climate-change/ghg/transport/>

2021. With imported used BEVs added to the new ones, a total of 17,104⁸ BEVs were on the road by the end of last year, perhaps reaching somewhere close to 26,000, including used imported BEVs, by the end of 2021. 26,000 BEVs would represent 2.6% of the 936,000 Target with 9 years to go.

The Challenge of Decarbonising the HDV Sector:

In its calculation of Share of Energy Related CO₂ by Sector, SEAI indicate a total of 15,277 KtCO₂ for the Transport Sector in 2018⁹. The Oireachtas Joint Committee on Climate Change has recommended a target of 51% reduction in emissions by 2030 over 2018 levels. While some savings might be made from Eco Driving and other initiatives, the Kms driven in HDV Sector are not discretionary and cannot easily be subject to planned reductions as they are literally a consequence of the level of commercial activity in the State. The reality is of course that such activity may either increase or decrease over this period. The challenge for this Sector is that currently no suitable Zero Emitting Vehicles are available and although this will change with both BEVs and HFCEVs being available between now and 2025, work on sourcing a supply of specific vehicles for Ireland needs to be happening now.

The Ten-year Strategy for the Haulage Sector First Consultation Document recognises that the transition to alternatively-fuelled vehicles is a significant challenge for the road haulage sector. At the same time, it highlights that the movement of goods by road remains the second biggest source of transport emissions after private car use and states that Heavy Duty Vehicles (HDVs) alone contributed over 19% of Ireland's total land transport emissions in 2019. Heavy-duty vehicles – trucks and buses – are responsible for about a quarter of CO₂ emissions from road transport in the EU and for some 5% of total EU emissions.¹⁰

And yet this may also provide an opportunity, as well constructed and focused action on a relatively small number of HDV vehicles could deliver significant emissions savings if successful. In a fleet of 2.2Million cars the 17,000 EVs on the road at the end of 2020 could be estimated to give an annual saving of around 30,000 Tonnes of CO₂ compared to 17,000 ICE (Internal Combustion Engine) car registrations that they replaced¹¹. One could estimate that a similar level of saving could be gained from just 350 high mileage ZEV HGVs and Coaches¹². As Transport & Environment put it, *"...less than 5% of all vehicles on the road emit around 30% of road transport CO₂ emissions, which can be explained by their high mileages – around 100,000 km per year for a long haul truck – and high fuel consumption – around 34,5 l/100km or 900g CO₂/km¹³.*

⁸ Department of Transport, Bulletin of Vehicle & Driver Statistics 2019 + SIMI MotorStats 2020 & 2021 (to end May)

⁹ <https://www.seai.ie/data-and-insights/seai-statistics/key-statistics/co2/>

¹⁰ https://ec.europa.eu/clima/policies/transport/vehicles_en

¹¹ Calculation based 17,000 cars with Annual Mileage of 15,000Kms at emissions of 120Gms/Km

¹² Calculation based on 350 HDVs with Annual Mileage of 100,000Kms at emissions of 900Gms/Km

¹³ Too Big to Ignore – Truck CO₂ Emissions in 2030:

https://www.transportenvironment.org/sites/te/files/publications/2015%2009%20TE%20Briefing%20Truck%20CO2%20Too%20big%20to%20ignore_FINAL.pdf

While emissions reductions have been achieved by the Sector through additional Bio Fuels and Eco Driving, it is hard to see how a reduction of the required scale can be achieved without good progress in the roll-out of Zero emissions HDV vehicles early and over the period up to 2030. But this is a particular challenge in relation to heavy vehicles, SEAI have highlighted that for HGVs; “..their greater size and weight substantially increases the barriers to batteries serving as a substitute for diesel”¹⁴. At the same time, they note that the HGV fleet is ageing with vehicles 10 years or older accounting for 45% of all vehicles, if transition (to cleaner ones) doesn’t occur there is a considerable risk of ‘locking-in’ a large cohort of HGVs to diesel for years to come. And all of this is in the context of the projection that HGV activity is expected to treble between 2015 and 2050.

An EPA Report on Decarbonising the Transport Sector concluded that “...promoting the deployment of alternative fuels and the vehicles that use them requires different types of policy involvement, depending on the fuel in question (NG, biofuels, electricity or hydrogen) and the state of technological maturity. Their deployment typically requires support across four areas: research, design and development (RD&D); market uptake of AFVs; adequate access to charging or refuelling infrastructure; and the availability of alternative fuels”¹⁵.

The EPA underlines that State supports which will be required to support early roll-out of Alternative Fuel Vehicles, in relation to vehicles, fuel and refuelling infrastructure should only be required until the technology has reached a level of sustainability. “The purpose of policies that act in favour of AFVs is, to incentivise the sale of this new technology to a point at which it overcomes the initial barriers and begins to achieve a greater market share.”

The Challenge of Renewing and Decarbonising the Existing HDV Fleet:

HMI has established an End-user Group of Vehicle Operators to consult about sustainable solutions, as they will have to make decisions on which Zero-emitting vehicles are most suited to their needs. This Vehicle End-user Group includes significant Freight Operators covering National and International operators, as well as Bus/Coach and Taxi Groups including their National Representative Bodies.

This isn’t an easy time for the Transport Sector with Covid, Brexit and facing the need to decarbonise in the context of huge pressures on price from their customers and the urgency of just-in-time deliveries. And with no workable ZEV options yet available to them in the Market Place, there are concerns in renewing the vehicles in their fleets. Will newly-purchased cleaner diesel trucks be penalised at some point between now and 2030? Will other lower emissions (but not zero) options be similarly disadvantaged and how will their future vehicle values stack-up? While this won’t stop fleet renewal it is likely to slow it at a time when we urgently need to reduce emissions. In addition, the availability of relatively cheaper imported used vehicles from the UK, including vehicles that may be disadvantaged there as a result of emissions-based access or enhanced emissions requirements at

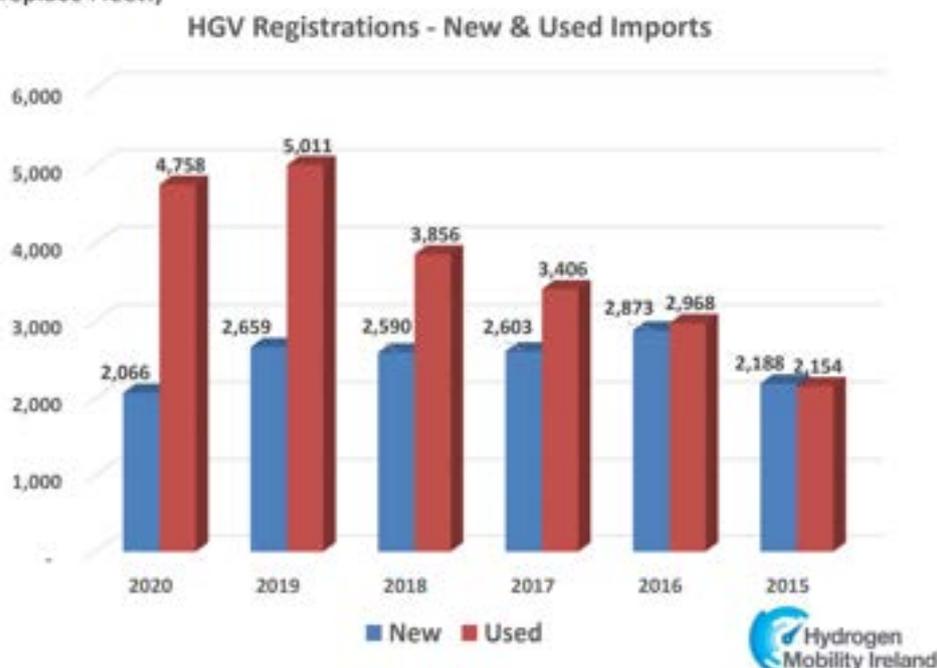
¹⁴ <https://www.seai.ie/data-and-insights/seai-statistics/key-statistics/co2/#:~:text=High%20emissions%20from%20transport,of%20the%20recession%20in%202012.>

¹⁵ Opportunities to Decarbonise the Irish Transport Sector (2014-CCRP-MS.24) EPA Research Report. July 2020

Roadworthiness Testing. Whatever the cause, New HDV registrations (referred to as HGV in Irish Registration Statistics) have fallen by 31% from 2016 to 2020, while registrations of Used HDVs imported from UK have increased by 66% over the same period. So far this year New HDVs have increased by 23%, while Used Imported HDVs have increased by 77%. To put this in simple terms New HDV registrations are running at a fraction of those for Used HDV Imports; 53% of the number of Imports in 2019 and 43% in 2020.

Replacement of Current Fleet Depends on rate of New Registrations

New HDV Registrations have fallen by 28% and Used Imports have increased by 60% since 2016 (At 2,066 New Registrations per Year it would take over 20 Years to replace Fleet!)



Even without this additional dampening factor impacting on fleet renewal, the challenge to decarbonise the HDV Fleet is a big one. According to the Department of Transport data there are 40,000 HGVs and there are currently no ZEVs in the Sector and it is in relation to these vehicles that SEAI had pointed out that vehicles 10 years or older account for 45% of the total. In this context it is worth repeating their concerns:

- If transition (to cleaner ones) doesn't occur there is a considerable risk of 'locking-in' a large cohort of HGVs to diesel for years to come.¹⁶
- HGV activity is expected to treble between 2015 and 2050.

The Oireachtas Joint Committee on Environment and Climate Action recently noted, "as with private cars, it takes on average 14 years for Ireland to replace its truck fleet"¹⁷ and that

¹⁶ <https://www.seai.ie/data-and-insights/seai-statistics/key-statistics/co2/#:~:text=High%20emissions%20from%20transport,of%20the%20recession%20in%202012.>

¹⁷

https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_environment_and_climate_action/reports/2021/2021-06-03_report-on-reducing-emissions-in-the-transport-sector-by-51-by-2030_en.pdf

is an accurate view as to what we would normally expect to see with an annual replacement rate based on New Vehicle Registrations running at a level around about 3,000 new vehicles per year. When we look at gauging the length of time it might take to replace the truck fleet with ZEVs, there are a number of variables that impact on the timescale. While the speed of replacement of vehicles in the National Fleet is driven by the level of Annual New Registrations, the percentage of each year's registrations that are older imports will impact, as will the percentage of each year's registrations that are ZEVs.

If the average New HGV Registrations are at 2,500 per year (as they have been between 2015 and 2020) it would in theory take 16 years to replace the entire fleet, assuming that an older truck leaves the fleet for each new one that enters. Of course the dynamic may have additional variables, as some younger trucks may be written-off and some older ones may live-on. The fleet total may grow by retention of older trucks but the whole process is hugely impacted by the number and age of used imported vehicles also entering the fleet.

Between 2016 and 2020, in Ireland we have had an average total of 6,000 HGV vehicles being registered per year which would suggest that the fleet could be replaced in 7 to 8 years, if these were all new vehicles. But as mentioned, on average only 2,500 of those are new HGVs, and last year it was just 2,000 new. With an annual level of 2,000 new HGV registrations, replacing the fleet would in theory take 20 years. The impact of the Used Imported vehicles on all of this depends on their age profile. From 2015 to the end of June this year, an average of only 3.3% of the Used HGVs imported were Current-year HGVs, while 25% were Over ten years old. So far in 2021 3.8% of Imports have been Current-year HGVs and 27% (734 HGVs) were Over 10 years old.

The speed of replacement of the HDV fleet by ZEVs depends not just on the rate of new vehicle registrations but also on the percentage of ZEVs included in those new registrations (average 2,500) each year. Where there are used Imported vehicles also entering the fleet the question is what percentage of the (average 6,000) total new and used registrations are ZEVs. As an example in 2021 registrations of new BEV Cars are running at 6.5% of the total new vehicle registrations. At a similar annual rate 6.5% of 2,500 new HGVs it would take over 200 years to replace the fleet. But of course such registrations are not linear they tend to start low and grow as the technology gains favour. To underline the need to start early and aim high in relation to the market share for ZEVs is that even if they averaged 33% of new registrations over the next ten years (significantly higher than EV cars have yet reached) we would achieve somewhere around 20% of the fleet being ZEV by the end of that period. If on the other hand an average of 33% of combined new & used registrations (6,000) was achieved, the ZEV level would be around 50% of the fleet after 10 years. These are not easy levels to reach particularly in the context of used vehicles (and especially where ZEV HDVs are likely to be in very high demand and in short supply in the State where the used imports are coming from) but all of this illustrates the size and complexity of the challenge to decarbonise the Sector and the reason why an early start to the process will be so important.

SEAI has pointed out that for HGVs; their greater size and weight substantially increases the barriers to batteries serving as a substitute for diesel and this has been visible in the

registration statistics¹⁸. A total of 11,021 new and imported used HGVs have been added to the Fleet during 2020 and 2021, just 10 are listed as BEVs while 1,716 are diesels that were over ten years old at the time of registration, suggesting that emissions in the Sector will continue to move in the wrong direction unless action is taken. Decarbonising the HGV fleet will require a very specific, focused plan based around the performance requirements of the sector.

The Light Commercial Vehicle Sector:

For the majority of LCV Commercial Vehicles, BEV solutions are a potentially suitable option and we have seen the percentage of BEV sales increase from 1.3% of the New LCV Market in 2019 to 3.3% in 2020 and is currently running at 2.4% in the first 6 months of this year. This has added almost 1,500 LCV BEVs to the Vehicle Parc since the start of 2019. Used LCV imports which average between 40% and 45% of the level of the new vehicle market, have included only 16 BEVs over the same 2½ year period, representing 0.05% of imported LCVs since 2019.

Clearly the rate of registration of LCV BEVs will increase and will begin to deliver a significant contribution to decarbonising the current fleet. The level of imported used LCVs is not as high as with HDVs, running at 53% of New LCVs registered in 2019 and 46% of new LCVs in 2020. While, there is nothing wrong in importing used LCVs into Ireland, if this means adding additional older diesel vehicles to the fleet at a time when we are seeking to replace such vehicles with ZEVs, it is counterproductive and does not make sense. The age profile of the imported vehicles has averaged (From Jan 2015 to end June 2021) about 6% current year vehicles, 62% over 4 years old and 11% over ten years old. In 2021 up to the end of June only 35 were current year while 16% were over 10 years old. To put that in context, while 417 new BEV LCVs were registered so far this year, 671 diesel LCVs over 10 years old were also added to the fleet in the same period.

Obviously it would be preferable if only ZEVs were imported but as these are valuable and in relatively short supply in their own market, it is more likely that we will continue to see older diesel vehicles (which are likely to be less attractive to buyers in their home market) imported. This will slow the rate of replacement of the diesel fleet with ZEVs. To underline this, last year there were 44% more diesel LCVs over ten years old added to the fleet than LCV BEVs (New + Used) and in the first six months of 2021 there were 59% more diesel LCVs over ten years old registered than LCV BEVs (new and used).

At the high mileage end of the LCV fleet we can see from the RSA data (See below under heading: The Options EV or LCV – This is not a Competition) that there are some 700 LCVs that cover in excess of 100,000 Kilometres per year. In addition, there will be another considerable cohort of vehicles that may travel less than 100,000 Kms but are required to travel well beyond 480 Kms per day on a regular basis. In addition, many of the LCVs that regularly make long journeys are in food delivery and refrigeration is another challenge in the potential replacement of diesel by BEV alone.

¹⁸ SIMI Motorstats

For such demanding transport operators range anxiety is a very significant issue, particularly given the huge mileages and the potential impact of the resultant frequency of recharging on vehicle range over the longer term. Energy Ireland noted the issue of reducing range and how this might impact on prospective buyers; *“...new EV models have a range of at least 400km although this degrades to approximately half this after a few years. This makes infrequent long-distance trips more difficult, as they require refuelling mid-journey. While more data is needed to better understand driver behaviour and attitudes, these longer trips appear to be more salient to prospective EV buyers compared to their typical daily driving distance.”*¹⁹

These very high mileage LCV vehicles that produce the highest emissions and will be the most difficult to change from diesel to BEV, yet these specific fleets too could be targeted, as with the HGVs, in a focused project, working with the Sector to begin the process of decarbonising the higher emitting vehicles. It should also be noted that an increase in activity in this Sector, and likely increased vehicle mileages, may be anticipated due to the new retail model of online ordering that developed during Covid and is likely to continue to grow post-Covid.

The Coach and Bus Sector:

Although not a part of the Haulage Sector, in many ways the environmental challenges that face Coach and Bus operators are very similar to those that exist for HGV Operators. For the State, the challenge of seeking significant emissions reductions in the Coach and Bus Sector is again very similar and for many of the same reasons. Given that the current development of a ten-year strategy for the Road Haulage Sector is inevitably going to have a strong focus on the Environment and on potential policies/solutions that might help to deliver significant emissions savings from heavy vehicles, the related Bus and Coach Sector should not be omitted from consideration in this process. The challenge of decarbonising the Bus and Coach Sector, with its own heavy, long distance and high mileage vehicles raises the same issue of seeing BEV as a one solution to fit all requirements in the Sector. Again we know from the RSA data that there are around 700 vehicles (See below under heading: The Options EV or LCV – This is not a Competition) in the Sector that travel more than 100,000 Kms per year and again there are many vehicles below that annual mileage that are regularly required to travel more than 480Kms per day in delivering the services that they provide.

As with the other Sectors these highest emitting vehicles that can be seen as the most difficult to decarbonise, could actually be a start point for decarbonisation, with a focused project, working with the Sector could provide significant early progress. If some of the highest emitting vehicles could be changed to ZEVs then the emissions savings will be far more substantial than a similar number of lower-mileage lower-emitting ones making that change. Supporting a transition to zero-emission vehicles powered from renewable

¹⁹ <https://www.energyireland.ie/infrastructure-enabling-transport-decarbonisation/> 8 Dec 2020

Hydrogen in the Tourist Coach Sector, engaged in carrying tourists in what is viewed as a green island, would carry a particularly strong message.

A project focused on changing some of the highest emitting vehicles in each Sector to ZEV could contribute a greater reduction in emissions. In addition, the benefit of such a message, that even the most demanding, heavy and long distance vehicles can be changed to ZEV, would be hugely helpful to the overall project of convincing all vehicle users to make an early change to ZEV.

The Options Battery Electric or Hydrogen Fuel Cell Vehicle – This is not a Competition:

There are many opinions about whether HFCEVs or BEVs are the better solution, in our view they are complimentary, supporting solutions rather than competing ones - we need both.

The International Energy Agency (IEA) state that making Net-Zero emissions a reality hinges on a singular, unwavering focus from all governments - working together with one another, and with businesses, investors and citizens. They outline a view of the transition in transport from now to 2030 and beyond to 2050.

Electrification plays a central role in decarbonising road vehicles. Battery cost declines of almost 90% in a decade have boosted sales of electric passenger cars by 40% on average over the past five years. Battery technology is already relatively commercially competitive. FCEVs start to make inroads in the 2020s. The electrification of heavy trucks moves more slowly due to the weight of the batteries, high energy and power requirements required for charging, and limits on driving ranges.

But fuel cell heavy trucks make significant progress, mainly after 2030 (Figure 3.23). Almost all light-duty vehicle sales in advanced economies are battery electric, plug-in hybrid or fuel cell electric by the early 2030s.

For heavy trucks that operate over long distances, currently biofuels are the main viable commercial alternative to diesel, and play an important role in lowering emissions from heavy duty trucks over the 2020s. Beyond 2030, the number of electric and hydrogen-powered heavy trucks increases as supporting infrastructure is built and as costs decline (lower battery costs, energy density improvements and lower costs to produce and deliver hydrogen).²⁰

To underline the challenge for HGVs and why a choice of fuel options is crucial, in Norway, perhaps the leading country in the World for BEV uptake (with 340,002 Electric cars on road by the end 2020)²¹, while 3 BEV Trucks were registered in 2009, the total BEV Truck Registrations between the start of 2009 and the end of 2019 was 53. A further 37 were registered in 2020²². By the end of 2020 BEV cars represented 12% of the 2,823,543 cars on

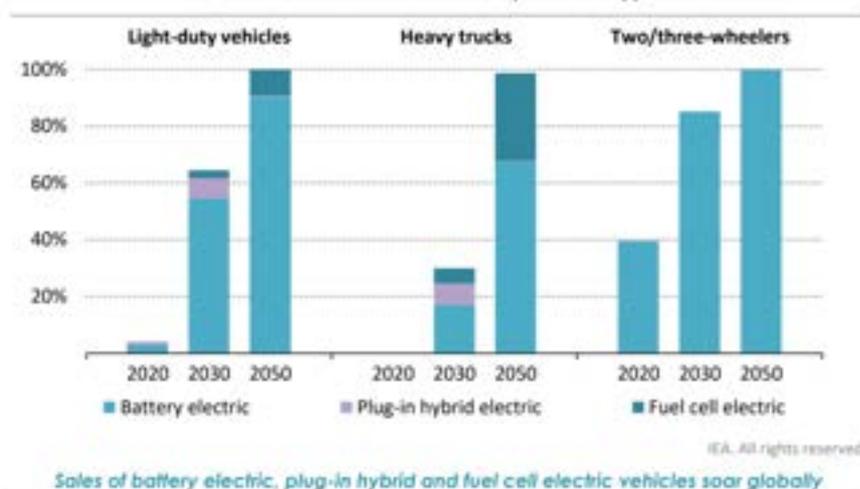
²⁰ IEA: Net Zero by 2050 A Roadmap for the Global Energy Sector May 2021

²¹ <https://www.ssb.no/en/transport-og-reiseliv/landtransport/statistikk/bilparken>

²² <https://www.statista.com/statistics/1027890/number-of-electric-trucks-registered-in-norway/>

road in Norway while the 90 BEV Trucks represented just 0.13% of the 70,670 Trucks on road at end 2020.

Figure 3.23 > Global share of battery electric, plug-in hybrid and fuel cell electric vehicles in total sales by vehicle type in the NZE

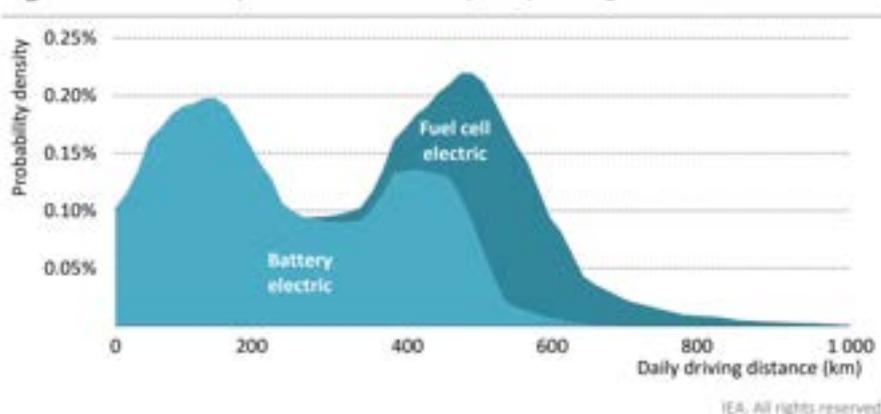


Sales of battery electric, plug-in hybrid and fuel cell electric vehicles soar globally

Note: Light-duty vehicles = passenger cars and vans; Heavy trucks = medium- and heavy-freight trucks.

IEA see daily distances driven are a likely deciding factor for operators in the choice between BEV and HFCEV Heavy Trucks. By 2050 they see about 2/3 BEV, 1/3 HFCEV with Fuel Cells dominating on the longer journeys. Their current projections based on cost etc. suggest that FCEVs take over at around 480 Kms a day.

Figure 3.24 > Heavy trucks distribution by daily driving distance, 2050



Driving distance is the key factor affecting powertrain choice for trucks

One solution will not fit all and is in truth a risky strategy, if adopted. This view is clearly supported by both the International Energy Agency (IEA) and Transport & Environment (T&E) who both underline that BEV will be the most widely used solution but that FCEV will be the solution of choice for heavier and longer distance vehicles. T&E have recently written a joint letter with ACEA (European Vehicle Manufacturers Organisation) to the European Commission underlining the need for progress on infrastructure for both BEV and HFCEV Heavy Duty Vehicles under the Alternative Fuels Infrastructure Directive (AFID):

“We, the signatories, are writing to ask for your urgent support for the roll-out of the necessary re-charging and hydrogen re-fuelling infrastructure suitable for zero-emission heavy-duty vehicles. This must be addressed in the review of the alternative fuels infrastructure directive.all heavy-duty vehicle manufacturers have either already started or are ramping up the series production of zero emission trucks and buses. New powertrain technologies will fast become the backbone of road transport, with battery-electric and hydrogen-powered vehicles being the key zero-emission technologies for heavy-duty trucking. However, the re-charging and hydrogen re-fuelling infrastructure that is suitable for heavy-duty vehicles and indispensable for their operation is still largely missing.”²³

The Oireachtas Joint Committee on Environment and Climate Action recently heard evidence that *“due to short haul distances and Ireland being a small country, truck batteries would be the most efficient measure though cost and availability will be the immediate issue.”* While all of this is true in respect of a large portion of the Commercial vehicle fleet, as highlighted by IEA and T&E different solutions may be required for the smaller number of high mileage HDVs. The average mileage figures that are available can somewhat obscure the importance of those higher mileage vehicles to the economy and the importance of finding a solution that can deliver the performance that is required in response to the demands facing transport providers and their client enterprises.

Unfortunately, much of the available data on HDVs show Average Mileages that cover both Light and Heavy vehicles which makes it difficult to calculate potential ZEV take-up or emissions savings. The Central Statistics Office shows an annual average of 22,407 Kms Combined Heavy & Light Goods vehicles, which would seem adequately covered by current BEV ranges, as indicated.

If we look at mileage data recorded by the RSA at HGV Roadworthiness Test intervals in CVRT testing, a little more detail is available. This information indicates an average of over 48,000 Kms per year for 2 Axle HGVs and over 73,000 Kms per year for 3 Axle HGVs.

Among vehicles that have recorded over 100,000 Kms per year, are around 5,000 HGVs, 700 LCVs and 700 Buses/Coaches. But of course there are many vehicles below that annual mileage that are regularly required to travel more than 480kms in a day as a key part of their business. That is roughly Dublin - Cork return but of course Heavy Duty Vehicles often serve more than two points in their schedules.

DCU has recently undertaken a survey of Heavy Transport operators seeking their views on alternative fuels and their willingness to order such vehicles. While the survey has yet to be finalised and released, Interim data shared by DCU in a presentation, indicated that among 63 responding fleet operators (c. 2,900 vehicles), Respondents showed most interest in hydrogen for decarbonisation. 49.3% of respondents were interested in being directly

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https://www.transportenvironment.org/sites/te/files/publications/2021_04_letter_TE_ACEA_trucks_AFID_FIN_AL.pdf

involved in a potential shared project, by aggregating orders to bring hydrogen trucks to Ireland as early as possible.

And you have to ask, for Transport Operators cost and reliability are key issues: yet they are interested in buying-in to an unknown Technology, perhaps from a not previously known manufacturer with no previous service & support presence in HGVs in Ireland. Obviously they are hard-nosed business people and will want to be reassured on many issues but the range, ease and speed of refuelling without the serious concern at the potential for major delay problems with the double challenge of Driver Statutory Rest Periods and recharging times. On paper these might fit neatly together at the same time, reality on the road is unlikely to be that consistently generous.

HMI and the Vehicle End-user Group of vehicle operators have begun looking at the possibility of aggregating orders and we have also had initial exploratory discussion with Vehicle OEMs. If Project to aggregate orders can deliver 400 HFCEVs to replace high mileage Diesel HGVs, Emissions saving would be equivalent to about 20,000 EVs replacing Fossil Fuel cars.

A potential Impact from Brexit:

While the Haulage Sector faces many ongoing challenges from the advent of Brexit and this may impact on HDV routes to market in Europe, it may also impact on Ireland with regard to the future supply of new technology ZEVs. Ireland is a very small market for new vehicles in Europe and we can see from the Imported Used Vehicle statistics we have been in a position to take advantage of a bigger neighbouring market to source vehicles to satisfy demand in the market place. The European Union is effectively a Left-hand Drive Market, for example 98.6% of cars on EU roads are Left-hand Drive (LHD). Ireland's car fleet represents 70% of the 1.4% Right-hand Drive (RHD) cars on EU roads, the only other Member States that require Right-hand drive vehicles being Malta and Cyprus. Before the UK left the Union, Right-hand drive cars represented 13% of the European fleet.

Up until Brexit both RHD and LHD vehicles including HGV and LCV were subject to EU Type Approval, WVTA for complete vehicles or Certificate of Conformity in the case of multi-stage incomplete vehicles, which is often the case for HGVs. As UK Commercial Vehicle standards and approval requirements may diverge from those required under EU Type Approval, Ireland may require different certification, with all that entails for a manufacturer, than may be produced for similar vehicles produced for the UK market. While initially, at least, differences in vehicle requirements may be small but it will still require a separate set of EU Type Approvals for similar Commercial Vehicles for EU and UK markets. The RSA has highlighted the new situation since well in advance of Brexit:

- *When the UK leaves the EU single market, the UK VCA (Vehicle Certification Agency) will no longer be an EU Type Approval Authority. From 31 December 2020 the end of the transition period, type approvals issued by UK VCA (e11) will become invalid.*

- *The supply of UK-type approved products in the Irish market will be limited to those productswhich were placed on the market before 31 December 2020.*
- *....Vehicles built in several stages may include two or more stages of bodybuilding before becoming a completed vehicle. The Irish bodybuilding industry would typically use the National Small Series Type Approval (NSSTA) path in order to obtain approval for the completed vehicles. In the case where the incomplete stage was produced on the basis of a UK VCA issued (e11) type approvalthese CoCs for incomplete vehicles will actually become invalid after 31 December 2020.²⁴*

In 2020, 292,657 new RHD LCVs and 39,312 RHD HGVs were registered in the UK, while 1,439,427 new LHD LCVs and 247,499 LHD HGVs were registered in the EU. The total RHD registrations in the EU in 2020 were 23,309 LCVs (around 8% of the UK total) and 2,035 HGVs (around 5% of the UK total). The reason why all of this is important is that the manufacture and distribution of new vehicles is driven by market demand. In the case of new technology vehicles such as ZEV Commercial Vehicles, which are likely to be in high demand and short supply, it is likely that a big market like the UK will capture RHD vehicle output specifically Approved for their market. Unless Ireland stakes a claim for specific supply of required ZEV vehicles from EU manufacturers at an early stage so they will invest in RHD vehicles for use in an EU Member State, we are unlikely to see sufficient volume to enable a transition of the fleet.

The EPA has noted that *because of its being a “technology taker” rather than a “technology maker”. Ireland does, however, have the ability to influence the purchase of vehicles through policy”. In relation to Heavy Duty Vehicles, Ireland has historically been a taker of older technology rather than being a strong market for new more expensive cleaner technology.* The registration statistics, obvious to manufacturers show that the new HGV market (2020) represents just 43% of the market for Imported older HGVs. Having engaged with a number of European HFCEV truck manufacturers, it is clear that their willingness to commit to produce vehicles, that will be in huge demand in so many Member States, for a national market will be based on their level of confidence in the initial demand and the commitment of the Member State to support delivery of a refuelling infrastructure.

At this point in 2021, there are no ZEV models on the market in Ireland for interested and willing HDV Operators to make the switch. At the same time, we are aware that RHD HGVs, Buses/Coaches and LCVs are planned and will be manufactured for delivery at different stages between now and 2025 by a number of different manufacturers. Projects in a number of Member States and in other States such the UK and Switzerland are already working to place forward orders for production and delivery right up to 2025. If we are to be a part of this transition to ZEV, Ireland will need to be in a position to engage in sourcing vehicles for delivery a number of years in advance.

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[https://www.rsa.ie/Documents/FAQs%20on%20Impact%20on%20Type%20Approval%20of%20Motor%20Vehicles%20under%20Brexit%203%20\(1\).pdf](https://www.rsa.ie/Documents/FAQs%20on%20Impact%20on%20Type%20Approval%20of%20Motor%20Vehicles%20under%20Brexit%203%20(1).pdf)

While we have been looking at these challenges for HDVs in relation to HFCEV vehicles but similar challenges are likely to limit the supply of all ZEVs unless Ireland has an active approach, helping to drive our presence in the marketplace so Ireland can demand the required supply of vehicles. Such an active involvement of the State in projects focused on assisting the Transport Sector to decarbonise are also likely to be supported by the EU under the European Green Deal. The objective of the European Green Deal to ramp up production and deployment of sustainable alternative transport fuels across Europe and the Consultation Document suggests that this will have a beneficial impact on smaller transport markets including Ireland, which imports transport technologies from other states. The Commission will be reviewing the State aid rules in relation to how governments can provide financial support including an increased focus on assisting the transport sector to transition away from fossil fuels.

Relative Value for Money Proposition supporting HFCEVs in the HDV Sector:

A review in 2019 by the Department of Public Expenditure & Reform, stated that “...the average EV purchaser receives a direct subsidy from the State of between €10,141 (PHEV) and €13,616 (BEV). This suggests that if the current supports are continued, every 100,000 new EVs will cost the Exchequer €1.36 billion²⁵”. The 20,000 EVs registered by the end of last year (saving over 30,000 tonnes of CO₂) on this scale of support, would have cost the State somewhere in the region of €272 Million plus investment in Home and Public Charging infrastructure, suggesting a total in excess of €400M. As further EVs are added to the Fleet, further ongoing investment supports will be required for further Charging points.

While the EU Alternative Fuels Infrastructure Directive (AFID) recommends that member states ensure one publicly available charger for every 10 electric vehicles, which would suggest a network of 2,000 public chargers for 20,000 EVs, the Department of Transport stated in its 2017 Alternative Fuels Framework that the 1:10 ratio of chargers laid out in the AFID would likely never be necessary to support wide-scale EV deployment. In any event between Public and home Charging infrastructure the States investment will have been significant.²⁶ In addition, “few private charging companies operated in Ireland in the past and while this is starting to grow, it is difficult to estimate the number of privately owned and operated charging stations and whether they represent a comprehensive network. The dearth of commercial providers is likely not helped by the small size of the Irish market and its low EV penetration, which limit appeal to potential market entrants”.

Although a fuller submission would be required to outline a fully developed project but in rounded cost terms, 400 FCEV HGVs with workable National Refuelling Network of around 30 refuelling stations (that would support a far larger roll-out in the years ahead) could deliver a reduction of over 30,000 tonnes of CO₂ in addition to the other damaging

²⁵ Spending Review 2019 Incentives for personal Electric Vehicle purchase, Department of Public Expenditure & Reform Aug 2019.

²⁶ *<https://www.energyireland.ie/infrastructure-enabling-transport-decarbonisation/> - 8 Dec 2020

emissions. The cost (depending of levels of support etc.) between Refuelling and vehicle purchase supports would be in the region of €250 Million.

Haulage Journeys are not Discretionary - Decisions are Driven by Customers Needs:

Emissions from Transport are the second largest, after Agriculture but that shouldn't be surprising. While Transport includes leisure driving, it also includes commuting to and from work in each of the other Sectors as well as all of the deliveries and collections for those other Sectors. Although the emissions from these journeys on behalf of those other Sectors are listed under Transport;

1. Transport emissions result directly from the level of activity in other sectors - in 2017 the greatest share of freight activity was carriage of foodstuffs (25%).
2. Responsibility for reducing Freight Transport emissions needs to be seen as to at least partly rest with the enterprises for whom the Transport is provided.

The challenge for the State is to support a transition in Transport that delivers for the Environment yet ensures a vibrant commercial economy into the future.

In the Strategy Document accompanying this Consultation it states: "*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 vehicles*". Feedback from a wide range of transport operators across the Sector suggests that while there may be statements from businesses, suggesting such an orientation by manufacturers/retailers, there is little evidence and effectively no demand. While they may be seeing this from a different perspective, up to the end of June 2021 the total number of BEVs in the Sector is 1,626²⁷ (including LCV, HGV, Buses & Coaches) representing just 0.4% of the commercial vehicle fleet. At the same time, as we have already seen, 45% of the National Fleet is over 10 years old and there are greater number of additional older higher polluting vehicles entering the system than Zero Emissions ones.

Transport contracts are awarded on reliability, punctuality and price and there is little evidence yet that customer companies have been willing to pay more to support the Transport Operator in providing reduced-emissions (but costlier) vehicles. This may be related to the fact that emissions produced by vehicles engaged in their collections/deliveries do not appear on a company's energy statement. Whether or not ZEV vehicles are used to transport goods is in the power of the client customer to decide, which suggests that such companies should also have to answer for the portion of Transport emissions over which they have direct control.

Transport users need to be incentivised to demand Zero emissions logistics and perhaps also to see a downside to not making that transition. At present choosing the cheaper option

²⁷ Irish Bulletin of Vehicle and Driver Statistics 2019, Dept. of Transport & Tourism + SIMI Motorstats HGV + LGV Registration Statistics 2020 & 2021

may be more rewarding. If transport users actually were to demand a low (or zero) CO₂ transport solution, from their carriers, decarbonisation would progress at a significant pace.

While a vehicle's EU Emissions Class is available at point of registration, it is not entered on vehicle registration records and documents in Ireland. This would appear to be a serious omission given the degree of focus on emissions and the importance that should be placed on this information at the point of purchase and registration of a new (or imported) vehicle. The lack of such information on the vehicle record/documentation makes the possibility of creating Low Emissions Zones (or a reduced toll system etc.) much more difficult as no data is readily available, or visible to the customer/user. It is also a lost opportunity to educate purchasers and users as to the potential level of pollution arising out of what they are buying/driving. This would then lay the foundation for the public to better understand and choose to upgrade to a lower emission option. Currently we may be one of the few countries in Europe where the public and the commercial sector are not confronted with this information at the point of registration and in their vehicle documentation thereafter.

The Challenge of Providing a Refuelling Network:

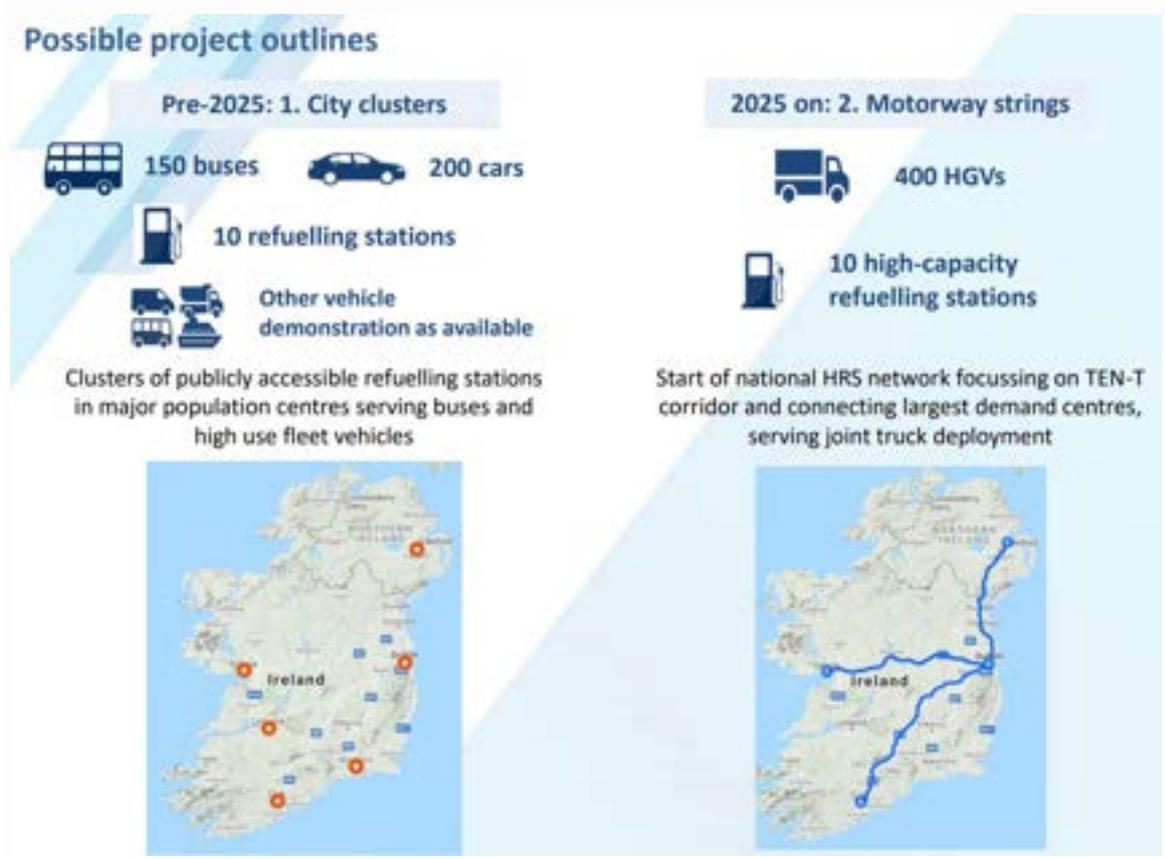
Energy Ireland recently noted that; *"Few private (BEV) charging companies operated in Ireland in the past and while this is starting to grow, it is difficult to estimate the number of privately owned and operated charging stations and whether they represent a comprehensive network. The dearth of commercial providers is likely not helped by the small size of the Irish market and its low EV penetration, which limit appeal to potential market entrants"*²⁸. This highlights the challenge in providing the charging/refuelling Network required to support the roll-out of alternative fuel ZEVs, whether BEV or HFCEV. The simple fact is that there will be insufficient business for many years, while there are few of the BEV/HFCEV vehicles on the road, to justify a commercial decision to invest in the infrastructure. At the same time the vehicles will not be purchased and put into service if a sufficient charging/refuelling network is not in place.

While in the longer term when the number of BEVs & FCEVs increases substantially, as ICE vehicles are phased-out, there will be a commercial case and the potential for many competing providers in the Network. In the initial phase, though, and this is the case in relation to Alternative Fuels, there is a requirement for governments to be active in supporting early roll-out to prime the system, when there isn't a strong commercial case, to ensure that the environment and the economy can benefit, from the infrastructure being provided, into the future.

Another factor that also contributes to the early low rate of return on investment is the fact that whether Electricity or Hydrogen, the fuel/energy is a commodity and so will tend to be low price and widely available from multiple sources. Indeed, in the early stages, these Alternative Fuels have to compete with diesel and petrol to be able to win over increased numbers of users, so this reality of low prices is actually necessary to drive the fuel to increased numbers of users.

²⁸ <https://www.energyireland.ie/infrastructure-enabling-transport-decarbonisation/> 8 Dec 2020

HMI has developed a Network plan commencing with an initial small hub, likely near Dublin and expanding to around 30 Hydrogen Refuelling Stations (HRS) to give a credible level of National coverage over a period. As the focus is on longer distance vehicles, the commitment to provide a Framework National Network within a reasonable timescale is crucial to gaining commitment from users. Indeed, Truck manufacturers have indicated that without the potential of a refuelling network being in place or rolling out, they would not see how they could supply vehicles into the market. A draft outline



For Bus and HGV fleet operators own-base refuelling, subject to safety, planning and cost, is a potential option, although this doesn't help the roll out of other HFCEVs as such facilities are not normally open to other users. Similarly, Depot refuelling could be based at key busy transport locations such as Dairy facilities, Cement production sites and ports. These may serve a mix of users but again may be limited to users of the facility providing the refuelling location. Then we have public refuelling stations to support all HFCEV users and looking at other countries where these are being rolled out, high throughput stations are seen to be necessary to deliver a commercial return to the provider in the longer term. However, the higher throughput stations cost more to provide initially and the early stations will have few users for a very long time. Additionally, with just above ½ the average population density of the EU, we are unlikely to see the same vehicle density in Ireland, as in the majority of other Member States.

Of course the potential to base a Hydrogen Refuelling facility on an existing Filling station, subject to safety, planning and cost, is also possible and has the attraction of sharing cost and of being part of a potential transition for the Station from fossil fuels to renewables. Refuelling stations have a long history of competing to sell commodity fuel where retail prices are driven down by strong competition. In fact, they have found that a commodity fuel, while not particularly profitable to sell in itself, can act to bring customers to the site, where they will buy far more profitable items such as coffee, food, drinks, sweets etc. Interestingly Elon Musk has announced his intention to offer entertainment and hospitality services at Tesla charging centres. Tesla has previously experimented with self-service food and beverage stations as well as rest and lounge areas at their charging centres. It is likely that future EV Fast Charging centres will look to locate where other income can support the installation.

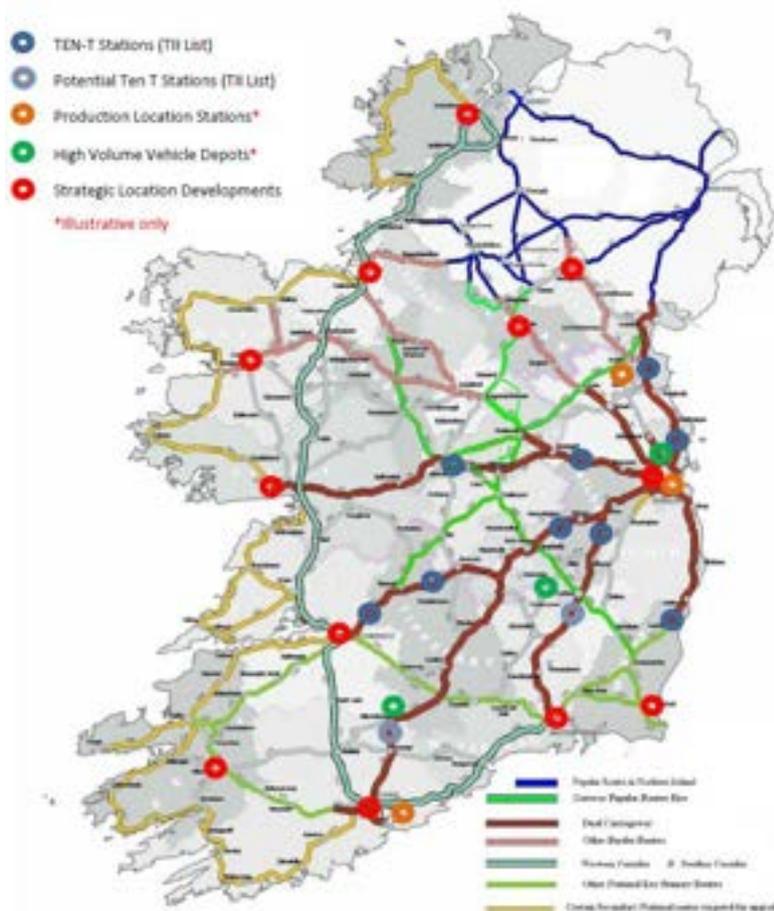
National Road Network refuelling Sites may be the key locations for the installation of a good part of a HRS Network. If the HRS Network plan is focused at delivering sufficient National coverage to 'normalise' HFCEV purchases and use by transport operators, then it is hard to see how this can be done without a strong visible presence along key National routes. The potential commercial challenge in justifying an investment in such an expensive location is not likely to be easy, at least at the early stages between now and 2030. It is clear that Fuel Importers/Retailers will eventually have to migrate entirely to alternative fuels or move to an alternative business model, so in due course one would expect to see the development of more HRS stations and more competition as vehicle numbers grow.

At the end of the day, fuel purchase decisions tend to be driven by price and location. In relation to location, existing Filling Station Operators, particularly the major brands already have the best main road sites, where you want them to be. They are also designed to live on various supporting income streams, selling fuel to customers for as low a price as possible but knowing that the customers will spend money on other things, when they stop for fuel.

In developing a draft HRS Network Map for illustrative purposes, we have been conscious of EU proposals to update the Ten-T Regulation with the intention to include Hydrogen as a required fuel that should be available at points on the Network. In Ireland the Main route from Dundalk to Cork and Limerick are a part of what was termed the North Sea - Mediterranean Corridor. With the potential increase in direct traffic from Continental Europe through Rosslare, due to Brexit, the future route may need to include that section

also. The Commission proposes to include hydrogen transport infrastructure in the scope of the TEN-E Regulation to facilitate European-level planning for hydrogen infrastructure. Member States will need to ensure the availability of alternative clean fuels.

The illustrative Network shown is an early outline of what may be needed in terms of a framework National Network by 2030. This includes some locations in strategic regional towns to ensure adequate coverage for both freight and Bus/Coach operators. Clearly these locations have not been finalised.



**By 2030
What might a
Minimum Sustainable
HRS Network Look
Like?**

**- illustrative Map
show 30 Locations**

Transport Infrastructure Ireland have confirmed that they have service areas that meet the regulations (but don't yet provide the alternative fuels) either open, under construction, or at tender at six locations: Lusk and Castlebellingham on the M1, Enfield on the M4, Athlone on the M6, Kilcullen on the M9 and Gorey on the M11. They say that there are also existing facilities off the Motorways that meet the criteria at: Mayfield (Junction 14) on the M7 and Moneygall (Junction 23) on the M7. A number of other off-motorway facilities at planning approval, at construction or already in operation may meet or could be upgraded to meet the criteria including: Birdhill (Junction 27) on the M7, and a combination of Cashel (Junction 8) and Ballacolla both on the M8. Other locations where future facilities could meet the criteria are: Mitchelstown to Fermoy (Junction 13 to Junction 14) on the M8 and Carlow South to Kilkenny (Junction 6 to Junction 8) on the M9. These Existing or future facilities on the National 'core' route network are likely to be required to provide Hydrogen refuelling at some future date.

At some stage in the next number of years HFCEV HGVs and Tourist Coaches, as well as other vehicles, arriving here from other EU countries will need to have access to H₂ refuelling along these routes as a minimum. These twelve key locations (to be added to in due course) would form the backbone of a National HRS Network and would facilitate the decarbonisation of the HGV Transport Sector in Ireland, not just supporting European vehicles here but making a significant contribution to meeting our emissions targets. This is something we are likely to have to provide for EU Transport operators arriving here in the future. If the State were to seek to gain benefit from supporting and encouraging investment to deliver these HRS facilities now (or as soon as possible), we could make substantial strides in relation to HGV emissions for an investment we may well have to make at a future stage, from which we will benefit far less.

The experience in relation to the slow-rate of progress in providing CNG Refuelling facilities on the National Road Network, should emphasise the necessity of making decisions and acting early to ensure that we can start making significant emissions reductions before 2030.

European TEN-T Network

Map 1: The TEN-T Core Network Corridors - focus on Ireland

Source: European Commission

Using Hydrogen as a fuel for Heavy Vehicles, through refuelling at HRS Filling Stations, unlike BEV charging, places no extra demand issues on the National Grid as it will be produced from renewable energy at periods of low electricity demand.

For the level of investment required to support an initial National HRS Network, a small number of stations can support a large number of vehicles. Growth in the HFCEV fleet will not require ever further refuelling points in the way that increased BEV numbers will and again will place no strain on Power Network.

HFCEV Transport is an All Island Project:

Climate change is a world problem and here in Ireland, it should be approached as an all island project. For the Transport Sector, which operates as far as is possible, without seeing a border in place, solutions really need to be all-island solutions. HMI works closely with our colleagues engaged in similar projects in Northern Ireland and we share quite a number of members in common. The H₂ Bus trial that HMI was involved in organising in 2020, was the first such vehicle in use in service on the roads in Ireland. Since then there has been significant progress in Northern Ireland with the GenCom project in Northern based around HFCEV Buses (manufactured in Antrim) entering service on routes in Belfast and fuelled by renewable Hydrogen generated from renewable energy produced by a windfarm in County Antrim.

There is a real opportunity to deliver a significant all-island project that would allow us to jointly source suitable vehicles from manufacturers by aggregating our orders and to put in place a refuelling network that could cover the whole island with a relatively small number of well-located HRS. Given the potential of the Ten-T Network to cover Dundalk to Cork and Limerick, as well as perhaps Rosslare, continuing this to Belfast and Derry in a joint approach would put this island to the forefront in delivering a real solution to removing emissions from the heaviest most polluting, yet most needed vehicles on the road.

Articulating the case for Hydrogen in Transport

For the EU and many EU Member State Governments, H₂ is an important part of their strategy for decarbonising the Heavy Transport Sector. For the Heavy Transport and Bus & Truck Sectors H₂ Vehicles are a key Zero Emissions Transport option. In Ireland, while Hydrogen is seen as Environmentally important for the future, a specific strategic commitment to H₂ in relation to Heavy Transport has not yet developed or at least been articulated. Decisions now will define Ireland's future emissions performance from the Heavy Transport Sector. If we are to be an outlier in the EU, by limiting our Heavy Vehicle Fleet to a single zero-emissions technology (BEV), how will this impact on our National performance in decarbonising our fleet.

The required supply of hydrogen should not provide any challenge as we understand that two projects, based on wind energy in the West are close to Planning Application stage and a number of others also in the pipeline in the years ahead in advance of the ESBs massive Green Atlantic Project scheduled for 2028.

It is often overlooked that the use of Hydrogen as a fuel for Heavy Transport, is also crucially important to Hydrogen producers, particularly those coming on stream early as they are likely to have no market for their product for a considerable period. It is likely to take a very long time, for those very big energy users who may switch over to H₂, to get through the likely planning, safety and technical challenges. Clearly they will need H₂ to be available when they are ready but where can the producers sell it in the meantime. The export of Hydrogen to Germany, among other countries, has been mentioned but does it make sense to export a fuel in preference to utilising it here first to help us to save on harmful emissions

Hydrogen can actually help to counterbalance the potential pressure on the grid from one million cars recharging from the grid. T&E looked at the challenge of E-charging a national

fleet of 2 million vehicles at same time versus refuelling as and when required (uncontrolled charging based on need). During uncontrolled charging, the vehicle is plugged into a fast charger when the battery is exhausted, regardless of the prevailing demand or energy price. Although this type of flexibility (charge-on-demand) may be required and highly desirable for hauliers, it is not necessarily the case that it will be adopted on a wide scale as this type of operation requires over-investment in infrastructure and typically results in higher electricity prices. Fast charging poses a different strain on the grid, as the infrastructure itself can limit the amount of power that can be transferred. For example, in a future scenario of a full fleet of BETs, fast charging anywhere between 5-50 trucks at a roadside charging point could draw 1.5 MW to 20 MW.²⁹

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https://www.transportenvironment.org/sites/te/files/publications/20180725_T%26E_Battery_Electric_Trucks_EU_FINAL.pdf

Ten-year Strategy for the Haulage Sector

Submission by Iarnród Éireann



30th June 2021



Foreword from Jim Meade, Chief Executive

Iarnród Éireann is delighted of the opportunity to made a submission to this first round of consultation on the development of a Ten-Year Strategy for the Haulage Sector. We recognise the important of this sector to the economy and wish to contribute to its' development over the times ahead as it addresses sectoral specific challenges and contributes to Ireland's response to the challenge of climate change in particular.



Jim Meade
Chief Executive

Iarnród Éireann believe's that rail can play a more significant role in Ireland's future decarbonisation while working collaboratively with all haulage sector stakeholders towards achieving wider desired national outcomes. With the population projected to increase and economic growth anticipated to continue it is recognised that the requirement for haulage will expand further over the coming decades. Responding to growth while achieving targeted reductions in harmful emissions will necessitate the development and application of new and innovative solutions, with those that contribute most to creating a sustainable future as priority.

Rail has recognised strengths in moving large and bulk volumes of freight efficiently and sustainably, especially over longer distances. Road haulage is highly flexible, efficient over shorter distances and responsive to customer needs. Combining the strengths of both modes to offer integrated, customised and efficient end-to-end solutions offers Ireland the opportunity of delivering a sustainable freight transport system that contributes to emission reduction while supporting economic growth.

After engagement with a wide range of stakeholders, review of potential demand and study of how other European Union countries use rail, we have prepared a Rail Freight 2040 Strategy to guide the development of rail freight for Ireland over the coming decades. This has been used to inform our submission here and will be the basis of further discussions with the Department of Transport over coming months.

This new strategy highlights Iarnród Éireann's commitment to the improvement of freight services and our ambition to increase the role of rail freight to support the logistics and supply chain industry. As is the case in other countries the development of a sustainable rail freight offer requires collaboration across all stakeholder groups, particularly those setting policy, providing investment funding, transport users, logistics providers, port and local authorities.

We look forward to collaborating closely with all stakeholders across the freight and logistics industries as we progress and implement this strategy. We also look forward to opportunities to further provide engage on the development of the Ten-Year Strategy for the Haulage Sector should the process allow for this.

Vision: A thriving rail logistics system, supporting sustainable supply chains, the economy, society and environment

This submission provides an overview on how we believe rail can play an enhanced role in freight transport for Ireland, as suggested by Rail Freight 2040 Strategy, and addresses the sectoral themes put forward in the Consultation Document where they are most relevant to rail.





Foundations we are building on



25 services per week on behalf of 3 customers

A **new** Ballina to Waterford service commencing summer 2021



Improves quality of life, safety and reduces energy consumption



Previously an integral part of Ireland's freight distribution system



One train transports the equivalent of 25 trucks



Operates on a network of **2,200km** across

76% less emissions that road transport



Overview of Rail Freight in Ireland



Historically rail has played a more significant role in Ireland's freight distribution system and was an integral part of the supply chain for many of the country's largest producers and distributors. These included Guinness Ireland, Irish Cement, Irish Fertilizer Industries, Tara Mines and Irish Sugar, all recognising the value of rail for the efficient transport of their raw materials and finished products in large quantities. Changing industries and the development of a motorway network has resulted in a rail freight decline over recent decades with growing calls for this to be reversed as a response to the need for sustainable transport solutions

Introduction

Ireland has always used rail for freight transport with this continuing today in service of the following three customers:

- **Boliden:** Transporting zinc and lead concentrates from Tara Mines to Dublin Port
- **IWT (International Warehousing and Transport):** Transporting containers of product from Ballina Beverages and other customers in Ballina to Dublin Port for international export
- **Coillte:** carriage of pulpwood from Ballina and Westport to Waterford

Combined these account for approximately 25 trains per week with this reducing harmful CO2 emissions by 5,000 tonnes per annum. A new service, to operate between Ballina and Waterford, for XPO Logistics has been announced for introduction in the summer of 2021.

Rail played a more significant role in the movement of freight in the past, as can be seen from the figure below, when in the closing decades of the last century it transported approximately 3,000,000 tonnes per annum.

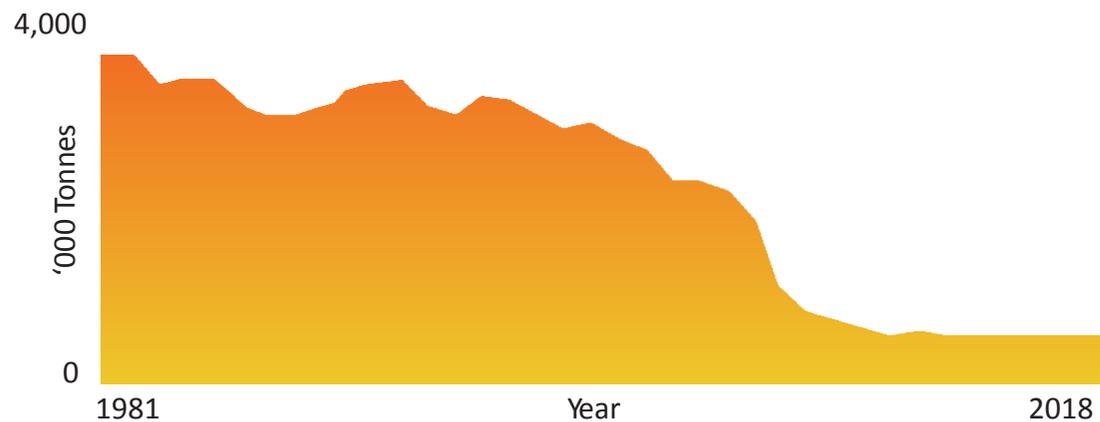


Figure 1: Rail Freight Tonnage 1981-2018 (CS0)

Irish Rail Network

- DART (Passenger Service)
- Boliden (Mining)
- IWT (General)
- Coillte (Forestry)

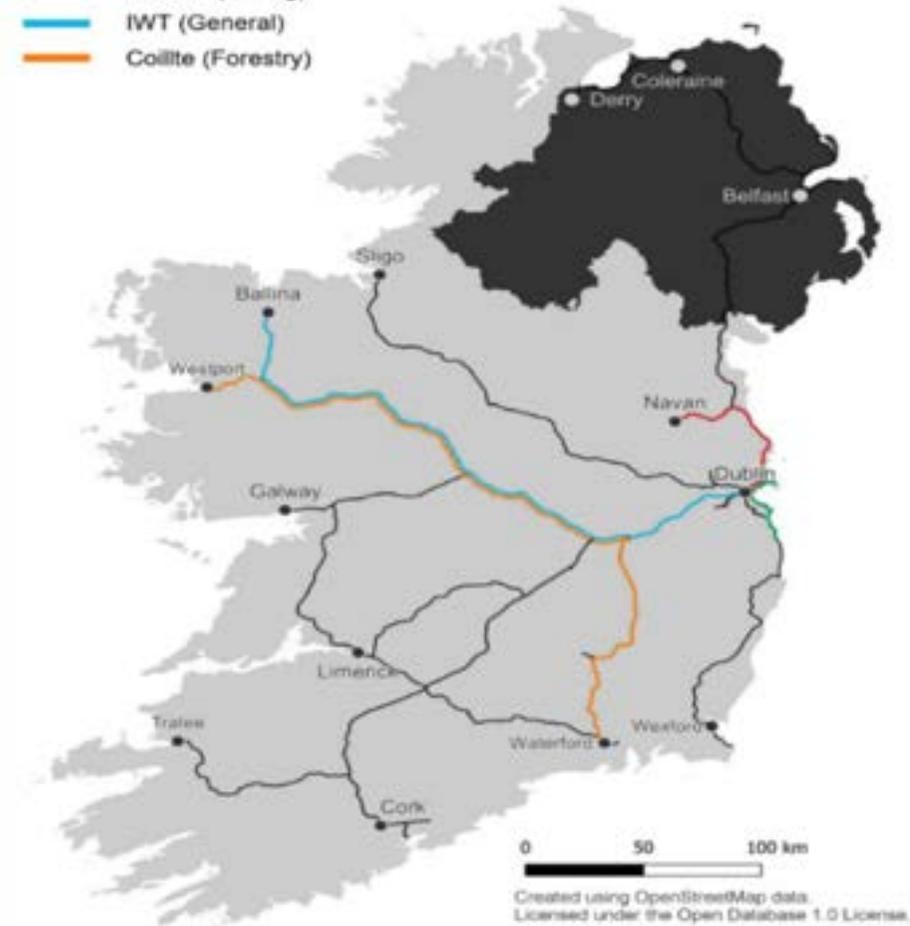


Figure 2: Map on rail network and current freight services

How rail can contribute to the Haulage Sector?



Road haulage is becoming increasingly challenging as service providers battle with rising congestion, concerns about environment impacts, stricter compliance requirements and driver shortages. Yet customer expectations continue to rise. Rail freight could be a support to alleviating some of these pressures. It offers many benefits, having the capacity to move large volumes efficiently with reduced emissions and can be developed in support of road options to provide integrated services that build on the respective strengths of both modes. This and the following pages consider key industry challenges and how rail may contribute to addressing them.

National and European Policy

- Supports EU Green Deal and Transport Emission targets
- European Union and railway operator plans to achieve a 30% rail market share by 2030, increasing from 18% now
- Project Ireland 2040, National Development Plan, National Mitigation Plan and Climate Change Action Plan are all supported by an increased use of rail

Environmental Benefits

- Rail is a 'clean and green' mode of sustainable transport
- Efficient energy consumption is achieved by rail
- Improved safety and reduced levels of noise
- The external costs of road are 6 times those of rail

Rail Freight Demand Analysis

- Overall demand for freight is projected to near double, by circa 91%, to 2050
- Key demand is along interregional corridors served comprehensively by the existing rail network
- Further demand and sectoral analysis is being undertaken to establish demand and opportunities for rail freight to contribute to an overall sustainable solution



Reduction of external costs for society

Road Sector Pressures

- Increasing congestion from all road-based modes is impacting on sectoral capacity to meet growing customer expectations
- Rail can assist in relieving pressure on the motorway network, allowing other flows of people and goods to travel more freely
- An ageing profile of Heavy Goods Vehicles drivers and reduction in new entrants is leading to skills shortages

National Ports

- The strategic masterplans of Ireland's Ports need rail in support of fulfilling on their ambitions
- EU Policy requires Tier 1 ports to be rail connected by 2030
- Covid and Brexit have highlighted the importance of providing options at ports for system resilience

Supporting Economic Growth

- Rail can be part of an integrated offer supporting the sustainable transport of goods for a growing economy
- Developing intermodal terminals supports an efficient concentration of logistics activities and employment growth
- Rail can assist in the reduction of external costs as the economy grows

Considering industry challenges and how rail may assist

Supporting Climate Objectives

Project Ireland 2040

Developing a sustainable freight distribution network for Ireland in support of economic growth and towards decarbonizing transport networks, especially as population continues to grow, will challenge all stakeholders to work innovatively and collaboratively to achieve climate objectives

CHALLENGE

Desired Project Ireland 2040 and Climate Action 2050 outcomes, for sustainable and regionally balanced development in particular, will be challenging to achieve for a country almost exclusively dependent on a road based distribution system as population and economic growth continue at pace

Rail freight can be an integral part of a distribution industry for a growing economy, working to its strengths for bulk and longer distance movements, while collaborating with the road haulage sector to provide integrated transport solutions and a range of service options

ACTION

Develop a rail freight offer that supports future regional development, economic growth and other Project Ireland 2040 outcomes by providing a viable, robust and resilient rail freight network which meets the expectations of modern supply chains and complements the development of the road haulage sector

The development of rail freight in parallel to decarbonizing road based freight will lessen the impact of freight transport on the environment and the communities served while supporting population and economic growth

IMPLICATION

Complementary development of an expanded rail freight network will deliver a less harmful freight distribution system for the environment though will require investment in infrastructure and rolling stock to modernise rail freight services and attract new customers.

Growth in the freight sector outstrips the rate of modal shift to low and near zero carbon emission forms of freight transport resulting in a negligible decrease in harmful environmental impacts.

RISKS

Without investment in supporting infrastructure and rolling stock, improvements in the delivery of rail freight services will be limited. This risks missing an opportunity to develop a sustainable freight transport offer based on the combined strengths of both rail and road modes

Wider External Challenges

Providing Effective and Efficient Solutions

External challenges, with those of Covid-19 and Brexit recently experienced, ageing and increasing shortage of skills in the industry have reinforced the need to have a range of service options that complement each other and provide supply chain resilience

CHALLENGE

Providing a freight transport solution that meets the needs of a regionally balanced economy and rising customer expectations, while being efficient and cost competitive for users and reducing impact on the environment is a challenge requiring all stakeholders to work collaboratively on

Develop rail infrastructure and services as an integral part of the freight distribution system in support of providing a wider range of service options and resilience

ACTION

Build on the established rail network, adding infrastructure and facility enhancements where required, to enable new service developments that combine with road haulage for first and last mile requirements to offer customers an efficient and environmentally friendly service offer

A well developed rail freight distribution system will complement the road haulage sector providing a wide range of service options while supporting economic growth and decarbonizing of the freight transport sector

IMPLICATION

Developing rail, for the movement of large volumes efficiently, as an integral part of an integrated freight distribution system will increase service options, develop standards and improve cost competitiveness for many industries

Failure to develop rail freight will limit industry options and increase exposure to the risk of supply chain impacts from wider, emerging along with unforeseen, external challenges

RISKS

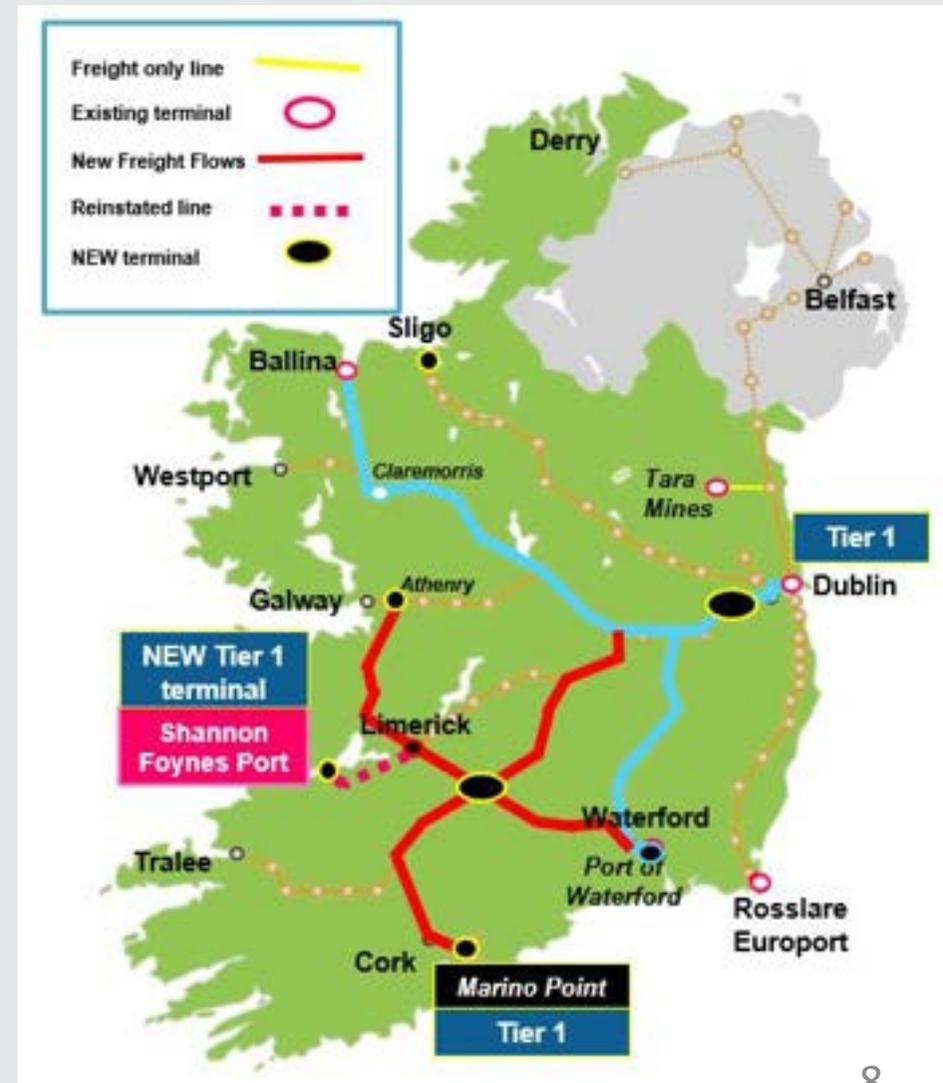
Capital investments for required rail infrastructure and facility development not available or delayed will limit the capacity of the rail mode to impact positively for the distribution industry and contribute towards reducing harmful emissions

Rail freight 2040 Strategy: Based on 5 Strategic Pillars

Stakeholder engagement, demand projections and the need for the transport system to decarbonize all point towards a requirement for rail to be developed as an integral part of the future of freight distribution. This will be made possible by developing new and enhanced rail connections at Ireland's Tier 1 ports, providing a network of intermodal terminals and services, connecting with large industrial customers while modernizing rolling stock fleets. In line with policies across most European countries support will be required for the development of infrastructure and services needed to achieve the desired future state by stakeholders. A wide range of planned initiatives are grouped under five strategic pillars with these to be implemented over the lifetime of the strategy.



<p>Enhancing connections with sea ports</p>		<ul style="list-style-type: none"> Infrastructure and services will be enhanced for increased capacity at each of the Tier 1 ports Reinstate the Limerick-Foynes Port line, upgrade of Marino Point infrastructure for bulk traffics and more rail freight services at Dublin Port
<p>Develop an intermodal port network</p>		<ul style="list-style-type: none"> Strong demand for intermodal services on main Dublin-Cork corridor and across wider network Provide large intermodal terminals to the west of Dublin and at Limerick Junction with tactical terminals at other locations based on demand
<p>Addressing Rolling Stock requirements</p>		<ul style="list-style-type: none"> An ageing fleet of intermodal and bulk wagons will be replaced and added to in service of existing and new contract requirements Replacement of locomotives with energy efficient bi-mode fleet on expiry of current units
<p>Network Developments</p>		<ul style="list-style-type: none"> Connectivity for some large scale production plants in proximity to existing rail lines Reappraise Western Rail Corridor to support rail freight ambitions, providing alternative routing options and contributing to regional balance
<p>Policy Initiatives</p>		<ul style="list-style-type: none"> Policy support similar to that in other EU countries required to achieve desired outcomes Develop organisational approach & competency Scale of Track Access Charges to be examined relative to those that apply in other EU countries



Rail Freight 2040 Infrastructure Investments

Tactical Rail Freight Terminals (TRFTs)

TRFTs will be developed in Cork, Galway and Sligo to establish a cross county network of rail freight facilities. In collaboration with road operators these terminals will expand the reach of rail freight and provide sustainable intermodal freight options to businesses across the regions.

