



An Roinn Iompair
Department of Transport

Ireland's Road Haulage Strategy 2022-2031



Prepared by the
Department of Transport
[gov.ie/transport](https://www.gov.ie/transport)

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Foreword

Minister Ryan



This strategy for the haulage and road freight sector is an important deliverable coming out of Ireland's Climate Action Plan, in particular because it addresses a sector which faces additional challenges on its decarbonisation journey compared to other transport modes. In line with the sectoral emissions ceilings set by Government in 2022, a 50 percent reduction in transport emissions is required by 2030. This will be a huge challenge and one that will require transformative change across society and the economy. Heavy goods road freight is a 'hard to abate' sector given the fact that more than 99 percent of heavy goods vehicles are currently diesel-fuelled, that road freight transport is a high energy user and that alternative vehicle technologies have not, so far, developed as quickly as for cars, light goods freight or even buses. There are positive signs however that this will begin to change in the near future.

At the recent COP27 in Egypt, Ireland was proud to become a signatory to the Global Memorandum of Understanding (MoU) on Zero Emission Medium- and Heavy-Duty Vehicles (ZE-MHDVs), which targets a new sales share of 30 percent for zero emission medium- and heavy-duty trucks and buses by 2030. The Global MoU for ZE-MHDVs is a policy signal by Governments that they intend to put in place measures and supports to drive the shift to zero emissions in heavy goods transport. A 30 percent of new sales by 2030 target is ambitious but achievable. At European Union level, the forthcoming revision to the EU's CO2 standards for Heavy-Duty Vehicles is expected to compel manufacturers to increase the supply of zero- or low-emission vehicles to the market, with a full phase out of the production of new fossil-fuelled Heavy-Duty Vehicles at European level by 2040.

In the meantime, biofuels will play an important transitional role for existing vehicle types. Ireland has already set a trajectory to achieve a 20 percent mix of renewable fuel in biodiesel by 2030 via the Biofuels Obligation Scheme and there may be potential for greater use of biofuels, biomethane and green hydrogen in heavy goods road transport if sustainability credentials can be properly verified and production capacity for these new fuels is increased. Vehicle technology and fuel changes will still need to be complemented by other measures however. Here the circular economy concept can be applied to freight transport – digital and operational changes can maximise the efficiency of existing operations and routings, for example through greater load sharing and the establishment of freight consolidation centres. While this strategy is focused on road freight, it also includes a section on integrated and intermodal transport which highlights the importance of network planning across modes at the national, regional, and local levels. It also looks forward to the All-Island Strategic Rail Review, which explicitly includes a goal to identify opportunities for Ireland's ports and airports to be linked with the rail network. These linkages will be key to our ambition of integrating road and rail freight in order to reduce congestion and emissions.

Eamon Ryan TD,
Minister for Transport

A handwritten signature in blue ink, appearing to read 'E. Ryan', written in a cursive style.

Minister Naughton



The importance of haulage and road freight in the everyday life of Irish citizens is often overlooked despite the central role this sector plays in supporting businesses and communities across the country. This was particularly evident during the height of the COVID-19 pandemic, when haulage, freight and logistics professionals kept our supermarket shelves stocked and transported vital medical supplies and vaccines to communities that needed them.

The publication of this Strategy was a commitment in the Programme for Government and is the first-ever Government strategy for the haulage and heavy goods road freight sector. This Strategy contains 39 actions designed to help and support the haulage and road freight sector to overcome the very significant challenges it is currently facing, including decarbonisation and the driver shortage. While recruitment of drivers from abroad can play a role in the short term, a more sustainable solution to attract and retain drivers is also needed. The creation of sustainable career pathways in logistics and supply chain, including in driving, will help with this. There has been great progress in recent years in developing new third level, apprenticeship and traineeship programmes as well as a greater range of options for continuous professional development for workers already in the industry. Improved working conditions and greater diversity within the sector will also help to improve its attractiveness to young people and new entrants.

Road safety is extremely important and this Strategy builds on the recent Government Road Safety Strategy, aiming to improve overall compliance with road safety standards and safe work practices. It also looks to improve dialogue between industry and Government bodies in relation to road transport regulation and enforcement practices.

The implementation of the actions outlined in this Strategy will be monitored by the Road Freight Forum, a new body which will formalise engagement between Government and industry, and which will allow for clearer communications and more collaborative policy development. The

Road Freight Forum will also consider the evolution of the Strategy over time, with the identification of new priorities, actions and enablers as needed to help support the sector.

The Strategy was developed in partnership with industry and other stakeholders (listed in Annex 2) and I would like to thank all those who contributed to the public consultations that were held during its development. It is my sincere wish that the spirit of co-operation and collaboration that led to the publication of this Strategy will be carried forward by the Road Freight Forum to the end of this decade and beyond, helping us to build a clean, green and modern haulage and road freight sector that will continue to support a healthy economy and vibrant communities throughout Ireland.

Hildegard Naughton TD,

*Minister of State at the Department of Transport
with special responsibility for International and Road
Transport and Logistics*

Hildegard Naughton

2 | Acronyms

Acronym	Meaning
ABTA	Area-Based Transport Assessment
AFIR	Alternative Fuels Infrastructure Regulation
AGS	An Garda Síochána
AFHDV	Alternatively-Fuelled Heavy-Duty Vehicle
B7	7 percent Biodiesel blend
B20	20 percent Biodiesel
BioLPG43	43 percent Biological Liquefied Petroleum Gas
BRUCE	Better Road User Charging Evaluation
CAP	Climate Action Plan
CCTV	Closed-Circuit Television
CEF	Connecting Europe Facility
CILT	Chartered Institute of Logistics and Transport
CNG	Compressed Natural Gas
CO2	Carbon Dioxide
CPC	Certificate of Professional Competence
CSO	Central Statistics Office
D/Transport	Department of Transport

Acronym	Meaning
DECC	Department of Environment, Climate and Communications
DETE	Department of Enterprise, Trade and Employment
E10	10 percent Bioethanol blend
EEA	European Economic Area
EPA	Environmental Protection Agency
ESB	Electricity Supply Board
ESEG	Energy Security Emergency Group
ETD	Energy Taxation Directive
EU	European Union
EV	Electric Vehicle
FCEV	Fuel Cell Electric Vehicle
FTAI	Freight Transport Association of Ireland
GB	Great Britain
GDA	Greater Dublin Area

Acronym	Meaning
GDPR	General Data Protection Regulation
GHG	Greenhouse Gas
HDV	Heavy-Duty Vehicle
HGV	Heavy Goods Vehicle
HSA	Health and Safety Authority
HVO	Hydrotreated Vegetable Oil
ICE	Internal Combustion Engine
IRHA	Irish Road Haulage Association
ITF	International Transport Forum
km	kilometres
KtCO ₂ eq	Kilotonnes of Carbon Dioxide equivalent
LEVTI	Low Emission Vehicle Toll Incentive
LGV	Light Goods Vehicle
LHESS	Licensed Haulage Emergency Support Scheme
LNG	Liquefied Natural Gas
LoLo	Load-on Load-off

Acronym	Meaning
LSCSG	Logistics and Supply Chain Skills Group
LSTs	Longer Semi-Trailers
MATS	Metropolitan Area Transport Strategy
MHDV	Medium- and Heavy-Duty Vehicles
MoU	Memorandum of Understanding
MtCO ₂ eq	Megatonnes of Carbon Dioxide equivalent
NDP	National Development Plan
NIFTI	National Investment Framework for Transport in Ireland
NORA	National Oil Reserves Agency
NOx	Nitrogen Oxides
NPF	National Planning Framework
NTA	National Transport Authority
OEMs	Original Equipment Manufacturers
PCR	Polymerase Chain Reaction
PPP	Public Private Partnership

Acronym	Meaning
RED	Renewable Energy Directive
RES-T	Renewable Energy Share in Transport
RFNBO	Renewable Fuel of Non-Biological Origin
RoRo	Roll-on Roll-off
RSA	Road Safety Authority
RSEs	Regional Spatial and Economic Strategies
RSS	Road Safety Strategy
RTOL	Road Transport Operator Licensing
SEAI	Sustainable Energy Authority of Ireland
SMEI	Single Market Emergency Instrument
SSPA	Safe and Secure Parking Areas
TCA	The EU-UK Trade and Cooperation Agreement
TEN-T	Trans-European Transport Network
TII	Transport Infrastructure Ireland
UK	United Kingdom
ZE-MHDV	Zero Emission Medium- and Heavy-Duty Vehicles

Acronym	Meaning
ZEV	Zero Emission Vehicle
ZEVI	Zero Emission Vehicles Ireland



3 | Executive Summary

Ireland's domestic and international road freight sector is an integral part of the economy, with the vast majority of freight movements in Ireland taking place by road and almost all international movements including an element of road freight as part of multi modal supply chains that also include air, sea and rail freight. The haulage and road freight sector has faced many challenges in recent years with the overlapping crises of Brexit, COVID-19 and the war in Ukraine. These crises have highlighted the importance of the sector and demonstrated also how complex international supply chains have become. This underlines the importance of all stakeholders working together – industry, Government and international partners – to ensure the resilience of Ireland's supply chains.

The haulage and road freight sector is a key employer and makes a significant economic contribution, bringing products into Ireland which are essential to Irish construction, manufacturing and service businesses as well as supporting Irish exports that are sold abroad. There is however a long-standing labour shortage and skills gap in the industry with a particularly acute shortage of Heavy Goods Vehicle (HGV) drivers.

This is the first dedicated Road Haulage strategy and in line with the commitment in the Programme for Government - it focuses on generating efficiencies and improving standards, while helping to create secure employment and assisting the sector to move to a low-carbon future. This Strategy sets out the measures and supporting policies which are needed to deliver on these objectives, in particular for decarbonisation and in developing the skills base to ensure the long-term viability of the industry.

The Department of Transport opened a first public consultation in April 2021 which sought stakeholder and citizen views on the development of the strategy. A total of 43 submissions were received as part of that consultation. A second consultation on a draft text of this strategy was published on 09 November 2022. This final strategy takes account of the submissions received during both consultations.

The strategy has seven thematic sections. They are:

1. **Brexit, COVID-19 & Crisis Management**
2. **Sustainability & Decarbonisation**
3. **Road Infrastructure and Usage Charging**
4. **Integrated Transport Planning and Intermodal Transport**
5. **Road Safety & Enforcement**
6. **The EU Mobility Package and Road Transport Operator Licensing**
7. **Labour Market & Skills.**

Each section sets out the relevant background and context for that area and then goes on to outline the actions, initiatives and progress that have taken place in those areas in recent years. The strategy then introduces a series of proposed actions in each section. These are split into 'Short-term priorities' which are expected to be completed in a 2-3 year timeframe and 'Enablers for Medium- to Long-term progress' which will ensure the delivery of policy objectives over the full term of this strategy.

A central short-term priority action is the establishment of a Road Freight Forum with representation from relevant Government Departments, agencies and the haulage, freight distribution and logistics sector. The Forum is envisaged to meet three times a year, although extraordinary meetings could also be organised in response to crisis events. It will play a central role in facilitating the implementation of this Strategy, leading collaboration among stakeholders on relevant actions, reviewing action outcomes and formulating new actions and priorities consistent with the policy aims of the strategy, as needed.

The successive global crises of recent years has demonstrated the need for improved communication among stakeholders and exposed the need for improved data collection and data sharing in order to support evidence informed policy making. Therefore, a further key priority action under the strategy is a data project, to be undertaken in consultation with key stakeholders

in industry and public bodies, to map the data currently available on the road freight sector and expose data gaps, where they exist. Following completion of this data audit, a further action will aim to identify data sources or collection points to fill those data gaps.

Global freight demand is forecast to continue to grow, with the International Transport Forum (ITF) forecasting that global freight transport demand across all modes will more than double over the next three decades. Along with this expected growth there will be a responsibility to decrease emissions from the sector in line with climate commitments. Addressing the challenge of decarbonising the road freight sector is an essential element of the strategy. Moving the sector towards a low-carbon future will be a significant challenge and it is widely acknowledged that heavy goods freight is a harder to abate sector. While the scale of behavioural and technological change required by the sector is considerable, the next phase of the Climate Action Plan (CAP) will see the overall burden of emissions reduction falling to a greater extent on private cars in the medium term to 2030. Targets to have 3,500 low-emission heavy goods vehicles on the road by 2030, along with 30 per cent of new sales of medium- and heavy-duty vehicles (trucks and buses) to be zero emission by 2030 are ambitious - but achievable targets. Even meeting these targets however, and despite major changes on the manufacturing side to move to the production of alternatively fuelled vehicles, a large majority of the heavy goods fleet operating on

Irish and European roads in the medium term will continue to be powered by the internal combustion engine.

It will take time for Battery Electric Vehicles and other alternatively fuelled vehicles to become widely available and affordable across Europe. Ireland's geographic location, as well as the requirement for right hand drive vehicles, may lead to a slower delivery of such vehicles into Ireland. Biofuel blending, where renewable fuels are mixed into liquid fossil fuels, will play a key role as a transitional measure that will help to reduce emissions in existing fleets for both passenger transport and road freight.

Short term actions in the decarbonisation section of the strategy include the maintenance and expansion of the Alternatively Fuelled Heavy Duty Vehicle Grant Scheme, updating the national policy framework on the use of alternative fuels in transport and supporting the work of Zero Emission Vehicles Ireland (ZEVl) to enable the provision of charging infrastructure for HGVs, as well as establishing a national certification/ accreditation system for eco-driving courses, and the completion of a study examining the feasibility of freight consolidation centres.

This section also includes a decarbonisation roadmap for the sector showing how recent achievements and the actions and enablers in this strategy will support the achievement of 2030 targets.



The Road Infrastructure and Usage Charging section describes Ireland's current road network and how it supports heavy goods freight and access to key strategic locations such as ports and airports. The potential future role and implications of road usage charging for the maintenance of the road network are also covered. An important priority action in this section is the mapping of the current infrastructure available to the haulage and freight sector including rests stops and refuelling stations. This project will assess the quality and quantity of such infrastructure, enabling targeted interventions where appropriate.

The Integrated Transport Planning and Intermodal Transport section of the strategy considers transport network planning at the national, regional, and local levels as well as considering the potential for modal shift and intermodal transport in Ireland. While the rail freight mode share has historically been low, the forthcoming All-Island Strategic Rail Review will include consideration of the potential to increase the use of the rail network for freight transport.

The main ports in Dublin, Cork, Shannon Foynes, Waterford and Wexford all have existing rail line connections close to or onto the quays. The decarbonisation of the haulage system can benefit from the revival of rail freight and the road haulage system will have to be integrated and make best use of those rail assets. This strategy will be updated when the All-Island Rail Review is completed.

The Road Safety section highlights some of the key developments over recent years including the publication of the Road Safety Strategy and establishment of the Commercial Vehicle Operator Advisory Panel. The actions in this section are all short-term priorities which reflect the urgent need to take action on safety issues once they have been identified. The actions proposed in this section include a commitment to a public consultation on the introduction of fixed charge penalties for certain road transport offences by professional drivers as well a review of the content of the Driver Certificate of Professional Competence (CPC) with a view to reforming the programme to ensure it remains relevant and useful for professional drivers.

The European Union (EU) Mobility package and Road Transport Operator Licensing section outlines the background to the EU Mobility package – which aims to better balance the objectives of safety, social fairness, economic growth and sustainability

in the rules governing the common road transport market in the EU. The actions identified in this section include the implementation of existing EU legislation and taking an active role in negotiations shaping future EU transport legislation. The future role of the Road Freight Forum, which will be established under this strategy, in sharing views on EU engagements, including with the United Kingdom (UK), is also highlighted.

There are critical skills gaps identified in key areas of the Freight Transport, Distribution and Logistics sector, with a particular shortage of HGV drivers, and the final thematic section in the strategy addresses these Labour Market and Skills challenges. The Logistics and Supply Chain Skills Group (LSCSG) was established in 2019 to develop and deploy practical actions to address skills needs in the logistics and supply chain sector. The group has been a very successful example of how collaboration between industry, academia and Government can result in real progress. Actions proposed under this section of the strategy include the organisation of an inaugural Logistics and Supply Chain Skills Week for the sector in 2023 and the establishment of research workstreams on the attractiveness of the industry, including improving gender balance and diversity and improving working conditions and work/life balance.

The delivery of this Strategy will involve co-operation among stakeholders from Government Departments, agencies, industry and academia. To support this cooperation, a dedicated coordination and implementation unit will be created in the Department of Transport with access to a project budget for a number of the actions arising out of this strategy and tasked to work collaboratively, in particular with other divisions of the Department and other Government Departments and agencies.

This Strategy will be formally reviewed in 2027 by the Road Freight Forum and the Department of Transport, providing an opportunity to evaluate, assess and modify mid- and long-term enablers and identify new actions as required.

Below is a tabular summary of the Strategy overall

What has already been achieved	Short-term Priorities	Medium to Long-term Enablers
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Crisis Management

<ul style="list-style-type: none"> • Brexit Stakeholder Group • National Contact Points & EU Green Lanes • Guidance & regulatory flexibility • Free COVID-19 testing for entry to France • National Energy Security Framework • Financial supports during COVID-19 pandemic • Excise reduction • Licensed Haulage Emergency Support Scheme 	<ul style="list-style-type: none"> • Establish Road Freight Forum • Mapping of available Data 	<ul style="list-style-type: none"> • Identification of data sources of collection points to resolve recognised data gaps
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Sustainability & Decarbonisation

<ul style="list-style-type: none"> • CAP 21 Actions Established • Global Memorandum of Understanding (MoU) on Zero-Emission Medium- and Heavy-Duty Vehicles (MHDVs) • Sectoral ceilings established • Renewable Fuels for Transport Policy Statement • Biofuels Obligation Scheme • Publication of a review of requirements and constraints on biofuels in Ireland • Alternatively-Fuelled Heavy-Duty Vehicle (AFHDV) Purchase Grant Scheme • Low Emissions Vehicle Toll Incentive Scheme • Establishment of ZEVI 	<ul style="list-style-type: none"> • EU CO2 standard for HGVs • Certification of Eco-driving schemes • Freight Consolidation Centres Study • Review of Biofuel Taxation • Assessment of potential for operational and digital efficiencies 	<ul style="list-style-type: none"> • EU Fit for 55 legislative package • Support for ZEVI work on 2025 EV infrastructure Strategy Review and implementation of AFIR requirements • Update National Policy Frameworks on the use of alternative fuels in transport. • Maintenance of AFHDV Grant • National Hydrogen Strategy • Continue to review of taxation for HGVs • Support the Whole of Government Circular Economy Strategy
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What has already been achieved

Short-term Priorities

Medium to Long-term Enablers

Road Infrastructure & Usage Charging

<ul style="list-style-type: none"> • National Development Plan (NDP) – Significant investment in the national road network over the 10 years covered. • National Investment Framework for Transport in Ireland (NIFTI) investment priorities & hierarchy 	<ul style="list-style-type: none"> • Haulage sector to be considered in National Roads 2040 Strategy • Advance Better Road User Charging Evaluation (BRUCE) study • Map current infrastructure for safe and secure parking available to HGV drivers 	<ul style="list-style-type: none"> • Fulfil Trans-European Transport Network requirements • Advance further phases of BRUCE
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Integrated Transport Planning & Intermodal Transport

<ul style="list-style-type: none"> • Regional Spatial and Economic Strategies (RSES) • Metropolitan Area Transport Strategies (MATS) • Local Transport Plans (LTPs) • Rail Freight 2040 • National Ports Policy 2013 • Container Terminal Ringaskiddy • National Aviation Policy 2015 	<ul style="list-style-type: none"> • All Island Strategic Rail Review • Strategies for Sustainable freight Distribution • Regional – Level Freight Strategies 	<ul style="list-style-type: none"> • Consideration of road freight sector in transport strategy document and policies • Market and prospective analysis of Multimodal freight terminals
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Road Safety & Enforcement

<ul style="list-style-type: none"> • Road Safety Strategy • Education campaigns for Professional Drivers • Commercial Vehicle Operator Advisory Panel • Recruitment of 36 additional enforcement and support staff for the Road Safety Authority (RSA) 	<ul style="list-style-type: none"> • Draft a National safe Work-Related Road Safety code of practise • Reform of Driver Certification of Professional Competence • Consideration of Fixed Charge Penalties • Implement Common Risk Rating Formula • Electronic Data Solution for Inspection Activity 	
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What has already
been achieved

Short-term Priorities

Medium to Long-
term Enablers

EU Mobility Package & Road Transport Operator Licensing

<ul style="list-style-type: none"> • Licensing for Light Commercial Vehicles (LCVs) • Posted Drivers regime implemented and in operation 	<ul style="list-style-type: none"> • Further implementation of EU Mobility Package • Review of Transport Managers CPC Regime • New Information Technology (IT) system for Road Transport Operator Licensing 	<ul style="list-style-type: none"> • Maintain active role in negotiations shaping EU Transport Legislation
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Labour Market & Skills

<ul style="list-style-type: none"> • Recommendations on HGV driver shortage • Overview of Existing Education and Training Provision in Logistics and Supply Chain • Info Notes – how to qualify as HGV driver • New licence exchange agreements with non-EU/ European Economic Area (EEA) states • New educational offerings e.g., Transport Operations & Commercial Driver Apprenticeship 	<ul style="list-style-type: none"> • Consideration of New License Exchange Agreements • Logistics and Supply Chain Skills week 2023 • Establish source list of research topics relevant to Logistics and Supply Chain skills issues 	<ul style="list-style-type: none"> • Continue work of Logistics and Supply Chain Skills Group (LSCSG) – work programme to be determined by LSCSG
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4 | Haulage and Road Freight in Numbers

41,850

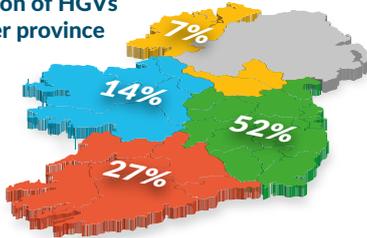
HGVs (>3.5 tonnes) were taxed in Ireland as of end July 2022

22,796 licensed haulage,
19,054 own account sector

*Source: DVCS



Proportion of HGVs taxed per province



61% of all HGVs licensed in Ireland at the end of July 2022 were 10 years old or younger.