Port of Foynes

Reconnecting the port of Foynes to the rail network will drive growth in bulk and intermodal traffic and support opportunities with mining and off shore power generation in the region.



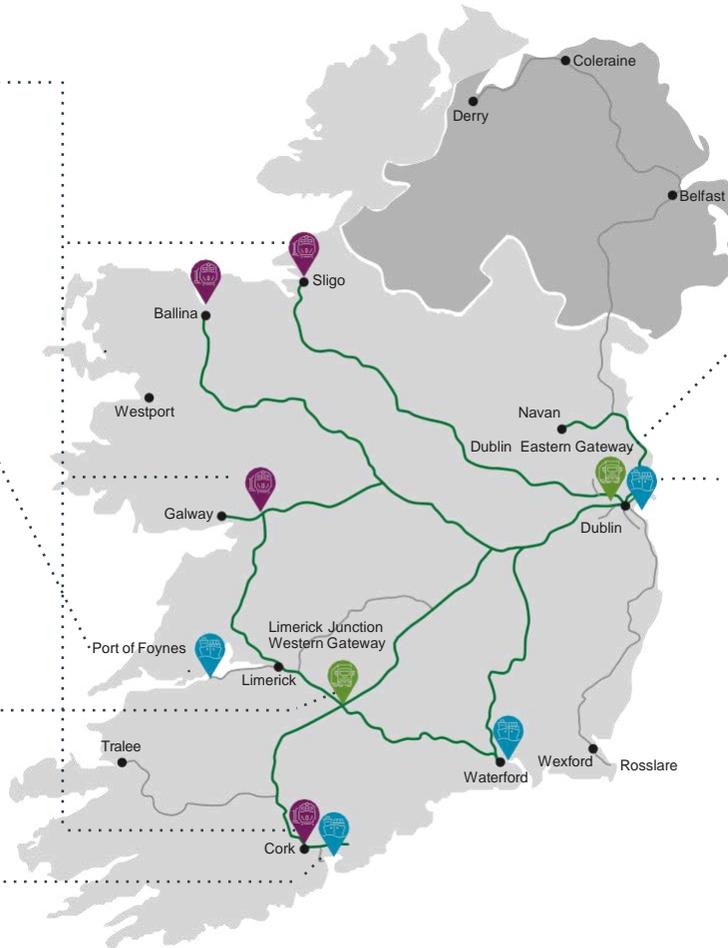
Limerick Junction Western Gateway

To capitalise on the high volumes of traffic between Dublin and the South West a Strategic Freight Terminal will be developed at Limerick Junction to facilitate intermodal traffic and support businesses across the region.



Marino Port

Re-establishing the rail connection to Marino Point in the Port of Cork will allow for the movement of bulk commodities by rail to and from the port.



Network Developments

To mitigate issues with congestion across the rail network, the interfacing of passenger and freight services and improve the efficiency of rail freight operations, a study will be undertaken to identify and develop new passing loops across the network.

Dublin Eastern Gateway

A Strategic Freight Terminal will be developed to the West of Dublin to facilitate intermodal traffic to and from the South West. The facility could be co-located with a dedicated construction materials terminal to support supplies to Dublin for this industry as it responds to housing and wider development demands over the coming decades.



Dublin Port

Operations at Dublin Port will be reviewed to optimise the integration of freight services within the port and support it in responding to longer term capacity challenges



Connection to Industrial Sites

Developing new connections to existing large scale industrial premises will increase the volume of bulk rail freight transported by rail and further reduce emissions.



Rail Freight 2040 Strategy Outcomes



RAIL FREIGHT 2040 WILL

 Provide rail connectivity to Ireland's **Tier 1 Ports** and enable improved utilisation of existing assets

 Increase the market share of rail freight in line with other European countries

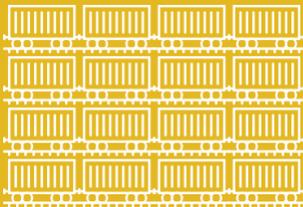
 Support regional balance and provide freight options for large industrial producers

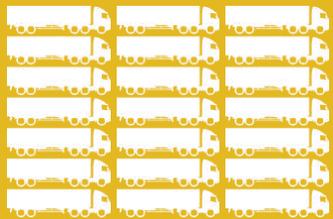
Support the objectives of **Project Ireland 2040, Regional Spatial and Economic Strategies, Climate Action Bill and The European Green Deal**

 Provide a robust and resilient network of services to support businesses and economic growth

 **Reduce** the impact of congestion in towns and cities across Ireland

 Reduce CO2 emissions by over 20,000 tonnes per year

 Provide over 100 new weekly rail freight services

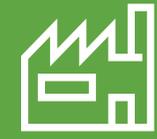
 Avoid 140k Heavy Goods Vehicle journeys per year

 Support the creation of over 8,000 new jobs



STRATEGY INCLUDES

 Investment to realise the **environmental benefits** of rail freight

 Direct rail connections to industrial facilities

 Modern intermodal and bulk wagons for improved performance and capacity

 Connection of the Port of Foynes and the Port of Cork to the rail network and the development of infrastructure and services at other ports

 A network of intermodal terminals offering logistic service options nationally

New **climate friendly** locomotive fleet



Competitive price offers that are attractive to new and existing customers



Ireland's Haulage Fleet



The ageing of the road haulage fleet, while a challenge for the industry, is an opportunity to reflect on the future desired system for freight distribution and to pivot investment towards sustainable solutions as decisions on asset replacement arise. This could involve moving to a system that combines the respective strengths of rail, for large, bulk and intermodal traffics over longer distances, with the flexibility of road for completing end-to-end journeys as an integrated offer to the market.

Road Haulage Fleet

It is recognised that the age of the national Heavy Goods Vehicle (HGV) fleet, with vehicles 10 years or older accounting for 45% of all vehicles, represents both a challenge and opportunity. It is suggested here that this be considered as an opportunity, enabling the inclusion of rail as an integral component of a future sustainable system. This may then alter the number and type of HGV's required to replace ageing fleet.

An integrated transport system, as illustrated by the figure below, where rail and road work together combining their respective strengths, could free up hauliers from having to make longer distance trips to concentrate on transfers between their customers premises and regionally based rail intermodal terminals with these ideally co-located with concentrated logistics centers.

This style of working may also be more attractive for many hauliers especially in an industry where the majority are small with over half (53%) of those operating domestically having only 1 HGV, where they have an enhanced opportunity to work local to their place of residence while potentially increasing the number of trips they can operate each day.

Intermodal Transport

Applying this model, of intermodal transport, with both rail and road working together to provide customers with a combined solution. Rail here is used for the longer distance part of the overall movement between intermodal terminals and/or seaports. While Ireland is a small island where distances are relatively short rail freight can still be both effective and efficient for the distances involved.

The European Commission consider that **'On distances exceeding 150km the average costs of moving goods by rail are usually lower than for transporting them by road'**. Additionally this is evidenced by average freight distances in the UK and EU at 150km and 220km respectively. Much of Ireland's longer distance freight movements are in this range and fall within the catchment of the rail network.

Rail Fleet

Similar to the road haulage fleet, rail wagon fleets are also ageing and effectively close to end of life. With this in mind Rail Freight 2040 Strategy includes the need to replace the wagon fleet for ongoing service to existing and new customers.

The locomotive fleet is sufficiently extensive and has reasonable life remaining to not need replacement or additional units until late in the life of the strategy.



Covid-19 and Brexit



Both Covid-19 and Brexit have highlighted the importance of including service options and resilience as key requirements of effective supply chain and freight distribution sectors. While well tested both performed well with Department of Transport and wider Government support. Risks associated with future such events, including increased frequency of extreme weather events brought about by climate change, have been highlighted. Lessons learned are to include a wide range of options and build in system redundancy so that supply lines can continue should established patterns be disrupted. Rail freight has a central role to play in this.

Covid-19

As recognised, Covid-19 has brought to the fore the interrelatedness of our supply chains and the importance of international air and maritime connectivity for Ireland. It has shown the value of having transport options and system resilience.

Rail offers these benefits and performed well in its limited role for Ireland through the most challenging times of the pandemic. On a wider level rail transport across the EU proved not only to be safe and sustainable but also extremely resilient with rail freight being the only mode of transport not significantly affected by lockdowns.

This resilience was also acknowledged by the supply chain and wider stakeholders with calls as follows for it to be built on as mitigation against future system shocks.

- Integrating rail as a core component of the freight distribution system reduces the risk of disruption from any future pandemic with its capacity to move large volumes efficiently without much human involvement
- A strong rail freight offer increases the range of service options available to users as alternatives available in the event of disruption to established channels
- Policy supports to establish a more comprehensive rail freight system as other countries have done to support them in times of unprecedented challenges

Both Covid-19 and Brexit underline the need for development of a strong rail freight system in Ireland, as an integral means of distribution during normal times, and especially as a mitigation of risk from unforeseen events that have the potential for high levels of impact on supply chains and established transport patterns.

Brexit

With some similarities to the experience of Covid-19 the exit of the United Kingdom from the European Union has further underlined the need for service options and network resilience. Enhanced rail connectivity at seaports offers the opportunity to efficiently access shipping corridors seamlessly while extra time and space needed to process clearance documentation can add significantly to road congestion. Improved connectivity with European destinations through Ports with direct connections, rather than reliance on the UK land-bridge, has become more important. This further supports the rationale for development of rail infrastructure and services at regional Ports as distributors look to establish direct routes to the EU.

The COVID-19 crisis has highlighted the need for a reliable and sustainable transport backbone for the European economy

Press releases during COVID-19 crisis

Difficulties of road	Stability of rail
Mega traffic jam at border to Poland rbb24, 21.05.2020	Battle against empty shelves – DB Cargo starts pasta express from Italy Handelsblatt, 19.03.2020
Trucks are forming 37-mile-long queues at European borders after authorities started closing them to stop the coronavirus spread Businessinsider.com, 18.03.2020	Corona virus – Rail is proving its worth beyond its green credentials. It deserves support Railway News, 19.05.2020



Making Road Freight Cleaner



The national imperative to reduce the impact of transport systems on the environment is highlighted by objectives to deliver a 30% reduction in emissions by 2030 and an 80% reduction by 2050. Rail is inherently a cleaner form of transport, with rail freight generating up to 76% less carbon emissions than road haulage and current services saving over 5 million kilograms of CO2 per annum. Further integration of rail in the freight distribution and supply chains can significantly contribute to the achievement of Climate Action Plan targets while supporting economic growth.

Rail supporting a Cleaner Transport System

It is noted that 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 vehicles. This was also a finding of engagements as part of preparing Rail Freight 2040 Strategy with all stakeholders referencing the environmental benefits of using rail freight and most suggesting it should be further development as part of Ireland's freight distribution system.

Integrating rail into the freight distribution system can contribute significantly to sustainability and decarbonisation, especially in a context of demand projected to near double (c.91%) by 2050. While many progressive road freight industry initiatives, such as eco-driving and Electric Vehicles, will contribute to achieving environmental outcomes, ultimately a shift to more sustainable modes, with rail suggested here, needs to be part of the overall solution to impact on the trajectory of emission growth predictable for Ireland.

European Green Deal objectives include phasing out fossil fuels with a 90% cut in emissions to be achieved by 2050 from using smart, competitive, safe, accessible and affordable transport. The Commission will be reviewing the State aid rules that set out how governments can provide financial support to particular sectors of national economics. Many, recognising the environmental benefits of rail, are already supporting initiatives that shift freight to rail. The Rail Forward document, representing an agreed approach across most EU rail freight operators, has set a target to get to 30% market share (from 18%) by 2030 recognising this will need Member State and EU Government support at capital and operating levels.

Considering External Costs

Rail has significantly lower external costs than road, with outstanding energy efficiency and proved safety systems translating into six-times lower such costs versus road freight across Europe (CE Delft 2012, Fraunhofer). This advantage increases to a factor of 85 times better than road when considering the costs related to traffic accidents and 9 times for road emissions. Even for noise rail rates about three times better than road.

The much higher external costs of road freight are in effect borne by society. Their dramatic impact is often not felt immediately by citizens but can't now be ignored in the face of an accelerating climate challenge. Therefore, the advantage in external costs must be an eligible source of justification for investment in the infrastructure and services required to support a shift to low emission rail freight services for large volume, bulk and intermodal traffics.



Modal Shift for a Cleaner Freight Transport System



Iarnród Éireann, with the support of government will seek to establish a Modal Shift Benefits scheme as used effectively in some other countries. The approach would be to work with the haulage sector and other industry stakeholders to collaboratively design support mechanisms that encourage rail use in return for its environmental, social and economic benefits. Many different schemes have been applied by other countries with one from the UK supported by the European Regional Development Fund, pre-Brexit, explored here and having potential learnings for Ireland.

Case Study: European Regional Development Fund



With limited intermodal rail freight services at the Port of Felixstowe, in the south east of England, large numbers of HGVs operating out of the port had led to significant congestion along the A14 and other routes from the port to the Midlands.

The European Regional Development Fund was used to develop partnerships between freight forwarders and rail freight intermodal service providers with a circa €4m programme focused on providing information and seminars. These forwarders were then able to claim Low Carbon Freight Dividends of up to £75 per container to subsidise the cost of rail transport if it was dearer.

This avenue may be suitable for adaptation to the Irish sector. Providing a freight dividend or cash subsidy helped operators give rail a chance and many of the 56 freight forwarders who trialled rail, found the service good and continued to use it.

As a result of these incentives and the development of rail freight facilities at the port the number of daily trains has grown from three per day during the 1980's to 21 during the 2000's, and to 34 per day in each direction out of Felixstowe today. Going forward, with track capacity recently developed, it is hoped to increase the services to 45 per day.



The number of daily trains services at Felixstowe has grown from 3 to 34, with plans to increase to 45 in the future

How rail can contribute to other themes



There are many further ways in which rail can contribute to the future of freight distribution in Ireland. As a mode with significantly lower external costs than road it can contribute to a further reduction of fatalities and injuries on roads while improving quality of life through a reduction in air and noise pollution. Many countries are implementing a combination of initiatives to support modal shift towards rail and including increased charges for road usage in recognition of its higher external costs. Planned increases in the level of 'carbon charges' used to value emissions and encourage sustainable solutions will also support a shift to rail freight over time.

Making Freight Transport Safer

All stakeholders working collaboratively to design a system based on the respective strengths of rail and road modes can contribute to further improvements in safety on our roads and continued decline in deaths toward the 'Vision Zero' principle.

While Ireland seeks to improve the health and quality of life of its citizens by increasing cycling and walking and improving facilities for these, vulnerable road users will potentially come into contact with more road freight vehicles as the economy grows. Whilst data on road accidents across Ireland demonstrates that roads are getting safer, it is important to recognise that incidents involving a HGV's tend to result in more serious outcomes in terms of number of people killed or seriously injured. In 2018 there were 143 fatalities on Irish roads.

The increased use of rail freight can contribute a continuous reduction in serious injuries, fatalities and premature deaths. Increasing the safety of freight movement will therefore not only improve the quality of life and well-being of local residents but will also facilitate and support economic competitiveness through avoiding the large costs and delays associated with incidents.

Enhance Quality of Life and Well being

Freight movements can have a significant impact on the quality of life of residents living near freight arteries. How logistics is organised can play a significant role in improving quality of life. Freight vehicles can impact heavily on the environment, making it a less pleasant experience to walk and cycle, with emissions impacting on air quality. With rail freight these downsides are minimised, so that the benefits from an effective multimodal freight distribution network can be enjoyed by residents through improved air quality, reduced emissions and enhanced road safety

Road and Rail Infrastructure

The four National Investment Framework for Transport in Ireland (NIFTI), priorities; decarbonisation; protection and renewal; urban mobility of people and goods; rural and regional connectivity, are all contributed to by establishing a strong and sustainable rail freight offer as an integral part of Ireland's distribution system.

Details of the capital investments required to implement the infrastructure enhancements and rolling stock needs of Rail Freight 2040 Strategy have been submitted to the NDP Review to Renew process for consideration.

As infrastructure for rail freight is added and distribution centers are developed around rail terminals it may become necessary to upgrade some roads for enhanced access to such facilities and for seamless connection with national roads and motorway networks.

Road User Charging

The new reduced tolling incentive regime for alternatively fueled HGVs rolled out in 2020 is acknowledged as a positive initiative to encourage a move towards lower emissions and is consistent with the 'polluter pays' principle.

Introduction of industry incentives that encourage distributors and hauliers to use rail as part of an integrated solution, similar to those in the UK and some EU countries would be an additional positive step in supporting the industry to decarbonise.



In Switzerland, the leading country in Europe in use of sustainable transport, a Railway Infrastructure Fund is part financed by a charge on the use of heavy vehicles

How rail can contribute to other themes (continued)

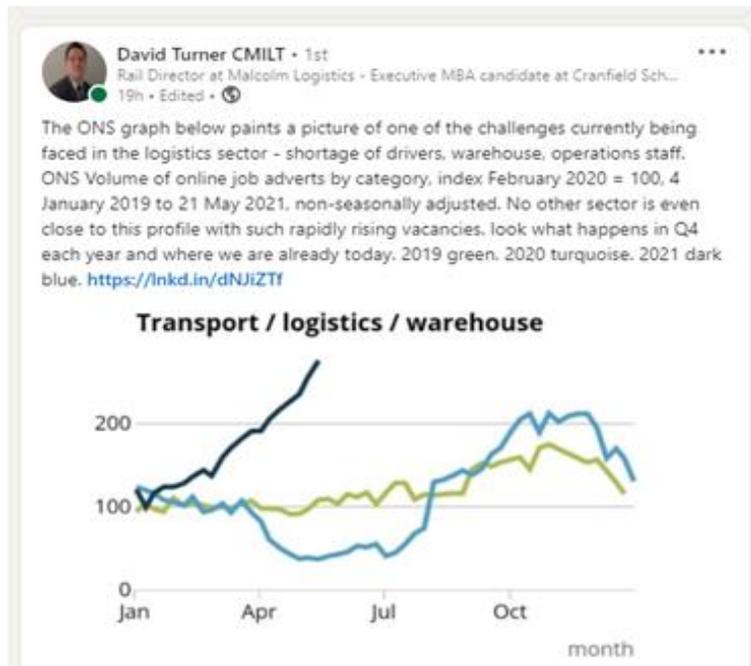


Address of the challenge of the growing shortage of skilled labour, as discussed earlier, in the road haulage sector is another area where increased usage of rail freight can support the industry. The same challenge does not exist for rail with it considered as an attractive source of employment. Additionally, development of integrated rail and road solutions act as a magnet for other industry providers to co-located their facilities on adjoining lands leading to concentrated distribution and logistics centers generating new employment across a wide range of skill sets.

Labour Market and Skills

The shortage of HGV drivers here and across Europe is recognised as a key concern for the industry, one that is projected to even become more challenging in the years ahead. The graphs and messaging below is illustrative of this challenge.

Greater use of rail, as an efficient means of moving large volumes over longer distances with minimum labour required, can contribute to easing the pressures of this industry challenge. Furthermore, drivers work-life balance can be improved by working with rail, operating more shorter distance trips to and from rail terminal rather than continually traveling longer distances.



Employment Opportunities

The implementation of Rail Freight 2040 has the potential to generate significant levels of new employment during the construction, operation and maintenance of new facilities. This is seen as an outcome of the development of logistics and freight distribution centers in the UK at various sites that have grown significantly around rail served intermodal hubs. These developments include the construction of significant warehousing and rail freight facilities to expand logistics services in support of a diverse range of customer requirements.

Meanwhile it is projected that the working conditions for rail freight workers will improve across Europe as per the illustration below from Rail Freight Forward - a coalition of European rail freight companies committed to drastically reduce the negative impact of freight transport on the planet and mobility, through innovation and a more intelligent transport mix.

The working conditions in the rail freight sector will be significantly improved



Integrated Transport Planning and Intermodal Transport



Integrating rail into the plan for development of Ireland's freight distribution and supply chain sectors could contribute significantly to the achievement of Project Ireland 2040 strategic outcomes for transport. Barriers to the usage of rail for freight movements – limited infrastructure and services, cost competitiveness, can be overcome by all stakeholders working together and using Rail Freight 2040 Strategy as a framework for rail freight development. This would include rail and road leveraging of their respective strengths and the development of distribution and logistics centers concentrated around modern rail intermodal terminals.



Integrated and Concentrated Development

Intermodal transport is growing at 3-5% per annum across Europe and has significant potential in Ireland to reduce carbon emissions while supporting economic growth and regional balance. By comparison, in Ireland road remains by far the dominant mode and has been growing at over 1.5% per year. As other countries have demonstrated, it should be possible to reduce this dependence by converting some large trucking movements to rail.

Land use planning also plays an important role in supporting the sustainable transport of goods. Consistent with the policies promoted by Project Ireland 2040 there is a strong rationale for a more concentrated approach to the development, in particular around regional cities, of logistics and distribution centers. It is suggested in Rail Freight 2040 Strategy and here that such centers should be co-located with strategic rail intermodal terminals. This allows for the efficient and integrated usage of both rail and road modes. Such a terminal is suggested for west Dublin, at a location to be identified on the mainline rail network, within easy access of the motorway network and many already established distribution and retail centers.

Another, for example, is proposed for development at Limerick Junction, with this to be located at the point of intersection between the Dublin-Cork mainline and Waterford-Limerick line. This could allow for easy and direct connection to four of Ireland's largest Ports; Dublin, Cork, Waterford and Shannon Foynes. Equally it could support the concentrated development of logistic and distribution centers at and around this rail hub with relatively short road distances then required to service markets in Limerick and Cork cities along with all locations in the wider south-west.



iPort, at Doncaster in the UK Midlands, is an example of a modern logistics hub, with rail and road modes working together to service an increasing number of distributors, including Amazon and Lidl, choosing to develop large scale distribution centers on the same site. Daily rail services connect with the ports of Southampton, Felixtowe and Teesport while 91% of the UK's population is within a four hour driver of iPort

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Ports and Airports

A strategic pillar of Rail Freight 2040 Strategy is improved connectivity through national seaports at Dublin, Cork, Foynes and Waterford. This recognises their importance for the transport of freight in and out of the country and in the context of ambitions for regional balance.

Development of rail infrastructure and services at these ports will be the basis of a significant and sustainable shift to low emission rail freight services for large volume and bulk traffics.

Case Study: Stockholm Norvik Port

An example of a recently developed Port with rail fully integrated into its design is Stockholm Norvik Port which opened in May 2020 and has a rail line connecting its container terminal with the national rail network. This example shows the opportunities for synergy between port and rail, is an example of intermodal facility design and could be an example for Ireland to learn lessons from as developments are considered at Dublin, Cork and Shannon Foynes Ports in particular.



State Developmental Supports

The EU recognises the environmental benefits that rail freight can offer and has agreed to funding to help national governments and operators attract more business. Although there are some fixed rules on funding there are many examples of states assisting in the development of their rail freight industries and some of EU money assisting projects. For example, the TEN-T project is funding a number of major infrastructure schemes, while the Rail Baltic project which is building a whole new 870km double track electric railway from Poland to Estonia has 85% of the finance coming from the EU's central Connecting Europe Fund (CEF). This project is estimated to cost €5.8 billion though will bring in €18.2 billion in benefits.

Similarly, two Polish rail freight operators have recently bought new intermodal rolling stock, PKP Cargo acquired 936 wagons at a cost of around €87 million (of this the EU funded €43 million) and Lotos Kolej has bought 324 wagons costing €43.6 million (of which €14.8 million were allocated from EU funds).

Other EU states, are awakening to the economic and environmental advantages of rail freight as a means of economic recovery and regeneration. France's President Macron announced a massive growth plan for rail freight. Many countries also reduced Track Access Charges to rail operators as a response to Covid conditions and are considering extending these in some form as a means of creating modal shift to achieve emission reductions.



Rail Freight Sustainable Transport Solutions





Delivering the Goods

Submission in response to the Department of Transport's Public Consultation on the development of a ten-year strategy for the haulage sector

16 July 2021

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Executive Summary

Ireland's economic wellbeing and the quality of life of people who live and work here are heavily dependent on the proper functioning of a dynamic and resilient freight transport network. Ireland's domestic and international hauliers, supply and logistics organisations, ports and airports all play a vital role in ensuring Irish enterprise can compete at the highest level globally. The dual crises of Brexit and Covid-19 have revealed the full extent of this dependence and the resilience of the sector to adapt to very challenging circumstances. However, the sector now faces significant challenges ahead in the post-Covid era as it grapples with an ambitious sustainability agenda, crippling labour shortages, and increasingly complex global supply chains. As such, Ibec fully supports the development of a ten-year haulage strategy. This is an opportunity to build on the learnings of the last few years and develop a whole of government response to address the unique needs of this critical industry. Short- and long-term measures will be needed. Our recommendations below have been developed in consultation with businesses across a wide range of sectors.

Key recommendations

> **Generate more resilience in supply chains for haulage operators.**

- Covid-19 and Brexit have revealed the importance of having efficient, diverse, and resilient supply chains. As supply chains and cross-border trade become more global and complex in nature, it is vital that the haulage sector is adequately skilled and resourced to meet this demand. Government must set up a dedicated taskforce to bring all government departments together to help the transport and logistics industry to continue to operate safely and efficiently and to ensure that these essential services could continue unhindered.
- Ibec recommends that Government also develop a clear communication channel for industry and other key stakeholders to generate more resilience in the national supply chain. As supply chains and cross-border trade become more global and complex in nature, it is vital that the haulage sector is adequately skilled and resourced to meet this demand.

> **Ensure businesses have the support and guidance needed to adapt to the new post-Brexit trading arrangements.**

- A pragmatic and flexible approach to the Rules of Origin provisions of the TCA needs to be adopted. It is important that the EU and UK work together to address any arising issues and that member states implement new border and customs controls pragmatically, seeking to reduce data requirements and streamline systems where possible. Investment into national authorities responsible for cross border services, motor tax offices, test centres, driving licence services and passport offices is vital in supporting the sector.

> **Support the decarbonisation of the sector the roll-out of new incentives and supports for fuel switching, eco driving, and modal shift.**

Government should:

- Retain existing supports and incentives for commercial vehicle electrification and gasification, while supporting the build out of reliable refuelling and recharging networks for gas and electric powered vehicles.
- Improve driving efficiencies by making eco driving a compulsory element of driver CPC training and better road/route management in high emissions areas. More research is needed into the opportunities for modal shift in the sector, including an expansion of rail freight.

- Determine how competing technologies can best work together to help the HGV sector decarbonise. Integrate the insights and recommendations of the TII/DoT Road Freight Decarbonisation Study into the final Ten-Year Strategy.
- Provide regulatory certainty for the biofuel industry and support efforts to develop next generation biofuels like HDRD/HVO.

> Address labour shortages and enhance the skills base of the existing workforce.

- The haulage industry faces chronic labour shortages due to an aging workforce, increasing competition from other trades, and fewer opportunities to address skills gap with foreign workers. Through the strategy, Government should marshal existing resources and training platforms to address this shortage. Existing apprenticeships programmes must be extended to address the labour shortages and communication channels for feedback relating to the development of apprenticeships must be established between Government and the business community. Business-established training programmes need to receive cross board accreditation to foster industry loyalty and employability. Subsidies to relieve the financial burden associated with training and licensing must be put in place. Ibec understands that HGV drivers and HGV mechanics may not constitute critical skills within the Department of Enterprise framework, but there is a critical shortage of these skills. The Department should therefore consider a further increase in the ceiling.

> Provide funding and assistance to the RSA to strengthen its relationship with the haulage sector.

- Government should adequately support the RSA through increased funding for increased operational capacity. Ibec recommends that the RSA establish a dedicated communication channel with the haulage sector to foster a mutually beneficial relationship. Additionally, the RSA might invest in digital learning tools in relation to further training and education for continued development of safety standards.

> Prioritise investment in critical infrastructure projects.

- Alleviating congestion by investing in intra-regional and inter-regional road upgrades and the diversion of some trips to other modes will help to ensure the reliable and efficient movement of imports and exports. National and local authorities need to work together with the sector to develop adequate urban hubs and infrastructure. All transport workers should have access to basic sanitary facilities, and the Government should encourage service station operators accordingly.

> Develop quality road and rail infrastructure to link airports and ports to the national road and rail network.

- Government must ensure the national port system can successfully manage the spill-over from Dublin Port, as it reaches full capacity over the coming years. The proposed haulage strategy must recognise that volumes of HGV traffic through all national ports will increase substantially. Likewise, road freight investment will be important for optimisation of national airport services. Ibec welcomes the recently announced Strategic Rail Review. We hope that it will identify opportunities for enhanced rail freight, whether for existing trade or new routes.

1. COVID-19 and the resilience of Ireland's supply chain

Our economic wellbeing is dependent on the maintenance of resilient and efficient transport networks. Covid-19 put this resilience to the test by causing major disruption for domestic and international hauliers. Most of the pressures caused by Covid were unavoidable and experienced globally. The imposition of additional border checks, a global container scarcity, and the general climate of regulatory uncertainty in the early days of the pandemic were issues faced by countries all around the world. Covid-19, like Brexit, has revealed strengths and weaknesses in our transport and freight systems, which provide great insights into how we can enhance the sector through the proposed ten-year strategy.

Secure and diverse supply chains

The security, speed, and diversity of Ireland's trade and supply chain network is paramount. For Ireland to remain competitive, businesses need to be able to import and export product with ease and efficiency. And as supply chains become more complex and global in scope, it is vital Ireland has the resources to manage issues as they arise. Supply chains cannot operate without transport, logistic, payment, financial and ICT services, among others. Hence, Ireland should promote an EU trade agenda that remains ambitious, covering all aspects of trade, multilateral, regional and bilateral.

Border procedures

By facilitating procedures and ensuring transparency at the border, Government can help Irish supply chains to be more resilient. This can be achieved by assessing transport, logistics and border process regulations to keep transport moving where there are shocks and ensuring that logistics and the services that support them stay operational. Clear, coherent, and timely guidance for border-measures and procedures and transparency for business are particularly important in a rapidly changing policy landscape. The European Commission's Green Lanes Communication and the subsequent daily engagement with member states (including the Department of Transport in Ireland's case) is a successful example that can be used as a template. Increased use of digital technologies and standardised paperless procedures (for both customs and SPS certification) can help protect people during pandemics by avoiding physical contact, but also alleviate staffing shortages and enable authorities to focus on high-risk products and the full enforcement of import controls. Progress made on this during the pandemic should be continued.

Trade infrastructure

Encouraging investment in trade infrastructure is key to ensuring that companies can switch the means of transport, reduce bottlenecks, and move products to customers. There are trade benefits in strengthening investment in transport infrastructure, and the positive effects this brings to supply chain resilience. For a green recovery from Covid-19, climate resilient, low emission and energy efficient investments can produce double dividends for trade resilience and sustainability.

A role for the Government and private sector

The haulage sector is often self-reliant on enterprise development and management of risks within the global supply chain. However, Government has a range of tools at its disposal to promote resilience and business continuity. The sector needs to avail of these supports to operate safely and efficiently, and to ensure such, essential services such as motor tax offices, test centres, driving license services and passport offices, require immediate Government support to provide adequate assistance. The need for a Business Continuity type

approach in terms of haulage and connectivity is needed. All approaches have costs and benefits. Government's options come with varying context and trade-offs, and one consistent message is that 'resilient global supply chains require co-operation' – public and private sector, government, and citizens, across countries.

The European Commission's Green Lanes Communication and the subsequent daily engagement with member states (including DoT in Ireland's case) is a successful example that can be used again. Increased use of digital technologies and standardised paperless procedures (for both customs and SPS certification) can help protect people during pandemics by avoiding physical contact, and also alleviate staffing shortages and enable authorities to focus on high-risk products and the full enforcement of import controls. Progress made on this during the pandemic should be continued. It is important to take on board evidence from the OECD that shortening of supply chains in most cases does not necessarily equate with security of supply. Ibec strongly believes, along with key European and international business partners, that the optimal path to achieving resilience should be through diversification of supply chains.

2. Brexit

Brexit has had major ramifications for the haulage industry. The completion of the EU-UK Trade and Cooperation Agreement (TCA) was welcomed by Ibec compared to the consequences of a 'no deal' scenario. However, we must recognise that unlike traditional free trade agreements, the TCA is about managing divergence rather than moving closer together. Given our close economic ties with our nearest neighbour, Britain, the impact on Irish business, our supply chains, and east-west trade is unique among our EU partners in its magnitude regardless of the agreement's scale. The TCA is imperfect. However, it does provide a platform for positive relations and a fresh opportunity to address shared economic challenges.

Customs procedures for imports

The EU's introduction of customs procedures for imports from Britain from 1 January 2021 has caused serious disruption to supply chains from Britain, and to and from Ireland and the European continent, including direct routes and via the Britain landbridge. This has also heavily impacted trade with the rest of the world via distribution hubs in Britain.

Trading conditions are now very different, involving complex customs procedures for imports. In the opening quarter of 2021, these posed daily difficulties and delays to our members as they, together with customs officials, digested the specificities of the new EU-UK relationship in the absence of the promised transition period for business, eroded by protracted negotiations. Teething problems continue with customs controls, in particular for SMEs, on which we are working closely and positively with the Revenue Commissioners. In the coming months we expect these systems will be challenged further when trade volumes rise as Covid-19 measures are adjusted, notwithstanding the challenges for exports as the UK gradually introduces its own customs controls from 1 October 2021 – the effective beginning of Brexit for Irish exporters, as currently envisaged. The more that can be done to streamline landbridge haulage, and to level the playing field between RoI and NI ports, the better.

Customs procedures for exports

A pragmatic and flexible approach will be needed in the months ahead with the authorities and business working together to address these issues. Government must work to ensure that businesses are aware of the changes for exports from 1 October 2021 and that sufficient training is provided, notably for SMEs. Furthermore, it is critical that Government agencies, notably the Revenue Commissioners, dedicate sufficient staff to enable business to engage when problems arise to address them quickly akin to the early months of 2021. Given the intention of Dublin Port to extend the operating hours outside normal business, round-the-clock technical support will increasingly be needed for the digitalized optimization of imports and exports.

We welcome the positive and constructive efforts of the Revenue Commissioners and HMRC to collaborate and work with business for mutual benefit. It is important that the close cooperation between customs authorities continue into the future, notably to ensure the lessons learned from the enforcement of full import controls in Ireland, as part of the EU, from 1 January 2021 are shared with HMRC. This will help to avoid the same issues for Irish exporters as the UK gradually introduces its Border Operating Model. In addition, it is important that this relationship works to facilitate transit via Irish ports of goods from Northern Ireland to Britain.

Connectivity to the EU Single Market

Connectivity to the continental markets must continue to be developed by ensuring sufficient accompanied roll on / roll off capacity for direct ferry routes to the continent whilst recognising the strategic importance of the Britain landbridge route. The latter provides additional flexibility for exporters/importers, shorter journey times particularly for perishable products and alternative routes in the event of bad weather.

Rules of Origin

Given our geographical location the Rules of Origin provisions of the TCA present unprecedented challenges for Irish business. We understand these limitations are caused, in part, by the UK's sought divergences. However, there must be a pragmatic and solution-orientated approach when an EU agreement with a major trading partner has such adverse and singular consequences on a single EU member state. While customs procedures including customs warehouses, transit arrangements and returned goods relief may avoid the imposition of tariffs on EU origin goods on import to Ireland, these are costly and complex. This is a significant challenge for all using distribution hubs in Britain, including manufacturers and retailers, in sectors such as food and drink, pharmaceuticals and medicines, and clothing. For some, especially SMEs, it may simply not be viable to continue to use this important route to the Irish market.

SPS/veterinary arrangements

It is important that the EU and the UK reach sanitary and phytosanitary (SPS)/veterinary arrangements based on mutual trust to facilitate the smooth flow of trade from Britain to Northern Ireland and from the EU, including Ireland, to GB from 1 October 2021. After this date, EU exporters will face the same customs processes as EU importers, including pre-notification for products of animal origin, certain animal by products, and high-risk food not of animal origin, and export health certificates for products of animal origin and certain animal by products.

Diminished haulage rights

The UK's departure from the EU Single Road Haulage Market has diminished the access rights of Irish haulage operators in the UK. Importantly, the TCA enables hauliers to operate between the UK and EU and to transit through UK and EU territory. However, operators between the UK and the EU have restrictions such as fewer cabotage rights. The TCA provides for quota-free point-to-point access for operators between the EU and the UK. The same rights are conferred to EU hauliers travelling from the EU to the UK, and back from the UK to the EU. However, EU companies cannot perform transport services within the UK beyond two additional operations once they have crossed the border.

EU-UK Partnership Council

It is welcomed that the first meeting of the EU-UK Partnership Council has taken place and it is expected that the specialised committees will commence meetings in the Autumn. This is important for business that the Partnership Council meets regularly and becomes the central body to address disputes, assist implementation, and build on the foundations of the TCA. In particular, the Specialised Committee on Road Transport will be crucial to ensuring improvements and an evolution in EU-UK relations on road haulage to enable greater, and simplified access for Irish operators to Britain. In support of this, it is vital these bodies are functional as soon as possible and that Irish businesses are well represented in the Civil Society Forum and other relevant bodies under the TCA.

Northern Ireland

We welcome that the TCA takes account of the unique geographical situation on the island of Ireland, including for road transport by including special provisions to allow Northern Irish hauliers to perform two cabotage operations in Ireland. The EU and UK must work together to address any arising issues in the spirit of this mandate and to implement the Protocol on Ireland and Northern Ireland.

EU citizens' and workers' rights

The UK's departure from the EU has resulted in diminished rights for EU nationals, with the exception of Irish citizens whose rights are unaffected under the Protocol on Ireland / Northern which protects the Common Travel Area. It is vital that the EU and the UK work together to ensure that EU nationals receive the necessary visas and documentation for to facilitate haulage operations in the UK.

3. Environment and decarbonisation

Overview

In 2021, Ireland's climate ambition and wider environmental commitments will increase significantly because of the European Green Deal, the 2021 Climate Amendment Bill and the 2020 Programme for Government. Ireland will now be targeting 51% emissions reduction by 2030, and net zero emissions by 2050. This increase in ambition reflects a greater understanding of the threat posed by climate change, the poor progress to date, and the closing window for an effective response. Ireland is also targeting ambitious air quality improvements through the revised EU National Emission Ceilings Directive (NECD). As a significant emitter of CO₂, Particulate Matter (PM_{2.5}), and Nitrogen Oxides (NO_x), Ireland's road haulage sector has a vital role to play in national efforts to meet these targets. New policy interventions will be needed to support the transformation of the sector and promote efficiency upgrades, fuel switching and modal shift.

Decarbonisation in this sector will not be easy and expectations of what can be achieved in the near term need to be carefully managed. This may be one of the last sectors to fully decarbonise. While electrification is fast emerging as the default alternative for light commercial vehicles, the options for HGVs are more limited. High up-front costs, long payback terms, mixed technology readiness levels, and regulatory uncertainty have all helped keep diesel as the primary HGV fuel. And with several competing technologies being tabled, there is much uncertainty in the sector as to what the future might look like. It is vital that Government provide leadership and develop smart policies to help businesses navigate this uncertainty. Greater leadership and direction are also needed to prevent a cannibalisation affect where state investment and policy is undermining uptake of other working solutions. The National Haulage Strategy, together with Climate Action Plan 2021, Budget 2022, and the NDP Review all provide an opportunity to help address these issues and build momentum in the sector.

Data and insights

The consultation document provides an accurate analysis of the unique challenges ahead for the sector and possible solutions as it transitions away from fossil fuels. However, Ibec notes that significant research has already been undertaken in this area. In 2019, Transport Infrastructure Ireland (TII) and the Department of Transport (DoT) commissioned Arup to research the decarbonisation options for road freight. The research included detailed workshops and interviews with key stakeholders across government, academia, industry, and the haulage sector. A final report was published in November 2020. Ibec participated and contributed to this work. It is unclear why this report was not referenced or used as part of this consultation. The insights from this research should be integrated into the final strategy.

The electrification of light vehicles

Ibec notes that the Marginal Abatement Cost Curve that accompanied the 2019 Climate Action Plan identified electrification of commercial transport as one of the most cost effective/value for money mitigation options available to the State. The current array of State supports, the revised VRT rules, falling technology costs, the ongoing build-out of the national charging network, and an arising carbon tax will help increase uptake rates in the coming years. These measures are already beginning to work with many businesses making the move to electric. However, the lack of a dynamic used-vehicle market remains a key barrier which only time will resolve. It is important that the supports and incentives for EVs are not removed too early as there is still a premium on EV vehicles.

Gasification of transport

The gasification of transport is one possible solution to address the HGV challenge. Compressed Natural Gas (CNG) is an alternative for this vehicle class and has lower CO₂ and air pollutants than diesel options, which is an important consideration for urban areas. However, the cost differential remains a disincentive for many businesses. Ibec welcomes the new Department of Transport low emission vehicle grant scheme and the Gas Networks Ireland grant scheme to help address some of this cost difference.

The development of an accessible CNG refuelling infrastructure through Gas Networks Ireland's Causeway Project will also help address access issues. For off-grid areas like the Northwest, LPG and Bio-LPG are alternative solutions. Ibec notes the role of the Irish Maritime Safety Directorate in ensuring the safe importation of such fuels.

Biofuels

Renewable biofuels remain the main driver of transport decarbonisation in our economy today and an obvious solution for hard to mitigate sectors like road freight. The Biofuel Obligation Scheme has proved to be a great success, removing millions of litres of petrol and diesel from the market each year, largely unnoticed by end consumers. Like with centralised district heating, the appeal of biofuels is that they offer a relatively low resistance path to decarbonisation without relying on large volumes of individual consumer decisions or investments. However, the sector is approaching technical limits as the blending obligation increases. There is an opportunity for Ireland to produce/use more advanced biofuels that do not face the same technical barriers as Fatty Acid Methyl Ester (FAME). These include Hydrotreated Vegetable Oil (HVO) or Hydrotreated Renewable Diesel (HDRD). The deployment of such fuels requires strong investment signals from Government that there will be a market for such fuels in the medium to long term.

Hydrogen

Hydrogen powered vehicles are another credible option for the HGV sector with the possibility to produce hydrogen from indigenous renewable generation. The EU has proposed ambitious hydrogen targets. As with other technologies, supports will be required to stimulate the industry and overcome significant costs. Further research will be required to investigate how to reduce deployment costs.

Modal shift in freight

A thorough analysis of the potential expansion of rail freight should be carried out. Ireland's heavy rail network offers an opportunity to reduce road freight emissions and road congestion. A 2016 study by the UK's Department of Transport found that 'each tonne of freight transported by rail reduces carbon emissions by 76% compared to road and each freight train removes 43 to 76 lorries from the roads'. Ireland's heavy rail network is underutilised. Rail freight only accounts for 0.4% of total freight tonnage in Ireland, compared to an EU 28 average of 17.4%. Ireland's heavy rail network is ideally suited to transporting ISO tanks, containers, bulk freight materials like mineral ores, biomass, and timber. The lines between Ballina and Dublin Port, and Waterford Port give a direct connection with maritime traffic. However, in view of the recent closure of rail handling for unitised freight at Dublin Port, the scope for modal switch may be limited.

4. Labour Market/Skills

Following decades of under-investment in transport infrastructure, industry specific developments and reliance on workers from Eastern Europe and beyond, the sector is facing shortages which threaten to impede economic growth. There is a skills gap, highlighted as a priority issue by Ibec members. The shortage of HGV drivers is growing both in Ireland and across Europe. The sector is contending with an ageing labour force in which the average age of a professional driver in Europe stands at around 50 years. The cost associated with the training and licensing of an HGV driver in Ireland is putting financial strains on businesses and discourages the young workforce from pursuing a career in the sector. Already existing support frameworks can extend further and provide even more sector specific support. 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. To address the emerging labour shortages, the focus of existing support frameworks needs to be revisited. Haulage companies need structural support, and the haulage strategy needs to put measures to address these sector wide issues in a strategic manner.

Training and upskilling

To address labour shortages and enhance the skills base of the existing workforce, Ireland needs to develop a world class training system for the haulage sector. The first challenge is to better understand these gaps and the new and emerging skills required of future drivers. The new strategy should progress new research in these areas through the EGFSN and regional skills fora. Ibec believes many of the skills challenges the sector faces can be resolved through existing training platforms. For example, the current model of subsidized electrician-based apprenticeships is effectively enticing early school leavers and Level 6 learners. The haulage sector fails to attract a younger workforce due to high costs associated with training and licensing.

Demand for haulage services is growing and the associated paperwork skills are becoming more complex. The sector struggles to deliver without Government support. The responsibility of employee upskilling often falls onto the shoulders of private enterprises. Given how essential the work of the sector is, in particular HGV drivers, Ibec recommends that Government should not only support private enterprises and SMEs in training and upskilling, but also that already existing business-established training programmes receive cross board accreditation to foster industry loyalty and employability. Government and industry should work together to ensure the cost of licence acquisition is not a barrier to new entrants. This implies the need for regional networks of high-quality affordable driver training and accreditation establishments.

Training Costs

The current cost associated with training and licencing a HGV driver in Ireland is one of the highest in Europe, and the sector needs immediate Government support. Training grants and state subsidised courses would assist in encouraging haulage operators to invest and to remove the burden of the costs relating to business run training courses and qualifications. Development of training centres to supplement and facilitate on-the-job training to support businesses who do not have the capacity to provide in-house training is needed. Establishing more forums for industry feedback on the development of such training programmes is vital and we encourage further dialogue between the industry and Government.

Younger drivers tend to attract higher insurance cost and for very young drivers it can be very difficult to get insurance at all. This is outside of the scope of the current consultation although it should be noted that Ibec has been actively lobbying to bring down the cost of liability insurance by reducing the cost of injury claims.

Government should offer more state sponsored training to shift the training and licensing cost burden from the businesses, while involving the businesses in those training programmes, to ensure supply chain growth and cooperation. Ibec encourages the Department of Further and Higher Education, Research, Innovation and Science to work with haulage company owners and freight forwarders to gain invaluable input which can assist in the much-needed reform to programmes such as the CPC.

Industry Perception

HGV drivers have been viewed favourably during Covid-19 as providing a resilient service. They should no longer be viewed as a 'yellow pack' commodity. The haulage industry is perceived as male dominated and unsuitable for women. Government must change the perception by changing the reality. There is no reason for women not to be able to pursue successful careers in the sector. Government should actively encourage an improved gender balance.

These changes can be brought about when the industry is efficiently supported. To change industry perceptions, both educational and media wide campaigns are needed. Through the means of education, the public can develop an understanding into the importance of the sector in the national supply chain and develop an understanding of a wide range of professional careers available. Given how Covid-19 affected youth unemployment throughout Europe, the industry should have a potential talent pool waiting to be trained.

Employment Permits for Non-European HGV Drivers

Ireland operates a managed employment permit system through occupation lists, namely the Critical Skills List and Ineligible List, which are reviewed twice a year. Brexit and Covid-19 have been reflective of how the sector continues to grow due to changes in consumer purchasing patterns. The already existing labour challenges, which are a combination of factors, such as improving economies in Eastern Europe, have also impacted the sector. Ibec understands that HGV drivers and HGV mechanics may not constitute critical skills within the Department of Enterprise framework, but there is a dangerous shortage of these skills. The Department should therefore consider a further increase in the ceiling of non-EU nationals.

Apprenticeships

The need for high-quality apprenticeships for the Irish economy is clear. Apprenticeships offer a valuable combination of high quality academic and vocational learning, with clear links to a profession and employment. Industry-led apprenticeships and employer engagement is essential in the design and delivery of apprenticeships, as employers are best placed to recognise the current and future skills and training needs of their sectors. The fluidity of the employment market is negatively impacting haulage employers, given competitive salaries and lack of employee loyalty.

Ibec welcomes the Apprenticeship Action Plan 2021 – 2025 and the National Skills Strategy 2025. 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 sector and their skills, needs to be supported further by Government.

There is strong evidence that the cost of paying a salary and subsistence while the apprenticeship is off-the-job has become a major disincentive. A major obstacle to the expansion of new apprenticeships, particularly amongst SMEs, is cost. The availability of in-company trainers is often limited. SMEs may rely on senior workers to provide training as an additional task on top of their existing duties. Developing the internal training capacity of businesses and the quality of training that they provide, would give businesses the tools to engage in apprenticeships and other forms of lifelong learning and professional development crucial for boosting

business productivity and skills-based economic development. Establishing more forums for industry feedback on the development of sector specific training programmes is vital and Ibec encourages further dialogue between the haulage industry and Government.

The need for high-quality apprenticeships for the economy is clear, and broadening apprenticeships for the haulage sector requires immediate Government attention. The apprenticeship system needs to realise its full potential and build a more inclusive and dynamic culture where apprenticeship can support business development and link enterprise and education together. The current system is hamstrung in its ability to achieve due to the existing governance and legislative measures. The governance model of apprenticeships creates prohibitive red tape for employers interested in engaging, while the funding model does not support parity between old and new apprenticeships or recognise the full cost of engaging in apprenticeships for businesses.

Ibec recommends:

- The Apprenticeship Incentivisation Scheme needs to be developed and funded further to support entry levels into the haulage industry and to accommodate Level 6 learners and early school leavers.
- The National Training Fund should support the acceleration and implementation of new apprenticeships, such as HGV driving courses, and cover the training allowance. The National Training Fund should also cover apprenticeship training allowance for first two years of each Generation Apprentice programme.
- The Apprenticeship Council must be awarded more independence, oversight, and control to discuss and direct matters of serious interest to the apprenticeship system.
- The dual roles of SOLAS must be reconsidered to focus on accelerating all apprenticeship programmes.
- The provisions under the Action Plan for Apprenticeship 2021–2025, on existing female bursary schemes, must be extended and developed further to promote greater female participation in courses/apprenticeships related to the haulage sector.
- The Employment Wage Subsidy Scheme and the Apprenticeship Incentive Scheme should be maintained and extended until the NTF allocation for enterprise wage supports are approved and operational.

5. Road Infrastructure

Road freight remains the primary method of transporting freight across the country. Brexit and Covid-19 have reinforced the importance of the road network for transport, given the reliance on road freight for imports and exports. Connectivity and accessibility will be more important than ever to minimise the potential damaging impacts of these dual challenges. Government must prioritise investment in critical road infrastructure projects to improve access to markets and services and create linkages to key transport networks and corridors. The widening infrastructure gap, as growth in demand outstrips investment infrastructure, is contributing to growing national and regional disparities.

Facilities

The HSE's public health advice is very clear to all workers and citizens; following good hygiene and hand washing practices is essential for limiting the spread of COVID-19.¹ Those working in the haulage industry do not always have access to toilet and handwashing facilities. During nationwide lockdowns, the access to already limited facilities became even more restricted. All transport workers should have access to basic sanitary facilities, and Government should encourage service station operators accordingly.

National Road Network

Public investment in transport infrastructure has failed to keep pace with the growth in demand. Investment in infrastructure in the regions that enhances inter-urban connectivity and accessibility is more important than ever. Roads are the major arteries that allow freight to move around the country, facilitating vital trade. A well-connected high quality inter-regional and intra-regional road network will be central in supporting our national supply chain. Any shortcoming in regional transport infrastructure could hinder investment and job creation, thereby reinforcing the perception of a two-tier economy.

In Ireland, numerous roads and populous areas do not have an appropriate infrastructure for HGV vehicles. Increased provision should be made to support the maintenance and development of the road networks for the haulage sector. Poorly maintained roads have a significant impact on competitiveness, in the form of increased journey times and capital overheads. Accelerated delivery of critical transport infrastructure projects will be crucial for the haulage sector and for effective regional development. Delivery timelines for all projects should be reduced by up to 50%. The delivery of projects essential for regional growth must not be unnecessarily held back due to public procurement procedural issues or problems within the planning system. Ireland's dairy industry and forestry sector are significant users of haulage and their logistics typically require HGVs travelling in rural areas where the road surfaces may not be well maintained. This is unfortunate given their contribution to the economy. Continued delays in the delivery of major national projects, such as the A5 from Derry to Monaghan/Dublin, M20 Cork-Limerick motorway, N25 Cork to Rosslare, have added additional costs to hauliers at local levels. Sufficient funding should be made available to improve and to implement substantial works on the existing national road network incorporating national, regional, and local roads.

Congestion

Road developments remove restrictions on connectivity and growth, resulting in significant positive impacts, including facilitating sustainable modes of travel, and creating a favourable environment for sustainable travel, by removing car and HGV traffic volumes from the city centre. Addressing bottlenecks and traffic congestion in urban centres, will also reduce vehicle emissions and support ambitious climate action and sustainable development commitments.

¹ <https://www.gov.ie/pdf/?file=https://assets.gov.ie/72473/b16cc682358b492689f29fd809ad7314.pdf#page=1> accessed via <https://www.gov.ie/en/publication/ed29dc-irelands-response-to-covid-19-transport-measures/>

Traffic congestion generates uncertainty about travel times which impacts the national supply chain. From the perspective of hauliers, there are the day-to-day cost implications associated with congestion, such as risks and returns associated with location, production, and distribution. The current levels of congestion, particularly in urban areas, greatly complicate any tight scheduling of freight activities during the day and creates delays, uncertainties, and costs implications. For example, Dublin was the 20th most congested city in the world according to the INRIX 2020 Global Traffic Scorecard, spending 66 hours in gridlock.² This ultimately applies an extra cost to the goods that are imported and exported.

Alleviating congestion by investing in intra-regional and inter-regional road upgrades and the diversion of some trips to other modes will help to ensure the reliable and efficient movement of imports and exports. Daytime congestions could also be reduced by time-based road pricing for HGV drivers, to promote more overnight traffic. This can be implemented on a cost-neutral basis by the operators – tariff reductions at night being fully offset by higher daytime prices.

Last-Mile Delivery

Covid-19 put further strains on daily services and accessibility within urban and rural centres. The changing consumption patterns of recently reopened economic sectors, is continually driving the demand for timed deliveries.

Efficient last-mile delivery is essential not only to the haulage sector, but also to the recently reopened hospitality sector. Whilst initiatives such as the pedestrianisation of city centre streets has been successful in increasing footfall, accessibility requirements for businesses must be taken into consideration. Any changes to city centres have knock-on impacts on businesses' abilities to deliver effectively.

Where suitable, consolidation around 'final-mile' B2C is required from all stakeholders, including Government and businesses. Adequate planning for large vehicle access for pallet deliveries to retail outlets and shopping centres is crucial in ensuring timed deliveries of essential goods. Ibec encourages the creation of sector wide forums, through which stakeholders can engage in conversation centred around efficient standards of delivery practice with relevant national planning authorities and industry.

Local authorities need to work together with the sector to develop adequate urban hubs and infrastructure for efficient last-mile deliveries in both urban and rural centres. The sector has shown leadership in the development of eco-friendly infrastructure, eco-hubs, and e-cycles, and if supported can innovate further. Given how diverse the sector is, various businesses within the industry have different priorities, SMEs, and multi-national operators, and therefore require efficient planning support from local authorities.

Ibec has continued to highlight across our campaigns and submissions, including our *Better Lives Better Business* campaign, the mid-term review of the National Development Plan and the National Investment Framework for Transport in Ireland (NIFTI) that Ireland requires urgent transformative changes to our transport system. Those proposed changes must support a key national sector, hauliers. By supporting the development of regional infrastructure, the government has an opportunity to support just regional transition and make our national supply chain more resilient.

² INRIX Scorecard Dublin <https://inrix.com/scorecard-city/?city=Dublin&index=20>

6. Road Safety

Close cooperation between state authorities responsible for road safety and the haulage industry is vital in improving road safety for all users. 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. Good communication and education initiatives have an important role to play. The resources allocated to the enforcement of road safety within the haulage sector are important. Government should adequately support the RSA through increased funding for increased operational capacity.

Open Communication Forums

To ensure the success of safety regulations, we encourage the RSA to engage with the haulage sector on a frequent basis and we recommend establishing a clearly defined strategy to ensure collaboration. By allowing the haulage sector to relay regular feedback to the authorities, the RSA can further improve national road safety standards for all users. The creation of a dedicated communication channel would allow the haulage sector to effectively communicate any industry concerns directly to the RSA. Communication must be clear, and a willingness to listen to industry is essential. The forum used for such consultation must have trust, transparency, and positive engagement at its core.

Digital Learning Tools

Digitalized training tools are increasingly used across various learning platforms and more online resources for training and education around road safety would be of benefit for both the haulage sector and the RSA. Through the establishment of digital learning platforms, policymakers and regulators can gain a better understanding of the challenges faced by the haulage industry on an ongoing basis. For example, it would enable the RSA to gain invaluable feedback which will not only strengthen the sector cooperation but will also improve road safety standards.

7. Mobility Package

New regulations aim to improve the EU road transport sector by introducing social provisions on driving times and rest conditions of drivers. The regulatory measures of the Mobility Package propose the obligation of regular return of the vehicle to the Member State of operator establishment, maximum work and minimum rest times for drivers and positioning by means of tachographs. Improved working and social conditions for drivers have the potential of retaining and attracting sector wide employment. The regulatory mechanisms of the Mobility Package are assessed by the Commission via cross sectional study and the study findings in the context of the European Green Deal, Sustainable and Smart Mobility Strategy and the functioning of the Single Market going forward.

Education and Engagement

As part of its review strategy, the European Commission intends to open a discussion with Member States, the European Parliament, and stakeholders. In support of this, Ibec urges the Department of Transport to establish a dedicated communication channel with hauliers for EU legislative matters to keep industry members up-to-date and to gather regular feedback for relevant EU consultations. The establishment of such a channel would strengthen Ireland's contributions and foster a greater sense of cross European cooperation via informed national channels. Furthermore, assisting the sector through education and engagement has the potential to enable further engagement with EU institutions, and as a result, ensure that sector-specific positions are well-represented to all relevant actors.

It is important that industry is part of the discussions on the upcoming changes in the EU legislation applicable to the sector. For example, light commercial vehicles (LCVs), which play a central role in last-mile delivery, particularly in urban areas, have been part of the Commissions' impact assessment for the updated CO2 emission performance under the European Green Deal. Further legislative changes can be expected under the emerging Fitfor55 package. Ibec is aware of the EU Roadmap for truck platooning³ but given the spatial distribution of our population centres, we consider that this novel technology would have very limited application in Ireland.

Just Transition

There has not been substantial external support to aid business to enhance their sustainability, digital or climate transitions. Many businesses have taken it upon themselves to attempt the transition, but they would benefit from Government support.

The sector is under increased legislative scrutiny as sustainable practices have been at the heart of policy at all levels. The sector has the potential to undertake the sustainable transformation if assisted effectively. For example, enhanced electronic systems could improve clearance waiting times at ports and improved tachograph systems could further assist in the recording of vehicle data for improved safety and practice standards. Ibec recommends that Government allocate more investment for upgrading and developing national IT infrastructure to support the sector. Just transition takes time and requires patience and understanding at all levels. The Government could enable the sector to obtain EU funding directly via the Just Transition Fund by providing information and funding application assistance.

³ More information on the EU ENSEMBLE Platooning Project <https://platooningensemble.eu/project>
<https://ec.europa.eu/inea/en/horizon-2020/projects/h2020-transport/automated-road-transport/ensemble>

8. 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. Quality road and rail infrastructure must be available to link airports and ports to the national road and rail network. It is vital that hauliers can access ports and airports in a timely manner from anywhere in the country.

Ports

The functionality of our ports is essential for our national supply chain. Most Irish imports and exports move through our ports. Improved inter-urban regional connectivity means ensuring that goods can get to markets securely and efficiently in a timely manner from everywhere in the country, especially to and from our ports. This would enhance the prospects for increased productivity, enterprise development and job creation.

As Dublin Port will reach its ultimate capacity in substantially less than 20 years' time, Government must ensure that the national port system has sufficient capacity to manage the spill over from Dublin in the coming years. Given the country's dependency on Dublin Port, the strategy should support DPC's digitalisation project as a tool to utilise Dublin Port's infrastructure more efficiently and maximise capacity. To effectively support the hauliers and target regional imbalances, immediate action and focus is required.

Road access to our Core TEN-T ports, especially Shannon Foynes and Ringaskiddy, as well as Comprehensive TEN-T ports needs to be improved. Progression and delivery of key infrastructural projects is essential, including an upgrade of the N28 Cork to Ringaskiddy (to motorway standard), of the R264 to Marino Point, N11/N25 Oilgate to Rosslare and N69 Limerick to Foynes. The Shannon Estuary and Shannon Foynes Port Company is well placed to provide the region with substantial growth opportunities in the years ahead, whether by expanding marine freight in the region or facilitating the harnessing of the Atlantic coast's immense renewable energy resources.

Specifically, HGV vehicles must have sufficient access to road infrastructure, therefore it must be managed to ensure that roads are not unnecessarily congested by private cars and that HGV vehicles can therefore operate efficiently. Quality road infrastructure is crucial to Ireland's national port system, as due to geographical constraints the onward transport requirements for the port system will continue to be met primarily through road vehicles. Such realities must be incorporated into the ten-year strategy.

Airports

High-quality access for the haulage sector to our airports is vital to our economy. Our capacity to engage in international connectivity underpins regional economic growth. Failure to prioritise our airports will impair their ability to compete internationally, and its associated role in attracting foreign direct investment.

Air freight in Ireland mainly consists of high value products and short shelf-life products. Enhancing surface access is essential to enable the efficient movement of freight through and to our airports, and existing motorways and regional roads should be prioritised. Crucially, the runway movements at Dublin Airport need to be maintained following the completion of the North Runway. Any night-time restriction could indirectly impact on the movement of goods to and from the airport, in that the collection or delivery times would be more concentrated during peak traffic hours.

To meet the concerns of business in a small, trade-intensive economy adapting to Brexit, national planning frameworks should address the logistical challenges for inbound and outbound transport of freight by air. In this regard, Ibec understands that Shannon Airport envisages a substantial uplift in cargo volumes, with implications for its connectivity to the national road network.

Rail

There is an increased potential for the role of rail freight in addition to road transport. Rail freight currently plays a limited role in Ireland, but 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. There are many environmental and social benefits to be gained from utilising rail to transport goods, including a role in our efforts to cut carbon emissions.

Rail connections in Ireland are underdeveloped and, notably, rail connections between NI and ROI are insufficiently fast and frequent. Improved rail networks would benefit both regional and international connectivity. Rail services have, however, struggled to compete effectively against the convenience and cost of road-based transport options. The Strategic Rail Review will presumably examine the feasibility of reopening long abandoned tracks or developing entirely new ones. This is to be welcomed, provided that the feasibility study does not become an unnecessary hindrance to the urgent and enduring need for improved road investment projects.

The opportunities to strengthen rail freight in some regions is recognised and supported by the Regional Spatial and Economic Strategies (RSEs). There is also potential to re-instate the Limerick-Foynes Freight Line and freight rail linkage to Marino Point in Cork. Upgrades on key inter-city rail routes, including Dublin-Belfast, Limerick Colbert to Limerick Junction and Athenry-Galway are needed.

High-quality access to ports and airports is vital to our economy and will play a central role in the growth of the haulage sector. Equally, the future attractiveness of regions for investment will depend on an efficient transport network, and indeed our international connectivity. Ibec's submission to the NPF, the RSEs and the Mid-Term Review of the National Development Plan all acknowledge the potential of rail transport as a core component of improved inter-regional connectivity. As electrification of the network progresses, it can also help to reduce the carbon footprint of the transport sector, which has been growing in step with our population and economic activity.



About Ibec

Ibec is Ireland's largest lobby group and business representative. We campaign for real changes to the policies that matter most to business. Policy is shaped by our diverse membership, who are home grown, multinational, big and small and employ 70% of the private sector workforce in Ireland. With 36 trade associations covering a range of industry sectors, 6 offices around Ireland as well as an office in Brussels. With over 240 employees, Ibec communicates the Irish business voice to key stakeholders at home and abroad. Ibec also provides a wide range of professional services and management training to members on all aspects of human resource management, occupational health and safety, employee relations and employment law.

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IEA Submission: Ten-year Strategy for the Road Haulage Sector

*Irish Exporters Association submission to the Department of
Transport*

15 July 2021

Overview: The Irish Exporters Association

The Irish Exporters Association (IEA) is the leading independent representative body and voice for exporters based in Ireland. The IEA represents exporters and supply chain operators across the country and works at regional, national, and European level, representing its members in front of legislators to create a regulatory and legislative framework that supports, drives, and fosters Irish exports.

We assist our members to grow their exports to world markets and drive the growth and development of all exporting businesses based in Ireland. We provide a set of highly relevant business services and products to assist our members with international trade.

- We **represent** the needs of members in the development of policy, lobbying, intervention at Government and EU level and in the media. Brexit and the Diversification of Export Markets, Trade Compliance, Climate Change & Sustainability, and their impact on Irish exporters are core to our work.
- We offer **trade services** in the form of practical training, support, and advice right across the supply chain including our Certificate in International Trade, customs awareness, GDP, export and import compliance, Sustainable Supply Chain programme consular, business travel support (visa and export documentation), route to market and general assistance with trade related queries.
- We have created **knowledge networks** among our membership to support our members in exploring new markets, route to market scenario planning, understand customs and supply chain challenges and provide thought leadership through a series of events and webinars. Networking and connectivity remain an important part of membership benefits. Our Export Industry Awards programme is our flagship event that celebrates the achievements of exporting companies and highlights the importance of the export sector to Ireland.

The IEA represents the whole spectrum of companies within the export industry including SME's who are beginning to think about exporting for the first time right through to global multinational companies who are already extensively exporting from Ireland as well as the providers of key services to the sector. The IEA is the connecting force for Irish exporters, providing practical knowledge and support across the Island of Ireland and in foreign markets.

Introduction

We welcome the Department's initiative in developing a ten-year strategy for the road haulage sector and appreciate the opportunity to contribute the views of IEA members to this consultation. We would like to acknowledge and commend the work of Minister Hildegard Naughton TD in her efforts to highlight the importance of the sector and bring forward the publishing a robust and modern strategy for this key sector of the Irish economy. Our submission is drafted in cooperation with our members, particularly those in the transport and logistics space as they are well placed to feed into the ten-year strategy. We posed six questions to members on the topics of Covid-19, Brexit, decarbonisation, road safety and skills and collated them into this submission.

Q1. 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?

Q2. How do you see the EU-UK relationship in road haulage under the EU-UK Trade and Cooperation Agreement evolving over time and what further actions are needed at present to help the sector adapt to changes due to Brexit?

Q3. What are your views on decarbonising the road haulage sector in line with Government ambitions to achieve a carbon neutral economy by 2050 and what is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

Q4. What are the road safety priorities in road haulage for the next 10 years?

Q5. 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?

Q6. Additional comments on what you think should be included in the ten-year strategy for the road haulage sector:

We understand that decarbonising the sector and addressing an acute skills shortage are two key areas that the strategy must address. Members are aware of their climate action obligations and indeed that such obligations will intensify over the coming years as the country strives towards reaching the aim of carbon neutrality by 2050. We would like to highlight that the very nature of trade means that exporters are in fact also importers and that if anything, Covid-19 and Brexit have impacted the import side of members businesses perhaps more strongly than the export side. This needs to be considered in this strategy.

We wish to acknowledge the number of members in the transport and logistics sector that have and continue to adapt operations to ensure that their activities are in line with climate objectives. We remain available to work with policymakers and officials from across the Departments to come forward with a fitting strategy that our members can instil into their operations and indeed that the wider exporting and importing community take account of when utilising the supply chain.

IEA Recommendations

Covid-19

Q1. 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?

The outbreak of Covid-19 in 2020 and the restrictions imposed to curb its spread in China was quickly felt by Irish exporters and supply chain operators who were met with obstacles when using ports and routes to and in the region. As early as 15 February 2020, this Association called on the [Government to consider putting in place supports for Irish businesses that were suffering as a result of Covid-19 and highlighted difficulties in moving goods between and Ireland](#). In the case of Covid-19, initial disruption in the supply chain was a major signal of things to come, particularly the disruption that would ensue. Actors in the supply chain from manufacturers, drivers to port operators and all actors in between were acutely aware of how the virus was disrupting the established order of freight movements and indeed the ensuing economic and social impacts. This has exposed the particular sensitivity of supply chains and how this can act as a signal of issues to come.

Future-proofing the supply chain was cited as a major learning for members. In that regard it was mentioned that training drivers, bringing forward incentive schemes and contingency planning should form part of plans to ensure that supply chains are robust enough to withstand future shocks. Overall, logistics performed well in without much overall upset despite the pandemic, aside from international border closures. Given the learnings that have taken place, as part of the ten-year strategy the Department may consider developing a blueprint on how the sector should operate during a pandemic.

The pandemic exposed the geographical constraints associated with being an island nation. Ireland's interconnectivity with mainland Europe for road haulage and the dependency on existing ferry routes and operators in the absence of air freight options was evident. The fact that we are on the edge of Europe without a land link was as a major disadvantage during the pandemic. Efforts in the shipping industry to come forward with increasing ferry routes and carriers considering Brexit has been a major plus for exporters and importers. We will address this further in the Brexit section of this submission. We believe that there remains an additional need for storage and warehousing facilities to support and strengthen trade links and routes. Operators continue to experience an increase in costs associated with shipping.

In terms of air freight, we have highlighted our concerns about the impact of the pandemic on Ireland's overall global trade connectivity. As necessary restrictions on international travel came into force for passengers, this in turn reduced the sector's ability to transport goods, which are often high-added value, to world markets. Ireland has a global reputation as a well-placed destination for businesses to set up and operate from. Our connectivity and location play a huge part in businesses deciding to locate here. Any diminishing of routes to world markets would damage this reputation. Supply chains are complex and deeply interconnected. An action or change in one part of the chain will ultimately impact another. Ireland's air connectivity, and shipping routes, play an important part in the development of Ireland's road haulage sector and will drive the future prosperity of the sector.

The health and safety of essential supply chain workers is an area that learnings can be taken from. Throughout the pandemic, and even before the virus came to Irish shores,

supply chain workers kept trade moving in and out of Ireland. In the event of a similar situation occurring again in the future, we urge supply chain workers to be given the medical protections needed to carry out their work. This may involve ensuring that supply chain workers are vaccinated given they are essential. The ability to provide for changing of ship's crews has been a global issue and the welfare of the seafarers has come way down the priority list for the EU. We call on the Department to ensure that the ten-year strategy for the sector addresses the health and safety issues that have arisen during the pandemic for road haulage workers and workers in the wider supply chain.

Brexit

Q2. How do you see the EU-UK relationship in road haulage under the EU-UK Trade and Cooperation Agreement evolving over time and what further actions are needed at present to help the sector adapt to changes due to Brexit?

IEA members put processes in place in advance of 1 January 2021 to ensure that operations could work and that trade would flow as smooth as possible in the aftermath of the United Kingdom (UK) exiting the EU. Road haulage operators cite that customs paperwork and the imposition of tariffs on certain goods is delaying the flow of goods. While operators are getting up to speed on the new formalities, we expect that as trade volumes increase post-Brexit and post-Covid-19, there will be a need for schemes such as the Enterprise Ireland Ready for Customs Grant to support companies with processing increased volumes of paperwork.

The continued opening of an increased number of shipping routes to the continent has been a major benefit for exporters and importers that choose to avoid customs paperwork. In terms of moving goods directly to the EU, Members believe that the sector needs to continue a gradual switch to unaccompanied freight for a larger part of the volumes. Although members have raised concerns about the increased transport costs associated with using direct shipping routes to the continent. With shipping costs on the rise and as companies become more *au fait* with the necessary paperwork involved with transiting goods through Great Britain, we expect that overtime there could well be a degree of movement back to using the landbridge particularly for companies in the food and drink sector.

The UK landridge is perceived as an unfavourable route to transit goods given delays and available options to avoid such paperwork by shipping goods directly to the EU market. Members cite that those delays faced by haulage operators using the landbridge is causing a nervousness for drivers to operate the IE-UK route, choosing to bypass the UK where possible, which could result in reduced driver capacity going forward.

Decarbonisation

Q3. What are your views on decarbonising the road haulage sector in line with Government ambitions to achieve a carbon neutral economy by 2050 and what is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

A key policy priority for the IEA is sustainable trade and investment. We welcome the Department's initiative to address the decarbonisation of the sector through the ten-year strategy. We believe that we have a responsibility to communicate the aims of the EU Green Deal and the Climate Action Bill to our members and to support exporters, importers, and supply chain actors by informing them of practices they will have to integrate into their operations to contribute to achieving the 2050 national target of climate neutrality and

indeed the target of reducing emissions by 51% by 2030. Achieving both aims requires buy-in from all sections of society. We are committed to supporting our members in achieving climate targets and look forward to the publication of the 2021 Climate Action Plan.

With 20% of Ireland's greenhouse gas emissions coming from the transport sector, changes must be brought into curb emissions from the multimodal transport sector. Hauliers should be incentivised to use the shortest route by road. Therefore, the ability to use our seaports to have cargo arrive/depart closer to the destination/origin is crucial. From this point a switch to either CNG, LNG or electric from port to the unload/load point and a further switch to electric or another mode than road for last mile delivery. Members believe that speeding up infrastructure for EVs and gas-powered vehicles is needed.

Members cited that financial incentives must be put in place to increase the uptake of more carbon neutral trucks. Companies have heavily invested in their respective fleets and may be unable to overhaul current fleets to fit with Government climate aims and ambitions. The establishment of a scrappage scheme for older vehicles may go some way in encouraging the move away from older fleets. Incentives to invest in new technology through financial loans or grant schemes to provide plug-in points for HGV's should be considered as part of this strategy. A review of motor tax and how it takes account of efforts to curb emissions is another area that the Department may consider.

There are doubts about whether technology has provided solutions for the real-world requirements of HGV's re; power and distance and therefore operators believe that more research is needed. Wider options exist such as using hydrogen fuel cells as the long-haul option. We believe that the sector needs to be informed of alternative options to current fleets and informed of the benefits that switching would have to the robustness of their business going forward and to ensure that operators make investments that they can trust and rely on.

Road Safety

Q4. What are the road safety priorities in road haulage for the next 10 years?

Maintaining a high level of road safety is a key priority by IEA members and achieving this through the continued improvement of road infrastructure, better planning, and consideration to the delivery element/facilities, educating all road users about the dangers of driving too close to HGVs, particularly when they are turning left and ensuring extra visibility for drovers to see vulnerable road users. The separation of road space is a key safety factor and consideration for improving road safety as part of the ten-year strategy for the road haulage sector and preventing HGV's from entering small towns/villages where there is another alternative route. Bringing in more separated road space for vulnerable road users such as cyclists on regional / national route is another way of improving road safety. Members also cite that reducing the volume of single occupant vehicles through improved transport infrastructure is another way to improve road safety and allocate dedicated areas – loading bays etc – to HGVs. Related to safety is the issue of establishing more laybys on motorways and safe parking enclosures for trucks. Many carry high value loads and need to be able to park securely, particularly at night.

Skills

Q5. 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?

Shortages in labour for the road haulage sector, particularly in the early stage of autonomous vehicles, is an issue that intensified over the past number of years and if not addressed, will limit the sector's ability to move goods on and off the island, which will ultimately impact Ireland's attractiveness to businesses. IEA members believe that the establishment of a national apprentice programme is one practical step that could be taken as part of the Government's ten-year strategy for the sector and would contribute to ensuring that workers receive sufficient remuneration for carrying out this essential work. We have concerns about the level of insurance premiums being demanded for younger drivers, which may be a barrier for younger drivers coming on stream. Rolling out cost-effective and/or subsidised training programmes would go some way to attracting workers.

We encourage the department to engage in a campaign that increases both the visibility and the attractiveness of working in the sector – a greater professionalisation of the role is key to attracting young people to the sector. Members firmly believe that the many aspects associated with working in the sector need to be highlighted including the innovation in the sector, the importance and essentialness of the sector to Ireland's open trading economy and the ongoing work on modernising fleets and ensuing supply chains are sustainable and operate in line with international and national climate objectives. Aside from attracting drivers, there is a need for drivers with specialist qualifications including ADR, which is required for the carriage of dangerous goods, something that is a feature of some pharma and food and drink manufacture businesses. The availability of such specialist drivers is a consideration to make considering Ireland's foreign direct investment model.

Members cite that changes in consumer preferences and expectations, which have escalated during the pandemic, feed into the overall attractiveness of working in the sector. Given that there will be an increasing need for night-time and weekend working, especially as the port sector is pressed for space and needs to expand its operating hours into nights/weekends, the need to work during 'social hours' will continue and will impact the draw to work in the sector. Shorter journeys and more regular hours will encourage skills into the sector.

Additional Information

Q6. Additional comments on what you think should be included in the ten-year strategy for the road haulage sector:

We believe that a key consideration for the department when drafting a ten-year strategy for the road haulage sector is to ensure that there is both public and political awareness of the critical role the transport industry provides to the nation, to businesses and consumers alike. Attaching value to the transportation of goods, as opposed to "racing to the bottom" pricing policies. A push towards a re-design of the supply chain with less reliance on speed of transit and more focus on the "greening" of the supply chain, which will involve greater utilisation of modes of transport such as ship/barge/rail with road transport being limited to shortest possible "last mile". The encouragement and incentivisation to switch to fewer polluting forms of engines such as electric and LNG (and CNG) for that part of the transport journey. Members mention that intensifying the direct engagement between the department and stakeholders is essential to achieving the goals and aims of any strategy for the sector.

We believe that Government needs to approach the issue of climate change in the same way it approached Brexit – calling out the challenges and opportunities coming down the line and heighten awareness among the business community on what actions need to be taken to ensure that operations are adapted in line with international and national policies that have deadlines that need to be met. In so doing there is an opportunity for competitive advantage.

On behalf of the IEA,

Simon McKeever
Chief Executive

DATE: 15.07.2021



Irish International
Freight Association

**Ten Year Strategy for the Haulage Sector
First Consultation Document**

**Irish International Freight Association
submission to
Department of Transport, Tourism & Sport**

Thursday 15th July 2021



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Irish International Freight Association

The Representative Body for Irish Freight Forwarders and Customs Brokers - www.iifa.ie

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About Irish International Freight Association

Established in 1962, Irish International Freight Association (IIFA) is Ireland's National Representative Body for the Irish Freight Forwarding and Customs Brokerage service provider industries.

The Association represents its Members interests at Government level and supports the business of its Member companies by hosting informative seminars on Industry relevant topics and through appropriate communication streams. With a view to maintaining a high standard of professionalism within the Industry, Education is key aspect of the Association's work, providing the internationally recognised IIFA FIATA Diploma in Freight Forwarding within Republic of Ireland (since 2008) and, as a response to the challenges of BREXIT, the IIFA Customs Awareness & Practical Customs Declaration Completion course (since 2018).

IIFA is Ireland's National Association Member of **FIATA**, the International Federation of Freight Forwarders' Associations, based in Geneva, Switzerland and **CLECAT**, the European Association for Forwarding, Transport, Logistics and Customs Services, based in Brussels, Belgium. IIFA invests significant time and resources into organising Delegates to attend CLECAT and FIATA events in order to represent the interests of the Irish Freight community and to obtain the latest industry relevant information for dissemination to its Members.

The Association is governed by a Council of Representatives from within its Membership body. These Owner Managers of indigenous Irish SMEs and High-Level Executives from within leading Multi-Nationals are well positioned to guide the Association. With respect to Education, Council set high standards for the Education outcomes of IIFA's training initiatives and play an active role in providing appropriate case study material. These aids form an integral part of any IIFA learning and supports practical understanding of academic training content.

IIFA is also a founding Member of the Logistics Associate Consortium, which brought the introduction of a Logistics Apprenticeship to the Irish Freight + Logistics industry in September 2018, and is an active Member of the Department of Transport, Tourism and Sport's Logistics & Supply-Chain Skills Group.



(Left) Tom Thornton of IIFA talking BREXIT at 2019 National Manufacturing & Supply Chain Exhibition Citywest

(Right) Seamus Kavanagh of IIFA speaking about IIFA Customs Training at the World Customs Organisation, Brussels, 15th November 2018



(Left) IIFA Standard Trading Conditions Seminar in the Offices of Kennedys Law, 30th November 2017





Introduction

While not as directly involved in managing Road Haulage Fleets as fellow Industry Associations IRHA and FTAI, IIFA members utilise the services of the Haulage industry. Described as 'Architects of Transport,' the role of the Freight Forwarder is to plan out the journey, arrange the appropriate international documentation and licenses and procure the appropriate transport for their client's safe and compliant cargo transport journey. The safe and efficient operation of the Irish Haulage industry is of concern for the continued operation of the Irish Freight industry, and it is in support of our Haulage Industry Colleagues that we submit the views of the Irish Freight Forwarding and Customs Brokerage industry with this First Consultation Document on the Ten-year Strategy for the Haulage Industry.

Within this document, the Association focuses its response on Driver welfare, perception of the industry and areas where the operation of the Customs Process can be improved. Such actions would lead to better working conditions and mental health of the Driver.

Infrastructure changes across the Country to facilitate, support and promote transition to decarbonisation is also examined. Given the fragmented and heavy SME organisation of the industry, Government grants are highlighted as one of the keys in progressing this area. Future planning and infrastructure to support the freight transport industry is also touched on as an area that would merit a separate and more focused study, perhaps when this strategy is further along and the attainable goals are identified.

Labour and Skills is the final piece addressed and this requires not only an educational and promotional approach, but also attempts to change the perception of the industry. Haulage is regarded as a low skill industry, yet such an attitude would not fully reflect an understanding of the modern work environment of the Sector, whose work is vital to not only the economy but to the daily lives of Irish People.

COVID 19 – Lessons learned and future policies

With respect to lessons learned from the pandemic and future policies, COVID19 did allow some small focus on the practical workings of the Haulage industry and in doing so, has highlighted the areas where more work is required. These would be a lack of policy and strategy for those in roles that could not be worked remotely and with Driver perception and facilities.

To begin with, the COVID19 landscape experienced from March 2020 is hoped to never be repeated yet still, now is the time to pen guidelines for operation of the Haulage sector and procedures for Drivers / for those engaging with Drivers to follow. The industry responded itself with its own process and procedures which did work and so perhaps the relevant Government Authority can seek out and investigate a number of relevant case studies in order to prepare future guidance should future pandemic or similar situations arise. With the Driver shortage situation, there will be new Players in the industry soon who will not have experienced working against COVID19 conditions and so such guidance would be an aid to such persons in the future.

Secondly, Driver perception and facilities was in fact a significant and disproportionately unfair situation for those frontline Workers in the Haulage industry. Those in the Medical Profession and those in staffing Supermarkets were respected for their frontline and essential roles in supporting the infected and sustaining the public respectively. Hauliers provided an equally necessary service in delivering the vital PPE materials and the foodstuffs for these Workers to carry out their roles.

However, we regret to report first-hand accounts from Hauliers that their experiences during this time were painfully negative. As their work saw them travel long distances (during a time of 5k restrictions for the greater population) and interact with people in different areas, there was a perception that Drivers could be contacts with a potentially high risk of infection. They were denied access to essential amenities and support facilities at destinations while their cargo was eagerly received. These Driver were individuals responsible for travelling long distances and maintaining the integrity and security of their cargo, yet the tole taken by their physical and mental health during their period was not fully appreciated.

Perception is of course a difficult piece to address, and we do acknowledge the Minister of Transport's Friday 3rd April 2020's press release on the importance of maintaining links within the Supply Chain, including his complimentary words of support for those working within Transport, Freight and Logistics. The Winter Snow situation of March 2018 and COVID19 have begun to bring awareness of the workings of the Supply-Chain that keeps the Economy and its people flowing and looked after. It is hoped that with this will later come with an understanding and then appreciation of the roles carried out by those working within the Supply-Chain so that they will receive the support they need in performing out their essential work.

BREXIT – Further action to manage BREXIT changes **and the evolving EU-UK Relationship under the TCA**

The primary formalities introduced by BREXIT are Customs procedures, the work of Freight Forwarders and Customs Brokers. It is generally only the larger Haulage firms which will have had the resources to adapt to incorporation of this additional workload yet still, when there is an issue with the procedures, it is ultimately the Haulier that is left sitting in the Port waiting for a load to clear, unsure of the issue, how long they must wait and how they can plan ahead.

6 months into BREXIT, there does remain issues with wait times for clearing cargoes. Shipments can be red, orange and yellow routed but there is no consistency with respect the length of time for any of these to be addressed. Where it is clear what is required (missing documentation, amendments etc) a prompt upload does not guarantee cargo being released within 24 hours.

The issue arising from this are all on the Driver's shoulders. They cannot tell how long they must remain in the Port for with their cargo; they cannot plan ahead to have a Colleague relieve the Driver, they cannot plan their resources against future work with their vehicles held and ultimately, they cannot advise their Clients of delivery. The uncertainty around delays generates only great difficulty throughout the Supply Chain with all parties on the chain feeling an impact.

This says nothing of the mental health and welfare of the Individual waiting in the Vehicle facing an uncertain wait time. To take just one case from a Member; a shipment arriving on a Thursday was routed orange, had its documentation uploaded on the same day yet was not cleared for release until the Monday, with no advance notice on the Thursday that this clearance would likely take up to 4 days.

Tied in with this is the issue of future recruitment into the Haulage industry. Stories such as this are commonplace in the industry and across vital sites such as LinkedIn. These are becoming a standard tale and unless a mechanism is put in place to standardise expectations of feedback for non-green routed cargo, this will only add to the difficulty of future recruitment into the industry.

To be fair and to balance this situation; Pre-Boarding Notification has been a beneficial initiative and has succeeded in its goal; that of keeping green-routed cargo flowing and preventing traffic jams at Ports. The rationale behind this was sound and we are confident that a similar and equally effective solution can be found to the above issues through cooperative collaboration between the relevant parties involved (those who complete Customs Declarations and the Customs Administration) which would relieve pressure and bring a beneficial workflow to the Haulier.

There is a separate question in this area regarding the EU-UK relationship in road haulage under the TCA evolving over time. The view of the Association is that there will be a natural divergence between regulations over time. It is not expected that there will be significant moves aside, rather several smaller changes that will lead to notable visual differences.

To take one recent example, the UK faces its own difficulties with Driver shortages and have already acted in an attempt to address same by temporarily increasing Driver hours. As the rules and regulations governing Haulage diverge between the EU and UK jurisdictions, the Irish Haulier will be impacted as they attempt to meet the standards of both.

Environmental/ Decarbonisation

On this topic, the reality for the Irish Haulage industry is that it is a fragmented industry. The DTTAS First Consultation Document highlights an average of 6 HGVs per Operator within the Industry. For such SME Operators, the scale of change required to move from traditional practices to modern decarbonisation is a formidable challenge.

Larger indigenous and Multinational Operators will have better access to the resources to handle this, yet the SME Operator will be in need of Grants to both incentivise and make their transition possible.

A further point on incentivisation must be made regarding infrastructure. Charging points and vehicle supports would need to be available on wider scale and be more visibly promoted to create an awareness and acceptance in the Haulage industry that transition to a decarbonised operating fleet can work.

A question in the First Consultation Document seeks to investigate eco training as part of Driver CPC training. We would see this as a priority action. Familiarisation with a concept later moves to acceptance and small steps in this area now can have a more practical impact in the future, given that this is a 10 year process. A reward scheme of sorts might be a useful mechanism to make this appealing to Individuals.

Road Safety

We do not feel that there is anything of significance to add on this item. The RSA have clear goals and mechanisms in proactively protecting the safety of all Road Users.

Safety Road Infrastructure + Intermodal Transport

This particular question regarding National Infrastructure and Planning aligning aside the needs of the Freight Transport industry should not be underestimated and does merit a more focused study. Today's planning attempts move from a reaction to present infrastructure and not against the desired goals of the future.

The goal here is to streamline the movement and flow of the Haulage industry and an efficient and environmental manner. Looking at Dublin Port, there are two Container Terminals with both separated by a Toll Bridge in-between. All Ro/Ro activity is based on the North side of the Terminal and while this does provide links to the Port Tunnel, Alexandra and East Wall Road can hit high traffic activity during peak hours. As BREXIT necessitated additional space for Vehicle and Cargo checks within the area of the Port, empty container terminals have been located outside of the Port in Finglas/ Coldwinters, adding additional journey time, Driver's hours and carbon output.

A further item against this on the Environmental Agenda is arrangements for Rail Freight. To access the available rail infrastructure, Lo/Lo Cargo must be transported across the Toll Bridge in order to be loaded on the North side of the Port. While having Lo/Lo activity passed to the North side of the Port, the Rail tracks do not line up alongside the Lo/Lo facility yet again, further issues exist when a Train is fully loaded with cargo in that the Rail Operator must hold up the busy junction at Alexandra Road when leaving the Port.

There are solutions to this, such as potentially focusing Rail at a single Irish Port such as Waterford where the rail infrastructure is set to meet Lo/Lo traffic. As highlighted the beginning of this section,

this would merit a more focused study, perhaps when the strategy is further along and infrastructure plans can then be made against the appropriate and forecast goals.

Labour Market/ Skills

As a Member of the DTTAS Logistics and Supply-Chain Skills Group, we are aware of work already underway in attempting to address this area. The reality of this situation is a lack of awareness of the roles available within the industry, its opportunities and its possible progression paths.

If asked, Members of the public would likely imagine the Transport industry as HGVs and Warehouses. They would not be aware of the organisational, analytical and rewarding roles of Freight Forwarding, Customs Brokerage, Transport Planning and more. There are knowledge heavy and creative opportunities for those eager for problem solving roles and an awareness campaign of what the sector can offer would be advantageous.

Routes into these industries have begun to become clearer with the introduction of the Logistics Associate Apprenticeship, aimed at Young Persons following their Secondary Education. Our own Association has facilitated the transition of persons from separate industries into Freight Forwarding through our Internationally recognised FIATA Diploma in Freight Forwarding. The different approach required to attract Young Persons and those existing Professionals seeking to find a new industry should also be given consideration given the separate needs of both categories.

A formal structure or matrix detailing the roles within the Industry and the possible career path across many years of service could be an appealing assets to be used by School Guidance Counsellors and even the Irish Freight, Transport, Logistics and Customs Brokerage industries themselves in promoting entry to new persons.

Summary

There are issues facing the Irish Road Haulage sector and this initiative to conduct wide-reaching research and the plan for a constructive Ten-year strategy are appreciated by Irish International Freight Association and the Member businesses it represents.

With a focus now on the industry, time should be invested in preparing guidelines for operation of the sector during a pandemic or other crisis scenario, drawing from the experiences of recent memory. Appreciation of the work undertaken by the Haulage Driver is beginning to emerge yet a campaign, both politically and to the public, highlighting this key work would certainly be a positive initiative.

Across the industry, other initiatives to streamline procedures adjacent to Haulage work would bring benefits to the operation flow, well being and mental health of the Driver. Such work could commence with standardised response times against non-green routed Customs Declarations, which do not guarantee cargo being released within 24 hours once the appropriate response is received from Trade. Ultimately, the Driver of HGV Vehicles is responsible for the integrity and safety of their cargo and must be supported with appropriate guidance with which to plan their operations.

The identity of the Haulage industry should also be recognised; that of SME Operators working on low margins. The business, procedural and investment changes ahead of them are colossal. They would best be supported with awareness of the forthcoming changes through training, information campaigns, incentives and grants.

Infrastructure to support the freight transport industry should be given separate and more focused study. When this report is further developed with strategies identified and goals set, infrastructure should be reviewed against the support the goals set.

Initiatives already in place will aid attraction of talent into the industry yet focus on educational initiatives must come from the Industry, given their knowledge and experience of the skills necessary to produce the appropriately skilled Individuals to carry out the work needed.

Irish International Freight Association is supportive of this good initiative and remains willing and open to work with Government and fellow industry Associations and Stakeholders in a collaborative effort to support the Haulage Industry and the persons who carry out that work.

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IIFA is Ireland's National Member of FIATA, the International Federation of Freight Forwarders Associations, and CLECAT, the European Organisation for Forwarding, Logistics, Transport and Customs Services



Irish International Freight Association

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IRHA submission to the Department of Transport consultation on a ten-year strategy for Ireland’s road haulage sector

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EXECUTIVE SUMMARY

As can be seen in the 10-year Transport strategy document and is referenced below, Ireland is in a unique position in Europe, in having most of its Road Transport requirements met by its indigenous national fleet. Compared to other EU Member states, Ireland depends more than most on national registered vehicles, to enable its economy and society to function. Our geography obviously contributes considerably to this scenario, but as a consequence allows the State to derive a greater return from the sector than many other EU States, while allowing the sector to operate to its optimum efficiency.

This therefore allows the State to have the greatest influence on emissions from our commercial fleet by influencing the makeup and utilisation of this indigenous fleet. However, the statistics around our fleet demonstrate a persistent exclusive reliance on diesel, and thus a poor delivery by the State so far in creating any incentives to influence any reduction in the greenhouse gas emission of said fleet.

For the past 20 years the truck suppliers have achieved a 1% CO2 reduction on average per year. This has to increase to 2.5% reduction in CO2 per year up to 2025 and 3% reduction thereafter up to 2030. Ireland has largely failed in the pursuit of any of the vehicle improvements so far achieved, through State inaction and industry access to second hand UK vehicles. This is reflected in the age profile and emissions class of our existing fleet.

Ironically, BREXIT by impacting on the importation process of older HGV's from the UK, will inadvertently do more to improve transport emissions than any State action to date. This will be reflected in an increase in new vehicle sales, thereby achieving the lowest emissions possible today, for said vehicles.

We, in the IRHA, and our Members have been actively engaged in the processes put before us to date, contributing significantly to this research, analysis and debate. This has been with ZERO outcome, from our perspective, that has or will lead to any reduction in emissions within a short time frame. These projects/workshops are all listed below.

While the IRHA welcomes this opportunity to contribute to another consultative document, we very much hope the strategy outcome will have a positive outcome in not only achieving results but doing it so in a manner that is cognisant of the transport industry and its current circumstances post-Covid and post-Brexit. Please also note that the work of our members is secured primarily on price, with quality of service being another consideration. The Transport emissions for any product movement is well down the list of any Consignor/Consignee despite what the 10-year transport might suggest.

*We invite you therefore, to give due attention to our input below and in doing so, **please remember that the timeline for Government targets do not align with the purchasing decisions for ANY transport operator. New technologies and fuel types are indeed coming but they will not be on the radar of most operators for many years. Our input is cognisant of that and is focused primarily on what the transport sector and the State can do NOW and not in 10 years time.** State policy has always opted for the latter, which explains our frustration at the level of inaction. Most of our proposals are ready to be implemented TODAY and have been so for the last six years.*

In this submission, the IRHA will also give an input under the Headings COVID, BREXIT, MAKING ROAD FREIGHT SAFER (including National/Non-National Roads) and LABOUR SKILLS AND MARKET, where similar observations on deliverables and timelines also apply. Our observations, work to date and suggestions are all outlined below.

Thank you for your time in these important matters.

FOREWORD

The IRHA, as the representative body for the licensed road haulage sector in Ireland and member of the International Road Transport Union (IRU), welcomes the opportunity to make a submission to the consultation process for the Government’s 10-year Strategy for the road haulage sector. This will be the first time a specific policy context for the road haulage sector will have been set since the establishment of the State and comes at a time of unprecedented challenge and change.

The IRHA believes that a properly informed strategy for the licensed road haulage sector has the potential to transform policy and regulation impacting on the sector. If properly constructed a new strategy for the sector could replace ad hoc and disjointed interventions by the State, which have produced ineffective, contradictory, and suboptimal outcomes for the sector, business and consumers and ultimately the wider economy and society.

In order to be effective, the Government’s 10-year Strategy for the sector needs to take due account of views from a range of stakeholders and in particular be open and receptive to views expressed by licensed hauliers.

The IRHA submission seeks to outline the perspective of the sector, based on first knowledge and experience of delivering licensed haulage services in an international and national context. The sector’s perspectives on the current and future challenges facing licensed haulage is based on first hand practical experience and managing real life obstacles and challenges.

The first consultation document published by the Department of Transport sets out some important contextual material relating to the sector, which the IRHA believes should be front and centre of any review of policy impacting on the sector. The key figures are set out below and are taken from the description of Ireland’s haulage fleet on pages 4 & 5 of the Consultation Document.

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.

3,791 Licensed Operators operating 20,219 HGV’s. The sector is therefore a key employer.

International operators average 6 HGVs per License, with National Operators averaging 4 HGV’s per license.

53% of Ireland’s national operators have only 1 HGV.

The Licenced operator account for 72% of freight transport activity compared with 28% for own account operators¹.

91% of the road freight activity originating in Ireland is destined for another location in Ireland.

94% of road freight activity destined for Ireland originates from another location in Ireland.

The sector is competitive and operates to tight margins.

45% of Ireland’s national HGV fleet is over 10 years old.

There are three **key observations** from the table above that the IRHA will give some additional attention to. We ask that you read below to understand 3 important realities:

1

Ireland is dependent on its indigenous transport industry

The industry as described above, is one that the commercial life of Ireland's economy in its totality is dependent upon for its function. As an island nation, we do not have the luxury of getting another EU transport operator from next door to travel over the border to deliver an urgent consignment, such as is the case on the mainland of Europe. **Ireland's dependence on its indigenous transport industry is** at a level that does not exist in any other EU jurisdiction, save for Malta or Cyprus. Any measure or imposition on the transport industry as a burden or extra cost in its operation, will and does impact on the **consignor/consignee** i.e. Irish business. 95% of goods transported under a transport license in Ireland are carried by an Irish licensed operator, which is one of the highest as a proportion within the EU. Ireland's experience in dealing with both Brexit and Covid not only highlighted this reality but also demonstrated the industry's commitment, through its owners and staff, to deliver a service under exceptionally challenging circumstances.

Ireland's transport operators are small to very small and operating under tight margins

The bulk of Ireland's transport operators are small to very small, with the whole industry "**operating to tight margins**". It is encouraging that the Department's consultation paper recognises the financial challenges faced by the sector with high levels of competition, low levels of profitability and limited financial resources to endure additional costs – in particular, while the sector deals with the turmoil of Brexit and Covid 19. This recognition needs to be reflected in the policy recommendations flowing from the new Government strategy, both in terms of keeping cost impositions low and introducing targeted incentives to support the sector transition, including to a low carbon model.

Ireland has an aging HGV fleet

The age profile of our nation's fleet not only impacts negatively on emissions but denies all road users the benefits of the intrinsic safety features that are available on modern vehicles. These features by themselves can reduce the numbers and consequences of incidents on our roads. Practical measures are required to facilitate an upgrade in the national fleet and making the pursuit of the modern vehicle of paramount importance.

Taking these three factors together, it is imperative that one tangible outcome of the Government's 10-year Strategy for the road haulage sector is a properly focused and targeted strategy, with support and incentive schemes to upgrade the national fleet to modern standards.

It is also important that Government Policy for the sector is evidence based and not constructed on anecdotal or misplaced perceptions. For instance in the consultation document for the Strategy it is stated:

*"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 vehicles."*²

The basis for this statement is not sourced in the document and it does not reflect the practical experience of IRHA members. It also runs counter to some of the observations made by the Department when describing the sector, specifically the fact that over 45% of the national fleet is still over 10 years old and is almost all diesel-fuelled.

For the outcome of this process to have any value, its findings must be based on facts. In addition to the above incorrect statement, the IRHA can cite many cases of tokenism to accommodate a lower emission vehicle for marketing reasons, whilst members' universal experience is that work is awarded on one primary parameter and that is **PRICE**. The notion of a company voluntarily paying higher transport costs for reduced emissions on the road is a misplaced and dangerous fallacy. The vehicle used to do the

² Page 9, Consultation Document, Making Road Freight Transport Cleaner.

collections/deliveries for any consignor or consignee has NO bearing on that company's energy statement, such is the current measuring structure, and the Real World operates accordingly.

The IRHA is therefore respectfully requesting that the formulation of policy for our sector should be based on the realities impacting on the sector, supported by evidence and avoid generalisations or anecdotal and unsubstantiated claims. Policymakers must keep these points very much to the fore, as no pursued change to a low carbon future can be achieved, unless it is cognisant of the nature of the industry, the operating environment and its circumstances.

*

MAKING ROAD FREIGHT TRANSPORT CLEANER: ENVIRONMENTAL REGULATION, SUSTAINABILITY AND DECARBONISATION

1. IRHA APPROACH AND COMMITMENT

The IRHA recognises that under the Programme for Government a core element to the new Strategy for the sector is to help move to a low carbon further by improving efficiencies and standards. This is an area where the IRHA has significant credentials and experience.

The IRHA is embracing the "Greening" of transport and has had considerable input to many projects, both in Ireland and at EU level including as listed below:

<p>1. Developed the ECO/SMART Driving upskilling course for existing Drivers in collaboration with WWETB and LSM ETB. This is an accredited 3-day course titled, <i>Certificate in Digital Assisted Eco-Driving (HGV) Level 5, Special Purpose Award</i>. Please see this link for further information https://smartdriving.ie/home/.</p>
<p>2. Engaged as a partner in the ECO/HDV DRIVE Research report with TCD, funded by EPA. One of the conclusions is how the EURO VI HGV supports this approach with its vehicle telematics. Please see ECOHDV for further information http://ecohdv.ie/.</p>
<p>3. Engaged as a partner in the MAP/HDV Research project report with TCD funded by SEAI. One of the conclusions is how the EURO VI HGV supports this approach with its vehicle telematics and improved emissions. Please see MAP/HDV for further information http://maphdv.ie/.</p>
<p>4. Participated as a stakeholder in the Freight Decarbonisation Working Group overseen by Consultants ARUP on behalf of DTTAS. One of the conclusions is how the EURO VI HGV is the only immediately available technology of commercial scale and value to achieve an emissions reduction. Please see this link for further information.</p>
<p>5. Participated in the LEV Workshops organised by the Climate division of DTTAS.</p>
<p>6. Is a contributory member of HMI (Hydrogen Mobility Ireland). Please see this link for further information. See more at :</p>
<p>http://hydrogenireland.org/wp-content/uploads/2019/10/HMI_report_final_Oct3rd2019-2.pdf</p>
<p>7. Is a member of H2 Haul, an EU Hydrogen Mobility Group. Please see this link for further information.</p>
<p>See more at https://www.h2haul.eu/.</p>
<p>8. Is a member of the Geneva based IRU, which has developed its own Freight decarbonisation document ready for submission to the EU Commission. Euro VI and upcoming EURO VII are referenced as the only available technology of scale to have an impact today. See more at https://www.iru.org/system/files/IRU%20-%20Decarbonising%20road%20transport.pdf.</p>
<p>9. The IRHA had its submission for EU Licence Category change recently ratified by the IRU, which promotes/accommodates electric vehicle driving by our youth from 16 years old while also allowing them to train for commercial vehicle driving at 17. While accommodating more people to enter the profession, it will also help tackle the youth unemployment rates EU wide³. It is to be hoped that the Irish Government will recognise the social benefits of this proposal and will join IRHA and IRU in their endeavours in Europe to promote it.</p>

3

2. The 10-year Transport strategy document on environment and decarbonisation

The IRHA is concerned that the existing support and incentive mechanisms to secure a transition to a low carbon future for the sector are misdirected and do not start out with a recognition that nearly half of the national fleet is 10 years or older and is almost entirely dependent on diesel.

In the 10-Year Transport strategy document, the current support mechanisms to date are listed⁴. These include:

- *A commitment to maintain a reduced excise on gas as a fuel for another 8 years,*
- *An accelerated capital write down of an alternative fuelled vehicle,*
- *Toll free for alternative fuelled vehicles,*
- *Purchase support for an alternative fuelled vehicle.*

The AFDHV Grant support, just announced, is specifically for CNG, LNG, FCEV, Plug in Hybrid and EV.

So with 45% of our national fleet 10 years or older, one would expect queues at the suppliers of these vehicles to avail of these mechanisms and schemes. This is not the case for the reasons set out below.

3. The IRHA evidence based analysis on potential technologies

3.1. CNG: Through Project Causeway, the State has supported the uptake of CNG trucks by transport operators, through purchase grants and reduced excise. These incentives have been available for nearly 5 years but with very little positive impact: there are currently only 3 fuelling outlets and only less than 100 CNG trucks operating in Ireland. Within that time frame, Mercedes, MAN and Renault have dropped their gas engine option with now only SCANIA and IVECO offering a CNG fuelled vehicle. For CNG to achieve any significant emissions reductions requires a Bio Methane input. Its all-in train but at an excruciatingly slow pace and consequently few hauliers regard CNG HGV's as offering a realistic transport solution.

The timeline thus far suggests many more years before a national CNG fuelling infrastructure will be in place, by which time one can but presume, the new fuelling technologies of hydrogen and fuel cell batteries to be well advanced and available. **Consequently, it is currently a limited and restricted option.**

3.2. LNG: While LNG is CNG at minus 160 degrees i.e. liquefied, it requires different tanks and fuel metering systems so the LNG truck is a different prospect. We know of no fuelling outlet in Ireland and in talks with Volvo who have this truck option, it was stated that as none are yet operational in Ireland, they have no backup or service regime in place, plus the vehicle is €45,000 more expensive than its diesel equivalent. This vehicle also cannot travel on the Eurotunnel and certain ferries. **This is therefore not a viable option.**

3.3. HYDROGEN FUEL CELL: Presently Toyota has HGVs on trial on San Francisco Docks and Hyundai has 12 in Switzerland with another 88 to arrive before the end of this year. Through the IRHA involvement in Hydrogen Mobility Ireland (HMI), 3 sites in Ireland are being considered as potential hydrogen production and storage facilities, with a fourth for production to fill gas bottles. The concept of picking and dropping hydrogen tankers at haulier depots is also being investigated from a planning and insurance perspective, while in Brussels, the IRU are seeking an EU wide policy on tunnels, cities and ferries for hydrogen fuel cell vehicles. These vehicles will, in the short term be 4 to 5 times the price of their diesel equivalent, have a considerable weight disadvantage and

⁴.

without using Liquid Hydrogen (minus 235 Degrees) to increase energy stored, HGVs with their shorter wheelbase will not be able to carry sufficient fuel for any great distance. Such an approach increases the energy required and the cost of the Hydrogen making it unviable compared to diesel for the foreseeable future.

Suffice to say, **it is a work in progress with a 5 to 10-year timeline before these vehicles are both commercially available and commercially viable.**

A joint venture by VOLVO and Mercedes Benz is targeting 2025 to begin production of a hydrogen fuel cell HGV where at least a 1,000 fuel depots will be needed across Europe to make such a vehicle practicable. HYZON and Hyundai have vehicles available in small numbers with many trials happening globally. The infrastructure and its issues are also a work in hand.

Not an option yet.

3.4. PLUG IN HYBRID ELECTRIC: Two manufacturers, SCANIA and DAF, are currently trialling diesel electric hybrids, with no firm date on availability or price, especially with our left hand drive road network being another barrier to vehicle supply in Ireland, for any new models in this frontier of HGV evolution. One aspect we do know is there is a considerable weight penalty with these vehicles as well as an anticipated price penalty, as with any electric option being trialled currently.

Not an option yet.

3.5. ELECTRIC VEHICLE: While this concept is growing apace in the world of cars, its suitability for long-range trucking is currently in doubt. Today in Europe, there are several bespoke companies who can convert a second hand or a new truck to battery power. They collectively can do over a 100 vehicles a year at a cost of 4 to 5 times that of the diesel equivalent. Plus with 300,000 to 350,000 HGV's per year purchased new EU wide per annum, there is little here yet to replace diesel. None of the mainstream manufacturers have an electric HGV artic yet to market, albeit many have versions on trial. RENAULT is the first with a 26 tonne rigid available in limited numbers, with a price tag of EUR 450,000 and an additional weight penalty of 2 tonnes.

Not an option yet.

The remaining challenges with EV are the lack of development of high speed charging infrastructure. In March 2021, the European Commission [report](#) on the implementation of the Alternative Fuel Infrastructure Directive (AFID) stated that the growth of alternative fuel vehicles is not matching infrastructure deployment in Ireland.

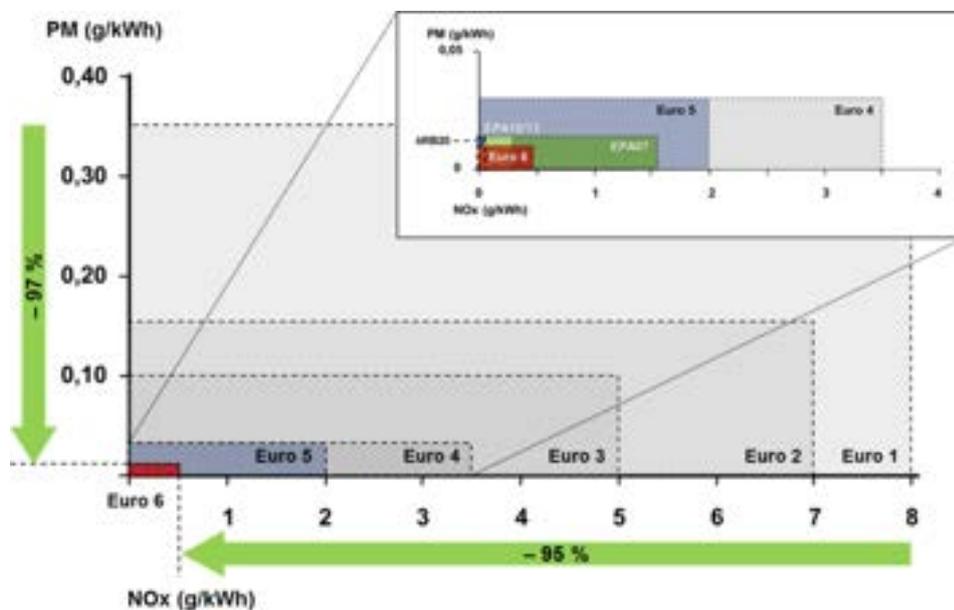
Currently, any Irish transport operator operating nationally or internationally, in truth, only has ONE option to upgrade their fleet of scale and that is DIESEL. If the aim of the government is to remove as much carbon as possible from emissions as quickly as possible, incentives to remove a highly polluting older fleet and replace them with newer diesel technologies would have more immediate and measurable effects for the next ten years, while alternative technologies and their infrastructure become available and affordable.

4. The “Low Hanging Fruit” approach and options proposed by the IRHA

As part of the IRHA contribution to the many projects listed above, the “*Low Hanging Fruit*” options are presented below. These initiatives can produce immediate results in moving to greater efficiencies, improved standards and achieving a low carbon future.

4.1. Incentives to the purchase and running of a Euro VI HGV. With these vehicles available across all manufacturers including back up, using familiar technology and an existing fuel infrastructure, replacing the 45% of the national fleet over 10 years old with Euro VI models would result in a considerable emissions improvement over the current situation and should be pursued.

This can be achieved through a financial support package (grants and tax allowances) for the purchase of these vehicles and giving an operational incentive, through road tax rebates, tolls rebates, permits accommodations and increased permissible weights. The graph below shows the scale of emissions improvements available today. Such an approach would now also bring significant safety aids into our national fleet due to the standard safety features now intrinsic in the modern vehicles.



4.2. Improving CVRT Test on Adblue Systems and incentivising the use of cleaner vehicles: The Emissions testing of HGV's as currently applied is so basic that a vehicle passes even if its Adblue after treatment system has been turned off. There is no check on any aspect of the after treatment system or to see if the emissions concur with the type approval parameters of the vehicle. It is possible in Ireland to remove totally the after treatment from a Euro VI HGV and still pass its CVRT test with no sanction from the RSA or on the road, as our State costs make no reference to any emissions class i.e. road tax, tolls, fuel rebate or the Dublin City Permit (which could be used to incentives the use of cleaner vehicles).

4.3. Support for the use of HVO (Hydrotreated vegetable Oil) to reduce fossil fuel use in existing rolling stock. ALL modern Euro VI HGV's can be configured to run on up to 100% HVO. INVER Oil has a B20 fuel available in Ireland, which is 20% HVO. As no State support is available, this fuel is dearer than ordinary diesel so there is little uptake. Finland is now consuming 24% HVO of its total needs, replacing diesel in its national fleet. With such an option immediately available, but without any State support in its supply

and tax treatment, it can only be considered one of the many "missed opportunities" to achieve decarbonisation.

4.4. Support for night-time deliveries with Dublin container terminal to operate for longer hours. This would reduce daytime congestion in the greater Dublin area as reduced numbers of HGV's moving during the day, whilst having their work done at night and achieving a potential 20% fuel saving and up to 30% time saving due to a reduction in starting/stopping and fuel costs. Everyone wins, including the environment.

4.5. Express HGV lanes at tolls. 10 of the 11 Road toll stations in Ireland have no HGV Express Lanes wasting up to 6 million litres of fuel per annum and producing unnecessary emissions. As an example, in Dublin Port Tunnel, which accommodates 7,000 to 9,000 HGV's per day, ALL must stop at the toll booth, in spite of it being free to HGVs. Our figures suggest over 3 million litres of fuel is wasted here alone as a laden HGV can consume up to 2 litres of fuel to get back up to speed again after being forced to stop. These additional emissions are very relevant in the light of the southern point of the Port tunnel, being highlighted as an emissions black spot by the EPA.

[:https://www.rte.ie/news/ireland/2019/0708/1060952-nitrogen-oxide](https://www.rte.ie/news/ireland/2019/0708/1060952-nitrogen-oxide)

4.6. 40 to 42 tonnes on 5 axles reinstated: 6 million additional kms alone is now required to collect the farm milk being produced throughout Ireland as a consequence of this weight reduction. This could be reinstated for low emission vehicles only, including Euro VI diesel, giving an operational advantage to the modern vehicle, whilst accelerating the transition to lower emissions vehicles. With 42 tonnes on 5 axles removed most operators moved to 46 tonnes on 6 axles increasing their horsepower and weight of the primary mover. This has forced one Co-op to cap the horsepower of these primary movers, such is the damage they were doing at farm entrances and in farmyards. An environmental own goal has been scored here with trucks up to 650 HP now collecting the nation's milk with an empty weight of up to 19 tonnes before they arrive at their first collection. This contrasts with the previous position where typically trucks averaged 380 hp and an empty weight as low as 14 tonnes before they arrived at their first collection. The Irish Government has the legislative competence to adjust these weight limits.

4.7. Traffic light sequencing in our towns/cities to expedite traffic flow and reduce stops. This is the norm in most EU towns and cities but, from reports, is not pursued in Ireland. The forced stop/start nature of driving without this sequencing has a considerable impact on fuel usage and consequently emissions, all within the built up areas. One HGV trial at 45 tonnes showed a 60% increase in fuel used with traffic light induced multiple stop/start movement over a constant motion scenario.

4.8. Fuel Rebate: The mechanism where a tax compliant Licensed Haulier can reclaim a small percentage of the excise on the diesel fuel consumed is an opportunity to support the funding of those operating more environmentally friendly vehicles. This can be done by introducing a staggered percentage to be paid back. The higher the vehicle's Emissions standards, the greater the rebate.

4.9. Mandatory emission class certifications for new vehicle purchases: Currently on purchasing ANY vehicle in Ireland, no reference is made to the emission class of the vehicle. This applies to all vehicle types including HGV's and thus, makes Ireland the only jurisdiction in the EU with such an omission. This contributes to a gap in awareness among the public and the transport industry, which is exacerbated by the lack of incentives or advantages in driving any emission class over another. With such an omission, the State not only lacks any real data on the nation's fleet make up, but as a consequence makes it impossible to create any Low Emission Zones (LEZs) as no registration number can be linked to an electronic database of emissions. All State charges, including the Dublin City Permit, are identical on a

1992 Euro I HGV as a 2021 Euro VI version. Indeed, for the IRHA, any potential restrictions or impositions linked to emissions levels can only come in once the appropriate incentives are applied too.

4.11. Increase in vehicle dimensions and weights: Many examples can be given of other EU Member States that operate HGV's of increased length and/or increased weight, primarily on specific routes. Such allowances can reduce the vehicular movements required by up to 33% giving an obvious benefit in emissions and road congestion. Two Eco-trucks carry the cargo of three standard trucks, which will also help to offset the projected increase in market demand by 2050, thereby maintaining the total number of trucks on the road today.

Table 1: Advantages of increasing the load capacity compared to the standard vehicle combination (40 tonnes GVW) in the EU, based on weight (in %)

Indicator	Standard articulated vehicle 44 tonnes GVW	Eco-Truck 25.25m 60 tonnes GVW
Load capacity advantage (weight)	11.5	54
Vehicle-km reduction advantage	10	35
CO ₂ emissions reduction advantage	10	25

Source: TLN and VIL, 2007; ITF, 2019; Eiffein, 2020; and IRU calculations.

Table 2: Advantages of increasing the load capacity compared to the standard vehicle combination (40 tonnes GVW) in the EU, based on volume (in %)

Indicator	Eco-Truck 25.25m 40-60 tonnes GVW
Load capacity advantage (volume)	54
Vehicle-km reduction advantage	35
CO ₂ emissions reduction advantage	30

Source: TLN and VIL, 2007; ITF, 2019; Eiffein, 2020; and IRU calculations.

The actions to achieve the role out of Eco-trucks in Ireland include :

- Permitting and harmonising the use of Eco-trucks for national and international operations.
- Lowering road user charges for Eco-trucks.
- Accelerating market uptake on priority corridors.

More information can be provided to the Dept of Transport if required.

4.12. ECO Driving: (See also item 4.1 above and the Road Safety section below) The easiest and cheapest means to reduce fuel consumption is through driving style, and to this end the IRHA, in conjunction with WWETB and MSL ETB, have developed the "Digitally Assisted ECO Driving Course" which is now fully accredited and has started its pilot phase. This is part of the CPC Course Module 1, which drivers are legally obliged to do. The IRHA believes that the CPC modules offered by the RSA are so poor and without value , that they fail to comply with EU Directive 645/2018. The IRHA has effectively addressed the deficiencies in the RSA offered modules by aligning itself with EU and national policy, delivering its own Eco-driving program to benefit the Irish transport industry and the State.

See below, Prof. Alan Mc Kinnon’s conclusions on the energy efficiency of the Road freight sector. Eco-driving is clearly impactful and comes with the lowest possible price-tag (slide extracted from the hearing held on 16th June 2021 by DOT).

Improving Energy Efficiency in the Road Freight Transport Sector

vehicle technology: new build + retrofits



Improve vehicle maintenance



driver training and monitoring



eco-driver training



telematic monitoring

upgrade fuel efficiency of ancillary equipment

e.g. more efficient transport refrigeration units, better insulation, improved operational procedures, alternative refrigerants

Truck platooning



Truck automation




5. Industry commentary on Irish policy initiatives on decarbonisation

The IRHA fully understands the pending national targets on reducing greenhouse gas emissions and the broader EU context for Ireland to meet the limits set for 2030, 2035, 2040 and 2050. However the impact of any transition for the licensed road haulage sector must have some bearing in reality and not be based on pie in the sky aspirations that cannot be met. They must be based on the sustainable transport options available NOW to the State and our members, so they can contribute to these long term goals. There is no point in formulating a policy or limits based on achieving targets that are dependent on a rapid roll out of nascent technologies, which have yet to achieve scale or have the required infrastructure.

There are two immediate measures that can be achieved.

First, the pursuit of the "Low Hanging Fruits" listed above, and second, the accelerated upgrading of the national fleet to Euro VI, recognising that diesel will remain the dominant fuel transmission source until a viable alternative is developed.

No amount of wishful thinking will change this core conclusion which needs to be at the heart of the Government's policy towards the sector.

The IRHA views on this issue are supported by a range of independent industry bodies as evidenced below.

5.1. Chartered Institute of Logistics and Transport (CILT) Policy Document on Freight Decarbonisation

"Presently there is no commercially viable alternative to diesel, the taxation on fossil fuel with no alternative will only put Ireland at a cost disadvantage commercially. Alternatively, measures to support the uptake of EURO VI/6 are needed".

"The freight transport industry requires more supportive policies and initiatives to increase the industry awareness and readiness for low-carbon transition, especially in light of Brexit's potential impact on trade-patterns and supply chains."

5.2. International Road Transport Union (IRU) 2021 Policy Document on Freight Decarbonisation

"No consideration for transitory measures towards the final decarbonisation and greening objective: The Strategy does not foresee a transition for commercial road transport, especially, its heavy duty segment, and disincentives the option for low carbon fuels. This approach taken in the Strategy ignores the reality that alternative solutions to combustion engines for heavy duty vehicles are only in the infancy of their development. A wide range of options will have to remain available, such as bio methane, hydrogen or synthetic fuels. The uptake of vehicles based on low carbon fuels should be bio methane, hydrogen or synthetic fuels. The uptake of vehicles based on low carbon fuels should be supported and incentivised and this should happen in a fiscally neutral way which does not increase the tax burden on transport operators."

5.3. European Automobile Manufacturers Association(ACEA) and Transport for London(TfL)

According to [ACEA](#), the European automotive association, modern diesel truck engines use highly efficient particle filters that remove well over 99% of all particles resulting in an exhaust particle content that is comparable, sometimes even cleaner, than the ambient air. Euro VI engines have slashed air quality pollutant levels "to near zero".

Transport for London also described Euro VI diesel as "ultra-low emission" vehicles, a conclusion reached only after extensive "real world" testing.

5.4. RENAULT: Quote from Jean-Claude Bailly, President of Renault Trucks Europe

"When it comes to regional and international haulage, diesel is and will remain for the next decades the dominant answer to transport industry needs, not for dogmatic, but for pragmatic reasons.... where the priority is the combination of low impact on environment and energy efficiency...."

5.5. DAF: Quote from Executive Director of DAF Trucks HOLLAND:

"The Diesel engine was a fantastic invention and still is a great engine today. It offers unmatched efficiency, reliability and durability. It hurts me that the public see it so negatively, ignoring the immense efforts to make it cleaner and cleaner and cleaner. Its image is unfortunately not in line with the facts" ... "We should never throw out the concept of the combustion engine, that would be a mistake".

6. IRHA conclusion on Decarbonisation

As stated in the 10-year Transport strategy document and is worth repeating, Ireland is in a unique position in Europe in having most all its road transport requirements met by its indigenous national fleet. As an EU Member, Ireland depends more than most on Irish registered vehicles to enable its economy and society to function. Our geography obviously contributes a lot to this.

The State therefore is well placed to have the greatest influence on emissions and safety around our national fleet, by influencing the make up and utilisation of this indigenous commercial fleet. In this regard, the statistics around our fleet profile and the near total reliance on diesel, demonstrate the poor delivery by the State to date, to incentivise or influence the renewal of the national fleet with a view to reduced emissions and improved safety to date.

The industry is a low margin business with little room for speculative purchases, especially when these purchases will have to be effectively funded by the operation of other vehicles in the fleet. An increase in consignment rates for lower emission vehicles is without any commercial basis and is unlikely to happen for our members. By coupling these facts to a very fragile industry, post-Covid and post-Brexit, along with the scale of the majority of licensed transport operations, it is obvious the uptake of alternatively fuelled vehicles will continue to be a slow process, with Project Causeway being a live example of this. Any substantial change will require considerable support from the State, alongside certainty of supply of all required components to make such a transition viable and without risk.

To expedite any uptake will require, an operational advantage or incentive, as well as:

- Greater awareness among transport companies of vehicles' environmental credentials.
- Any alternative fuelled vehicle to have been trialled in Irish conditions to prove its capability.
- These vehicles are available in axle configurations to match Ireland's regulatory and physical requirements.
- Implications for the Consignor/Consignee for the environmental implications of the transport aspect of its operation.
- State support for any purchases and fuelling investments to include technical back up and training.
- Fuelling infrastructure nationally established, linked into an EU wide infrastructure to accommodate both the National and International haulier.
- Manufacturers and retailers to demonstrate full knowledge and back up of the technology in components and expertise.
- All planning and insurance issues for the storage, distribution and consumption of these alternative fuels to be resolved before any rollout.

Until ALL of the above are in place, the Irish road transport industry has no option other than to continue to rely on a primarily diesel fuelled fleet. In the meantime, the State needs to support the upgrading of the existing fleet to the most modern diesel engines available, while the State and the manufacturers and their retailers, State agencies, Planning authorities, Insurance bodies and Fuel suppliers need to work to accommodate the transition to alternatively fuelled vehicles.

The IRHA, in line with the industry experts identified above, anticipate this will take at least 10 years for all that is required to be in place. Irish Government policy needs to recognise that a move to decarbonisation of the national HGV fleet over the next 10 years will have to accept that diesel will remain the main transmission source for the national fleet. Ensuring that diesel powers HGVs with the minimal possible level of emissions needs to be a key priority, rather than the current approach of penalising diesel fuel, regardless of the efficiency of the engines involved, and instead relying on technologies which are only still in pilot stage. To not acknowledge this and fail to support a fleet upgrade NOW would be another "missed opportunity" to join the many gone before.

BREXIT AND COVID-19

In the 10-year Transport strategy consultation document, it is stated that "*both COVID-19 and the UK's departure from the EU have presented significant challenges to the road haulage industry.*"⁵

1. BREXIT

The scale of the challenges brought about by Brexit has been unprecedented for the sector. To put this into perspective please consider that delays of up to 4 days have been experienced by hauliers and drivers as a consequence of Brexit.

There is no doubt that the State and State agencies were unprepared for Brexit and introduced a range of checks and controls which were reactive rather than risk based. Additionally, the technology platform on which they were based was not robust or sufficient and added considerably to cost, delay and red tape.

Also, the 6 pre-Brexit direct sailings to the continent per week which the State deemed sufficient for post-Brexit trade was based on a flawed IMDO report, and had to be increased to 26 sailings a week. These two consequences alone, as well as the Brexit statistics on the impact of trade flows demonstrate very well the dynamic impact Brexit has had on the transport industry.

To address the ongoing challenges posed by Brexit, the Government needs to:

- Review the existing checks imposed by the relevant authorities at Irish Ports to determine if a different approach can be implemented, which reduces delay, red tape and cost.
- Look at measures to re-establish the level and extent of connectivity between Ireland and Great Britain. A new seamless approach to transiting through Britain needs to be implemented instead of the existing reduced service and increased delay.
- Review the IT platforms being used by the Irish statutory authorities to increase dependability, reduce delay and ensure reliability.
- Adopt a consistent approach to addressing the challenges posed by the border with Northern Ireland. The Minister for Foreign Affairs was recently quoted as saying that the Northern Ireland protocol could be amended with the removal of 80% of the current checks. Similar reductions in checks at Ports in the Republic of Ireland needs to be assured to ensure that new market distortions are not created arising from any changes to the NI Protocol.

2. COVID-19

Meanwhile, the Covid-19 pandemic has had a devastating effect on our society and brought about logistical hurdles which the industry has never seen before, driven by border closures and checks, coupled with an imposed testing regime that varied depending on the nationality of the driver. Overall transport has been one of the sectors hit hardest by the COVID-19 pandemic, and many businesses in the sector are facing immense operational and financial difficulties: the IRU's [recovery report from June 2020](#) shows a 18% decline in turnover across Europe. Moreover, drivers were being denied access to basic facilities while on the road, making their job even more challenging and onerous, despite the valuable and necessary service they and their employers were providing. As well as the commercial losses such a scenario imposes, many staff were also lost to the industry and their return is unlikely.

⁵ See the First Consultation Document on the ten-year Strategy for the Haulage Sector (2021), p.5-6.

3. IRHA proposals

On the back of what the industry has experienced and suffered, the IRHA have some suggestions to be considered.

3.1. Make Drivers "Essential workers" which has been called for by the World Health Organisation and has, at the time of writing, been granted in Romania and Argentina. This will ensure our drivers get priority vaccinations, thereby protecting them as they execute such a vital service. It is also necessary to recognise and accept driver's vaccination certificates. Drivers with proof of vaccination must be exempted from COVID-19 testing at borders if certified tests have been carried out prior to arrival at the border, for example at company premises. The State has to advocate for the same approach at EU level and with UK authorities.

3.2. Instead of the Road Blocks used by the Gardai to check the public's movements, which had an unintended consequence of creating considerable delays for commercial traffic, the focus could be on Out Of County passenger vehicles getting the attention of the Gardai, while on patrol.

3.3. Create a small working group to deal only with the issue of COVID or BREXIT (or such situations of national concern) to combine the efforts of industry representatives and relevant state agencies. This would make the process far more connected, easier, less cumbersome, and targeted. A precedent exists in the Government Task Force on Emergency Planning, whose role could be widened to include industry input. The results can only be an improvement on what has gone before. **Such a body could be now also dealing with this 10-year transport strategy** linking up the different elements within Government to create a singular State input to the final document.

3.4. Practical experience for officials and advisors - A recent report on the same State Agencies showed a considerable lack of relevant expertise within the Public Services on specialist areas, creating a dependence on consultants and external advisors (eg; Accountancy firms who then employed international consultants of different disciplines). All at considerable cost to the State, to facilitate officials to advise a relevant Minister through a bought in external expertise. It would be a distinct advantage if officials taking on a brief to do with road haulage, actually took some time working with licensed hauliers and got some direct experience of the issues impacting on the sector. This current induction process for officials has to cease with **officials having to have expertise and direct awareness of their brief before being appointed or being required to go on a specific training (CPD) and awareness programme to equip them to support public policy for the sector**. Coupled to this should be an end to institutional suspicion and a **greater reliance and trust on the relevant industry representatives** for expert input and data to inform the appropriate Department. Regrettably the IRHA has found that much of its contribution to many group discussions around Brexit was largely ignored or lightly entertained, with time proving the input to be very relevant and of value. A very good example of this was the IMDO report 2020, on Ireland's shipping requirements post Brexit. The IRHA argued against its findings and presented a different set of data and probable outcomes to the Dept of Transport. The IRHA has been proven correct on the IMDO analysis and this input was provided free to the State.

3.5. Revise the Driver Training Directive, as amended by Directive 2018/645, to widen possibilities for on-line training, including a full on-line training and exams during long-term emergency situations.

3.6. The State needs to agree at both EU and national (IRL) levels **emergency and contingency freight transport plans** in anticipation of future emergencies similar to COVID-19, to ensure the full resilience of supply chains. In such plans, apart from the current and standardized measures regarding essential legislation for an emergency, additional facilitation measures for Customs, Ports, shipping etc, would also be triggered in the case of an emergency. The extension of individual and control documents validity, as well as driving and rest time (flexibilities allowed under Article 14 of Regulation 561) and

cabotage rules, also need to be considered. As part of such a plan, Ireland needs to advocate at EU level to negotiate with the UK a common approach, in the case for a similar emergency situation.

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MAKING ROAD FREIGHT SAFER (ROAD SAFETY REGULATION AND ROAD INFRASTRUCTURE)

For the purposes of this submission, the IRHA will address, the subject of making road freight safer by dealing with this important and extensive topic under three headings:

- *people and equipment deployed,*
- *the infrastructure being used,*
- *the regulation of both.*

1. People and equipment

(a) The **modern HGV available today** has as standard features, EBS. (Electronic Brake Systems), EBA (Emergency Brake Assist), ESF (Electronic Stability Function), LDW (Lane Departure Warning), proximity warnings, safety coupling devices, Generation 1 and 2 digital tachographs along with more internal safety features to protect the vehicle and other road users. With 45% of our national fleet over 10 years old, the upgrading of the national fleet again raises its head as an immediate requirement to deliver carbon reductions and improved road safety for all.

(b) **Regarding people and the staff** at the front line, the obvious route to improved road safety is training. The delivery and oversight of the Mandatory **CPC Training** (Certificate of Professional Competence) for all HGV truck and bus drivers rests with the Road Safety Authority. As currently presented and delivered, the CPC training is extremely poor and not fit for purpose. Drivers describe it as a waste of time, money and an insult to any driver who is forced to attend to maintain their ability to work. This has been the case since its inception in 2008 with little to no improvement since. The IRHA believes that this mandatory annual training has directly contributed to the loss of existing drivers from the sector while also being a barrier to new recruits including license holders, who wish to resume driving. There is room within the [2018/645 Directive on the periodic training of drivers](#) for the Irish CPC course to be far more relevant and practical as well as having much of the content delivered on-line and hence in a driver's first language. To date the RSA has refused to pursue such a route and shows no indication of any change.

The IRHA lobbied successfully in Brussels for an updated Driver CPC which was implemented in 2018, which included ECO and SAFE Driving. To date, the RSA has failed to act on these updates.

In response to this lack of action by the RSA, the IRHA, in trying to make the CPC relevant and to give it value, have developed alongside two of Ireland's ETBs, an accredited 3-day **upskilling course** to help in driver training for the modern digital era, which is titled "Certificate in Digital Assisted Eco-Driving (HGV) Level 5, Special Purpose Award".

Please see more at <https://smartdriving.ie/home/>.

The IRHA, is seeking for this course to be officially acknowledged as being the equivalent of 2 CPC modules, to help in its roll-out and delivery.

(c) With regard to **initial training**, which we support (and argue that those willing to become professional drivers must be able to start their training before 18 years, so that they can start driving when becoming 18), an anomaly in our licensing system which needs addressing is the continued ability of a 16-year-old to have a license to drive a modern tractor without any training. The same youth might only be driving a Honda 50 to go to work due to the restrictive nature of motorbike licenses, to then legally get into a 3-metre wide, 500 HP tractor that can weigh 22 tonnes with ballast and then proceed down a country road at 50 Km/Hr. It is extraordinary in its lack of regard for road safety.

2. Infrastructure

The infrastructure includes our road network and its oversight. With only 1% by distance of Ireland's road network being designated as motorway, most of Ireland's driving is off motorway on our national and regional roads.

The IRHA, with a view to raising a serious road safety issue, has made a video around the ditches and hedges/trees issue that border most of our roads and the negative effect these have on road safety for all road users. Please read below before watching the video at the following link: <https://www.youtube.com/watch?v=5D9vjKqgIns#action=share>

HISTORY:

Many of us can remember the Austin A40 car, which was 59 inches wide.

Or the Ford Corsair (a big car) was 63 inches wide.

Or the Ford Granada (a massive car) was 68 inches wide.

TODAY

A Ford Fiesta (a small car) is 68 inches wide (same as the Granada).

A BMW 5 Series is 73 inches wide.

A BMW 7 series is 75 inches wide.

Passenger vehicles width has increased by approximately 6 inches over the last 40 years while our roads became a foot narrower for passing vehicles i.e. cars. In the case of trucks and tractors the increase in width is greater. This means increased incidents.

Our ditches therefore, need to be better maintained to full height, with removal at bends improving sight lines. This should be a national priority, as should the licence issue for tractors.

Vehicle evolution and new maximum allowable widths has put the traffic collectively beyond the capacity of much of our road network. Cutting back or maintaining the borders/ditches would greatly improve this situation.

Not only should the maintenance of the ditches be improved but many should be removed, in particular at bends, to get rid of the "Blind Bends" that are being dealt with by all road users. To see an opposite scenario, just drive up to the North of Ireland on the back roads, the change is immediate and impacts on how relaxing driving becomes. Why? Because the ditches are low and set back from the road meaning you can now see what's in front of you and coming at you.

3. Regulation

The RSA (Road Safety Authority) is the regulatory authority for the road transport sector. The operation of this authority over the transport sector should be collaborative while based on mutual respect. This is not the case at the moment. The RSA sees fit to apply its authority in a strong-arm authoritative manner rather than in a constructive and collaborative approach to the many issues the industry faces daily.

The IRHA would like to draw attention to the RSA CVRT workshop manual, which the garages use as their guidebook for testing commercial vehicles. For simplification, we have done a summary of the

application of this considerable manual or guidebook to demonstrate the heavy handed classification of practically any fault found as MAJOR or DANGEROUS⁶.

Such a heavy classification system not only affects a transport operator's risk rating but by extension leads to the industry being misrepresented by the RSA to national bodies or within the EU. This is the reason why the IRHA wishes to highlight the RSA approach as it feeds the portrayal of the haulage industry through data, presented by the RSA does not reflect the reality of safe practices on the ground. We very much challenge the classification process operated by the RSA of itself but also in its application being without any right of appeal or 3rd party reference. Please see some examples reported to the IRHA below;

1. A Cork Haulier reported to the IRHA, that at a RSA roadside checkpoint determined a damaged tyre on his vehicle made it unsafe ie MAJOR FAIL. A tyre had to be fitted to the vehicle on the roadside, before the vehicle was allowed to move. The haulier got the tyre back to the manufacturer who confirmed the tyre was fit to use and passed its inspection. The driver got points on his license and the haulier had their risk rating impacted, potentially having insurance implications and issues on Haulage License renewal.

2. [A Kilkenny](#) Haulier at a roadside inspection had a damaged inside tyre on the drive axle. The driver on doing his walkaround that morning failed to see it as dark and possibly on the underside. The result was 3 points on the Driver's license whereupon he left the industry as his qualification/license was too fragile and could be lost under such policing. A MAJOR FAIL for the haulier, damaged risk rating with potential implications as above.

3. A Laois haulier brought 3 brake discs to an IRHA meeting which he claimed were good, but failed in a CVRT test on one of his trailers. He recorded 3 MAJOR FAILS as a consequence, but with the discs seeming ok, we sent them back to the manufacturer through the import agent. They were confirmed as within tolerance and fit to use. Another case of unnecessary cost stress and reputational damage done due to a heavy classification of most all mechanical issues with an over zealous CVRT Garage approach due to the heavy oversight by the RSA on these garages also.

4. A Waterford haulier had a HGV in for an ADR Test but with only 2 months left on its CVRT Test, a CVRT also had to be applied. So with an unanticipated CVRT Test on the vehicle and with no pre test work done, the vehicle in question recorded 4 MAJOR FAILS. The haulier in question had a 100% Risk Rating which took much effort to achieve but was shocked to discover that his risk rating was now undone by 4 minor issues, albeit recorded as MAJOR Fails. They have since informed their customers of this outcome, explaining they will no longer be referencing their Risk Rating, its credibility now undone to this operator not previously realising how fragile a high score was to minor issues.

As the examples above indicate, the RSA HAS ISSUED RISK RATINGS BASED ON ERRONEOUS OR NO INFORMATION AND WHEN CHALLENGED HAS FAILED TO ACKNOWLEDGE OR EXPLAIN IN ANY WAY THE BASIS OF THIS SYSTEM.

These Risk ratings can impact an operator's insurance cost, their ability to renew a haulage licence or be referenced in a legal case and yet the RSA refuses to engage on its methodology ,application or provide any appeal mechanism.

The above examples and many more show how difficult it can be for a compliant haulier to operate whilst trying to maintain "Good repute". It is especially so for the conscientious haulier who strives to

⁶

https://mail.google.com/mail/u/0?ui=2&ik=eb6776a750&attid=0.4&permmsgid=msg-f:1664399145476021921&th=17192234568fdea1&view=att&disp=safe&realattid=f_k96y9oeb3.

do it right as **no appeals process** is in place with no arbitration or 3rd party oversight of this regulatory regime. The operators in the above examples had no option but to accept the negative outcome regardless of how incorrect or unfair the ruling was.

As a result, many hauliers believe that as concerns the RSA, the DEFAULT position is GUILTY with no right of appeal.

The IRHA are including this in our submission as we wish to address the RSA categorisation of the industry based on these classifications. We do not condone any illegal or unsafe practices but these heavy enforcement tactics only undo the efforts of the legitimate haulier, whilst feeding a narrative of "cowboy hauliers", which we very much challenge. Our challenge to this regime is such, the IRHA has again found itself back in Brussels, pursuing procedural change on risk rating, as none is forthcoming within Ireland.

Our pursuits are for the RISK RATING SYSTEM, as the guarantee of transparency and fair appeal procedures, to create a system supported by incentives, to develop an absolute system allowing the possibility for ANY haulier to achieve a green status, to adjust the imposition of infringements to reflect fleet size and to realign the weight of Infringements.

If the above are achieved, it would mean the commercial transport sector being better represented by infringement data with incentives in place for the more compliant hauliers. This would be a significant step forward in road safety, which is the purpose of this submission and is the reason for its inclusion.

In the absence of adjustments to the Risk Rating System the IRHA believes that there should be a root and branch review of the operations and role of the RSA in regulating commercial transport, to determine its effectiveness, professionalism, consistency and value for money. This could usefully be carried out by the Comptroller and Auditor General.

4. IRHA requests to improve road safety

- **Support for the industry to upgrade to the most modern vehicles available.**
- **To help the industry educate cyclists as to the dangerous dynamics in the proximity of HGV's.**
- **The RSA to support the IRU proposal on Risk Rating system changes.**
- **The RSA to support the ECO/SMART Driving initiative by accrediting any Driver who completes the 3 days with having completed 2 CPC Modules.**
- **Match Speed Limits with the road and traffic volumes.** Too many mismatches creating dangerous situations e.g. M7 and M3 onto M50 at 30 km/hr.
- **To impose a Maximum height on works done on Roundabouts to ensure vision isn't impeded.**
- **The State should support the IRHA initiative in Brussels for License category changes.**
- **Promoting the IRU/IRHA Driver's Charter, to be signed by operators and shippers in Ireland (<https://support-our-drivers.org/>).**

LABOUR SKILLS AND MARKETING

1. Introduction

The Transport industry suffers from a lack of trained and willing personnel, primarily truck drivers. The situation is similar in many developed countries, with the UK seeking 78,000 truck drivers, and Germany claiming that only 25% of the considerable numbers of retiring HGV drivers per annum are being replaced by new recruits.

In Ireland in 2019, there was a need for 3,000 to 4,000 drivers, but with so many drivers at retirement age and a now growing economy the industry will need double that number over the next 5 years.

To that end the IRHA have engaged with many ETB's around the Country with a view to rolling out a Traineeship nationwide. This was on track to happen pre-Covid and is now again a work in progress.

Please see below the status of the Traineeship currently, demonstrating that the issue of driver testing is now the biggest hurdle to a prompt delivery of any driver training program. **The latest update is that 7 ETBs will be delivering the Traineeship with nearly 100 Trainees to be linked up with Haulage Companies before October.**

2. Progress made so far

Waterford/Wexford ETB (see [promotion link](#)): WWETB was the first ETB to offer and deliver the HGV Traineeship course. To date it has delivered 118 drivers to the industry with 16 participants currently on a course in Gorey (7) and Dungarvan (9).

Approximately 85% of all who register for the course complete it in full. They have a further 2 courses scheduled to commence during June and July this year with a capacity of 9 participants on each course.

However participants are finding it very difficult to get their learner permit category C due to Covid restrictions and Prometric centres closed. This theory test is now available to complete online, so hopefully this will resolve this issue.

Limerick Clare ETB: LCETB who were to take on and deliver the Traineeship pre-Covid, have now suspended all their driving programs due to the inability to get test dates for the training candidates. They will revert when the testing situation changes.

Mayo/Sligo/Leitrim ETB: MSL ETB have run the Traineeship which was a steep learning curve for all involved, including the 2 local hauliers who supported the program throughout. Another course is to commence in September with the intention of linking a trainee with a haulier from the start. This hopefully will lead to a qualified driver at the end with greater knowledge of the industry, its language and its requirements. By making this link at the beginning, the intention is that the trainees, in giving some time to the haulage company during their training, will slot straight in on completion of the Traineeship.

Cork ETB: CETB with whom the IRHA had several meetings, stuck with their short driving courses and did not pursue the Traineeship model as they wanted to get as many through as possible in as short a timeframe. Their target was 40 per year which would go to 20 through the Traineeship. Once we have the Traineeship re-established post-Covid and figures on completion and placement confirmed we will knock on this door again. We will then approach the local hauliers to help in this process, possibly replicating the intention above in Mayo/Sligo/Leitrim.

Kilkenny/Carlow: KC ETB prior to Covid were on track to launch the Traineeship in September 2020, having had 2 meetings with the ETB management with local hauliers. They are still very enthusiastic for the Traineeship to be available in the Kilkenny/Carlow area and we will be meeting soon in this regard.

Kildare/Wicklow ETB: KW ETB, similar to KC ETB, were very keen to provide the Traineeship course pre-Covid. Currently they are only offering the short driving courses, but the IRHA are in talks regarding the Traineeship, about which they are interested.

Laois/Offaly: LO ETB currently are finishing a group of 6 trainees in a haphazard manner due to their inability to get driving tests. They related their endless frustrations with trying to run a coordinated training program without being able to control the driving test dates. Direct contact with the RSA in Ballina proved fruitless and only added to their frustration. Their intention is to run a course again in August post-Covid but the trainer currently is unsure if they can take it on. The enthusiasm and willingness is there but the barriers to progress are with the State.

Galway/Roscommon ETB: GR ETB were on board to deliver the Traineeship in late 2019/2020 after several meetings were held which included 3 local hauliers. It did not happen as planned in 2020 and then Covid stalled any further progress. They recently confirmed they do not intend running a Traineeship course this year but will look at it again next year.