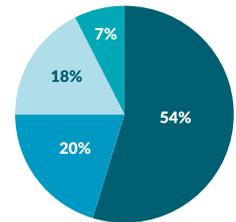
*Source: DVCS

The Transport sector emits **17.7%** of Ireland's overall Green House Gas emissions.

94% of transport emissions are from road transport

Road transport emissions by mode

- Private Car
- Heavy Good Vehicles
- Light Good Vehicles
- Bus



More than **99%** of all HGVs are diesel

*Source: CSO



Licensed Haulage

As of August 2022 there were **3,847** licensed road haulage operators in Ireland

2,470

of which are licensed to operate internationally (**64%**)

1,377

operate nationally (**36%**)

*Source: RTOL



There is a total of **22,796** HGVs authorised on the licenses of these operators

69% are licensed to operate internationally

31% are licensed to operate nationally

70% of licensed hauliers operating domestically have at most 3 HGVs



49% own only 1 HGV



*Source: RTOL



Wednesday is the busiest day for HGVs, with an average of 59,000 HGV journeys recorded at select sites along the National Road Network.

*Arup/TII

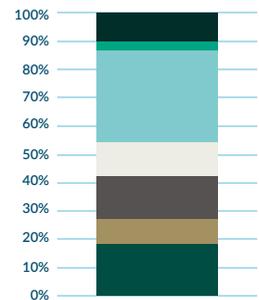
In 2021, HGVs travelled

12.5bn tonne-km.

*Source: CSO

Road freight tonne-km by main use, 2021

- Other
- Goods to households
- Goods to wholesalers/retailers
- Goods to building sites
- Goods to factories
- Agricultural goods
- Import/Export



*Source: CSO

In Q2 2022 there were

100,900

people employed in Transport and Storage in Ireland, of which **20%** were female.

*Source: CSO

Latest industry research cites that

just **2%** of HGV drivers are female

Source: FTAI 'Managers Guide to Distribution Costs Report 2022'



** "Own account" operators self-provide transport as part of their wider business, eg. in manufacture, retail, and construction





5 | Introduction

5.1 | What will this Strategy Do?

This Strategy sets out the strategic and policy direction for the haulage and heavy goods road freight sector for the next decade.

The International Transport Forum (ITF) has forecast that global freight transport demand will more than double over the next three decades¹. As an island nation, Ireland's domestic and international road freight sector plays a vital role in the economy. The movement of almost all goods relies on at least some element of road transport within multi-modal supply chains, which also include sea, air and rail freight. The haulage and road freight sector is a key employer and makes a significant economic contribution, bringing products into Ireland which are essential to Irish construction, manufacturing and service businesses as well as supporting Irish exports that are sold abroad.

In line with the commitment in the Programme for Government, this strategy focuses on generating efficiencies and improving standards, while helping to create secure employment and assisting the haulage and road freight sector to move to a low-carbon future. This Strategy sets out the measures and supporting policies which are needed to deliver on these objectives, in particular for decarbonisation and in developing the skills base to ensure the long-term viability of the sector. Addressing these and other challenges will make a significant contribution to the achievement of Ireland's climate goals as well as promoting greater efficiency within road transport operations.

This is the first dedicated strategy for the road haulage and heavy goods road freight sector in Ireland. It is a sector which has long been recognised as important by Government, but this has become more evident to the public at large during recent crises. Through Brexit, COVID-19 and the Ukraine crisis, the sector has shown its importance as a critical enabler of a functioning supply chain, bringing essential supplies into and around the

State, supporting key infrastructure and enabling the maintenance of economic and social activity. Road transport operators demonstrated agility and resilience in their continued operations to ensure the delivery of medical supplies and vaccines, as well as food products and medicines, essential to everyday life and to the COVID-19 crisis response in particular.

In addition to these crises, the sector faces other long-standing challenges. There is a particular shortage of HGV drivers both in Ireland and internationally, and a skills shortage and lack of diversity more generally in the wider logistics and supply chain sector. There is a need to attract more young people and women into the industry to address this systemic issue.

The licensed haulage sector² in Ireland is mostly made up of smaller operators with fewer than five vehicles, many of which are family businesses. Anecdotally, there is a concern that many of these businesses will not be taken over by the next generation, meaning that the driver shortage will worsen unless action is taken. These small haulage businesses currently operate in a very competitive environment, with tight margins on operating profits and with limited bargaining power in relation to the rates they charge much larger client companies. Some further consolidation of the sector over the next decade could reasonably be expected on this basis.

The haulage and road freight sector is highly regulated, with many of the regulatory requirements emanating from EU legislation on road transport market access, operator licensing and driving as a profession. Recent changes to EU regulations in the Mobility Package were focused on drivers' working conditions, special posting rules for drivers in international transport, access to the haulage market, and improved enforcement. Regulations designed to address non-compliance with operator

1 [ITF, Transport Outlook 2021](#)

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

establishment and cabotage³ rules included the requirement for HGVs used in international transport to return to the country where the truck is registered every eight weeks. For island and peripheral states, this requirement is more onerous on their operators, given the distances involved and the need for a ferry transport leg. There is a need to strike a balance to ensure that EU rules designed to promote fair competition also work for Member States at the geographic periphery of the Union.

This Strategy works in tandem with Ireland's Climate Action Plan and decarbonisation pathway, with a number of relevant and complementary actions already identified in the Climate Action Plan (CAP) and with more to be developed over the coming years.

Now and in the years to come, climate will be the clear focus at EU level. The 'Fit for 55' package of proposals, several of which are relevant for the future of road haulage and freight, will dominate the agenda and the decarbonisation journey for all transport sectors will be one of the most challenging over the next decade. Since HGVs were responsible for 20.7 percent of Irish road transport emissions in 2020, reducing emissions from heavy goods transport will contribute significantly to the achievement of Ireland's climate goals and will be essential to the achievement of a fully sustainable transport system. The technology options for alternatively-fuelled HGVs are still developing and, compared to cars and light goods vehicles, there is limited availability of infrastructure and only a limited supply of alternatively-fuelled HGVs, which are currently priced much higher than their diesel equivalents. There are several ambitious and complementary plans at EU level and nationally to address this. These include the Alternately-Fuelled Heavy-Duty Vehicle Grant Scheme, the Low Emissions Vehicle Toll Incentive Scheme and the Biofuels Obligation Scheme here in Ireland and the many pilots ongoing both here and internationally, as described in section 6.2. It is essential that Government and industry are prepared to move quickly as soon as new technologies become available over the next decade.

This Strategy recognises the scale of the challenge that the industry is facing and acknowledges that the journey ahead will not be easy. It reflects Government's awareness that addressing these challenges requires a multi-layered, collaborative

approach involving industry partners in the haulage, road freight and wider logistics sectors, a number of different Government Departments, academia, training bodies and the business community, along with EU and international partners. This Strategy sets out a roadmap for those stakeholders to tackle challenge and change together. It will build upon the cooperative relationships developed between industry and Government during recent crises, when practical and pragmatic solutions to specific challenges were found when needed. A key output of this Strategy will be the establishment of a more formal mechanism to continue that cooperation and problem-solving into the future via the proposed Road Freight Forum.

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, includes 17 Sustainable Development Goals which are an urgent call for action by all countries. They recognize that ending poverty and other deprivations must also include strategies that improve health and education, reduce inequality, and spur economic growth – while ensuring that the impact on climate change is considered. The Haulage Strategy aligns closely with Ireland's wider commitments in relation to the UN Sustainable Development Goals and the Public Sector Duty. Nine of the 17 Sustainable Development Goals as highlighted below have particular relevance for road haulage and freight –



3 Cabotage is the provision of road haulage services within a Member State by an operator established in another EU Member State.

5.2 | Strategy Structure

The Strategy consists of seven sections based on a number of policy themes with relevance for road haulage and freight.

Each section begins by setting out the relevant policy context, describing the current state of affairs and detailing the challenges arising in that thematic area. A second section describes projects and actions already underway to address those

challenges. A set of new short-term priorities is then identified for each thematic area along with specific action items where these have already been defined. The short-term priorities and related actions are to be progressed in a 2-3 year timeframe. A set of medium- to long-term enablers is then set out which will ensure the delivery of policy objectives over the full term decade of this Strategy.



5.3 | How will it be delivered?

Each of the short-term priorities and medium- to long-term enablers identified in this Strategy have lead owners assigned. It is clear however that many of the actions proposed require a partnership approach for successful delivery. This will require positive and proactive engagement from all stakeholders and a willingness to share information and consider new approaches in order to identify solutions in a collaborative and inclusive manner.

One of the key short-term priorities emerging from the Strategy is the establishment of a new Road Freight Forum. This will formalise engagement among relevant Government Departments,

agencies and the haulage industry and will allow for clearer communications and more collaborative policy development. Section One contains more detail on the proposed composition and operation of the Road Freight Forum. It is envisaged that this body will track the delivery of the Strategy actions and consider the evolution of the Strategy over time, with the identification of new priorities, actions and enablers as needed. It will also act as a central forum for Government, industry and other stakeholders to address issues for the sector, including the establishment of targeted subgroups where necessary to progress particular topics.

5.4 | Public Consultation

In April 2021, the Department of Transport launched a public consultation on the Road Haulage Strategy to seek stakeholder and citizen views on its development. The topic areas addressed were: COVID-19, Brexit, Sustainability and Decarbonisation, Road Safety, EU Road Transport Policy, Road Infrastructure, Labour Market and Skills and Intermodal Transport. This consultation ended in July 2021 and a total of 43 submissions were received. These submissions were then analysed by consultants from Arup on behalf of the Department of Transport and a summary report was prepared and published by the department based on that analysis.⁴

A second public consultation on a draft version of the strategy ran during November. A total of 27 submissions were received as part of the second consultation. The sections below take account of those submissions and many of the actions and measures proposed in this Strategy come from the stakeholder key suggestions submitted as part of the consultation process.

⁴ [gov.ie - Public Consultation on Ten-year Strategy for the Haulage Sector \(www.gov.ie\)](https://www.gov.ie/publications-and-resources/publication/public-consultation-on-ten-year-strategy-for-the-haulage-sector)





6 | The Seven Policy Themes



6.1 | Brexit, COVID-19 & Crisis management

Context and Background

The haulage and road freight sector plays a vitally important role in Ireland's economy. The sector has faced many challenges in recent years – with Brexit, COVID-19 and the Ukraine crisis all occurring in a relatively short period. This has been compounded by the long-standing labour shortage and skills gap in the industry with a particular acute shortage of HGV drivers.

The above-mentioned crises underline the importance of a fully functioning supply chain, and of the critical role that hauliers, drivers and all those working in logistics and transport play in bringing essential supplies into and around the country. These crises have also highlighted how complex the sector has become and demonstrated the importance of all stakeholders working together – industry, government and international partners, to ensure the resilience of Ireland's supply chains.

Brexit posed significant challenges to the transport sector. As an island nation on the far western edge of the EU, Ireland's trade with continental Europe and beyond operated to a large extent by road through the United Kingdom (UK) via the so-called landbridge. Any additional barriers – be they physical, regulatory, or technical – to the access arrangements previously in place between the UK and Ireland had the potential to disrupt this trade and be detrimental to the overall economy. Planning for Brexit was carried out in parallel for two scenarios – a scenario where there was an agreement between the EU and UK and a no-deal scenario.

All of the identified implications of Brexit were assessed primarily on the basis of national economic impact. As well as an increase in costs experienced by the sector, one of the highest risks identified in the transport sector was the potential disruption to Irish hauliers accessing UK and EU markets. Contingency plans were put in place for both scenarios at national level and at EU level,

including EU contingency legislation aimed at ensuring basic road transport connectivity in a no deal scenario.

The COVID-19 pandemic brought to the fore the globalised nature of supply chains and the importance of international air and maritime connectivity for Ireland. While supply chains, for the most part, continued to function throughout the pandemic, there was significant disruption caused by the temporary but widespread closure of many retail, commercial and other outlets across Europe and beyond, which had a knock-on effect on haulage and freight transport. The availability of shipping containers held up in China following the first set of COVID-19 restrictions created supply chain disruptions globally which endured for many months afterwards.

Early in the COVID-19 crisis, global demand for oil fell to historic lows and oil-producing states cut back production significantly. However, with the arrival of effective vaccines against COVID-19, oil demand began to recover at a much faster rate than expected. This in turn had a significant effect on the price of oil.

Russia's invasion of Ukraine has had further repercussions for the global economy. The move away from using Russian oil and gas has compounded the global oil supply problems of the COVID-19 crisis period and pushed global oil prices even higher. For transport operators, fuel is a major business cost and where it has not been possible to pass on that higher fuel cost to customers, road transport operators are seeing reduced profitability, with some experiencing liquidity issues that threaten the viability of their businesses. In addition, there have been disruptions to trade flows and supply chains for other commodities such as fertiliser and animal feed, as well as scarcity of key input products such as the AdBlue fuel additive for diesel HGVs and limited availability of vehicle parts

in general, affecting price and delivery timelines for new vehicles.

While industry and Government were able to work closely together to identify issues and mitigate

impacts, one of the lessons learned was that the management of emerging crisis situations would likely have been better facilitated by increased data availability.

What has already been achieved?

Brexit

In responding to Brexit the key objective of the Department of Transport was to minimise, as far as possible, the impacts on the transport sector and, in particular on international transport connectivity. In doing so, the Department worked with other Government Departments, the European Commission, Task Force UK and with national sectoral stakeholders across the aviation, haulage and road freight, maritime and public transport sectors on both policy and operational levels.

As well as the general Brexit stakeholder forum, there was regular engagement between Department of Transport officials and haulage and road freight stakeholders at Brexit stakeholder meetings, including participation from the Revenue Commissioners and the Department of Agriculture, Food and the Marine. Additionally, the Revenue Commissioners held a technical workshop with the Irish Road Haulage Association (IRHA) in January 2021 to provide assistance and training on new Revenue systems.

A significant amount of preparedness for Brexit was in place in advance of March 2019 for a potential no-deal Brexit. This included vital contingency measures at EU level to ensure continued connectivity for international road haulage.

Changes brought about by the introduction of border and customs controls between the EU and the UK meant additional controls in Dublin Port and Rosslare Europort on imports and exports from 11.00 pm on 31 December 2020.

The necessary facilities and systems were established prior to March 2019 and subsequently enhanced further to allow these controls to take place, with minimal disruption to traffic flows through both ports.

As part of overall contingency planning, a traffic management contingency plan was prepared

to manage impacts on the Dublin Port Road network. These contingency plans were formulated by the Traffic Management Group, chaired by the Department of Transport, which included representatives from Transport Infrastructure Ireland (TII), Dublin City Council, An Garda Síochána, Office of Public Works, Revenue Commissioners and Dublin Port Company.

In the initial post-Brexit period, the new customs and sanitary and phytosanitary checks at Dublin and Rosslare ports caused some delays for drivers. As part of the national response to Brexit and following requests from the haulage industry, the RSA introduced a temporary derogation from the application of certain provisions of the EU driving and resting time rules from the 1st of January until the 30th of January 2021 to help ease these delays.

As transport operators became more familiar with new systems these problems eased. The table below from the Revenue Commissioners⁵ shows key statistics on the facilitation of trade with Great Britain (GB) in the post Brexit period.

	Number or Amount
New Economic Operators' Registration & Identification (EORI) Registrations	23,265
Customs Trade Facilitation Authorisations issued	540
Customs Declarations Processed	25.4m
<i>Of which were from Great Britain</i>	18.2m
Customs Duty collected	€526m
<i>Of which was collected on GB Imports</i>	€215m
Brexit readiness letters issued to businesses exporting to the UK	6,000
Inbound flow of Lorries & Containers from GB to Ireland	396,895
<i>Of which accompanied</i>	128,142
<i>Of which unaccompanied</i>	268,753
Movements inbound which were Green Routed	86%
Movements inbound which were Orange Routed	11%
Movements inbound which were Red Routed	3%
Import One Stop Shop (IOSS) Implementation: Import VAT from other Member States	€58m

At the end of the Brexit transition, Ireland saw a rapid and unprecedented reconfiguration of its traditional supply chains. New customs obligations drove a surge in the demand for services on direct routes between Irish ports and mainland Europe.

5 <https://www.revenue.ie/en/corporate/press-office/annual-report/2021/headline-results-2021.pdf>

Roll-on Roll-off (RoRo) traffic on these services rose by 94 percent compared to 2020. This demand was driven largely by a reduction in the use of the UK Landbridge. Direct EU traffic now represents one third of all RoRo volume, compared to 17 percent in recent years.

This reorganisation of Ireland's supply chains was greatly assisted by the response of the shipping industry in terms of increasing capacity to match market demand. Operators in both RoRo and Load-on Load-off (LoLo) markets responded to this demand in late 2020 by adding an unprecedented amount of capacity to these direct services. In 2019 Ireland had about 30 direct sailings to and from European ports. Today, there are over 60 direct sailings to the continent and capacity continues to

COVID-19

The re-introduction of internal EU borders, to counter the spread of COVID-19, had an immediate and disruptive impact on European supply lines and general mobility. With the exception of Ireland, all EU Member States applied a temporary restriction on all non-essential travel into their jurisdictions. Most Member States also applied restrictions on internal EU cross-border travel and public transport services. In response to these measures, the EU Commission established a network of national contact points for transport to monitor developments at borders in all Member States and between the EU and third countries, and to update on transport measures or restrictions adopted by each Member State.

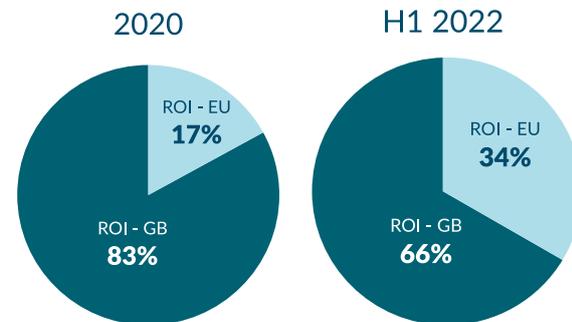
On 23 March 2020, the Commission published a communication calling for the establishment of Green Lanes at internal EU borders. These Green Lanes are border crossings open to all freight vehicles where any checks or health screenings should take no more than 15 minutes. This communication also called for the suspension of national restrictions on the freedom of movement of transport workers across EU borders.

On 28 October 2020, the European Commission extended the Green Lanes approach to ensure the inclusion of other modes of transport including rail, waterborne freight, and air cargo. In addition, the Commission provided further guidance on issues such as electronic documentation, and the availability of rest and refuelling points.

At the domestic level, there was regular engagement

be added. That this market continues to provide uninterrupted connectivity to international markets for Irish importers and exporters is evidence of its resilience, agility and flexibility.

The extract below from the Irish Maritime Development Office Unitised Traffic Report⁶ shows the changes overall in roll on roll off traffic from Ireland to GB and EU –



between Government and sectoral representatives from the early stages of the COVID-19 crisis. Measures put in place to help support the continued functioning of the haulage and freight sector included:

- Guidance to help protect supply chain workers, maintain the supply of medicines, equipment, food, and other essential goods and to help mitigate the economic impact on businesses of necessary public health measures. This guidance applied to road transport operators, maritime workers, pilots and aircrew and all others involved in the maintenance and repair of critical infrastructure.
- Extensions of the validity of Irish Driver Certificate of Professional Competence (CPC) cards which expired during the COVID-19 outbreak, as well as extensions for vehicles with a Commercial Vehicle Roadworthiness Test or a driving licence that was due to expire.
- Temporary derogations from certain provisions of the EU drivers' hours rules from March to May 2020 and during January 2022. At the request of industry, the Road Safety Authority (RSA) and the Department of Transport agreed to allow a temporary derogation in respect of certain provisions of the EU driving and resting time rules. The derogations were designed to assist in ensuring that key supply chains for food and essential goods were kept open. They applied to all operators and drivers subject to the EU driver's hours and tachograph rules who were engaged in the carriage of goods.

⁶ [IMDO Q2 2022 Unitised Traffic Report FINAL.pdf](#)

- Free COVID-19 testing for commercial drivers travelling to France in early 2021. On 28 January 2021, the French Government introduced a legal requirement for commercial drivers travelling on ferries from Ireland to France to have proof of a negative COVID-19 test result, from either a PCR or antigen test, obtained within 72 hours prior to embarking on a ferry journey to France. In response to this, the Government introduced a system of free testing for drivers travelling to continental Europe at sites close to the three Irish ports with direct maritime links with the rest of the EU (Dublin, Cork, and Rosslare). This free testing ran for a 12-week period, from 27 January to 21 April 2021.