Cavan/Monaghan ETB: CM ETB had a Traineeship course running since January, when the Covid restrictions were imposed, so although the course was on hold, it is due to restart shortly. When this course finishes the date for the next professional HGV Traineeship will be announced. Trainees will soon be available for work placement initial roll out.

Donegal ETB, Louth/Meath ETB and Tipperary ETB are also in the wings and are interested from previous contact, but the current crop above, with whom work has been done, should be better consolidated through greater member involvement before more ETBs are approached. They have not been approached as part of this appraisal.

- All the ETB's who responded along with the training partners have expressed their frustration with the delivery of the driving test by the RSA, as well as the GDPR controls around the process, making it extremely difficult for a third Party to arrange block bookings at a time/date to suit a training program. We will communicate this up the line along with the poor response from the RSA to the ETB's.
- A lot has been achieved with the Traineeship with over 150 new drivers available to the industry, in spite of Covid. With increased ETB roll out and greater local transport industry engagement, this could reach 300 to 400 drivers per year with the potential for more.
- The IRHA are also keeping the insurance bodies and their underwriters informed of developments as we continue to push for some acknowledgement for this initiative, by being able to get young people onto a policy, due to the nature of the course.
- Another initiative, the IRHA are pursuing both in Brussels and Dublin is to allow the asylum seekers to pursue and hold driving licences, thereby potentially allowing them to join a professional HGV Traineeship course near them. In Ireland we have 7,000 Asylum seekers (including women and children), so the potential must be for at least 1,000 drivers from this pool, if the right structure is put in place (especially in terms of work authorization and integration support). It is fair to say that regardless of where they come from and their achievements to date, many of these men and women can drive and could through the traineeship be afforded an excellent opportunity to earn a wage and look after their families. The IRU is making a submission on this behalf in Brussels, with Dublin

working on the legislation to accommodate people of such a status to hold a driving licence. Another work in progress.

3. IRHA initiatives

ECO DRIVING: This initiative which is titled “Certificate in Digital Assisted Eco-Driving (HGV) Level 5, Special Purpose Award” was referenced above.

Please see also <https://smartdriving.ie/home/>. We, in the IRHA, are seeking for this course to be the equivalent of 2 CPC modules to help in its roll out and delivery.

DRIVER LICENSE INITIATIVE: In response to an EU initiative on Driving licence categorisation change and harmonisation, the IRHA have made a proposal which was well received by DG MOVE in Brussels and is now IRU policy on behalf of its EU members. This not only has potential social implications for our unemployed youth but it could also contribute to a fresh fully trained population entering the industry, which in contrast to the traditional route for new entrants should have a positive road safety outcome.

For additional information, please see the contribution of the Irish Road Haulage Association to the IIA on Driving Licence at the link below:

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12978-Revision-de-la-directive-relative-au-permis-de-conduire/F2327116_fr

4. IRHA requests on training and education issues

The IRHA therefore requests that the Department of Education ensure that students, teachers and career guidance staff are all familiar with the **vocational offerings available through our ETB's** and that the endless pursuit of 3rd level by our 2nd level students and their parents, be tempered through an increased vocational pursuit. We currently have 75% of our 2nd level students going on to 3rd level, which is 3 times the level in Germany, while only 30% of these students on completion of 3rd level get work within their educational sphere. There is also a 40% drop out in year 1.

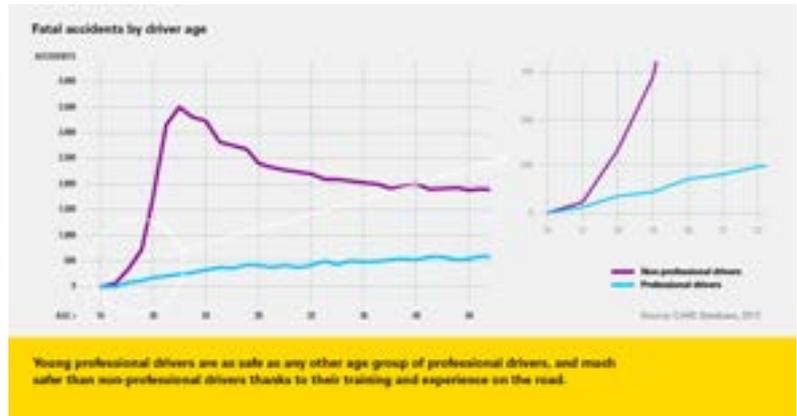
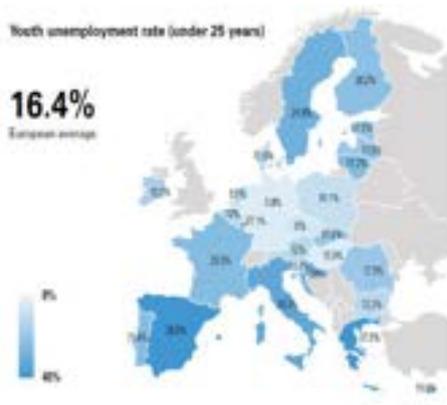
The shortage of skilled workers across many sectors, including transport, needs to be addressed in this way, combined with making **immigrants** and asylum seekers available for training, by the accelerated issuing of visas, permits and licences.

Creating a public (RSA)-private (IRHA) Service Level Agreement to ensure **fair treatment of drivers** during roadside checks should also be pursued.

5. IN FOCUS: Addressing youth unemployment by facilitating access to the driver's profession

The shortage of drivers remains a major issue for the road transport industry in Ireland and across Europe, coupled with an increasing average age of professional drivers, which in some cases is already going beyond 50-ies.

Challenging working conditions, further exacerbated by the pandemic, and difficulties attracting women and in particular young people to the profession, at the background of a persisting and even raising unemployment rates among young people, are the main reasons for these labour shortages.



Source: IRU, 2021

The situation is expected to further worsen with the post-Covid recovery, reaching quickly the pre-Covid rates of +20% unfilled positions in road haulage, coupled with a constantly increasing average age of those occupied in road haulage, with in some EU Member States already reaching 50 years.

In 2019, there was a need for 3,000 to 4,000 truck drivers, but with so many drivers at retirement age and a now growing economy the industry will need double that number over the next 5 years. To that end the IRHA have engaged with many ETB's around the country with a view to rolling out a traineeship nationwide. This was on track to happen pre-Covid and is now again a work in progress. Please see below a status of the traineeship currently, wherein you will see the issue of driver testing is now the biggest hurdle to a prompt delivery of any driver training program.

The industry at EU level has taken the initiative at global and Irish level, by adopting (2019) a dedicated multi-year [programme](#) to address driver shortage, with short-, medium-, and long-term measures.

Amongst the most salient results so far are:

- the [Driver Charter](#), agreed upon between the industry and the representative organisations of shippers and trade unions, open for signature by any interested stakeholder;
- the concrete proposals to bridge the gap between school and wheel, including [proposals](#) to address the minimum age of professional drivers within the expected revision of the EU Driving Licence Directive, such as the possibility to start truck drivers vocational training before the age of 18, as well as to adapt the driving licences A and AM, to allow young people of 16 years, to be able to drive small electric delivery vans in city delivery;
- a planned (2021) negotiation with the organisations representing the enforcement authorities at EU level, to establish a Service Level Agreement (SLA), to improve, harmonise and facilitate roadside checks in an industry-friendly way.

This critical situation, with an alarming and constantly increasing shortage of drivers, coupled with the challenges posed by rapidly increasing automation, will require further joint efforts by industry and Governments, to better understand, accompany and manage the process in the coming 10-15 years, up to 2035, when automation is expected to be the norm.

6. ISSUES of CONCERN

6.1. Modal shift to railways

The consultation document correctly notes that rail freight is a minor player in the overall current freight market in Ireland. This will remain the position as a consequence of a range of considerations:

- Numerous international studies cite 300km as being the distance by rail required to justify moving freight from road when the additional handling required at both ends is considered, within this modal shift.
- Due to a lack of investment to date in the rail system, we have no rail links to ANY industrial bases, thereby requiring all freight movements by rail to involve an element of road transport.
- It is of note that EU funded rail freight infrastructure (including Aumund container gantries) installed in the late 1990s to provide container handling infrastructure was systematically scrapped by Irish Rail in the meantime. Irish Rail have demonstrated little real appetite or strategic intent to support rail freight or to facilitate connection between rail freight and road transport.
- Currently, for all road freight going from A to B, the truck most often carries a backload to point B or C/D/E/F on its route home, or could do a triangular movement of 3 loads. Rail freight does not offer this flexibility thereby possibly increasing the cost of some current road movements as less loads are available, thereby making the road freight system less efficient.
- The Irish road freight system is privately owned and run, delivering a 24/7 service to all industries within and without Ireland, thereby enabling the Irish economy to function. The work practices of the current rail operators in Ireland do not align very well with the operational efficiencies and output of the road freight system. To try to link one freight mode with the other is to make our current road freight model less efficient, possibly increasing total transport costs to many of our current customers and industries.

It has also to be said that the historic control of Ireland's transport industry by CIE with State support, not only distorted the market, but it has for years stymied the development of the private transport industry. The industry thankfully overcame these obstacles helped by our membership of the EEC and its competition laws. To witness an increasing control or influence on the transport sector by CIE/Ianrod Eireann considering their financial performance, their poor track record on efficiency, delivery of service and value for money, would be an issue of concern to the IRHA.

6.2. Enforcement and addressing non-compliance by rogue operators

One of the most disheartening elements for any lawful businessperson is to see their efforts at compliance undermined by competitors operating with effective impunity. One consistent complaint from IRHA members is that some of the enforcement authorities in Ireland operate a zero tolerance regulatory approach to compliant Irish drivers, but are less exacting in their enforcement of the relevant rules with non Irish or non compliant hauliers.

A recent case of a Northern Irish operator who was brought to our courts by An Gardaí/RSA after shedding their load, was found to have no Operators License, No Driving License, No Insurance, No CVRT for truck and trailer and yet not only had all their equipment returned but were fined 200 Euro.

6.3. Drivers Licence to work

The qualification document i.e. the Driving Licence, held by a HGV Driver, is their means to having an income to provide for them and their families. The level of policing on our roads is beyond what is to be experienced in any other EU State. And when coupled to the heavy handed manner of enforcement by

the RSA, as referenced above, many drivers are leaving the industry due to a fear of losing their licence impacting on their ability to drive ANY vehicle, including a car.

Many transport operators move freight in a 3rd party trailer owned by another operator or large freight forwarder. At a roadside check the driver is held accountable for a trailer that they may have never seen prior to pick up and is not owned by their employer. While the IRHA is not looking for any reduction in the pursuit of road safety, the targeting of drivers is misplaced and is working against the front line staff.

The drivers and their licences need therefore some level of protection whilst in the commercial working environment, to ensure they are not the victims of others' incompetence.

6.4. Exceptional Loads (Convoy Exceptionelle)

A load movement that requires a PERMIT in its current form is dysfunctional and without structure, denying a transport operator a definite model to allow them to price or tender for a job knowing exactly what any State costs, including Garda escorts, will be. It is a minefield of inconsistency and arbitrary figures with no State entity either controlling the process or of defining it.

This needs to be addressed as a matter of urgency.

6.5 Business Costs

Business costs which impact directly on the road haulage sector directly impact on Ireland's competitiveness and the cost for the provision of haulage services for businesses and consumers. The Government, through Departments and relevant agencies, needs to recognise that the road haulage sector is a low margin and highly competitive sector. There is no capacity of the sector to absorb increased business costs and if operators are forced to run their businesses at loss making levels, they will not continue in business.

The State needs to target the reduction on key business costs impacting on the road haulage sector, and take direct steps to prevent the imposition of any new State imposed or levied charges. While some costs such as Insurance impact on many sectors and need a general focus, there are specific charges that directly hit licensed hauliers and which they cannot sustain being increased – these include increased fuel, labour, transport (tolling) and environmental charges. The 10 Year Strategy needs to recognise the reality of this low margin business and take focused steps to reduce costs further.

IRHA CONCLUSIONS TO THE STRATEGY DOCUMENT & PROPOSALS

1. OVERALL CONCLUSIONS

Due to our island status, our economy is more dependent than most on the indigenous transport industry. The process of **setting out an agreed road haulage strategy for the next 10 years is both welcome and necessary**. In our submission, we have highlighted the many initiatives we have both been involved in and have pursued, for the benefit of both the industry and the State. We see this process as hopefully being the means of pursuing and delivering some, if not all of the many initiatives within.

The **climate challenge** is stark and one the State has committed to, hence its significant consideration within this submission. For the Transport sector to date, no foundation has been laid through incentives or operational advantage to steer and educate the sector about any emissions reduction, save for the pursuit of CNG through Project Causeway. Ireland's fleet is and will remain for some time yet, a diesel one, so the IRHA sees it as an imperative that the State gives a form of support to the upgrading of the

national fleet to the Euro VI version of this powertrain, it being the best available transition measure. This would also help the industry better prepare for the significant shift in the energy source that will be utilised as we approach the 2030's. This approach will also bring the aforementioned safety features onto our roads.

Unfortunately, the consultation paper from the Department to inform submissions on the new Strategy is in denial on diesel. As a country we cannot just wish diesel away as regards HGVs. There is no substitutable fuel source for the licensed haulage sector. Therefore, the State needs to recognise this and instead of incentivising new novel fuel sources, needs to direct its efforts to ensure that the use of diesel is achieved in the most environmentally sustainable way – through a national fleet upgrade to Euro VI. Modernising the fleet in this way will deliver emissions reductions targets for the sector.

We have also discussed the **Covid** and **Brexit** learning curve, complete with the significant consequences for the State and the Transport industry. To the credit of our operators and drivers and indeed many in our Public Service, the show was kept on the road with little impact on the availability of products, goods and services to our people and economy. The most important point from this is the need for an overseeing body linked to all relevant State entities making for an easier and more efficient process helping the State to react to what lies before it, in a more defined and speedy fashion.

For the operators, the biggest challenge in the short term is **recruiting staff** to keep the wheels moving, not only drivers, but all aspects of the transport chain. The IRHA in its endeavours to recruit people to the sector through the Traineeship, see a considerable disconnection from the vocational sector by our young people. This needs to be addressed at second level through the education process, as this majority pursuit of a 3rd level education, is a challenge to many on “the ground industries” who are dependent on an ongoing supply of people with a vocational skill set and practical qualifications and ability. The pursuit by our youth seems to be singularly academic currently.

On **road safety**, which is a national issue, our submission is relevant to all road users. For it and other contributors to realise any benefit for the population, the focus needs to be less on the driving population and more on the State entities, which have the means and authority to implement the necessary changes to improve the road environment for all road users. Every one of us knows of a "deadly bend" or dangerous rock or tree on the roads we travel, all waiting for the inevitable. A fresh national focus by our Local Authorities, TII, An Gardai, the RSA and the Department of Environment is required here to do a job that is a long time waiting to be done.

2. STRATEGIC PROPOSALS

2.1. On this consultation

The IRHA considers this consultation of utmost importance for the road haulage sector in Ireland. It represents a genuine opportunity for the road haulage sector, its partners and the Government itself to jointly develop, during the second phase of this consultation, a commonly agreed vision, strategy and action plan with concrete short-, medium- and long-term measures for the development of the road haulage sector in Ireland in the coming 10-15 years, with due consideration to the policy priorities at EU level and the specific situation of Ireland as an island and a peripheral EU Member State, with an exceptionally strong reliance on its national road haulage sector for its economy and society to function.

The IRHA therefore proposes to the Government and its partners to create a **national public-private Task Force**, composed of all relevant stakeholders, including industry and the research community, to jointly analyse the contributions of the first consultation stage and put together commonly agreed proposals for a national vision and strategy, to be adopted by the Government, taking into account the EU's Sustainable and Smart Mobility Strategy, but also equally the specificity of Ireland, as an island and peripheral EU Member State. The Task Force

should also make strategic proposals on how best to use the available EU funds and resources, including from the recovery programs, to facilitate the green and digital transition of the Irish road haulage sector.

2.2. On Brexit

Bearing in mind the importance for Ireland of the UK from a trade and road transport and logistics perspective, possibly, a permanent mixed public-private body should be created, to monitor the situation, send early-warning signals and make recommendations to both the Irish Government and the Specialised Committee on Road Transport under the TCA. IRHA and key hauliers are ready and willing to become members of such a body.

In addition, Ireland has to be represented permanently into the TCA Specialised Committee on Road Transport.

It is also proposed that IRHA be granted an observer status in the TCA Specialised Committee on Road Transport.

2.3. On decarbonisation

In essence, it is proposed to work out a national strategy and action plan in two steps:

- step 1 – upgrade the existing fleets and implement the 12 measures proposed by the IRHA above as a “low hanging fruit” approach;
- step 2 – a dedicated strategy and action plan towards a longer term transition to alternative propulsions and vehicles must be elaborated.

We believe that if a substantial number of the proposed “low hanging fruit” actions were implemented during the first phase, market forces would create change, in addition to requirements from the purchaser of transport on operators.

We also believe that:

- An urgent yet serious reflection on the likely impact of **introducing ETS in road transport** needs to be carried out, possibly even at European level, with the involvement of the industry, so that we could anticipate and come up with realistic approaches/proposals.
- The industry could also consider the creation of its own **green label** for member operators, using the experience of other sister associations across the EU.
- A dedicated reflection needs to be carried out on **LCVs**, since their number is roughly 10 times higher than HGVs (in Ireland, but also in other countries). Potentially, it might be exactly this segment that needs to be tackled first in terms of greening and decarbonising, also because the technology and alternative propulsions are or will be available sooner for LCVs. The issue of refuelling infrastructure has to be addressed as well. In its Climate Bill submission, the IRHA has placed the emphasis on Euro VI and VII promotion. Yet, with the development of technology and refuelling infrastructure, potentially larger vehicles, i.e. up to 10-12 tonnes might also become soon within the range of alternative fuels and commercially viable.

2.4. On road safety

The IRHA proposes to the Government to develop, in partnership with the road haulage industry, a national strategy and a multi-year action plan to further enhance and improve road safety in the road haulage sector in Ireland, based on the following main pillars:

- **Investment:** Develop a set of targeted Government incentives, for example adjusting taxes, tolls, permits and subsidies, to allow road haulage operators to make investment in greener and safer vehicles more viable for them.
- **Training:** Advocate at EU level and invest at national level into developing a dedicated state of the art safety modules for initial and periodic training of drivers, as well as to renew vehicles used for training purposes. At the same time, develop a national awareness programme for all private car users, to raise

their awareness upon and learn how to behave on public roads (as part of their driving lessons curriculum and exam), together with large commercial vehicles.

- **As a matter of short-term priority**, officially acknowledge the IRHA-initiated Certificate in Digital Assisted Eco-Driving (HGV) Level 5, Special Purpose Award, as being the equivalent of two CPC modules to help in its roll out and delivery.
- Advocate at EU level and develop a **national programme to digitalise enforcement and control documents**, with the objective to remove paper documents from roadside controls by 2025, and develop a system allowing part of the checks at premises to be carried out from a distance.
- Instruct the Road Safety Authority to develop, in partnership with the IRHA, a **joint code of practice on enforcement in the digital age, and a dedicated Service Level Agreement**, to establish standards for drivers and enforcers on roadside checks. **As a matter of short-term priority**, revise the Risk rating system: to guarantee access to information, transparency, and fair appeal procedures, and transforming the system into one based on merits and incentives, allowing all hauliers to achieve Green status, whilst at the same time adjusting the imposition of infringements to reflect fleet size and to realign the weight of Infringements.
- Accede to the protocol on the e-CMR.

2.5. On integrated planning and intermodal transport

Cities (as hubs) and ports (as interfaces) are key elements of Ireland's infrastructure system. The IRHA, therefore, submits the following proposals to address a selection of key issues:

- Negotiate (IRHA and Irish cities) an agreement (good practice charter) on urban deliveries and urban access restrictions, based on the principles of technological neutrality and targeting specific outcomes, rather than technology itself, and bearing also in mind that diesel will remain the only available alternative for road haulage in the foreseeable 10 years.
- Start by proposing to the Dublin City Council to review the Dublin City HGV Management Strategy, with the objective to provide incentives for greener commercial vehicles, in line with IRHA Climate Bill submission.
- Regarding the intermodal strategy, address (as a Government strategy) also the issue of EU mainland ports used by Irish hauliers and the need for facilitation measures, such as the review of weekend traffic bans in France on key corridors for Irish import/export.

The IRHA would also like to re-emphasise its position taken in its Climate Bill 2021 submission about the lack of economic rationale for an efficient use of combined rail-road transport services in Ireland, due to short distances.

2.6. On the shortage of drivers and skills

Bearing in mind the size of the driver/skill shortages and the threat it represents not just for the road transport industry, but also for the Irish supply chains and economy as a whole, it is proposed to launch an ad-hoc public-private reflection group, with the objective to work out (during 1 year) a national strategy and action plan (with short-, medium-, and long-term measures) to address the issue of labour and skills' shortages, current and upcoming, covering at least the following main areas:

- Access to the driver's profession and **training**, including funding of training, and improving existing and acquiring new skills;
- Attracting divergent workforce in the sector, including **young people, women and migrants**, and recruitment and retention of talents;

- Improving the **image and perception of the industry**, including among young people and in schools, including also early school-leavers, who should be able to engage in a path of change to obtain appropriate driving licences;
- Identifying potential good practices in Ireland, such as the IRHA's work on the Traineeship, including on how best to fund training that might be relevant in the Irish context;
- Adapting to future technological and society challenges, including digitalisation and automation.

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The IRHA takes the opportunity to thank Minister Hildegard Naughton and her colleagues in the Department of Transport for this opportunity. We hope this submission will be seen in the light of its intent: to make transport greener and more efficient while helping make our roads safer, all in a more collaborative approach with our State regulatory Authorities. Hopefully to the benefit of all.



10-year Road Haulage Strategy Submission



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Importance of the Road Haulage Industry

The open nature of the Irish economy, with high levels of trade (exports and imports), combined with Ireland's geographical peripheral location, means that achieving excellence in freight transport and logistics is vital for enterprise competitiveness and attracting inward investment. Goods freight is transported by a combination of sea, road, air, and rail transport modes. Freight Transport, distribution, and logistics skills are critical within the current pandemic and post-Brexit trading environments.

Access to markets is a main factor for companies in deciding which region to locate. The FTDL sector is an essential enabler of economic growth. Around 80% of Irish manufacturing output is exported, including much of the production of the 1,000 multinational companies (MNCs) located here. Companies often have complex supply chains and operating them optimally is a challenging task. Freight transport comprises a significant component of the total supply-chain cost.

Multinational companies based here engaged in ICT, Biopharma, and Medical Devices activities often share the supply chain network of their parent company. There is potential for them to build up their global supply chain operation capability in Ireland. Large Irish Agri-food companies have well-developed supply chain operations. Many SMEs have single-source supply chain operations, especially with the UK, that need to be diversified by strengthening their supply chain management capability.

The Irish Road freight sector is served by a combination of well-known MNCs and large domestic providers, and many smaller operators. Enterprises that are focused on business activities such as food companies and multiple retailers may have in-house road freight operation to ensure quality and consistency of supply to their customers.

The Irish Road Haulage sector employs around 50,000 employees, including 25,000 HGV drivers. 159 million tonnes of Irish freight per annum is transported by road, including the safe and efficient transportation of food, goods, medicines, fuel, and pharmaceuticals so essential during the Covid-19 pandemic.

Reducing Co2 Emissions

On 14 July 2021, the European Commission adopted a set of proposals to make the EU's climate, energy, transport, and taxation policies fit for reducing net greenhouse gas emissions by at least 55% by 2030, compared to 1990 levels. Achieving these emission reductions in the next decade is crucial to Europe becoming the world's first climate-neutral continent by 2050 and making the European Green Deal a reality.

All forms of transport account for 20% of Ireland's greenhouse gas emissions, 50% of which is attributable to passenger cars, 25% to trucks, 8% coaches and buses, and 17% aviation/other. Air pollution emitted from transportation contributes to poor local air quality in increased micro-particles and nitrogen oxides, reducing people's quality of life. It is essential that as a cleaner, greener, and more sustainable technology becomes available, it is adopted to reduce the environmental impact of heavy road freight movements.

Comparable UK survey feedback received from training providers and systems suppliers was that only 20% of small transport operations had engaged in ecosystem driving training. Companies with less than five vehicles had undertaken no training. Barriers identified preventing the uptake of eco-driving training were the course's cost, lack of availability, potential driver resistance to training, and a lack of evidence to suggest the benefits.

Evidence from Europe, Asia, and North America suggests that eco-driving can save fuel and reduce emissions in the range of 5% to 15%. Fuel costs are usually one of the most significant expenses, accounting for about 30% to 40% of the total operating costs.

HGV Driver Shortages

The 2019 National Skills Bulletin published by SOLAS indicates that there were 33,000 Truck and Van Drivers in 2018, with employment demand growing by 3.1 % per annum over the previous five years. Employers have identified difficulty in sourcing and retaining qualified HGV drivers, despite many job-ready job seekers who were previously employed in this occupation. Regional issues may also be a factor.

There are a high proportion of older HGV drivers who will be due to retire over the coming five years. The SOLAS Vacancies survey paper Oct 2020 gathered the views of selected recruitment agencies regarding skills in short supply and are proving difficult to fill since the impact of Covid-19 from March 2020. In the transport sector, skill shortages were highlighted for HGV drivers, Mechanics, Logistics Planners, and Supply Chain managers.

The IRU, based in Geneva, represents 3.5 million companies operating in mobility and logistics services in 100 countries. They carry out bi-annual surveys to uncover the facts about HGV driver shortages. Finding from the 2021 survey are highlighted below.

- IRU's annual driver shortage survey has revealed that there is still an alarming shortage of drivers despite reduced demand in 2020 due to Covid-19. Transport companies forecast driver shortages to intensify again in 2021 as economies recover and demand for transport services increases. European companies are expecting a 17% shortfall in drivers in 2021.
- The survey investigated driver shortage, finding that a lack of trained drivers was the main cause in all regions, including Europe. Training and certification remain vital to attract and develop skilled drivers, especially upskilling with new technology, safety expectations, and compliance standards.

- Difficulty in attracting young people into the profession was cited. The percentage of truck drivers in Europe under 25 years was 5%, a fall from 7% the previous year. In addition, the average age of professional truck drivers in Europe was 44 years, while for bus and coach drivers, it was 50 years.
- The IRU anticipates that this demographic trend will only worsen without action to reduce the minimum driver age. Therefore, they advocate that governments set the minimum age for trained drivers at 18, starting from 17 years.
- Challenging working conditions, further exacerbated by the pandemic, and difficulties attracting women to the profession were cited. In addition, the effect of Covid-19 restrictions on professional drivers, especially with the media highlighting their poor treatment at delivery sites and temporary border controls, negatively impacted the profession's attractiveness last year.
- The survey points to mixed results in the industry's quest to attract more women across all parts of the sector. For example, only 2% of truck drivers in Europe are women, reducing from 2.8% the previous year. However, there were encouraging signs with female bus and coach drivers in Europe climbing from 10% to 16% of the total workforce in 2020.
- The IRU state that more investment in safe and secure truck parking areas to fix the current shortfall would make long-haul driver conditions safer and get more people behind the wheel, especially women.

HGV Driver Upskilling Needs

All professional truck drivers must apply for a Driver Certificate of Professional Competence (CPC). Its purpose is to set and maintain high safety standards and driving among drivers of trucks and buses and need to take part in continuous training of one day per year in an RSA-approved training centre to maintain their CPC entitlement. Many employees have low educational attainment and little or no exposure to digital skills training.

Most operators have limited capacity to identify skills needs or to meet the development needs of their employees. The nature of work and skills requirements in the Irish road haulage sector is changing significantly. Half of HGV Drivers have lower secondary level education as their highest level of educational attainment compared to 13% for all those at work. The skills need of professional HGV drivers are rapidly evolving. The upskilling of HGV drivers is essential to keep up with changing skills and knowledge demands.

HGV drivers have specific skills needs arising from:

- **Emerging technology opportunities:** Fleet Telematics which captures data related to how HGV Fleet vehicles are operating and then quickly reports on it, helping operators to manage their fleet and, potentially, their profitability, Predictive Cruise Control,

Advanced Tachographs', AI predictive systems for fuel efficiency and digitisation in everyday driver activity. Real-time location systems and in-cab technology are some of the recent initiatives. A new generation of smart tachographs became mandatory on 15 June 2019. This supports satellite-linked technology, remote roadside checks via wireless, and enhanced security with cryptology in particular.

- **"Transport and Climate Change" actions:** The Government's Climate Change Action Plan identifies the nature and scale of the challenge to moving towards a low carbon economy. It outlines the current state of play across crucial sectors and charts a course of actions towards ambitious decarbonisation targets. Under new EU rules, manufacturers will be required to cut carbon dioxide emissions from new trucks on average by 15% from 2025 and by 30% from 2030, compared with 2019 levels.
- **Impact of Brexit:** Brexit impacts Cross-Border and Rural regions, agri-food, traditional manufacturing and transport, and logistics activities. This can further exacerbate the regional imbalance of economic opportunity. Significant challenges due to BREXIT are border controls (causing delays and resultant increased fuel usage) and increased competition from EU hauliers (using direct ferries to avoid UK/EU customs controls can engage in cabotage operations (EU operators complete 90% of UK haulage).
- **Covid-19 Pandemic and Economic uncertainty:** As a result of the Covid-19 pandemic, many businesses scaled back or ceased trading, resulting in reduced road freight transport demand. HGV drivers were designated as essential workers and were engaged in the crucial transportation of food, goods, medicines, fuel, and pharmaceuticals. With the anticipated recovery of the domestic and international economy, the demand for road freight transport services will gradually increase with more stringent sanitisation practices in place for operators and drivers.
- **EU Mobility Package:** The EU adopted the 'Mobility Package' in July 2020. This consists of three initiatives intended to improve the working conditions of lorry drivers and reduce the risk of unfair competition in the road transport sector. These relate to Driving time, Rest Time Rules, Smart Tachograph V 2; Posting drivers and enforcement requirements; and Road Haulage and Cabotage Rules.
- **Changing Work Practices:** HGV drivers may work locally, nationally, or on long journeys. Some may work with dangerous hazardous loads (i.e., chemicals or LPG) or large loads and require extra training or licences. Others may work transporting livestock, perishable products, or refrigerated container loads. Depending upon variances, there are requirements for dealing with invoices/paperwork, making multiple drops, compliance with various speed and load limits and hours of driving; and knowledge required of care and maintenance of the vehicle, loading and unloading the vehicle, calculating laden weights, using tachograph and fuel efficiency road driving. Road haulage is supported by several non-driving roles, including mechanics and transport planners.

The SMART Driving Programme

The SMART Driving upskilling programme for HGV drivers is a new innovative initiative by Mayo, Sligo, and Leitrim ETB in collaboration with Waterford and Wexford ETB in partnership with the Irish Road Haulage Association. The 3-day upskilling programme encourages HGV drivers to use their vehicles economically and economically to increase fuel efficiency, improve road safety, and lower carbon emissions.

The SMART Driving Programme is an important contribution by Further Education and Training within the National Strategy on Education for Sustainable Development in Ireland. Eco-driving is a series of driving techniques and maintenance procedures to achieve greater vehicle fuel efficiency. It is capable of delivering immediate fuel-saving results.

The benefits of the SMART Driving Programme are:

Benefits for Professional HGV Drivers

- Improved job security and performance.
- Improved health and wellbeing of drivers (reduced stress, fatigue, risk of at-fault traffic and workplace accidents).
- Enhanced satisfaction of driving.
- Improved driver image.
- Increased proficiency in-vehicle control and driving performance.
- Improved driver and road user safety.

Benefits for Road Haulage Operators

- Improved productivity and competitiveness.
- Reduced fuel and operational costs – higher profitability.
- Improved HGV driver retention.
- Potential reduction in insurance premiums.
- The improved resale value of the fleet.
- Improved sustainability and health and safety culture.

Social /Environmental Benefits

- Lower fuel consumption resulting in less use/demand for non-renewable natural resources (petrol/diesel) and reduced CO2 and harmful vehicle emissions.
- Reduced environmental impact, including ambient noise levels.
- Improved driver and road user safety.

Driver and Road and User Safety

Several reports cite Eco-driving contribution to the health and safety culture within an organisation. HGV drivers can develop skills that promote their safety and their vehicle, load, and other road users. The eco-driving style (as promoted by the SMART driving programme for instance: moderating speed, driving smoothly, better observation and anticipation of the situation ahead, and anticipating traffic flow) is correlated with the driving style promoted to reduce accident risk. There is UK evidence of road safety benefits arising from eco-efficient driving with reductions in subsequent accidents rates of between 14% and 35%.

Although there are relatively few collisions between large vehicles and vulnerable road users, when they do occur, they often result in serious injury. HGVs present a particular danger to cyclists when turning left.

The European Commission report on *Traffic Safety Basic Facts 2018, Heavy Good Vehicles and Buses*, indicates that the number of deaths in HGVs fell by 40% between 2007 and 2016. The EU-average fatality rate in accidents in 2016 involving HGVs is 8.1 per million population. The risk of being killed in a road accident involving an HGV is lower in Ireland at 3.6 per million compared to 4.3 in the UK and Poland at 21 per million.

HGV accident causation factors highlighted in a report from samples of accidents in Germany, Italy, The Netherlands, Finland, Sweden, and the UK were as follows:

- Incorrect or incomplete understanding of road conditions or another road user's actions.
- Premature action by drivers before a signal has been given or the required conditions are established.
- Vehicle blind spots, where drivers cannot see part of the road infrastructure or other road users.
- Equipment failure such as vehicle load and poor maintenance.
- The speed is too high for the conditions or manoeuvre being carried out.

The European Transport Safety Council indicates that truck driver fatigue is a significant factor in 20% of HGV accidents. A 2018 report by the European Road Safety Observatory finds that fatigue leads to a deterioration of driving performance, manifesting itself in slower reaction time and diminished steering performance. It references a Dutch survey of 500 truck drivers where factors linked to chronic fatigue were drivers having few possibilities to learn new skills and competences, not taking the time to eat well, sleeping problems, and relative ill health. A UK study indicates that although HGV drivers may be aware of stress and fatigue causal factors, they often ignore that knowledge. For consistent improvements in road safety, the study concludes it is essential that such driver attitudes and behaviours are addressed.

Transport, Logistics and Distribution Sector

In the broader transport, logistics, and distribution sector, there are key skill demands for:

- Knowledge of international product/service design standards, safety and environmental regulations, and packaging for different countries. Sustainable sourcing and supply chain Management skills; customer service / order fulfilment skills.
- Customs clearance procedures, documentation and regulations knowledge for air, road, sea, and rail freight transport including knowledge of freight rates, insurance, customs duties, VAT payments, warehousing procedures, e-business and labelling and packaging requirements particularly for UK trade.
- Logistics planning, data analytical, and project management skills for the on-time delivery, handling, and storage of temperature-sensitive healthcare products and perishable products.
- Transport and owner managers – Fleet Telematics, Digitalisation, knowledge of Euro 6 and Euro 7 emission standards, utilising freight exchange platforms for carriers and freight forwarders.
- HGV drivers upskilling – Eco-driving, digitalisation, handheld devices, safe driving, and well-being.
- HGV service technicians upskilling feeding into the supply of HGV mechanics who are in short supply.
- Warehouse supervisors' and operators' skills- receiving, checking, finding, and loading goods.
- Forklift truck operations – counterbalance, reach and power pallet trucks – theory and practice.
- Knowledge of the work safety protocol on measures to reduce the spread of Covid-19 in workplaces.

Contact Details

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MASTERLINK RESPONSE TO

Public Consultation on Ten-year
Strategy for the Haulage Sector



Ten year Strategy for the Haulage Sector Consultation Document Response Preparation

			Notes
1. COVID-19	1.1	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?	<p>The COVID-19 pandemic highlighted the importance of maintaining a free-flowing supply of goods during a time of national lockdown. Lessons learned include:</p> <p>The need for clarity regarding essential workers and their PPE</p> <ul style="list-style-type: none"> There was a lack of clarity regarding the definition of appropriate PPE for different work environments and activities. Operators in the supply chain and their employees would have benefited from support in undertaking COVID-19 risk assessment and having access to State sources of PPE as essential workers in the supply chain. During the lockdown stages of the pandemic, the definition of 'essential workers' was unclear in some areas – for example supporting service providers such as locksmiths and alarm/security specialists were unsure as to whether they were essential for non-emergency callouts, but were necessary to support supply chain essential services – for example, expansion of warehouse capacity for increased goods traffic. <p>The importance of priority movement of goods</p> <ul style="list-style-type: none"> During times of restricted movement, checkpoints were introduced. These checkpoints severely impacted the free flow of goods transported by both heavy and light goods vehicles, causing both delays to goods arrival and impacting driving hours; consideration should be given to having dedicated lanes for commercial/HGV traffic. <p>The need for flexibility regarding compliance requirements</p> <ul style="list-style-type: none"> The haulage industry is subject to significant compliance overhead – with CPC; CVRT, tachograph requirements etc. all needing to be monitored and adhered to. During a pandemic, there is a need for greater temporary leeway on compliance requirements, to include renewal dates <p>The pandemic unemployment payment (PUP) is a disincentive to work</p> <ul style="list-style-type: none"> The government's generous pandemic unemployment payment (PUP) scheme allowed for measured close down of affected businesses, but in its current blanket format is a disincentive when trying to attract employees back into the workplace.
	1.2	Are there any suggestions for policy support to address the challenges that have been	<p>Suggested policy supports to address these challenges include:</p> <p>Greater clarity regarding emergency planning, including defining essential workers</p> <ul style="list-style-type: none"> There is a need for improved publicly-available information regarding emergency planning for such future scenarios, to reduce industry uncertainty and enable swift reaction times to changes in

	<p>experienced as a result of the COVID-19 pandemic?</p>	<p>operating procedures. This could also support the RSA and other authorities’ response time in making pandemic-related compliance changes quickly.</p> <ul style="list-style-type: none"> ▪ Defining persons in the supply chain as essential workers is key, but it is also important to ensure that relevant supports and benefits are there similar to those made available for frontline workers – for example access to State sources of PPE, childcare, vaccine priority, fuel allowances etc. <p>Assuring priority movement of goods</p> <ul style="list-style-type: none"> ▪ Government policy should have a clear stance and approach on assuring the free flow of goods in the event of a pandemic and be swift in adjusting existing policies in the event of a similar emergency. ▪ Where road access restrictions such as checkpoints are required, priority lanes for commercial and HGV traffic that are sufficiently staffed, with appropriate traffic management, should permit goods vehicles to pass through without delay. ▪ Consideration should be given to implementing reliefs for haulage operators such as temporarily suspending road tolls, abating excise duty on essential worker fuel, providing childcare supports for essential workers and so on. <p>Flexibility regarding compliance</p> <ul style="list-style-type: none"> ▪ Recognising the significant compliance overhead in the industry, consideration should be given to greater clarity regarding relaxing compliance requirements during an emergency, such as: <ul style="list-style-type: none"> ○ Extending drivers’ hours to accommodate extra demands and delays ○ Extending CVRT validity ○ Extending commercial vehicle road tax validity ○ Extending CPC expiry dates ▪ Further consideration should be given to running online CPC training courses, rather than suspending such training altogether during a pandemic. <p>Pandemic supports</p> <ul style="list-style-type: none"> ▪ Any future PUP should be means tested, based on previous earnings to avoid incentivising some workers to remain on the payment any longer than necessary. Priority should be given to supporting essential workers with benefits such as tax breaks or similar, thus encouraging essential workers to continue working. Repatriation of foreign nationals during lockdown and ongoing border restrictions is creating a driver supply issue – consideration should be given to addressing this.
<p>2. Brexit</p>	<p>2.1 What further action or planning is required to help the haulage sector</p>	<p>Simplification and automation</p> <ul style="list-style-type: none"> ▪ The initial weeks and months post-Brexit were challenging due to rigidity of taxation rules interpretation, coupled with IT issues. Further support and clear guidance from Government

		<p>adapt to the changes as a result of Brexit?</p>	<p>required on an ongoing basis regarding compliance. A higher degree of IT systems integration would greater help to streamline the process.</p> <ul style="list-style-type: none"> ▪ Simplification is key - remove complexity and define customs steps clearly and in plain English. Use the AEO and other accreditations that will allow easier movement of goods for approved operators. Public policy should be to promote AEO as an option to speed up the customs clearance process – to support greater uptake amongst supply chain partners. ▪ Consider revisiting the tariff codes and procedures from the perspective of each actor/stakeholder in the logistics sector – examine if opportunities to streamline/automate the process exist and implement them as appropriate. ▪ Improve impact assessment on policy decision making through better/wider consultation
	2.2	<p>How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?</p>	<ul style="list-style-type: none"> ▪ The supply chain will follow the path of least resistance. If no supportive actions are taken by government regarding simplification of UK land bridge trade, then direct ships from mainland Europe to Ireland, taking more time and more cost, will prevail. ▪ The EU/UK relationship will be best supported by communication; simplification; and automation: <ul style="list-style-type: none"> ○ Digitisation of data transfers in a much as possible to minimise delays; and ○ Greater integration of systems between operators and revenue authorities. ▪ The strategy consultation document makes reference to “weekly stakeholder meeting between haulier representatives and the regulatory authorities in the ports (customs, agriculture, and health) in 2021”, but there has been limited visibility of outcome of engagement with industry groups. Consideration should be given to greater transparency regarding such stakeholder consultations.
<p>3. Environmental/ Decarbonisation</p>	<p>3.1 3.2</p>	<p>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?</p>	<p>Infrastructure</p> <p>The supporting refuelling infrastructure needs to be in place on a grand scale in order to encourage a broader take-up of alternative fuel vehicles.</p> <ul style="list-style-type: none"> ▪ Refuelling points are required across the country, installed in both mid-point and destination locations, with appropriately-sized access for HGVs. ▪ Refuelling infrastructure also needs to be suitably specified to minimise time taken to refuel goods vehicles. ▪ Government policy required to specify the number and scale refuelling points as a factor of road metrics – distance, and/or traffic volumes, making it compulsory for existing fuel stations to retrofit alternative fuel facilities and compulsory as part of planning compliance for new fuel stations. <p>Once infrastructure is in place to support a mass take-up of alternative fuel goods vehicles, then public policy can take a two-faceted approach of incentives and targets:</p>

		<p>Incentives</p> <ul style="list-style-type: none"> ▪ Recognising that alternative fuel vehicles have a significantly higher up-front purchase price as compared with traditional fuel vehicles, and that this higher price may not be offset by reduced fuel costs during the serviceable lifetime of the vehicle, incentives are required for the purchase of alternative fuel vehicles. ▪ Consideration could be given to introducing a scrappage allowance to encourage less efficient vehicles to be taken off the road. ▪ Recognising that there is uncertainty regarding new technology, operators need to be certain of residual asset values of newer technology vehicles. A scheme of guaranteed trade-in values would alleviate this concern. <p>Industry targets</p> <ul style="list-style-type: none"> ▪ Consideration could be given to the introduction of targets in the form of percentage alternative fuel vehicles as a proportion of fleet size. Care would need to be taken to ensure that this is proportionate to the size of the business.
3.3	Should eco-driver training be rolled out further, for example, as part of Driver CPC training?	<ul style="list-style-type: none"> ▪ Including eco-driver training in CPC is sensible. The duration of CPC training should be in line with the complexity of the topic and the experience of the driver, with more practical elements where at all possible. For refresher training, consider self-paced online training wherever possible, with material relevant to specific licence classes or vehicle types. ▪ Management of eco driving practices should also be incorporated into Transport Manager CPC to ensure that driver CPC eco practices are encouraged. ▪ CPC training should be aligned with experience of driver and take into account learning difficulties.
3.4	Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?	<ul style="list-style-type: none"> ▪ The logistics consolidation centre model is proven to reduce vehicle movement and works well in an Irish retail context, but implementing it does introduce cost. To be effective in a city context and across multiple transport operators, it would require Government regulation or support.
3.5	How can we work to promote more efficiencies within the sector? Please refer to any best practice examples that you may have come across,	<p>Incentives and targets</p> <ul style="list-style-type: none"> ▪ The sector is incredibly competitive and is a very low margin industry which does not incentivise investment in more eco-friendly practices. Positive action by government could include: <ul style="list-style-type: none"> ○ Encouraging operators to upgrade to cleaner vehicles through incentives to improve carbon outputs. ○ Reducing toll charges to eliminate the practice of goods vehicles avoiding tolls through longer journeys

		<p>whether in Ireland or abroad.</p>	<ul style="list-style-type: none"> ○ Supporting access to IT systems at affordable rates to improve routing efficiency. ○ Deployment of a robust alternative fuel infrastructure to support future goods vehicle refuelling to make practical the take-up of alternative fuel vehicles with lower emissions. ○ Considering incentivising investment in solar panels on rooves of commercial buildings with a Commercial Rates abatement. <ul style="list-style-type: none"> ▪ Operators should have targets that fit with the strategy objectives. For example, an operator with 10 vehicles, at least 1 vehicle, or 10% of combined ELM travelled, should be powered by alternative fuels. Any such targets should only be implemented where the incentives are also in place. <p>Information sharing and awareness</p> <ul style="list-style-type: none"> ▪ Greater consumer awareness that customer demand patterns drive behaviour is required, if environmental efficiencies are sought - a quick supply chain supporting instant consumer gratification results in a greater carbon footprint. This would need to be supported by statistics and validated facts relating to environmental impacts caused by HGV traffic in Ireland. ▪ The industry would benefit from greater policy sharing of EU initiatives – e.g. Sustainable and Smart Mobility Strategy and its objectives and application to Ireland, Green Deal etc. referred to in the strategy consultation document.
<p>4. Road Safety</p>	<p>4.1</p>	<p>What are the road safety priorities in road haulage for the next 10 years?</p>	<p>Infrastructure and facilities</p> <ul style="list-style-type: none"> ▪ An improved road network, both in terms of extent and safety specification. ▪ Improved catering for HGV drivers with rest hubs for drivers with hot showers, refreshments, rest facilities etc. rather than unserviced laybys. <p>Vehicles</p> <ul style="list-style-type: none"> ▪ Safety profile of HGVs ▪ Age profile of HGVs <p>Driver supports</p> <ul style="list-style-type: none"> ▪ Enhanced safety training ▪ Sharing of HGV driver penalty point status between the RSA and potential employers.
	<p>4.2</p>	<p>How are these priorities best addressed?</p>	<p>Infrastructure and facilities</p> <ul style="list-style-type: none"> ▪ Investment in the road network from a safety enhancement perspective ▪ Improve road lighting e.g. significant stretches of M3 motorway have no lighting. ▪ Upgrading all driver rest areas to include facilities of a high standard to support restorative rest periods. <p>Vehicles</p>

		<ul style="list-style-type: none"> ▪ Specify minimum safety specification on new commercial vehicles - e.g. lane assistance, cameras, blind spot assistance etc. ▪ Make automatic gearbox HGVs compulsory – safer and better for environment. ▪ Disincentivise the use of commercial vehicles over a certain age (e.g. 7 years) through increased road tax, more frequent safety checks and more stringent compliance standards. <p>Driver supports</p> <ul style="list-style-type: none"> ▪ Implement an apprenticeship scheme for new drivers – professionalisation of the skill can be an opportunity to enhance safety knowledge. ▪ Permit the completion of driving tests in automatic trucks. ▪ Provide publicly available safety workshops (funded by commercial vehicle road tax) for all staff in the haulage industry – don't rely in in-house efforts funded by individual operators ▪ Mandate the sharing of driver behaviour data (penalty points, incidents, accidents) via a lookup on the RSA website or similar.
4.3	What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?	<ul style="list-style-type: none"> ▪ Improve two-way conversation between RSA and FTA/IRHA and increase engagement and weighted powers to FTA/IRHA, recognising that smaller operators may not be members of an industry association – but still need to be included in consultation processes. ▪ Increased training and supports to educate and display that safe practices does not always mean increased costs or extra work.
4.4	What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?	<ul style="list-style-type: none"> ▪ Any industry supports should be available on an equal basis to operators of all sizes ▪ Consider implementing an RSA-championed industry awards scheme where bronze/silver/gold accreditation is awarded by an independent adjudicator on safety standards and safety performance. ▪ Improve integration through open interfaces between regulatory record keeping systems and fleet management systems. ▪ Hold training and information sharing workshops – ideally incorporating out-of-hours and online scheduling options. ▪ Recognising that Transport Managers are the gateway to practical policy enforcement, consideration should be given to mandating on-going regular training for all Transport Managers (similar to 6 over 6 for x-ray screeners). Anyone in the role of Transport Manager should hold and maintain the Transport Manager CPC qualification.
4.5	Do you have any other comments on road safety matters?	

5. Mobility Package	5.1	What are your views on how Ireland implements the Mobility Package changes?	<ul style="list-style-type: none"> There is a need to digitise all operators and on-road enforcement systems to ensure that non-compliant operators outside of Ireland are not abusing system and undercutting compliant local operators.
	5.2	What are your views on the return of the truck?	<ul style="list-style-type: none"> The return of the truck, if enforced by Irish authorities, should protect the interests of compliant Irish-based operators.
6. Road Infrastructure	6.1	Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?	<ul style="list-style-type: none"> Road safety involves everyone and everything so the maintenance of our roads should be a priority and improved. National infrastructure planning would benefit from taking the freight industry into account. Industry Bodies, such as FTA/IRHA should be encouraged to play a more active role in the planning consultation process. There are countless examples of locations where freight transport and movement of HGVs was not adequately incorporated into the planning process. Improved access, properly designed loading/unloading facilities, well designed manoeuvring space and secure parking should all be taken into account. Where public infrastructure is concerned, rest facilities for drivers could be greatly improved; this would bring a number of significant benefits, not least to the wellbeing of drivers, but also to the safety of the roads. Strategically located HGV refuelling points – particularly for alternative fuels need to be better planned into large scale infrastructure projects.
	6.2	What more is needed in relation to road user charging for freight transport in Ireland?	<ul style="list-style-type: none"> Road user charging represents a significant cost to operators. Consideration should be given to removing/reducing road tolls for goods-carrying HGVs. This reduction could be varied in line with the age of the vehicle, incentivising the use of up-to-date, fuel-efficient vehicles. This would offer the dual benefit for environmental driving on motorway and reduced health and safety risk of large vehicles diverting through local areas to avoid toll gates. Punitive road toll charges for HGVs can encourage some operators off the motorway network onto minor roads, increasing emissions and reducing efficiency. Where road user charging is in place, designated HGV lanes should be put in place with automatic readers for toll tags/ANPR with central billing, rather than cash payments at toll gates.
7. Labour Market/Skills	7.1	How can more people be encouraged to take up work in the road haulage sector, e.g., as HGV drivers, Transport Managers, customs roles,	<ul style="list-style-type: none"> Mandate better pay and conditions for workers in the sector e.g. legislative requirement for drivers' access to facilities when they arrive at a site – hot running water, toilets, fresh food etc. This would increase the attractiveness of the sector and would contribute to driver health and activity levels. It may broaden the appeal of the sector to persons who had previously been put off by the conditions at rest stops.

		etc.? Please provide concrete suggestions/best practice examples.	<ul style="list-style-type: none"> ▪ Currently, new drivers are required to self-fund their licensing costs, which are significant. Operators then find it difficult to secure insurance for drivers under the age of 23. By the time young job-seekers have reached that age, they have sourced alternative employment and commenced their career in the meantime. Improve attractiveness of the market by professionalising the sector - develop apprenticeship schemes for new entrants to roles in the industry. Government support would be required to mandate insurance cover for apprentices in training. ▪ Consideration should be given to extending drivers' hours (while keeping them within a safe range). For example, permitting an additional 5 hours per week would have the equivalent effect of adding 10% new drivers. This would have the dual benefit that drivers have the opportunity to earn more and is a solution to the shortage of drivers in the market.
	7.2	How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?	<ul style="list-style-type: none"> ▪ The pandemic has assisted the industry in demonstrating its value in the economy, but has done little for its appeal. There is a need to target new entrants to the industry, improve gender balance and to promote a healthy work/life balance. ▪ Perception of roles in the sector could be enhanced by professionalising the career path, starting with an apprenticeship, supported by a career path offering opportunities for growth, improving rates of pay and conditions.
	7.3	How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?	<ul style="list-style-type: none"> ▪ Target younger persons as the drivers of the future, with outreach to schools and career guidance counsellors regarding career paths in the industry. ▪ Professionalise careers in the sector through apprenticeships and training programmes leading to a formal qualification and a career path that offers growth potential. ▪ Apprenticeship schemes should span to cover every role in the supply chain network – including the initial acquisition of the category D licence. ▪ Set apprentice and qualified driver wages using Sectoral Employment Orders, similar to that in place for electricians to make such positions more rewarding and therefore more attractive to new entrants; rewarding the level of responsibility and important role that they play in the economy.
8. Intermodal Transport	8.1	Is freight transport being taken into account sufficiently within Ireland's integrated transport planning system, particularly the various transport	<ul style="list-style-type: none"> ▪ Planning decisions should take into account access and manoeuvring for HGV traffic and in particular parking for goods vehicles (and enforcement of such parking) to facilitate loading and unloading. ▪ Improved facilities for commercial and HGV drivers, such as a drivers lounge, safe secure parking, rest rooms with showers; would improve drivers' wellbeing and the safety of all road users.

	strategies for urban areas?	
8.2	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?	<ul style="list-style-type: none"> Optimised use of council real-estate would benefit the more efficient delivery of goods. For example, consider converting taxi ranks and bus stops into loading bays during defined hours on certain routes; and allowing goods-carrying HGVs use Bus Lanes during certain hours on certain routes.
8.3	Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?	<ul style="list-style-type: none"> Routes from ports to major counties in Ireland with adequate hubs at each end to allow easy movement of unloading/loading with local storage/distribution centres at reasonable rates. Introduce a commercial goods Luas to move product into the city centre.
8.4	What are the barriers which prevent movement of freight by rail?	<ul style="list-style-type: none"> Limited rail network, time for loading/unloading not feasible for all freight As an alternative, the road network allows for reasonable driving times to most locations, making rail a less attractive option
8.5	What further action is needed to improve the hinterland connectivity of Ireland's ports and airports, particularly in light of Brexit?	<ul style="list-style-type: none"> Improved facilities for parking, queueing and for drivers at port locations Expand the existing motorway road network to better service the regional towns and assist in the movement of goods from ports around the country.

A photograph of two students in white lab coats looking at a microscope in a laboratory setting. Other students are visible in the background.

Mayo, Sligo and Leitrim Education & Training Board

Opportunities for Life and Living



msletb

Bord Oideachais agus Oiliúna
Mhaigh Eo, Shligigh agus Liatroma
*Mayo, Sligo and Leitrim
Education and Training Board*

MSLETB Submission:

10 Year Strategy
For the
Transport and Logistics
Sector

14 July 2021

1. Introduction

This submission has been prepared in response to an open call from The Department of Transport to participate in a public consultation to seek views towards the development of a strategy for the haulage sector. Views or submissions were 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 public.

Mayo, Sligo and Leitrim Education and Training Board (MSLETB) is a leading provider of Further Education and Training (FET) delivering programmes and a wide range of educational services to around 20,000 students and learners on an annually basis across the counties of Mayo, Sligo and Leitrim and nationally through our apprenticeship programmes.

MSLETB's educational and training provision includes second-level schools, further education colleges and a range of adult and further education centres delivering education and training programmes, Post Leaving Certificate Courses (PLCs), Youthreach centres, Outdoor Education, Youth Services, Music Generation, Apprenticeships and Traineeships.

MSLETB provides employment and enterprise support focused services through the provision of training for the unemployed and training to support enterprises and business through the provision of training for people in employment.

MSLETB will be working with our colleagues in the Department of Social Protection to deliver training in support of the 'Pathways to Work 2021-2025 strategy' aimed at getting 75,000 long-term unemployed people back to work and cutting youth unemployment. This is particularly pertinent to our submission given the acute shortage of labour in the HGV sector.

The availability of well-paid jobs in a sector at a time of high unemployment, particularly youth unemployment, is a conundrum. Training interventions included in the 10-year strategy for the Transport and Logistics sector could be part of the solution to resolve these issues.

MSLETB welcomes the opportunity to contribute to the consultation process especially in areas of particular relevance to Further Education and Training.

- Labour Market and Skills Training
- Sector Support particularly around the Challenges faced due to Brexit & C19
- Environment Decarbonisation and Road Safety

2. Labour Market & Skills Training

The FET sector can train and encourage more young people to choose a career in the Haulage Sector (With the assistance and collaboration of other stakeholders).

There are significant shortages of trained professional drivers in Ireland, and across Europe, and the age profile of those in the sector is very high. At the same time, we have record numbers of young people who are unemployed or who are in precarious employment. The 'Pathways to Work 2021-2025 strategy' aimed at getting 75,000 long-term unemployed people back to work and cutting youth unemployment could facilitate action to address this skills shortage. The basic raw material to address skills shortages in the haulage sector are young people with a driving licence who can progress onto professional driver training.

The average national pass rate for the driving tests for 2018 - 2020 was just over 50%.

One of the major barriers facing many unemployed young people is the lack of a driving licence. They are excluded from some job opportunities or the potential to train for professional driving qualifications because they do not have a basic car licence. They cannot get a licence because they are unemployed and cannot afford the costs associated with learning to drive or do they not have access to a privately owned vehicle.

To commence on a journey to becoming a professional driver in the Haulage, or many other sectors, young people must first learn to drive. The long waiting time for the driving test and the high failure rate, contribute to the difficulties and delays young people experience when setting out to become a professional driver. This can be addressed through formal programmes of training, providing free training for the unemployed as part of the 'Skills to Compete' initiative (Skills training provided by ETBs in response to the unemployment crisis looming because of C19). Formal training could lead to higher pass rates thereby accelerating the pipeline of trainees into professional driver training.

The sector is male dominated, training methodologies and measures could be introduced to address this gender imbalance leading to greater participation by females and increasing the talent pool available to take up HGV and other professional driving positions. If more females were introduced to formal driving training at an earlier age, through the proposed traineeship, this might encourage them to progress to professional driving programmes.

Another major problem for employers dealing with the shortages of trained professional drivers and the addressing the age profile of those in the sector is the unwillingness of the insurance sector to provide cover for younger drivers (18 – 25 year olds).

Insurance Companies might look more favourably on the younger cohort 18 – 25 year olds gaining employment in the HGV sector if they have undergone a recognised certified formal driving programme from basic driving, through advanced driving, then professional driving (HGV) and culminating in the SMART Driving Programme.

Support, actions to address the skills shortage & gender imbalance challenges

ETBs should provide Formalised Driver Training connected to testing (In collaboration with the RSA) for better outcomes and ultimately provide a pipeline of new entrants for the Transport and Logistics Sector

Develop a 'Driver Traineeship' as part of the 'Skills to Compete' initiative and 'Pathways to Work strategy' to target young unemployed people. Incorporating modules on:

- Theory & immersive practice to prepare candidates for the driving test. Training will include the necessary mandatory training. For car tests, completion of at least 12 Essential Driver Training (EDT) sessions with an RSA Approved Driving Instructor (ADI)
- Additional modules on Vehicle Safety, maintenance Safe Driving, Rules of the Road, etc.
- Advanced/Defensive driver training (Motorway, Night Driving, Dealing with emergencies etc.
- Testing must be synchronised/coordinated/connected to training with the RSA.
- Collaboration will be required between the RSA & ETBs to monitor outcomes Formalised/Structured programmes will increase pass rates.
- Successful graduates will be 'streamed' onto professional driving courses & traineeships: HGV, Van and Coach/Bus.
- All participants on these programmes should be required to complete the QQI LEVEL 5 Special Purpose Award: Certificate in Digital Assisted Eco Driving (HGV), the only nationally accredited course that promotes safe environmental driving and incorporates digital skills. See smartdriving.ie for more information.

Promotion of greater gender balance in the sector.

The introduction of an employment focused Driver Traineeship through 'Skills to Compete' and 'Pathways to Work strategy' for young unemployed people targets males & females.

Once participating in an organised training programme, that allows candidates to opt for progression routes in to professional driving programmes (HGV, Bus/Coach and Van driving etc), it is more likely that the young person, males or female, will progress through the programme and obtain the qualification and work in the relevant sector.

Learners that do not progress will have a valid driving licence and advanced driver training which will make them more mobile and employable. Either way taking a formal training approach to driver training of all types will promote greater gender balance in the transport & logistics sectors.

Recommendation

Formalised Training Programmes from basic driver training through professional programmes delivered by the FET Sector with a collaborative approach with all stakeholders should be supported in the 10 Year Haulage Strategy as a methodology to tackle the skills shortages, promote gender balance and promote safer driving.

3. FET Sector Support

COVID 19

The Heavy Freight Sector (HFS) in Ireland proved to be an essential service during the C19 crisis, particularly during periods of significant societal lock downs, when food, medicines and goods needed to be transported domestically and internationally for the health and wellbeing of the population and for the economic health of the country.

As with most key workers who worked through the C19 pandemic, workers in the haulage sector experienced barriers, inconvenience, new practices and restrictions, all of which increased their workloads: - For example, the testing regime necessary to enter France required pre-boarding C19 tests/checks at Irish ports resulting in increased travel time. There were also significant delays traversing return trips from Europe. The C19 crisis accelerated the use of digital devices and the digitisation of documentation that has raised challenges for many in the sector. Undoubtedly, employees will have experienced negative effects on their mental & physical health and wellbeing resulting from these challenges.

Heretofore, training for the sector in MSLETB and other ETBs focused on preparing new entrants to gain licences for HGV Rigid and Artic driving and other technical skills for warehouse operations such as RTITB Forklift Counterbalance, RTITB Forklift Reach Certificate, ADR, - Hazard Chemical Training.

Recently MSLETB & WWETB developed a programme entitled the 'SMART' Driving programme that leads to a QQI LEVEL 5 Special Purpose Award: Certificate in Digital Assisted Eco Driving (HGV). See Attached 'SMART' driving programme). The programme supports driving styles and behaviours that mitigate against driver 'stress', promotes safer driving and provides digital training (use of hand held devices and 'in-cab' technologies).

FET sector support and actions to address the challenges experienced due to C19

Employee Health & Welfare, Infection Prevention & Control, IPC, (Non Health Care version developed by MSLETB), First Aid Response as well as the QQI LEVEL 5 Special Purpose Award: Certificate in Digital Assisted Eco Driving (SMART Driving), which includes digital skills training, should be integrated into the HGV Traineeship and HGV driving courses for all new entrants to the HGV sector.

The SMART Driving Programme and the IPC programme as well as a myriad of other short courses including H&S, wellbeing, and digital skills are available 'free of charge' to qualifying existing HGV drivers and employers in the sector under the SOLAS 'Skills to Advance' initiative. These should be promoted by all stakeholders and delivered throughout the FET sector

Such training initiatives will give employers, employees and new entrants in the sector a greater awareness of safety and infection control that will reduce stress and build resilience helping to increase employer and employee confidence in their ability to cope effectively with everyday challenges, including C19, faced in the Haulage Sector.

Brexit

The Haulage sector is facing many economic vulnerabilities giving rise to the need for improved productivity. These include significant challenges due to BREXIT; which has resulted in border controls (causing delays and resultant increased fuel usage), increased competition from EU hauliers, (using direct ferries to avoid UK/EU customs controls) and the ability of Irish Hauliers to engage in cabotage operations.

Identified Challenges

- Fuel costs increase due to extended supply lines and costlier routes. Increased fuel costs due to 'Idling' for example as a result of stops/queues/delays at customs/ports
- Increased human resource costs; - tachograph implications, drivers spend more time in ports on ferries etc. Back office support required for additional customs documentation and administration. Additional costs for labelling and packaging
- Increased digitisation of process and procedures requiring upskilling of existing workforce particularly HGV Drivers
- Perishables susceptible to loss during delayed transit, higher refrigeration and storage costs.
- Potential of competition from EU hauliers and loss of cabotage operations

Strategies for the Haulage Sector (FET Sector response)

- All HGV drivers (current and new entrants) should undergo the SMART Driving programme that can significantly increase productivity through fuel savings.
- Digital Training for HGV drivers to enable them to build their digital resilience and deal with the increased levels of digitisation resulting from Brexit/Customs challenges
- Training for HGV drivers on Customs formalities/processes/documentation

Recommendation

The 10 Year Strategy must formally recognise the contribution that the FET sector can make to the Transport and Logistics sector, particularly during challenging times. The Strategy must make reference to the existing resources and training available to employers and existing employees through initiatives such as the SOLAS funded 'Skills to Advance' initiative and the training available for new entrants. The Strategy must include the potential of future collaborations through which FET sector can engage with employers to develop Apprenticeships, Traineeships and sector specific programmes, particularly around digital skills, Health, Safety & Wellbeing, Environmental and Safe driving behaviours and practices.

4. Environment Decarbonisation and Road Safety

Environment/ Decarbonisation

One way that the Haulage sector could promote better environmental practices in the industry is to upgrade the National fleet. This would result in an immediate reduction in emissions and act as a means to get the enhanced safety features of newer vehicles onto our roads for the benefit of all. This would be most beneficial and impactful if all HGV drivers undergo training that reflects the modern vehicle and the technology available. All drivers, existing and new entrants to the sector, should be trained and fully informed of the digital capabilities and technologies available in the modern vehicle that can help to make their job safer and less stressful whilst reducing emissions, providing for more economical driving, and reducing risks to other road users.

The 'SMART' driving programme leads to a Level 5 Special Purpose Award: Certificate in Digital Assisted Eco Driving, (HGV). Developed by MSLETB, in collaboration with the Irish Road Haulage Association and WWETB, provides training that introduces drivers and employers to new and emerging technologies, including digitally assisted driving and 'In Cab' technologies, and aims to change driving behaviours that will reduce fuel and therefore reduce emissions. There would also be commensurate improvements in terms of local air quality in the form of reduced micro-particles and nitrogen oxides.

The average distance travelled per fleet vehicle per year in Ireland = 99,526 km.

Potential Annual CO2 Emissions Reductions¹

- Per Fleet Vehicle from 10% fuel usage reduction = 10 tons
- Per 8 Vehicle fleet from 10% fuel usage reduction = 80 tons

This programme funded through the SOLAS innovation fund will be offered across the FET sector (free of charge subject to qualifying criteria) to increase awareness of environmental/ decarbonisation issues and promote more environmentally friendly practices and safer driving in the industry. See smartdriving.ie for more information

- **S**afe efficient driving – learn about Aerodynamics, Momentum, Speed control and collision avoidance measures.
- **M**aking business more economical and sustainable - find out how you can contribute to reduced operating costs.
- **A**re you ready for digitisation? – learn about the latest in digital skills for drivers
- **R**educing speed, fuel, and emissions – think lowered costs, safer, more efficient driving practices, and a greener environment!
- **T**echnologies & next generation vehicles – future proof and develop your career by learning about Telematics and the latest tech emissions standards.

¹ Source: Utilising haulage operator data for monitoring driver's mileage, fuel usage and CO2 emissions, February 2020.

Road Safety

Digital Assisted Eco Driving training improves road safety: Several reports cite the Eco-driving contribution to the health and safety culture within an organisation.² HGV Drivers can develop skills that promote their safety and that of their vehicle, load and other road users³. The eco-driving style (moderating speed, driving smoothly, better observation and anticipation of the situation ahead and traffic flow) is highly correlated with the driving style promoted to reduce accident risk.

There is UK evidence of road safety benefits arising from efficient driving (e.g. training for efficient driving for drivers reported to correlate with reductions in subsequent accidents rates of between 14% and 35%).⁴

All FET sector programme should incorporate more safety focused content

- All HGV Traineeships and driver training in Ireland should include the QQI LEVEL 5 Special Purpose Award: Certificate in Digital Assisted Eco Driving (HGV).
- All Driving course should have input/collaborate with other agencies involved in Road Safety: Road Safety Authority, Health & Safety Authority, An Garda Síochána etc.
- There must be an integrated approach to all driver training and testing. There is a disconnect now: - Training programmes ordinarily conclude with assessments to demonstrate skills and competencies. In the case of driving courses, it is impossible to synchronise / coordinate the test to coincide with the end of the training programme.
- ETBs could incorporate more content from other agencies and this should be optimised with specific test periods (ETBs could schedule programmes to align with RSA allocated test slots).
- Pass rates and safety standards would improve if all driver training were formalised/structured. Increasing pass rates would also reduce waiting lists (Numbers repeating two or more tests would reduce) It would also include safe/advanced driving training at an earlier stage.

Recommendation

The 10 Year Strategy should recommend the QQI LEVEL 5 Special Purpose Award: Certificate in Digital Assisted Eco Driving (HGV) – SMART Driving programme, delivered through the FET sector to all stakeholders in the Transport and Logistics sector as a model to introduce new technologies, reduce emissions and increase road safety. This training is available free of charge to all existing employees in the sector (subject to qualifying criteria). The eco-driving style (moderating speed, driving smoothly, better observation and anticipation of the situation ahead and traffic flow) is highly correlated a reduction in fuel and therefore emissions and is also a driving style that reduces accident risk. The QQI Qualification is on the national qualification framework. There must be an integrated approach to all driver training and testing with collaboration and synchronisation of driver testing.

² https://www.cieca.eu/sites/default/files/documents/projects_and_studies/ECOWILL_FINAL_REPORT.pdf

³ *Eco-driving for HGVs -Final Report*, UK Department Transport, December 2016. <https://www.fors-online.org.uk/cms/wp-content/uploads/2017/02/Eco-driving-for-HGVs.pdf>

⁴ *Efficient Driving- A rapid evidence assessment for the Department of Transport, UK, 2016.* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/509972/efficient-driving-rapid-evidence-assessment.pdf



Submission to Department of Transport

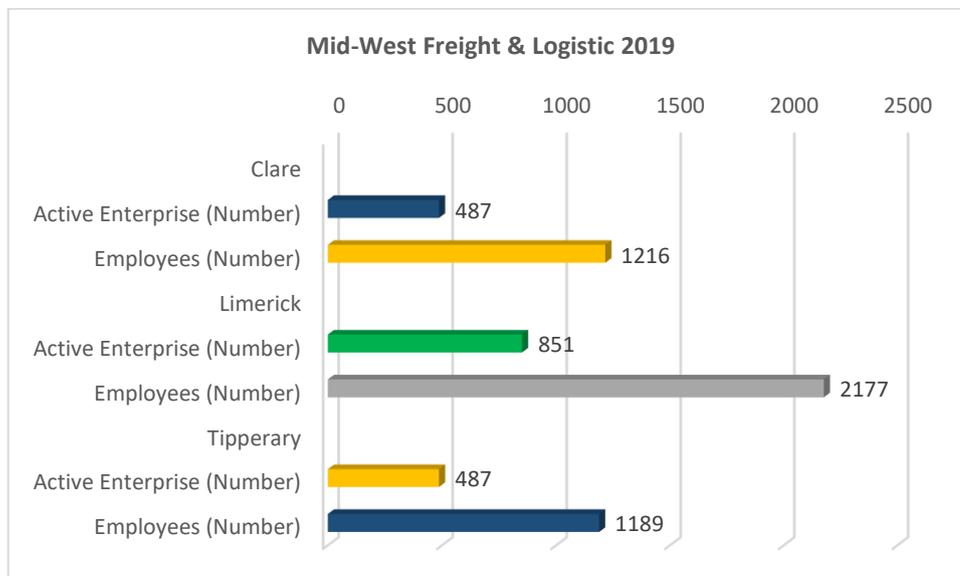
Public Consultation: 10 Year Strategy Haulage Sector

Freight & Logistics Mid-West Cluster

Mid-West Region

According to the CSO (2020, Q3) there are 7,100 employed across 1,800 enterprises within the broad logistics and transport sector covering road haulage, warehousing and supply chain in the region.

Cedefop which is the EU centre for the development of vocational training has identified logistics for significant employment growth up to 2030 in Ireland ahead of all other industry sectors as part of their skills forecasting research.



Freight & Logistics Network

To help the sector meet current and future skill needs the MWRSF established a regional network of employers in collaboration with education and training providers in 2019. There are currently 27 employers and the network meets approximately three times annually to discuss training needs, Government funding supports (Springboard, Skills to Advance, Skillnet) and new programme development.

Additional briefings are facilitated to inform members on other upskilling opportunities such as the Level 6 Associate Apprenticeship designed by FTA and the Supply Chain professional apprenticeships delivered by University of Limerick.

Developing greater cohesion between logistics employers and education & training providers is paramount to addressing current skill shortages in terms of both HGV mechanics and HGV drivers. This network also provides for upskilling of existing employees thus ensuring talent retention.

Employers in the region have identified the following actions and suggestions that may assist in addressing the current skill shortage and assist in creating new talent pipeline.