Additional measures to assist the sector during the pandemic included the publication of other practical documents, such as workplace guidance on how to manage business continuity, a communication regarding access to sanitary facilities and motorway services, a summary of motorway service area facilities and guidelines for cleaning HGVs. While many haulage and freight businesses experienced high volumes of demand during the COVID-19 pandemic, financial supports were also available for businesses that needed them, including the Credit Guarantee Scheme, the COVID-19 Working Capital Scheme, Microfinance Ireland COVID-19 loan finance, COVID-19 Loan Scheme (CLS), Wage Subsidy Payments and Pandemic Unemployment Payments.

At EU level there has also been recognition of the need to ensure the normal function of the

Ukraine Crisis

Ireland remains resolute in its solidarity and support for Ukraine and the Government is committed to helping Ukrainians who have been displaced by war. Work is ongoing with European and international partners to address the humanitarian crisis and accommodate Ukrainian nationals now living in the EU, including in Ireland.

The secondary impacts of the conflict have also required Government action - on energy security and fuel cost, both fundamental for the operation of haulage and freight businesses.

Soon after the conflict began, the Department of the Environment, Climate and Communications (DECC) established an Energy Security Emergency Group (ESEG) to address Ireland's energy security

Single Market in times of crisis. [The Single Market Emergency Instrument \(SMEI\) \(europa.eu\)](https://europa.eu) was proposed by the Commission in September 2022. The SMEI aims to provide a framework which will preserve the free movement of goods, services and persons and the availability of essential goods and services in the event of future crises and will work to improve the structural shortcomings which were identified during the COVID-19 pandemic. The framework proposes to provide a toolbox of crisis response measures from contingency planning up to a single market emergency, which would be activated by a Council decision if a crisis led to a severe impact on the Single Market. The intention is to ensure the coordination, solidarity and coherence of the EU crisis response and protect the single market's functioning, ensuring:

- Continued free movement of goods, services & people
- Smooth-running supply chains
- Availability and access to goods & services.

The SMEI proposal will be progressed through the normal EU legislative procedure with negotiations to agree the final adopted position taking place in the Council of the European Union and the European Parliament. The Department of Enterprise, Trade and Employment (DETE) will represent Ireland at negotiations on the Commission's proposals. During October 2022, DETE held a public consultation on the proposed EU instrument and responses to that consultation will help inform the position to be taken by Ireland in these negotiations.

needs in the context of the war in Ukraine. The ESEG is coordinating and overseeing national-level activity and responses in relation to the impact of the war on energy security. The group includes representatives from DETE, the Department of Transport, the National Oil Reserves Agency (NORA), the Commission for Regulation of Utilities, Gas Networks Ireland, EirGrid and the Sustainable Energy Authority of Ireland (SEAI).

In April 2022, the Government published the National Energy Security Framework, which coordinates work on energy security across the oil, gas and electricity sectors, and sets out a 'Whole-of-Government' response to energy security, including a key focus on energy affordability.

The Framework sets out the government's action in response to these issues under key headings:

- Managing the impact on consumers and businesses;
- Ensuring security of energy supply in the near-term;
- Reducing dependency on imported fossil fuels;⁷

Ireland is reasonably well insulated overall from direct supply shocks, as few imports of crude oil and a comparatively small proportion of Ireland's refined product originate in Russia. In the time since the conflict began, Irish importers have voluntarily moved away from imports of oil originating in Russia.

DECC and NORA work closely with the oil sector to plan and prepare for issues in relation to oil supply. This includes the release of strategic oil stocks, which is done on the direction of the Minister for the Environment, Climate and Communications under powers assigned to them in the National Oil Reserves Agency Act 2007. The release of stocks may be done in conjunction with other member countries of the International Energy Agency, as was the case in early March and early April 2022 when Ireland participated in coordinated International Energy Agency releases as a response to pressures that arose from the onset, and continuation, of the war in Ukraine, particularly in relation to the supply of diesel.

There are several relevant plans in place which include:

- NORA Stocks Drawdown Plan which sets out how, in the event of a release of strategic oil stocks, the stock would be distributed to the oil sector
- The Oil Emergency Response Plan which sets out the procedures for responding to an oil emergency
- The Oil Emergency Allocation Schemes, which are a component of the Oil Emergency Response Plan, detail how Government can activate and implement appropriate measures to ensure the supply of oil products to critical, priority end-users.

The most immediate impact of the war in Ukraine on Ireland's energy supply was a rapid and significant increase in the price of energy. There was a sharp

increase in the wholesale price of oil and knock-on increases in the retail price of oil products for consumers and businesses. Central Statistics Office (CSO) figures showed an increase in the price of diesel of 17.3 percent from February to March 2022. In response to this sudden peak, on 9 March 2022⁸, the Minister for Finance announced a temporary reduction on the excise duties charged on petrol, diesel and marked gas oil, reducing excise duty by 20 cent per litre of petrol and 15 cent per litre of diesel. This offset some of the increase in fuel costs for all citizens and businesses.

Fuel comprises a larger proportion of overall business cost for haulage businesses providing hire or reward services. In recognition of this and of the important role the haulage industry plays in the supply of essential goods, into and around the country, on 11 March 2022 Government announced an emergency support measure for licensed hauliers, the Licenced Haulage Emergency Support Scheme (LHESS). The LHESS was a temporary grant scheme which provided a payment of €100 per week, for 8 weeks, for each heavy goods vehicle listed on an operator's road haulage licence. Some 80 percent of licensed operators applied for the Scheme and over €15.6 million in support was paid out. The Scheme closed on 6 June 2022.

Russian oil accounted for 37 percent of EU supplies in 2020. This percentage is now declining, and Russian oil will be phased out in line with EU sanctions by the end of 2022. This has caused a tightening of supply, and oil prices remain high. Government supports include the excise duty reduction, which in Budget 2023 was extended to 28 February 2023, the LHESS and the Diesel Rebate Scheme, which is also available to licensed hauliers. Haulage businesses have also been encouraged to revise and renegotiate contracts to reflect higher fuel prices.

Government will continue to monitor fuel prices and the impacts on haulage and freight businesses as the crisis in Ukraine continues.

⁷ More information on the National Energy Security Framework is available here - gov.ie - [National Energy Security Framework \(www.gov.ie\)](http://gov.ie)

⁸ <https://www.cso.ie/en/releasesandpublications/er/cpi/consumerpriceindexmarch2022/>

Short-Term Priorities

Communication between Government and Stakeholders

Although it is recognised that supply chains, for the most part, continued to function throughout these global crises, communication by Government and pro-active engagement with stakeholders is considered vital in a time of continuing international uncertainty. The public consultation for this strategy underlined this importance of this aspect to the sector.

The response to the above crises and challenges have shown that close engagement between Government actors and stakeholders can identify practical and effective solutions in support of the sector and its role in maintaining Ireland's essential trade and supply lines.

The regular engagement between Government officials and stakeholders that took place at the Brexit Haulage Stakeholder meetings proved a very valuable. The engagement ensured that emerging issues were dealt with promptly and provided an opportunity for industry to play a role in the development of policy. As Ireland will undoubtedly face further crises in the future, it is important that appropriate engagement structures are in place on an ongoing basis.

A central short term priority action for this Strategy is therefore the creation of a Road Freight Forum, with representation from relevant Government Departments, agencies and the haulage, freight distribution and logistics sector.

It is expected that the Road Freight Forum will meet three times a year to share perspectives and address issues of common interest. Additional meetings in response to crisis events could also be considered to ensure that sectoral perspectives are heard.

The Forum will play a central role in facilitating the implementation of this Strategy, leading collaboration among stakeholders on relevant actions, reviewing action outcomes and formulating new actions and priorities as needed.

The Road Freight Forum will link to the already established Brexit Stakeholder forum to continue engagement as needed on customs and sanitary and phytosanitary controls related to Brexit. The Road Freight Forum will also allow for engagement on Ireland's participation in the Specialised Committee on Road Transport under the EU-UK Trade and Cooperation Agreement and for the sharing of industry perspectives on other EU legislative proposals and policy matters of relevance for haulage and road freight.

The Road Freight Forum will also link to the already established Logistics and Supply Chain Skills Group as described in section 6.7 to consider skills issues of relevance for the sector.

Relevant Government Departments represented on the Forum will link to the Government's wider emergency planning structures in respect of severe weather, future pandemics and other emergencies, and would represent the sector on those national structures.

Action 01

Establish a Road Freight Forum with representatives from relevant Government Departments, agencies and the haulage, freight distribution and logistics sector

D/Transport

Mapping Data Availability

The successive crises of Brexit, Covid and Ukraine not only demonstrated the need for improved communication among stakeholders, they also exposed the need for improved data collection and sharing in order to support evidence informed policy making. The Department recognises the need to improve in the area of data analytics. In the

course of the consultation on the Strategy, it was highlighted by many stakeholders that while the use of telematics data by industry is widespread, data are usually siloed and company-owned and can be commercially sensitive. So, while the sector is in one sense, 'data rich', the quantity of data available to policymakers and researchers that could help to

improve the evidence base is poor.

Both Transport Infrastructure Ireland and the National Transport Authority hold data sets which are of relevance for road freight. Both NTA and TII have emissions models for road transport but further refinement is needed to better represent the heavy goods vehicle fleet and improve how models these can be used to assess potential measures to decarbonise the movement of goods in Ireland.

In order to ensure that policy development and crisis planning is best targeted there is an immediate need to map the data which is currently available and identify where data gaps exist. To this end, the Department of Transport will support and fund a shared data project involving relevant Government Departments, NTA and TII, academia, and industry to establish current data availability and quality, identify key data gaps and explore how these might be filled. This work is a short-term priority action under this Strategy. Once completed and actioned, the better availability and coverage of data will support delivery of many of the other objectives of the Strategy.

Data gaps which have been preliminarily identified include –

- Composition of the vehicle fleet, in particular engine emission class
- Demographics of drivers/others in the industry – for example age and gender
- Operational data - origin/destination data, concentration of road freight flows, level of empty running, emissions performance of existing fleet.

Action 02

Commission a study to establish current data availability and quality, identify key data gaps and explore at a high level how these might be filled

D/Transport,
NTA, TII,
Industry



Enablers for Long-Term Progress

Data Sharing for Improved Policymaking

Following the completion of the data project to map current data availability (Action 2), the next step will be to engage with stakeholders to identify data sources or data collection points which can be used to fill the data gaps. This will include the evaluation of a data repository for haulage and freight and explore the opportunities this might offer to inform evidence-based decision-making and to test different policy scenarios.

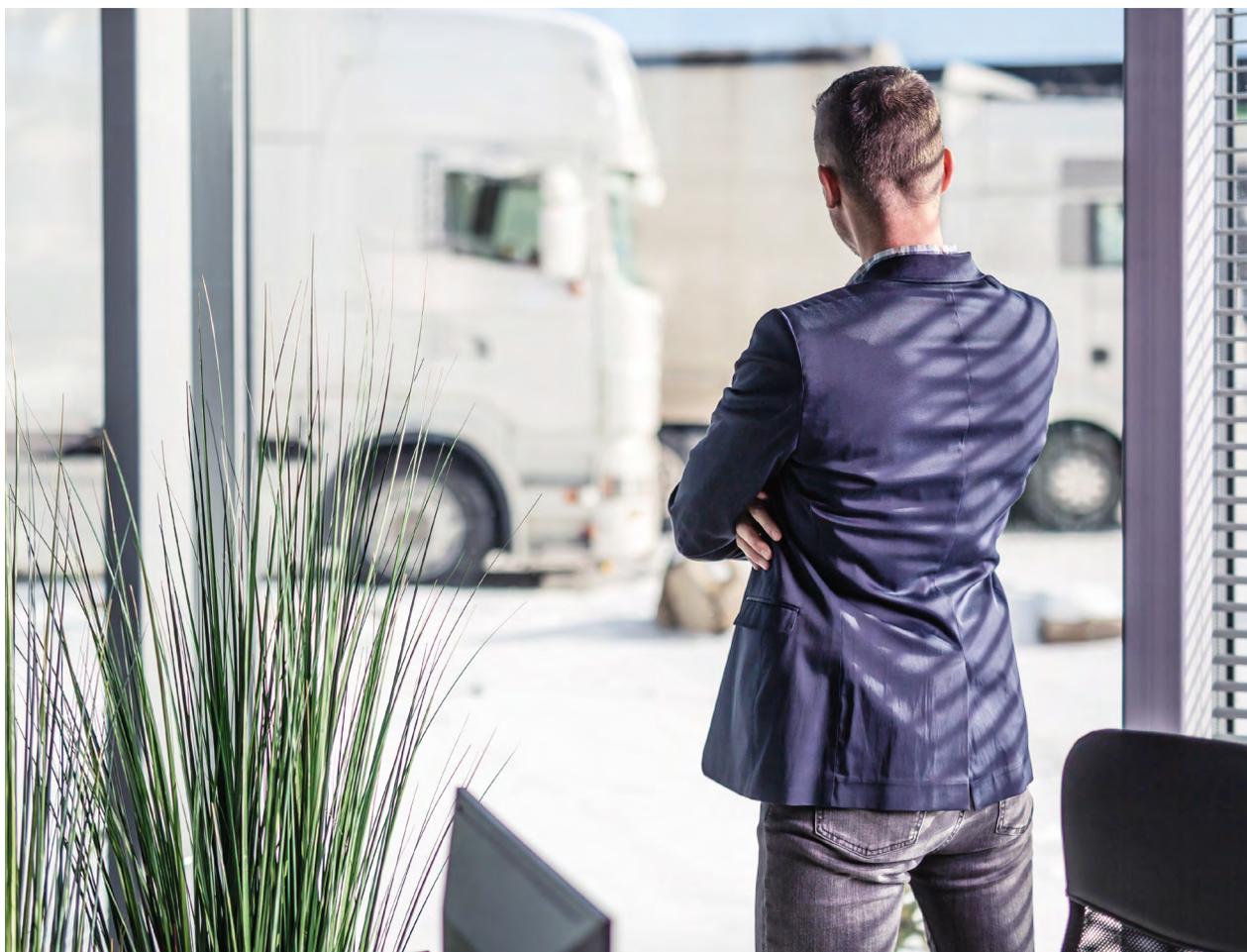
This must be done in a manner that addresses privacy concerns and safeguards legitimate commercial interests as a critical requirement to enable access to corporate data for research and policy evaluation purposes. New modelling tools and more disaggregated approaches that can use currently inaccessible data will help to provide important insights for policymakers.

Sharing and utilisation of traffic and freight data across agencies and with the industry could be strengthened, leading to a better understanding of the key challenges facing the sector and ultimately to the identification of commonly supported solutions.

Action 03

Following completion of the data audit; engage with stakeholders to identify data sources or collection points which can be used to fill the identified data gaps

D/Transport,
NTA, TII,
Industry



2

6.2 | Sustainability & Decarbonisation

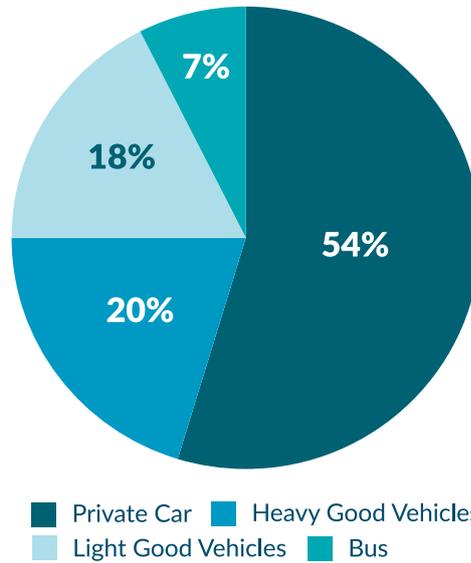
Context and Background

The transport sector overall emitted approximately 10.9 megatonnes (Mt) of carbon dioxide equivalent in 2021⁹, equivalent to 17.7 percent of Ireland’s overall greenhouse gas (GHG) emissions. The main source of GHG emissions from Ireland’s transport sector is from road transport –accounting for approximately 94 percent of all transport emissions in 2021. This includes emissions from private cars, buses and heavy goods and light goods vehicles as shown in the pie chart below.

Transport emissions in 2021 were 24.5 percent below the 2007 peak; primarily due to the continued effect of COVID-19 restrictions, economic downturn and also due to improving vehicle fuel efficiency, the increased use of biofuels and a significant decrease in fuel tourism seen in recent years.

Even with the impact of COVID-19 and widespread travel restrictions, private cars remained the largest source of GHG emissions in the transport sector in 2020 (the latest year for which modal share is available) at 54 percent of road transport emissions. Emissions from HGVs were responsible for 20 percent of total transport emissions, while Light

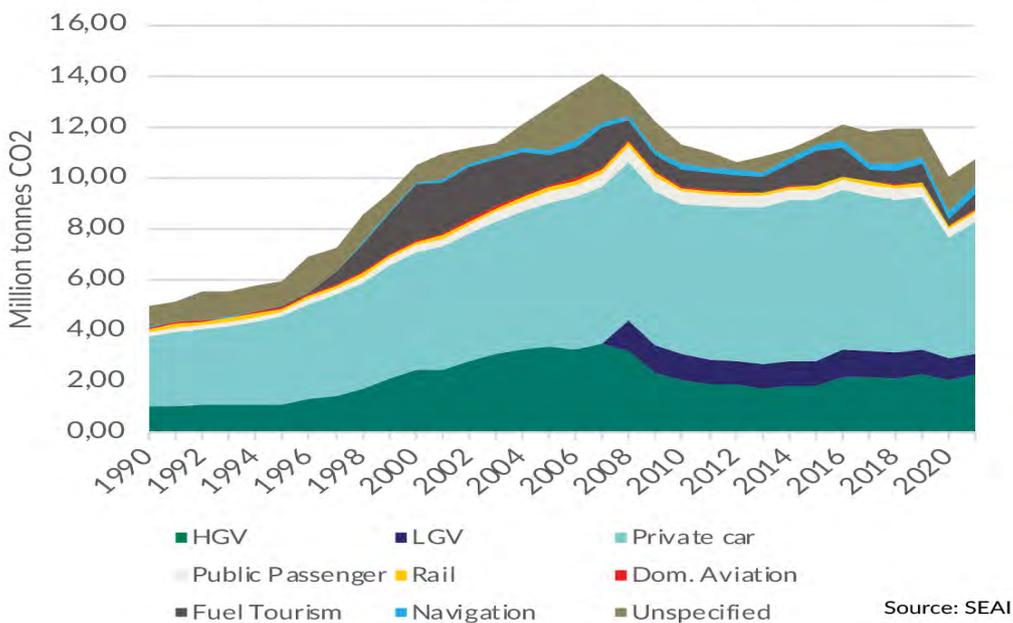
Road Transport Emissions



Goods Vehicles (LGVs) accounted for 18 percent of total emissions.

The chart below shows the evolution of transport CO2 emissions by mode since 1990 based on figures from the SEAI¹⁰.

Transport Emissions by Mode, 1990-2020



9 EPA - Ireland’s Provisional Greenhouse Gas Emissions

10 It should be noted that SEAI and EPA use different methodologies for counting emissions - therefore the two data sets are not directly comparable.

Energy use in the road haulage and logistics sector is strongly influenced by the overall level of commercial and economic activity. Economic activities with high levels of road transport energy use include construction, import/export activity and the delivery of goods to wholesalers and retail. Decoupling growth in freight and emissions growth will be crucial to meet sectoral targets.

Climate Action Plan & Sectoral Ceilings

Under the *Climate Action and Low-Carbon Development (Amendment) Act 2021* ('the Act'), by 2030, Ireland is legally obliged to reduce its greenhouse gas emissions by 51 percent relative to its 2018 emissions baseline. The Act also outlines Ireland's National Climate Objective to work towards a climate resilient, biodiversity rich, and climate neutral economy, which will be realised by no later than 2050.

The Climate Action Plan 2021 set an indicative range of emissions reductions for each sector of the economy. The target set for HGVs was 3,500 low emission vehicles by 2030, representing just under 9 percent of the overall heavy goods fleet (over 3.5 tonnes) registered in Ireland. This target recognised that a large majority of the fleet in Ireland will still be (ICE) vehicles in 2030.

In April 2022, based on recommendations submitted by the Climate Change Advisory Council, the Government adopted a carbon budget programme, covering three five-year periods¹¹, which mapped out a trajectory to meet emissions reduction targets through the setting of economy-wide emissions ceilings. In July 2022, Government further established the level of emissions abatement to be borne by various sectors of the economy, termed 'sectoral emissions ceilings', under the first two of these carbon budgets. These sectoral ceilings place a maximum cap on the volume of greenhouse gas emissions that are permitted by different sectors of the economy in each budget period. Under the Act, relevant Ministers are obligated to ensure that the sectors for which they are responsible pursue policies that are consistent with these sectoral ceilings and are underpinned by actions and measures set out in annual Climate Action Plans (CAPs).

CAP23 is the first climate action plan that will take these legally binding ceilings into account. CAP23 places a greater emphasis on targeting fleet shares and vehicle kilometres rather than absolute

target numbers for low emission vehicles. While the CAP21 target of 3,500 Low emission vehicles remains in CAP23, a further complementary target of 30 percent of sales of new Medium- and Heavy-Duty Vehicles (MHDVs) to be zero emission by 2030 is also set. Further details on the 30 percent target, which covers trucks and buses, can be found on page 42. While this is an ambitious target, it recognises that in 2030 the majority of sales of new HGVs will likely still be internal combustion engine ICE vehicles.

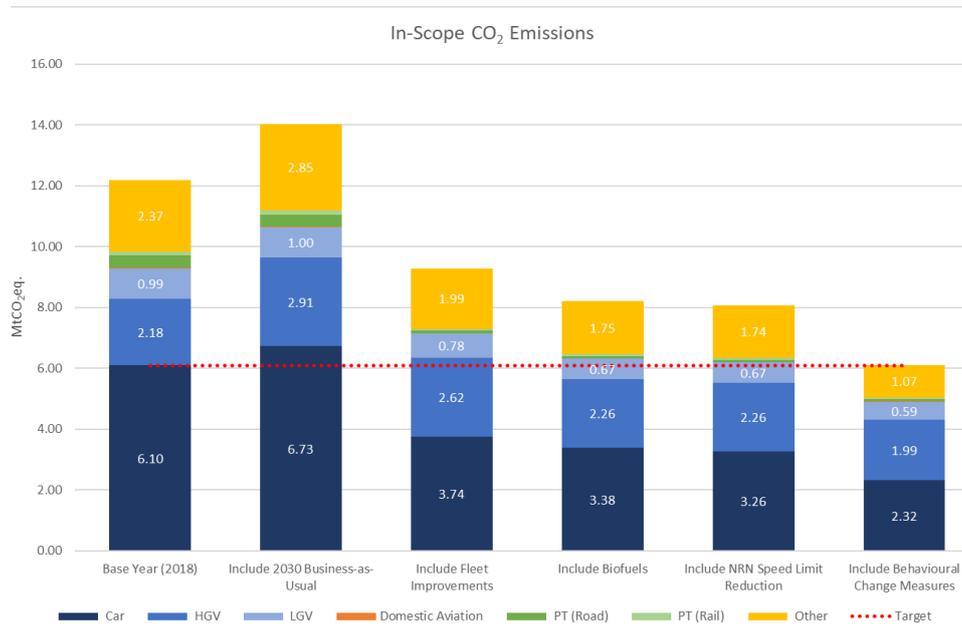
In terms of the sectoral ceiling for transport, it was agreed by Government that the transport sector as a whole would be required to deliver a 50 percent reduction in emissions from the 2018 baseline of 12.2 Mt per annum, to reach an emissions level of approximately 6 Mt per annum by 2030. This legally binding target thus requires a reduction in transport emissions in a manner that is consistent with a sectoral emissions ceiling of 54 Mt for the first carbon budget period (2021-2025), and a further reduced sectoral emissions ceiling of 37 Mt over the second carbon budget period (2026-2030). Modelling work completed for CAP23 has demonstrated that a 50 percent decarbonisation pathway for the transport sector is possible by 2030. It is clear that compliance with the sectoral ceiling for transport will require a truly transformative level of behavioural and systems change, and a fundamental rethink of how both people and goods move across the transport network.

Responses to the public consultation for this strategy demonstrated that there is a high degree of acceptance of the need to decarbonise. However, respondents also emphasised that road freight is a sector which will be harder to abate and requested realistic transition deadlines in which to make the necessary changes. Therefore, it is also important to note that the CAP23 modelling shows, that while the scale of emissions reduction required by the heavy goods sector is significant in the medium term to

¹¹ These periods are 2021-2025, 2026-2030, and with a provisional carbon budget for 2031-2035

2030, the overall burden of achieving the required reduction in CO₂ emissions, to 6 Mt by 2030, will fall to a greater extent on private cars. The chart below demonstrates the scale of reduction required

An Avoid-Shift-Improve approach to transport decarbonisation will underpin CAP23 - it is a hierarchical framework that allows the reclassification of previous CAP actions in a



by the heavy goods freight sector compared to that expected from cars, reflecting the understanding that the heavy goods freight sector is facing a considerable challenge in abating emissions. The modelling assumptions underlying these findings can be found in the documents accompanying the publication of CAP23.

manner that reflects the priority of systemic and behavioural change needed to achieve targets set – thereby drawing a natural focus to the most impactful measures that will need to be prioritised and further scaled-up. The table below describes how the approach fits with the road haulage and freight sector.

AVOID	Integrated transport and spatial planning is critical for climate policy and will bring significant wellbeing co-benefits - promoting safer, low-carbon, and more people-focused transport and acting as a highly impactful long-term determinant of transport sustainability. In addressing the base and future demand for transport through enhanced spatial and transport planning, a reduction in the overall amount of vehicle kilometres can be achieved. A measure which could be considered AVOID is the strategic placement of freight consolidation centres where they reduce the overall number of vehicle kilometres travelled. AVOID measures also include those which reduce the overall frequency of trips so a reduction in the demand for next day deliveries through pricing measures would also be considered an AVOID measure.
SHIFT	The next class of measure, SHIFT, encourages modal shift to more sustainable modes of transport, such as an increase in freight carried by rail or, in some cases, cargo bikes, for when such journeys cannot be avoided.
IMPROVE	This generally refers to technology-based measures that improve the emissions level of freight journeys which remain essential on the transport network, for example, by switching to an alternatively fuelled HGV. Targets for these measures remain challenging and will require continued investment and support as set out below.

Demand side measures will also be necessary to induce the necessary volume of behavioural

changes. Fuel price increase will form an element of those measures in the period to 2030.

EU Green Deal and Fit for 55 Package

The European Green Deal is the EU's long-term plan to make Europe climate-neutral by 2050. This target is enshrined in the European Climate Law, as well as the legally binding commitment to reduce greenhouse gas emissions by at least 55 percent by 2030 when compared to 1990 levels. The European Commission presented its 'Fit for 55' package of legislation in July 2021 to implement these targets.

Road freight will be impacted by a number of the Fit for 55 proposals, including revisions to the Renewable Energy Directive (RED III), CO₂ emissions performance standards for heavy duty vehicles, and most notably the proposed Alternative Fuels Infrastructure Regulation (AFIR). AFIR aims to ensure that the public has access to a sufficient infrastructure network for recharging or refuelling road vehicles or ships with alternative fuels. AFIR contains provisions for the construction of recharging points for electric HDVs and refuelling stations for hydrogen HGVs along the Trans-European Transport Network (TEN-T), which it aims to have completed by 2030. These proposals are still being negotiated at EU level so the precise implications for Ireland are not yet known.

The Commission is also expected to publish a review of CO₂ emissions standards for HDVs (truck and bus) by the end of 2022. Current standards for HDVs require most new trucks to reduce their emissions by 15 percent in 2025, and 30 percent in 2030. More stringent standards will be necessary to align HDVs with the European Climate Law.

While a relatively clear pathway has been identified in CAP23 for the decarbonisation of private and passenger transport emissions, a rapid shift away from the use of fossil fuels and dependence in the approximately 40,000-strong heavy goods vehicle fleet is especially challenging since technological

alternatives to diesel powertrains are not yet widely available.

Though in recent years, there has been a high level of uncertainty as to the likely technological pathway for decarbonising HGVs (e.g., whether compressed natural gas, electric, hydrogen, or other bio- / advanced fuel-types represent the best alternative), this pathway is now becoming clearer, with electric trucks emerging as the preferred technology. However, the path and pace of this transition remains less clear, with ICE vehicles expected to make up a substantial majority of the on-road fleet in 2030 and beyond. Transitional measures, such as the use of renewable transport fuels, will be needed to reduce emissions in existing vehicles while the widespread take up of electric trucks begins towards the end of this decade. Hydrogen as a fuel is not expected to play a significant role in the decarbonisation of the road freight sector before 2030.

Strong public commitments have been made by major original equipment manufacturers (OEMs) to increase the availability and supply of electric trucks to the market by mid-decade.¹² These announcements include, for example, Scania's targets of 10 percent of truck sales to be electric in 2025 and increasing to 50 percent in 2030, Renault Trucks' prediction that 10 percent of their sales volume will be electric by 2025 and 35 percent by 2030 and Daimler's expectation that 60 percent of its truck sales will be zero-emission by 2030. In addition, major OEMs have also announced their commitment to sell 100 percent renewably powered trucks by 2040. Analysis by the European Federation for Transport and Environment of the various announcements made by European truck makers suggests a worst-case scenario of 480,000 Zero Emission Vehicles (ZEVs) on the road in 2030 with a best-case scenario of 630,000.

Scenarios – EU27

	2025		2030	
	Sales shares	ZEVs on the road	Sales shares	ZEVs on the road
Worst-case scenario	4.2 percent	50,000	40.8 percent	480,000
Intermediate scenario	6.9 percent	80,000	43.3 percent	560,000
Best-case scenario	9.2 percent	106,000	46.5 percent	630,000

¹² [202108_truck_CO2_report - clean copy \(transportenvironment.org\)](https://www.transportenvironment.org/publications/202108-truck-co2-report-clean-copy)

The European Automobile Manufacturers' Association (ACEA) estimate that there are more than €6.2 million trucks in circulation in the European Union¹³. Therefore, under the best-case scenario with new sales volumes at 46.5 percent electric trucks in 2030, this represents approximately 10 percent of the total fleet.

Since there is now good consensus that Battery Electric Vehicles will play a key role in decarbonising heavy goods freight, it is important that the right mix of policy, regulatory and incentive measures are put in place to support this.

Fire Safety & Battery Electric Vehicles on Ships

As part of the consultation on this Strategy, some stakeholders raised concerns regarding the future of Battery Electric Trucks and their safe use in maritime transport.

LASH FIRE is an international research project, running from September 2019 to August 2023, aiming to significantly reduce the risk of fires on board ro-ro ships. One LASH FIRE report examines the latest available data and research on battery electric vehicles and concludes that BEVs are not more hazardous than internal combustion engine vehicles, but the risks of Lithium-ion batteries differ to those of conventional fuels.

Just as there are systems in place to deal with fires in conventional vehicles, there is a need to learn how best to deal with fires in battery electric vehicles and adapt systems. As needed in this regard. The LASH FIRE project has identified a number of work packages towards the achievement of this goal – cooperation and communication, formal safety assessment, ship integration, effective manual operations, inherently safe design, ignition prevention, detection, extinguishment and containment.

For more see lashfire.eu | *Legislative Assessment for Safety Hazards of Fire and Innovations in Ro-Ro Ship Environment*

It will take time for Battery Electric Vehicles to become widely available and affordable across Europe. Ireland's peripheral status, as well as the requirement for right hand drive vehicles, could lead to a slower uptake in Ireland. Given the additional impetus to decarbonising the sector provided by the high levels of ambition set out in national targets and the time it will take for battery electric trucks to become available and affordable, interim non-technological solutions and complementary measures will need to be implemented in the short-to medium-term to meet the required emissions abatement targets. Biofuel blending, where renewable fuels are mixed into liquid fossil fuels, will play a large role as a transitional measure in the short term that will help to reduce emissions in both passenger transport and road haulage. Improving logistical efficiency through reducing congestion and overall demand, and via more sustainable practices, such as eco-driving, mode shift and better integrated delivery services will all be key to reducing emissions and fuel costs.

The increase in biofuels is currently one of the main pillars of land transport decarbonisation under the Climate Action Plan. Since 2010, increasing volumes of biofuels have been introduced to the

Irish conventional fuel mix through a blending obligation on fuel suppliers. The obligation ensures that a certain percentage of the motor fuel placed on the market comes from renewable sources, for example bioethanol and biodiesel. In 2021, approximately 246m litres of biofuel, was placed on the market.

Biofuels will remain a core transitional measure for medium-term reduction of greenhouse gas emissions in road transport. This is particularly so for hard to abate sectors such as HDV, where alternative transport energy and technology are at early and varying stages of development. At present, the main means of producing sustainable liquid biofuels is through the use of tallow and used cooking oil, which is the main feed stock for Hydrotreated Vegetable Oil (HVO). While HVO and other sustainable biofuels are used in the ongoing decarbonisation of the road transport fleet, they are also in demand across other transport sub-sectors, for example in the manufacture of Sustainable Aviation Fuels (SAFs) and in other sectors, for example in industry and home heating. As a drop-in biofuel that can be used to replace conventional diesel in fossil-fuel combustion processes,

¹³ https://www.acea.auto/files/trucks_fact_sheet_ACFA.pdf

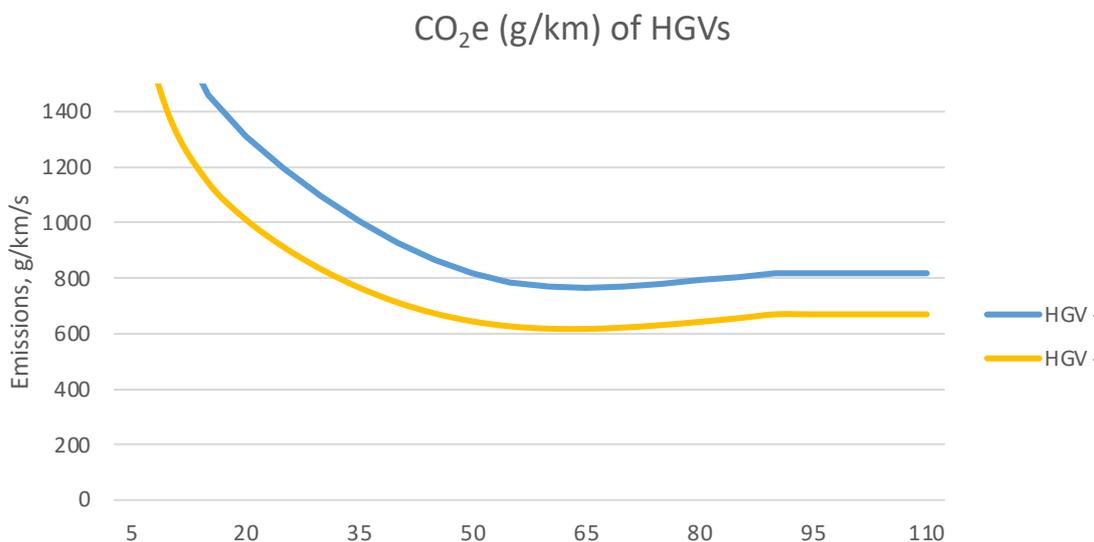
HVO in particular is in high demand as a globally traded commodity on the open energy market. As indicated by the recently published Department of Transport [biofuel study report](#) on the sustainability and availability of renewable transport fuels, one of the key challenges for increasing the supply of biofuels, including HVO, is ensuring sustainability and availability. The study projected an estimated consumption of biodiesel, including HVO, of between 570-730m litres under a 20percent biodiesel (B20) by 2030 blending scenario. There is potential for indigenous production to scale up to between 435m and 735m litres of biodiesel/HVO in 2030, but with low recoverable feedstock supplies¹⁴ reliance on imported feedstocks (used cooking oil and tallow) will continue to be high. Therefore, while it is currently possible for a transport operator to rely upon 100 percent HVO, there are affordability and availability issues including competition from other sectors for the same renewable fuels, as well as fluctuations in global feedstock prices and demand.

Supply of used cooking oil is limited and additional demand for it will impact on its cost and may heighten the risk of fuel fraud in global supply chains. To combat this the EU is introducing more rigorous verification requirements including

Similarly, while biomethane has the potential to be used up to 100 percent in road transport vehicles, there are also availability and affordability issues associated with this, given wider cross-sectoral demand. To support the wider availability of biomethane and its decarbonisation potential, the Climate Action Plan in setting out alternative pathways for the agriculture sector, is seeking to increase Ireland's capacity for anaerobic digestion to 5.7 Terawatt-hours by 2030. This could have benefits for the production and supply of biomethane available for road transport. To maximise these benefits, the Department is seeking to incentivise supply of biomethane through multiplier renewable transport fuel certificates that can be awarded in the future for its supply in the transport sector, subject to legislation.

Improving logistical efficiency through reducing congestion and overall demand, and via more sustainable practices, such as eco-driving, mode shift and better integrated delivery services will also be key to reducing emissions and fuel costs.

Congestion and low speeds result in higher emissions from HGVs, as shown below. This is a particular issue on busy roads such as the M50 with a large proportion of heavy vehicles and occasional flow breakdown.



an EU database for all biofuel supply. In this regard, the Department of Transport is engaged with the European Commission on an ongoing basis, including through the working group on sustainability, set up under the Renewable Energy Directive.

Examples of interventions which are being made to reduce this effect include the dynamic traffic management project on the M50 which is being rolled out on a phased basis using variable speed limits and the provision of traffic/congestion information leading to reduced variability in journey time and better lane distribution. It is also

¹⁴ There is the potential for 70 million litres of biodiesel from indigenous feedstock

key to ensure car drivers, who currently share roads with goods vehicle traffic, have alternative transport options such as safe active travel infrastructure and public transport. This could help reduce congestion which in turn would reduce emissions from HGVs. This approach is particularly important for the sections of national road network with the greatest volumes of goods vehicles.

The increased role of consolidation and distribution centres, zero-emission LGVs and e-cargo bike solutions, will also be an important component of how the 'last-mile' elements of urban and home deliveries are decarbonised. The development of approaches and actions to decarbonise last-mile deliveries – including switching from heavy-duty to sustainable mobility transport options such as electric LGVs, e-cargo bikes, and shared delivery services – have been identified as having both carbon and air pollutant reduction co-benefits, particularly in urban areas.

As set out in sections 6.3 & 6.4 – greater use of more sustainable modes, better transport planning and intermodal solutions will be important. While the current limitations of rail freight infrastructure and the absence of commercially viable inland waterways in Ireland restricts the overall potential to rely on mode shift from road haulage in the short to medium term, the All-Island Strategic Rail Review is examining all aspects of inter-urban and inter-regional rail connectivity on the island of Ireland, including an analysis of rail connections to the major sea

ports and airports, and the future use of the rail network for freight movements. It is anticipated that a draft report from the Review will be ready in 2023, with publication to follow once it has received appropriate Ministerial approval in both Ireland and Northern Ireland.

Finally, in terms of the industry's response to the public consultations on the development of this Strategy, there is a high level of interest and clear willingness and acceptance by industry of the part that they must play in supporting the decarbonisation of the haulage sector, which featured as a high priority for a majority of industry members. However, what also emerged strongly from the consultation was the need for further Government support and for the creation of a roadmap detailing the steps necessary to help decarbonise the sector in a way that provides greater levels of business certainty.

In the following section, a synopsis is provided of what is currently being done to support the decarbonisation of heavy goods freight, before setting out a variety of measures and policy instruments that can be implemented in the short term to help improve efficiency and to reduce emissions, before discussing the longer-term enablers for decarbonisation.

As road infrastructure and intermodal freight are discussed in Sections 6.3 and 6.4 in greater levels of detail, consideration here is given to road haulage and freight only.

What has already been achieved?

As set out above, the core measures and headline targets for the road haulage sector listed in CAP23 primarily involve shifting to low-carbon fuel technology and increasing the share of biofuel blending.

Comparing these targets relative to December 2021 fleet data, when there were 385,099 goods vehicles on the road, approximately 1,980 light goods vehicles were fully battery electric (BEV), or plug-in hybrid vehicles (PHEV) while there were around 90 low-emission HGVs on Irish roads. In both cases, these levels account for just 2 percent of the 2030 targets and significant uptake will be required over the coming years.

CAP21 sets out the initial pathway to decarbonising transport, and the publication of the Climate Action Plan 2023 will set out additional measures, but it is clear that urgent implementation of all climate action plan measures and policies, in addition to the identification of further additional measures will be required to avoid falling below the legally required level of emissions abatement. However, there has been good progress to date on a variety of measures, as set out below.

Biofuels Obligation Scheme and Renewable & Advanced Fuels for Transport Policy Statement

Renewable transport fuels represent an important transitional measure on the pathway to a fully decarbonised fleet, and can help to deliver emissions abatement in road haulage, while improved technology options develop. The deployment of biofuels has been the primary mechanism used to date to increase the share of renewable energy in the transport sector. It has made a significant contribution to reducing emissions. In 2020, 239 million litres of biofuels replaced about 209 million litres of fossil fuels, avoiding approximately 520 KtCO₂eq. of emissions.

The Biofuels Obligation Scheme, administered by NORA, has been in place since 2010. Under the scheme, suppliers of certain fuels to the road transport market are required to include a certain proportion of biofuels, which must meet strict sustainability criteria, as part of their fuel mix. The scheme has been the primary policy measure used to increase the share of renewable energy in the transport sector and has also made a significant contribution to reducing greenhouse gas emissions. The current biofuel obligation rate (which will be renamed the renewable transport fuel obligation in 2023) for the 2022 obligation period is 13 percent by volume.

The biofuels currently included in the scheme are biodiesel (blended with diesel), bioethanol (blended with petrol), liquefied petroleum gas (BioLPG43) and biomethane.