New Programme Development

In response to skill needs identified by the network several new programmes have or are currently being developed to help attract and retain talent within the sector.

- Certificate in Global Trade Compliance Level 6 & 7 University of Limerick
- Certificate in HGV Diagnostics Limerick Institute of Technology
- HGV Service Technician Traineeship Limerick Clare ETB (in development) with progression to Level 6 Transport Management programme in Limerick Institute of Technology.

Proposals in Building Talent Pipelines

- Career Guidance: In collaboration with LCETB the forum has facilitated employers to present career opportunities to school guidance counsellors and these events help to promote careers and identify future talent and learners especially for new Traineeships. These employer career briefings should be done and facilitated by all ETB's.
- DEASP: Data from the Intreo on claimants who have expressed an interest in specific industries such as HGV driving can enable targeted communication on career pathways with employers subject to appropriate training being completed.
- Greater alignment on ETB training provision especially where there are two or more ETB's in the same region. The professional HGV Traineeship designed by Waterford Wexford ETB should be delivered across all ETB's where employers are willing to engage. It is difficult explaining to some employers as to why their local ETB will not deliver a programme that has proven successful in other regions in delivering new HGV talent.
- Career Progression Options: One of the challenges in recruiting new HGV drivers is the prospect of drivers spending possibly 30 years plus behind the wheel. If the industry could demonstrate pathways to alternative roles after specific time periods such as Supply Chain, Route Planning, Warehouse Operations, Stock Control etc with associated training supports this may help improve attractiveness in sourcing new drivers.

- Upskilling pathways from further to higher education, many drivers or new entrants have either primary or post primary education. There are no clear upskilling programmes available that enable learners upskill at Levels 4, 5 and progress in similar area such as Supply Chain, Lean, Logistics Management to Levels 6 or higher.
- Eco Driving, a marketing campaign that can build on the role of how new technologies such as new electric and hybrid vehicles that are contributing towards greater sustainability may help in attracting young drivers.
- Career Promotions, to include events such as 'a day in the life' employer facilitated tours of their facilities showcasing scale and breadth of logistics which may assist in capturing interest amongst younger generation.
- Quantify through driver license data the numbers of qualified drivers currently not working in the sector and provide incentives to re-enter the profession.

Associated issues such as insurance, licensing protocols, employment permits etc have been comprehensively highlighted by industry representative associations.

Joe Leddin

Manager MWRSF



10th June 2021

Minister of State Mr Robert Troy TD
Department of Enterprise, Trade and Employment
23 Kildare Street
Dublin 2
D02 TD30

Reference – Transport Skills Deficit & Climate Change

CC Tánaiste Mr Leo Varadkar TD
CC Minister Damien English TD
CC Mr John Nolan

Hello Minister Troy

Further to our recent conversation and the VCC I was invited onto last week by the British Irish Chamber of Commerce and the Family Business Network. On that call I had the opportunity to converse with the Minister for Finance Mr Pascal Donohoe TD. He was excellent and as I could only ask one question during that particular event, I am using this correspondence to outline the immediate challenges we are facing as an industry.

1. Skills Shortage

International HGV drivers need to be on the Skills Shortage List in a big way – currently we have 50 trucks with no drivers. Ireland cannot compete with emerging mainland European countries, where drivers can get full time work and can visit their families far more often without the need to travel by plane or ferry. In an era, post Covid this is more and more important. Ireland relies heavily on exporting and as a result of this is losing its competitiveness. This will impact job creation and Foreign Direct Investment.

We need to recruit outside of the EU and quickly in countries such as Ukraine, the Philippines, India and Brazil. (Be aware that Eastern European Trucking companies are now getting permits for drivers from the Philippines so Eastern Europe as a source has strongly diminished). Even though the HGV drivers outside of the EU drive the trucks from the same manufacturer in Germany, and in the case of India actually drive on the same side of the road, we don't currently recognise their HGV licence.

A government treaty or a simple conversion course of drivers licences from drivers outside the EU is needed.

HGV mechanics also need to be on the skills shortage list as they are currently not on it. Without them we have a serious safety issue. We cannot source HGV mechanics in Ireland - even so we cannot get them work permits to come here even though we pay very well - as they are not on a shortage list.

This is adding huge cost and uncertainty to our Exports. We need this solution and fast. At a time when Ireland can grow its export sales across Europe post Brexit, the transport industry is hampered because we simply cannot source drivers or mechanics.

At the time of writing this, the UK situation is much worse and you need to watch this space.

We have operations there that are in dire trouble due to a lack of skilled labour.

See below link from the UK press. Expect this to get worse over the summer and into the winter months.

<https://www.dailymail.co.uk/news/article-9667501/Fresh-food-rotting-cold-stores-Brexit-HGV-driver-shortage.html>

2. Fleet Renewal post Covid and in line with Climate Change Requirements

Capital allowances are currently in the UK of 25% post Covid - this can be used for fleet renewal. A scrappage scheme is also being considered to accelerate the use of Euro 6 trucks & then Euro 7 as they do not omit NOx or SOx. We have no other viable alternative as Gas, Electric cannot do the job. Hydrogen hasn't worked as yet but may do so in the next 10-20 years. Let's watch this space.

Currently in Ireland we have no Incentives for same – Why?

If we went with above, the whole National Fleet could be renewed within a very short period with all of the spending and relevant taxes crystalising in Ireland instead of the UK.

3. European Essential User Fuel Rebate

The essential user fuel rebate mechanism is an EU way of allowing for cost differences and fair competition across the EU and especially to countries on the periphery. It works very well in countries such as France and Belgium for the Transport, Agriculture and Fishing Industries. Government's can raise funds, change persons habits and actions, without losing industry competitiveness.

Ireland's fuel rebate mechanism needs to be recalibrated to be an Essential User Fuel Rebate Mechanism, to the same levels of our European neighbours in Belgium and France, so it can do the same job as it does in those countries.

We absolutely need a level playing field to have a competitive and functioning Transport Industry. If not, the added costs simply go onto our exports and imports making them uncompetitive for an Island Nation which is already on the periphery of the EU.

These three items are the most pressing in our industry as they deal with a major skills deficit, positive climate change action in our industry that actually works and also deals with competitiveness whilst being aware of the governments needs to raise funds.

I cannot emphasise the importance on the skills shortage as even if all of the other components are there - if there is no International HGV driver nothing happens!!!

If ever this industry has shown what it can, and did do, it was during Covid and Brexit which crossed over at the same time. At none of those times did we have empty trucks which we do have now. We really need action asap.

Our engagement with the Minister for Finance Pascal Donohoe was smart and I felt we were aligned. Whilst he could not promise anything, he did get it. We need to do the same for skills and quickly. I look forward to engaging with yourself, Minister English and Tánaiste Mr Leo Varadkar on this matter.

Regards

Yours sincerely



Richard Nolan
CEO

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Road Transport Freight Policy Division
Department of Transport,
Leeson Lane, Dublin 2

14th July 2021

Re: Ten-year Strategy for the Haulage Sector

To whom it may concern,

Polar Ice Ltd welcomes the publication of the Ten-year Strategy for the Haulage Sector First Consultation Document and we appreciate the opportunity to submit our views for consideration. Polar Ice Ltd are own account operators and we have a fleet of ten vehicles ranging from LGV's, HGV's & company cars.

Polar Ice manufactures a product called Dry Ice and operates its own transport fleet of HGV and LGV vehicles for bulk dry ice deliveries. This gives us full control over time-sensitive deliveries which can be of a critical nature, for Ireland's food, medical and pharmaceutical sectors. Our just-in-time delivery service guarantees excellent service levels for our customers and gives us the flexibility to act promptly on emergency requirements.

We are accredited to the FTA TruckSafe Green Gold Standard, along with ISO 9001 and BRC. All of these standards are globally recognised, and it gives us great pride as an SME to be able to operate to these levels. We strive for excellence across all areas of the business, and by treating our fleet as a critical asset rather than a cost to be managed, we provide exceptional service to our customers.

We have aligned our transport operations to the FTA Ireland TruckSafe standard since 2019 and achieving the Gold Standard gives us and our customers the assurance of knowing that we operate to the highest standards of compliance. It is our ambition to make Polar Ice Ltd a sustainable, carbon neutral, supplier of dry ice products in Ireland, and meeting the new TruckSafe Green Standard is a key step in this journey. It provides independent verification that we have systems in place to reduce the environmental impact of our transport operations, such as carbon reduction policies, fuel saving measures, and are making efforts to transition to alternative fuels.

We have identified the sections contained in the 10-year strategy in the following order of preference.

- Road Safety
- Labour markets/Skills
- Environmental/Decarbonisation
- Road Infrastructure
- Covid-19
- Brexit
- Mobility package
- Intermodal Transport

2. COVID-19 & BREXIT

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 Irelands supply chains?

- Education and training can continue via zoom – CPC should be considered for zoom. Theory Test, apprenticeships etc. This might help with the skilled workers shortages in the industry.
- Less time can be lost with transitioning to working from home and the clerical departments may be able to work remote so the licence departments do not loose so much down time that creates back logs.
- Better communication between the stakeholders.

What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?

- Freight distribution and supply chain must be afforded greater recognition within Government.
- EU Commission should consider facilitating holders of an Irish issued Transport Manager CPC qualification, working in Ireland but living in Northern Ireland, to act as the nominated Transport Manager for an Irish (EU) registered haulier.

How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?

- A specialised committee for transport will consider over time the practicalities and realities of trading between the two blocks.
- The political will on both sides needs to be evident to assist with the delivery of more efficient trade flows between the two blocks.

3. Making Road Freight Transport Cleaner

What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

Multifuel Safety Framework should be considered to provide guidance and information as to the viability and availability of alternative fuels. In addition, impartial analysis of available technologies should be provided to assist operators understand what alternative technologies are available and suitable for their needs.

Because of the variety of type of commercial fleets, the weights carried and the size of vehicle, distances travelled, urban versus motorway driving, national versus international driving, consideration must be given to understanding the cost with transitioning to newer fuelling technologies, the availability of the technologies, the cost of the new technologies, the lifespan of the new technologies and most importantly the infrastructure available to support the effective transition to newer fuelling technologies. It is reasonable to associated assume that for new technologies to be introduced they must make business sense, be sustainable (in the sense that they are not short-term solutions) and most importantly affordable. The average age of a commercial vehicle in Europe is 11.6 years for LGVs, HGVs 13 years and buses 11.7 years¹.

Whilst we recognise and support the move to new fuelling technologies that deliver improved air quality and reduced greenhouse gas emissions, it is important to note that the points outlined do not divert from our position that those that continue to operate Diesel commercial vehicles must be supported to ensure they do not face an

¹

unfair competitive environment. This could occur due to the increased cost of diesel and the Government policy to increase carbon tax substantially over the coming years. The fact remains that the commercial HGV fleet will not be able to transition to alternative fuelled vehicles en-masse in a short period of time because the rolling stock of alternative fuelled vehicles is not available, and the refuelling sites do not have the infrastructure necessary to support the transition.

- Education of haulage businesses / supply chain operations in central to success.
- To encourage investment in what are currently more expensive alternatives to diesel the refuelling infrastructure must be available to support the transition.
- Realistic transition deadlines must take account of lack of viable alternatives, production and availability of alternative fuelling technology, the cost of the infrastructure and the global availability of the technologies.
- Government and GNI grants to support transition needs to be maintained for the next few years to encourage a large sector take up which will support the business case for further fuelling forecourts, charging points etc. The larger the volume of vehicles on the road the further the business case goes on infrastructure etc.
- Diesel is the workhorse fuel for vehicles over 3.5t. Whilst there are a number of options available to improve emissions including Euro VI engines there is no one easily identifiable short to medium term solution for transition. This is due to a number of factors including, use of vehicles, where there are constraints for international hauliers because of limitations on acceptability of Liquefied Natural Gas (LNG)/CNG on ferries and the Channel Tunnel. Cost of the technologies is prohibitive compared to the diesel equivalent.
- FTAI's TruckSafe™ Green Standard that requires an annual audit of Eco-driver training, improved vehicle efficiencies and integration of alternative technologies into the fleet, should be recognised as developing a culture of compliance and management of fuel.
- There is a need to support pilot projects addressing alternative fuels.
- Further toll charge reduction incentives should be forthcoming as an incentive to transition as soon as possible to alternative fuels.

What is needed to incentivise less polluting Light Commercial Vehicles?

- Further toll charge reductions should be provided as an incentive to transition to an electric LCV.
- Funding needs to be provided to suppliers of chargers and alternative fuel facilities to ensure a well-maintained infrastructure.
- With a high proportion of LCVs taken home by drivers after their days work, home chargers should be included for funding those operating company electric vehicles.
- Grants should be available for commercial chargers for leased vans and not limited to owned vehicles.
- The Price of alternatives need to be comparable to diesel.
- Infrastructural development is essential to increase the availability and accessibility of places to fuel/recharge.
- Commercial SEAI grants for LCVs should at the very least match private vehicle grants.
- Clarity should be provided on how the electricity that is used to recharge vehicles is produced (e.g., how much through wind energy)
- At the point of purchase, more details and guidance should be provided on how and where batteries are sourced, how they are manufactured and disposed of, including the cost of disposal. Clear guidelines including cradle to grave lifespan of the battery should be provided to create more trust and confidence that the technology is truly better for the environment.

Should eco-driver training be rolled out further, for example, as part of Driver CPC training?

- Yes we feel eco-driver training should be rolled out as part of the driver CPC training and also find a way to roll it out other van drivers who drive for work that do not complete the Driver CPC training. Eco-driver training in our company has played a critical factor in reducing Co2 emissions, improving our driver's mpg and it reduced our fuel costs.

Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

- Unsure.

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.

To ensure a vibrant and competitive marketplace it is very important that the increase in carbon tax and the cost of diesel does not compromise SMEs and those operating diesel-powered business who have no alternatives due to prohibitive costs of the new technology, the lack of availability of the technology or where the infrastructure has not been developed to support the new fuelling technologies.

- Barrier free tolling
- Improving performance of existing vehicles and supply chains
- Confirm lowest rate of tax will be for Euro VI / 6d where Adblue is being used and not by-passed.
- Incentivise Euro VI and CNG vehicles with reduced road tolls and clarity (Euro VI) on LEZs – HGVs bought today will be on fleet for next 4-5 years and on-road for 10-12 years.
- Develop clear safety guidelines to support the transition to alternative fuelling technologies.
- Develop education and training modules within all training and education programmes for the transport and logistics sector as well as for trade apprenticeship such as mechanical engineer.
- Support initiatives like FTAI's TruckSafe™ and TruckSafe™ Green Standard / VanSafe™ by reference them as examples that deliver in terms of better fuel efficiency, improved environmental performance particularly the TruckSafe Green Standard
- Good Traffic Management plans to reduce traffic congestion will improve air quality particularly on the M50

4. Making Road Freight Transport Safer

What are the road safety priorities in road haulage for the next 10 years?

Training – safe and eco-driver training, load security and tachograph training.
Promotion of good mental health and well-being for the lone workers. Healthy eating and the importance of good practices to reduce driver fatigue

How are these priorities best addressed?

Driver CPC modules to be utilised more with experts in the field. Bring in a tacograph to the CPC for demonstration. Bring in a nutritionist, bring in a well-being specialist into the classroom or on line, if CPC's move to zoom.

What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?

- RSA to appoint a member of staff with the sole responsibility for liaison with the freight distribution and haulage sector.
- The CVORI needs to be re-invigorated.

What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?

- Road traffic, and other legislation relevant to the haulage sector, is extremely difficult to follow because of its complexity and the fact that it is fragmented because of numerous amendments.
 - The legislation should be consolidated with a view to ensuring:
 - It is relevant for the times we live in.
 - The language used is more easily understood.
 - It is segmented in a structured and organised manner making it easier to follow.
 - Legal obligations are easily identifiable and the legal consequences for non-compliance are clearly set out.
- The RSA, HSA and other stakeholders should work collaboratively with the haulage sector to provide sector specific road safety education campaigns covering such topics as:
 - Speed compliance, intoxicated driving, distracted driving, fatigue and taking of rest periods, safety at service stations, medical fitness to drive and the importance of healthy eating habits, safe and secure loading.

Do you have any other comments on road safety matters?

- More safe and secure rest areas on national routes.

5. EU Road Transport Policy

What are your views on how Ireland implements the Mobility Package changes?

- Authorities responsible for regulation and enforcement must provide regular updates to industry on the new requirements to ensure all have the ability and means to be compliant.

6. ROAD INFRASTRUCTURE

Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?

Facilities must include the following and have more available nationally:

- Areas for commercial vehicles to park safely and securely, allowing drivers take their mandatory break and rest periods (including overnight parking).
- Refuelling facilities catering for all fuel types and electric charging.
- Suitable toilet and shower facilities.
- Comfortable social rest areas.
- Availability of healthy food options.

What more is needed in relation to road user charging for freight transport in Ireland?

- Clear guidelines need to be developed advising industry of the plans for future road user charging for freight transport.
- The change in the emphasis on road user charging at EU level
- A common approach to road charging to provide a benefit to the industry overall, against the increase in costs as a result of charging and tolling.
- Advances in engine technology, led by changes to HGV engines reducing particulates and the better performance of Euro 6 on NOx should result in reduced road charging rates. Users of Alternative fuels (to petrol/Diesel) should benefit from reduced road charging rates. This could form the basis of additional incentives to encourage operators to move to cleaner fuelling technologies sooner.
- The current reduction in Toll rates for users of 'Alternative Fuels' should continue.

7. LABOUR MARKET SKILLS

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.

- Employers must promote their businesses in a more positive manner.
- Link qualifications on the National Framework of Qualifications (NFQ) with the profession of professional driving -
 - Support the establishment and delivery of the Level 6 Transport Operations and Commercial Driver Apprenticeship
 - Clearly identify all education and training programmes for the haulage sector.
 - Continue to develop ties between academia and industry.
- Employers must ensure that they have competitive terms and conditions for drivers and other roles that support loyalty within the workforce. Polar Ice organise our drivers CPC, pay for the cost and also pay the drivers to do the training. This is very much appreciated by the drivers, it just a small gesture but it means a lot to them.
- Driver Apprenticeship to be considered as a pre-requisite necessary to support effective succession planning in family business.

How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?

- The haulage sector must start promoting their own profession.
- There should be a focus on the aesthetics of the profession of driving. How drivers are presented, do they have uniforms, is personal hygiene of importance to the employer, what PPE is provided to drivers, and is it maintained to a high level.
- Drivers have a significant customer care role. They are the face of the business. how they present themselves and interact with customers and the public is hugely important in defining the perception of the industry.
- All within the supply chain need to be educated and understand the role of a professional driver. Mapping out the day-to-day role of a driver, through case studies, and presentations by drivers is important in creating awareness of how varied, difficult and rewarding the job is at the same time as developing respect for the position.
- Employers and stakeholders need to improve their communication with drivers to ensure that they understand if there will be delays, why this is the case. When there are gaps in the communication process it creates frustration for drivers who are obliged to work within the working time directive and tachograph regulations.
 - Education of those charged with goods reception in terms of how to interact with drivers needs to be promoted and supported by a form of driver charter – get respect, give respect – standardise demurrage charges etc.
- The freight distribution and logistics sector (including the haulage sector) must become more active in encouraging and promoting gender diversity within the industry.

How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?

Developing a consistent and sustainable outreach to secondary schools and further education providers is important in highlighting the diversity of roles and opportunities that exist in the freight distribution and logistics sector including the haulage sector. Developing a strategy to create awareness within schools through transition year initiatives is one example that can deliver interest in the sector. Working collaboratively through stakeholder committees is also essential in creating a common approach to developing awareness of the sector. This has started in 2018 through the addressing the future needs report and is continuing through the Logistics and Supply Chain Skills Group.

8.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?

Consideration must be afforded to the following:

- Delivery of a more effective and efficient transport infrastructure.
- Supporting efficient logistics through the planning system - Freight movements are actively discouraged by the planning system from delivery bays to cargo bikes, to the circumference of turns at junctions.
- As part of an integrated transport system, defining and supporting the use of Ultra Low Emission HGVs and give increased access to Low Emission commercial vehicles in urban areas.
- Incentivising integrated freight transport through grants and tax inducements.
- Ensure the power infrastructure required for zero emission vehicles is delivered.
- Carefully considering proposals for HGV restrictions due to the negative impacts of down-sizing.

- Ensuring the power infrastructure required for zero emission vehicles is delivered.
- Supporting vehicle manufacturers in the development and deployment of zero emission vehicles.

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?

Consideration should be given to the following:

- Permit and incentivise night deliveries by alternative fuelled vehicles including electric/CNG/LNG/Hydrogen vehicles, or EURO VI.
- Euro VI should be the minimum criteria for urban deliveries inside the M50 and similar ring roads around cities.
- Retailers should facilitate off-peak distribution, thus alleviating traffic congestion and leading to safer distribution.
- More consideration and space need to be provided for on-street deliveries. Planning must take account of the space needed for safe and efficient deliveries. The size of the vehicles required to service commercial buildings must be considered. This will reduce traffic congestion, improve safety, and reduce the levels of conflict between vulnerable road users and professional delivery personnel.

Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?

Moving freight quickly out of ports into inland consolidation/distribution centres will improve efficiencies for distribution, reduce traffic congestion and improve air quality.

What are the barriers which prevent movement of freight by rail?

- Recent studies suggest there may be savings in moving part or full consignments by rail. Grants should be considered by Government to help offset the initial and subsequent costs of moving to non-road modes of transport.
- The advantage of transporting goods by road is that the haulier has greater control over the departure time and can calculate delivery times with a certain degree of accuracy. Timely deliveries of goods by rail will be impacted by the rail schedule, and the quality and reliability of the rail network.

What further action is needed to improve the hinterland connectivity of Ireland's ports and airports, particularly in light of Brexit?

As an island nation we are reliant on our ports for our global connectivity. Air cargo, and particularly night flying, has numerous benefits including:

- Enables trading relationships.
- Makes Ireland a more attractive place to do business.
- Supports advanced logistics and supply chain functions.
- Enhances the ability of Irish based companies in providing the highest levels of customer care and after sales service.
- Increases consumer choice.

10-year Strategy for the Haulage Sector – 1st Consultation Document

Road Safety Authority's Response

16 July 2021





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Glossary of Terms

CNG	Compressed Natural Gas
EV	Electric vehicles
HRS	Hydrogen recharging stations
ICE	Internal combustion engine



Executive Summary

This Executive Summary summarises key recommendations contained in the Road Safety Authority response to the questions posed in the Department of Transport Consultation concerning a Ten-year Strategy for the Haulage Sector First Consultation Document.

The RSA reviewed each of the consultation questions through the lens of road safety as well as identifying potential opportunities to improve road safety, compliance, enforcement and stakeholder engagement recognising the many challenges facing the haulage sector over the next 10 years. Each of the questions in the consultation and the RSA responses has been numbered to facilitate referencing. Where a question is not being responded to by RSA, this means that the RSA is not making a submission in respect of a particular question.

The priority for the Road Safety Authority is to maximise the safety of all road users and to have a road safety regime in place which ensures that all vehicles used on Irish roads are of the highest standard and are fit for purpose and used safely.

The focus of the Department’s consultation document is on achieving ambitious climate action targets in the area of road freight transport emissions. The Road Safety Authority puts forward proposals to achieve this objective such as fleet turnover incentives, better vehicle maintenance, optimised freight movements and safer driving practices which can contribute significantly to cleaner, more environmentally conscious freight movement in Ireland. Road freight transport will present significant challenges in terms of reduction of green-house gases because of the heavy dependence by the sector on diesel fuel, forecasted growth in the demand for road freight services and fragmented supply chain practices. Furthermore, significant behavioural and operational changes may be required by parties in supply chains as well as by the public. The public appetite to accommodate these changes will be a significant factor in determining the success or otherwise of these changes.

Individual sections of the RSA response deal with the head-line topics identified in the Department’s consultation document. In responding the consultation, each section sets out the RSA experience in respect of the application of enforcement, dealing with Brexit and the pandemic as well as other matters. Individual recommendations are made. These recommendations are:

1. COVID-19
1.1 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?
<p>RSA recommendations:</p> <ul style="list-style-type: none"> I. Contingency plans must be put in place to cater for future pandemics including other events likely to significantly disrupt the HGV sector and supply chains II. National responses to pandemics must ensure that the road haulage industry including essential support services such as CVRT testing, repair garages, enforcement are available to the industry to support service provision. III. Vaccinations and personal protection equipment for HGV drivers must be prioritised in future pandemics



- IV. HGV drivers must have access to suitably equipped facilities at locations including sanitation, food as well as park-up facilities; and
- V. A coordinated and EU wide approach be implemented in respect of derogations from driving and resting time rules, extensions to driver licences, Driver CPC certs etc should be explored.

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

RSA recommendations:

- I. Criterion for the granting of national derogations from the EU driving and resting time rules should be prepared and published taking into account EU Commission guidance.
- II. The RSA and Garda Síochána should ensure a level of commercial vehicle enforcement during future pandemics/lockdowns, keeping road safety including commercial vehicle enforcement, as visible as possible while recognising resource availability and health and safety measures.
- III. A harmonised and coordinated contingency plan to facilitate the continued operation of road transport provision in future pandemics across the EU should be explored.

2. Brexit

2.1 What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?

RSA recommendations:

- I. Procedures relating to Customs checks and other controls should be streamlined to the greatest extent possible in order to minimize delays at border crossing points so that operator and driver compliance with the EU driving and resting time rules is assured.
- II. Network management must be optimized to alleviate concerns about HGV vehicle congestion to and from and within Dublin Port which should include space to accommodate drivers required to take breaks and rest periods.
- III. Legal provisions to facilitate the adoption and enforcement of the road transport requirements specified in the EU and UK Trade and Cooperation Agreement must be prioritized and adopted without delay.

2.2 How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?

RSA recommendation:

- I. There needs to be close collaboration between all parties to the EU-UK Trade and Cooperation Agreement to ensure full compliance and potential

misunderstandings are avoided and that road safety remains a key priority for all parties in respect of the implementation of the agreement.

3. Making Road Freight Cleaner

3.1 What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

RSA recommendations:

- I. 45% of the Irish goods fleet is 10 years or older. Newer fleet is designed to emit less atmospheric pollutants and is also equipped with better safety features that now focuses on protecting vulnerable road users as well as vehicle occupants. Incentives are needed by industry to replenish HGV fleet at a quicker rate.
- II. The EU Green Deal and other EU policy should be complemented by domestic incentives in Ireland to purchase cleaner vehicles, such as the development of public procurement policy and minimum requirements for tendering of public works. This thinking is also reflected in the EUs proposals for a Strategic Rollout Action Plan to support the AFID.
- III. The 10-year strategy will need to consider the introduction of Euro VII standards and potential for unintended consequences, including the risk of further increasing the average fleet age due to the likely increase in initial purchase costs.
- IV. Ireland's strategy for investment in decarbonisation of long-haul freight must take cognisance and is likely to be heavily influenced by emerging trends in vehicle technologies across the EU27 given that we share the roads.
- V. The Department's 10-year strategy may require a focused investment approach, based on what technology is most likely to become a sustainable long-term option for our heavy goods vehicles based on the European trend toward road freight decarbonisation.

3.2 What is needed to incentivise less polluting light commercial vehicles?

RSA recommendations:

- I. Additional national policy initiatives may be needed to expedite the retirement date of older combustion engines in Ireland, even after ICE production has slowed down.
- II. Strengthening the infrastructure and incentivising the development of consolidated goods distribution centres would promote sustainable freight distribution practices to encourage increased public and private sector uptake of N1 and N2 category EVs.
- III. There will be a need to align public and private market views on the key principles of the 10-year strategy in order that both follow a single trajectory towards decarbonisation, otherwise the strategy would be undeliverable.

3.3 Should eco-driving training be rolled out further, for example, as part of driver CPC training?

RSA recommendations:

- I. Eco-driving should be promoted so that there is wider adoption and use within the road haulage industry for the dual benefit of enhancing driving safety and improving vehicle emissions.
- II. Eco-driving needs to be a wider programme that extends beyond a short course training programme such as the CPC, and should include a mix of classroom, on-board monitoring and continuing driver feedback and training.
- III. Government should work with industry to promote and encourage the wider uptake of eco-driving. Initiatives may include subsidising costs of eco-driving courses and administrative support so that ecodriving is more accessible to small and medium enterprises involved in freight haulage.

3.4 Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

RSA recommendations:

- I. Initiatives to increase shared suburban hubs is likely to support increased EV uptake, reduce emissions and when managed well will serve to improve safety in our cities by removing large vehicles from our streets.
- II. An increase in Public Private Partnerships offering shared mobility may be needed in Ireland to drive EV light urban freight delivery solutions in a shorter timeframe than organic uptake will allow.

3.5 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.

RSA recommendations:

- I. Impartial technical advice is needed to empower the industry to confidently choose the most efficient vehicle and routing/distribution options when making capital investments.
- II. A better understanding of freight movements in Ireland is needed. Modelling, involving the use of onboard load sensors for data capture, is required to estimate average freight movement efficiency (volumetric utilisation) in an Irish setting to benchmark against EU averages.
- III. Other initiatives could include:
 - a. Longer semi-trailer trials on selected routes.
 - b. 'Safe City' and clean air permit trials.

- c. Retrofitting existing vehicles with aerodynamic devices and fairings that are type-approved for the vehicles they are fitted to.
- d. Low rolling resistance tyres.
- e. Vehicle platooning trials using vehicle cooperative adaptive cruise control (CACC).

4. Making Road Freight Transport Safer

4.1 What are the road safety priorities in road haulage for the next 10 years?

RSA recommendations:

- I. The proposals put forward in this part of the consultation are recommended for consideration in the context of the proposed road haulage strategy.
- II. Road safety must be the key principle underpinning the proposed road haulage strategy optimising outcomes for the economy and the road haulage industry and the measures contained in the Road Safety Strategy 2021 – 2030 fully implemented.
- III. The proposed road haulage strategy must be fully aligned and support the Road Safety Strategy.
- IV. An analysis of current data sources being collected in respect of HGV and LCV vehicles and activity including traffic count, safety, routing, HGV vehicle utilisation, cabotage, light vehicle use is an essential pre-requisite for proper planning, to inform decision making, increase efficiency and improve network management including road safety.
- V. Greater involvement by the haulage industry in the development of road safety measures and leveraging their support, where possible, may facilitate implementation.
- VI. Identification of systemic issues involving third parties in the supply chain causing or contributing to non-compliance by operators and drivers in the road haulage sector may inform new policy approaches towards improving operator compliance.
- VII. The benefits of chain of responsibility legislation should be explored making sure that all in the supply chain share responsibility for ensuring compliance with road safety requirements and that breaches of road safety requirements do not occur.
- VIII. New technological developments including transitioning to new forms of transport such as truck platooning and automation while staying on the envisaged trajectory of Vision Zero needs to be planned so that the benefits from a road safety perspective are realised at the earliest possible date.

4.2 How are these priorities best addressed?

RSA recommendations:

- I. Road safety priorities for the road haulage sector can best be addressed through the application of a Safe System approach to transport planning, priorities and implementation of a work-related road safety management system as envisaged in the Safe System approach contained in the Road Safety Strategy – the most effective approaches will be multi-faceted and systemic.
- II. Optimising compliance in the haulage sector requires updates to existing enforcement powers and facilities and sanctioning regimes and bringing the State into line with other Member States e.g., immobilisation of vehicles for cabotage, operator licensing offences, fixed charges together with complementary powers including provisions around information exchange between agencies that have a vested interest in road safety.
- III. Compliance measures must be implemented by means of a stepped response to behaviours by making it easy for those who want to comply and implementation of a credible and swift enforcement response to those who for their own reasons decide not to comply.
- IV. The current strategy of encouraging voluntary compliance should continue and formalised if possible, through the adoption of an ‘earned recognition’ or other assurance scheme for HGV operators to further incentivise compliance.
- V. There should be engagement by the RSA and the Department with the road haulage industry about the design of the compliance and enforcement strategy to be implemented in respect of the road haulage sector.
- VI. A consistent and authoritative approach to governing the road haulage industry should be an important guiding principle for the proposed haulage strategy.

4.3 What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?

RSA recommendations

- I. The measures proposals put forward in this part of the consultation are recommended for consideration in the context of the proposed road haulage strategy.
- II. RSA and the key road haulage associations should restore the practice of having quarterly meetings to discuss issues and matters of concern and affording each party to understand each other’s perspectives, fostering mutual respect and trust, clear understanding of roles and responsibilities and realistic expectations.
- III. Minutes of meetings/ summary accounts of meetings should be published by the RSA.
- IV. RSA to review the establishment of a forum to allow both of the main representative associations to engage with each other and the RSA and other agencies to review strategic issues including the possibility of a Road Haulage Road Safety Conference.



- V. A review should be undertaken to identify best practice models for engagement/structures put in place in other jurisdictions concerning road haulage matters and how this could be applied in an Irish setting.
- VI. Additional guidance be published for operators on making complaints concerning alleged illegal haulage activities and RSA requirements prior to investigation.
- VII. RSA enforcement plans be shared with the haulage associations annually including information on inspections of out of State operators.
- VIII. RSA to proactively engage with the road haulage associations about the European Commission rules on the algorithm for risk rating.
- IX. Explore the arrangements applied in other Member States concerning the Driver CPC course and what lessons could be applied in an Irish setting while fully respecting EU Directive requirements in respect of delivery methods and content.
- X. Keep the haulage associations informed of progress relating to the delivery of the commercial vehicle elements of the new Road Safety Strategy Transformation Programme.
- XI. Publish information on the numbers of non-State operators inspected and legal proceedings being taken for alleged offences.

4.4 What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?

RSA recommendations:

- I. The proposed road haulage strategy should acknowledge the importance of enforcement that the enforcement approach to be applied conforms with recommended best practice and the State affirms its commitment to this approach.
- II. While acknowledging that many operators have good road safety practices, positioning operators and drivers to comply with road safety obligations and to reduce the regulatory burden requires the application of an integrated system-wide approach to road safety regulation, compliance and enforcement and sustained buy-in from all operators.
- III. The current enforcement approach which promotes voluntary compliance should continue including the application of an intelligence led and risk based enforcement.
- IV. Compliance promotion, effective enforcement, maintaining institutional capacity, promoting inter-agency collaboration as well as vehicle technologies must be part of the regime to help operators comply with road safety regulations and to reduce the regulatory burden for smaller operators.
- V. Operator capacity must be increased – inspections could be put in place to show that a new operator for an operator licence has the capacity to comply with key requirements such as the drivers hours rules, downloading tools for digital tachographs, Driver CPC conformity, document management etc. Consideration



<p>should also be given to obliging Transport Managers undertake annual CPD courses.</p> <p>VI. RSA should continue to make it as easy as possible for operators and drivers to meet and comply with their obligations through simplified processes, centralised and online application options for services, simplified guidance material etc,</p> <p>VII. Adoption of a fixed charge system for road transport offences would reduce costs and administrative burden for operators found to be breaching rules.</p> <p>VIII. The existing toolkit for enforcement needs to be strengthened.</p>

5. EU Road Transport Policy (Mobility Package)
<p>5.1 What are your views on how Ireland implements the Mobility Package changes?</p> <p>RSA recommendations:</p> <ol style="list-style-type: none"> I. The proposed road haulage strategy needs to acknowledge the importance of effective and efficient enforcement to enforce the requirements of the EU Mobility Package. II. New legal provisions to facilitate the enforcement of the EU Mobility Package be adopted without delay. III. Deficits in the enforcement toolkit be addressed as a priority. IV. RSA staffing resources need to be augmented to enable the requirements in the EU mobility Package to be enforced on a consistent basis. V. Legal provisions to facilitate enforcement exchanges with other relevant agencies be adopted as soon as possible, and VI. A fixed charge system be adopted for road transport related offences which would also apply to the measures contained in the EU Mobility Package. VII. A review of the scope of operator licensing rules to include light commercial vehicles engaging in hire and reward within the State should be considered.
<p>5.2 What are your views on the return of the truck?</p> <p>RSA recommendations:</p> <ol style="list-style-type: none"> I. RSA should continue to engage with the EU Working Groups concerning a harmonised and practical application of the requirements contained in the EU Mobility Package including those relating to the return of the vehicle.

- II. RSA should publish simplified guidance material as soon as possible on the application of the relevant rules taking into account national legal requirements and the potential consequences of non-compliance, and
- III. RSA should engage with relevant stakeholders concerning the enforcement of the rules as soon as possible.

6. Road Infrastructure and Usage Charging

6.1 Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?

RSA recommendations:

- I. To accommodate forecasted freight demand and to ensure road safety, existing infrastructure must be optimised and the road haulage strategy must identify the future investment needs for road freight particularly along key gateways including the regions.
- II. Additional service and lay-by areas on the roads network to be provided for drivers to take breaks and rest periods. Larger service areas should include capacity for the carrying out of enforcement activities and this should be factored into future service area provision.
- III. Investigate options for greater collaboration/integration between the road freight sector and logistics sector in order to enhance sustainability and opportunities and identify potential barriers.
- IV. Identify and support digital infrastructure to support the road freight industry and deployment of freight technologies including data collection.
- V. Build long-term forecasting and modelling capacity for benchmarking, investment, planning and reform purposes including incentivising academic involvement/centre of excellence on the freight transport sector.

7. Labour Market and Skills

7.1 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.

RSA recommendations:

- I. Resolution of the particular issues associated with driver shortages is primarily the responsibility of the road haulage industry as well as dealing with the associated commercial issues.
- II. Market led and public policy actions are required – there is no one solution and a multifaceted approach is recommended including promotional measures to



improve the industry's image, encouraging young men and women into the driving profession, health promotion and other suggestions contained in the RSA response to this consultation.

- III. A multi-faceted and multi-agency approach working with the industry is required to address the skills and labour shortages in the road freight industry working with the wider logistics sector.
- IV. Addressing low levels of enforcement over the years, poor sanctioning regimes and deficits in the enforcement tool-kit must be part of the solution to dealing with those undermining compliant operators and who tarnish the image of the industry.
- V. A survey of operators and drivers is required to identify skills shortage and longer term needs and possible options to address the work-force challenges in the road freight industry.
- VI. In collaboration with the industry, create opportunities for pathways into the HGV driving profession.
- VII. Attract women into the HGV driving profession as well as opportunities for greater diversity.
- VIII. Working with the industry, promote the importance of the industry including opportunities for advancement, upskilling etc.
- IX. Additional resting areas be made available for drivers of HGV goods vehicles on the roads network.
- X. Collaborate with the industry about a survey of drivers on the issues of concern to them including HGV driver fatigue, working time patterns, pay levels, risks, collisions, skills gaps and obtain an understanding of longer term needs and possible opportunities to address labour and skills shortages.

7.2 How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?

RSA recommendations:

- I. Improving the perception of the roles in the haulage and wider logistics is primarily the responsibility of the road haulage industry as well as dealing with the associated commercial issues including wages, terms and conditions, work-life balance as well as compliance matters.
- II. Industry needs to be supported to promote fairer competition in the intensely competitive industry through better enforcement and resolution of deficits from the enforcement perspective.
- III. Collaborate with industry to obtain HGV driver and operator perspectives on the industry in respect of issues affecting them including labour and skills shortages.
- IV. Enhance the role of the Transport Manager through CPD.



7.3 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?

RSA recommendations:

- I. Market-led solutions will be necessary to enable the industry retain and attract talent into the driving profession.
- II. Supporting measures could be implemented by the public sector to ensure fair competition and that non-compliant operators are targeted and encouraged to improve standards.
- III. The RSA consideration of this question contains possible options that may be relevant for further consideration for the haulage industry.

8. Integrated Transport Planning and Intermodal Transport

8.1 Is freight transport being taken into account sufficiently within Ireland's integrated transport planning system, particularly the various transport strategies for urban areas?

RSA recommendations

- I. Road freight transport must continue to be taken into account in the development of Irelands transport planning system and road safety must be at the heart of that system.
- II. Further extensions of the inter-urban network should be considered taking into account national strategic objectives in respect of mobility, climate changes, regional development and road safety.

ROAD SAFETY AUTHORITY RESPONSE TO THE DEPARTMENT OF TRANSPORT CONSULTATION

10-year Strategy for the Haulage Sector First Consultation Document

Introduction

This document sets out the Road Safety Authority's views and responses to some of the questions contained in the Department of Transport Consultation on a 10 year strategy for the road haulage sector. Each of the questions in the consultation and the RSA responses has been numbered to facilitate referencing. Where a question is not being responded to by RSA, this means that the RSA is not making a submission in respect of a particular question.

The Department's consultation process provides an opportunity for an effective dialogue with trade associations, public agencies, operators, drivers and others to set out their ideas for a road haulage strategy to shape the road haulage industry over the next 10 years against a backdrop of significant challenges facing the industry. These challenges include:

- Decarbonisation and carbon tax;
- skills and driver shortages;
- Rising fuel and insurance costs;
- Government's new Road Safety Strategy;
- disruptive technological developments and transport automation;
- Brexit impacts:
- Supply chain integration;
- Strict schedules associated with altering customer expectations; and
- EU Mobility Package.

Other challenges managed by operators includes remaining commercially viable and efficient and competing to satisfy customer expectations in an increasingly competitive road haulage market.

The development of the road haulage strategy provides an opportunity to:

1. develop a strategic plan and conditions for an efficient, sustainable and safe road haulage industry to meet the future challenges;
2. liaise with the industry to obtain their viewpoints and plans concerning the decarbonisation agenda and conversion of the fleet to a low carbon future;

3. provide a defined pathway to align the public and private efforts and investment in Ireland to facilitate a more successful transition to a lower and zero emissions for the road haulage industry, that might otherwise diverge;
4. develop a skills roadmap needed by the industry in the short and medium term recognising that the main responsibility for addressing skills shortages lies with the industry;
5. identify the potential risks and opportunities for the road freight industry over the next 10 years;
6. identify the data-sets and estimator tools necessary to facilitate better planning and decision making for the road haulage industry, to facilitate load, route and fleet optimisation to counteract harmful consequences such as increasing environmental emissions and urban air quality impacts;
7. develop a platform for further investment in important infrastructure to facilitate efficient, safe and sustainable road freight transport system including modal shift recognising that freight transport is a key enabler for economic, industrial and social policy; and
8. provide a platform for collaboration with key stakeholders on road freight transport.

In our response, we have set out certain road safety priorities for consideration in the development of the road haulage strategy for the next 10 years with road safety being at the heart of the overall strategy for this key sector of the economy. We highlight the importance of enforcement and compliance to ensure a level playing field for all operators, as the demand for haulage services rapidly expands and at a time when the traditional forms of freight transport may be replaced in part by new and novel forms of goods delivery. The core aim of the Authority is to save lives and prevent injuries – the new Road Safety Strategy based on the Vision Zero/Safe System approach sets out plans to reduce fatalities and serious injuries on the roads by 50% over the next 10 years.

Vision Zero is a serious commitment to end all death and serious injuries on our roads by 2050. Vision Zero will be delivered through embedding the Safe System approach, which underpins the next government Road Safety Strategy 2021 - 2030, into our national road safety policy and practice. Critically, we need even greater partnership and collaboration to achieve the ambitious target of Vision Zero as well as the targets to 2030 of a 50% reduction in death and serious injuries on our roads.

Seven Safe System priority interventions areas have been identified for the 2021-2030 Road Safety Strategy with the aim for each provided below. These seven intervention areas will drive the scope of road safety work over the next decade and beyond.

1. Safe Roads and Roadsides: to improve the protective quality of our roads and infrastructure.
2. Safe Speeds: to reduce speeds to safe, appropriate levels for the roads being used.
3. Safe Vehicles: to enhance the safety features and roadworthiness of vehicles on our roads.
4. Safe Road Use: to improve road user standards and behaviours in line with traffic legislation, supported by enforcement.

5. Post-Crash Response: to improve the treatment and rehabilitation of collision casualties.
6. Safe and Healthy Modes of Travel: to promote and protect road users engaging in public or active transport.
7. Safe Work-Related Road Use: to improve safety management of work-related journeys.

While all areas have relevance to road safety in the Haulage Sector Strategy, four intervention areas in particular are important for the haulage sector. Further information concerning the application of these intervention areas is contained in Appendix A of this submission.

Ireland's Haulage Fleet Profile

Road Safety Authority's data shows the following travel profile of commercial goods vehicles (based on distance travelled between 2018 and 2019) in Table 1:

Table 1: Average annual distance (Kilometres) per test category'	
Test Category	Average Annual Distance (Kilometres)
Goods > 3,500kg < 7,500kg	17,539
Goods > 7,500kg 2 Axle	48,086
Goods > 7,500kg 3 Axle	73,294
Goods > 7,500kg 4+ Axle	45,502
Goods Vehicle < 3500kg	22,476

In terms of the volume of commercial goods vehicles with an annual distance of at least 100,000 kilometres or greater, Table 2 presents the findings:

Table 2: Volumes of vehicles with annual distance $\geq 100,000\text{km}^2$	
Test Category	No. Vehicles
Goods > 3,500kg < 7,500kg	68
Goods > 7,500kg 2 Axle	2,034
Goods > 7,500kg 3 Axle	2,790
Goods > 7,500kg 4+ Axle	98
Goods Vehicle < 3500kg	693

1. COVID-19

Introduction

As part of the national response to the COVID-19 pandemic, Ireland classified HGV truck drivers as 'essential workers' and exempted them, and other logistics workers, from certain COVID restrictions. However, aspects of the support services necessary to support the operations of the road haulage industry during the pandemic including safety which included CVRT testing as well as enforcement were suspended at the time. Across Europe, HGV drivers experienced longer delay times at border crossings related to additional health requirements implemented by some other Member States in response to the pandemic. Some drivers encountered difficulties in accessing basic facilities at some locations including access to sanitation and resting facilities, food and fresh-water during the initial response to the pandemic.

While HGV drivers and operators have been lauded as keeping key supplies in the shops, hospitals and industry generally during the pandemic, it has also made some of the current problems in the industry more visible in terms of driver shortages, low rates for services, low profitability, unfair competitive practices and poor working conditions. These issues will impair the capacity of operators to respond to new and emerging challenges facing the road haulage industry in the immediate to long term including any future pandemic.

1.1 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?

From the RSA perspective, the key priority is that the road haulage industry continues to adhere to good road safety practices during the pandemic and that road safety is being managed in the same way as any other risk including Covid risks.

With the benefit of hindsight, the issues that emerged during the crisis in respect of commercial vehicle operations and enforcement included the following:

- Absence of a coordinated response from the EU in terms of derogations from the driving and resting time rules causing unnecessary complexity for drivers undertaking international journeys including harmonised approaches in terms of extensions to driver licences, Driver CPC certs, roadworthiness certificates, tachograph calibration certs etc.
- Availability of support services for commercial vehicle operations such as repair and maintenance services, vehicle testing, tachographs calibration, enforcement etc.
- Difficulties encountered by HGV drivers accessing suitably equipped facilities at locations including sanitation, food etc as well as secure park-up at locations;
- Need for contingency plans to be put in place to cater for pandemics including severe weather events likely to adversely impact supply chains in the future;
- Vaccinations and personal protection equipment for HGV drivers must be prioritised in the event of future pandemics.

1.1 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?

RSA recommendations:

- I. Contingency plans must be put in place to cater for future pandemics including other events likely to significantly disrupt the HGV sector and supply chains.
- II. National responses to pandemics must ensure that the road haulage industry including essential support services such as CVRT testing, repair garages, enforcement are available to the industry to support service provision.
- III. Vaccinations and personal protection equipment for HGV drivers must be prioritised in future pandemics.
- IV. HGV drivers must have access to suitably equipped facilities at locations including sanitation, food as well as park-up facilities; and
- V. A coordinated and EU wide approach be implemented in respect of derogations from driving and resting time rules, extensions to driver licences, Driver CPC certs etc should be explored.

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

Criterion for the granting of derogations from the EU driving and resting time rules should be published to accommodate engagement with industry concerning where derogations can be sought and the information requirements to be provided in consideration of any such applications.

A harmonised and coordinated response to future pandemics across the EU should be explored or at least that this is reviewed at a national level.

A tailored approach should be implemented by the Garda Síochána and Road Safety Authority to undertake a level of commercial vehicle enforcement during future pandemics rather than complete suspensions of activity recognising resource availability and protective measures and keeping enforcement as visible as possible.

Commercial vehicle drivers engaged on international road haulage activities be prioritised for vaccinations and/or health testing regimes in future pandemics.

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

RSA recommendations:

- I. Criterion for the granting of national derogations from the EU driving and resting time rules should be prepared and published taking into account EU Commission guidance.
- II. The RSA and Garda Síochána should ensure a minimum level of commercial vehicle enforcement in future pandemics keeping road safety including commercial vehicle enforcement as visible as possible while recognising resource availability and health and safety measures.
- III. A harmonised and coordinated contingency plan to facilitate the continued operation of road transport provision in future pandemics across the EU should be explored.

2. Brexit

Since 1 January 2021, the consequences of Brexit has had an impact on the road haulage and logistic industry and these impacts are likely to have far-reaching consequences for the road haulage sector as the full effect of Brexit becomes clearer. In the immediate aftermath of the Brexit deal and despite some evidence of stockpiling, there has been reports of supply chain disruption involving customs checks at the ports which have eased as operators and drivers and the wider supply chains have become familiar with the new processes and documentation requirements.

The EU and UK Trade and Cooperation Agreement includes road transport provisions, and these essentially replicate the existing EU requirements in respect of driving and resting times, tachograph, operator licensing: the agreement was not formally ratified by the EU until end April 2021. Measures were agreed in respect of driver licensing including driver licence exchanges between the EU and UK prior to Brexit coming into effect.

2.1 What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?

The RSA response to this question is confined to (i) the road safety aspects of the EU and UK Trade and Cooperation Agreement (EU-UK TCA) as applies to HGV vehicles and (ii) factors likely to impact on road safety in respect of the movement of goods vehicles through border points in the State particularly through Dublin Port and Rosslare Port. Any sectoral adaptation plan for the road haulage sector must be based on available data and adjustments are supported by appropriate evidence to moderate the impacts of Brexit.

The immediate concern of the Authority is twofold:

1. delays/congestion at border crossings may have a direct impact on the capacity of drivers to comply with the tachograph and drivers' hours rules which may result in additional requests for derogations being made and the expectation that they should be granted for reasons relating to the Brexit difficulties and operators breaching rules.
2. Legal provisions with which to enforce the relevant rules specified in the EU and UK TCA against UK and NI operators and drivers in respect of driving and resting times, cabotage as well as driver CPC have not been put in place. Not only is this a concern from the road safety perspective, but issues relating to fair competition between UK/NI and EU operators also arise.

EU and UK Trade and Cooperation Agreement (EU and UK TCA)

The RSA welcomes the EU and UK TCA agreement which brings some certainty concerning rules between the UK and EU relating to the regulation of driving and resting times of HGV drivers, measures relating to access to the profession, road transport enforcement, cabotage and enforcement measures. The EU – UK TCA reflects commitments to respecting a number of fundamental principles underpinning road haulage and road safety although falling short of the full requirements for participation in the Single Market. The EU-UK TCA will affect the transport sector already reeling from the unprecedented impacts associated with the COVID pandemic and enforced shutdown for large parts of the national economy.

Customs and Border controls resulting from Brexit increase the potential for delays to HGV operators and drivers causing difficulties in complying with the EU driving and resting time rules by HGV drivers, increase firms' logistics costs and risk perishable goods expiring – the consequences of which may result in haulier's insurance costs increasing or not being paid

for a journey. The EU driving and resting time rules are designed to mitigate the effects of HGV driver fatigue. Brexit is therefore a risk to road safety as well as potentially undermining the profitability and viability of road transport operators providing international services to and from or transiting the UK.

A further concern is that Brexit, and the pandemic will have further exacerbated HGV driver shortages - some drivers have returned to the country of origin during the lockdown and restricted travel.

On a strategic level, it is essential that the necessary legal provisions to adopt and enforce the EU and UK TCA agreement are addressed as a priority and the tool-kit for enforcement by RSA and the Garda Síochána for enforcing these provisions and road transport legislation generally is updated in keeping with the practices elsewhere. It is the RSA view that a failure to adopt legal provisions to facilitate enforcement of the EU and UK TCA against UK and NI operators and drivers combined with weaknesses in the tool-kit for enforcement (such as absence of powers to immobilize vehicles for breaches of rules) will, at least, create the conditions resulting in non-compliance and unlawful activities persisting and this will undermine road safety. Effective enforcement of road transport rules is an inseparable part of (i) the EU and UK TCA and (ii) road safety policy at all levels of governance and it must be applied equitably to all operators engaging in international road transport activities. The same ground-rules must apply to UK and NI operators and EU operators when competing on services and from the enforcement perspective – this will facilitate a level playing field.

2.1 What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?

RSA recommendations:

- I. Procedures relating to Customs checks and other controls should be streamlined to the greatest extent possible in order to minimize delays at border crossing points so that operator and driver compliance with the EU driving and resting time rules is assured.
- II. Network management must be optimized to alleviate concerns about HGV vehicle congestion to and from and within Dublin Port which should include space to accommodate drivers required to take breaks and rest periods.
- III. Legal provisions to facilitate the adoption and enforcement of the road transport requirements specified in the EU and UK Trade and Cooperation Agreement must be prioritized and adopted without delay.

2.2 How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?

The process of adapting to Brexit impacts by the haulage sector has been evolving and will continue to do so over the coming years. While the EU-UK TCA provides a degree of certainty in respect of certain rules, unilateral decisions by the UK in respect of road transport requirements will have direct and immediate impacts on Irish haulage operators. At a strategic level, there needs to be close collaboration between all partners to the agreement to ensure full compliance and misunderstandings are avoided and that road safety is prioritised.

The road haulage sector's views may be conditioned by how effectively the agreed measures contained in the EU and UK TCA are implemented by the State and policed and their concerns

addressed particularly from the perspective of network management, coordination, recognition of qualifications, fair and proportional enforcement.

Given how recently the EU and UK TCA was agreed, there have not been any changes to the rules as yet nor any indication that either party will require changes in the short to medium term. Whilst there is agreement for regulatory cooperation and alignment, much of the detail remains open to future agreement between the parties. For now, all parties are operating within the agreed regulatory approaches.

2.2 How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?

RSA recommendation

- I. There needs to be close collaboration between all parties to the EU-UK Trade and Cooperation Agreement to ensure full compliance and potential misunderstandings are avoided and that road safety remains a key priority for all parties in respect of the implementation of the agreement.

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

One of the major challenges to be addressed in the 10-year Road Haulage Strategy is the decarbonisation of road freight at a time when the modelled future demand is indicating a significant increase in road freight activity. Road freight activity has increased, with an 7.5% increase in 2019 (from 2018) to the highest level seen in ten years (12.403bn tonnes km)³. This upward trend is predicted to continue, with over three times the global freight demand expected by 2050.⁴

Freight movement in Ireland is dominated by road haulage, which is, at present, almost wholly reliant on diesel-fuelled vehicles. Good vehicles accounted for approximately 13% of the national fleet, based on 2019 licensed vehicle records. During 2019, >99% of good vehicles were diesel or petrol powered, with less than 1% (0.17%) electric, hybrid or alternatively fuelled. Heavy Goods Vehicles and Light Goods Vehicles combined account for nearly 22% of total emissions from the Transport sector and therefore are disproportionately represented in terms of emissions share.

Concurrently, there is pressure on the road haulage industry to move towards low carbon solutions, with demand from larger distribution businesses and internet entrepreneurs for low and net-zero carbon footprints for their products.

In order to reach net-zero emissions by 2050, it is the Road Safety Authority's view that the Department's 10-year strategy would need to incorporate the following:

The provision of high-quality impartial information

The Irish haulage industry can be empowered to confidently choose the most efficient vehicle and routing/distribution options when making capital investments, but only when impartial trustworthy technical advice is available such as calculator tools and payback estimators that take into account realistic performance and re-sale value of assets.

The information would enable operators to make the right choices on whether to choose electric drivetrains or other alternative fuelled technologies, taking into account their freight distribution patterns and typical cargo size, etc. to support an informed move away from diesel and petrol vehicles.

The Sustainable Energy Authority of Ireland (SEAI), in their guide for businesses 'Switching to Electric Vehicles' have provided information for lighter goods fleet. Similar information for heavier fleet operations would be useful step towards decarbonising the fleet, to be developed and updated in consultation with key stakeholders and automotive and policy experts.

Modelling is also needed to estimate average freight movement efficiency (volumetric utilisation) in an Irish setting to benchmark against EU averages.

Changes in EU policy and standards

45% of the Irish goods fleet is 10 years or older. This is undesirable both from an environmental and road safety perspective. Newer fleet is designed to emit less atmospheric pollutants and is also equipped with better safety features that now focuses on protecting vulnerable road users as well as vehicle occupants. Replenishing the Irish fleet with cleaner vehicles, i.e., transition away from traditional combustion (petrol/diesel) therefore fulfils two important societal briefs.

The automotive industry's commitments to move away from petrol and diesel engine production has focussed on mainly passenger cars to date. Recognising this shift may not occur for some time, the EU have developed legislative plans for a Euro 7/VII standard from 2025 for cars, vans, trucks and buses. While this standard is aimed at reducing NOx concentrations from tailpipe emissions, therefore largely aimed at tackling urban pollution issues, the 10-year strategy will need to consider and counteract the unintended consequences of the Euro VII standards on the Irish fleet, including the risk of increasing the average fleet age due to the likely increase in initial purchase costs and maintenance costs associated with more complex emissions control technologies to deliver Euro VI.

The volume of imports of used Euro V goods vehicles increased around the time of the transition to Euro VI due to increased initial purchase and maintenance costs. Since then, vehicle duties and taxes associated with importing used right-hand drive vehicles from the UK have increased, impacting the demand for used imports. Due to Brexit, the Euro V/VI issue is not likely to be repeated to the same order of magnitude during the transition from Euro VI to Euro VII vehicles. However, hauliers may choose to retain their existing fleet for longer than would otherwise be the case.

The EU Green Deal and other EU policy designed at de-fossilising road transport should be complemented by domestic incentives in Ireland to purchase cleaner vehicles, such as the development of public procurement policy and minimum requirements for tendering of public works. This thinking is also reflected in the EU's proposals for a Strategic Rollout Action Plan to support the Alternative Fuel Infrastructure Directive (AFID) 2014/94/EU.

3.1 What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

The path is not certain for decarbonising long-haul operations. Technological solutions for electrifying larger HGVs are at a relatively early stage of development and not yet available for deployment across the HGV fleet. There is also debate around the net carbon emissions of alternative fuel use.

Nonetheless, battery electric trucks will have a future role to play in the decarbonisation of road freight transport. In the long term, market uptake is expected in battery electric trucks. Irish long-haul trucks on international journeys will require an EU-wide network of charging points. Likewise, international trucks entering Ireland will expect a network of EV charging points, at a minimum along the Irish TEN-T network. Therefore, Ireland's strategy for investment in decarbonisation of long-haul freight must take cognisance and is likely to be heavily influenced by emerging trends across the EU27 given that we share the roads.

Battery electric trucks will require a network of higher power charging points at logistics hubs and lower power points for overnight charging.

It is the RSA's view that the 10-year strategy should include an analysis of available grid power around potential charging points (e.g., truck stop locations across Ireland) to address feasibility concerns of the Irish haulage industry.

Hydrogen fuel cell technology shows promise, however this will also require substantial investment in supporting infrastructure. Therefore, hydrogen will also need time to materialise as a viable ICE replacement option in Ireland.

There has been significant progress made in Ireland (e.g., Causeway project) in terms of policy, incentives, piloting of CNG options in Ireland.

Considering that there are several pathways to decarbonisation available with significant investment needed for each path, the Department's 10-year strategy may require a focussed investment approach, based on what technology is most likely to become a sustainable long-term option for our heavy goods vehicles based on the European trend toward road freight decarbonisation. This may mean a slower route to HGV decarbonisation, involving only sustainable investment. Ongoing contact with the EU's automotive stakeholders and policy makers will be key to deciding the focus.

The revision of the EU's AFID on the deployment of alternative fuels infrastructure may provide guidance in developing of the 10-year strategy, as one of the key reasons for its revision is to focus on infrastructural needs in heavy-duty vehicle infrastructure.

HGV decarbonisation incentivisation

Specific focus is needed in the 10-year strategy on decarbonising heavy good vehicles (HGVs). At the present time, there are very few options for the decarbonisation of HGVS based on the state of readiness of battery technology, however numerous OEMs are involved in the development of fuel cell trucks. Hydrogen fuel cell electric buses are more advanced than battery electric buses, with trials of these vehicles undertaken in Dublin at the latter end of 2020 by consortium Hydrogen Mobility Ireland, which have shown promising results. Hydrogen has many advantages for the haulage sector including quick refuelling, longer range and clean output (water).

Once the 10-year strategy is developed for the decarbonisation of the Irish road haulage sector, be it electric fuel cell, hydrogen, CNG or a hybrid model, some form of incentivisation will be needed (as outlined above), primarily to bridge the gap between the purchase price of conventional vehicles and their more expensive alternatively fuelled counterparts. The level of purchase incentive for each type of vehicle may be based on the net carbon emissions, using a 'well to wheel' view of each vehicle technology.

Based on RSA's research of incentivisation in other countries, measures may include company tax rebates on the purchase cost of refuelling equipment, vehicle purchase grants (similar to those in place in Ireland for battery electric vehicles), VRT exemptions, preferential annual road tax, recharging infrastructure capital support, lower fuel duty, toll incentive schemes and national innovation programmes. Countries such as Germany have extended vehicle purchase grant schemes to plug-in second-hand vehicles, which could be useful in addressing the Irish issues of increased fleet age and EV depreciation concerns.

Early industry adopters of new low carbon technologies need to be supported financially. Currently there is no incentivisation or grant support for electric fuel cell or hydrogen fuel cell heavy goods vehicles. Existing schemes should be expanded to HGVS.

Infrastructure provision will be driven by demand and therefore it will be a task for the Department to create conditions through policy to introduce these alternatively fuelled LGVs and HGVs. In particular, it is important to attract the vehicle user interest in order to build a viable business case for private sector investment in HGV recharging and production/refuelling technologies in Ireland. Commitment will be needed from the Irish road haulage industry in terms of providing a captive fleet to support the business case for Ireland.

3.1 What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?

RSA recommendation:

- I. 45% of the Irish goods fleet is 10 years or older. Newer fleet is designed to emit less atmospheric pollutants and is also equipped with better safety features that now focuses on protecting vulnerable road users as well as vehicle occupants. Incentives are needed by industry to replenish fleet at a quicker rate.
- II. The EU Green Deal and other EU policy should be complemented by domestic incentives in Ireland to purchase cleaner vehicles, such as the development of public procurement policy and minimum requirements for tendering of public works. This thinking is also reflected in the EUs proposals for a Strategic Rollout Action Plan to support the AFID.
- III. The 10-year strategy will need to consider the introduction of Euro VII standards and potential for unintended consequences, including the risk of further increasing the average fleet age due to the likely increase in initial purchase costs.
- IV. Ireland's strategy for investment in decarbonisation of long-haul freight must take cognisance and is likely to be heavily influenced by emerging trends in vehicle technologies across the EU27 given that we share the roads.
- V. The Department's 10-year strategy may require a focussed investment approach, based on what technology is most likely to become a sustainable long-term option for our heavy goods vehicles based on the European trend toward road freight decarbonisation.

3.2 What is needed to incentivise less polluting Light Commercial Vehicles?

EV technology is more advanced for light commercial vehicles and a number of incentives are already in place for the purchase of N1 vehicles.

The RSA's view is that strengthening the infrastructure and incentivising the development of consolidated goods distribution centres would promote sustainable freight distribution practices to encourage increased public and private sector uptake of N1 and N2 category EVs.

Confidence regarding re-charging infrastructure is a common concern and influencing factor for all road haulage business, and the following recommendations in this respect apply to both heavy and light commercial vehicles.

Some recommendations that are common to HGV and LGV incentivisation include:

Production, supply, charging and re-fuelling infrastructure

National plans and details of upcoming investment in smart re-charging infrastructure for electric vehicle charging and hydrogen refuelling stations (HRS) need to be visible to enable the Irish Industry to confidently choose electric and alternatively fuelled vehicles. This would include the publication of a map of the planned national network of Hydrogen and EV refuelling/recharging stations.

There is a task for Government to build public confidence around the medium- and long-term availability of supply of electricity and hydrogen to power the new technologies and to counteract any perceived gap in future supplies, that may currently impede alternatively fuelled vehicle uptake. In the case of hydrogen, this may take the case of on-site electrolyzers.

Collaboration is necessary with other Member States and third countries (such as the UK) to produce joint infrastructure maps to alleviate potential industry concerns regarding re-fuelling options on international journeys. Brexit may be of concern in the context that the UK may move on a different trajectory in terms of its alternative fuel investment and associated infrastructure and this would need to be addressed in the 10-year strategy.

The long-term solution, as outlined in the AFID is for a dense, wide-spread network of alternative fuel infrastructure throughout the EU. The EU-wide aspect will be important to Irish companies who operate on international routes.

Finally, there will be a need to align public and private market views on the key principles of the 10-year strategy in order that both follow a single trajectory towards decarbonisation, otherwise the strategy would be undeliverable.

End to ICE (internal combustion engine) vehicle production

EU policy (for example, introduction of Euro VII emission standards) and decreasing market demand are likely to dictate an end date for the last internal combustion engines to roll off the production line, whether organically through increasingly stringent tailpipe emission standards and better incentives to purchase alternatively fuelled vehicles or through direct policy intervention by the EU.

The 10-year strategy can assist in delivering this challenge through expanding its incentivisation and grant schemes for low and ultra-low emission vehicles.

Once viable alternatives are available and in widespread use, retire older ICE vehicle fleet in Ireland

Additional national policy initiatives may be needed to expedite the retirement date of older combustion engines in Ireland. The choice by hauliers to retire older vehicles may also be influenced by decreasing future activity in the automotive sector in the production of internal combustion engines.

Other fuel types

Consideration should also be given to the viability of wider scale use of CNG, and LNG liquefied and compressed natural gas (LNG and CNG), biomethane, and liquid biofuels (e.g., biodiesel) to fuel HGV fleet operations.

Uptake of cleaner vehicles in Ireland will be driven nationally by policy support and incentives and by accelerated investment in charging and re-fuelling infrastructure. Global drivers will be as important to Ireland as national measures and will include the evolution of battery

technology and lower costs for lithium-ion batteries. These drivers are enablers for the road haulage Industry to make affordable and confident choices in new vehicle fleet.

Technology associated with alternatively fuelled and electric drivetrains can weigh more than ICE equivalents. This is a potential deterrent for hauliers if their payload is reduced in order to carry the additional weight of, for example, battery technologies, while remaining compliant with vehicle weight limits. To counteract this the Road Safety Authority has submitted draft legislation to the Department of Transport to permit higher weight limits for alternatively fuelled and ‘zero-emission’ vehicles in order that payload is not impacted in comparison with traditional ICE vehicles. This draft legislation is in line with EU regulation on weights and dimensions of vehicles circulating within the EU.

The Road Safety Authority has also increased the maximum allowable mass (MAM) of vehicles that Category B driving licence holders can operate from 3.5 tonne to 4.25 tonne for alternatively fuelled vehicles to account for their heavier drivetrains. This was on foot of changes to the EU Driver Licensing Directive.

3.2 What is needed to incentivise less polluting light commercial vehicles?

RSA recommendation:

- I. Additional national policy initiatives may be needed to expedite the retirement date of older combustion engines in Ireland, even after ICE production has slowed down.
- II. Strengthening the infrastructure and incentivising the development of consolidated goods distribution centres would promote sustainable freight distribution practices to encourage increased public and private sector uptake of N1 and N2 category EVs.
- III. There will be a need to align public and private market views on the key principles of the 10-year strategy in order that both follow a single trajectory towards decarbonisation, otherwise the strategy would be undeliverable.

3.3 Should eco-driver training be rolled out further, for example, as part of Driver CPC training?

The Road Safety Authority is of a view that eco-driving should be promoted so that is wider adoption and use within the road haulage industry for the dual benefit of enhancing driving safety and improving vehicle emissions.

Several studies have proven a direct link between driver behaviour and vehicle emissions. Varying factors impact on road safety and transport emissions, including vehicle condition, fuel type and the age, make and model of the vehicle. Studies have proven this link.⁵⁶

Eco-driving extends beyond driving techniques and includes maintenance procedures and vehicle checks to achieve greater vehicle fuel efficiencies, to reduce emissions and costs and to improve the safety standards of vehicles on Irish roads. Eco-driving training is more effectively implemented when supplemented by in-cab technologies that monitor driving on an ongoing basis and provide performance feedback to drivers and fleet managers. In-cab coaching via telematics has been successful in many countries and across many industries. Theoretical and simulator training in the absence of real-time feedback may in

some cases be ineffective in sustaining eco-driving behaviour, therefore eco-driving needs to be a wider programme that extends beyond a short course training programme such as the CPC, and should include a mix of classroom, on-board monitoring and continuing driver feedback and training. Keeping vehicles well maintained and optimising the mix of vehicles within the fleet can also contribute to improved fuel efficiency.

The skill with which the vehicle is controlled, the average speed and the frequency of idling all have a major impact on fuel consumption efficiency. Schneider National conducted a study on its own fleet (approximately 12,000 drivers) and determined that the safer a driver the better their fuel economy. It is estimated that up to 30% of hauliers costs are associated with fuel consumption, therefore eco-driving can be a very effective way of reducing fuel costs in an industry that operates on a tight margin.

In Ireland, the majority licensed hauliers have a fleet size of less than 5 vehicles and this may present a barrier to adopting telematics-based eco-driving due to the costs and administrative efforts involved relative to the scale of operations.

The uptake of eco-driving may be hindered by a lack of trusted information on the associated fuel savings, as well as the costs of purchasing and retrofitting equipment and wider pressures on driver and fleet manager's time.

It is the RSA's view that there is a role for Government to work with industry to promote and encourage the wider uptake of eco-driving through impartial information, recommendations and media campaigns. Initiatives may include subsidising costs of eco-driving courses and administrative support so that eco-driving is more accessible to small and medium enterprises involved in freight haulage.

3.3 Should eco-driving training be rolled out further, for example, as part of driver CPC training?

RSA recommendation:

- I. Eco-driving should be promoted so that there is wider adoption and use within the road haulage industry for the dual benefit of enhancing driving safety and improving vehicle emissions.
- II. Eco-driving needs to be a wider programme that extends beyond a short course training programme such as the CPC, and should include a mix of classroom, on-board monitoring and continuing driver feedback and training.
- III. Government should work with industry to promote and encourage the wider uptake of eco-driving. Initiatives may include subsidising costs of eco-driving courses and administrative support so that eco-driving is more accessible to small and medium enterprises involved in freight haulage.

3.4 Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

Electric drivetrains will provide a solution for fleet operations on urban only and regional duty cycles. This technology is available for light goods vehicles and may be a viable option for smaller HGVs depending on their route patterns. Increased availability and usage of shared suburban logistics hubs on the periphery of large urban areas in Ireland will support the exclusion of larger goods vehicles from our large towns and cities. Initiatives to increase shared suburban hubs is likely to support increased EV uptake, reduce emissions in urban areas and also CO₂ emissions from increased EV reliance, and if managed well will serve to improve safety in our cities by removing large vehicles from our streets.

An increase in Public Private Partnerships offering shared mobility may be needed in Ireland to drive EV light urban freight delivery solutions in a shorter timeframe than organic uptake will allow.

3.4 Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

RSA recommendation:

- I. Initiatives to increase shared suburban hubs is likely to support increased EV uptake, reduce emissions and when managed well will serve to improve safety in our cities by removing large vehicles from our streets.
- II. An increase in Public Private Partnerships offering shared mobility may be needed in Ireland to drive EV light urban freight delivery solutions in a shorter timeframe than organic uptake will allow.

3.5 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.

The Road Safety Authority recommends the following areas of research be pursued as part of the 10-year road haulage strategy:

- Longer semi-trailer trials on selected multi-lane routes – inviting expressions of interest from industry to reduce traffic movements;
- ‘Safe City’ and clean air permit trials;
- The impact on emissions of retrofitting existing vehicles with aerodynamic devices and fairings that are type-approved for the vehicles they are fitted to;
- The cost and emission efficiencies of using low rolling resistance tyres;
- Researching Irish logistics efficiency through on-board load sensors;
- Vehicle platooning trials using vehicle to vehicle wireless communications and cooperative adaptive cruise control (CACC) to assess impact of aerodynamic drag reduction on emissions.

3.5 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.