The Renewable Fuels for Transport Policy Statement, which was published by the Minister for Transport in November 2021, sets out a roadmap for the supply and use of renewable fuels in the transport sector in order to meet targets set out

in CAP21 and under European obligations for renewable energy supply and use in transport.

Commitments contained in the policy refer to increases in the supply of biofuels commencing in 2022, which for the haulage sector will relate to increases in the level of biodiesel use from approximately 7 percent (B7) to 20 percent (B20) levels by 2030; as well as a commitment to ensuring the maintenance of the highest standards of sustainability of the biofuel supply from source, and incentives to develop and supply a wider range of renewable fuels. The Policy Statement also provides a framework for an ongoing process of consultation and review regarding the longer-term changes proposed. HVO will be essential in meeting the B20 blending target in diesel, as it is a biofuel that can be blended in diesel beyond the B7 blend wall for biodiesel.

In October 2022 'A Review of Requirements and Constraints on Biofuels in Ireland arising from RED II and National Targets'¹⁵, which was prepared for the Department of Transport, was published. The study assessed the future demand and supply of biofuels under ambitious climate action plan targets and illustrates for biofuel and related feedstock the supply and production needed in 2030 to meet the blend targets (B20, E10). The Report concluded that both targets can be complied with by 2030 through meeting and possibly exceeding advanced biofuel targets.

The continued contribution of biofuels towards Ireland's commitment to reduce greenhouse gas emissions will continue to be subject to analysis and review.

Eco-Driving

Eco-driving is an important transitional measure to help to reduce emissions and fuel costs, as well as improving road safety and providing upskilling opportunities for HGV drivers. ICE engines are expected to make up the majority of the fleet until at least 2030 and soft measures such as eco-driving will play an important role in reducing emissions in the medium term. Stakeholder consultation carried out during a Department of Transport and TII co-sponsored freight decarbonisation study also

identified eco-driving as a possible way of reducing carbon emissions from Irish HDVs. Eco-driving is the practice of driving in a way that minimises fuel consumption and the emission of carbon dioxide. Fuel costs are a significant expense, accounting for between 35-40 percent of operating costs for vehicles¹⁶, with lower fuel burn also helping businesses and private motorists to reduce running costs. In the HGV sector, it is implemented through driver training, supported by the use of telematics

¹⁵ [Review of Requirements and Constraints on Biofuels in Ireland](#)

¹⁶ [ETAL - Managers Guide to Distribution Costs 2022](#)

to track vehicle speeds, stop-start patterns, and fuel consumption.

As well as cost efficiency and roads safety co-benefits, international research, and a recently published Department of Transport co-funded study¹⁷ indicate that eco-driving can generate possible carbon savings of between 2 percent and 15 percent, depending on the types of programmes

implemented and on the adoption of eco-driving techniques by individual drivers. Eco-driving is among the climate mitigation measures being supported by the Climate Action Fund through the Three County Energy Agency's 'Greener HGVs' project which offers a grant of up to 30 percent of the cost of installing smart telematics hardware and software in eligible vehicles.

Incentivising Fleet Transition – the Alternative Fuels Heavy Duty Vehicle Grant Scheme

While the public consultation on this Strategy saw calls for Government to support the replacement of older, more polluting vehicles in the current commercial fleet with more modern EURO VI (and future EURO VII) diesel alternatives, it must be noted that Ireland is subject to strict European mandates on the elimination and phase-out of fossil fuel subsidies. The clear direction of European policy is away from supports for diesel powered vehicles and any proposed schemes would be highly unlikely to be approved under recently revised State Aid Guidelines. However, the transition to electric vehicles is expected to take time in the Heavy Goods Freight sector and ICE vehicles will continue to make up the majority of the fleet in the medium term.

Thus, in order to assist road transport operators in transitioning to more environmentally friendly vehicles, the Department of Transport launched the Alternatively-Fuelled Heavy-Duty Vehicle (AFHDV) Purchase Grant Scheme in March 2021. The scheme is administered by TII and supports the purchase of new alternatively-fuelled large vans, trucks, buses, and coaches, providing a percentage of the difference in purchase price between conventional HDVs and their alternatively-fuelled equivalents.

In 2022, grant support was available for the purchase of AFHDVs of the following fuel types

- Compressed Natural Gas, Liquefied Natural Gas, Battery Electric Vehicles, Plug-in Hybrid Electric Vehicles and Fuel Cell Electric Vehicles.

Maximum grant levels for eligible vehicles depend on the size of the company or enterprise applying for the grant, and on the fuel type of the vehicle that the applicant wishes to buy, with grants ranging from 40 percent to 60 percent of the price differential. €3m was allocated to this scheme in both 2021 and 2022, with €3 million also planned for 2023. As these direct grants support the transition of energy-intensive vehicles to cleaner engines, there is a strong motivation for this scheme to scale up commensurate with the level of industry demand. In total 53 applications for trucks have been approved for funding from the scheme. This included 37 in 2021 and 16 in 2022. Of these applications, 38 were for CNG vehicles with the remaining 15 application were for electric vehicles (EVs) of varying weights.

It should be noted that due to expected changes in European Commission 'State Aid' rules, it is expected that grant support will no longer be available in 2023 for CNG and LNG vehicles or refueling infrastructure. Confirmation of that approach is expected in Q1 2023.

The Low Emission Vehicle Toll Incentive or 'LEVTI' Scheme

The Low Emission Vehicle Toll Incentive or 'LEVTI' Scheme, which offers toll discounts for alternatively-fuelled vehicles, was introduced in July 2018. It is expected to run until 31 December 2022, or up until it has supported a maximum of 50,000 Low Emission Vehicles. Alternatively-

fuelled heavy-duty vehicle technologies eligible for support under the Scheme in 2022 included CNG, FCEV and battery electric technologies. Eligible vehicles can qualify for up to a 50 percent discount on tolls up to an annual cap of €1,000.

17 [Climate Change | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/)

Zero Emission Vehicles Ireland

The Zero Emission Vehicles Ireland (ZEV) office was launched in July 2022 and will have an important role in facilitating the haulage sector's transition to a low-carbon future.

ZEV holds overall responsibility for the delivery of the Government's commitments in respect of the transition to electric vehicles for private cars and vans and will lead on the development and deployment of Ireland's EV charging infrastructure strategy. The four key workstreams of ZEV encompass:

- Strategy and policy: overall ZEV strategy, cross-departmental working groups such as the Electric Vehicle Policy Pathway Group, coordinating activity in relation to regulation and taxation for EVs, coordination and monitoring of EV targets, input to Climate Action Plans, management of EU files.

- Vehicles: incentivising uptake of electric cars, taxis, light goods vehicles and low- and zero-emission heavy goods vehicles.
- Infrastructure: delivering the infrastructure to support the uptake of EVs.
- Engagement: leading on public and stakeholder engagement in relation to electric and zero-emission vehicles.

Key mechanisms that can help to decarbonise road freight are already being implemented by ZEV, including the establishment of an industry forum to develop measures to incentivise the take-up of 95,000 electric vans and engagement with stakeholders and ESB networks on the development of high-capacity charging points along the Irish road network.

Global Memorandum of Understanding on Zero Emission Medium and Heavy-Duty Vehicles

Accelerating the replacement of older, more polluting ICE vehicles in the commercial fleet will be key to the sector's decarbonisation. An important aspect of this, as indicated in the feedback received during the public consultation for this Strategy, is for Government to set out a clear policy signal to both industry and the major OEMs regarding the level of future demand and supports that can be expected.

Building on similar declarations that were made at COP26 on achieving an accelerated deployment of zero-emission passenger and light-duty vehicles, Ireland joined like-minded states at COP27 in the signing of a Global Memorandum of Understanding (MoU) on Zero-Emission Medium and Heavy-Duty Vehicles.

This MoU sets out a global commitment to achieve a minimum of 30 percent of all new MHDV sales (bus and truck) to be zero-emission by 2030 and

100 percent by 2040. Average sales of MHDV over the period 2014-2021 (weights >3,500 kg) suggest an average of 2,700 new registrations per annum. An assumption of 10 percent growth in sales to 2030 would see new registrations of approximately 3,000 per year, approximately 900 of MHDVs sold in 2030 would therefore be required to be zero-emission in order to comply with the MoU's 30 percent target. It is important to note that the target figure of 900 would include sales of new buses.

This signal gives Irish haulage and logistics operators greater clarity for their own investment decisions, and OEMs can be incentivised through assurances of greater global demand to scale up and accelerate their own deployment schedules. Through such economies of scale, these actions can help to reduce total investment costs that may fall back to operators.

Improving Urban Logistics and Last-Mile Delivery

As in passenger transport, enabling the freight sector and businesses to avail of cleaner and more efficient delivery alternatives will be necessary to reduce Ireland's transport emissions and meet climate goals as well as meeting industry concerns about unnecessary delays and providing certainty

on daily workloads.

The development of approaches and actions to decarbonise last mile deliveries - including switching from heavy-duty to sustainable mobility transport options such as electric light goods

vehicles, e-cargo bikes, and shared delivery services - have been identified as having both carbon and air pollutant reduction co-benefits as well as generating efficiencies that can reduce unnecessary delays for drivers (either with loading/unloading or being stuck in congestion) This could help to give greater certainty on daily workloads and perhaps encourage more people into the industry.

Electrification is already a commercially viable option for last-mile deliveries in towns and urban centres and An Post has demonstrated the benefits that can be realised by businesses who make this shift. Recognised as the first postal service in the world to attain zero-emission delivery status in

all major cities, An Post has rolled out over 1,300 EV charging points across the country, achieving savings in excess of €1.5 million in fuel costs through better fleet efficiency.

A number of local authorities have also initiated e-cargo bike pilot schemes and trials for businesses to highlight the potential emissions savings and wellbeing benefits that can be realised through consolidation and shifting to collaborative, 'active', last-mile delivery solutions. With Dublin and Cork both now included in the EU's Cities Mission programme to achieve net-zero status by 2030, these urban delivery solutions will be an important part of achieving such targets.

Project SENATOR

Dublin has been chosen as one of two 'Urban Living Lab' cities for the SENATOR Urban Freight logistics project. The EU project will look at enabling shared, integrated and more sustainable urban freight logistics. Senator's target is to integrate input from local authorities, the public, transport operators and logistic operators and shippers into one platform. One of the main objectives is to provide four governance schemes for urban planning policies. These schemes will be based around user demand planning, transport planning, freight and logistics planning and city infrastructure focused planning.

The schemes aim to provide a framework for cities to follow to ensure that urban freight logistics are sustainable in the long run.

Within Dublin, the project partners aim to improve the liveability of the city by dealing with traffic congestion due to commercial vehicles, inefficient use of loading bays and an inefficient urban logistics system. The trial will take place in retail and commercial districts in Dublin city centre where space for deliveries and commercial vehicles is limited and at a premium.

CountEmissions EU

The Commission has launched a consultation on an initiative for a harmonized EU framework for the measurement of transport and logistics emissions, known as CountEmissions EU.

Door-to-door transport and logistics operations are usually very complex due to the large number of actors and various transport modes involved, making it hard to accurately track emissions. However, CountEmissions will use a broad range of instruments which have emerged to help optimise the efficiency of operations and to lower associated emissions.

One such instrument is greenhouse gas (GHG) emissions accounting, which generates, shares and compares emissions data of both unimodal and multimodal transport activities and operations. This can incentivise companies, customers, and passengers to take up more environmentally friendly and efficient transport solutions. This

initiative aims to provide a common framework for calculating GHG emissions of transport operations in the freight and passenger transport sectors.

CountEmissions will contribute to the implementation of the European Green Deal, and to meeting the objectives and targets under the European Climate Law. It corresponds to Action 33 in the Action Plan of the Sustainable and Smart Mobility Strategy, published on 9 December 2020, and will form the basis for the implementation of Action 28 and Action 34 in the same Action Plan. The initiative will be coordinated with other regulatory and non-regulatory EU actions.

Feature Piece – Decarbonisation in Practice

Many freight decarbonisation technologies and innovations are being trialled across Ireland, Europe, and further afield. Examples of some of the technologies introduced and their trials are detailed below.

An Post HVO Trial



An Post began trialling Hydrotreated Vegetable Oil (HVO) as a fuel for heavy goods vehicles in September 2021. The trial commenced on 8 September 2021, with one articulated truck travelling between An Post's Galway Delivery Service Unit and the Dublin Parcel Hub. The trial was then further expanded to the entire Galway HGV fleet (four articulated trucks and one rigid truck) on 15 September 2021. To date, An Post has travelled 400,000km using HVO without encountering any technical issues. The Galway fleet uses approximately 2,300 litres per week and will consume approximately 120,000 litres in a full year.

The use of HVO results in a significant reduction of CO₂, NO_x, and particulate matter emissions. Since introducing HVO, An Post has reduced the CO₂ emissions from the Galway HGV fleet by 90 percent. HVO can be blended with traditional fossil-diesel, or it can be used in its pure form in a conventional diesel engine, without the need for any modifications. As such, HVO has been approved by all major OEMs, including DAF, Scania, Mercedes, Iveco, Volvo Trucks and MAN Trucks. An Post has not experienced any maintenance or vehicle performance issues associated with the use of HVO. Additionally, the An Post HVO trial has revealed that HVO efficiency is on par with diesel.

100 percent. HVO is not currently available at service stations in Ireland. Therefore, An Post retrofitted an existing 45,000 litre tank and diesel pump on its site in Galway, engaging with the Circular Economy by reusing an existing tank instead of buying a new one. Drivers are pleased with the initial performance of HVO, and as the Galway pump dispenses 70 litres of HVO per minute, it is much faster than an ordinary petrol pump and means drivers spend less time refuelling.

However, the cost of HVO remains significantly higher than diesel with price fluctuations occurring during the trial. An anticipated growth in demand for HVO could lead to further cost increases. Infrastructure investment is also required as HVO is not readily available at fuelling stations in Ireland, therefore the purchasing or retrofitting of tanks and pumps is needed.

Bleeper eCargo Bike



In 2021, a 12-month eCargo cycle trial was conducted by Dún Laoghaire Rathdown County Council, in association with Bleeper, a bike rental company. The results of the first six months were then analysed by Enable/CONNECT in Trinity College Dublin which found that, extrapolating the data up to a year, annually 11,000 vehicle kilometres will have been moved from ICE vehicles to cargo bikes. This innovative trial builds on wider cargo cycle trial schemes that have taken place across Europe and the UK and has been expanded to include Dublin City Council and Fingal County Council. These Irish trials have involved 60 companies including cafés, wholesale food stores, a pharmacy and couriers. This highlights the potential of e-cargo cycles to be scaled nationwide as part of the substitution of vehicular travel with active travel modes. On this basis, the eCargo bike could be considered as an alternative for relatively short journeys with multiple small to medium deliveries, particularly during more traffic intensive times.

Hydrogen electric heavy-duty trucks



Launched in 2020 by Hyundai Motor, XCIENT Fuel Cell is the world's first mass-produced hydrogen electric heavy-duty truck. The company deployed 47 units in Switzerland in 2020, which serve 23 different customers, and which have accumulated more than four million kilometres in driving as of July 2022. On 2 August 2022, Hyundai Motor Company announced the export of its XCIENT Fuel Cell heavy-duty trucks to Germany, the biggest commercial vehicle market in Europe. Seven German companies working in logistics, manufacturing and retail will put 27 XCIENT Fuel Cell trucks into fleet service, with the assistance of funding from Germany's Federal Ministry for Digital and Transport (BMDV).

Hydrogen refuelling



In June 2022 NanoSUN and Reynolds Logistics announced a collaboration to bring hydrogen vehicle refuelling to the UK and Irish markets. The agreement will see Reynolds Logistics support NanoSUN in providing its customers with their Pioneer Mobile Hydrogen Refuelling Station (HRS), while NanoSUN will work with Reynolds Logistics to move hydrogen fuel from the hydrogen source to vehicles. NanoSUN's Pioneer HRS combines the features of volume gas storage, gas transportation and end-use vehicle dispensing in a single ISO container, offering local distribution of fuel directly to hydrogen vehicle fleets.

Virginia International Logistics' migration to Biomethane



Virginia International Logistics took delivery of two dedicated gas trucks in spring of 2018 and opened up a gas filling station at Ballycoolin, Dublin.

In 2019, Virginia International Logistics were the first haulier in Ireland to complete a zero carbon HGV delivery to Europe with trucks fuelled both in Ireland and France with biomethane. The total round trip was 1,121 km and was facilitated and certified by Flogas. Virginia International Logistics now operate 25 gas trucks on 100 percent biomethane. This biomethane is sourced and injected into the national grid by Green Generation.

Virginia International Logistics have plans to open a second CNG station in collaboration with Gas Networks Ireland at Virginia Co Cavan within the next few months. The station will be open to the public and be capable of filling a truck in 10 minutes and will have facilities to fill trucks and cars with biomethane.

Demonstration of commercial potential for Battery Electric Trucks



In 2020 Volvo trucks deployed their first pilot VNR electric trucks to several fleet operators in Southern California as part of the Volvo LIGHTS project. The project aimed to collect real-world operating data and customer feedback. In total thirty battery electric heavy-duty vehicles were deployed to eleven fleets to operate in their daily commercial routes to assess how the vehicles performed. Insights gained from the scheme included the importance of identifying suitable routes, ensuring drivers are trained to maximise range and early stakeholder engagement. Full details of the lessons learned is available [here](#).

Electric articulated trucks



In January 2022, Tesco UK started using electric articulated trucks as part of its heavy-duty haulage fleet. It has introduced two new 37-tonne fully electric DAF CF trucks to its fleet, in partnership with Freight Systems Express Wales (FSEW), the logistics and international freight forwarding company. The new trucks will transport food and other products between Wentloog rail terminal outside Cardiff and Tesco's distribution centre in Magor, Wales. To power the new vehicles, which have a range of 100 miles, FSEW has installed charging points at its site in South Wales. The distance from Wentloog to Magor is 30 miles (48 km), with the initiative enabling Tesco and FSEW to explore the use of these lorries throughout the rest of the UK. These first two electric lorries will replace around 65,000 diesel-fuelled road miles with clean green energy, removing 87.4 tonnes of CO₂eq. per year.

eHighways

Germany currently has three eHighways, which in total are just over 10 kilometres in length. The eHighways along the B 462, A1 and A5 roads are currently being trialled as a solution for electrified road freight transport. These eHighways feature catenary overhead power lines, which supply hybrid trucks with electricity. The trucks are fitted with a pantograph, which makes contact with the power lines above, allowing the vehicles to run completely on electricity with energy from the grid. The trucks' electric battery-packs can also be charged during the trip. Once the trucks turn off the eHighway, they can either drive on battery-packs or run a small combustion engine to complete their journey. Data will then be collected from these trials for several studies which will examine the potential benefits of the eHighways concept.



Short-Term Priorities

High ambition for EU CO₂ Truck emissions standards and reducing regulatory barriers

While the ultimate ambition for the sector is for a shift to net-zero, as an interim measure Ireland will also advocate for and support EU regulations that promote more stringent HGV vehicle emission standards. The forthcoming EU negotiations will set out the trajectory and requirements for Original Equipment Manufacturers (OEMs) to produce and sell cleaner trucks and provide an important opportunity to ensure that voluntary statements made by major manufacturers are backed with regulatory safeguards.

Action 04

Advocate for and support EU regulations that promote more stringent HGV vehicle emission standards

D/Transport,

Certification of Eco-driving Schemes

There are a number of existing eco-driving programmes in Ireland, such as the schemes run through FTA Ireland and the SOLAS-funded Smart Driving programme developed by Mayo, Sligo and Leitrim ETB and Waterford and Wexford ETB, in collaboration with the Irish Road Haulage Association (IRHA).

In the first phase of implementation of the haulage Strategy, the Department of Transport will take steps to establish a national certification/accreditation system for these eco-driving programmes. This will set a standard for these courses to meet and validate their approach, which should encourage greater take up among operators. A recently published Department of Transport co-funded study¹⁸ found that eco-driving training should include driver behaviour, attitudes and knowledge of the strategic, tactical and operational

aspects of eco-driving. Although eco-driving is its own reward in terms of fuel efficiency for operators, as well as reduced emissions, the Department will consider the potential and feasibility of specific incentives that might work to encourage operators to adopt and maintain eco-driving practices.

Action 05

Establish a national certification/accreditation system for eco-driving courses. Consider mechanisms/incentives for operators to adopt and maintain eco driving practices, including potential integration into the Driver CPC programme

D/Transport,

Freight Consolidation Centres

In order to generate greater efficiencies and improve standards, while helping to create secure employment and assist the sector in moving to a low carbon future, a study has been commissioned to examine the feasibility of developing freight consolidation centres which will aim to consolidate and rationalise freight transport.

A freight consolidation centre is a central point for logistics operations in the area in which it is located. A centre typically brings together several different logistics service providers to collaborate to improve efficiencies by sharing assets and infrastructure and streamlining goods shipments and deliveries. The existence of freight consolidation centres such as the

An Post distribution centre at Port Laoise and the concentration of private sector freight consolidation centres adjacent to the N2 at Coldwaters and the N7 near Citywest and Naas shows the potential of these facilities.

The Metropolitan Area Transit Strategies and Rail Freight 2040 note the potential offered by freight consolidation centres. In other jurisdictions these centres have been associated with significant reductions of 60-70 percent in heavy goods vehicle deliveries of construction materials. These reductions in HGV movements were achieved through improvements in vehicle load factors and facilitating well organised multi-leg vehicle journeys.