RSA recommendations:

- I. Impartial technical advice is needed to empower the industry to confidently choose the most efficient vehicle and routing/distribution options when making capital investments.
- II. A better understanding of freight movements in Ireland is needed. Modelling, involving the use of onboard load sensors for data capture, is required to estimate average freight movement efficiency (volumetric utilisation) in an Irish setting to benchmark against EU averages.
- III. Other initiatives could include:
 - a. Longer semi-trailer trials on selected routes.
 - b. 'Safe City' and clean air permit trials.
 - c. Retrofitting existing vehicles with aerodynamic devices and fairings that are type-approved for the vehicles they are fitted to.
 - d. Low rolling resistance tyres.
 - e. Vehicle platooning trials using vehicle cooperative adaptive cruise control (CACC)

4. Making Road Freight Transport Safer: Road Safety Regulation

Road haulage industry overview

The road haulage industry is intensely competitive, price sensitive and there are some instances of illegal behaviours and practices in the industry – many well-run operations are being undermined from the competitiveness perspective as a consequence of alleged illegal activities and this has been a subject of many complaints by the road haulage representative associations over the years. There is also evidence that Irish operators are ‘flagging out’ some of their operations abroad as part of a cost reduction strategy.

Flagging out in itself is not specifically illegal but some operators believe that the practice may be used to gain an unfair competitive advantage against operators in the State.

Brexit and the COVID pandemic appears to have altered supply chains including the numbers of Irish operators transiting through the UK while en-route to the Continent – it is too early to conclude if these changes will be permanently adopted. The COVID pandemic has also seen significant growth in delivery services by light commercial vehicles and this trend is expected to continue in the future. Logistical decisions impacted by stockpiling resulting from Brexit/pandemic or internet purchases may influence space requirements and location of logistical hubs and thus creating additional freight traffic demand in localities.

Demand for hire and reward road haulage services is expected to continue growing for the foreseeable future.

The RSA priority is to maximise the safety of all road users and to have a regime in place which ensures that all vehicles used on Irish roads are of the highest standard and are fit for purpose and used safely and that the compliance and enforcement strategy is effective. The RSA and other partner agencies have a critical role in ensuring that operators and drivers understand their obligations and they have a duty to comply. The majority of operators are broadly compliant and take their responsibilities seriously. Recognising that there may be different levels of non-compliance some which may arise ranging from unintentional error or misunderstanding to blatant evasion, the compliance and enforcement strategy to be applied must recognise the nature of the non-compliance and modify the compliance strategy to deal with these risks and compliance behaviours.

Most of the commercial vehicles registered in the State are used for purposes other than road haulage and are used by trades people, local councils, manufacturers etc. While the exact obligations on drivers and operators of commercial vehicles vary according to the use of the vehicle, six broad categories of obligation apply to all commercial vehicles viz:

- requirements regarding the registration and taxation of commercial vehicles,
- requirement for a driving licence in the appropriate class for the vehicle being drive,
- minimum standard of vehicle standards including roadworthiness,
- adherence to the road traffic acts while in use including matters relating to insurance, owner responsibilities, speed, drink and drugs, seat belt use etc.
- requirements relating to operator licensing to engage in hire and reward operations, where appropriate,

- EU requirements relating to tachograph, driving and resting times, driver CPC, vehicle standards.

If an owner or driver of a commercial vehicle fails to meet the applicable requirements, then they may be considered to be non-compliant.

There is a strong link between road safety and climate change not just in terms of mitigation of and adaptation to climate but also in respect of policies and practices related to safer roads (such as speed management) resulting in reduced CO₂ and other harmful emissions.

4.1 What are the road safety priorities in road haulage for the next 10 years?

The road safety priorities for the road haulage sector as well as the wider commercial vehicle sector are included in an integrated plan contained in the Road Safety Strategy 2021 – 30 based on the ‘Safe System’ approach to road safety.

As regards the road haulage sector, the major road safety priorities for the road haulage sector to be addressed over the next 10 years are:

Continuing existing measures

- improving compliance with existing rules and particularly the EU driving and resting time rules – the purpose of these rules is to address driver fatigue;
- enforcement of driver licensing requirements – ensuring that drivers are equipped with the skills to drive commercial vehicles safely;
- target led approach towards enforcement;
- enforcement of the Road Traffic Acts specifically as regards speeding, distracted driving, seat belts, drink and drug driving and in the case of commercial vehicles overloaded vehicles;
- encouraging owners to make more informed and better choices about new vehicles and the benefits of safety technologies; and
- responding effectively to changes in the operating landscape in terms of risk management, new EU requirements and national policy requirements.

Other proposed measures that may need to be considered within the context of the road haulage strategy which have a road safety influence include:

- management practices that promote safety and environmental benefits including use of telemetry, incentivise company remote driver monitoring, eco-driving and vehicle maintenance, reducing traffic movements by addressing load inefficiency issues, establishing smart freight centres,
- Addressing driver shortage, which is estimated at 10.7% in Ireland. Increasing shortage of drivers puts increasing pressure on road safety,
- Work with industry to examine impediments to fleet renewal, examine business models, supply chain practices and resulting difficulty to commit to fleet replenishment, eg short

term contracts, lack of viable financing options for commercial vehicles versus private individuals, as compared with other countries, examine used import market and its impact on the quality of fleet,

- Improving roadworthiness standards particularly amongst the light commercial vehicle cohort and older commercial vehicles and minimising in line with Safe System principles, fatalities and collisions as a consequence of poorly maintained vehicles,
- All measures to be tailored for small fleet size seen in Ireland,
- Funding and investment in urban distribution centres to reduce volumes of HGVs in large urban areas,
- Transition to new forms of transport, such as truck platooning and automation while staying on the envisaged trajectory of Vision Zero.

The new Road Safety Strategy contains a number of general and specific road safety measures to be applied in respect of the road haulage industry which include

- a. embedding Safe System principles and practices into operator practices and bringing into line with the Government's Road Safety Strategy 2021 -30;
- b. metrics in respect of enforcement;
- c. enhancing the safety of the national commercial vehicle fleet including continuous improvement of the CVRT test regime;
- d. leveraging technology, data and innovation to improve the safety of the vehicle, driver and infrastructure in collaboration with other key government and agency partners; and
- e. enhancing the efficiency and effectiveness of enforcement and minimise inconvenience for compliant operators.

There is a dearth of information on road transport activity and performance particularly as regards short trips, light vehicles, vehicle/volumetric utilisation, requirements and constraints in the industry and the potential for modal shift including possibilities for electric vehicles and other types of 'clean' and low speed vehicles in urban centres as well as possibilities for road haulage vehicles being prioritised in special vehicle lanes particularly at the ports.

In the context of the implementation of the Safe System approach, the compliance strategy should assess the underlying factors of non-compliance rather than just treating the symptoms and the factors influencing some deviant road safety behaviours in the road haulage sector. A better understanding of a systemic problem, if such exists, causing or contributing to non-compliant behaviour may yield a better long term outcome for example working with third parties such as freight terminals to minimise delays for commercial vehicle drivers at depots or engaging with the construction and other industries about over-loaded vehicles and cargo securing.

Consideration might also be given to strengthening consignor liability provisions including chain of responsibility provisions being applied to loaders, shippers, freight forwarders, consignors etc. and the application of swifter penalties. Effective and swift sanctions must be a key part of the enforcement regime and applicable to all levels of governance from the shipper through to the driver/operator.

4.1 What are the road safety priorities in road haulage for the next 10 years?

RSA recommendations:

- I. The proposals put forward in this part of the consultation are recommended for consideration in the context of the proposed road haulage strategy.
- II. Road safety must be the key principle underpinning the proposed road haulage strategy optimising outcomes for the economy and the road haulage industry and the measures contained in the Road Safety Strategy 2021 – 2030 fully implemented.
- III. The proposed road haulage strategy must be fully aligned and support the Road Safety Strategy.
- IV. An analysis of current data sources being collected in respect of HGV and LCV vehicles and activity including traffic count, safety, routing, HGV vehicle utilisation, cabotage, light vehicle use is an essential pre-requisite for proper planning, to inform decision making, increase efficiency and improve network management including road safety.
- V. Greater involvement by the haulage industry in the development of road safety measures and leveraging their support, where possible, may facilitate implementation.
- VI. Identification of systemic issues involving third parties in the supply chain causing or contributing to non-compliance by operators and drivers in the road haulage sector may inform new policy approaches towards improving operator compliance.
- VII. The benefits of chain of responsibility legislation should be explored making sure that all in the supply chain share responsibility for ensuring compliance with road safety requirements and that breaches of road safety requirements do not occur.
- VIII. New technological developments including transitioning to new forms of transport such as truck platooning and automation while staying on the envisaged trajectory of Vision Zero needs to be planned so that the benefits from a road safety perspective are realised at the earliest possible date.

4.2 How are these priorities best addressed?

The road safety priorities identified in the preceding response can best be addressed through the application of a Safe System approach to transport planning, priorities and implementation in respect of work-related road safety management at official level and at operator level.

From the RSA perspective, compliance is most likely to be optimised when there are a range of policy approaches available such as advisory/education/persuasive option, engagement with industry combined with a stepped enforcement regime involving directions, prosecutions, licence withdrawal/suspension and vehicle immobilisation options as well as loss of driver's licence/penalty points for more serious offending of the driving and resting time rules as contemplated by EU Regulation 561/2006.

Having regard to the new Road Safety Strategy and the application of a 'Safe System' approach, priority actions to address compliance include:

- operator and driver communications and application of the Safe System approach specifically in respect of the management of road safety at operator level;
- greater enforcement coordination and leveraging the limited resources available for enforcement with other partners;
- better network planning, address pinch-points impeding road freight movements, congestion and identifying road safety improvements including the provision of additional and safe resting and enforcement areas;
- better collaboration with the industry and promotion of specific road haulage safety measures;
- working and supporting the industry to raise driving standards;
- Support for high levels of safety, recognition of compliance including the possible adoption of an 'earned recognition' scheme and concentrated focus on non-compliant operators;
- Better data including research on the causal factors resulting in HGV collisions, gaining insights into strategic matters affecting the industry; and
- Changes in legislation to address legal deficits and consolidation of road transport related legislation.

The specific activities to be applied by RSA over the first 3 years of the Road Safety Strategy in respect of the road haulage sector will include the following:

1. enforcement of drivers hours and tachographs and roadworthiness enforcement;
2. exploit existing and proven arrangements for raising compliance;
3. reviewing testing methods within the CVRT and implementing innovations to support the quality of testing;
4. Promotional measures designed to enhance roadworthiness standards, encourage better selection of safer vehicles, adherence to driving and resting time rules, encouraging operators to undertake additional training;
5. Enhancing collaboration with the Garda Síochána in respect of risk based enforcement and providing An Garda Síochána with access to the RSA risk system;
6. resolving legal deficits impeding enforcement in respect of powers, sanctions etc as well as exploration of automated enforcement options;
7. increasing RSA enforcement capacity through recruitment and upskilling existing staff;
8. researching particular road safety innovations for HGV including HGV vehicle platooning to reduce greenhouse gas emissions and opportunity to enhance road safety.

The RSA enforcement activities are largely driven by EU obligations in respect of driver's hours and tachograph and roadworthiness compliance. The level of enforcement activity by RSA is driven by the availability of resources, Garda availability and decisions made around

how best to deploy the limited resources that are available to achieve the best compliance. There is no opportunity for any engagement by the key stakeholders into the overall strategic approach being applied. Obtaining the support and cooperation of the key stakeholders may be useful in leveraging improved compliance behaviours. Not only would this enhance the stakeholder's credibility, but it would also promote better understanding and trust.

Commercial vehicle developments.

Other factors that will influence and support compliance concern the availability and use of new in-vehicle technologies. Leading truck manufacturers have been making an important contribution to road safety by continuing to invest in latest technologies, such as direct vision. Safety technologies will become prevalent across a wider range of vehicles only when road haulage industry demands this. Incentives and domestic policy such as new requirements around tendering specifications for public works contracts can help drive better standards in fleet design.

As regards the national vehicle fleet, there are concerns that the existing age profile of the heavy commercial fleet in the State is increasing and operators may be postponing decisions on the modernising their fleet particularly against the backdrop of anticipated changes arising from decarbonisation. Analysis is needed regarding fleet age of Ireland versus other Member States, and the root causes of the aging fleet must be identified. Measures to address this issue will depend on the root cause and this should form part of the 10-year strategy.

The safety of commercial vehicles can be continuously ensured through driver training, road safety regulations, properly maintained vehicles, operator maintenance and the use of on-board safety systems. Telematics can also play a part and are particularly attractive due to the ease of retrofitting. Truck platooning shows promise and the use of cooperative adaptive cruise control may increase carbon efficiencies and road safety. Increasing automation is also likely to be an influential factor in bringing about change in the commercial vehicle sector although it is not expected that these developments will have a significant contribution to make over the next 10-year period.

Institutional aspects:

A commonly held view among some operators in the hire and reward sector is that there is a difference in approach being applied by RSA and the Department between 'own account' operators and those who are licensed for road haulage activities. This is consistent with the perspective that all commercial vehicles should be treated equally and that own account operators should be obliged to meet the same standards in respect of good repute, financial standing, and professional competency as what applies to the hire and reward sector. While the requirement for own account operators to be licensed is not an EU legal requirement, there may be merit in reviewing the benefits of licensing own account operators from the perspective of enhancing standards in the commercial vehicle industry.

The existing institutional arrangements dealing with the regulation of the commercial vehicle sector in the State which includes road haulage is not dissimilar as to what applies in other Member States. It is noted that the UK has adopted a Traffic Commissioner model to regulate the road transport industry and the own-account sector. Their function is to ensure that only safe and reliable operators of goods and passenger vehicles are permitted to be licensed. Traffic Commissioners may take regulatory action against an operator - where they may revoke, suspend, or curtail an operator's licence. The merits of applying a Traffic Commissioner approach in Ireland may be worthy of some examination by the Department of Transport.

4.2 How are these priorities best addressed?

RSA recommendations:

- I. Road safety priorities for the road haulage sector can best be addressed through the application of a Safe System approach to transport planning, priorities and implementation of a work-related road safety management system as envisaged in the Safe System approach contained in the Road Safety Strategy – the most effective approaches will be multi-faceted and systemic.
- II. Optimising compliance in the haulage sector requires updates to existing enforcement powers and facilities and sanctioning regimes and bringing the State into line with other Member States e.g., immobilisation of vehicles for cabotage, operator licensing offences, fixed charges together with complementary powers including provisions around information exchange between agencies that have a vested interest in road safety.
- III. Compliance measures must be implemented by means of a stepped response to behaviours by making it easy for those who want to comply and implementation of a credible and swift enforcement response to those who for their own reasons decide not to comply.
- IV. The current strategy of encouraging voluntary compliance should continue and formalised if possible, through the adoption of an ‘earned recognition’ or other assurance scheme for HGV operators to further incentivise compliance.
- V. There should be engagement by the RSA and the Department with the road haulage industry about the design of the compliance and enforcement strategy to be implemented in respect of the road haulage sector.
- VI. A consistent and authoritative approach to governing the road haulage industry should be an important guiding principle for the proposed haulage strategy.

4.3 What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?

The main trade associations for the haulage sector are the Freight Transport Association of Ireland (FTAI) and the Irish Road Haulage Association (IRHA). Although there are large numbers of HGV operators who are not members of either association, RSA understands that the IRHA represents the bulk of the licensed road hauliers in the national fleet. Often, companies are members of both associations. There is no known equivalent trade association for the light commercial vehicle sector. The FTAI promotes van safety as part of their service offering.

The RSA maintains a professional and cordial relationship with individual HGV operators and their drivers and this is reciprocated. RSA enforcement goal is to correct operator and driver behaviours to ensure compliance with specific road safety requirements relating to roadworthiness, drivers hours and tachographs, working time, operator licensing and driver CPC. In the context of Vision Zero, while some operators and drivers meet and exceed the minimal requirements, the industry as a whole needs to move beyond baseline compliance and to conduct operations in a manner that prioritises road safety at all times. This is one of the challenges facing the industry over the next decade.



The RSA responds to non-compliance by reference to the degree of offending. Minor infringements or the scale of offending that does not present a road safety hazard would involve an educational and advisory approach being applied. Other more serious offending would involve direction notices and the possibility of Court proceedings. Such proceedings are initiated through the District Court system and dealt with as summary offences: while there are some provisions which allow proceedings to be taken as indictable offences, there has not been any cases on indictment as this is generally reserved for more serious offending such as murder, child trafficking etc.

Operators have clear obligations in respect of the matters enforceable by RSA.

RSA engagement with the Haulage Representative Associations concerning the Department’s consultation.

RSA engaged with each of the Associations to get an insight into their thinking on the Department’s consultation issues affecting the industry and specifically as regards the topics coming within the ambit of the RSA.

Specific issues of concern to the Irish Road Haulage Association

Themes	IRHA PERSPECTIVE
Roads policing	<ul style="list-style-type: none"> • Absence of ‘<i>proportionality</i>’ by RSA in respect of enforcement: RSA is not sufficiently tackling non-State offenders in respect of alleged cabotage and other offences; • Perceived heavy handed approach by RSA towards licensed hauliers and more lenient approach towards own-account operators; • Vehicle defects assessment at the roadside was overly severe and does not take account of road safety risks; • Court penalties against out of State offenders were derisory and contrasts with the experience of Irish operators subject to enforcement penalties in other jurisdictions; • RSA has not cultivated the licensed haulage operators over the years and the Authority has a negative perception of the industry.
Government related matters	<ul style="list-style-type: none"> • Concerns arise about ‘phoenix’ companies being granted operator licences; • Greening of the industry –financial supports/incentives necessary to help with shift to Euro 6 vehicles which are much more expensive; • Gas powered vehicles are not an option, particularly for international journeys due to difficulties in refuelling them; • The uptake of alternatively fuelled vehicles is likely to be very slow by the road haulage industry and Government support needed to defray the extra costs of same, fuelling investments etc. • Brexit planning lacked coordination at Government Departmental level resulting in delays, extra costs and frustration for those engaged on international road haulage activities; • A more streamlined and quicker approach for processing work permits for non-EU HGV drivers is necessary; • Reducing the age that applicants can qualify for Class C licence was seen as one way of ameliorating driver shortages.



<p>Regulation</p>	<ul style="list-style-type: none"> • Road haulage industry is over-regulated; • CPC training is not relevant, effective or available online - it needs to be reformed and be more meaningful particularly for those who will be completing their second cycle of training; • Driver CPC exchanges between UK/NI and Ireland need to be facilitated, deadlines extended and a common-sense approach put in place for a period to minimise inconvenience for Irish operators seeking to employ UK/NI drivers against the backdrop of driver shortages.
<p>RSA interactions with the industry</p>	<ul style="list-style-type: none"> • While IRHA appreciates the role of the Authority, there is a perception that the RSA is alienating reputable HGV operators and the industry generally because of the approach implemented to the CVRT, roadside inspections, the RSA risk system and the Driver CPC course: reform was necessary; • Issues quoted included the following: <ul style="list-style-type: none"> ○ alleged inappropriate classification of defects by RSA inspectors at roadside checks and within the CVRT system resulting in major/dangerous classifications being applied; ○ absence of an independent appeals system relating to the classification of defects; ○ some operators were upset that they did not qualify for a 'Green' rating on the RSA risk system and had not received any explanation or apology from RSA in respect of their assigned rating. ○ The algorithm for computing risk rating for operators needs to be altered – the Association have been engaging with the IRU about operator risk rating; and ○ RSA interactions with drivers were perceived to be threatening. • IRHA perceive that the classification of defects at roadside inspections and at the annual test is too severe. When there was a dispute about a defect, the matter of dispute should not be counted in the algorithm used in the RSA risk system until the dispute was resolved; • CVRT emissions testing is 'basic' – vehicles can pass the CVRT test even if the 'Ad-blue' system has been switched off. Furthermore, inspections at the roadside did not check the ad-blue system.

Many of the points raised by the IRHA repeated commentary contained in their submission to the Public Accounts Committee in July 2019. The RSA comprehensively addressed these issues in a submission to the PAC at the time. It is clear that the Association believes that its perspectives have not been taken on board to the degree that they would wish. It would not be appropriate to exaggerate the difference between RSA and the IRHA values in terms of road safety: in responding to these demands, it must be noted that the categorisation of defects detected during the course of inspections including those at the roadside as well as the CVRT, the Driver CPC and risk rating are matters specified by EU law and as such the



Authority is implementing the requirements in accordance with those rules. The Authority welcomes the commitment of the IRHA to road safety.

It is inevitable to have a tension in the relationship between an enforcement agency and those being regulated. RSA is continuously monitoring the compliance and enforcement approach being applied to ensure that it is in conformity with international practice notwithstanding the known deficits in the tool-kit. An enforcement strategy based solely on deterrence would antagonise those operators willing to comply, as well as risk a sub-culture of regulatory resistance if the focus of on punishment/sanction is unfair. On the other hand, the adoption of a purely advisory strategy would embolden wayward operators who for their own reasons choose not to comply. Furthermore the RSA would have a concern that as operators perceive enforcement to be lax, this could have a discouraging effect on the compliant operators. Therefore the compliance strategy needs to involve a combination of deterrence and advisory/educational measures and to be constantly reviewed.

Specific issues raised by the FTAI concern the following

Themes	FTAI perspective
Road Policing	<ul style="list-style-type: none"> Concerns about lack of enforcement, inadequate and dissuasive sanctions and inadequate enforcement toolkit; RSA resources for enforcement were limited and need to be augmented; Compliant operators are being undermined; the implementation of the risk system was a missed opportunity as RSA was not able to adequately focus on non-compliant operators; Non-compliant operators were not being pursued; AGS and RSA need to target drivers coming off the ferries; There were concerns around excessive daily driving and drivers using two or more driver cards to hide excessive driving – RSA and AGS need a bigger presence at the roadside; Absence of fixed charge system was perceived as a significant deficit in the enforcement toolkit; AGS resources and capability for commercial vehicle enforcement needs to be strengthened.
Government related matters	<ul style="list-style-type: none"> Decarbonising the HGV fleet must be properly planned, taking into account availability of options e.g, sufficient fuelling/electric options being available and the need for a transitioning plan; Concerns about rising carbon tax – perceived absence of coordination in respect of government policy for example there was carbon savings to be obtained from application of eco-driving techniques. Govt financial support was needed; There were opportunities to learn lessons from other jurisdictions in terms of reducing the carbon footprint; National emergency planning group needs to engage with HGV industry about emergency planning in respect of exceptional events such as severe weather, future pandemic; Consignor liability provisions need to be strengthened.
Regulation	<ul style="list-style-type: none"> The Association support strong regulation which promotes a level playing field but there were concerns raised about enforcement capacity and resources.
RSA interactions	<ul style="list-style-type: none"> Good working relationship in place and the FTAI strongly supported RSA in promoting road safety across all modes;

with the industry

- FTAI believed that there would be merit in having a central coordinating person within RSA liaising with the industry on an on-going basis going forward.

RSA engagement strategy

The Authority seeks to meaningfully engage with the key stakeholders who are impacted by its work in respect of our services and related activities: the COVID-19 pandemic has created both obstacles to and opportunities for engagement. Virtual meetings have offered the opportunity for the Road Safety Authority to reach out to both Associations in a relatively informal but nonetheless effective way while in person meetings have ceased.

Meetings are generally organised on an ad hoc basis and generally are of a specific nature. The RSA has participated at events organised by the Freight Transport Association of Ireland relating to Transport Managers and roadworthiness issues. Other events which the Authority has participated include the driving for work seminars, public consultation on the CVRT strategic review which was open to operators to present their views about the CVRT testing system. In addition the haulage representative associations were also consulted for views on a review of the RSA risk system.

Increasing transparency with stakeholders

While the RSA has applied a transparent approach in respect of its engagement with both of the representative associations, the Authority believes that there are further measures that can be taken in this regard. Specifically, the Authority will publish summary accounts or minutes of meetings on its website.

Outside of this, the Authority proposes to review the establishment of a forum to allow both the IRHA and FTAI to engage with each other and the RSA and other agencies such as the AGS, HSA et al concerning the oversight and enforcement of road haulage matters in the State subject to the agencies being prepared to participate in this proposed arrangement. To that end, the RSA would be agreeable to hosting a Road Haulage Conference to enable the stakeholders to raise strategic issues relating to how road transport regulation and how the broader road haulage system operates, policy development and wider strategic issues affecting the road haulage industry particularly focusing on the areas concerned with enforcement, commercial vehicle testing, health and safety, training and vehicle technologies. This conference would raise the profile of institutional engagement with the road haulage industry and enhance the interactions taking place between the RSA and the stakeholders affected and provide opportunities for other agencies to strengthen engagement with the industry recognising the pivotal importance of the road haulage sector to the national economy.

The RSA would also welcome a constructive working relationship with the Irish Road Haulage Association going forward which in the past has been strong and mutually beneficial. We seek restoration and adherence to having the practice of quarterly meetings to discuss issues and matters of concern and affording each party to understand each other's perspective, fostering mutual respect and trust, clear understanding of roles and responsibilities and realistic expectations taking into account factors that apply to the adoption and enforcement of EU and national legal requirements, non-discrimination and the existing tool-kit available to the RSA for the purposes of enforcement. This process must not be a 'once off' activity and needs to be cultivated to enhance working relationships going forward and without any preconditions.

Improving cooperation and communication with the haulage industry

The Authority is putting forward the following suggestions to address and maintain and improve stakeholder between enforcement agencies and the road haulage sector:

1. Exploring options for models for engagement/structures in place in several jurisdictions across the EU with a view to ensuring that any proposals in this area to be applied in an Irish setting is based on best practice in how agencies dealing with road haulage in those countries engage with their domestic stakeholders;
2. Publish additional guidance for operators concerning criteria applied in respect of reasons for failure of test items having regard to EU requirements on test methods, and assessment of deficiencies;
3. Share information with the representative associations around enforcement activity in respect of particular sectors and annual plans;
4. Publish annual material concerning inspections of non-State operators including prosecutions;
5. Proactively engage with the IRHA and FTAI concerning revisions planned by the European Commission to the algorithm for risk rating;
6. Explore the arrangements applied by other Member States concerning the delivery of Driver CPC training and what lessons could be applied in an Irish setting while fully respecting EU Directive requirements in respect of methods of delivery and content;
7. Clarify the minimal information requirements necessary to enable an investigation to be initiated when a complaint about an operator is being made; and
8. Update the key road haulage representative associations of progress associated with the delivery of the road haulage elements of the new Road Safety Strategy 2021 – 30.

4.3 What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?

RSA recommendations:

- I. The proposals put forward in this part of the consultation are recommended for consideration in the context of the proposed road haulage strategy.
- II. RSA and the key road haulage associations should restore the practice of having quarterly meetings to discuss issues and matters of concern and affording each party to understand each other's perspectives, fostering mutual respect and trust, clear understanding of roles and responsibilities and realistic expectations.
- III. Minutes of meetings/ summary accounts of meetings should be published by RSA.
- IV. RSA to review the establishment of a forum to allow both of the main representative associations to engage with each other and the RSA and other agencies to review strategic issues including the possibility of a Road Haulage Road Safety Conference.
- V. A review should be undertaken to identify best practice models for engagement/structures put in place in other jurisdictions concerning road haulage matters and how this could be applied in an Irish setting.
- VI. Additional guidance be published for operators on making complaints about alleged illegal haulage activities and RSA requirements concerning investigation.
- VII. RSA enforcement plans be shared with the haulage associations annually including information on inspections of out of State operators.
- VIII. RSA to proactively engage with the road haulage associations about the European Commission rules on the algorithm for risk rating.
- IX. Explore the arrangements applied in other Member States concerning the Driver CPC course and what lessons could be applied in an Irish setting while fully respecting EU Directive requirements in respect of delivery methods and content.
- X. Keep the haulage associations informed of progress relating to the delivery of the commercial vehicle elements of the new Road Safety Strategy Transformation Programme.
- XI. Publish information on the numbers of non-State operators inspected and legal proceedings being taken for alleged offences.



4.4 What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?

To effectively position operators to comply with road safety obligations and to reduce regulatory burden requires the application of an integrated system-wide approach to road safety regulation, compliance and enforcement applied on risk basis and intelligence led and sustained buy-in from all involved operators.

Enforcement in combination with advisory/educational and awareness measures is the single most important ingredient in achieving compliance. Other complementary measures such as the application of automated enforcement in the context of HGV enforcement/new vehicle technologies as well as ITS solutions have limited application at this point in time, but their role is likely to increase over time. Institutional capacity as well as interagency collaboration on enforcement are also important ingredients to bring about a culture of compliance in respect of road safety.

From the road traffic and road transport compliance perspective, while components of the framework necessary to support compliance are already in place and include legislation, simplified guidance material concerning requirements, rules of the road, enforcement etc, there are deficits in the system. From the HGV enforcement perspective, the Road Safety Authority has implemented a number of initiatives focused on the HGV sector as follows:

Promoting compliance	<ul style="list-style-type: none"> • Publication of information resources and best practice guidelines; • Participation in seminars, conference, events and media; • Provision of advice and workshops including attendance at large outdoor events such as the Ploughing Championships and Tullamore Show; • Stakeholder engagement and maintaining good relations; • Harmonised interpretation of rules including application of guidance from European Commission; • Staff training and skills development; • Consistent enforcement practice as well as processing of applications for digital tachograph cards.
Monitoring compliance	<ul style="list-style-type: none"> • Verification that compliance is being achieved; • Inspections – roadside and premises; • Data analysis and performance indicators; • Dealing with complaints.
Responding to non compliance - enforcement	<ul style="list-style-type: none"> • Risk based enforcement; • Seeking corrective action; • Applying available tool-kit – depending on the degree and severity of offending, targeting and on-going monitoring; • Initiation of legal proceedings; • Engagement with the DOT on operator compliance/good repute assessments; • Training and upskilling of enforcement personnel; • Application of a consistent approach to enforcement; • Application of public service values – fairness, impartiality, appropriate use of powers.



Other RSA activities supporting the road haulage sector and commercial vehicle sector	<ul style="list-style-type: none"> • Publication of rules of the roads; • CVRT guidance material; • Driver licensing publications; • Road Safety education and advisory measures; • Driver CPC; • Digital Tachograph administration.
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Recommended practices to help operators achieve compliance with road safety regulations include the following:

Theme	Recommended practices
Compliance promotion	<ul style="list-style-type: none"> • Accessible information concerning legal requirements to be complied with using plain English and available through several channels; • Providing operators, drivers, and the public generally with access to the various legal texts; • Keeping legislation as simple as possible ; • Availability of subject matter experts to respond effectively to operator requests for technical assistance; • Engagement with representative associations; • Clear obligations and consequences of non-compliance is widely understood; • Suitable and secure parking areas to accommodate larger vehicles with appropriate facilities for drivers; • Incentives.
Effective Enforcement	<ul style="list-style-type: none"> • Sustained and high visibility enforcement; • Risk based and proportional – frequency of inspections is determined by risk status although there will always be an element of random inspections and consistently applied; • Dissuasive sanctions – financial and operational; • Long-term and institutional commitment including collaboration with other agencies where cooperation is mutually beneficial and there is a vested interest in road safety; • Governance measures in place to ensure coherent and harmonised enforcement practices applying standard public service standards in respect of honesty, integrity, professionalism, impartiality, transparency and accountability; • Data analysis informs enforcement priorities; • Sufficient powers for enforcement personnel to carry-out their roles efficiently and effectively balanced with fair processes and procedures to protect against inappropriate application of powers; • Clear appeals process in place; • Effective enforcement toolkit to be able to address issues arising; • Effective sanctions, closure of loopholes, addressing enforcement deficits, joined up approach between enforcement and DOT in responding to non-compliance or evidence of non-compliance that raises concerns about the competency of the Transport Manager; • Swift sanctions and clear consequences for illegal activity.
Maintaining institutional capacity	<ul style="list-style-type: none"> • Comprehensive understanding of enforcement and requirements; • Streamlined processes; • Service delivery standards – general principles such as impartiality, data protection, complaint management processes and courtesy;

	<ul style="list-style-type: none"> • Simplification of procedures, reduction in formalities, avoidance of duplication, avoidance of 'gold-plated' legislations, principles-based regulations, simple communications.
Interagency collaboration	<ul style="list-style-type: none"> • Ability to share enforcement related information with other enforcement agencies; • Managing GDPR considerations as applicable to enforcement; • Data management and exchange; • Upskilling and sharing best practice and experience.
Vehicle Technology	<ul style="list-style-type: none"> • Promotion of benefits of safer vehicles; • Promotion of newer and safety vehicles through public procurements; and • Incentives for operators migrating to EURO 6 fleet.

Much of the practices recommended above are already in place but there are some deficits in the enforcement toolkit. A core principle of enforcement is swift and effective sanctions that create deterrence and also promote compliance. To assess the effectiveness of enforcement is challenging because of the many factors that influence compliance. From an operational effectiveness perspective, the RSA believes that (i) swift sanctions and (ii) deficits in the enforcement toolkit should be prioritised particularly as regards enforcement information exchanges and vehicle prohibition/detention measures be available to address infringements of operator licensing and cabotage rules over the next 2/3 years and be guided by an ambitious timeline.

In tandem with above, operator capacity also needs to be enhanced. Possible options in this regard include

- Inspections at operator premises to enable new applicants for operator licences to demonstrate evidence of capacity to comply with: -
 - Drivers hours and tachograph rules.
 - Vehicle maintenance requirements.
 - Driver instructions/handbook.
 - Evidence of driver CPC conformity when seeking an operator's licence.
 - Document management.
- Annual CPD courses for Transport Managers.

Deficits in the compliance tool-kit available to RSA

Deficits in enforcement toolkit restrict the ability of agencies to function in an integrated way which is essential within a system led approach: the concern is that these deficits undermine efforts to increase deterrence, promote compliance and potentially restrict options for new initiatives and better coordination.

These deficits include the following:

- Information and data exchange capacity by RSA between potential partner agencies.
- Inefficient sanctioning regime for offenders including absence of fixed charge system.

- Insufficient powers to deal with certain offences such as cabotage and operator licensing.
- Insufficient manpower resources and infrastructure such as dedicated enforcement sites for commercial vehicle enforcement.

While RSA and the Garda Síochána have a range of inspection powers for the purposes of their duties, the toolkit available to deal with non-compliance at the roadside is for the most part confined to taking a prosecution. The over-reliance on one sanction option i.e. Court proceedings, is the main weakness of the current regime and puts Ireland out of step with modern approaches to the enforcement of transport rules and regulations. Current best practice thinking is that regulators and enforcement Agencies should have at their disposal a menu of sanction options that give them the flexibility to penalise non-compliances in ways that reflect the nature of the offence and the circumstances of the offender.

Much of the overhaul of the regulatory systems across the EU in the past decade has been driven by the need to improve the efficiency of enforcement and sanctions. This has led to the implementation of systems of Fixed Charges to deal promptly with offences rather than pursue them through the Courts.

The argument for transitioning to a system of Fixed Charges for sanctioning of road transport offences - traditionally seen as being in the domain of the Courts - is based largely on the potential administrative, operational and financial savings for enforcement authorities and the Courts system. There is also the added attraction for offenders that Fixed Charges offer a quicker, less expensive and simpler process where the payment of a Fixed Charge addresses an offence with no record of conviction, despite the implied admission of culpability. Taking proceedings through the Courts results in delays in the initiation and processing of a particular cases which

- Disconnect enforcement from the offence.
- Potentially delays early achievement of compliance objectives.

Delays may be caused by several factors, including the time it takes to collate and prepare evidence and serve summonses, backlogs and adjournments of Court cases.

International research strongly indicates that punishment is most effective when non-compliant behaviour is punished at the time or near the time it occurs. The more immediately a sanction is applied, the greater its deterrent effect.

Other weaknesses in the toolkit include:

- insufficient powers to deal with those committing operator licensing and cabotage offences. As things stand, operators breaching these rules are allowed to proceed with journeys after detection thus allowing the offence to continue which removes any deterrent effect enforcement has on them in respect of these offences.
- Legal provisions are inadequate to facilitate exchanges of information between enforcement Agencies regarding non-compliant operators, particularly those identified as serially non-compliant, which should be a concern from a road safety perspective.
- Drivers' licences are not being suspended, withdrawn or restricted in cases where there are infringements of the drivers' hours and resting time regulations of a kind that are clearly likely to endanger road safety: such restrictions on driver licences is foreseen by EU Regulation 561/2006 dealing with driving and resting time rules.

The RSA is using existing Court-based processes to summon non-resident operators to answer charges in the District Court in respect of cabotage related offences. The District Courts have convicted cases where there were breaches of the Community licencing rules by non-resident operators. However, it is possible that non-resident offenders will evade enforcement action by simply ignoring proceedings in respect of offences detected when operating within the State.

An area of particular concern to the RSA and which has been raised by the road haulage associations concerns those operators who (i) have '*flagged out*' part of their operation to another Member State but continue to operate as if they were based in the State and (ii) RSA/AGS capacity to enforce rules against this cohort of operators.

The RSA has observed that some operators have flagged out part of their operations to other Member States which involves the establishment of a foreign subsidiary and the registration of some of their fleet abroad. While the Authority is not aware of the specific motivation for doing so, it may be for purposes relating to cost reduction and exploiting cost differences between Member States. The RSA has concerns that some of those who have flagged out continue to operate in the State as if they are actually resident in the State and breach cabotage rules either by design or absence of understanding of the rules. The Mobility Package does contain additional requirements for monitoring flagged out companies including the existence of an effective and stable establishment in the host country, however the effectiveness and timeliness of measures taken by a host State when assistance is sought will depend on resources and commitment which may not be forthcoming as quickly as the RSA would wish.

Reducing the regulatory burden on smaller operators

RSA has and is implementing a range of different initiatives designed to reducing the regulatory burden on operators in respect of the areas coming with the ambit of the Authority. The scope of the initiatives in this regard cover:

- a. simplified/streamlined processes and applying business/customer centric approaches – e.g. central issuance of certificates of roadworthiness rather than requiring vehicle owners present pass statements following tests at Motor Tax Offices to obtain the Certificate of Roadworthiness,
- b. centralised process for permits for abnormal loads.
- c. Applying a more tailored approach/less burdensome intervention in respect of operators e.g. remote enforcement applied involving desk-based assessments.
- d. Leveraging technology as much as possible – on-line options for digital tachograph cards, blended learning for Driver CPC., ADR tests, CVRT tests.
- e. Simplified guidance material for drivers and operators in respect of obligations.
- f. Administration/application fees not increased.
- g. Quality approach in respect of inspections and not being overly prescriptive in respect of achievement of compliance from the administrative perspective – operators have flexibly around how they comply based on sound decisions and advice from RSA.

Most if not all the costs that operators and drivers incur in respect of RSA services should for the most part be obtained without the need for any external professional assistance by the entities concerned. All of the compliance requirements applicable to the operation of a haulage

business coming within the scope of the RSA are associated with legal obligations and are part of the normal costs payable by the public generally to comply with a legal requirement or obtain a legal entitlement. RSA ensures that costs of compliance and regulations are applied flexibly by ensuring that enforcement officers are adequately trained and there are sound decisions having regard to the particular issues found during an inspection.

One potential area of RSA activities that offers opportunity for reducing the burden or facilitating cost avoidance on vehicle owners is the costs that may be incurred with Court representation where an operator/driver was the subject of legal proceedings for breaching the tachograph and driver's hours rules initiated by the RSA. In the event that there was a fixed charge system for such offences and an operator was prepared to accept same, this would provide an opportunity for cost avoidance in terms of legal representation costs but also the cost and inconvenience at attendance at Court. Larger firms would typically absorb fines into the cost of doing business while owner-operators might struggle to defray these costs particularly taking into account the tight margins in the HGV industry. The adoption of a fixed charge scheme for road transport related offences is one of the Action Points contained in the Government's Road Safety Strategy.

4.4 What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?

RSA recommendations:

- I. The proposed road haulage strategy should acknowledge the importance of enforcement and that the enforcement approach to be applied conforms with recommended best practice and the State affirms its commitment to this approach.
- II. While acknowledging that many operators have good road safety practices, positioning operators and drivers to comply with road safety obligations and to reduce the regulatory burden requires the application of an integrated system-wide approach to road safety regulation, compliance and enforcement and sustained buy-in from all operators.
- III. The current enforcement approach which promotes voluntary compliance should continue including the application of an intelligence led and risk based enforcement.
- IV. Compliance promotion, effective enforcement, maintaining institutional capacity, promoting inter-agency collaboration as well as vehicle technologies must be part of the regime to help operators comply with road safety regulations and to reduce the regulatory burden for smaller operators.
- V. Operator capacity must be increased – inspections could be put in place to show that a new operator for an operator licence has the capacity to comply with key requirements such as the drivers hours rules, downloading tools for digital tachographs, Driver CPC conformity, document management etc. Consideration should also be given to obliging Transport Managers undertake annual CPD courses.
- VI. RSA should continue to make it as easy as possible for operators and drivers to meet and comply with their obligations through simplified processes, centralised and online application options for services, simplified guidance material etc,



- VII. Adoption of a fixed charge system for road transport offences would reduce costs and administrative burden for operators found to be breaching rules.
- VIII. The existing toolkit for enforcement needs to be strengthened.

4.5 Do you have any other comments on road safety matters?

The earlier content addresses the RSA points about road safety.

5. EU Road Transport Policy (Mobility Package)

Introduction

RSA priorities in respect of the EU Road Transport Mobility Package is that the Authority (and the Garda Síochána) has the capability and capacity to enforce those provisions which comes within its remit. New legal provisions are required to facilitate the enforcement of the rules contained in the Mobility Package.

The package is designed to ensure a balance between improved working conditions for drivers and the freedom to provide cross-border services for operators, and will also contribute to road safety. The new measures clarify certain requirements for operators and enforcers thereby assisting harmonised application across the EU.

5.1 What are your views on how Ireland implements the Mobility Package changes?

The EU Road Transport Mobility Package contains a number of requirements concerning the governance of commercial road transport. The Department's consultation document summarises the key elements of the package – the majority of which will come into effect from February 2022 although certain provisions relating to tachographs and drivers hours came into effect from 20 August 2020. These new rules contain requirements concerning the improvement of drivers' working conditions, notably rest times, posting rules for cross-border transport specifically in respect of cabotage, access to the market, stricter rules for establishing a transport company, and facilitate more efficient and consistent enforcement.

It is essential that there are effective provisions available to facilitate enforcement of these rules and that the objectives foreseen by the Mobility Package are achieved in the interests of better working conditions for drivers, better governance of operators and improved road safety.

Some 10 months after the adoption of the Mobility Package, there is no legal provisions yet in place to enable enforcement to be applied in respect of the EU rules.

From the RSA perspective, specific areas of concern arise from the enforcement of the Mobility Package as follows:

- 1) Impact of the Mobility Package in respect of the conduct of roadside enforcement resulting in increased complexity and potential delays;
- 2) Adequacy of existing enforcement toolkit to deal with breaches of rules and particularly those Irish operators which have flagged out part of their operations to other countries but continue to operate in the jurisdiction as if they were based in the State;
- 3) Application and enforcement of the posting of foreign drivers in the State rules;
- 4) Ability to share enforcement related information with other partner organisations; and
- 5) Adequacy of RSA staffing capacity to enforce the rules as well as provide coverage for those operators engaging on international services using light commercial vehicle from May 2022 in respect of operator licensing and tachograph enforcement from July 2026.

Impact of mobility package on conduct of enforcement.

The new requirements in the package regarding the driving and resting time rules will increase the complexity of the enforcement task during the course of roadside checks particularly as regards verification of weekly rest periods, the prohibition on taking such rest in the cabin, obligations in respect of returning to the operator's place of establishment and verifying compliance with compensation requirements.

Verifying compliance with the additional rules will cause delay and this will have a direct impact on the numbers of drivers that can be checked at the roadside: additional resourcing capacity will be required to ensure that enforcement activity is not scaled back as a consequence of the extra time needed for checks.

The inclusion of LCV vehicles within the scope of operator licensing from May 2022 and tachograph rules from July 2026 is also a further confounding factor as regards delays that will require additional staffing resources for enforcement. RSA enforcement resources are already woefully thin in terms of enforcement coverage and the current problems will be further exacerbated as a consequence of the new requirements contained in the EU Mobility Package. The enforcement task is becoming more complex, challenging and the demands are constantly increasing. RSA capacity is so limited that maintaining visible enforcement throughout the working day is not possible and a sizeable portion of the operations of commercial vehicles is taking place at a time when enforcement activity is unlikely to be taking place. Unless there are extra enforcement resources provided, it will be difficult for RSA to conduct meaningful enforcement of the EU Mobility Package measures apart from some token activity. Given the limitations on RSA capacity to enforce the regulatory responsibilities, there is a significant chance that the full benefits from the EU Mobility Package will not be achieved as there is greater scope for operators and drivers to evade their obligations.

The Authority will be required to publish and update existing guidance material for operators and drivers as well as undertake additional training to ensure a harmonised application of the rules. RSA anticipates that through its work on the various enforcement working groups such as CORTE and ECR, the enforcement approach applied by the Authority is consistent with that elsewhere. This engagement with the EU working groups and exchanges has required and will require a significant enforcement commitment by RSA.

Adequacy of existing enforcement toolkit to deal with breaches of rules and particularly those Irish operators which have flagged out part of their operations to other countries.

The toolkit available for enforcement of the tachograph, driver's hours and operator licensing is essentially the same that has applied since the mid-1980s and has not kept pace with the evolving changes in legislation or developments and risks in the road haulage industry. Earlier response to this consultation identified deficits in the enforcement toolkit and these deficits will also impair the effective and efficient enforcement of the Mobility Package.

Application and enforcement of the posting of foreign drivers in the State.

Directive No. 2020/1057 (the "2020 Directive") is also an important component of the EU Mobility Package. This Directive sets out specific measures concerning the posting of drivers engaged in international road transport operations. The RSA has furnished a detailed submission to the Department of Transport concerning the transposition of this Directive and proposals relating to the enforcement of the requirements and a decision is awaited on the role, if any, to be undertaken by RSA in respect of this Directive.

As regards enforceability of the Directive, RSA has identified the following issues:

- a. Avoidance of duplication of functions in respect of enforcement.
- b. RSA Enforcement tool-kit and sanctions.
- c. Compliance promotion.
- d. Data collection and analysis.
- e. Information exchange and co-ordination.
- f. Governance and strategic planning/changes required/legislation/bi-lateral matters.
- g. Appeals/complaints management.
- h. RSA resourcing.

Licensing of operators and application of tachograph requirements to vehicles which have a permissible laden mass exceeding 2,5 tonnes but not exceeding 3.5 tonnes engaging in hire and reward operations.

RSA understands that undertakings engaged in the occupation of road haulage operator by means of vehicles intended solely for the carriage of goods, involved in international transport and which have a permissible laden mass exceeding 2.5 tonnes but not exceeding 3.5 tonnes will be subject to operator licensing from May 2022. This cohort of operators will also be subject to the EU drivers hours rules from July 2026. While these regulatory initiatives will contribute towards road safety and fairer competition between operators within the international transport sector, operators using such vehicles for hire and reward operations solely within the State will continue to enjoy a competitive advantage over the licensed sector by virtue of being exempt from operator licensing, tachograph and driver CPC requirements. RSA is not aware of any data showing the numbers of light commercial vehicles engaging in hire and reward operations or the characteristics of this sector in terms of type of operations. However, there is anecdotal evidence to suggest that there are some practices in the light commercial sector where drivers/operators could be breaking the law in terms of overloading and excessive driving posing potential safety risks for themselves and other road users.

The implementation of the EU mobility package or the proposed new road haulage strategy may provide an opportune time for the Department to re-evaluate the merits of extending the operator licensing regime to operators using light commercial vehicles for hire and reward operations. Apart from operator licensing, consideration should also be given to the adequacy of the existing proscriptions on driving and resting times for self-employed professional drivers using light commercial vehicles for hire and reward purposes within the State.

Ability to share enforcement related information relating to the EU Mobility Package

The Road Safety Authority does not have an entitlement to make or enter agreements with other national agencies concerning information exchange relating to commercial vehicle operators, drivers or vehicles about enforcement matters. Agencies such as the Health and Safety Authority, Workplace Relations Commission, Revenue Commissioners, and the National Roads Authority have legal provisions in place to allow for information exchange with other agencies. While there is a commitment to address the legal requirements necessary,

the Authority's preference is that this needs to be addressed sooner in the context of improving the efficiency and effectiveness of enforcement including those requirements to be enforced under the EU Mobility Package.

5.1 What are your views on how Ireland implements the Mobility Package changes?

RSA recommendations:

- I. The proposed road haulage strategy needs to acknowledge the importance of effective and efficient enforcement to enforce the requirements of the EU Mobility Package.
- II. New legal provisions to facilitate the enforcement of the EU Mobility Package be adopted without delay.
- III. Deficits in the enforcement toolkit be addressed as a priority.
- IV. RSA staffing resources need to be augmented to enable the requirements in the EU mobility Package to be enforced on a consistent basis.
- V. Legal provisions to facilitate enforcement exchanges with other relevant agencies be adopted as soon as possible, and
- VI. A fixed charge system be adopted for road transport related offences which would also apply to the measures contained in the EU Mobility Package.
- VII. A review of the scope of operator licensing rules to include light commercial vehicles engaging in hire and reward within the State should be considered.

5.2 What are your views on the return of the truck?

The 'return of the truck' is an organisational obligation on the undertaking to ensure that the vehicles which are at its disposal and are used in international carriage return to one of the operational centres in the Member State of Establishment every 8 weeks. This new obligation on the operator is introduced under Regulation (EU) 2020/1055, article 1(3) which amends article 5 of Regulation (EC) No 1071/2009. It becomes applicable from 21 February 2022.

The obligation for the return of the truck, is in addition to the obligation to organise the work of drivers in such a way as to enable them to return to the employers operational centre where the driver is normally based in the Member State of the employers establishment or to the drivers place of residence within each period of 4 consecutive weeks. This obligation became applicable from 20 August 2020.

To date there have been no discussions at EU Enforcement Working Group level on the enforcement of the 'return of the truck' requirements. Given the obligation on the undertaking to organise the return of the vehicle, compliance with the requirements will have to be addressed through operator premises inspections.

The RSA will be liaising with the European Commission about the practical enforcement of the obligations regarding the return of the truck and driver to ensure a harmonised approach. In addition the Authority would expect to publish guidance material for operators concerning the requirements. At this juncture, international operators need to carefully consider the impact of the requirements for their operations.

5.2 What are your views on the return of the truck?

RSA recommendations:

- I. RSA should continue to engage with the EU Working Groups concerning a harmonised and practical application of the requirements contained in the EU Mobility Package including those relating to the return of the vehicle.
- II. RSA should publish simplified guidance material as soon as possible on the application of the relevant rules taking into account national legal requirements and the potential consequences of non-compliance; and
- III. RSA should engage with relevant stakeholders concerning the enforcement of the rules as soon as possible.

6. Road Infrastructure and Usage Charging

Introduction

Road infrastructure that is efficient and congestion free is a fundamental part of the road freight system. Freight transport demand is expected to show continued growth until 2050 according to EU and ITF forecasts. While road freight transport delivers significant benefits, there are also substantial dis-benefits in respect environmental impacts, congestion and safety.

The proposed haulage strategy by the Department will need to show a clear pathway on how to make better use of the current resources such as roads, vehicles while also developing new strategies to change behaviours, improve the sustainability and economic competitiveness of the sector in a safe way.

6.1 Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?

Road infrastructure constitutes an essential component part of the transport system: it is evident that there has been significant investment in new and supporting infrastructure in the recent past. This investment needs to continue and new options might be explored to reduce HGV vehicle congestion particularly in/within Dublin Port and M50 and also improving environmental sustainability as well as road safety. Availability of additional service areas capable of accommodating HGV vehicles and drivers seeking a safe and secure place to take breaks and rest periods needs to be accelerated across the country – the road haulage associations while acknowledging improvements in this regard, grumble about the absence of suitable facilities in some parts of the country. These sites perform an important road safety purpose including encouraging drivers to take breaks and rest periods.

As part of the development of service areas, space should be made available for enforcement areas to facilitate vehicle and driver inspections by An Garda Síochána and other State agencies in respect of the discharge of their enforcement responsibilities. Such measures should also include the capacity for An Garda Síochána to use directional signage requiring commercial drivers to drive into a service area for an inspection.

Apart from the service areas, more rest areas including lay-bys on the roads network can contribute to the safety of commercial vehicles and drivers as well as other road users. These facilities also potentially afford the enforcement agencies to increase their visibility and the intensity of enforcement in the localities concerned and raise deterrence.

The proposed strategy must also explore opportunities for improved supply chain efficiency and potential barriers to achievement of same and how the road freight sector and the logistics sector need to collaborate to facilitate environmental sustainability, reduce transaction costs and facilitate the movement of freight through supply chains going forward. Adopting new technologies including greater automation/connected vehicles will also need to be prioritised to facilitate greater productivity, data collection and also to promote the benefits of same to industry and enabling them to improve competitiveness.

6.1 Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?

RSA recommendations:

- I. To accommodate forecasted freight demand and to ensure road safety, existing infrastructure must be optimised and the road haulage strategy must identify the future investment needs for road freight particularly along key gateways including the regions.
- II. Additional service and lay-by areas on the roads network to be provided for drivers to take breaks and rest periods. Larger service areas should include capacity for the carrying out of enforcement activities and this should be factored into future service area provision.
- III. Investigate options for greater collaboration/integration between the road freight sector and logistics sector in order to enhance sustainability and opportunities and identify potential barriers.
- IV. Identify and support digital infrastructure to support the road freight industry and deployment of freight technologies including data collection.
- V. Build long-term forecasting and modelling capacity for benchmarking, investment, planning and reform purposes including incentivising academic involvement/centre of excellence on the freight transport sector.

6.2 What more is needed in relation to road user charging for freight transport in Ireland?

The Road Safety Authority does not have any contribution to offer to this particular question in the consultation document.

7. Labour Market and Skills

The RSA does not have any explicit mandate in respect of national manpower policy. The RSA does have concerns that driver shortages has the potential to put further pressures on the available drivers to get more done in less time. The temptation for some is to make up for lack of drivers by cutting corners, working longer, reducing safety margins, driving faster than is safe, breaching road traffic rules: all of these have an impact on road safety risk, working conditions and ultimately on the well-being and safety of HGV drivers and the wider public.

Road haulage industry skills and labour issues

It is evident from the Department's consultation document that nationally and across the EU, the road transport sector is competing for labour and there are acute skills shortages at a time when there is continued growth in trade volumes, an aging workforce in the HGV driver cohort and challenges about the industry's image. The pandemic and the impacts of Brexit have potentially exacerbated the current shortages – some drivers may have returned to the country of origin during the lockdown and restricted travel. Delays and pressures on drivers as a consequence of extra checks at border points brought about by Brexit particularly those operating to/from or transiting the UK may also have aggravated the current shortages in the industry. The skills shortage is having an impact on business expansion, service standards and growth opportunities and makes dealing with issues posed by the pandemic and Brexit more difficult.

The appeal of the road freight transport industry and its capacity to attract and retain HGV drivers and other support staff into the industry is vital to its long-term sustainability and success. The industry associations recognise that the current demographic in respect of age and gender profile is an ongoing problem that needs to be addressed swiftly and effectively to ensure a pool of HGV drivers. Current economic and labour projections indicate that economic growth and resulting road freight transport requirements are likely to exceed growth in the HGV driver pool resulting in a continuing deterioration in HGV driver shortage. The average age of drivers is continuing to grow and there is a significant reliance on male drivers. Women are under-represented in the HGV driver profession and there is a lack of diversity within the HGV driver cohort.

Aggravating factors

While the road transport industry is aware of the particular shortages and potential consequences, the wider public and industry have not been affected by these difficulties. The problem of driver shortages is not a new one and this has been recognised by the representative associations over the years. Another concerning observation is that it is not evident that the haulage industry has the capability itself to address the particular issues particularly because of the costs of insurance for younger and inexperienced drivers and to offer better conditions of employment and pay.

The labour and skills pressures in the road transport industry could be masked to a degree by illegal and/or informal operations being undertaken by some drivers who complete additional driving and working activities that is not recorded on tachographs

raising concerns from the road safety perspective but also fair competition. Informal working opportunities may potentially give rise to occupational safety and health (OSH) and public safety concerns and thereby further undermine the image of the industry.

Relieving the burden on drivers having to deal with tightly scheduled route plans, traffic congestion, short loading and unloading stops must be examined by the industry: some drivers have to wait long times at hub facilities which in turn intensifies the pressure on them for subsequent journeys while also simultaneously have to deal with the driving task. Drivers must be allowed to take a break when they are fatigued to avoid sleeping at the wheel – relieving the burden on the HGV drivers is essential not only for the long-term sustainability of the profession but also to achieve Vision Zero. Achieving enhanced road safety within the road haulage sector will only be possible if the hauliers and consignors including loaders, freight forwarders and others tackle these issues in a cooperative way supported by adequate enforcement.

A further factor that may be having an impact on skills availability and retention is the dispersed and fragmented profile of the industry – there is an absence of consolidation, and this impairs opportunities to obtain greater market share and to realise synergies which in turn reduces opportunity for skills development and mobility. While entry barriers to the road haulage industry are relatively low and the level of regulatory complexity is low compared to other modes, this has resulted in a highly fragmented sector – some of these operators may not have the capacity to diversify to meet new and emerging needs or opportunities to increase cash-flow against the backdrop of new customer demands, faster transit times, less product handling, emissions, just in time deliveries etc.

If the issues raised above are not addressed in the immediate term and industry is not supported in bringing about reform on these matters, these issues will surface in a more acute manner in parallel with the exponential future growth in demand for goods. The RSA believe that these issues require urgent attention, and the industry must be supported in problem-solving and reforming these matters recognising that the primary responsibility for resolving them lies with the road haulage industry.

RSA data shows that there were 41,447 new Class C Licences issued in the period between 2010 – 2020 inclusive with an annual average of 3,768 . Excluding 2020 data shows that the annual average was 3,868 in the period between 2010 and 2019. The RSA does not have any data on the numbers of foreign drivers with a HGV licence declaring as being employed in Ireland nor the numbers leaving the driving profession on an annual basis over the review period.

7.1 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.

The Department consultation acknowledges that not only is there an acute shortage of HGV drivers, there is a shortage of skills shortages in logistics, customs agents, skilled transport managers and allied support staff including mechanics who are vital to ensuring vehicles remain in good mechanical working order and roadworthy. As referenced earlier, the problem of HGV driver shortages is not a new one and the issue has not received the concerted focus needed resulting a position where urgent action

is required to address the particular concerns. The following paragraphs puts forward some points for consideration that may alleviate the particular concerns

Road transport industry image:

The perception of working in the road freight industry is negative and the profession of a HGV driver is not perceived by young men/women to be a rewarding or sustainable career.

The road transport industry is under-appreciated, and it is important to acknowledge its important contribution to the economic and social well-being of the economy and the general public. The image of the industry has evolved considerably – in the past HGV driving was perceived as an attractive career option, allowing workers flexibility and to work independently and to travel internationally. However, expectations and the sector has changed fairly dramatically, and younger people have different career and lifestyle expectations particularly easy access to international travel, training opportunities, better pay and the sector has lost its appeal.

A change of image of the sector is vital if new recruits are to be attracted to the industry. Some of the existing drivers would wish to depart from the industry but because of their age, level of educational attainment and limited skillsets cannot pursue an alternate career choice.

Factors Influencing the Image of the HGV Industry

Factors that may influence the image of the sector and deter people considering a career as a HGV driver include the following: -

- Low relative and absolute rates of pay – basic pay can be low, and income is topped up with travel and subsistence.
- Sedentary lifestyle of many HGV drivers and the demands of the job including sleep deprivation resulting from working shift patterns and time away from family.
- Exposure to liability and health and safety risks while driving abroad including personal danger resulting from illegal immigrants.
- Limited benefits and poor terms and conditions of employment.
- potentially high-risk exposures to occupational health and safety risk.
- significant pressures faced by drivers from customers, employers, road users and enforcement and in some cases driver coercion to break rules.
- the profession is identified as being poorly paid and mainly involves low skilled work.
- Job insecurity/poor job design resulting in repetitive and physically demanding tasks.

- High cost associated with obtaining a HGV driver's licence estimated at €3,000 for a Class CE.
- Potential exposure for liability placed on driver in the event of a collision including possible findings that emerge during an enforcement test; and
- Lack of progression opportunities for HGV drivers and women within the industry.

Apart from the above, the industry is perceived to be male dominated with opportunities for training or advancement limited. It is also perceived that it takes a long time for a school leaver to acquire a HGV driver licence and there are quicker pathways for better earnings in other sectors or possibly emigration. Some drivers complying with the legal requirement for completion of the Driver CPC course annually are obliged by the employer to complete the course during their personal time as opposed to during the working week.

The industry image is also tarnished by a small number of operators who cut corners in terms of their compliance obligations which undermines those operators which operate to good standards.

The industry has also been identified as one of the significant contributors to greenhouse gas emissions. Heavy vehicle overloading and a culture of non-compliance by some continue to present a significant challenge despite the concerted efforts of the various enforcement agencies.

In addition to the above, there is an absence of understanding of the various technological enhancement and management opportunities within the road transport industry that offer attractive career paths as well as opportunities for moving between different sectors of the road transport industry including logistics, operational and financial management and other transport modes.

Raising the image of the road haulage sector:

Due to the complexities and inter-related contributory factors causing driver shortage, there is no one solution and a multi-faceted approach will be required involving primarily market led solutions supported by public policy initiatives. Operators and their associations will need to tackle this problem in a much more coordinated and concerted manner than has been in the case to date. A long-term perspective of the road haulage transport industry is required. The industry is currently cost driven, and the negative aspects of the industry as outlined above arise from tight profit margins and such pressures. Innovations that reduce cost and increase productivity need to be made more available to industry. Reducing reliance on carbon producing vehicles may play a role in this cost reduction. Combatting congestion, both on our road networks and at transport hubs and transit areas need to be tackled in order to enable the industry to be more productive.

The Department's role will be to encourage and empower the industry to make strategic choices regarding their investments by researching and providing reliable information, guidance on the availability and use of innovations to improve operations generally.

In addition, to attract new recruits, the industry needs to be plugged as a progressive environment, and references to the dynamic forces of new mobility options could be integrated into this campaign. Career progression from apprentice to driver to transport manager may be useful and the Department could work with industry to develop solid training paths for this, which may enable school leavers to see the career as diverse and flexible, allowing travel and experiences at an earlier stage in the career progressing into management and office-based progression options and to combat the perception that the career choice is not family oriented in the long run. The industry might consider offering placements to transition year students to see the varied jobs available including warehousing, driving and transport management.

Low level of enforcement has been a long-standing area of concern in road transport policy. Although the EU has started harmonising enforcement practices in the areas of working and driving times as well as roadworthiness requirements across the EU, enforcement can be challenging due to the intrinsic characteristics of the sector, such as fragmentation, evasion of inspections, phoenix operations, illegal cabotage, inadequate enforcement toolkit, dealing with out of State operators and sporadic enforcement.

Raising the image requires a multi-faceted approach involving commitment and collaboration between public and private sector entities but as referenced earlier, the principal responsibility for addressing the issues rests with the industry. Mitigating actions will have limited impact in the short-term and a longer term and a concerted approach is necessary to addressing the driver shortage problem.

Possible market led initiatives:

- a. increase driver pay and offer incentive packages but this will not be enough on its own.
- b. Retaining talent in Ireland by stimulating improved working conditions for high-demand jobs in the road freight transport sector.
- c. improve driver scheduling and facilitate a better work-life balance.
- d. improving age friendly driving activities for older drivers of HGV vehicles.
- e. promote career opportunities for HGV drivers amongst school leavers, unemployed persons, women and other under-represented groups in society in order to consider it as a career.
- f. increase skill levels in respect of HGV driving including supervisory opportunities within the business.
- g. upskill the current driver cohort to manage the various new and emerging technologies and a changing sector particularly in respect of more sophisticated vehicles, SMART tachographs etc.
- h. research the needs for women as HGV drivers and factors that influence their decisions not to pursue HGV driving as a career or why they may leave the industry.

- i. publish information concerning initiatives taken to promote the achievements made in addressing climate change challenges within the road freight sector as well as job opportunities.
- j. address lack of employee voice and representation as drivers have no voice in the industry.
- k. Improve supply chain practices particularly at key hubs such as ports, major distribution centres.
- l. Organise driver to take into account the demands of a journey when scheduling drivers and build sufficient time to enable the driver to reach their destination before the driving time limit is exhausted and adherence to the resting and break rules.
- m. Greater consolidation in order to obtain greater market share and realise synergies; and
- n. Development of a mentoring programme for new and younger drivers and exploring opportunities for reduced insurance premia.

Possible public policy initiatives

- 1) Promote and provide financial support for high quality apprenticeships in the HGV driving profession and allied services sectors including vehicle repair and maintenance to meet anticipated demand:
- 2) Promote continuous professional development for transport managers to enhance their capacity and leadership within the road transport sector potentially leading to additional qualifications, greater advancement and greater mobility and being equipped with the capacity to deal with future challenges.
- 3) Provide additional and accessible resting facilities on key roads for commercial vehicle drivers to take breaks and rest periods with appropriate security measures including urban areas.
- 4) Survey on prevalence of HGV driver fatigue, working time patterns, collisions, incidences involving commercial vehicles while driving for work.
- 5) Develop a healthy HGV driver and health promotion interventions for HGV drivers to address physical and mental health matters associated with a sedentary and isolated role.
- 6) Collaborate with industry on identifying the benefits of eco-driving, updating fleets, opportunities for automated driving/platooning to expand capacity.
- 7) Improve industry knowledge of available training opportunities and provision.
- 8) Continue measures to professionalise the industry and creating fair competition including adoption of measures for consignor, shipper, loader liability for breaches of road transport legislation.



- 9) Improve collaboration between agencies that have an enforcement remit in the road transport sector and increase enforcement capacity.
- 10) Improve research to better inform public policy and that the requisite information to plan and regulate the road transport sector going forward is available taking into account broad sectoral developments.
- 11) Implement an ‘*earned recognition*’ system for operators who demonstrate high standards of compliance in respect of their operations to include driver wellness covering aspects like effective fatigue management, driver’s hour monitoring etc and road safety matters systematic vehicle maintenance, daily walk-around maintenance checks, load control, speed management, route risks management, monitoring safety indicators etc
- 12) Expedite processes associated with approval of applications for permits under the Department of Enterprise, Trade and Employment critical employee’s scheme.
- 13) Put in place advisory measures for operators in place which are engaged in international road haulage activities to ensure best practice is applied against illegal immigration.
- 14) Continuously review the Driver CPC modules to ensure that it remains up to date and delivered by personnel with direct industry experience.
- 15) The new Road Safety Transformation Programme contains an action around the creation of a driving standard (and its adoption by Employers) for those driving for work. This would help to give particular recognition to the role of the driver and the competence required to do the job well, while improving road safety.

7.1 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.

RSA recommendations:

- I. Resolution of the particular issues associated with driver shortages is primarily the responsibility of the road haulage industry as well as dealing with the associated commercial issues.
- II. Market led and public policy actions are required – there is no one solution and a multifaceted approach is recommended including promotional measures to improve the industry’s image, encouraging young men and women into the driving profession, health promotion and other suggestions contained in the RSA response to this consultation.
- III. A multi-faceted and multi-agency approach working with the industry is required to address the skills and labour shortages in the road freight industry working with the wider logistics sector.

- IV. Addressing low levels of enforcement over the years, poor sanctioning regimes and deficits in the enforcement tool-kit must be part of the solution to dealing with those undermining compliant operators and who tarnish the image of the industry.
- V. A survey of operators and drivers is required to identify skills shortage and longer term needs and possible options to address the work-force challenges in the road freight industry.
- VI. In collaboration with the industry, create opportunities for pathways into the HGV driving profession.
- VII. Attract women into the HGV driving profession as well as opportunities for greater diversity.
- VIII. Working with the industry, promote the importance of the industry including opportunities for advancement, upskilling etc.
- IX. Additional resting areas be made available for drivers of HGV goods vehicles on the roads network.
- X. Collaborate with the industry about a survey drivers on the issues of concern to them including HGV driver fatigue, working time patterns, pay levels, risks, collisions, skills gaps and obtain an understanding of longer term needs and possible opportunities to address labour and skills shortages.

7.2 How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?

There is no single bullet and a multifaceted and sustained approach will be required to enhance the perception of the haulage/logistics industry. From the RSA perspective, the following might be considered.

Enhancing the role of Transport Managers

Existing statutory provisions define the role of Transport Managers within the occupation of road haulage operator. Essentially those provisions foresee that the Transport Manager is the person identified as having continuous and effective responsibility for the undertaking. In an Irish setting, this function would be discharged by the owner or a family member.

There is no legal obligation for an own account operator to nominate a Transport Manager or that the person managing the fleet for such operator has achieved a minimum level of training to manage drivers and vehicles.

Transport managers have a distinctive role prescribed by law. The job can be demanding and includes looking after compliance standards for an operator's fleet and their drivers is a challenge. While many Transport Managers work hard in a challenging role, it is vital that there are continuous professional development opportunities, and they are kept abreast of latest developments.

In the context of enhancing the status of the role of Transport Manager, the RSA recommends the following:

- 1) Continuous professional development and upskilling of Transport Manager delivered on-line where possible, possibly similar to the Driver CPC delivery arrangements.
- 2) Promote the importance of the role and hold those to account where there is evidence of poor standards of compliance in terms of the key road transport provisions including road safety requirements.
- 3) Survey transport managers (and others in the sector) to obtain their views on their responsibilities, job-role challenges, opportunities for upskilling, greater mobility, age profile and continuous professional development.
- 4) Creating role models and champions to promote the role and importance of Transport Manager.
- 5) Promoting graduate entry into the Transport Manager role/designing career path for drivers to become Transport Managers.
- 6) Require own account operators to appoint a Transport Manager who holds the requisite qualifications for the role.

Enhancing the role of a commercial vehicle driver:

Driving a commercial vehicle is a complex task requiring a reasonably high level of skill as well as being a difficult profession and lifestyle.

Drivers have to simultaneously interact with the vehicle and the external environment within which they operate. They spend the bulk of their time on the road and therefore are exposed to significant health and safety including road safety risks.

As far as the RSA is concerned, there is little known about professional commercial vehicle drivers in terms of their attitudes, concerns and issues affecting them in the performance of their day to day driving activities and their changing role from being simply a driver to ongoing changing requirements in terms of employer expectations and the wider setting within which they operate including road safety requirements.

It is time that there was a survey undertaken of commercial driver attitudes in terms of their role, status and issues affecting them.

Other opportunities include:

- Improved terms and conditions of employment including pay, bonus schemes, compliance.
- Improving services for commercial drivers particular rest areas on the roads network.

- Improving job satisfaction – better scheduling to accommodate a work – life balance, access to additional training to enable drivers improve their craft and to provide a safe and efficient service.
- Promotional activities to become an owner/driver and being self-employed.

7.2 How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?

RSA recommendations:

- I. Improving the perception of the roles in the haulage and wider logistics is primarily the responsibility of the road haulage industry as well as dealing with the associated commercial issues including wages, terms and conditions, work-life balance as well as compliance matters.
- II. Industry needs to be supported to promote fairer competition in the intensely competitive industry through better enforcement and resolution of deficits from the enforcement perspective.
- III. Collaborate with industry to obtain HGV driver and operator perspectives on the industry in respect of issues affecting them including labour and skills shortages.
- IV. Enhance the role of the Transport Manager through CPD.

7.3 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?

Increasing the capacity of the haulage sector to attract and retain talent will be influenced by a range of different matters many of which are outside the direct influence of the operators concerned and some that occur within the industry. Those factors outside the control of the industry includes current employment/unemployment rates, supply and demand factors including accessibility of jobs in the region/area etc. Earlier sections of this submission identified particular issues in the industry including perception and image, lack of data, illegal activities etc while also acknowledging that demand for services is likely to grow in the medium term.

Taking these into account, the following may enhance the sector to attract or retain talent

- Improving conditions of employment as well as pay for drivers as part of an overall suite of measures to be led by the industry supported by public policy measures identified in previous sections of this response to the Department’s consultation.
- encouraging young people, women, unemployed and those under-represented in the road freight sector to take up local employment opportunities in the sector using a public and private partnership approach.

- streamlining the permits scheme facilitating the recruitment of foreign immigrants while also recognising that this is not a long-term solution and indeed would be evidence of an absence of a longer-term strategic approach to address the particular skills shortage.
- improving the image of the sector: stimulating and organising promotional activities in the road freight transport sector, importance to the economy locally and nationally and potential opportunities.
- reviewing opportunities for greater mobility within the various transport modes and skills requirements and promoting opportunities for mobility.
- establishment of some form of recognition system for employers engaged in positive working practices for staff, and
- Company promotions/corporate social responsibility activities.