¹⁸ [Climate Change | Environmental Protection Agency \(epa.ie\)](#)

Research also identifies that there are critical success factors necessary to support the efficient functioning of urban consolidation centers, including sufficient demand to drive down the costs per unit of freight handled, and that the benefits and costs of the scheme are shared among actors along the relevant supply chain.

Analysis is required to assess the feasibility of developing Freight Consolidation Centres to consolidate and rationalise freight transport and so a study will be completed examining the feasibility of developing freight consolidation centres and identify next steps. The study will inter alia cover the following:

- Develop a high-level understanding of the potential of Freight Consolidation Centres in Ireland.
- Identify, and where possible, estimate the benefits that Freight Consolidation Centres may present. Potential benefits may include a reduction in goods vehicle traffic, emissions and accidents, and lower transportation costs as a result of improved

transport efficiency. Identify an indicative high-level model for freight consolidation hubs including for intermodal facilities.

- Determine whether state involvement in the planning, funding, development or operation of the Freight Consolidation Centres improves the outcomes of the Centres; and
- Identify additional work needed to develop the findings of the Position Paper further, subject to the paper showing that there are benefits from developing and operating the Freight Consolidation Centres, and from state involvement.

Action 06

Complete study examining the feasibility of Freight consolidation Centres to consolidate and rationalise freight transport & identify next steps

D/Transport, TII

Taxation of Fuel

Energy taxation is governed by the Energy Taxation Directive (ETD) which sets out excise duty rules covering all energy products in the EU used for heating and transport, as well as electricity. The Directive sets out minimum levels of taxation applicable to these energy products for specific fuel uses and provides for reduced levels of taxation for certain fuel uses under qualifying conditions.

Biofuels are differentiated from fossil fuels currently only for the purposes of carbon tax, in most other respects both are treated the same in the tax system. Change is coming onstream under the ETD and the rules governing state aid, which are expected to be more favourable towards differentiated tax treatment of biofuels, and less favourable to existing fossil fuel subsidies such as Ireland's Diesel Rebate Scheme.

The interaction between fuel prices, taxation and a wider shift away from fossil fuels is complex and a matter of tax policy which will be led by the Department of Finance. However, the Department of Transport is committed to exploring the possibility for greater differentiation in the tax treatment of biofuels as another lever to support decarbonising

the transport sector. Therefore, the Department is undertaking a study to examine the role of biofuels tax within the broader taxation context and to consider the interplay of variables such as the requirement to decrease fossil fuel subsidies, the planned increase in EV numbers and increased carbon tax.

The study is also examining the feasibility of a 'green rebate' in the context of revised EU State aid and energy taxation regimes in response to calls for such a rebate from parts of the road haulage sector. The results of the study will inform renewable transport fuels policy development.

Action 07

Conduct a study to examine the role of biofuels tax and inform renewable transport fuels policy development

D/Transport

Operational Improvements & Digitalisation

Innovation and digital technology will be a key influence in the sustainable transition of the transport sector. Improving operational efficiency will be essential to reduce emissions from freight transport.

In the UK for example, a several years trial of Longer Semi-Trailers (LSTs) has recently completed. These LSTs are up to 15.65 metres long, enabling 30 standard pallets to be transported in a trailer as opposed to 26. At the end of 2019, the trial result indicated that on average, the use of LSTs reduced journey numbers by 1 in 12. With more than 54 million vehicle kilometres saved, 48,000 tonnes of CO₂eq. and 241 tonnes of NOx were saved on a per kilometre basis.

While there were concerns about LSTs in particular as regards road safety, the trial evidence was that LSTs were involved in about 53 percent fewer personal injury collisions and casualties than the GB articulated HGV average. It is now proposed to allow for the general circulation of LSTs in the UK, although these trailers will be subject to additional regulation to ensure that they will not be operated on inappropriate roads, that road safety risks, particularly to vulnerable road users, will be effectively mitigated and damage to street furniture avoided.

The request to examine the introduction of longer trailers, while considering the safety impacts, was a common response to the Public Consultation. The Department of Transport, Road Safety Authority and Transport Infrastructure Ireland will review proposed operations and make a recommendation on proceeding with a pilot project, taking into account infrastructure impacts and road safety.

Digitally-driven operational improvements will also contribute to reaching emissions reduction goals. A recent ITF study examined *How Digitally Driven Operational Improvements Can Reduce Global Freight Emissions*¹⁹ across road, rail and maritime freight. For road freight, the study assumed a 10 percent increase in average load utilisation (load factor) of road freight by 2025, growing to 25 percent in 2050 and estimated that this could reduce the CO₂ emissions of road freight by 14 percent and the whole freight sector by 7 percent by 2050, compared to the baseline scenario.

Improving asset-sharing through digitalisation - decreasing information costs, providing real-time data and asset-sharing platforms - results in more efficient use of vehicle capacity and reduces the number of kilometres trucks operate with empty loads. The study suggested that these improvement measures are readily available and easy to implement, with few implementation barriers or regulatory burdens.

In order to assist with the adoption of route optimisation and consolidation technologies and increase their accessibility for small Irish operators, the Department will engage with DETE to examine what funding supports may already be available to the industry and what options could be considered to introduce supports if necessary.

Further improvements include adopting intelligent transport systems (see next section) and reducing intermodal dwell time. Congestion could also be eased through increasing night-time deliveries and incentivising parcel pick up/drop off points in urban areas.

Action 08

Launch a call to the private sector re specific transport operations which may be suitable for a Longer Semi-trailer Trial

D/Transport,
RSA, TII

Action 09

Examine policy options, including funding supports, to reduce carbon emissions through operational and digital efficiencies and assess how they will play a role in Ireland's journey to net zero

D/Transport
and Industry

¹⁹ [How Digitally-driven Operational Improvements Can Reduce Global Freight Emissions | ITF \(itf-oecd.org\)](https://www.itf-oecd.org/transport/operational-improvements)

Case Studies – Digitisation



Freight forwarding is the process of organising how and where items will be shipped around the world. **Sennder**, a Berlin based digital freight forwarder that was founded in 2015, focuses on moving cargo around Europe, specifically focusing on trucks and full truck load freight forwarding. Sennder digitises the processes of organising, logging and optimising cargo that drivers pack onto their pallets with the aim of improving efficiency. The company automates the process of connecting small to medium HGV companies with enterprise shippers in order to combine cargo loads. In January 2021 the company was valued at over \$1bn.

Formerly called Provision, **Cameramatics** was founded in Ireland in 2016. Their vehicle operations cloud platform is used to digitise and automate manual processes. The platform uses camera technology, vision systems, AI, machine learning and telematics to help manage fleet operations.

The insights they provide can be used by hauliers to identify fleet inefficiencies, improve fuel management, and monitor driver performance. It is one of eight Irish companies and start-ups which was selected by Bord na Móna to take part in its Accelerate Green programme for businesses focusing on sustainability and climate action.

COLL-8 is an Irish start-up with aims to improve the e-commerce experience for customers and retailers and resolve the problem of first time deliver failure. Through its drop2shop brand the company aims to provide fast, safe and environmentally friendly deliveries. COLL-8 takes advantage of the BWG convenience store network by consolidating e-commerce parcels from retailers at BWG's Baldonnell hub which are then shipped to a comprehensive network of locations across Ireland without the need for extra vehicles. Customers can return packages at their local convenience store using a QR code which is sent directly to their phones.

Enablers for Medium to Long-Term Progress

European Policy - Fit for 55

The European Commission's proposed revision to the Alternative Fuels Infrastructure Regulation (AFIR) is part of the Fit for 55 legislative package to support the achievement of the EU's goal of carbon neutrality by 2050. As proposed, the AFIR seeks to ensure the availability and usability of a dense, widespread infrastructure network throughout the EU to facilitate a quicker transition to cleaner vehicles. The trilogue²⁰ process to seek final agreement on the AFIR text has begun and it is expected that the Regulation will come into force next year. When finalised, the AFIR will mandate the rollout of alternative fuel infrastructure dedicated to HDV across the EU, with a strong focus on the TEN-T networks.

Deployment of EV recharging and hydrogen refuelling infrastructure for heavy-duty vehicles will be prioritised in the proposed regulation, in addition to an obligation under AFIR for Member States to update National Policy Frameworks on the use of Alternative Fuels in Transport by 2025.

A minimum number of publicly accessible high powered charge points will be required to meet the future charging needs of heavy-duty electric vehicles such as large goods trucks. The Electric Vehicle Charging Infrastructure Strategy 2022-2025 is expected to set out actions regarding the creation of specific plan for delivering widescale infrastructure for charging, with an emphasis in the early years on private cars and infrastructure plans for charging for

²⁰ Trilogues are informal tripartite meetings on legislative proposals between representatives of the EU Parliament, the Council and the Commission. Their purpose is to reach a provisional agreement on a text acceptable to both the Council and the Parliament.

HGVs to follow; reflecting the expectation that HGVs will be slower to electrify than the car fleet.

Collaboration and engagement with the freight sector and other key stakeholders (including ESN and EirGrid) will be key to planning the decarbonisation pathway for this sector, and ZEV will work with officials leading on freight sector policy with regard to the electrification of freight to determine optimal interventions to facilitate and enable the provision of charging infrastructure for this sector. The Draft EV Infrastructure strategy is expected to be published by end 2022.

Engagement through the ZEV industry stakeholder forums and preparatory work that will contribute to the delivery of AFIR HGV infrastructure requirements by 2025, have particular relevance for the future charging needs of heavy-duty electric vehicles.

Also included in the European Union's "Fit for 55" package of measures is a proposal for a third Renewable Energy Directive (RED III), which will recast the second Renewable Energy Directive (RED II), and which is expected to increase ambition for renewable energy in the electricity, heating/cooling, and transport sectors.

If enacted, RED III will increase the target for the renewable energy share in transport (RES-T) and would lead to at least a 13 percent reduction in the greenhouse gas intensity from energy used in transport by 2030. This includes sub-targets for the share of advanced biofuels and biogas and renewable fuels of non-biological origin (RFNBOs) such as green hydrogen. However, the development, availability, and cost of advanced biofuels and RFNBOs as well as the sustainability of feedstocks for biofuels may impact on the delivery of the RES-T target by 2030.

Action 10

Continue to negotiate at EU level in support of an ambitious EU Green Deal and to ensure Ireland's interests are reflected in the EU Fit for 55 legislative package

D/Transport

Action 11

Support ZEV office work on infrastructure, energy and AFIR requirements from the perspective of heavy goods freight, leading to the 2025 EV Infrastructure Strategy Review which will determine optimal interventions to facilitate and enable the provision of charging infrastructure for HGVs

D/Transport

Action 12

Update National Policy Frameworks on the use of Alternative Fuels in Transport

D/Transport

While there has been a signaled intention to remove vehicle grants for smaller electric vehicles in the short term, it is expected that the Heavy Goods Vehicle scheme would remain in place for an extended period towards 2030 as the supply of commercially viable electric HGVs increase.

Action 13

Maintain the Alternatively Fuelled Heavy Duty Vehicle Grant Scheme at least until 2027 and look to increase funding available under the Scheme to support fleet renewal

D/Transport

Forthcoming Hydrogen Strategy

DECC is currently developing an integrated national Hydrogen Strategy, due for publication later in 2022. The current draft of the strategy notes that hydrogen can be used as a fuel by most types of vehicles either by using hydrogen in a fuel cell to power electric motors or by burning hydrogen (or hydrogen-based fuels such as ammonia) in an internal combustion engine. The Climate Action Plan sets out targets for battery electric vehicles as the most commercially advanced solution for decarbonising passenger cars and other lightweight vehicles. Direct electrification (via battery-electric vehicles) has significant efficiency advantages over hydrogen use due to the energy conversion losses in producing and using hydrogen in fuel cell electric vehicles (FCEVs). Therefore, direct electric technologies are preferable where they are technically feasible. However, full electrification may remain a challenge for heavy, long-range vehicles, particularly maritime, aviation and long-haul road freight. While FCEV options for trucks and coaches aren't yet commercially available, it is anticipated that these vehicles will become commercially available in the second half of this decade.

AFIR will require the deployment of gaseous hydrogen refuelling infrastructure along the TEN-T core network, with particular attention to urban nodes and multimodal hubs.

Hydrogen can be used very safely as a fuel with residual risks managed to a level that is as low as reasonably practicable when all necessary standards and safety regulatory frameworks and enabling legislative requirements are in place. However, hydrogen is currently not well developed in Ireland for energy applications and supply is likely to be both limited in the early years and comparatively expensive. Pending the publication of the Hydrogen Strategy, to support potential early movers in hydrogen mobility, the Department of Transport has included hydrogen vehicles in the Alternatively Fuelled Heavy-Duty Vehicle (AFHDV) Purchase Grant, complemented by an accelerated capital allowance (ACA) tax incentive for purchasers of hydrogen vehicles and associated refuelling equipment. From 2023, as set out in the Renewable Fuels for Transport Policy Statement (RFFTPS), fuel suppliers will be able to offset their biofuel obligation with green hydrogen, receiving a four times credit.

The Department has also supported trials of three hydrogen powered double deck buses on suburban public transport routes in Dublin and

in Cork. Additionally, working with counterparts in the Northern Ireland Executive and as part of the Government's Shared Island initiative, the Department has commissioned research on the potential for cross-border cooperation to inform the approach to implement hydrogen refuelling infrastructure in both jurisdictions on the island of Ireland. The first phase of this research is underway and is assessing the options concerning safety regulation for possible future hydrogen refuelling infrastructure, including best practice and guidance on interoperability and delivery. A second phase of research (envisaged to be commenced next year) would involve a feasibility study concerning delivery of transport refuelling on a cross-border basis on the Island of Ireland, including the criteria for optimizing location and use.

One of the main challenges to the supply of green hydrogen is the availability of renewable energy to produce it; current analysis indicates that green hydrogen production can be expected to feature in the Irish energy system by 2030 and to expand significantly post-2030, as significant scale offshore wind and other renewable electricity sources are developed.

It should be noted that while hydrogen burned for power generation does not produce carbon dioxide emissions, it does produce other air emissions such as nitrogen oxide (NOx), which will need to be carefully considered as part of the overall environmental impact.

The National Hydrogen Strategy will consider the potential demand for hydrogen across the transport sector in Ireland and examine how hydrogen could complement electricity as a zero-carbon transport fuel for heavy duty vehicles.

Action 14

Develop a national Hydrogen Strategy, including consideration of how hydrogen can play a role in the decarbonisation of heavy goods road freight

DECC
D/Transport



Vehicle Taxation

Since commercial vehicles differ from private vehicles in that they are not taxed on the basis of their emissions, the Climate Action Plan and Programme for Government have both committed to a review of the emissions basis of Motor Tax and Vehicle Registration Tax. Differentiated vehicle registration and motor tax for lower emitting vehicles and alternatively-fuelled vehicles is one policy lever that could support a shift to alternatively-fuelled heavy goods vehicles, along with direct grant support for vehicle purchase and operating incentives such as differentiated tolling and road charging.

Current Vehicle Taxation HGVs

VRT	€200
Annual Motor Tax	€420-900 based on unladen weight

A 2022 Tax Strategy Group Paper²¹ published by the Department of Finance in September 2022 which assessed emissions-based options for taxation of

commercial vehicles found that there was limited scope for behavioural change due to the lack of low-emission alternatives currently available. Future examinations will consider how to provide an emissions-based incentive while not disproportionately adding to the costs of commercial activity.

The Department of Finance will continue to carry out scoping exercises and to examine options with the aim of establishing a logical, emissions-based taxation regime that will incentivise the greening of heavy vehicle fleets.

Action 15

Continue to examine the scope for behavioural change through an emissions-based taxation for commercial vehicles

D/Finance

Whole of Government Circular Economy Strategy

The majority of the global economy as it currently functions is based on a linear model of production and consumption. This model, in which natural resources are extracted to make things that may only be consumed once before disposal, is not environmentally sustainable. The circular economy offers an alternative which promotes extending the life cycle of resources to extract the maximum value from them, then recover and repurpose products and materials at their end of life.

While this circular approach is already widespread in some industries, there remains significant opportunity within the automotive, freight and logistics sectors. Utilising approaches central to the philosophy of circular economy will be essential is ensuring that the expected growth in the volume of freight transport can be accompanied by the required overall reduction in emission levels to meet climate goals.

In December 2021 the Government adopted the Whole of Government Circular Economy Strategy 2022 -2023. The strategy aims to provide a framework for Ireland's transition to a circular economy and to raise awareness of how the circular economy can improve the lives of households, businesses and

individuals. It also seeks to identify barriers to the transition and provides for the development of sectoral Circular Economy Roadmaps for resource intensive economy sectors. The Transport sector was included in the Strategy's indicative list of sectors.

The Circular Economy and Miscellaneous Provisions Act 2022 was enacted in July 2022 and provides a statutory basis for future iterations of the Circular Economy Strategy. The Act also includes a statutory requirement for the inclusions of sectoral targets and supporting actions in the Strategy. The Department of Environment, Climate and Communication is in the process of developing the necessary evidence base to underpin these sectoral targets in the second iteration of the Strategy, with a view to that document being published, on a statutory basis, towards the end of 2023.

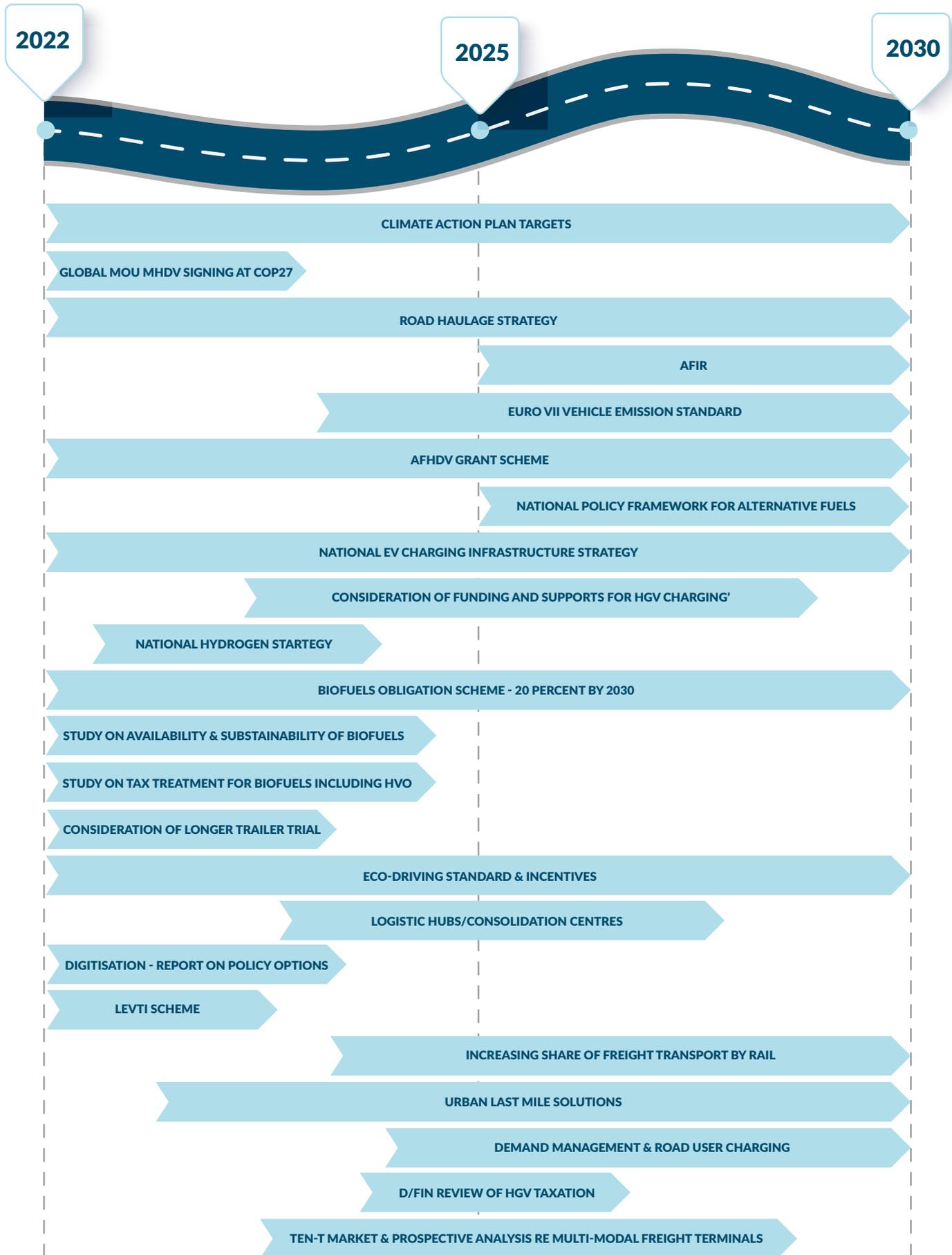
Action 16

Support the Whole of Government Circular Economy Strategy

DECC,
D/Transport

21 [Budget 2023 Tax Strategy Group Papers](#)

Decarbonisation Roadmap





6.3 | Road Infrastructure & Usage Charging

Context and Background

This chapter focuses on road infrastructure and usage charging, covering the following areas:

1. The road network itself as it relates to heavy goods freight;
2. The ancillary infrastructure required for HGVs, including rest stops
3. The possible role for and implications of road usage charging.

The Existing Road Network

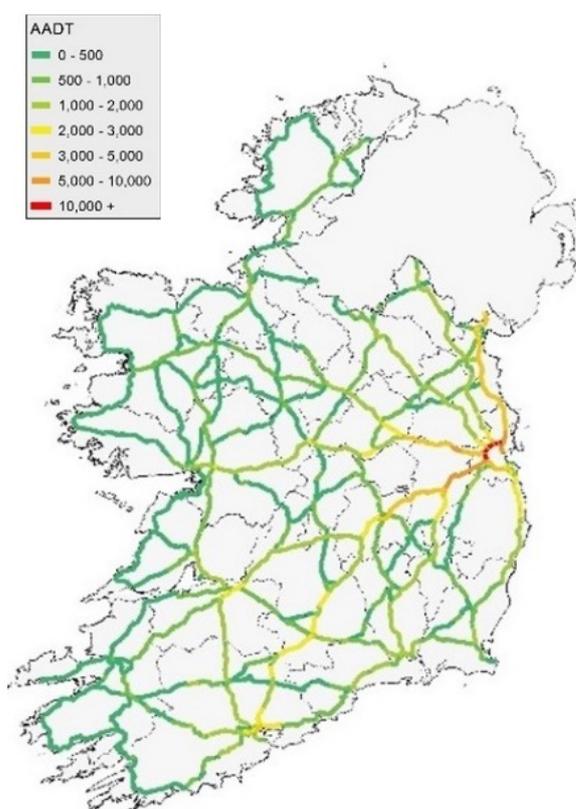
The primary and secondary road network in Ireland is 5,306km long and is made up of motorways, dual carriageways, and single-lane roads. Approximately 320km of the 916km motorway network is operated by Public Private Partnerships (PPPs).

The remainder of the road network is managed by local authorities, who are responsible for urban and remote sections of dual carriageway, national secondary, regional, and local roads.²² There are almost 94,000km of regional and local roads in Ireland (2019 figures).²³

Freight is heavily dependent on the road network, with 99 percent of freight being transported by road. TII estimates that 80-90 percent of freight transported is carried on the national primary and national secondary road network, with the remainder on regional and local roads.²⁴ As discussed in the intermodal section, there may be scope for increasing the share of rail freight in Ireland. Nevertheless, given Ireland's dispersed population and relatively short route distances, it is expected that freight transportation by road will continue to be the most important mode in an Irish context. Freight traffic is particularly concentrated on certain roads, as can be seen in the accompanying maps.

The maps present existing (2021) and projected future (2030) typical HGV daily traffic levels on National Roads. This is based on analysis using the TII National Transport Model. Existing HGV traffic levels in the model are validated to observed traffic levels using over 350 traffic sensors on National Roads.

HGV Traffic 2021



Projected HGV traffic levels in the model are based on an economic analysis of the links between HGV volumes, Value Added in the relevant sectors, and anticipated housing activity.²⁵

²² [TII - Our Road Network](#)

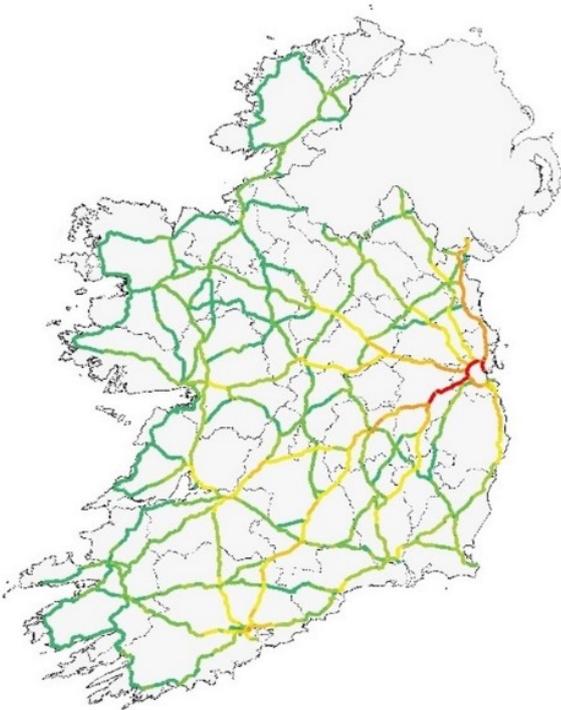
²³ [gov.ie - Regional and Local Roads \(www.gov.ie\)](http://www.gov.ie)

²⁴ [TII National Roads 2040 draft for public consultation](#), p. 20.

²⁵ Further detail on this process is included in Section 6 of the 'TII National Transport Model: Travel Demand Forecasting Report', available at <https://www.tii.ie/tii-library/strategic-planning/national-transport-model/NTPM-Vol3-Travel-Demand-Forecasting-Report.pdf>

The maps show the expected growth in HGV traffic across the country, particularly around Dublin, Cork, and Limerick and strategic links such as the M50 and connections to ports and airports.²⁶

Projected HGV Traffic 2030



Ancillary road infrastructure

In addition to the road network itself, delivering ancillary infrastructure such as rest stops, parking areas and refuelling/charging points is important in supporting an effective road freight sector.

In addition to other initiatives on labour market and skills, as discussed in section 6.7, the provision of safe and secure parking areas (SSPAs) for HGVs was suggested by stakeholders during the public consultation as an important step towards improving the attractiveness of driving as a profession and encouraging new HGV drivers.

SSPAs are also essential for the security of the goods being transported, with cargo theft estimated to lead to losses of €8.2 billion annually

across the EU.²⁷ The scale of these losses can be partially attributed to the current lack of SSPAs across the bloc, with a 2019 study by the European Commission noting that only 2 per cent of the 300,000 parking spaces available for Heavy-Duty Vehicles in the EU were in certified secure areas.

In response to this need, the European Commission established an Expert Group on [Safe & Secure Parking Areas for Trucks](#) to assist in defining the technical specifications of SSPAs and in rolling them out across Europe. In April 2022, new EU standards were adopted that categorise parking areas according to four security levels: bronze, silver, gold, and platinum.

The standard is defined by the security of the

- Perimeter,
- Parking area,
- Entry/exit points,
- Staff procedures.

In addition, in order to meet the standard, all SSPAs (irrespective of level) must have necessary facilities for drivers, such as gender-friendly sanitary facilities, facilities to purchase food and drinks, and internet connection.

To ensure that the network of SSPAs is developed sufficiently, the Commission has proposed that SSPAs should be made available on the Core and Comprehensive TEN-T network, with a maximum distance of 100 km between each area.²⁸ To encourage operators to develop SSPAs, funding has also been made available by the Commission through the Connecting Europe facility.

Another important element of ancillary infrastructure is refuelling/charging infrastructure. This is covered in the decarbonisation chapter, in particular regarding the expected requirements of the EU Alternative Fuels Infrastructure Regulation, ZEV plans for a national EV charging network and the proposed Hydrogen Strategy for Ireland.

²⁶ For more on international connectivity, see NIFTI Background Paper 13, available here: [gov.ie - National Investment Framework for Transport in Ireland \(NIFTI\)](https://www.gov.ie/nifti) (www.gov.ie).

²⁷ [Home \(eu-parking.eu\)](https://eu-parking.eu)

²⁸ https://transport.ec.europa.eu/news/efficient-and-green-mobility-2021-12-14_en

Road Usage Charging

Road usage charging can contribute to two important goals: generating income that supports investment in infrastructure, and managing demand, which can optimise the use of infrastructure and contribute to decarbonisation efforts.

In relation to generating income, at present a small proportion comes from road usage charging sources including tolling. As Exchequer income from excise and other taxes related to internal combustion engines falls, road usage charging may form part of the funding for the continued maintenance of roads.

Road usage charging can also contribute to the decarbonisation of the road network and the efficient operation of the road network through its

capacity to manage demand. Managing network demand is of benefit to all users, since public transport and private vehicles are also affected by an increase in road freight traffic.

Usage charging aligns with the principle of 'the user/polluter pays', contributing to the fight against pollution. An International Transport Forum review of road pricing simulations or schemes found that distance-based charges were generally estimated to reduce CO₂ emissions by between 5 percent and 20 percent. Usage charging can also be calibrated towards specific road users to avoid adverse effects.²⁹ Some of the options for the design of road usage charging, and their implications, are presented in the table below.³⁰

Type	Summary
Single Point Tolls	Provide a demand management option specifically at one critical pinch-point on the network, primarily to influence route choice and more evenly distribute traffic.
Distance-Based Tolls	Road user charging based on usage. Leads to more efficient network use through reduced congestion where implemented.
Cordon Charging	Aimed at improving network efficiency across a large area and is normally implemented in city centres, with positive impacts on travel times and the environment.
Variable Tolls	Users charged based on traffic demand/congestion. Variable tolling is the most effective demand management (as opposed to revenue-raising) tool
Selective Vehicle Tolls	Primarily aimed at heavy goods vehicles as they have a disproportionate impact on pavement deterioration when compared with private car use, selective vehicle tolls target one specific group to reduce demand or raise revenue.
Others	By looking at financial methods other than tolling, for example vehicle quota systems, road authorities are able to have a certain desired impact, such as limiting the number of cars or benefitting more environmentally friendly options.

There is a challenge in designing road usage charging systems as both a demand management tool and a revenue raising tool, as if demand drops in response to the charging, there will be a gap in available funding. Usage charging on certain roads can also divert traffic to other routes, which may undermine their effectiveness (for example, by

diverting freight traffic to non-tolled roads). Finally, there may be a real or perceived inequity in the charging system, depending on which roads may be subjected to usage charging.

²⁹ [Road charging and tolls | ITF \(itf-oecd.org\)](#)

³⁰ [NIFTI Background Paper 11: Interurban Connectivity](#), pp 40-41.

What has already been achieved?

National Development Plan

The National Development Plan (NDP), under the National Strategic Objectives of 'Enhanced Regional Accessibility' and 'Strengthened Rural Economies and Communities', emphasises the importance of the protection and renewal of national, regional, and local roads. Under the revised NDP, published

in 2021, the National Roads programme will continue to provide for improved connectivity. Over the period 2021–25, the gross voted capital allocations for the Department of Transport are between €2.511 bn and €2.665 bn annually.

NIFTI

The National Investment Framework for Transport in Ireland (NIFTI) sets out four investment priorities for future investment in the land transport network:

- Decarbonisation
- Enhanced Regional & Rural Connectivity
- Mobility of People & Goods in Urban Areas
- Protection & Renewal

NIFTI also sets out an Intervention Hierarchy to inform intervention decisions and to ensure that investment is proportionate to the problem identified. It prioritises making best use of existing assets over the construction of new infrastructure, with the following order of priority:

1. Maintain
2. Optimise
3. Improve
4. New

In line with this hierarchy and these investment priorities, maintaining, improving, and optimising the network is essential to an effective road haulage sector. This is particularly important given the impact of freight on road degradation and the predicted increase in the level of freight movement

on roads in the coming years. As highlighted in the maps above, there is particular intensity of use on certain roads, especially those around Dublin and those that link to ports/airports.

Facilitating effective links with air, maritime and rail freight will also be important. This is discussed in greater detail in the intermodal chapter.

Another cohort of roads that may require particular attention and which are not necessarily on the national primary and secondary network are lifeline roads. These are roads with few available alternatives, which means that failure of these roads brings a high social and economic cost. NIFTI states that maintenance of such roads may have to be considered separately to that of the general road network.³¹ TII's strategy, National Roads 2040, also identifies arterial roads – which cater for high travel demand and are in close proximity to large urban centres – as being important to the efficient movement of people and goods.³²

NIFTI therefore outlines the priorities for transport investment, which will support an effective road haulage sector, as well as delivering on wider policy goals.

Road Tolling

Currently road charging in Ireland takes place at road tolls which are generally located on major interurban corridors. A charge is imposed on each vehicle passing through the toll gate. TII is responsible for overseeing the procurement and implementation of new tolling arrangements, and for monitoring and managing existing tolling arrangements on the national roads network.

There are currently twelve pieces of tolled infrastructure in Ireland. The full list can be found [here](#).

As described fully in section 6.2, under the LEVTI Scheme which offers toll discounts for alternatively-fuelled vehicles, eligible vehicles can qualify for up to a 50 percent discount on tolls up to an annual cap of €1,000.

³¹ [National Investment Framework for Transport in Ireland \(NIFTI\)](#), p. 39.

³² [TII National Roads 2040 draft for public consultation](#), p. 37.

Intelligent Transport Systems

Intelligent Transport Systems (ITS) is the integration of information and communication with transport infrastructure, vehicles and users. Through TII a variety of ITS projects have been deployed in Ireland, including automatic number plate recognition and variable message signs on the M50 to keep road users better informed about how incidents may affect their journey. The majority of these have been in the Greater Dublin Area (GDA), but there has been a limited amount deployed elsewhere as well.

In particular, ITS technology is being deployed by TII as part of the enhanced Motorway Operations Services programme to mitigate the adverse effects

of future M50 traffic growth on safety levels, as well as enhancing efficiency and improving journey time reliability by reducing the number of 'stop and starts' that take place along the M50. Real-time information from automatic incident detection loops in the road surface, CCTV cameras, and other communications and roadside equipment is used to determine the appropriate speed at which vehicles should travel. The speed is then communicated to road users through digital signs located above each lane. In the event of an incident on the M50, road works or at times of heavy traffic flow, the speeds displayed on the digital signs are lowered to slow traffic, reducing queuing and the associated risk of collisions as vehicles approach the back of queues.

Short-term Priorities

National Roads 2040

There is a clear need to continue protection and renewal of the road network, to ensure that it remains of a high standard. Prior to any expansion of road usage charging, this will require a commitment to Exchequer funding of these activities. There is a particular need to optimise roads of strategic importance.

TII is currently in the process of developing a new strategy for the national roads network, known as National Roads 2040, which will be finalised in early 2023. National Roads 2040 is TII's long-term strategy for planning, operating, and maintaining the National Roads network and has been developed to support the delivery of the objectives of the National Planning Framework (NPF) and to align with NIFTI. In the

strategy, TII commits to working with the Department of Transport and partner agencies to explore traffic and demand management measures to improve the journey-time reliability required for the efficient movement of imports and exports.

Action 17

<p>Ensure the infrastructure strategy for the national road network, National Roads 2040, takes account of the needs of the haulage and road freight sector</p>	<p>TII</p>
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Better Road User Charging Evaluation (BRUCE) study

The Climate Action Plan commits to exploring the potential of road-user charging measures through the Better Road User Charging Evaluation (BRUCE) study, which is being undertaken by TII. BRUCE is a long term project, to prepare for the future expiry and handing back of existing PPP tolled road assets and to plan for the next generation of road user charging for Ireland post 2030.

Thirteen sections of the national motorway network are currently operated via PPPs. Collectively these sections make up a sizable proportion of the national motorway network. Income collected from tolls on these roads covers the operational costs and associated

infrastructure of the PPP schemes, and the remaining (net) income partly offsets the operational costs and maintenance funding for the larger publicly operated network. In 2022, tolling revenues from the M50, Dublin Tunnel and PPPs contributed approximately 30 percent of the funding for the 'protection and renewal' activities relating to the national road network.

The majority of the funding therefore comes directly from Exchequer sources. The PPPs will expire in the coming decades, which would, in the absence of other measures, mean that Exchequer funding would have to increase to fill this gap.

This, combined with the need to deliver decarbonisation and manage demand, is the impetus behind BRUCE, which will explore the potential options for road usage charging in Ireland. BRUCE is a strategic decision-making process to determine future options for user charging, operation and maintenance of the National Road Network in Ireland.

The Climate Action Plan 2021 included an action to produce a draft implementation plan for BRUCE, to be published in Q2 2023. This implementation plan will present a number of options for road usage charging in Ireland post-2030 and present an initial design and summary implementation schedule for each option including the key challenges and opportunities associated with that option. The implementation plan will be subject to public consultation to create awareness among key stakeholders and to begin to build consensus on a preferred option including pilots for further development. Following consultation, the project will aim to test options and measure their impact, and to ultimately roll out a future road user charging operating model as a component in delivering the transformational change required to meet transport emission reduction targets.

As outlined above, road usage charging is an opportunity to manage demand, contribute to decarbonisation, and generate funding for road maintenance. In relation to haulage, usage charging may be able to incentivise operational efficiency, low-carbon vehicles, mode switching, and congestion reduction. There is a need to develop an effective policy in time for the cessation of the PPPs on

Parking & Rest stops

Parking and rest facilities are essential to provide quality services to HGV drivers and to provide opportunities for rest. Since the publication of TII service area policy in 2014, the private sector has responded and provided facilities close to motorway junctions. Overnight parking is observed at some motorway service areas. TII will be engaging in public consultation for its new motorway service area strategy in 2023 and will be working with the RSA to improve public and haulier awareness of the existing motorway service area locations and facilities.

The Department will also support the development of a comprehensive mapping of ancillary infrastructure as it relates to haulage and the road freight sector, including rest stops and refuelling stations. This project will assess the quality and quantity of such

elements of the road network and the need to give users notice of the change. BRUCE will also enable the development of the necessary infrastructure to implement the road charging system.

BRUCE will also reflect developments on road usage charging at the European level. An amended Eurovignette Directive entered into force in March 2022, which sets rules for user charging on the TEN-T network. It makes progress in the application of the 'polluter pays' and 'user pays' principles by gradually replacing time-based user charges with distance-based charges, which are considered fairer, more efficient, and more effective. Member States will also be required to set different road charging rates for lower carbon vehicles. Furthermore, Member States will be required to transpose the Directive into national law by March 2024, and so it will have to be factored into the BRUCE options.

The Public Consultation for this strategy emphasised the need to ensure that any changes to road user charging which emerge from the study should be clearly flagged to the haulage industry ahead of implementation.

Action 18

Advance Better Road User Charging Evaluation (BRUCE)
- Draft implementation plan by Q2 2023

TII

infrastructure, enabling targeted interventions where appropriate, and be mapped onto the usage of the network. A study will be undertaken into the standards of the current infrastructure – especially on the TEN-T Core and Comprehensive Networks – to inform the future development of rest stops and safe parking infrastructure.

Action 19

Map the current infrastructure available to haulage and freight including rests stops and refuelling stations and identify priority projects for advancement

TII,
D/Transport

Enablers for Long-Term Progress

TEN-T

At the EU level, the Trans-European Transport Network (TEN-T) policy addresses the implementation and development of a Europe-wide transport network across all modes, to improve infrastructure usage, reduce environmental impact, improve energy efficiency, and increase safety. It comprises a Core Network, which is to be completed by 2030, and a wider Comprehensive Network, to be completed by 2050.

The implementation of TEN-T is financially supported through the Connecting Europe Facility (CEF). Projects which were recently awarded CEF funding include the N11 Oilgate to Rosslare project, as well as an upgrade to the N13 in Donegal. The table below gives the nodes of the TEN-T network in Ireland.



Interactive maps of the network are also available at <https://ec.europa.eu/transport/infrastructure/tentec/tentec-portal/map/maps.html>.

Nodes of the TEN-T Network in Ireland

Urban Nodes	Airports (Core network)	Airports (Comprehensive network)	Ports (Core network)	Ports (Comprehensive network)
Cork Dublin [Galway ³³]	Cork Dublin	Donegal Inis Mór Kerry Knock Shannon Waterford	Cork Dublin Port Shannon-Foynes	Rosslare Europort Waterford

A revised TEN-T Regulation³⁴ has been proposed by the European Commission and it is expected that this revision will be finalised and agreed in 2023 following trilogue negotiations between the Commission, European Parliament and European Council. This new proposal revises the network map, proposes updated standards for infrastructure on the network, and sets out deadlines by which infrastructure must be brought to the required standard.

Action 20

Fulfil the requirements of the future TEN-T Regulation including in relation to upgraded road infrastructure, safe and secure parking and recharging and refuelling infrastructure

D/Transport, TII

Better Road User Charging Evaluation (BRUCE) study – Further Phases

The implementation plan for BRUCE required under the Climate Action Plan 2021 will lay out the necessary steps for the first phase of the BRUCE project. A further phase, from the end of 2023, will include design of a preferred option, development of a business case, procurement of technology solutions, mobilisation and commencement, with further consultation as needed in each phase, in order to deliver a new system of road usage charging in Ireland in line with future demand management and user charging policy requirements

and expiry of existing contractual arrangements.

Action 21

Advance further phases of the Better Road User Charging Evaluation (BRUCE) project from end 2023 to post 2030

D/Transport, TII

33 In the EU Commission's 2021 proposal to revise the TEN-T Regulation, it has proposed that Galway is added as an urban node on the TEN-T network.

34 EU Commission 2021 proposal to revise the TEN-T Regulation: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM%3A2021%3A812%3AFIN>



6.4 | Integrated Transport Planning & Intermodal Transport

Context and Background

In addition to enabling the efficient movement of freight, this Strategy will support broader policy goals such as the need for balanced regional development. The NPF sets out the Government's long-term vision for adapting to the growth of Ireland's population and changing settlement patterns over the period to 2040. The NPF sets out key objectives including achieving compact growth in cities, promoting enhanced accessibility, and supporting sustainable mobility.