7.3 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?

RSA recommendations:

- I. Market-led solutions will be necessary to enable the industry retain and attract talent into the driving profession.
- II. Supporting measures could be implemented by the public sector to ensure fair competition and that non-compliant operators are targeted and encouraged to improve standards.
- III. The RSA consideration of this question contains possible options that may be relevant to be considered for the haulage industry.

8. Integrated Transport Planning and Intermodal Transport

8.1 Is freight transport being taken into account sufficiently within Ireland's integrated transport planning system, particularly the various transport strategies for urban areas?

There are a number of agencies with specific responsibilities for developing, integrating and implementing the State's transport system. To plan and shape an integrated transport planning system that delivers the desired safety outcomes requires that these parties take into account strategies dealing with engineering, land-use planning/spatial development, traffic and demand management planning, enforcement, educational matters, economic and social policy, etc. A holistic approach, involving analysis, coordination and consultation in all of the key areas outlined above will facilitate the road freight transport perspectives to be taken into account when framing national policy. The decarbonisation agenda is expected to play a more significant role in national transport planning and, considering road freight is a key contributor to transport emissions, the most efficient movement strategies for goods must be a key goal in the national transport policy.

From the road safety perspective, the existence of successive government road safety strategies is evidence that this a key item of importance in the State's transport planning structures requiring entities to collaborate, initiate, implement and coordinate road safety measures as well as assign necessary resources. Each of the strategies have had common themes. Recent road safety strategies have included specific measures for the road freight industry including the latest Strategy covering the period up to 2030 which encompasses the Vision Zero approach. Clear responsibility and action plans including timelines have been included in the new Road Safety Strategy to facilitate follow-up and greater accountability. The Strategy has been developed to further improve infrastructure, improve enforcement, encourage technology and innovation and positively influence driver and other road user behaviours.

The planning, drafting and development of the strategies has followed best practice recommended by the EU Commission, European Transport Safety Council, World Health Organisation etc.

Over the past few years, a number of inter-urban network developments have been completed linking Dublin to major regional centres. These developments have contributed to reduced transport costs for the road freight sector: in addition these developments have also contributed to the reduction in collisions and fatalities through safer road designs as well as reduced travel times on important urban corridors. Continuing the development and upgrading the road network at a sustained pace is essential to ensure economic and safety benefits can be assured across all of the regions'

Road freight transport demand is expected to show continued growth in the years ahead. It is essential that the specific needs of the industry are taken in to account having regard to the importance of a reliable haulage industry to support economic and social development as well as the challenges posed by climate change and having regard to the wider policy imperatives including passenger transport. The negative impacts of road freight need to be minimised to the greatest extent possible while ensuring the optimum use of existing infrastructure as well as greater integration of supply chains. Earlier sections of this submission put forward possible options to encourage the road haulage industry to upgrade their fleets and to ensure high quality, reliable and safe services and to optimise existing road infrastructure and enhance road safety.

It is the RSA’s view that road freight transport has been taken account of to date in the State’s integrated transport system, and this is evidenced in the strengthening of road infrastructure links between major urban areas and the recent growth in the number of service areas on the TEN-T due to Ireland’s Service Area Policy. There are some gaps in service area provision that are expected to be addressed by the agencies involved soon.

Freight patterns are rapidly evolving, and the upcoming work that is due in Ireland’s integrated transport planning must be reflective of the trend of distribution centre growth mainly sited near motorway junctions and on the periphery of urban centres, the influence this trend will have in terms of infrastructure upgrades and provision and the protection and preservation of road safety in these locations that are about to be impacted. The Road Safety Strategy 2021-2030 plays a significant role in this regard, and should be a reference point for designers of this new infrastructure.

<p>8.1 Is freight transport being taken into account sufficiently within Ireland’s integrated transport planning system, particularly the various transport strategies for urban areas?</p>
<p>RSA recommendations</p> <ul style="list-style-type: none"> I. Road freight transport must continue to be taken into account in the development of Irelands transport planning system and road safety must be at the heart of that system. II. Further extensions of the inter-urban network should be considered taking into account national strategic objectives in respect of mobility, climate changes, regional development and road safety.

8.2 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?

The RSA has no intelligence concerning the success or otherwise of these developments. As a general principle, the Authority would recommend staggered delivery arrangements, less lorry movements and low impact delivery schemes recognising the potential road safety but also potential environmental benefits. HGV vehicles have a lower share of collisions but the incidents are serious.

8.3 Where do you think an increase in rail freight infrastructure or capacity could best benefit the road freight sector?

The RSA has no particular comment on this specific question, although is generally supportive of initiatives that will improve and optimise the freight movement industry.

8.4 What are the barriers which prevent movement of freight by rail?

The RSA has no particular comment on this specific question. Any policy developments in area rail upgrades to metropolitan commuter rail or rail corridor upgrades (for passengers and freight) are likely to lessen the demand on road infrastructure, which would be positive in terms of road safety. The RSA would be interested in providing input to future policy in this area, and in particular mitigations to prevent short-term impacts when providing medium and longer term rail solutions.

8.5 What further action is needed to improve the hinterland connectivity of Ireland's ports and airports, particularly in light of Brexit?

Other than the earlier recommendations in this submission in terms of Brexit including recommendations for additional roadside service areas/lay-bys referenced earlier, the RSA has no particular comment on this specific question.

Appendix A – Intervention Pillars

Safe Speeds is a central element of the Safe System approach. In a highly competitive, time-pressured freight delivery environment, safe speeds is of particular relevance. Heavy goods vehicles are regulated in terms of speed limitation and tachograph law. In a 10-year strategy, focus must remain on ensuring a safe speed environment, taking cognisance of the evolving modes of goods transport, the increasing prevalence of smaller cargo courier deliveries, the increasing presence of suburban and peripheral transport hubs and the impact this, i.e. a greater volume of delivery vehicles on our streets, potential for increased breaches of speed compliance on our urban and rural environments. Speed limit enforcement will be even more fundamental than it is at present. The 10-year strategy will need to consider the changing mode of goods delivery, and strategies that improve the overall efficiency of goods delivery from an environmental perspective will also need to be fully aligned with the Vision Zero goals.

Safe Vehicles this priority intervention will address the safety of road users both inside and outside the vehicle through legislative standards, consumer information, public procurement and industry initiatives. Freight delivery vehicles, by their size and nature of construction have the potential to present more risk to vulnerable road users and surrounding vehicles than other vehicles on our roads. Important advances in the safety features of vehicles have been progressed recently, including measures to help avoid a collision (e.g., direct vision cab design, forward collision warnings, pedestrian and cyclist collision warning), and to mitigate the severity of a collision when it does occur (e.g., Advanced Emergency Braking, ensuring rapid post-crash response using eCall). Heavy-duty vehicle direct vision is one of the most important road safety measures due to be mandated in the coming decade and has been developed by pioneering OEMs in the interests of transforming the safety of heavy-goods fleet. Plans to decarbonise heavy goods fleet must incentivise vehicle models that include these important safety features. It is important that any incentivisation schemes or purchase grants for vehicles are strongly linked with the safest vehicles.

Safe Road Use incorporates a wide range of safety behaviours, such as compliance with the posted speed limit, driving without impairment (due to alcohol, drugs, fatigue or distraction), helmet wearing, and seatbelt wearing/correct child restraint use. This Safe Road Use intervention is important to the road haulage industry in terms of protecting occupational safety, improving the image of road haulage as a safe environment to work, thus attracting new entrants to the professional driving profession and in protecting other road users and also reducing company insurance claims.

The proposed 10-year strategy must support the industry in setting policy and providing mechanisms and incentives to promote safer road use practices including recommendations for telematics use, driving training, eco-driving techniques and wider educational campaigns. Driver CPC may have a key role in this field of policy.

Safe road use policy involves setting road user standards (e.g., driver training and licensing requirements), developing traffic legislation and implementing targeted enforcement. It also includes public education and awareness campaigns, and harnessing the benefits of safety technologies, all to prevent and mitigate fatal and serious injury risk.

Safe Work-Related Road Use involves the planned, systematic safety management of work journeys on the roads, aiming to reduce the risk of death and serious injuries involved in making these. Safe Work-Related Road Use includes journeys made using publicly or privately owned/leased motor vehicles (including motorcycles), as well as cycling or walking.

One of the main themes of the 10-year strategy for the haulage sector must include safe work-related road use as this is fundamental to the sustainability of a well-functioning and safe haulage sector

Údarás Um Sàbhàilteacht Ar Bhóithre
Road Safety Authority

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and safely manage all your
driver information, services,
tests, permits and licences.

Date 01/07/2021

Good Afternoon

With reference to your article in Fleet Magazine I am delighted that you have decided to ask hauliers and lorry drivers for their opinions on the present situation in which we find ourselves.

I would like to highlight some topics and concerns relating to the haulage sector today. Basically as I see it, our haulage industry is in a mess. Our small transport companies are going out of business and one of the causes of this is the shortage of skilled drivers. When I was a young boy of 8-10 years of age I travelled with my father in his truck. I learned so much from observing his driving skills, saw how repairs were carried out and acquired the knowledge of how he ran the day to day workload in an organized way. I had a hunger to learn and developed a great interest in haulage. I was then able to acquire my HGV licence at the age of 18yrs for a small sum of £25. I did not attend a school of motoring, I did not do ten or twelve lessons to pass my test. I needed no lessons as I had learned by accompanying my father over the years and practiced in our yard and fields. This type of learning produced very skilled drivers as they had learned from experience.

By comparison today most lorry drivers are not allowed have any passengers on board. Many businesses will not allow anyone other than the lorry driver to enter their property. If a driver brings their son in the cab he will have to either hide in the bunk of the lorry while the load is being offloaded or wait at security. This is not an enjoyable experience so obviously the youngster will not want to repeat the experience and misses out on valuable "on the spot" learning. Today the system of getting a HGV licence is very different and so expensive. It can cost between €3000 and €6000. This costs accrue from driver theory test, twelve car licence lessons, car licence test, rigid lorry lessons, payment to hire the rigid lorry for the test, rigid lorry test, medical to obtain rigid licence once test passed, artic lorry lessons, payment to hire the lorry for the test, payment for CPCs prior to doing test, payment for the artic lorry test and payment for another medical to obtain the artic lorry licence, once test passed. Of course if one fails any of the tests then the costs go up accordingly. Please don't get the wrong impression from me. I am all for safety but taking 12 lessons does not necessarily result in a competent lorry driver. Learning from experience is vital. For working class people and many youngsters who would like to drive a lorry cannot possibly afford these costs and thus results in a great shortage today of qualified drivers.

The cost of insurance for the haulage sector is off the rictor scale. There is no competition in the insurance industry in Ireland. Very few insurance companies are willing to even give a haulage company a quote. When we look for insurance at renewal time we are told by brokers that we have a better chance of getting a quote if we restrict our enquires to one insurance company, as, if other insurance companies are aware that we are asking a few of their competitors for a quote, then they won't entertain us at all. Is this a fair system I ask???? We are also asked to sign a form giving one insurance company the sole right to quote us while all their competitors are prevented from quoting us. To insure any artic driver under the age of 25yrs is seriously expensive. I know this from experience. But if one of my drivers under the age of 25yrs works for another big haulage company for a few days his age is not even required. So where is the consistency and fairness in this. Also it appears that large haulage companies can get insurance easier and at a cheaper rate than the small haulage company despite their track record for accidents and safety. There are far too many inconsistencies across the board in haulage.

Once the insurance cost has been overcome then the driver goes out on the road and is open to inspections from RSA and roadside checks. There is a lack of consistency in these roadside checks. A driver can be told that the wheel nuts on his wheels are not tight enough and he has no way of

objecting to this claim unless he carries a torc with him in the cab. Any offence can result in automatic 3 penalty points and if you clock up 4 roadside "offences" your artic licence is gone. The cost of compliance across the haulage sector has exploded.

The cost of a new artic lorry is approx. €130,000 and cost of trailer is approx. €60,000. Even though the lorry and trailer are European spec there is an extra charge of €130 for another standards plate. I for the lorry and €130 for the trailer. We pay €120 two yearly for taco calibration of our lorries, €200 aprox per lorry and per trailer each year for MOT and €100 for speed limiter sticker. The number of different tickets, cards, certs, trainings etc is increasing every year. Some are acceptable but it is now going out of control. An annual CPC training day and the material that is taught has not changed for years. Safe pass training, manual handling training, tickets to drive teleporters, specific Global Wind Organistaion manual handling and fire awareness to enter GWO sites and at least two access cards to enter the Dublin docks. These tickets do not ensure safer operations but if one has a ticket/card then they can proceed.

If a haulier is doing different types of haulage during the year, he may only be using certain trailers or tractor units at intervals or for seasonal work. Therefore they could be lying idle for 8 months of the year yet the MOT date will still be the anniversary of the first registration of the trailer. If a second lorry or trailer is bought and brought by new owner for MOT he may only get a week or a month of a test cert as the mot cert will be issued for a date on a yearly basis from the original purchase date of when the lorry was bought as new. The cost of the mot is the same but the length of time it is valid for can vary greatly. This is another excessive charge on the haulier.

Every few months we are dished out new regulations. Recently I have become aware that at the CVRT test centre the lorry is being plugged into the diagnostics. If a fault is showing then the owner is being given an advisory pass but next year this fault will be merit a failed Mot. So I can only conclude that it is ok to drive around with this fault in 2021 but it will not be safe to do so in 2022. Also there is no consistency between CVRT test centres. Bring a vehicle to different test centres and one will get five different results. This does not make sense. The vehicle testing system north of the border does not seem as strict as south of the border. Due to technology many faults in vehicles now have to be plugged into a computer to assist diagnosing the problem and to cancel the problem on the dash. Even when the problem is sorted it may not be possible to get it off the dash. God be with the days when a mechanic could take a history from the driver or drive the lorry, and be able to fix the problem. We are relying on technology too much in certain areas.

The taco regulations in Ireland are unworkable. Very often when making deliveries of collections from/to factories and industrial estates there are no suitable areas for parking. The driver may arrive to factory at 8am, have to park up a distance away from the site as no facilities for lorry parking at the site, wait there until unloading time possibly one hour or more, then drive to the unloading point and possible wait one hour or more before getting unloaded. This messes up his taco record and eats into the driving hours that he is allowed that day. If a driver goes above his driving hours it is a serious infringement when inspected by RSA but in many places in Ireland the facilities are not provided for drivers. In other countries parking areas and facilities are provided near factories or unloading areas.

The haulage sector seems to be the most regulated industry in Ireland. We have a serious shortage of skilled drivers because it is too expensive to obtain licence, too easy to loose it and as a result of serious compliance regulations no new drivers want to join the industry. Unfortunately most regulations are formulated by people who have never driven a lorry or have any experience of the haulage industry or running a haulage business. They may have university education and management positions but unless they at least discuss forthcoming regulations with experienced

lorry drivers we won't have a haulage industry in Ireland for much longer. Compliance and regulation are necessary but they need to be practical and workable.

Any haulier carrying abnormal loads is required to give anything from 4 clear day's notice to one month's notice of a movement to the county council departments of each county through which he plans to travel. Very often the haulier is not given this amount of notice of the impending need to transport the abnormal load by the customer. Today we were refused a three month permit to travel through Co Louth from Dublin. Northlink refused to give the permit stating **"Northlink don't approve permits for anything over 60T when the duration of the permit is 3 months or yearly. Written approval in advance is required for each journey on the M1 for loads of this weight and height."** This is despite the fact that we have to contact them in advance of any movement anyway even after the permit is granted. So to get around this problem I have been told I can apply for a single journey permit in each direction prior to each move. The reason I requested a three month permit was so I could have it in time as very often jobs get cancelled so the move does not take place on the date we were originally given or I am given insufficient time to apply for the permit. It is impossible to work in a legal way when the goalposts keep moving.

It is great that the Dept of Transport are now encouraging us to speak out and to discuss the problematic issues as prior to this we were afraid to do so for fear of being singled out and targeted by the RSA.

The Global Wind Industry in Ireland is a great idea but it is coming at a great cost and the amount of money wasted is sinful. These costs could greatly be reduced with better management. The industry is top heavy with people in the management areas and many of these positions are surplus to requirements.

We need to reduce our carbon footprint in Ireland but we certainly need to treat our lorry drivers with some dignity and respect if we want to continue to feed the people of Ireland. We could certainly reduce it by decreasing the importation of products which we produce here in Ireland. We are importing potatoes and corn which we can produce here in abundance. Our potato farmers are unable to sell their produce this year, yet there is no shortage of potatoes or chips in our shops as we are importing them. This is a disgrace. Our farmers who sow corn are not being offered a competitive price for their produce as lots of it is being imported. All the imports have to be transported by lorries from the ports adding to our carbon footprint.

The haulage industry in Ireland is vital. How else is food, medicines, plant, machinery and farming produce going to be transported in the future? Yet the small haulage contractor with ten lorries or less is being pushed out of the industry. Statistically it is frightening to count all those that have left the haulage sector in particular in the last year. I'm not sure what the future holds but it will be more bleak for lorry drivers if changed are not made quickly. No young lorry drivers are going to go into the industry in it's present state and this says a lot about the sector.

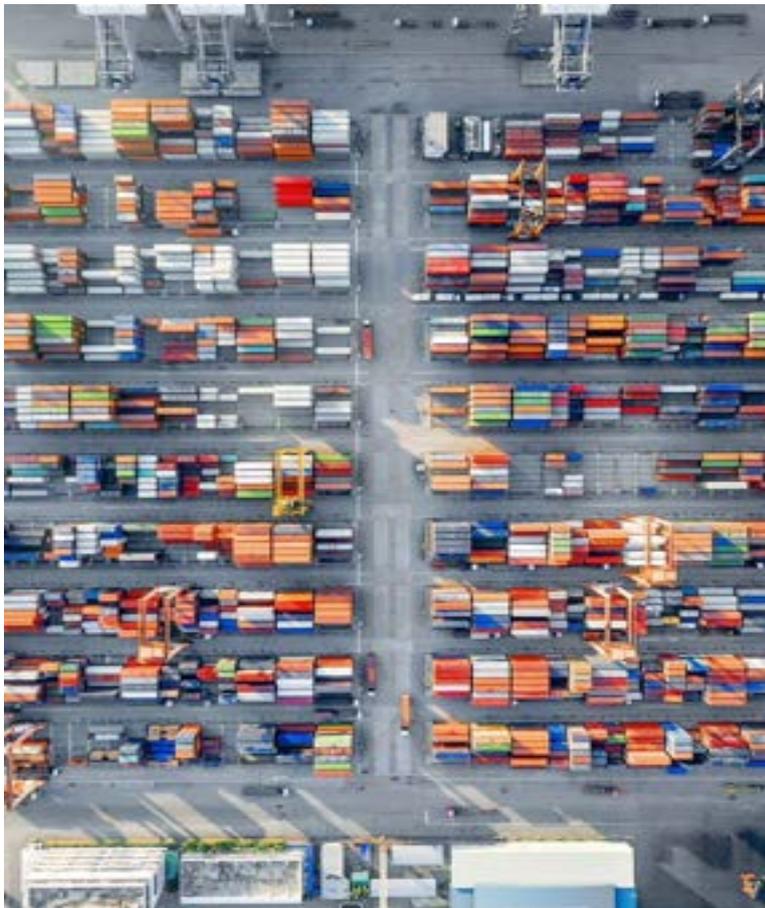
I hope this letter has given you some insight into the frustrations in our haulage sector.

Kind regards

Sean Lawler

SGS Ireland – Trade Facilitation Services

Department of Transport Public Consultation on
10 year Strategy for the Haulage Sector - SGS
Ireland Feedback and Comments



JUNE 2021

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1. Overview

1.1 Overview

SGS Ireland welcomes the Department of Transport's invitation to respond to the public consultation process in relation to the development of a 10 year strategy for the Road Haulage Sector. SGS Ireland has read the pre-consultation report published by the Department and would like to provide the following commentary, feedback and suggestions based on their experience in the sector to date in Ireland.

In addition to SGS Ireland's commercial experience, this submission benefits from recent research commissioned by the Group. Specifically, SGS Ireland commissioned research in January 2021 into updated trade flows and relevant supply chain analytics. The research was undertaken by Steve O'Sullivan PhD candidate, College of Business TU Dublin and overseen by Dr. Amr Mahfouz, Director of 3S Group & Lecturer in Management Science and Data Analytics at TUD. We have included ¹reference to this report as it also supports a number of the suggestions included within our feedback.

The research brief had a very specific focus, to establish as far as possible the available information and data on the following:

- Transit RoRo consignments and value using the GB land bridge from Ireland to the rest of the EU & forecast estimates. Data on route switching: landbridge to direct routes.
- Export RoRo consignments and value to GB from Ireland (including those through NI Ports).
- Import RoRo consignments and value from GB to Ireland (including those through NI ports)
- List of key stakeholders influencing decisions by exporters/transport about freight routes
- Main customs service providers : brokers, software, documentation services, advice & consulting
- Labour market & supply sector analysis
- Government investment policy – ports, shipping, labour market supply, export supports
- Possible national and EU policy and regulatory changes over the 2021-2023 period

Our researcher utilised the following data sources including: IMDO, CSO, Eurostat, DPC, UK Government Dept of Transport and Tom Ferris, Articles for IIEA and TU Dublin Post Brexit Report as the basis for his final report. The full report can be provided on request.

2. Introduction to SGS

2.1 SGS Ireland

SGS Group is an affiliate-based organisation; each country develops and customises services aligned with Group portfolio and appropriate to its own individual marketplace. Global Business Support units and Centres of Excellence are also distributed across the network.

SGS has been active in Ireland for over 40 years and currently employs over 400 staff in 38 locations across a network of business sectors. Appendix 1 gives an outline of the wide range of services which we provide in Ireland and internationally.

¹ Research undertaken by Steve O'Sullivan, 3S Group College of Business TU Dublin

2.2 Trade Facilitation Services

SGS believe that the Trade Facilitation Services that we provide have a particular relevance to the development of a 10-year strategy for the Road Haulage Sector by the Department of Transport.

Our Trade Facilitation Services support governments, government agencies and the private sector on trade facilitation, reducing complexity in global supply chains, securing duties and taxes, and verifying the compliance of products with regulations.

Services offered under trade facilitation are as follows:

- e-valuator
- e-invoicing
- Fighting Illicit Trade (FIT)
- Advance Cargo Information
- e-customs
- TransitNet
- Product Conformity Assessment (PCA)
- SGS Renovo
- SGS QiiQ

e-valuator	A secured computerized tool which interfaces with Customs Management Systems (CMS) for automated valuation assessments
e-invoicing	A service validating exporters worldwide and ensuring the submission and clearance of invoices to a digital prescribed format, for foreign exchange, customs clearance, and tax purposes
Fighting Illicit Trade	A program to assist government entities and private sector in the fight against illicit trade
Advance Cargo Information	A service to monitor import and export movements ahead of arrival at the border, allowing government authorities to anticipate and therefore accelerate cross-border controls
e-customs	Customs applications, licenses and guarantees in combination with consultancy and brokerage services facilitate the international business of economic operators This service is delivered through an international network of customs experts
TransitNet	A universal, multimodal e-customs transit guarantee service, where SGS acts as the Holder of the Procedure (HoP) for transit declarations created by our clients and submits them along with an SGS financial guarantee in favour of customs
Pre-shipment Inspection	A verification service to ensure that shipments of regulated goods comply with the prior approval requirements of the regulatory

	authority in the importing country, particularly in relation to quantity and specifications
Product Conformity Assessment (PCA)	A verification program designed to ensure that specific products meet the requirements of the technical regulations and standards set by a regulatory authority in the importing country
SGS QiiQ	A digital inspection system that allows people and government agencies and private companies to perform remote and online inspections, verification, and confirmation activities
SGS Renovo	A self-funding solution, to monitor and control the flow of Electrical and Electronic Equipment (EEE) entering a country, with transparent data collection

3. Response to consultation questions

3.1 Question

- 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?

3.2 SGS Ireland Experience

Our experience in this sector since the end of 2020 and so far year to date is that the landscape is still evolving and whether it be political, legislative or transport related data or information, it is constantly changing and the task of any organisation even one the size of SGS trying to keep track of this is very challenging. By way of example we point to the following references:

Issue: UK & European Government decisions to introduce additional COVID testing for Haulage Operators and Drivers throughout early 2021. The decision, for example taken by the French authorities to introduce a mandatory Covid-19 test for all hauliers carrying goods on ferry routes from Ireland to EU caused short-term chaos. The requirement for drivers to take rapid Antigen Tests came at very short notice and required the rapid provision of Antigen Testing centres for hauliers by the Irish government.

Impact: The haulage industry has been the key resource in keeping exports and imports on track throughout the Covid 19 Pandemic. The introduction of Antigen Testing came at a time when many hauliers and business were also struggling with Brexit related challenges and put more pressure on an already strained sector. Mandatory testing was introduced despite the EU green lanes recommendation that essential transport workers should be exempt from such tests in the interest of keeping essential supply chains running. Navigating this new landscape was a difficult task for many hauliers as there were significant communication gaps in terms of the information provided from one jurisdiction to the next.

Issue: Delay in the introduction of the SPS checks in the UK for Products of Animal Origin (POAO) and uncertainty on when this will be implemented.

Impact: There is a clear lack of awareness and preparedness particularly in the SME sector when it comes to the export or transit of POAO produce to or through the UK. Sensibly, the UK are adopting a phased approach to these new controls. However, the rules on the import of composite

products (part plants-based, part POAO) and what constitutes restricted goods will certainly cause confusion. Changing demands and shifting timetables have not helped the industry prepare for what will surely be a difficult transition.

Issue: Increased volume of traffic using direct Ferries yet no central portal for Ferry Departures /Arrivals and Cancellations.

Impact: There is strong evidence that considerable numbers of Irish hauliers have so far switched from the traditional landbridge route to the direct ferry option to avoid anticipated delays on the landbridge route. The expected disruption from queues of thousands of lorries in Kent never materialised so while direct ferries have provided hauliers and businesses with alternative options to access the EU, the landbridge is as accessible as ever in both directions allowing businesses to keep their cargo moving faster and more regularly. We understand many of the direct routes are currently at full capacity leaving hauliers with no option but to wait for the next available slot or simply hope for a cancellation. A central information/booking portal for all ferry routes (direct and indirect) would be of great benefit to the industry. It would give hauliers clear visibility on the channels available and allow for more cost effective and balanced decision making when it comes to their supply chain.

3.3 Suggestions

As regards lessons learned from the pandemic and ensuring future preparedness and resilience for this industry sector, our view is that there needs to be a centralised realtime data dashboard portal with in built alerting functionality. This portal would host realtime data on a wide range of industry specific information such as updates on restrictions to freight movement i.e. sudden or immediate changes in testing requirements, ferry cancellations, alerts and a knowledge management module to assist and guide operators and SMEs on what they need to do/know.

To support this suggestion and to demonstrate the constraints that currently exist we point to the key challenge identified by our researcher in the ²final report presented to SGS Ireland and concerns regarding the limited data available, concerns regarding its validity and accuracy and some specific issues including:

- Quarterly reporting v monthly intrastat returns
- Access to Revenue and Port agencies restricted (data or access to the agencies themselves)
- Significant data variance between EU member states data requirements, processes and reporting indicators
- Matching of sectors and values to RO-RO movements not available

In our subsequent round table discussion with industry stakeholders, academic collaborators, and a leading consultant economist on the content of the final report there was a general consensus that there is a pressing need for a Realtime Data Repository Portal for the Haulage sector. However

² Research undertaken by Steve O'Sullivan, 3S Group College of Business TU Dublin

to ensure success, credibility, and access for all relevant stakeholders it must have both State and Industry endorsement and support.

Suggestions regarding policy and support are based on the premise that we operate in the Single Market but there still needs to be greater cohesion and collaboration European wide. This sector needs to be treated as a European Wide Business with one single market. The concept of the realtime data dashboard should support this and improve alignment and integration of the systems that support trade.

4. Brexit

4.1 Question

- 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?

SGS Ireland Experience

In 2020 SGS contacted over two thousand haulage and logistics companies individually and through their respective associations regarding Brexit planning and preparations. The uncertainty of the implications of Brexit for their business was concerning. To avoid being exposed by lack of knowledge around customs procedures many companies were booking Direct Ferries to avoid the landbridge from Jan 1st. As the major operators were able to book multiple lane space this left SMEs paying premiums for whatever limited capacity was still available. We are aware of Trucks waiting for days before securing capacity on Direct Ferries incurring demurrage penalties. The guidance to avoid the landbridge as a means of direct access into the EU from Ireland has meant SMEs have lost business as lane space was booked up by the large operators and the SMEs are forced to pay premiums for the limited capacity that was still available.

There remains considerable uncertainty and stress within the industry around the future of the TCA agreement particularly around POAO goods. Clearly there are several pieces influencing this however the Sea Border and dependence of the UK as a unique market and access to the single market using the UK landbridge is a major hurdle for Ireland and Irish Hauliers within this complex scenario. The sector correctly feels exposed and abandoned to this.

4.2 Suggestions

Suggestions regarding policy and support would be based on the premise that we operate in a single market but yet there still needs to be greater cohesion and collaboration European wide. Ireland as a Member State of the EU has Sea Borders with its EU counterparts, the quickest and cheapest route to the single market for Irish businesses is through the Landbridge. This route has to be supported through a uniformed custom approach, and requirements for Irish Goods (which are EU goods) re-entering the single market through the Landbridge should be seamless. This has to happen to protect our SMEs and support Irish businesses trading in the single market. The concept of the realtime data dashboard showing accurate information for EU to EU trade including Ireland should support this as there is more alignment, consolidation and integration of the systems that support trade.

The TCA risk associated with UK divergence from EU standards is a manageable risk. It should not mean (as it currently suggests) that avoiding the UK or UK market is the solution. Systems, processes and agreed Customs and sealing procedures should allow Irish and EU hauliers to use the UK to access the single market (as they should) The risk and time delays for fresh goods are avoidable with agreed approaches. Simplified agreed customs procedures and fair and consistent approaches by fellow EU customs authorities should manage these risks fully. An example of which is French Customs approach to POAO goods (NT Traces entries required) versus Netherlands customs approach (No NT Traces entries required). As EU checks required on Irish POAO make it difficult for SMEs to deliver on time and exposes them to costs in other EU countries which they did not face pre-Brexit. An EU unified approach would be the solution

In our view, the suggestions outlined in point 2.3 above are very important in ensuring the Haulage sector can adapt, be supported and are informed to enable the sector to access key information to make business decisions as a result of Brexit and the changes that will follow within the sector.

We believe that the sector will see more consolidation of the smaller operators as SMEs face greater challenges as the sector evolves over time. These changes will favour the bigger players and see the smaller SMEs disadvantaged.

5. Environmental/Decarbonisation

5.1 Question

- 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?

5.2 SGS Suggestions

With the future changes planned within the sector with respect to environmental and decarbonisation initiatives, our view as noted in point 4.2 above, there will be consolidation across export centres as the sector changes and the structures evolve. Based on our research we know that a large proportion of the fleet are owner operators and small businesses and with the changes required to the sector and business model it is critical that there are mechanisms to support fair transition for these SMEs. It is critical that the approach adopted is calibrated against the SME Test and appropriate and proportionate to the needs of the entire sector. In this regard, we have noted the points made by Tom Ferris in his recent article on 'Ireland's SME Test and Regulatory Impact Assessment' <https://www.pai.ie/irelands-sme-test-and-regulatory-impact-assessment/>

Supports should include:

- Government Grants - should be appropriate and proportionate to the sector
- LCV's – Grants and support for Driver Sustainability Training

- Cabotage - There needs to be a concerted Europe wide effort to agree cabotage rules that are not only sensitive to each segment of the road freight market but that are also balanced by the consideration of the potential reduction in harmful emissions that cabotage could affect. *The Assessment of the impact of a provision in the context of the revision of Regulation (EC) No 1071/2009 and Regulation (EC) No 1072/2009* evaluation published by the EU takes the position that to “Change the directives on Cabotage which will lead to an increase of up to 2.5 billion vehicle kilometres by 2023 within the EU. This represents an increase of 4.8% in international road freight vehicle kilometres in 2023. The environmental impacts from the provision are directly linked to the potential increase in vehicle-kilometres. Overall, the new provision could result in up to 2.9 million tonnes of additional CO2 emissions in 2023.”

6. Labour Market/Skills

6.1 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.?

6.2 SGS Experience

In response to this question, we would point to our experience in the sector and also the output from our ³research report which highlighted significant competency gaps and skills shortage in this area along with the following issues:

- Huge skills shortage – need creative approaches to build sectoral competence.

Brexit: expected 30,000 new entrants into SCM and Logistics sector up to 2025. While there is a significant need for skills development (note our experience is that it is complex and demands significant training) many companies will avoid making investment in personnel and prefer to wait until full clarity is given to assess what capacity they need. Given the increasing demands placed on the sector it is key that supports are not only put in place for education but are also introduced to increase the attractiveness of the sector allowing for staff retention and career opportunities
- Customs Declarations: (FTA: competence shortage)
 - Revenue declarations estimated to increase from 1.6m to 20m
 - FTA: Early indications suggest that this estimation will be exceeded
- SME Sector:
 - Training in new skills across the FTDL sector (systems and processes)
 - Lack of SCM awareness needed to optimise Supply Chain Network (SCN) in present operating environment
- 350,000 Export Health Certificates to be issued per annum:
 - Additional resources and training required
- HGV drivers exiting the profession due to an average age of 55 and a displacement arising from an increasing use of unaccompanied movements
- Capacity of national customs administrations. Many customs administrations have hired new personnel to deal with the increased volume of new paperwork required post Brexit. It is again clear that most administrations are struggling to provide staff with the knowledge and practical experience that they require to work in the sector. The result has been incorrect decisions and delays which are a particular worry for those involved in the transport of time sensitive goods.

³ Research undertaken by Steve O’Sullivan, 3S Group College of Business TU Dublin

Coupled with the above and based on our own experience is the steep learning curve for this sector and the challenges presented with learning in a complex and changing environment. We have also noted the minimal training available for customs roles and also in some cases it can be overpriced based on other industry sectors.

6.3 Suggestions

In our view a key requirement for this sector is a EU wide set of skills standards with greater integration and standardisation. As the EU maps out its strategy to align its systems, so too should the standards and skills that accompany it.

As the sector also experiences a shortage of HGV drivers, this will have implications for organisations employing HGV drivers as where the local resource pool becomes smaller this will again widen the competitive gap between the larger players who have access to the wider labour market as opposed to the SMEs and local resource constraints.

7. Summary

In our response SGS has outlined some of the priority actions we feel are very relevant and should be taken into consideration in the development of the Department of Transport's 10 year strategy for the Road Haulage Sector. The overall common theme running through our suggestions and underpinning their implementation is the need to provide access to Real Time industry related data.

As supply chains have become more complex due to globalisation, expanded consumer channels, and increased government regulations, SGS emphasises the need for enhanced collaboration between all actors in providing a Real Time Data Repository Portal for the Haulage sector. The sector is a vital cog in the functioning of trade within the European single market and we need to ensure access to meaningful and trustworthy data that will allow actors within the sector to make calculated, informed decisions for their businesses.

The Departments consultation paper identifies many of the issues facing the industry; Brexit, Labour Market, Covid, and Decarbonisation. Exponential complexity growth is arguably the greatest current challenge facing the supply chain and Haulage Sector. The unprecedented challenges brought about by the COVID19 pandemic and the difficulties created by Brexit have shown how increasingly complex the sector has become.

The Department in its strategy can support the entire haulage sector by aiding in the delivery of meaningful data which will allow operators maintain control over the key decisions for their businesses. Otherwise, it will become a market dominated by specialised and high volume logistics companies, forcing out smaller operators and/or making it very difficult for SME's to maintain a viable business and operational model, the knock on effect of which will be higher transport prices and may impact trade volumes.

8. References



SGS Research Report 23-03 (002).pdf



Research Findings 23-03-21.pdf

9. Appendices

Appendix A: SGS Group

SGS is the world's leading inspection, verification, testing and certification company. SGS is recognised as the global benchmark for quality and integrity. With more than **89,000 employees**, SGS operates a network of more than **2,600 offices and laboratories** around the world.

Our core services can be divided into four categories:

- **Inspection:** our comprehensive range of world-leading inspection and verification services, such as checking the condition and weight of traded goods at transshipment, help you to control quantity and quality, and meet all relevant regulatory requirements across different regions and markets.
- **Testing:** our global network of testing facilities, staffed by knowledgeable and experienced personnel, enable you to reduce risks, shorten time to market and test the quality, safety, and performance of your products against relevant health, safety, and regulatory standards.
- **Certification:** we enable you to demonstrate that your products, processes, systems, or services are compliant with either national or international standards and regulations or customer defined standards, through certification.
- **Verification:** we ensure that products and services comply with global standards and local regulations. Combining global coverage with local knowledge, unrivalled experience, and expertise in virtually every industry, SGS covers the entire supply chain from raw materials to final consumption.

We are constantly looking beyond customers' and society's expectations in order to deliver market leading services wherever they are needed. As the leader in providing specialised business solutions that improve quality, safety and productivity and reduce risk, we help customers navigate an increasingly regulated world. Our independent services add significant value to our customers' operations and ensure business sustainability.

As well as delivering services that promote sustainable development, our values also show a commitment to corporate sustainability. For us, sustainability is about managing a long-term profitable business while considering all the positive and negative environmental, social, and economic effects we have on society.

Our Vision

We aim to be the most competitive and the most productive service organisation in the world. Our core competencies in inspection, verification, testing, and certification are being continuously improved to be best-in-class. They are at the heart of what we are. Our chosen markets are and will be solely determined by our ability to be the most competitive and to consistently deliver unequalled service to our customers all over the world.

Our Values

We seek to be characterised by our passion, integrity, entrepreneurialism, and our innovative spirit, as we continually strive to fulfil our vision. These values guide us in all that we do and are the bedrock upon which our organisation is built.

Our History

Established in 1878, SGS transformed grain trading in Europe by offering innovative agricultural inspection services. The Company was registered in Geneva as Société Générale de Surveillance in 1919. Shares were first listed on (SWX) Swiss Exchange in 1981. Since 2001, we have only one class of shares consisting of registered shares.

From our beginnings in 1878 as a grain inspection house, we have steadily grown into our role as the industry leader. We have done this through continual improvement and innovation and through supporting our customers’ operations by reducing risk and improving productivity.

From Our Structure, SGS SA is the ultimate holding company of the SGS Group including SGS SA, direct and indirect subsidiaries, and entities under its influence.



Global Network

With over 89,000 employees, SGS counts on a network of over 2,600 offices and laboratories around the world. The head office of the Group is located in Geneva, Switzerland. The unique international network of SGS-owned companies enables us to deploy our own resources in more than 140 countries and to have in each the necessary capability to deliver our services in a speedy and professional manner. SGS can therefore control the quality and consistency of its work more completely and, in so doing, better serve its customers worldwide.

Exclusive agency representation is available wherever no SGS affiliate is in place. In most cases, SGS agents' work is performed with SGS technical assistance, consisting of international teams of experts ready to be deployed.

Below you will find the global SGS coverage as January 2021.



Organisational Structure

We have implemented the next stage of our strategic evolution with the purpose of enabling a better, safer, and more interconnected world for employees, customers, shareholders, and society. Our operational structure has been simplified into six new focus areas composed of four divisions: Connectivity & Products, Health & Nutrition, Industries & Environment and Natural Resources and two cross-divisional strategic units: Knowledge and Digital & Innovation.

Connectivity & Products

Enabling better, safer products and services in a more connected world.

As the world becomes more connected, brands, manufacturers, retailers, and governments must ensure the safety, quality and regulatory conformity of their products and services. In addition, the growth of e-commerce, and the emergence of new technologies, such as 5G, Internet of Things and Artificial Intelligence, brings the challenge of more accessible, yet secure, connectivity.

We provide the world’s most comprehensive range of inspection, testing, certification, and advisory services, powered by leading technology and digital tools. Our global network of experts supports you at every stage – from design, production and regulatory compliance to the import and export of goods.

Our innovative solutions help you to deliver safe, accessible, high-quality products and services in stores and online, ensure secure connectivity, reduce risk, and build consumer trust.

Health & Nutrition

Enabling a better quality of life by assuring the quality, safety, and sustainability of the food we eat and healthcare products we use.

The health, wellness and nutrition industries are converging, responding to consumer demands for healthier lifestyles and wellbeing. As a result, there is an increased focus on the quality, safety, sustainability, authenticity and efficacy of food, healthcare, and wellness products.

We provide the world's most comprehensive range of integrated inspection, testing, certification, and advisory services, powered by the latest technology and digital tools. Our global network of experts helps you to meet increasingly complex regulations and standards in the markets you operate in.

Our services enable you to move quickly and safely through the product development cycle, ensuring efficiency, compliance, productivity, and innovation throughout the supply chain. This helps you to protect your brand and build consumer trust and loyalty.

*Industries & Environment***Enabling safer, more sustainable, and environmentally friendly infrastructure, transportation, and industries.**

As your organization transitions towards sustainable forms of energy and growing environmental responsibilities, you need to bridge the gap between current business practices and meeting the global requirements for a better future.

We provide the world's most comprehensive range of integrated inspection, testing, certification, and advisory services, powered by the latest technology and digital tools. Our global network of experts helps you to navigate a wide range of new standards, regulations, and corporate responsibilities.

Our innovative solutions enable you to ensure the integrity, safety and reliability of your activities, equipment, and operations, while helping you take more sustainable approaches to infrastructure, transportation, and business operations. This helps you to protect workers and the environment, generate customer confidence, enhance brand reputation, manage risk, and increase business efficiency.

*Natural Resources***Enabling the sustainable management and efficient use of natural resources.**

Natural resources provide the essential building blocks of economic development that are pivotal to everyday life. The agriculture, oil, gas, and minerals sectors are evolving rapidly, with an increased focus on sustainability, changing market demands, and environmental, social, and corporate governance (ESG).

We provide the world's most comprehensive range of integrated inspection, testing, certification, and advisory services, powered by the latest technology and digital tools. Our global network of experts and dedicated laboratories provide essential market intelligence and metallurgy, consulting, and logistics services to help you reduce risk, ensure traceability, and trade with integrity and trust.

Our solutions enable you to become more environmentally responsible and ensure compliance and innovation throughout the supply chain, while enhancing productivity, safety, quality, and sustainability.

Knowledge

Enabling sustainable growth by enhancing knowledge, skills, and processes.

In an increasingly globalized economy, organizations must keep up to date with complex regulatory obligations and best practices to reduce legal, financial, and reputational risks.

We provide the world's most comprehensive range of certification and business enhancement solutions, powered by the latest technology and digital tools. Our global network of specialists provides the knowledge and expertise to help you comply with local and international standards, and ensure your people have the skills, training, and professional development to help your business thrive.

Our innovative solutions enable you to manage risk across supply chains and deliver operational efficiency, cost savings and sustainability, while increasing your value to society.

Digital & Innovation

Enabling safer, fairer, and more secure access to the digital environment.

In the drive towards digital transformation, organizations are exploring innovative new technologies that will help them adapt to a new market reality, where customers demand relevant, secure content on any device, anytime, anywhere.

We provide the world's most comprehensive range of integrated inspection, testing, certification, and advisory services, powered by the latest technology and digital tools. Our global network of digital innovation centres helps you to understand and harness the latest trends in cybersecurity, Internet of Things, and eCommerce.

Our innovate solutions enable you to identify and validate new innovations, products, services, and business models to build consumer trust and operate more efficiently and securely.

SGS Network & Offices

- SGS delivers services from fixed sites such as offices, service centres and laboratories
- SGS also delivers services in the field at customer and third party sites
- SGS delivers demand for certain complex laboratory testing and specialist services from Ireland through the international network

SGS Ireland also hosts a number of Global Support Units:

- Life Science
- Corporate IT Software Delivery Centre
- Mobility (Transportation)
- Government Services

For the Connectivity and Products and Industries & Environment divisions, SGS delivers a number of significant IT operational platforms for a range of local and international clients including the Road Safety Authority, Leasing Companies across 33 countries and major automotive OEMs

- SGS operate a network of National Driving Licence Service (NDLS) centres throughout Ireland on behalf of the Road Safety Authority and associated data verification services
- SGS mobilise a road safety education programme on behalf of the Road Safety Authority. We manage the staff and planning to deliver training and education throughout workplaces, colleges, schools, and events around the country
- SGS offers a wide range of Trade Facilitation Services. Recently launched the very successful TransitNet which is a due diligence and financial guarantee service for companies trading through the UK landbridge.
- In the Minerals sector, due to SGS' experience handling drill core, in-depth knowledge of analytical requirements and proven QA/QC procedures, SGS were chosen to manage the core store for the Geological Survey Ireland. SGS' goal is to improve processes, increase organisation and optimise daily operations. SGS log and store drill core data in a consistent, digital manner for easy retrieval by GSI clients. Quantitative and qualitative analysis for the development of a national database to facilitate the development of the sector in Ireland. The services also include portside inspection and surveying services for a range of commodities including ores, fertilisers.

For Health & Nutrition, Ireland plays a pivotal role within the SGS Global Life Sciences division. The Global Business Excellence Centre was established in 2019 at Naas Headquarters and provides technology, commercial and project management support to the Global laboratory network. The Naas office is home to the Global Quality Excellence Team which oversee network compliance and global Standard Operating Procedures, training, and computer system validation.

In April 2021, SGS acquired the International Service Laboratory (ISL) at Ringaskiddy, Cork from Novartis. ISL provides analytical laboratory services and production planning for global chemical productions. ISL is a strategic centre of excellence for Pharmaceutical Substance Analytics and Reporting. It is a GMP facility has full GMP certification from the Irish health authorities (HRPA) and is US FDA registered.

Our agriculture portfolio includes our GEP field trials which cover the following categories: Acaracides, Biopesticides, Fertilizers, Fungicides, Herbicides, Insecticides, Molluscicides, Nematocides, Plant growth regulators (PGRs) and stored crops.

We provide a flexible and impartial resource that supports the screening, development, and registration of agricultural and horticultural chemicals, biopesticides, fertilizers and new plant varieties. Our facilities comply with the relevant industry-specific quality management systems for conducting regulatory efficacy studies for local, international, and global submissions and we also provide portside inspection and surveying services for a wide range of agricultural commodities.



SOLAS Response to the Public Consultation on the Proposed Ten-Year Strategy for the Haulage Sector

July 2021

Introduction and Context

SOLAS welcomes the opportunity to make a submission to the public consultation on the proposed Ten-Year Strategy for the Haulage Sector (the Strategy). As the statutory authority in Ireland for Further Education and Training, our vision is that Further Education and Training (FET) continues to be recognised for the significant contribution it makes for learners, in every community throughout Ireland and that the FET system is empowered to deliver for the future, for the evolving needs of learners, the economy and society.

Our response includes a focus on the labour market and skills aspects of the Strategy, both nationally and within the context of skills provision within the FET system, in terms of upskilling and reskilling. We also provide some commentary on Brexit related matters and potential synergies that could be further explored during the development of the Strategy.

Labour Market and National Skills Outlook

The annual SOLAS National Skills Bulletin includes a focus on *Transport and Logistics Occupations* (as one of the areas we provide analysis for). Although our 2020 bulletin was published in the context of the emerging impact of Covid-19 this edition referred primarily to the situation in the Irish labour market prior to 2020. It is important to note therefore that the 2020 report on employment outlooks by occupation are framed within the labour market in Ireland as it stood in the second half of 2020.

We are currently completing our 2021 National Skills Bulletin and therefore updated information will be available later in the year. However, our analysis to date on occupations within this sector, including on managers and directors; stock control, transport and distribution administration; truck and van drivers; mobile machine drivers and operatives and other drivers and transport operatives, present varying degrees of growth and demand as well as wider skills narrative.

For managers and directors in transport and logistics, employment grew strongly over the five-year period for this occupation, with growth particularly evident between 2018 and 2019. Both Brexit and Covid-19 are likely to impact future employment in these occupations due to travel restrictions, changes in customs regulations and consumer behaviour. While e-commerce has resulted in increased activity in this sector, the impact at occupational level is as yet unknown, and recovery will depend on the extent to which economies rebound. However, developments in technology in this sector are likely to require upskilling/reskilling for those already in these occupations.

For truck and van drivers, employment growth was above the national average over the five-year period. New employment permits issued for HGV drivers indicates that in 2019 employers were having difficulty in sourcing suitable candidates from the Irish labour supply. With 27% aged 55 years and older, replacement demand alone presents a number of job openings in the short-term. Demand for domestic truck and van drivers most likely increased due to a surge in online shopping during the Covid-19 restrictions, although those involved in international transport may have been impacted by heightened restrictions on travel.

Perhaps one of the most significant findings in terms of the future Strategy is the analysis on other drivers and transport operatives. There was no employment growth over the five years for this occupation. At 42%, this occupational group had one of the largest shares of people employed, who were aged 55 years and older. Most of these roles include taxi drivers and bus and coach drivers, each of which would have been impacted by the restrictions. The high proximity to others in their working environment poses a particular risk for this occupation. As activity continues at reduced capacity and the demand for services may remain limited, the ability to sustain operations, particularly for private companies, may likely curtail employment numbers.

We acknowledge that many of these factors are subject to the current environment, the plans for wider reopening of the economy and of society, in line with the requirements for continuing to deal with the Pandemic.

In our 2020 Vacancy Survey, we found 9% of agencies reported difficulty in recruiting roles within the Transport and Storage Sector, this included for - HGV drivers, forklift drivers, freight forwarders, buyers/planners (junior/midmanagement roles), transport managers/ engineers, warehouse operatives and customs clearance staff.

The need for ongoing research and data in terms of supply and demand is clearly key in assisting with planning of skills provision across FET and Higher for the haulage sector.

FET Skills and Strategic Opportunities

The ambitious *Further Education and Training Strategy, Future FET: Transforming Learning 2020-2024* includes the 3 key pillars of Building Skills, Fostering Inclusion and Creating Pathways. Challenges as laid out in the consultation documentation on the new Strategy for the haulage sector including in the areas of skills shortages, specific skills requirements in digitalisation and decarbonising of the sector have the potential to be addressed in part through the implementation of the FET Strategy, building on the strong FET provision foundations already in place.

Further Education and Training currently supports the haulage sector through a number of initiatives, this has the potential to expand, partly as a result of the role FET has in leading the upskilling and reskilling response to the Pandemic. In the main this will be through the National Skills to Compete Initiative, ensuring that those impacted by Covid-19 can find a pathway back into employment. Within the parameters of Skills to Compete we do recognise roles within the areas of HGV drivers, customs clearance administration and logistics as potential growth industries leading to more immediate employment opportunities.

Current FET provision includes certified training such as, the Driver Certificate in Professional Competence, Business Procurement and Supply Chain Management, Warehousing Skills, the Logistics Associate Apprenticeship and the HGV Driver

Traineeship. There is also a new apprenticeship in transport, operations and commercial driving in development, as well as significant opportunities for future FET provision in areas such as safety awareness, digital skills and green/climate skills awareness. There is ongoing engagement with ETBs, regional skills fora, industry representatives and relevant agencies such as the Road Safety Authority to review and consider future skills planning.

FET offerings now include a blend of classroom and on-line learning, together with off-site visits, engagement with industry leaders, work placements and career guidance. The FET Strategy sets out the need for clear progression pathways for all learners. Clear career pathways are needed especially for those at the lower skill levels. Progression pathways between Further Education, Apprenticeship, Traineeship and Higher Education will be key to the provision of a pipeline of talent for the future and current skills needs of the Haulage sector,

The Logistics and Supply Chain Skills Group set up as a direct response to a recommendation from the Expert Group on Future Skills Needs report '*Addressing the Demand for Skills in the Freight Transport, Distribution and Logistics Sector in Ireland 2015-2020*' raised the following issues with respect to skills development – promotion of apprenticeship and traineeship, CPD, industry mentoring, curriculum meeting industry needs, soft skills, digital skills, and research. The FET Sector is actively progressing each of those issues through the implementation of the Further Education and Training Strategy 2020 – 2024.

Technological advancements have already been made in the haulage industry, in-cab technology such as computer assisted support of vehicle drivers as well as track and trace systems are routinely used by drivers in the industry. The digital skills offering can support the technological changes and automation of processes which will be needed by the haulage industry as the economy recovers. It is predicted that transport of the future will be cleaner, electric, highly automated, and digital. The further education and training system in Ireland is evolving fast and is equipped to respond to the changing skill requirements of the haulage sector in a fast and flexible fashion.

Skills to Advance is the policy framework in further education and training for employee development, targeting both employers and employees. It enables targeted support for vulnerable groups in the Irish workforce – including those with lower skills levels, those in older age cohorts, those working in lower skilled jobs or sectors vulnerable to economic displacement.

Skills to Advance is delivered by Education and Training Boards (ETBs) and is a key mechanism to meet upskilling and reskilling needs. High quality training, developed in conjunction with the haulage sector, can underpin the attraction and retention of talent to service the demand for skills over the coming years. Skills to Advance requires ETBs to innovate to build relationships, work in partnership with, and systematically involve employers in the planning, design, and delivery of relevant FET provision.

A successful example of developing training solutions in close collaboration with the haulage sector has been tested and developed under the Innovation through Collaboration Fund, a competitive funding mechanism to develop innovative FET provision under Skills to Advance. Mayo Sligo Leitrim ETB have led on the 'Driving Success with Technology/SMART Driving' project, in partnership with Waterford

Wexford ETB and the Irish Road Haulage Association. This programme addresses the sectors need for more environmentally efficient, and safer, driving.

The *SMART Driving* training programme is an innovative initiative that provides essential training on vehicle and roadcraft to HGV drivers. The 3-day programme monitors driver behaviour and uses information to teach driver techniques to improve fuel efficiency and road safety. By improving drivers' awareness of their driving style and how these impacts on vehicle efficiency, drivers learn skills to increase fuel efficiency and lower carbon emissions.

Drivers also learn advanced driving skills to anticipate the behaviour of less-skilled road users and recognise and respond to road conditions. Using this knowledge, drivers will learn the skills to anticipate and avoid incidents.

Mayo Sligo Leitrim ETB has also led on the creation of a new QQI award at level 5 on the NFQ, with those completing the programme achieving a Certificate in Digital Assisted Eco Driving (HGV) which is now available to all ETBs across Ireland.

We are also working closely with the Road Safety Authority to support their initiative to develop 'Driving for Work' standards. The development of such standards will seek to improve the quality of life of commercial drivers and ensure greater focus on safe and environmentally aware driving into the future. By linking these standards to the traineeships and other FET courses identified above, this should help to make the haulage industry a more attractive proposition for those considering their career options.

It is also important that the approach to testing and assessment by the RSA is aligned with FET provision to develop skills and generate a pipeline of new talent into the industry. The move to an individual online booking system has constrained the ability for ETBs to coordinate or block book tests for trainees and learners and it is important that this facility is re-introduced to allow for efficient planning of courses and throughput of potential future employees in the haulage industry.

Conclusion

There are significant opportunities to explore in terms of skills and innovation that SOLAS and the FET system can support in the development of the proposed Ten-Year Strategy for the Haulage Sector. In addition to our commentary above, there is also potential synergy with this work in the context of the developing SOLAS Green Skills Action Programme, which is a component of the National Recovery and Resilience Plan for Ireland.

In addition, given our role as members of the Expert Group on Future Skills Needs and activities relative to this, including the pending study into the low carbon economy, we feel there may be further scope to advise on elements of the future strategy.

In overall terms we hope our response highlights the potential to strengthen existing initiatives in FET as well as outlines areas for future consideration. We would be happy to engage further on any aspects of the response and provide any additional detail.



South Coast
YOUR OPTIMAL SOLUTION PROVIDER

Department of Transport,
Leeson Lane
Dublin 2
D02 HC42

July 2021

RE: Ten-Year Haulage Strategy

South Coast Logistics very much welcome the opportunity to contribute to the publication of the Ten-year Strategy for the Haulage Sector First Consultation Document. Below we offer our observations covering the area of private logistics services chain.

A 10-year strategy for the haulage sector is very welcome at this juncture as it coincides with the importance that the industry portrayed through the pandemic in keeping Ireland Inc operating with the lights on

While our submission may not provide answers to all the questions posed in the consultation document, we will endeavour to contribute to a few we feel are important.

Many thanks.

The South Coast Team

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South Coast

YOUR OPTIMAL SOLUTION PROVIDER

Ireland's Haulage Fleet:

Licensing and Self-Regulation

To fully capture the entire industry and ensure all regulations are adhered to and convenient to police we advocate for the introduction of an operator licencing for the own account sector.

While we understand that it the responsibility is the Department of Transport to review this policy (which we support), South Coast Logistics believe that this burden should not be entirely on the Department of Transport without assistance from the industry.

We therefore advocate that all operators, be they for hire or reward or own account be a member of either the Freight Transport Association of Ireland or The Road Haulage Association. Within these Association the members must reach and adhere to certain criteria, codes of conduct and targets. Similar to Irish Medical Council, The Pharmaceutical Society of Ireland or The Law Society of Ireland, the Transport industry should be in part if not fully self-regulating. Once the actual operator adheres to standards and is audited annually their licence is granted for the coming year. In summary if all operators were fearful that their licence to operate might be revoked if they did not adhere to standards agreed by the Department of Transport and annually audited by Freight Transport Association of Ireland or The Road Haulage Association, the industry would be highly efficient.

While the advent of Traffic Commissioners is being muted, this is again ties the industry up into a quasi-court structure like structure when this can easily be done by the both or a single body. The key here is that the Associations above are turned from being a lobbying type organisation to protectors of the industry by carrying out periodic compliance audits to ensure that operators are meeting all their requirements as detailed in the operator licence application in respect to place of business, parking facilities for HGVs, financial standing and good repute.

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South Coast

YOUR OPTIMAL SOLUTION PROVIDER

Making Road Freight Transport Cleaner; The Environment:

Depots:

While there is huge emphasis placed on vehicle emission, one aspect that is being missed is that of operator's depots; the lack of and if they exist, their condition.

In the UK no HGV is allowed park on the side of the road or in a village (see below). All HGV vehicles must operate and be based at a depot. In short no driver gets their HGV home at night or at the weekends to park in the housing estate, village or on the side of the road. This practice is a huge silent Environmental Polluter.

One litre of Oil can contaminate 1million litres of Ground Water. There are no Class 1 Interceptors on the side of the roads or in villages. All HGV's should be based at depots that have suitable interceptors that will prevent or minimise pollution. South Coast would advocate that this practice is eradicated so that the environment is protected for future generations.



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South Coast

YOUR OPTIMAL SOLUTION PROVIDER

Making Road Freight Transport Safer; Enforcement:

RSA / An Garda Síochána:

The current situation that prevails is reliant on the RSA Inspector indicating to a member of An Garda Síochána attached to Road Policing Units that a vehicle is defective. The RSA have been a radical and very much now accepted change. One which was not welcomed by the industry, one that was badly needed and one which is now one that is accepted as part of the industry. It is now time to take the RSA to the next level. This is doubling up of resources from the Gardai and the RSA could be streamlined. Similar to VOSA in the UK the RSA could be given limited powers which it comes to commercial vehicles on the public road. This would not eliminate An Garda Síochána but free them up immensely.

Labour Market & Skills:

Driver Shortage

The shortage of HCV drivers in Ireland, and indeed across Europe, has been well documented. The influx of new drivers is now non-existent as other more affluent jobs avenues are taken up by young people. At present four countries outside of the EU/EEA are covered by mutual recognition agreements for CE/C1E driving licences – South Africa, Australia, Japan and South Korea. 3 of these countries are quite affluent and therefore we would all agree that we have never met a HGV driver from Australia, Japan and South Korea! The department and industry need to target countries that have unemployment or a labour supply that can support the industry. The list of countries covered by mutual recognition agreements for CE/C1E driving licences should be extended to include countries where there is clear evidence that Ireland has appealed to their residents as a working destination for other trades e.g., the Philippines and India.

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Submission to Department of Transport

Re: Public Consultation on Ten-year Strategy for the Haulage Sector

The South East Regional Skills Forum (SERSF) has worked closely with the transport and distribution sector and in particular with road haulage companies over the past four years.

SUMMARY

The 29 week **‘Professional HGV Traineeship’** developed by Waterford Wexford Education & Training Board (WWETB) has the potential to address much of the training needs for HGV drivers in Ireland.

Over a 20 month period (July 2018 – February 2020) WWETB trained approx. 118 HGV Drivers.

During the same period other ETBs started to deliver the programme – approx 60 driver trained.

The capacity exists with the ETBs to train 150-200 drivers annually via this traineeship model.

SUPPORTING INFORMATION

The South East has approx. 7,000 – 8,000 persons employed in transport and logistics.

In 2018 the Irish Road Hauliers Association (IRHA) approached the SERSF seeking a solution to the significant skills shortages they were experiencing in ‘Heavy Good Vehicle’ (HGV) drivers. After some analysis of the need and engagement with Waterford Wexford ETB a ‘Professional HGV Driver’ Traineeship was developed. This was piloted in 2018. This programme is delivered full time over 29 weeks including placement with a sponsoring employer. The industry feedback was overwhelmingly positive.

Between 2018 and March 2020 WWETB trained approx. 118 HGV Drivers. Training was suspended due to Covid in 2020 and has recently recommenced. In

the same period the Irish road Hauliers have worked with a number of Education and Training Boards to deliver this programme.

The 'Professional HGV Traineeship' that WWETB developed in 2018 and has subsequently be replicated in

- Cavan Monaghan ETB,
- Laois Offaly ETB,
- Mayo Sligo Leitrim ETB
- Donegal ETB.
- There is also interest from Kilkenny Carlow ETB, Tipperary ETB, Limerick Clare ETB, Kildare Wicklow ETB, Galway Roscommon ETB and Louth Meath ETB and possibly more.

The problem with skills shortages that the industry currently has is that many non-national drivers left the country during the pandemic and the 'traineeship' was suspended, so no new drivers have been trained for the past 15+ months. It is now up and running again.

A recent survey of members by the Irish Road Hauliers Association (IRHA) revealed 181 driver vacancies across 31 transport companies. The Professional HGV (Heavy Goods Vehicle) Traineeship is resuming across many ETBs and has the potential to address this skills shortage.

Note also that the IRHA is working with ETBs around the country to support courses by offering work placement for participants. This link is seen as crucial to securing employment for participants.

Ireland's Education & Training Boards have the capacity to address the current shortage of professional HGV drivers in Ireland. The jobs of offer are highly skilled and well rewarded.

Edmond Connolly

Manager

South East Regional Skills Forum

1st July 2021

Waterford Wexford Training Services

PROFESSIONAL HGV Training Programme

This is a
29 Week Course

Developed in conjunction with the Irish Road Haulage Association

➔ Background to the Programme

Waterford Wexford Training Services, part of WWETB, launched the Professional HGV Driving Programme on June 25 in Wexford Town. The programme was developed in conjunction with the IRHA with the purpose of increasing standards within the Industry.

The programme is funded under the SOLAS Traineeship scheme (Shaping skills, building careers) and is accredited by City and Guilds. The Accredited element of the programme is based around the competencies demonstrated by the learners during the 8-week work experience built into this course; this includes assessed competencies for areas such as route planning, food safety, health & safety and customer service.

Courses starting in
Waterford & Wexford in 2019



www.fetchcourses.ie



051 301500



recruit@wwetb.ie

PROFESSIONAL HGV Training Programme

Developed in conjunction with the Irish Road Haulage Association

Description

The aim of the course is to provide learners with the skills and related knowledge in the rules of the road, driving a heavy goods vehicle - rigid and artic body, care and maintenance of the vehicle, loading and unloading the vehicle, customer care and documentation and to develop personal effectiveness and job seeking skills.

Learner Entry Requirements

A full current Category B Driving Licence and Irish learner permit Category C is a minimum requirement.

Next Courses

Courses starting in Waterford & Wexford in 2019.

Course Modules

- INDUCTION
- MANUAL HANDLING AND FIRE SAFETY
- SAFEPASS
- ADR DRIVER TRAINING
- DRIVER CPC TRAINING
- DRIVING HGV RIGID BODY
- DRIVING HGV ARTICULATED BODY
- ROUTE PLANNING
- CUSTOMER SERVICE IN LOGISTICS
- HGV DRIVER WALK AROUND CHECKLIST
- DIGITAL TACHOGRAPH
- FOOD SAFETY IN LOGISTICS
- HEALTH, SAFETY & SECURITY IN LOGISTICS
- INTRODUCTION TO WAREHOUSING
- RTITB COUNTERBALANCE FORKLIFT TRUCK OPERATOR
- RTITB REACH TRUCK OPERATOR
- RTITB POWER PALLET TRUCK AND TAIL LIFT OPERATIONS
- RTITB VEHICLE MOUNTED LIFT TRUCK (MOFFET)
- CAREER PLANNING AND JOB SEEKING SKILLS
- IRU – LOAD SECURING
- WORK PLACEMENT COMPETENCY SCHEDULE
- FIRST AID RESPONDER

Course Certification

On successful completion of this course a City & Guilds Accredited Professional HGV Training Programme Certificate will be awarded.

- SAFEPASS
- DRIVER CPC
- DRIVING HGV RIGID – CATEGORY C
- DRIVING ARTIC BODY - CATEGORY CE
- PHECC FIRST AID RESPONDER
- RTITB REACH FORK LIFT TRUCK DRIVING OPERATOR
- RTITB VEHICLE MOUNTED LIFT TRUCK (MOFFET)
- ADR DRIVER TRAINING
- DIGITAL TACHOGRAPH
- RTITB COUNTERBALANCE FORKLIFT TRUCK DRIVING OPERATOR
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Road Transport Freight Policy Division,
Department of Transport,
Leeson Lane,
Dublin 2.

16th July 2021

**Re: Submission to the Draft Ten-Year Strategy for the Haulage Sector
SRA File Ref: 21/GD003**

A Chara,

The SRA welcome the opportunity to contribute to this consultation on the development of a 10 Year Strategy for the Haulage Sector.

As an export island economy, improved access, safer and guaranteed journey times between urban nodes, ports and airports for our trade is vital to our economic competitiveness. The ability to service future population and employment growth in our Region through sustainable freight, delivery and services is also vital to our progress.

This submission supports the development of a 10-Year Strategy for the Haulage Sector and the Department's goal to develop a strategy focusing on generating efficiencies, improving standards, creating employment and assisting the sector transition effectively to a low-carbon future. These priorities align with the Regional Spatial and Economic Strategy for the Southern Region (RSES) published in January 2020.

Through the RSES Strategy Statements¹ of Enhanced Regional Accessibility, Sustainable Mobility, High-Quality International Connectivity and a Low Carbon Climate Resilient Society, the SRA seek investment for strengthened multi-modal connectivity in our Region for the efficient movement of people and goods.

The RSES supports effective land use and transport planning integration to transition our Region to higher levels of sustainable mobility, strengthening and protecting our strategic road networks for essential economic lifelines and public transport movement and investment in our rail network as a strategic asset which can be optimised for freight movement.

Further, the RSES seeks the transition of transportation fleets (private, public, commercial) to lower carbon fuels, electrification (electric vehicles and rail) and deployment of lower carbon fueling facilities along our strategic transport corridors to decarbonise the transport sector.

This consultation is also timely as, through our RSES implementation, the SRA is progressing the development of separate but inter-related Freight, Ports and Harbours and Airport Strategies in consultation with the Department, transport agencies and key asset holders.

¹ 11 RSES Strategy Statements at page 24 of RSES.

The SRA will also be progressing a Regional Decarbonisation Plan which will address decarbonisation in the transport sector.

These strategies are currently at the scoping stage with stakeholders including divisions of the Department of Transport. The findings from consultation on the 10-Year National Haulage Strategy will benefit this work. The SRA will welcome the opportunity to stay engaged with the Department across our initiatives under these themes.

The implementation of the 10-Year Strategy for the Haulage Sector is also important to the work of the SRA in ensuring the delivery of investment through the European Regional Development Fund co-financed programmes, including the 2021-2027 programme for the Southern and Eastern & Midland Regions which the Southern Regional Assembly are responsible for managing.

This programme will focus on smart cities and a smart region, lower carbon emissions, climate resilience and urban regeneration, themes that align with the goals of the 10 Year Strategy for the Haulage Sector.

Our recommendations align with other past and recent consultations on transport for our Region including the National Investment Framework for Transport in Ireland (NIFTI) and National Development Plan Review. Other examples include the Rail Consolidation Strategy, National Rail Freight Strategy, Sustainable Mobility Policy Review, Connect Ireland Rural Mobility Plan and the on-going preparation and implementation of Metropolitan Area Transport Strategies for Cork, Limerick-Shannon and Waterford and Local Transport Plans in our Region.

Our submission is structured as follows:

- Section 1.0 Context of the RSES.
- Section 2.0 Decarbonisation of Transport
- Section 3.0 Regional Connectivity
- Section 4.0 Regional and International Connectivity of Freight
- Section 5.0 Intermodal Transport
- Section 6.0 Metropolitan Transport Plans and Local Transport Plans
- Section 7.0 Intelligent Transport Systems

1.0 Context of the RSES

The Region's priorities for investment are identified in the RSES and Metropolitan Area Strategic Plans (MASPs) for Cork, Limerick-Shannon and Waterford which came into effect on the 31st January 2020.

In line with the National Planning Framework (NPF) and the National Development Plan (NDP), they set a 12-year statutory strategic planning and economic development framework for future economic, spatial, and social development of Southern Region to become one of Europe's most "**Creative and Innovative**", "**Liveable**" and "**Greenest**" Regions.

The Southern Region has the State's most significant proposition to achieve the aim of Regional Parity. The NPF and RSES targets our three cities to grow by over 50% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions.

By 2040, the population of the Region is projected to rise to almost two million, requiring new homes and jobs. RSES Appendix 1, page 347 sets out Local Authority population projections to 2031, which combined deliver a projected uplift between 280,000 to 343,500 in the Region to 2031. These are extremely ambitious targets which have never been accomplished in the State's history. Their achievement requires a structure change in the scale and nature of

investment to the Regions and the Metropolitan Areas of Cork, Limerick- Shannon, Waterford and Galway.

The scale of population growth targeted for each of the region's cities and their metropolitan areas is significant. 50-60% growth beyond 2016 population to 2040 is targeted. The RSES and MASPs set a framework for the sustainable growth of Cork by over additional 104,600 persons to 2031 (75,000 of which is in the city and suburbs). Growth for Limerick Shannon is targeted at over 45,132 additional persons (35,247 in the city and suburbs) in the same period. Growth for Waterford is targeted at over 21,900 additional persons to 2031 (20,700 in the city and suburbs).

The settlement strategy builds on the Region's three cities and metropolitan areas of Cork, Limerick -Shannon and Waterford as engines of growth supported by a network of 14 strategically located Key Towns namely Kilkenny, Ennis, Carlow, Tralee, Wexford, Clonmel, Killarney, Mallow, Nenagh, Thurles, Newcastle West, Clonakilty, Dungarvan and Gorey.

Regeneration and growth across our Region's Cities, Key Towns and further through its network of towns, villages and rural communities are supported to build an economically resilient, competitive and growing region.

Achieving such ambitious targets will require an equally ambitious alignment in funding priorities and service delivery. Transport infrastructure, integration between different transport modes (road and rail) and a strong haulage sector is fundamental to service the Region's growth.

References to the final published RSES and the MASP for Cork, Limerick-Shannon and Waterford can be obtained through <http://www.southernassembly.ie/regional-planning/rses>

Section 2.0 Decarbonisation of Transport

The SRA welcome the emphasis in the consultation document on the urgent need for the sector to transition to new vehicle technology and lower carbon fuels in a context where the movement of goods by road remains the second biggest source of transport emissions after private car use and where, 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 and at an even steeper rate in Ireland.

Aligned with the transition to EU climate neutrality by 2050 and the European Green Deal, the RSES seeks initiatives that will achieve the decarbonisation of the transport sector. This will require effective land use and transport planning integration, achievement of compact growth and a shift to more sustainable means of freight and logistics transport including an increased role for rail freight.

Decarbonising transport will also focus on alternative and low emission fuels for freight vehicles, modal shift to rail freight and increased electrification of freight transport. Regional Policy Objectives (RPOs) seek deployment and use of clean generated electricity, bio-gas, hydrogen and other non-fossil fuels for private and public transportation and provision of a wider network of clean energy and lower carbon fueling station facilities by 2030.

Under RSES RPO 90 Regional Decarbonisation, all initiatives for meeting national obligations to decarbonise the transport sector shall be addressed through a Regional Decarbonisation Plan.

The SRA support the Strategy's pursuit of other demand policies and tools which are needed in tandem with infrastructure provision, especially in areas such as fiscal incentives to make

greener technology more affordable, accessible and viable for business in our transition to a lower carbon economy.

The Department's actions under the Low Emissions Vehicle Taskforce and other initiatives for greater take up across alternative fuels and electric vehicles are such examples. Actions from such initiatives can inform the 10-Year Haulage Strategy with specific measures to assist the sector access and optimise new technology and cleaner fuels.

Recommendation No 1: Decarbonisation in the Transport Sector

- The 10 Year Strategy for the Haulage Sector can support a greater level of ambition in actions in the deployment of zero or lower-emitting alternative vehicle technologies and clean energy fueling station infrastructure with an emphasis on greening the freight sector to meet our national commitments under the National Climate Action Plan and the EU's New Green Deal.
- In particular, the strategy should prioritise implementation of actions under the DTTAS National Policy Framework for Alternative Fuels Infrastructure for Transport 2017-2030 and Low Emissions Vehicle Taskforce.
- In addition to the provision of infrastructure and facilities, the Department should integrate with other Departments the opportunities of fiscal incentives that reward the commercial sector for transitioning to low carbon technologies and ensure that such technologies and fuels are affordable and accessible to commercial operators.
- The Department, through the implementation of the strategy, will be a key stakeholder for the SRA in the future development and implementation of a Regional Decarbonisation Plan. Future collaboration on the beneficial cross over between both our initiatives will be welcomed.

This recommendation aligns with and achieves RSES RPOs 90, 91, 93, 139.

Section 3.0 Regional Connectivity

In alignment with the consultation document discussion on the need to deliver strategic national and regional infrastructure, including key projects through the NDP and the National Investment Framework for Transport in Ireland (NIFTI), the SRA concur that investment in national and regional road corridors remains an important consideration, both for steady state maintenance and new improved corridors.

The NPF, NDP and RSES in turn has identified strategic road corridor improvements, especially improved corridors connecting our cities and Tier 1 and Tier 2 Ports. In larger urban areas, strategic road investment for orbital routes can facilitate a more efficient separation of economic and HGV movements, reduce congestion in the urban cores to improve the public realm, interchange facilities and active travel and allow new bus corridors to be established.

These projects, identified in co-ordination with the NTA and TII with additional regional priorities through the RSES process, are at different stages of the assessment, design and planning, but all need to be supported and progressed to underpin transport infrastructure led economic growth, particularly as enablers of compact sustainable growth and for freight, delivery and servicing of our Region's population and economy.

Recommendation No 2: Enhance Road Networks and Public Transport Corridors

- The 10 Year Strategy for the Haulage Sector can support investment through the NDP, RSES, MASPs and transport authorities that enhance the Region's strategic road networks and public transport corridors that connect the Region's Cities and Metropolitan Areas, Ports and Airports, Economic Corridors and Key Towns.

- Capital investment in the steady state maintenance and enhancement of road networks deliver for sustainable transport, economic resilience, freight distribution and supply chains.
- Investment in the road networks also enable transformative urban regeneration in city and town centres, allowing new traffic management solutions to unlock large scale brownfield sites for regeneration, re-directing the through movement of freight from densely populated areas.
- Aligned with this recommendation, Recommendation 3 and 4 below support increased integration between road and rail for freight movement as part of our Region's strengthened multi-modal transport networks between urban nodes, ports and airports.

This recommendation aligns with and achieves RSES RPOs 140, 141, 156, 158, 166-168, 171, 172, Cork MASP Objective 9, Limerick-Shannon MASP Objective 8, and Waterford MASP Objective 7.

Section 4.0 Regional and International Connectivity of Freight

Improved regional connectivity, road and rail, for moving people and goods between our Region's economic drivers and international connectivity gateways of ports and airports on safe, efficient networks with guaranteed journey times is essential for our economic competitiveness and resilience.

This includes the movement and distribution of logistics between our cities and metropolitan areas of Cork, Limerick-Shannon and Waterford, the Atlantic Economic Corridor, the Eastern Economic Corridor and between our Tier 1 and Tier 2 Port assets (Ports of Cork, Shannon-Foynes, Waterford-Belview and Rosslare Europort), National Airports (Cork and Shannon) and Regional Airports (Kerry and Waterford).

These ports and airports are individual and a combined strength for our State's international connectivity and economic growth, with a key role for EU, UK, and international trade post Brexit. Optimising the capacity of these assets for economic competitiveness advances Regional Parity and provides a counterbalance to pressures on Dublin's infrastructure.

Completion of the EU TEN-T multi-modal Core and Comprehensive Networks through our Region, in addition to the transport projects identified through the RSES, MASPs, Metropolitan Transport Strategies and Local Transport Plans which will develop freight and passenger distribution networks within and around our urban nodes and to and from our international transport gateways, require strong support.

Through RSES RPOs 141 Regional Freight Strategy, RPO 145 Ports and Harbour Strategy for the Southern Region, RPO 149 Airport Strategy for the Southern Region and RPO 90 Regional Decarbonisation, the SRA are in the process of defining the scope and role of these strategies to inform a strengthening of national policy and the development of actions by the relevant departments and agencies for a resilient and greener future in these sectors from the perspective of regional stakeholders.

Recommendation No 3: Regional and International Connectivity of Freight

- The 10 Year Strategy for the Haulage Sector can support the capacity and collective strength of our port and harbour assets and airport assets in the Regions for the economic competitiveness of our State by completing the TEN-T Core and Comprehensive Networks and strengthening sustainable multi-modal (road and rail) networks for freight and passenger mobility between ports, airports and urban nodes.

- The Department, through the implementation of this strategy will be a key stakeholder for the SRA in the development and implementation Regional Freight, Ports and Harbours and Airport Strategies under our RSES priorities for strengthened Regional Connectivity and strengthened International Connectivity (RPOs 141, 145 and 149). The SRA are currently engaging with divisions of the Department of Transport and transport authorities (TII and NTA) on the scope and role of these strategies. Future collaboration on the beneficial cross over between both our initiatives will be welcomed.

This recommendation aligns with RSES RPOs 140, 141, 145, 156, 158, 166-168, 171, 172, Cork MASP Objective 9, Limerick-Shannon MASP Objective 8, and Waterford MASP Objective 7.

Section 5.0 Intermodal Transport

The SRA supports the consultation document's inclusion of support for greater use of rail in freight distribution. As noted by the Department, rail freight is still a minor player in the overall current freight market in Ireland despite the reach of our rail network but it is in a good position to compete with the large volume and the bulk movement of goods and a growing market for environmentally efficient ways of managing their supply chain.

Aligned with the EU's Sustainable and Smart Mobility Strategy for rail freight traffic within the EU to increase by 50% by 2030 and double by 2050, the RSES supports our rail networks as key corridors for sustainable movement of people and goods into the future.

The RSES has identified a greater role for our rail network through:

- Enhanced role of rail corridors for movement of people and freight.
- Align transportation planning with spatial land use planning to optimise access to public transport, especially rail stations.
- For an economically competitive region, we need to modernise our rail infrastructure, guarantee and reduce journey times, especially between each of the four cities and metropolitan areas outside of Dublin as well as to Dublin.
- The scope for electrification needs to be pursued.
- There is an urgent need to transition public transport fleets to lower carbon fuel sources.
- The role of multi-modal travel chains received significant focus for greater transition to sustainable travel. For freight, this includes the integration of freight distribution centres road and rail for transitioning freight between different mode and vehicle types. The development of a National Freight Strategy supported by Regional Freight Strategies and (can be addressed in turn at the local level through the relevant City and County Development Plans, Metropolitan Transport Strategies and Local Transport Plans) can assist planning and delivering freight road and rail interchange facilities.
- Optimise rail freight between urban nodes and ports in the Southern Region. Limerick Junction for example is an important regional asset connecting the Dublin, Cork, Limerick and Waterford rail corridors with potential extensions to the western rail corridor (a link between the Atlantic Economic Corridor and Eastern Corridor). There is potential to re-instate the Limerick-Foynes Freight Line. At the Port of Cork site of Marino Point, there is an opportunity to optimise the rail connection with deep water wharf facilities and port/marine industries. There is potential to strengthen freight and logistics networks at both Rosslare Europort and Port of Waterford Belview.

- Support the role of rail networks in the successful implementation of economic corridors and urban networks across the region, connecting settlements and strategic employment locations.

Recommendation No 4: Maintain, Enhance and Extend Rail Infrastructure for Strengthened Intermodal Transport

- The 10 Year Strategy for the Haulage Sector can support capital investment to maintain, improve and extend the existing rail network of the Regions.
- Specific investments should target inter-city rail and the potential for electrification of rail for higher speeds and efficient journey times between our cities, key towns and along economic corridors (the Atlantic Economic Corridor, Eastern Economic Corridor and east-west connection between the two along the existing road and rail network) and target specific opportunities for rail-based freight distribution.
- Investment is required to develop multi-modal interchange with rail, transitioning the fleets to renewable or low carbon sources, and improving the passenger facilities and services.
- The strategy can support, through the development of a Regional Freight Strategy under RSES RPO 141, the feasibility of delivering a national freight and passenger hub in the Southern Region, reinstatement of freight lines on our Region's rail network and integrating road and rail freight transport modes. Future collaboration between both our initiatives under the theme of intermodal transport will be welcomed.
- The priorities that emerge through the strategy for intermodal freight transport should be integrated with the Department's other recent and on-going initiatives including the recent Rail Consolidation Strategy and National Rail Freight Strategy on which the SRA were a stakeholder consultee.

This recommendation aligns with and achieves RSES RPOs 91, 140, 141, 160-166, 170, Cork MASP Objective 7 & 8, Limerick MASP Objective 7, and Waterford MASP Objective 6

Section 6.0 Metropolitan Transport Plans and Local Transport Plans

Metropolitan Transport Strategies

The SRA support the references to Metropolitan Transport Strategies in the consultation document. The scale of challenge to transition travel to sustainable modes in cities and metropolitan areas in the context of high growth is significant. The RSES and MASPs highlight that 2016 travel patterns are dominated by private car which leads to congestion on the strategic road network, impacting on supply chains and guaranteed journey times for essential freight, delivery and services between urban nodes, ports and airports.

Transport investment, with a focus on sustainable travel between our cities along with sustainable and active travel within our cities and metropolitan area for daily activities, is a key enabler for each city and metropolitan area. Investment is urgently needed to transition travel patterns to public transport and active modes across cities and metropolitan areas.

The RSES specifically identifies transport investment priorities under all transport modes to be addressed by a metropolitan transport strategy for Cork, Limerick-Shannon and Waterford.

Each MASP in turn integrates specific objectives for integrated land use and transport planning, sustainable transport and investment under the metropolitan transport strategies. Progress by the NTA, TII, Local Authorities and stakeholders (which include the SRA) is positive with the Cork Metropolitan Transport Strategy completed and at implementation stage, the Limerick-Shannon Metropolitan Transport Strategy at draft stage and the Waterford

Metropolitan Strategy at pre-draft preparation stage with stakeholders (including the Regional Assembly).

Each metropolitan transport strategy addresses sustainable freight management, recognising that to meet projected growth, increased levels of freight, delivery and services through HGVs will be generated. At city and town level, there will be a greater level of delivery and servicing activity.

Example of overarching objectives for the management of freight include:

- Re-directing the through movement of freight from densely populated areas and unsuitable local roads to the strategic road network;
- Examining the feasibility of consolidation centres and break-bulk facilities outside of the national road network in the medium term, to facilitate smaller lower emission vehicles delivering to town and city centres;
- Ensuring that delivery, servicing and waste management trips are made as green and quiet as possible using zero or low emission vehicles where appropriate; and
- Examine the case for urban or micro-consolidation to reduce the number of last mile trips being made by motorised vehicles e.g examining the case for cargo bikes or small electric vans delivering to restaurants and shops etc.

From the regional perspective, the preparation, implementation and follow through investment in delivering metropolitan transport strategies which include measures to address freight, delivery and servicing management cannot be over-stated. For the regions to succeed, our cities and metropolitan areas must be prioritised for investment in transport infrastructure projects.

Recommendation No 5: Implement Metropolitan Transport Strategies

- The 10 Year Strategy for the Haulage Sector can support the National Transport Authority, Transport Infrastructure Ireland, Local Authorities and other stakeholders in the preparation and implementation of Metropolitan Area Transport Strategies which are transformative game changers for sustainable transport infrastructure led planning. Funding packages specific to each city and metropolitan area, aligned to the infrastructure projects and delivery of short term, medium term and longer-term transport priorities including priorities for sustainable and effective freight, delivery and services management need to be supported.

This recommendation aligns with and achieves RSES RPOs 160-165, 170, 171, 174, Cork MASP Objective 7 & 8, Limerick MASP Objective 7, and Waterford MASP Objective 6.

Local Transport Plans

Local Transport Plans (LTPs) are an objective of the RSES. They are an important framework for transport investment, integration of land use and transport planning and transition to sustainable mobility for towns and rural areas across our Regions.

LTP's will be prepared by the NTA in co-ordination with TII, Local Authorities and other stakeholders (including the SRA) for Key Towns and other large settlements across our Region.

LTPs will maximise the delivery of sustainable and active travel infrastructure and importantly, will also plan for the efficient and sustainable movement of people, goods and services at settlement level.

Currently in our Region, a LTP for Kilkenny is at draft preparation stage and when completed, it will set a high-quality benchmark for what LTP's should address and implement. This process should be highlighted as a good practice case study when completed.

Recommendation No 6: Implement Local Transport Plans

- The 10 Year Strategy for the Haulage Sector can support the NTA, TII, Local Authorities and other stakeholders in the preparation and implementation of Local Transport Plans (LTPs). Funding packages specific to each town and plan area, aligned to the infrastructure projects and short term, medium term and longer-term priorities including priorities for sustainable and effective freight, delivery and services management identified in LTPs should be supported.

This recommendation aligns with and achieves RSES RPOs 11, 12-25, 157 and 160-163.

Section 7.0 Intelligent Transport Systems

The SRA support the consultation document's emphasis on the role of smart technology to achieve our objectives for lower carbon transport and the EU's Green Deal support for increased digitalisation and use of data in the sector and management of our transport networks.

The consultation document highlights innovation in areas such as Connected, Co-operative and Automated/Autonomous mobility (CCAM) and an Irish pilot in co-operative intelligent transport systems (C-ITS).

The RSES is aligned in its support for innovation in the transport sector and promotes the "Smart City" concept which envisages that digital technology is embedded across all city functions as a platform to solve complex challenges. It involves systematic integration of information and communication technologies (ICT) in planning, design, operations and management of public services including transport.

Smarter mobility across all transport sectors, including freight, delivery and services, will be a key pillar of a Smarter Region. The RSES seeks to build on initiatives offered from the concept of "Smart Cities", with the view of extending such activities to other towns, villages and rural areas across the region, thereby developing a wider "Smart Region".

To support the development of a "Smart Region", investment in digital infrastructures, research and innovation, new technologies, the sharing of data and integration of services (public and private operators) for multi-modal transport ecosystems (such as Mobility as a Service systems) will be important and will benefit freight, deliveries and services, especially for servicing our compact urban centres in a more sustainable way.

Our Region is a leader in research, development and testing of Connected and Autonomous Vehicles and smart transport infrastructure, the Future Mobility Campus Ireland in Shannon is a positive example of our opportunity to be a world leader in developing this technology for the future of lower carbon smarter transport (<https://futuremobilityireland.ie>).

The strategy should support continued investment for innovation and partnerships between public, private and research sectors for testing and deploying such technologies region wide.

The SRA, under RSES RPO 134 Smart Cities and Smart Region and the EU Interreg Europe Cohes3ion Project <http://www.southernassembly.ie/eu-projects/COHES3ION>, are currently developing a framework to assist in the development and implementation of Smart City and Smart Region initiatives and projects under a number of themes, including smarter transport, in our Region. The SRA will welcome future collaboration with the Department on the development of our framework as it progresses.

Recommendation No 7: Smart Mobility

- The 10 Year Strategy for the Haulage Sector can support smart mobility as a key attribute of Smart Cities and a Smart Region and support investment and public private sector collaborations with centres of research and development (such as the Future Mobility Campus Ireland in Shannon) in the testing and deployment of Connected and Autonomous and smarter transport infrastructure region wide. Such innovation will benefit smarter freight, delivery and services, especially in the sustainable lower carbon distribution of goods and services.
- The strategy should support a systematic integration of ICT in the planning, design, operations, and management of transport services of the Region's settlements. Investment should leverage intelligent low carbon e-mobility and Mobility as a Service Systems.
- The Department, through the implementation of the 10 Year Strategy for the Haulage Sector will be a key stakeholder for the SRA in the implementation of a Smart Region Framework under RSES RPO 134 and the Interreg Europe Cohes3ion project. Smart transport infrastructure and services will be a key pillar of a Smart Region with benefits to lower carbon freight, deliveries and services. Future collaboration on the beneficial cross over between both our initiatives will be welcomed.

This recommendation aligns with and achieves RSES RPOs 134, 157, 160-164, Cork MASP Objective 7 & 8, Limerick MASP Objective 7, and Waterford MASP Objective 6.

Conclusion

The SRA welcome this consultation opportunity with the Department of Transport and are a committed stakeholder and key consultee for the Department in the final development and implementation of the 10-Year Strategy for the Haulage Sector.

The objectives of the RSES and MASPS for Cork, Limerick-Shannon and Waterford align with the priorities and goals for this strategy, as demonstrated in our submission and recommendations.

Continued engagement between the SRA and the Department of Transport on this and other initiatives will be encouraged and welcomed, especially as the goals of the 10 Year Strategy for the Haulage Sector are aligned with our current work on RSES implementation through the development of Freight, Ports and Harbours and Airport Strategies, Regional Decarbonisation Plan and frameworks to develop the Southern Region as a Smart Region (with smart transport as a key pillar).

I trust the above recommendations can be taken on board to help strengthen the final strategy from the Region's perspective. The SRA would welcome the opportunity to engage with the Department of Transport on these recommendations and are available for future consultation and clarities as required.

Mise le meas,



David Kelly,
Director

Transport Infrastructure Ireland’s response to the Department of Transport Haulage Consultation

16th July 2021

Responses to specific questions posed by DoT:

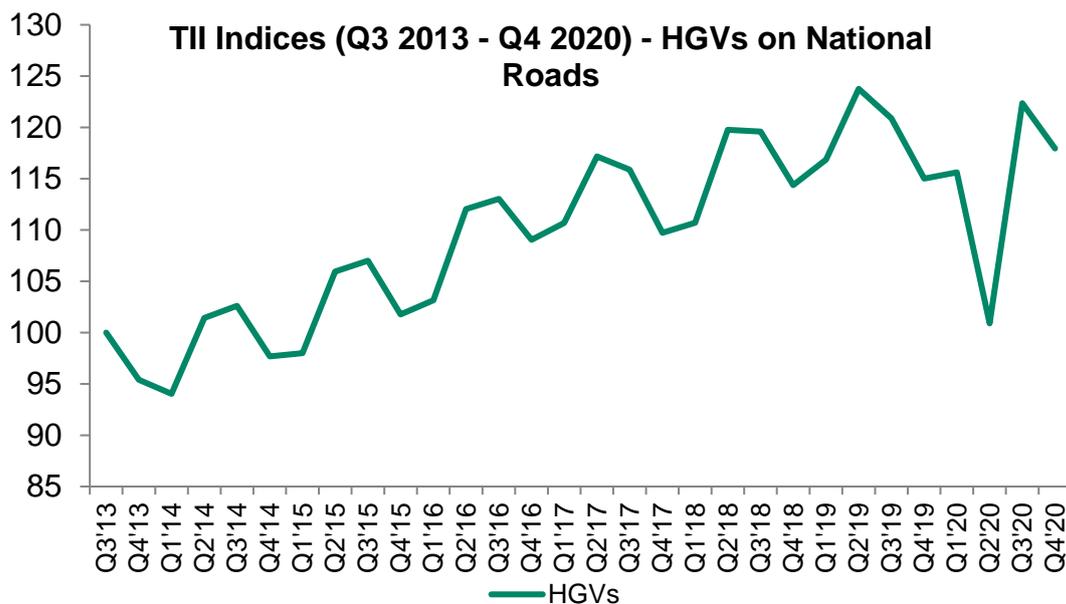
1. COVID-19

2. 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?

Data from TII’s extensive network of traffic counters proved very important for TII and many government agencies and departments during the Covid crisis.

When considering the lessons learnt from the COVID-19 pandemic for freight, it is useful to review TII HGVS growth indices developed from TII traffic count data. These indices give insight into changes in the amount of HGVS travel on the National Road Network since 2013. The effect COVID-19 had on HGVS traffic on the National Road network in 2020 is shown in Figure 1.1.

Fig 1.1 HGVS Indices on the National Road Network



Source: TII, 2021

As travel restrictions were put in place for most of 2020, when compared to 2019, there was an overall drop in HGV traffic of 4%. In Q2 2020 there was a temporary reduction in HGV volumes of 19% compared to the equivalent period in 2019. However, in Q3 as restrictions were eased there was a rapid recovery and freight traffic on the National Road network increased by approximately 6% relative to 2019. This shows the capacity of the sector to bounce back rapidly. The response also reflected growth in deliveries to homes as consumers bought an increasing amount of goods online. This highlights that the freight sector was not as affected by COVID-19 as were many other industries and that the sector is resilient to such challenges. However, hauliers and transport companies exposed to the construction, hotel supply, leisure and entertainment sectors would have faced business challenges.

The pandemic highlighted the importance of the national road network as a core piece of critical infrastructure supporting and maintaining the economic health of the country and maintaining connectivity and facilitating continued distribution of goods.

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

In response to the COVID-19 pandemic the temporary parking zone at Dublin airport was converted to a COVID-19 Antigen testing lab. Policy support that facilitates agile and flexible responses to a challenging and rapidly changing situation, involving different sectors and public and semi-state bodies, is welcome.

Cross agency data sharing and collaboration should be reinvigorated.

In the region of 90% of road freight nationally is carried on national roads. The importance of the national road network in carriage of freight and not just movement of people should be borne in mind by all policymakers.

Covid-19: Key points TII

- Movement of goods was resilient to Covid crisis. Total HGV traffic for 2020 was only 4% less than 2019. Policy can recognize the increasing importance of the national road network in carriage of freight and not just movement of people. I
- In the region of 90% of road freight nationally is carried on national roads. The importance of the national road network in carriage of freight and not just movement of people should be borne in mind by all policymakers
- Importance of traffic data, including freight data, in understanding critical role that National Roads infrastructure played for goods carriage before and during crisis. Requirement for different agencies to collaborate further. Reinvigorate cross agency data sharing and collaboration.
- There is benefit in public sector being ready and responsive to crises. Policy support facilitating agile and flexible responses to a crisis is welcome.

2. Brexit

1. What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?

Brexit and its effects have necessitated a re-evaluation of the Trans European Network – Transport (TEN-T) in Ireland. Ireland was already a part of the North Sea-Mediterranean Corridor, but as a consequence of Brexit there was a realignment of these areas and Ireland was added to the Atlantic Corridor. This increasingly aligns Ireland’s TEN-T with ports in France, Belgium and the Netherlands. Coupled with this, new ferry routes have begun to operate outside of Dublin. It will be important to maintain international connectivity from Dublin/Cork/Rosslare Ports to mainland European ports as use of the UK land-bridge reduces. If over time there is a significant increase in HGV and general traffic volumes at these ports, planning priority on infrastructure enhancement could be a consideration. In this context, improved road infrastructure at these ports could help ease the transition, as Ireland adapts to a post-Brexit trade relationship with Europe. Hauliers will benefit from the planned M28 Cork to Ringaskiddy project.

2. How does the sector see the EU-UK relationship in road haulage under the Trade and Cooperation Agreement (TCA) evolving over time?

No comment

Brexit: Key points TII

- High quality international connectivity to ports and connections to mainland European ports are increasingly important as use of UK land-bridge reduces.
- It is important to protect access to Dublin Port and improve access to Port of Cork and other ports in the South-East.

3. Environmental Regulation, Sustainability and Decarbonisation

1. What is needed to incentivize the take-up and usage of a greater number of less polluting HGVs?

The Alternatively Fueled Heavy-Duty Vehicle Purchase Grant Scheme, administered by TII on behalf of DoT, awards grants to assist companies and enterprises who wish to buy new alternatively fueled heavy-duty vehicles supported by the Scheme (AFHDVs) as opposed to the diesel equivalent. A continuation of this scheme would be a positive step for further incentivization of the take-up of less polluting HGVs.

TII welcomes any freight fuel measures that reduce carbon and improve air quality. Measures could include road-user charging, scrappage incentives or public body contracts that require use of cleaner vehicles.

Ireland's National Energy & Climate Plan, published in July 2020, emphasised the key role green hydrogen could play in Ireland's transition to a low carbon economy and society. Hydrogen is one of the most promising decarbonisation options for trucks, buses, ships, trains, large cars, and commercial vehicles and TII would support moves to hydrogen through provision of appropriate infrastructure

2. What is needed to incentivize less polluting Light Commercial Vehicles (LCVs)?

This light vehicle sector has been growing to support trends in on-line shopping, home delivery and a successful construction sector. In 2019, 25,300 new units of LCVs were registered in Ireland, with a similar number recorded in 2018. These vehicles do less mileage per year than HGVs and there is consequently less incentive for renewal of their fleet. Related to this there are many older vehicles in the fleet with poorer vehicle emission standards.

The introduction of a charging mechanism, tied to emissions, could be a disincentive to the use of these older vehicles. For example, such a mechanism will be introduced in Manchester, UK, which is likely to see a daily fee of £10/day from 2023 for non-Euro 6 LCVs anywhere in Greater Manchester.

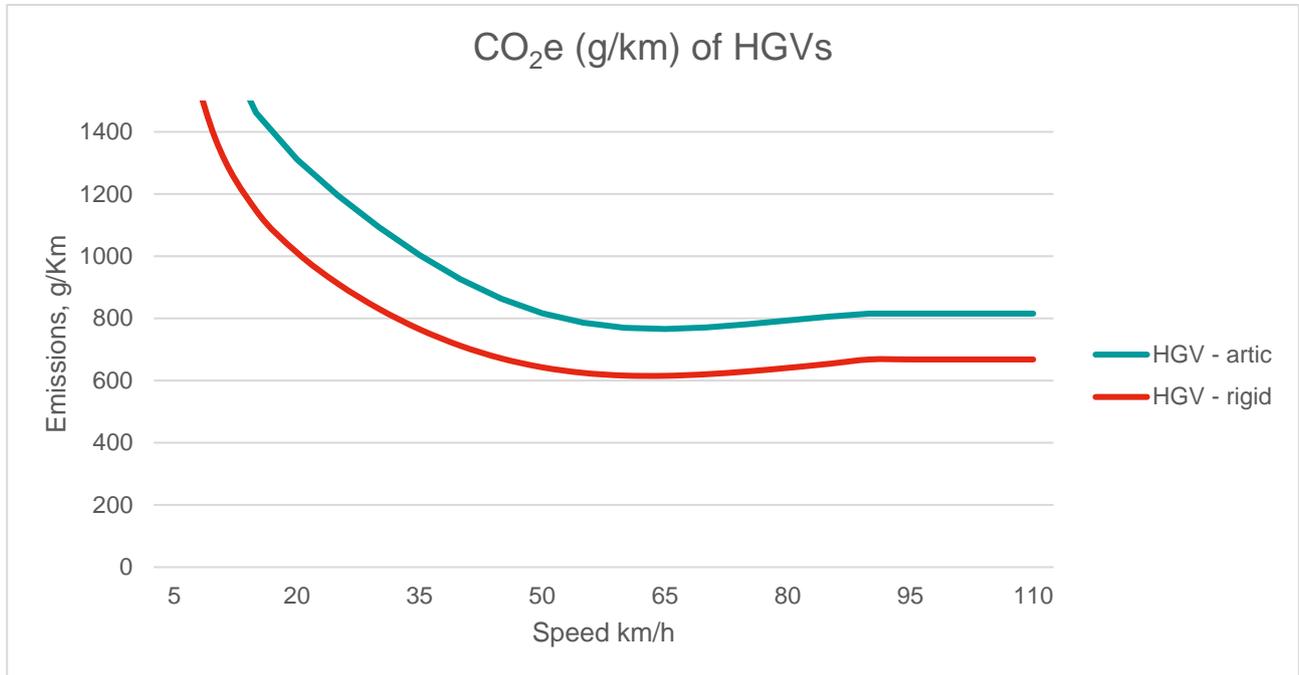
A scrappage scheme, especially if scrappage were related to the acquisition of an electric or alternatively fueled vehicle, could be used to incentivize the use of Light Commercial Vehicles. Public bodies could also incentivize less polluting Light Commercial Vehicles through the use of contractual clauses necessitating the use of low emission vehicles by any of their contractors.

3. Should eco-driver training be rolled out further, for example, as part of Driver CPC training?

Eco-driver training is shown to have a positive effect especially in the immediate period post training. One of the best-known courses over the last 20 years was SAFED, (Safe and Fuel-Efficient Driving) and some training schools still offer this course. There is a range of Driver CPC courses, and it is logical that eco-driving is one of them. Driver CPC courses do not have to be limited to being in a classroom and increasingly they are interactive and can involve in-vehicle tuition.

Transport bodies also have a role to play in facilitating eco-driving through optimizing conditions for eco-driving on road networks. TII is supportive of Eco driving and will strive to create road conditions that facilitate Eco driving – e.g., delivery of eMOS project on M50. With eMOS, TII seeks to reduce flow breakdown through the use of variable speed limits, provision of traffic/congestion information, reduced variability in journey time and better lane distribution. Congestion and low speeds result in higher emissions from HGVs, as shown below.

Figure 3.1 Speed and Emissions relation for HGVs



Source: AECOM, 2021

4. Would more consolidation/distribution centres assist in better management and distribution of goods within Ireland?

The logistics sector has traditionally run groupage operations – grouping of multiple customer’s products, usually when they are less than a full load quantity, into viable loads. This is an essential part of the business which allows part loads to be delivered relatively cheaply when compared to running the consignment individually.

European grants have supported Consolidation Centre (CC) projects in several EU towns and cities. Some have been successful, but others have either stopped or required public sector grants to continue. Some consolidation centres are compulsory to use such as the scheme at London’s Heathrow Airport, while others are dedicated for individual shopping centres such as Meadowhall in Sheffield. The CC in Bristol that serves both the city and Bath and although originally EU and local public sector funded, it is now run commercially by DHL.

An impressive example is in Vaxjo, Sweden, where there is buy-in from the public and private sector. All schools use a common procurement method with their deliveries routed via a consolidation centre and ultimately delivered to the schools using a last mile urban friendly truck. Many retail outlets and offices also use the service, reducing the number of HGVs in the pedestrian and cycle friendly city. There is merit in further investigating this best practice across Europe.

An example within Ireland is the An Post distribution centre. It is strategically placed in Portlaoise, as it allows quick access onto the National Road Network and is strategically placed between large population centres of Dublin, Cork and Limerick.

TII supports the use of consolidation centres and any other measures that can keep heavy commercial traffic on the national road network and away from urban streets.

TII believes that there may be merit in the creation of transport infrastructure in the form of four Transport Hubs adjacent to the national road network outside of Dublin, Cork, Limerick and Galway. These hubs would

facilitate the unloading of HGVs and the onward distribution of the goods in lighter ideally electric vehicles within the urban areas. These hubs could be of significant size (60 to 100 acres) and the proposed model is that vacated cold-storage city centre facilities are relocated to these outlying facilities. The attraction to the businesses is that they vacate their existing sites of high value which are closer to the city centre. Value released could be used by the private operators to fund construction of more energy efficient buildings in these designated hubs. The vacated sites in turn could be redesignated for other purposes appropriate for a liveable city centre. Many cities in Europe and the UK operate facilities of this nature and have banned heavy vehicles from the central city area. This would contribute to more efficient use of vehicles, a safer road environment for active travel and better air quality in urban areas.

5. 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.

The logistics industry is an increasingly sophisticated sector and has been investing in technology systems such as in-vehicle telematics, automation in vehicle scheduling and routing and staff ICT training. However, margins are tight in the haulage industry, and this limits the amount SMEs can afford to invest. Nevertheless, there is scope to increase the efficiency of how vehicles are used within their supply chains through changes in behaviour and operations.

The amount of empty running on the roads of Ireland could be reduced by wider adoption of internet-based load matching. This is where companies advertise loads or spare capacity and then offer these to other participating transport companies. The market leader in Europe is Timocom, but there are several others who trade thousands of loads a day across many countries.

There are various vehicle trials going on across Europe looking at trucks carrying more without generating extra congestion. Some of these include the use of “longer semi-trailers” in the UK where slightly longer trailers with rear-steer axles can carry 4 extra pallets without going beyond the 44 Tonne weight limit. In Holland and Sweden heavier vehicles are allowed on certain trunk routes. However, TII would caution that carriage of heavier loads per axle would likely have a detrimental impact on road pavements. The safety impacts of carrying increased loads and/or the use of higher vehicles would also have to be carefully considered.

The wider acceptance of night operations and facilitating 24-hour deliveries could bring efficiencies as transport networks are uncongested for portions of the day. However, the benefits derived from such proposals would have to be balanced with the work/life balance needs of drivers.

Environmental Regulation, Sustainability and Decarbonisation: Key points TII

- Incentivise cleaner fuels – TII welcomes any freight fuel measures that reduce carbon and improve air quality. Measures could include road-user charging, scrappage incentives or public body contracts that require use of cleaner vehicles. TII would support moves to hydrogen through provision of appropriate infrastructure
- TII is supportive of Eco driving and will strive to create road conditions that facilitate Eco driving – e.g., delivery of eMOS project on M50.
- Congestion and low speeds result in higher emissions from HGVs. TII wishes to address HGV congestion and low speeds to reduce emissions.
- Consolidation centres (CC) can keep heavier commercial traffic on national roads away from urban streets.

- TII would caution that carriage of heavier loads per axle would likely have a detrimental impact on road pavements. The safety impacts of carrying increased loads and/or the use of higher vehicles would also have to be carefully considered.
- TII believes that there may be merit in the creation of transport infrastructure in the form of four Redistribution Hubs adjacent to Dublin, Cork, Limerick and Galway. This would contribute to more efficient use of vehicles, a safer road environment for active travel and better air quality in urban areas.

4. Road Safety Regulation

1. What are the road safety priorities in road haulage for the next 10 years?

There was an increase in walking and cycling during the period of COVID restrictions in 2020. However, there was also a significant increase in cyclist and pedestrian fatalities. Given the increased numbers now engaging in active travel, and the increased policy support for this area, the road haulage sector and policymakers need to be mindful of the increased risks to cyclists and pedestrians.

The presence of HGVs in busy towns generates collision risks, particularly for vulnerable road users. The Dublin Tunnel plays a vital role in keeping HGVs out of the core Dublin city area. The five-axle ban in Dublin city centre was introduced after the opening of the tunnel and this has led to a safer environment for cyclists and pedestrians in Dublin City Centre. Similarly, many HGVs could be removed from towns throughout Ireland through provision of town bypasses. TII supports the use of bypasses coupled with restrictions on heavy vehicular access in towns.

TII supports further strengthening the enforcement of weight limits and increased management/regulation of vehicles carrying abnormal loads, building upon the permit system for the movement of abnormal loads administered by the RSA. An expansion in the deployment of in-road weigh in motion and other measures are worth consideration.

2. How are these priorities best addressed?

Continued investment and upgrading of protected pedestrian and cycling facilities along or adjacent to the National Road networks would help protect vulnerable road users.

Provision of town bypass infrastructure, coupled with removal of trucks from towns, addresses the priority of reducing collision/injury risk to pedestrians and cyclists. On bypass roads carrying a large number of HGVs, however, there could be a risk of occurrence of head-on collisions arising from cars trying to overtake slow-moving trucks. Provision of dual carriageway cross-sections would eliminate head-on collisions for this context.

Further deployment of in-road weigh-in-motion technology could reduce the numbers of incorrectly loaded HGVs and contribute to improving road safety.

3. What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?

Fatalities on Irish roads reduced when the extensive motorway network was introduced. However continual efforts must be made to reduce road accidents. Encouraging HGV drivers to make further use of safe and protected Motorway Service Areas could prevent driver fatigue and reduce related accidents.

What could be done to help operators to comply with road safety regulation and to reduce the regulatory burden, particularly for smaller operators?

No comment

4. Do you have any other comments on road safety matters?

In recent decades the EU limited the working hours of HGV drivers. This has been a key element in protecting the working conditions of drivers and all road users' safety. Drivers of light goods vehicles (LGVs) are not subject to the same restrictions on driver hours. There is merit in reviewing the number of serious and fatal LGV accidents and exploring the accident causal factors.

Road Safety Regulation: Key points TII

- The Road haulage sector needs to be mindful of the increased risks to vulnerable road users due to increased amount of active travel. Development and upgrading of protected pedestrian and cycling facilities along or adjacent to the National Roads will improve safety for vulnerable road users.
- The Dublin Tunnel plays a vital role in keeping HGVs out of Dublin city. Many HGVs can be removed from towns through further provision of bypasses. On bypass roads carrying a large number of HGVs provision of dual carriageway cross-sections would eliminate head-on collisions.
- TII supports further strengthening the enforcement of weight limits and increased management/regulation of vehicles carrying abnormal loads. Expanding the deployment of in-road weigh in motion technology could reduce the numbers of incorrectly loaded HGVs and contribute to improving road safety. This measure could also reduce premature damage to road pavements and infrastructure.
- Encouraging HGV drivers to make further use of safe and protected Motorway Service Areas could prevent onset of driver fatigue and reduce fatigue related accidents.
- Light goods vehicles (LGVs) and their drivers are not subject to restrictions on driver hours. There is merit in reviewing the number of serious and fatal LGV accidents and exploring the accident causal factors.

5. EU Road Transport Policy (Mobility Package)

1. What are your views on how Ireland implements the Mobility Package changes?

As discussed previously, Driver's Hours Regulations have done much to improve safety standards across Europe. The intention to include drivers of 2.5 tonne to 3.5 tonne light goods vehicles, albeit on international hire and reward work, is another step in the right direction. Businesses operating vans grossing at 2.5 tonnes and above will have to hold an O-licence and comply with its requirements. Up to now these small vehicles were broadly unregulated and some operators may have demanded unreasonable requirements of their drivers. Although the introduction of new regulations may cause some transport companies to use a greater number of small vans (<2.5 tonnes) to circumvent the rules, there are lesser economies of scale with smaller vehicles and hence overall the introduction of legislation should yield positive benefits.

2. What are your views on the return on the truck?

No Comment

6. Road Infrastructure

1. Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?

The road haulage sector needs a safe, reliable network with regularly sited re-fueling and rest facilities. TII has provided six motorway services areas on the motorway network which include secure rest areas. The private sector has also responded and delivered service areas providing valued additional secure rest areas. TII is currently working on an update to its Service Area Policy, and this will identify any outstanding gaps in provision of service areas on the motorway network.

All stakeholders in the transport sector recognize the need to promote the efficient movement of both people and goods. It is important to consider these twin objectives when developing policy or proposing road interventions. The impact on the haulage sector of public transport initiatives that include reallocation of existing shared road-space to bus-only, is unclear. Haulage plays an extremely important role for the economy and society, and it is important that this is taken into consideration when formulating future road-space prioritization proposals. For instance, 'no car lanes' rather than 'bus-only' lanes, on Motorways and certain designated roads, could simultaneously support the efficient movement of both goods and people.

2. What more is needed in relation to road user charging for freight transport in Ireland?

There is currently no specific approved policy or strategy on road user charging in Ireland although a more concrete policy could emerge from the current draft of the Department of Transport's forthcoming land transport investment framework. TII notes that user charging is firmly embedded in EU policy and regulation regarding "polluter pays" and "user pays" principles. There is also no current policy direction issued to TII to plan or prepare for additional tolling / user charging. TII's current investigations into potential road user charging relate to managing the transition of public-private-partnership funded sections of the national motorway network returning to public ownership between 2032 and 2052 and the need to fund the maintenance and operation of those assets.

Heavy goods vehicles, regardless of their motive power, generate significant maintenance requirements on the national road network. However, to date TII is unaware of any public road network globally that charges tolls or user charges on trucks that reflect the maintenance cost arising from that use. Light vehicles are far more numerous but are responsible for far less pavement wear. This is, therefore, a significant consideration in the design of any RUC system in ensuring that it can fully support the operation and maintenance of the network. It is important that there is clear alignment between road user charging as a funding policy and mechanism and road user charging as a demand management policy and mechanism to achieve the desired financial and environmental benefits. It is also important that there is clear alignment between any shorter-term measures and the longer-term direction set out in any future program for government. RUC can offset the operations and maintenance cost of the motorway network, but as it is such an effective tool there will inevitably be calls upon it to also be used to support other government directions. To determine the application of RUC and where it would bring the greatest benefits there are a range of trade-offs that any RUC might need to consider, including but not exclusively:

- a. Whether the operations and maintenance costs of the road network is to be recovered or is RUC to achieve wider policy goals.

- b. Discounts for emissions, if successful, will reduce the income inflow as more HGVs become eligible, so financial reliance on such a RUC needs to factor income variables as additional policy goals are added.
- c. RUC on heavy vehicles flows through to the wider economy as an inflationary measure, and so any pricing strategy needs to align with wider policy aims around constraining inflation.
- d. RUC on HGVs could be very effective in changing the time of day of travel for some types of goods, but detailed studies are required to understand the extent of change that can be achieved, and what complementary changes in the supply chain are required to maximize benefits.
- e. For government, public and industry acceptance on RUC to be overcome, clarity on the benefits and the achievement of policy agendas, such as decarbonization, need to be transparent and well-articulated.
- f. The cost of introducing a RUC is significant, it would be a national scheme and would require regulation, legislation, capital investment by government and may need the implementation of technology in every vehicle and these early costs need to be factored into income scenarios.
- g. RUC comes in many shapes and applications and aligning the system design and solution to the preferred policy outcomes is important.

TII is of the opinion that the following needs require Government consideration and determination:

- The objective(s) of a heavy vehicle RUC
- The objective(s) of a heavy vehicle RUC in priority order in order to be able to test options.
- The extent of application of the RUC having regard to the national road network
- If the desire is to have only an HGV RUC or a system wide RUC to achieve its objectives as there are considerable effects from either decision.
- Determine with the HGV sector what it would expect from a RUC that was to meet those previously noted objectives and what the transition program would need to be to ensure that a supported implementation was achievable.
- The relationship between the suite of existing user charges as they relate to HGVs and conclude whether RUC becomes a replacement charge, a partial replacement charge or a new charge (with attendant benefits)
- The technology path to ensure for the 5 per cent of HGV traffic that is international whether there is a single integration scheme Europe wide, or whether it is a domestic system with a capability to integrate into a future European system.

Further to these decisions and determinations, test scenarios and options will be required to fully understand the economy wide and geographically and sector specific effects to find the best-fit for the objective.

In preparation for understanding the shift in income and expenditure profile that the returning PPP assets would deliver to TII, TII first undertook a relatively basic financial review. In doing so, this identified the need for the type of wider considerations identified above, as TII understands it cannot be a lone actor in a complex policy environment. However, it is a good starting point to understand what might be possible with charging across the asset portfolio within TII's sphere of control and that research has commenced, in discussion with the Department of Transport.

TII continues to build its understanding of the costs arising from the expiry of the existing PPPs along with the types of investments that will be needed to decarbonize the network, to integrate public and active transport

links with the network and the expected changes in communications and digital networks to support emerging technologies.

Road Infrastructure: Key points TII

- The road haulage sector needs a safe, reliable network with regularly sited re-fueling and rest facilities. TII is currently working on an update to its Service Area Policy which will identify any outstanding gaps in provision of service areas on the motorway network.
- It is important to consider the promotion of efficient movement of both people and goods when developing policy or proposing road interventions. Impacts on haulage should be taken into consideration when re-allocating existing road-space.
- TII notes that user charging is firmly embedded in EU policy and regulation regarding “polluter pays” and “user pays” principles. There are many possible benefits from Road User Charging schemes and TII would welcome further policy direction in this area.

7. Labour Market and Skills

- 1. 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.**

No Comment

- 2. How can the perception of roles in the haulage or logistics and supply chain sectors be enhanced?**

No Comment

- 3. 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?**

No Comment

8. Intermodal Transport

- 4. Is freight transport being taken into account sufficiently within Ireland’s integrated transport planning system, particularly the various transport strategies for urban areas?**

Passenger transport may be receiving more priority over freight transport. However, freight transport is of

vital importance to the economy - as both Brexit and COVID have shown, it is essential for the economy and the welfare of our citizens that goods movement is planned for properly.

It is important that freight transport is considered when planning transport systems. This is of particular relevance for the national road network which carries in the region of 90% of national freight traffic. There may be a need to assign responsibilities for freight matters to an existing or future agency.

5. 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?

No Comment

6. Where do you think an increase in rail infrastructure or capacity could best benefit the road freight sector?

TII supports any shift in carriage of goods from road to rail. Rail freight has a 17% market share of inland goods movements across the EU. Rail freight is growing in several European countries, mainly in the movement of construction/bulk materials and intermodal boxes. A shift to rail could reduce road HGV traffic. Furthermore, human resource requirements for carriage of goods can be lessened. For example, one train driver can move 1,000 tonnes in a day compared to an HGV driver that might move 25 tonnes.

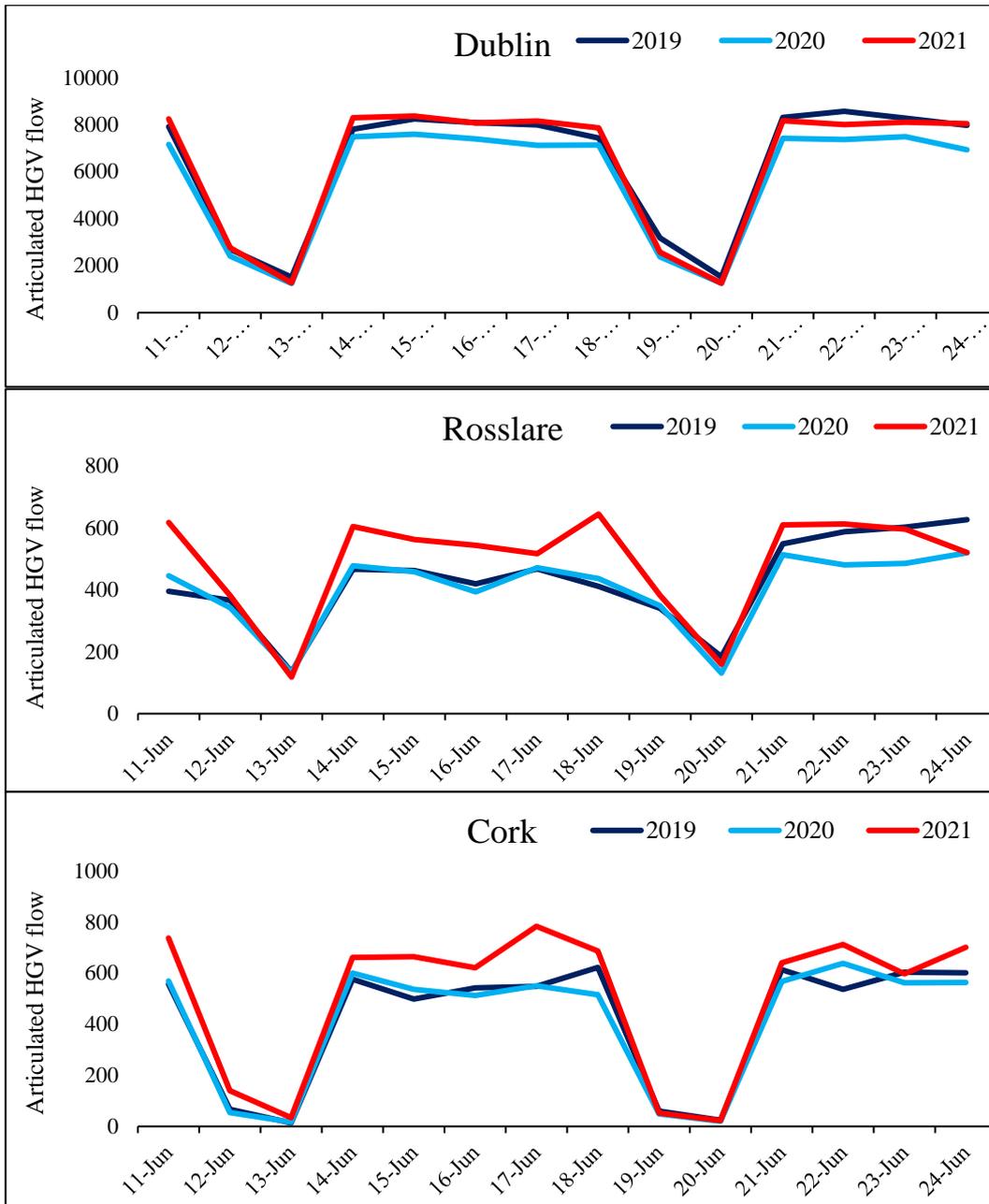
7. What are the barriers which prevent movement of freight by rail?

Improvements to the national road network in Ireland in recent decades, particularly the presence of a high performing motorway network, have yielded benefits for the road haulage industry. This contributes to the road mode being increasingly competitive. The “first and last mile” and associated interchange costs create challenges for feasibility of carriage of freight by rail. It should be recognized that our island situation and the relatively short distances that freight would travel are factors that make the Irish rail freight context different to the mainland European rail freight context. Nonetheless there still may be scope for transferring some road freight to rail and any such shift to rail is supported by TII.

8. What further action is needed to improve the hinterland connectivity of Ireland’s ports and airports, particularly in light of Brexit?

Having good road and rail links to Dublin, Rosslare, Cork, Waterford and Foynes ports is important. Removal of bottlenecks on routes to key ports/airports is required to maintain and improve journey time reliability to these international connections. The M28 Cork to Ringaskiddy motorway will facilitate efficient carriage of freight to/from Ringaskiddy.

Figure 7.1 Daily Heavy Goods Vehicles at Ports



Similarly having good rail and road connections to international airports aids connectivity. Although the aviation sector has been particularly negatively affected by COVID, cargo operations have been more resilient. Recently, the movement of vaccines and PPE (personal protective equipment) by air has been vital. The N17 Knock to Collooney project, which is in its early phases, is an example. This will provide enhanced regional accessibility and also access to international markets via Ireland West Airport Knock. For a more progressed example, the N22 Macroom to Ballyvourney project is at construction and implementation phase. This is a key route in the South-West region and acts as a major connection to Cork Airport and Kerry.

Another key consideration is resilience of transport infrastructure that serves ports and airports. Dublin Tunnel, as shown in Figure 7.1, facilitates access to Dublin Port. Provision of an alternative surface-based port access route, to be used in the event of short or long-term unavailability of Dublin Tunnel, should be an objective for all stakeholders.

Intermodal Transport: Key points TII

- TII considers that freight deserves more attention beyond Ten-T regulations, and it is hoped that this haulage strategy will address this gap. Freight transport is of vital importance for the economy and society. And as both Brexit and COVID have shown, it is essential for the economy and the welfare of our citizens that the efficient movement of goods is facilitated and maintained.
- It is important that freight transport is considered when planning transport systems. This is of particular relevance for the national road network which carries in the region of 90% of national freight traffic. There may be a need to assign responsibilities for freight matters to an existing or future agency.
- The current HGV ban in Dublin works well. TII supports removal of HGVs from large urban centres and the carriage of these vehicles on national roads.
- TII is supportive of carriage of freight by rail. The “first and last mile” and associated interchange costs create challenges for feasibility of carriage of freight by rail.
- Removal of bottlenecks on routes to key ports/airports is required to maintain and improve journey time reliability for international connectivity.
- Provision of an alternative surface-based Dublin Port access route, to be used in the event of short or long-term unavailability of Dublin Tunnel, should be an objective for all stakeholders.

Background

UPS is one of the world's largest logistics companies, playing a vital role in the collection, warehouse and delivery of goods as well as having the world's largest in-house customs brokerage operations. Our current operations in Ireland includes over 1,200 employees (543,000 globally) across 20 facilities.

UPS welcomes the publication of the Ten-year Strategy for the Haulage Sector First Consultation Document and believes this is key to supporting the sector in both the short and long term.

Covid/Brexit

Over the past year, the Covid crisis has highlighted the importance of logistics and the supply chain remaining unrestricted in order to ensure critical medical equipment, supplies and PPE are able to get to where they are needed most, as well as to enable businesses to continue trading and consumers to stay home and still receive groceries and other goods. Brexit has brought additional challenges in how business is done across the border into Northern and with the UK as a whole.

Both of these challenges have illustrated how important both the physical movement of goods as well as the transmission of information around the goods are in keeping businesses trading and supply chains moving. Customs facilitation is key to ensuring goods can continue to move quickly without delays.

We would urge more engagement between government and the industry in both future planning to ensure the resiliency of supply chains and transport in response to key crisis such as a global pandemic as well as other disruptions related to weather, trade and other issues. Regular dialogue between the government and the industry is also key in highlighting wider issues such as discussed in the consultation from skills shortages and training to decarbonisation. These regular discussions can help to better inform policy and by working in partnership can achieve positive results.

Road User Charging

Any road user charging should have a clear intention – for example, encouraging lower emission vehicles and should provide those using cleaner vehicles with a reduced charge. Any monies collected through this charge should be invested directly back into road infrastructure, facilities and support for businesses to move to cleaner vehicles.

Intermodal Transport/Integrated Transport Planning

Is freight transport being taken into account sufficiently within Ireland’s integrated transport planning system, particularly the various transport strategies for urban areas?

We believe it is important to understand the transport of goods and the importance of integrated movement of these goods into and out of the country. As an island nation, it is key that goods can move into and out of the country as easily as possible to support Irish businesses. For example, when the new runway is completed at Dublin Airport there is the potential for restrictions to come into place for night flights. The North Runway Planning Permission, which was approved in 2007, bans flights between 2300 hours and 0700 hours on the new runway (once completed) and caps flights during these hours to 65 on the current runway. In 2019, movements within this night period exceed 100. Whilst the Airport Noise Competent Authority (ANCA), has commenced an assessment of the noise situation at Dublin Airport, it is critical that the concerns of the aviation air freight sector are taken into account.

Air Freight flown at night is a very important mode of distribution in Ireland supporting €1.1 billion in GDP and 15,000 jobs.¹ International trade does not operate in a single time zone. Trade must operate 24/7 within an interlinked global transport network and night flights are a necessity for express carriers to support the continued growth of the 24-hour global economy. There should be no upper limit restrictions on the number of night flights proposed at 65 movements between 2300 and 0700hrs. To reduce the number of night flights at the same time as introducing a second runway is not conducive to supporting the economic recovery of Ireland and future proofing our reputation as one that is ‘open for business’. The level of uncertainty and length of time caused by the pending review of the planning conditions, with no resolution potentially until Summer 2022, is causing concern within the sector that hinders business

¹ “The Economic Impact of Cargo Night Flying at Dublin Airport” Freight Transport Association Ireland

decisions and investment at a time that Ireland needs support for a sustainable COVID recovery plan. Our industry needs certainty for the future and to build in room for growth to support the economy. The process should be accelerated now. Economic importance is paramount and will be a ceiling on Ireland's economic growth.

Labour Market and Skills

Driver shortages has been an issue for several years for UPS. Recruitment, in country training capacity, test application and the on road testing process were already very slow and have now been exacerbated by Covid. From a recruitment perspective, we believe more can be done to highlight the attractiveness of the industry as a career. We also believe more support can be given to the industry such as training or apprenticeship grants, increase the capacity for testing, and reducing the time it takes for training.

Decarbonisation

We take our environmental footprint extremely seriously. We continually work to minimise the miles we travel and strive to increase the energy efficiency of our transportation network, regularly monitoring our carbon footprint and investing in low and zero carbon technologies such as electric vehicles and liquefied natural gas HGVs. Through our **rolling laboratory**, UPS can determine how these alternative fuels and advanced technologies perform in real-world operating conditions, quickly deploy viable options at scale, and spur market growth for alternative solutions.

In addition to our 2021 pledge to be carbon neutral across scope 1, 2 and 3 emissions in our global operations by 2050, we have established interim 2035 environmental sustainability targets:

- 50% reduction in CO2 per package delivered by 2035 (2020 base year).
- 100% of company facilities powered by renewable electricity by 2035.
- 30% of the fuel used in its global air fleet be sustainable aviation fuel by 2035.

UPS is committed to improving air quality and is also working on solutions for reducing congestion which are detailed below. However, we would urge Government to understand the challenges commercial fleets currently face regarding vehicle availability, grid capacity and final

mile delivery (amongst others) and that any restrictions are balanced with the recognition of the importance road freight plays by providing critical delivery and collection services for businesses and consumers across the Ireland. Businesses in the transport sector need a clear road map to decarbonisation so that they can plan their purchasing and expenditure and have confidence that the infrastructure will be there to support the transition to alternative fuel and advanced technology vehicles. Overall, businesses need clarity and stability of regulation with adequate lead time for changes, in order to create an environment that promotes investment and partnership.

At UPS, our goal has always been to move towards low and zero emission vehicles as well as identify solutions for more sustainable deliveries. Globally our delivery fleet includes 12,000 (and growing) alternative fuel and advanced technology vehicles. However, one of the key challenges has been cost effective electric vehicle availability. This is not currently provided by the market as most commercial EV's are up to three times the cost of an equivalent diesel vehicle. As a result in the last 10 years we have developed a diesel to electric conversion with EFA-S (a company in Germany), worked with Tevva on a diesel to range-extended electric conversion solution and most recently with Arrival in the UK on the development of a brand new design of EV. But still the problem persists. In addition, EVs currently have a limited range (between 50-60km) so may not be an ideal solution for deliveries in rural locations which may have to cover more mileage. Bridging technologies such as range extended electric vehicles and utilizing renewable natural gas (RNG) or biomethane for larger vehicles will also be key for longer distances and delivery in rural areas.

Electric Vehicle Charging Infrastructure

Another key challenge we have faced with expanding our electric fleet is not having enough grid capacity to charge these vehicles simultaneously at peak times in the evening. It is not feasible to charge the vehicles during the day as they are on the streets carrying out multiple deliveries with only minimum time spent at each location. Grid upgrades can be extremely costly and when combined with the cost of an EV, this can be prohibitive for some companies. In the UK, UPS worked with a consortium to deploy a radical new technology solution with the potential to dramatically reduce the cost of recharging a fleet of electric vehicles. The consortium, which was comprised of UPS, UK Power Networks and Cross River Partnership, and supported

financially by the UK's Office for Low Emission Vehicles, commissioned a combined smart-grid and energy storage system at the UPS operation in central London. The initiative had the immediate effect of raising the number of 6-7.5 tonne vehicles that can be recharged simultaneously overnight from the electricity power supply available at the site from 65 to the whole 170 fleet without any further external grid reinforcement work.

UPS believes the day is rapidly drawing closer when the cost of an urban distribution electric vehicle, including the necessary power supply investments, will be lower than that of its diesel counterpart. This breakthrough will be instrumental in enabling electric vehicles to be deployed in scale in the world's cities, itself an essential component of tackling the air quality challenges that those cities face. We believe that reform of the market structure surrounding the upgrade of local electric grids is critical so that the end user does not need to bear the entire upstream cost of the upgrade regardless of the owner of the upgraded asset.

For vehicles above 7.5t and those making longer journeys, electrification is still a way off. The only practical ultra-low carbon alternative fuel available for use in Heavy Goods Vehicles (HGVs) today is renewable natural gas (RNG) or biomethane. For heavy, long haul vehicles we believe that RNG holds the most promise in this regard as it can cost effectively deliver up to an 80% reduction in greenhouse gas emissions. UPS believes that electrification will become a feasible sustainable solution for long distance heavy vehicles, but this will most likely require a combination of batteries for use on minor and urban roads with overhead catenary charging on major roads. We would suggest that any infrastructure strategy should recommend a role for gas HGVs and the corresponding infrastructure required to provide certainty to industry as well as coordinated research into the feasibility and cost effectiveness of the electrification of highways.

Last Mile/E- Cargo Bikes

At UPS we are utilising different concepts for cycle logistics which are aimed at reducing traffic congestion and emissions associated with urban package delivery. We are currently using e-cargo bikes in Dublin and in several cities across Europe.

The challenge with e-cycle logistics generally is that we are limited by the capacity of the cargo bikes to carry sufficient volume of packages to make the delivery system viable. As a result, we look to place a large container (or "eco-hub") in a "staging area" within a city centre location that would allow the handler (or handlers) to continually refill the cargo bikes throughout the day and

carry out final mile deliveries. In Dublin, we have two eco-hubs – both at street level on a pedestrianised city street (in Wolfe Tone St) as well as near Trinity College in an alleyway behind an office building.

In UPS' experience, we have found that space being available for city centre container staging, e-tricycle parking and charging availability to support sustainable final mile deliveries, have all proven to be challenging but crucial in ensuring we can, on a practical level, carry out our operations in a sustainable and commercially viable manner.



Dublin

In addition to the e-cycles, we also operate an e-assist walker solution in Dublin. The e-assist walker is a powered device that supports an on-foot delivery operator. Ordinarily powered devices are not allowed on pavements without a specific exemption for safety reasons. Dublin City Council has approved usage of the walker on pavements and in pedestrianised areas such as Grafton St. The e-walker has proved very popular in Dublin and has been operationally very efficient in delivering around pedestrianised and dense urban areas. In our experience, we have found that strengthening public-private partnerships is much more effective when implementing new policy, including environmental regulations.



We also believe that there are more opportunities to provide solutions for sustainable, final mile urban deliveries. By developing the eco-hub concept into urban logistics hubs, incorporating

package sortation within the city centres, would enable less congestion in and out of city centres during peak times. This would also enable use of brownfield sites and support employees who would not have to travel to out of town distribution sites, saving time and money, especially when traveling in the night hours as many hubs operate overnight to sort packages.

We also believe that the high volume of residential deliveries which has grown over the past year and a half due to Covid is not sustainable. We need to also encourage alternative solutions such as parcel lockers that only require simple planning approval processes which will create a fair and transparent competition with postal services who do not currently need to obtain planning permission for their lockers.

From UPS's perspective, the recipe for success lies not in costly restrictions and penalties but rather in partnership between public and private stakeholders as well as financial and regulatory support that helps businesses accelerate their transition to low/zero emissions solutions.

Outlined below are a range of measures that we believe can help UPS and others make this transition:

- A review of measures to promote the availability of electric vehicles – stricter OEM CO2 standards, OEM sales mix quotas, and incentives to move production to EVs.
 - UPS Ventures, the company's venture capital arm, is investing in Arrival, based in Oxfordshire, to accelerate the development of electric delivery vehicles for UPS by developing a new suite of electric delivery vans aimed at reducing emissions.
 - In addition to making an equity investment (minority stake) we are also committing to purchase 10,000 EVs from Arrival for use globally.
- Funding to support the deployment of alternative technologies that due to their high cost are not yet able to support themselves commercially.
 - This could include government grants, tax credits and cross-subsidisation from fossil fuels to renewable fuels as well as operational privileges such as favourable parking / loading / unloading arrangements, retiming of deliveries for low / zero emission zones, decreased rates for tolls / road charging and allowing zero emission vehicles use of bus lanes.

- The Transportation Strategy should recommend a role for gas (biomethane) HGVs as a key method for decarbonising heavy goods transport, especially as a bridging solution which can deliver results immediately until other alternatives are developed.
- Reform of the market structure surrounding the upgrade of local electric grids so that the end user does not need to bear the entire upstream cost of the upgrade regardless of the owner of the upgraded asset.
- A review of the provision of facilities or space in city centres to enable e-assist cycle operations, including micro consolidation sites, e-cycle parking locations and charging facilities. UPS is also utilising cycle logistics which are aimed at reducing traffic congestion and emissions associated with urban package delivery.
- Rationalisation of legislation surrounding e-assist cycle solutions onto a 'performance standard' basis in which the end objective is regulated (eg. speed) and not the means used to achieve it (eg. motor power).
 - Currently, e-assist cycles are limited to 250W rated motor power. This is suitable for the purpose for which it was originally intended – the pedelec cycle - but severely limits the usefulness of this technology for logistics purposes
- Review of legislation surrounding e-assist walker solutions so that they can be used in controlled situations to replace vehicles and thus reduce congestion.
 - Dublin City Council has approved usage of the walker on pavements and in pedestrianized areas such as Grafton St during a trial period.
- Coordinated research into the feasibility and cost effectiveness of the electrification of highways.
 - UPS believes that electrification will become a feasible sustainable solution for long distance heavy vehicles, but this will most likely require a combination of batteries for use on minor and urban roads with overhead catenary charging on major roads.
- Globally coordinated investment to fund the development of drop-in renewable aviation fuels to help them reach a scale that enables them to be commercially viable.

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1 July 2021

Ten Year Strategy for the Haulage Sector

Dear Hildegarde,

I welcome the opportunity to make this submission to the Department of Transport's consultation process on the haulage sector and I hope you will take account of the views expressed in the formulation of Government policy concerning the sector.

1. Declaration of interest – I make this submission with a number of specific perspectives in mind. First, before being elected to the Dail last year I ran a licensed haulage business and have a very direct knowledge of the challenges and issues facing the sector. Secondly, I also served as the President of the Irish Road Haulage Association, which gave me a particular perspective on the relationship between the State, its agencies and the sector. Finally, as a TD I represent a constituency with a significant number of licensed hauliers as constituents and with Rosslare Europort as a significant trading hub between Ireland, the UK, and Continental Europe.

2. General observations – in the context of my direct experience of the sector there are a number of overarching observations which underpin this submission;

a. **An unrecognised sector** – traditionally the licensed haulage sector has been very poorly treated and regarded by the State and its agencies. The views and perspectives of hauliers, their staff and families have been ignored in the context of policy formation and the introduction of measures which directly impact on their businesses and lives. The State has all too often adopted an approach towards licensed hauliers which is mired by distrust, dismissiveness and diktat – in part a legacy of the significant level of State ownership and control of freight movements in Ireland until EEC membership started to facilitate free movement of goods and competition. Elements of this legacy remain to this day with the attitude and approach of the State and in particular State Agencies, still very dismissive of the sector. This attitude towards the sector needs to be fundamentally changed.

b. **A challenging industry** – my first hand knowledge of the sector and my interaction with the hundreds of licensed hauliers that operate their businesses here confirm that this is a sector that operates under extremely difficult conditions. With very tight margins and high levels of competition, this is not a sector for the feint hearted. Businesses in this sector struggle to survive and are often the element in the supply chain with the least power and influence – as a sector licensed hauliers are often the recipients of poor treatment and have the least economic power and influence. They are a vulnerable sector and this vulnerability needs to be recognised at a policy level

c. **A core element of national infrastructure** – the challenges from both COVID 19 and Brexit have demonstrated that the national licensed haulage fleet is a core part of Ireland's economic infrastructure and needs to be recognised as such. Licensed hauliers literally provide the wheels that keep our society and our economy moving, both nationally and internationally. Throughout the pandemic, licensed hauliers took considerable risks to keep supply lines open by travelling through the continent to deliver and collect supplies. Nationally this pattern was replicated with

licensed hauliers delivering medical supplies, food, household supplies and general freight throughout Ireland. This contribution was immense and underpinned the importance of having a national haulage fleet which can serve our island economy effectively and efficiently.

3. Decarbonisation and the licensed haulage sector - as I read the consultation document for the new 10-year strategy I have a deep concern that the political orthodoxy associated with a Green Minister for Transport is leading to the most basic and fundamental error being made on how decarbonisation of the national haulage fleet is secured. The policy needs to proceed with an honest recognition that notwithstanding any preferences to the contrary, it is a reality that diesel will remain the only suitable and practical mainstream fuel to power the national haulage fleet over the next 10 years. While other fuel and transmission technologies are being developed, none are at a level of development that will allow them to be meaningful and realistic options for the national fleet in the short to medium term.

This needs to be reflected in the National Strategy with a renewed focus on measures that can be taken to make a diesel-powered national haulage fleet achieve lower emission levels. Thankfully, technology has improved significantly now to an extent that diesel transmission systems for new generation HGVs are achieving lower emission levels than domestic cars. Policy initiatives, pricing incentives and grant schemes need to embrace these new technologies in the context of the reality of diesel remaining by necessity as the main transmission source for HGVs. No amount of wishful thinking will change this reality over the next 10 years. And these decisions need to be made now if the national fleet is to be upgraded. There is no point in penalising hauliers for driving diesel powered vehicles if sustainable and realistic alternative options are not available to them. There are also a series of simple and straightforward measures which licensed hauliers have already identified which can help to reduce emissions today – whether this involves removing barriers at tolls, re-sequencing traffic lights or opening port facilities and sailings for times with less congestion and providing price incentives for operators using vehicles that have lower emission levels.

4. Regulation of the sector – one outcome of this consultation process and any new strategy for the sector must involve a fundamental review of the regulation of the sector. The Road Safety Authority is the primary regulator for the haulage sector but has proved itself to be ineffective and unsuitable for this role. As an entity the RSA has epitomised the condescending and dismissive approach too often taken by the State towards the sector. This is exhibited through heavy handed and poorly managed enforcement actions, poor training and assessment programmes and an extremely negative process for engagement with the sector. This is important as a badly focused regulatory structure, which penalises the compliant, but seemingly allows rogue operators on foreign plates to get away with limited sanctions, erodes respect for the RSA and the entire regulatory system. The RSA seem to be above criticism on the basis that any negative comments against them are perceived as being weak on road safety. This is not the case at all – it is perfectly appropriate that the RSA should be held up to the highest standards and expectations to deliver on their mandate effectively, proportionately and in a way that is respectful to the challenges being faced by those that they are regulating. There are many in the sector who believe that the regulatory function exercised by the RSA should be transferred to An Garda Síochána, where at least core standards of discipline, accountability and review are in place. These are most often an omission in dealings with the RSA.

5. Labour challenges – one of the major challenges facing the licensed haulage sector is the shortage of labour. As an industry the licensed haulage sector is challenging with anti-social hours, long periods of absence from home, delays, and personal risk. Attracting new entrants to train as drivers or support personnel is critical, given the age profile of existing drivers. The IRHA is to be commended for constructive work that is being done to facilitate vocational training of new entrants in conjunction with local ETBs. The RSA has not stepped up to the mark in this regard and the Department of Transport needs to take a greater role to ensure that these training initiatives are facilitated, that relevant training operated by the RSA is fit for purpose and embraces digital technologies. At present the RSA has been resistant to embracing new training formats or approaches and are simply being left behind. The RSA cannot be allowed to damage the health, viability, and future of the sector.

6. Costs and competitiveness – this is a sector with tight margins and high levels of competition. This needs to be recognised and addressed by the State to ensure that cost control is rigorously enforced. We cannot have a situation where one arm of the State recognises the challenging operating environment for the sector, but other elements add to these overheads or fail to tackle obvious problems which are eroding the competitiveness of the sector. Whether the relevant cost arises from carbon tax, insurance costs, tolls, environmental charges or labour costs, the State needs to exercise a dead hand in stopping any inflationary pressures on the sector. Otherwise, operators will cease to see the industry as one which can provide a viable living and instead, will gravitate elsewhere.

7. Engagement with the sector – in my experience as a licensed haulier, President of the IRHA and as a public representative I have come to the conclusion that the current structures and processes for engagement between the sector, Government and relevant State agencies is fundamentally flawed. I have no doubt that the licensed haulage sector has lots to offer the State in terms of inputting practical perspectives on issues of direct concern. There is a strong sense within the sector that valuable perspectives that operators offered on Brexit and connectivity with the UK and Continental Europe were dismissed out of hand by Government – purely because of the source of the input. This is wrong. This will require some new structure to ensure that these views are received and taken on board. Public policy outcomes can only be improved through effective engagement between the State and key stakeholders in key economic sectors – at present these channels are missing as regards the licensed haulage sector. A new Licensed Haulage Forum needs to be established with structures for input and accountability.

8. Oireachtas Debate – finally I think that the issues raised by the consultation paper and the significance of the licensed haulage sector for our national progress and success as a country merit a debate in the Oireachtas before the Strategy is finalised. It would be important to get the perspective of public representatives generally on this sector and the issues that the Government are seeking to address in the Strategy.

I hope that you find these comments and observations helpful and will take them into account in the consultative process.

Your sincerely
Verona Murphy

Independent TD Wexford