As set out in Section 6.2, a key priority for the Strategy will also be to ensure that national decarbonisation commitments are met. While this will be enabled in part through changes in vehicle technology and refuelling infrastructure, transport planning also has a key role to play in promoting intermodal transport. Intermodal transport refers to the movement of goods by successive modes of transport without handling of the goods themselves when changing modes. There is a strong incentive for countries to promote intermodal transport and encourage shift away from road-based modes, as the overall negative impacts of road transport such as air pollution, climate change, noise, and congestion, are on average, at least twice those of rail or inland waterway transport (per tonne-kilometre).

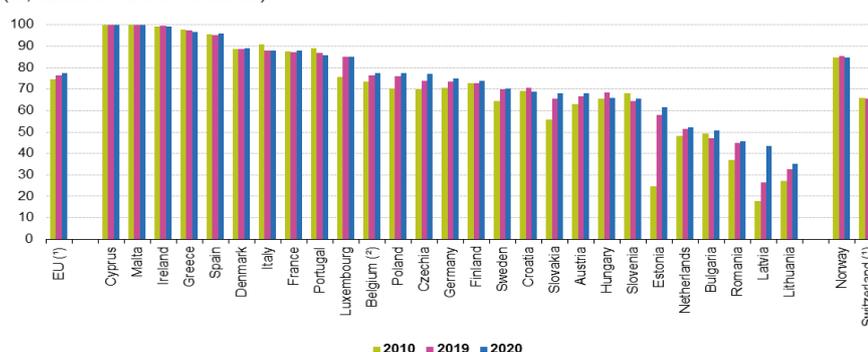
It is notable from the Figure below, which shows the share of road freight in all EU member states, that Ireland is particularly dependent on the road network, which accounts for 99 percent of freight movements, while the remaining 1 percent is made up of rail freight journeys. Cyprus and Malta, the only countries with a

higher share than Ireland, do not have rail networks.

Countries face different barriers when promoting intermodal transport and encouraging modal shift. These barriers are commonly due to their pre-existing infrastructure network and geography. For example, countries without navigable rivers cannot realistically aspire to develop inland waterway transport. Ireland lacks the necessary inland waterway network to generate significant modal shift and the distances between Ireland's ports are not sufficient to make coastal shipping a viable alternative to road freight. This means that the focus of promoting intermodal transport in Ireland rests on increasing the amount of goods transported using rail freight. This is also challenging however as rail freight often entails potentially higher costs and longer transit times compared to road-based freight, particularly as Ireland does not have a rail connection to continental Europe to enable longer, more cost-effective rail-based journeys. Rail freight may struggle for viability at shorter distances, with 300km being frequently cited as the distance at which rail freight becomes competitive with road transport.³⁵

This section will consider transport network planning at the national, regional, and local levels. It will also provide a review of the existing policy developments in relation to the national road and rail networks and connections to international gateways. Finally, it will present short-term priorities and actions that will support modal shift and intermodal transport in Ireland.

Share of road in total inland freight transport, 2010, 2019 and 2020
(%, based on tonne-kilometres)



Note: Countries are ranked based on 2020 data.

(*) Eurostat estimates.

(*) 2019-2020: Eurostat estimates. 2018: break in time series.

Source: Eurostat (online data code: tran_hv_fmmod)

What has already been achieved?

Transport Network Planning

In addition to the investment priorities discussed above, NIFTI also introduces Modal and Intervention Hierarchies, to assist those proposing investments in considering the most sustainable and proportionate solution. Under the Modal Hierarchy model, sustainable mobility solutions should be considered prior to those based on private mobility. For haulage and road freight this could involve considering interventions which make use of rail freight or last-mile delivery services, such as cargo bikes, before considering traditional roads-based transport options. The Intervention Hierarchy requires those proposing investments to consider solutions based on the maintenance or upgrade of existing transport assets prior to the development of new infrastructure. For HGVs, this could entail the development of a new management strategy for an urban area prior to the consideration of new road infrastructure. NIFTI will be implemented through the ongoing update of the Department's Common Appraisal Framework, which should be completed in early 2023. In the interim, guidance on implementing NIFTI has been published on the Department's website. Additionally, NIFTI is supplemented by a series of regional and local planning documents.

Integrated transport planning is supported at the regional level through the development of Regional Spatial and Economic Strategies (RSEs). RSEs have been prepared by the Northern and Western, Eastern and Southern Regional Assemblies, and they provide a high-level development framework for each region which aligns with the objectives of the NPF. This includes a consideration of the transport sector and movement of goods within the region over the coming decades. While the precise policy objectives vary by region, a number of themes are common across the three RSEs, including the need to strengthen regional and rural connectivity through investment in key transport links, with an emphasis on ensuring landside access to ports and airports is maintained and that investment is made in critical road and rail infrastructure to facilitate the movement of people and goods.

Integrated transport planning is also supported by a series of Metropolitan Area Transport Strategies (MATS), which have been developed for the five cities in Ireland and their surrounding

metropolitan areas. The statutory basis for the MATS currently differs between cities, with an explicit statutory basis for the transport strategy for the GDA and a specific statutory role for the NTA in its development. Outside of the GDA, the NTA develops the MATS on a non-statutory basis in cooperation with the relevant local authorities and other agencies. However, the NPF contains a commitment to expand this statutory basis to all five cities.

The Transport Strategy for the GDA and the Galway Transport Strategy were both published in 2016. The GDA Strategy is subject to its six-year statutory required review and at the time of writing a review of the Galway Strategy is due to commence shortly. The Cork Metropolitan Area Transport Strategy was published in 2020, a strategy for the Limerick Shannon Metropolitan Area was published in 2022 and the Waterford Metropolitan Area Strategy will be finalised shortly. While the MATS include consideration of freight issues and the movement of goods relevant to a specific metropolitan area, there are a number of common themes and potential actions which emerge across MATS. These are:

- Potential introduction/expansion of HGV management plans;
- Potential introduction of Urban Consolidation Centres, with particular focus on the potential of Construction and Logistics Centres, and
- Support for the use of rail freight where possible.

The MATS and RSEs are also underpinned by a series of Local Transport Plans, which consider the specific transport issues facing key local settlements and urban centres identified within the RSEs. These Local Transport Plans are prepared in line with Area Based Transport Assessment (ABTA) guidelines prepared by TII and the NTA, one of the primary aims of which is to plan for the efficient movement of people, goods, and services within, to, and from the plan area.³⁶ Guidelines also state that the outcome of the ABTA should include a proposed future transport network organised by mode, with specific consideration given to routes for goods traffic, including HGVs.

As noted above, a number of Metropolitan Area Transport Strategies and TII's National Roads 2040

³⁶ [TII Area Based Transport Assessment \(ABTA\) Guidance Notes](#), p. 9

strategy note the potential role of current HGV Management plans and their potential expansion to support the efficient handling of freight on the national roads network. Modelling for the Five Cities Demand Management Study has shown that the current HGV Management Strategy introduced by Dublin City Council in 2007 has resulted in a 91 percent reduction of HGV movements in designated areas, leading to improvements in congestion and a reduction in local air pollutants.³⁷ However, the Study also noted that the longer driving distances

required by this Management Strategy resulted in a 21 percent increase in CO₂ emissions in the Dublin area. This demonstrates that, in order to avoid negative outcomes, there needs to be an integrated approach to transport planning. For example, the deployment of HGV management strategies may support the reduction of traffic congestion, but will have to be complemented by the deployment of zero- and low-carbon vehicles and refueling technology in order to achieve decarbonisation goals.

Rail Network

The current rail freight network is focused on a small number of customers moving specific goods such as zinc and lead from Tara Mines and pulpwood from Westport to Waterford. However, the potential of rail freight has recently been demonstrated by the opening of a new container train service between Ballina and Waterford Port. The service was opened in July 2021 and operates twice weekly. The logistics operator (XPO Logistics) and Waterford Port estimate that this service has the potential to take 5,000 truck movements off the roads every year, resulting in lower congestion and emissions savings.³⁸ The main ports in Dublin, Cork, Shannon Foynes, Waterford and Rosslare all have existing rail line connections close to or onto the quays. The decarbonisation of the haulage system can benefit from the revival of rail freight and the road haulage system will have to be integrated and make best use of those rail assets.

Irish Rail has developed a strategy to plan for the long-term future of rail freight in Ireland, known as Rail Freight 2040. Rail Freight 2040 notes the importance of developing intermodal transport infrastructure to support modal shift to rail freight and it suggests the development of a network of strategic rail interchange facilities, which would serve as multi-purpose freight interchange and distribution centres linking the rail and road networks. The strategy also proposes that these would be supplemented by smaller tactical rail freight terminals in regional locations and the potential development of an intermodal construction terminal for Dublin.

In support of this vision, in June 2022 Irish Rail was awarded €2.5m in European funding under CEF. This funding will assist Irish Rail in conducting studies for the development of a rail freight network connected to the busiest seaports and establishing

the intermodal transfer locations between rail and road.

Rail Freight 2040 has also been used as an input into the ongoing All-Island Strategic Rail Review. This joint project by the Governments of Ireland and Northern Ireland will examine how the railways are currently used, how they could be used in future and how the network can evolve to serve the people on the island of Ireland and achieve policy goals, including a consideration of the expansion of rail freight opportunities. Given the relatively short distances that internal freight travels in Ireland, which has historically been a barrier to rail freight, the Review is considering the potential levels of rail freight that might be achievable if the cost of moving goods by rail is reduced via subsidies or track access charge reductions. The potential for rail freight afforded by post-Brexit trade flows is also a consideration for the Review, with increased direct sailings to continental Europe from southern ports potentially increasing the distance travelled within Ireland from ports to origin/destination and making rail freight more competitive than has historically been the case.

Rail Freight 2040 further notes the potential deployment of intermodal infrastructure as a key enabler for the expansion of rail freight. The Strategy suggests initially developing terminal infrastructure at key locations at Limerick Junction and West Dublin, which are located close to existing motorways and distribution facilities. The objective of Rail Freight 2040 is to convert some large trucking movements to rail, as well as the provision of rail connections at each of Ireland's Tier 1 ports. By 2040 it is aimed to have increased the number of daily intermodal services from two to ten, based on a modal shift towards rail along key freight corridors and projected market growth.

³⁷ [Five Cities Demand Management Study \(2021\)](#)

³⁸ [RTÉ News, New freight rail service between Waterford and Ballina](#)

As noted above, these proposals will be considered as part of the All-Island Strategic Rail Review.

This strategy will be updated when the All-Island Strategic Rail Review is completed.

Ports Policy & Digitalisation in support of Intermodality

The National Ports Policy 2013 provides the overarching policy framework for the governance and future development of Ireland's state port network. The need to facilitate access to the national road network is emphasised within the Ports Policy and in the master plans of the Tier 1 ports – Dublin, Cork and Shannon Foynes – and the Tier 2 ports of Waterford and Rosslare. National Roads 2040 notes two road projects, currently at the planning stage, that will help support access to the Tier 1 ports at Ringaskiddy and Foynes. The construction of these links is part of the TEN-T road network in Ireland and is to be completed by 2030, in line with EU TEN-T regulations. The Rosslare Europort Access Road, which was submitted for planning in July 2022, will also be a key project in ensuring continued access to Rosslare port.

While there is direct rail access currently at Dublin Port, Waterford Port and Rosslare Europort, rail freight is presently only handled at Dublin Port and the Port of Waterford.

The proposal for a revised TEN-T regulation currently contains a requirement for all Tier 1 ports to be connected to the rail network. This requirement remains subject to agreement by EU Member States. A number of ports are progressing plans to connect to the rail network. In particular, Irish Rail has begun work on the rehabilitation of the disused freight line between Limerick and Shannon Foynes. The rehabilitation works include the installation of new rail and concrete sleepers

along the entire 42km route and renewal of road infrastructure at public road level crossings. These rehabilitation works are expected to be complete by the end of 2024 and, subject to funding and appropriate Public Spending Code approval, further investment could see the line reopen to freight traffic by the middle of the decade. The Port of Cork and Irish Rail are also examining the feasibility of rail services to the port facilities at Marino Point.

Intermodality also requires smooth interconnection between modes. This can help to avoid excessive waiting times, congestion and missed connections. Digital interventions such as Port Community Systems can help in this regard.³⁹ Examples of these digital systems include the Port Terminal Management System currently being developed at Rosslare Port. When implemented, this system will include facilities such as: improved freight and passenger check-in through Smart Gate technology, Real-time cloud-based reporting, and an improved traffic management system. The implementation programme commenced in June 2022 and full system roll-out is expected to be completed over the next 36 months.

Another example is the new container terminal in Ringaskiddy, which became operational in April 2021. It operates a new state-of-the-art booking system, allowing hauliers to book a time-slot for delivery and collection to make container movement in and out of the terminal as efficient and speedy as possible.

Aviation Policy & Access to Airports for Air Freight

The National Aviation Policy 2015 notes that while air freight accounts for a small percentage of the total freight by tonnage transported into Ireland (approximately 1 percent), it accounts for 35 percent⁴⁰ of the value of all Irish freight.

Therefore, it will be important that future planning on the movement of goods ensures access is maintained to national airports, particularly Dublin

Airport where the vast majority of air freight is handled.

³⁹ [ITF Mode Choice in Freight Transport Research Report 2022](#)

⁴⁰ [All-Island Airfreight Report](#), p. 14

Short-term Priorities

All-Island Strategic Rail Review

As described above, there is potential for the further development of rail as an alternative to road freight, which would assist with decarbonisation in particular as well as broader policy objectives. Irish Rail's 'Rail Freight 2040 Strategy' was developed as a means of bringing about a sustainable rail freight system in Ireland. It includes 25 initiatives with an estimated spend of €500m over a twenty-year period. The investments, as envisaged by Irish Rail, would be targeted to transform rail freight infrastructure and enable Iarnród Éireann to provide support for businesses and improved supply chains. The aim of the strategy is to see a material increase in the share of freight carried by rail. In April 2021 the All-Island Strategic Rail Review was launched.

Among other things, an explicit goal of the Review is to identify opportunities for Ireland's ports and airports to be linked to the rail network, while the future use of the network by freight is another key consideration.

Action 22

Complete All-Island Strategic Rail Review and consider future strategic use of rail network for freight

D/Transport

Urban and Regional Strategies for Freight Distribution

The preparation of strategies for sustainable freight distribution for all of the larger urban centres in Ireland – for the Greater Dublin Area and the metropolitan areas of the four regional cities – would provide a solid basis to achieve more effective management of goods movement. Stakeholder involvement would be important in the preparation of such strategies – NTA, TII, Local Authorities, Irish Rail, port and airport operators, the haulage sector and key freight generating sectors of the economy should be represented.

The Draft Greater Dublin Area Transport Strategy 2022-2042, includes a Measure FREIGHT 1 which will support the decarbonisation of the freight sector, seek to further integrate smart technologies in logistics management and reinforce the role that the strategic road and rail network have in the efficient movement of freight. Key in this are two elements– the Strategic Traffic Management Plan, as required under Section 64 of the Dublin Transport Authority (DTA) Act 2008 and the Demand Management Scheme as provided for under Section 71 of the DTA Act.

Consistent with GDA Strategy Measure FREIGHT 1, a consultant team appointed by the NTA has developed a framework for the future development of a Sustainable Freight Distribution Strategy, in consultation with key stakeholders. This work has now been completed and is intended to inform how the GDA Strategy's freight-related objectives

are progressed. The NTA will also consider the applicability of this framework to the regional cities' metropolitan areas as part of the implementation of their respective transport strategies.

Action 23

NTA to lead, in consultation with key stakeholders, the development of Strategies for Sustainable Freight Distribution for the Greater Dublin Area and the Metropolitan Areas Cork, Galway, Limerick and Waterford

NTA, TII,
Local
Authorities

In addition to the five largest urban centres, consideration of goods movement at regional level via Regional Freight Strategies would add value.

Action 24

Regional Assemblies, with the NTA, to lead the development of Regional-Level Freight Strategies in consultation with key stakeholders, consistent with the objectives of the RSESs

Regional
Assemblies,
NTA

These should be consistent with the objectives of the RSEs, with a particular focus on inter-settlement freight movement and on the preparation of freight distribution plans for key towns and other large urban centres. The RSE Monitoring Process and

Local Transport Plans, currently being prepared for key towns and other large settlements by local authorities, in conjunction with their preparation of statutory Local Area Plans, would be relevant in this context.

Enablers for Long-term Progress

Transport Appraisal and Strategy Documents

In order to support alignment of the Haulage Strategy with the NIFTI investment priorities and the objectives of the NPF, it is necessary to further integrate the approach to transport planning. This involves utilising existing transport planning systems and guidelines and ensuring that the movement of freight into the country, and its transport onwards to its final destination, is considered when developing road, rail, port, and airport infrastructure. These factors should also be considered when developing key policy documents like National Roads 2040.

To assist ports with the environmental, technological, demographic, and geopolitical challenges of the next decade, a review of National Ports Policy will commence in early 2023. The first stage in this review will be the drafting of an Issues Paper and it is anticipated that this will go to public consultation in early 2023. Similarly, while acknowledging that many of the objectives of the original National Aviation Policy remain valid, much

has changed since 2015 in terms of the overall challenges for the aviation sector in Ireland, with a focus on continued recovery from the pandemic, a need to meet decarbonisation goals and balanced regional development. For these reasons, the Department of Transport will be examining options for taking forward a review of the National Aviation Policy in 2023.

Action 25

Ensure that the road freight sector and its importance for Ireland is considered as part of all transport strategy documents and policies, including the new National Ports Policy and the review of the National Aviation Policy

D/Transport

TEN-T Regulation – Multimodal Freight Terminals

The EU TEN-T Regulation described in the previous section on road infrastructure, currently includes a requirement on EU Member States to carry out a market and prospective analysis on multimodal freight terminals and to ensure the development of at least one multimodal freight terminal in the vicinity of each urban node.

Action 26

Subject to final agreement at EU level, carry out a market and prospective analysis on multimodal freight terminals and to ensure the development of at least one multimodal freight terminal in the vicinity of each urban node

D/Transport

5

6.5 | Road Safety & Enforcement

Context and Background

Road Safety Strategy

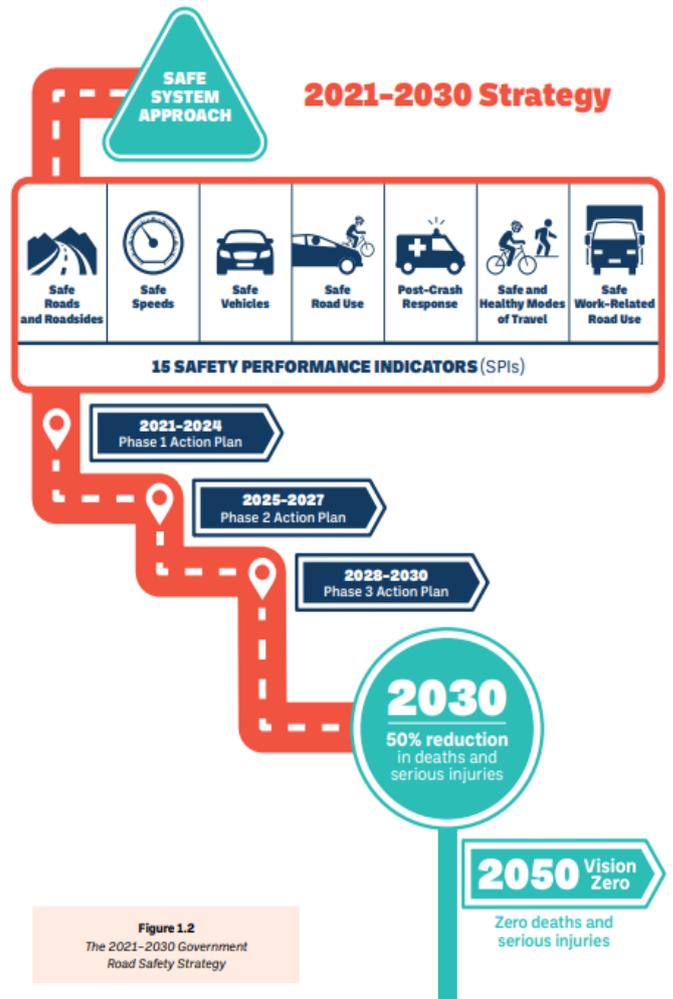
In 2021, the Government introduced Ireland's fifth Road Safety Strategy (RSS) to cover the period 2021-2030. The aim of the RSS is to make roads safer and to reduce deaths and serious injury on Irish roads by 50 per cent over the next 10 years. This is the first step in Ireland towards pursuing "Vision Zero", which seeks no road deaths or serious injuries by 2050. "Vision Zero" is a commitment in Ireland's Programme for Government 2020 and it is also embedded in the EU's Road Safety Policy Framework 2021-2030. The importance of aligning this Strategy with the RSS was a clear request from the Public Consultation.

The RSS will be delivered in three phases, with Phase 1 covering 2021-2024. It is supported by a projected funding of €3.8 billion and it is accompanied by a dedicated Action Plan, with 50 high-impact actions (and 136 supporting actions) that it is hoped will lead to a significant reduction in deaths and serious injuries on Irish roads. Phases 2 and 3 will be delivered over 2025-2027 and 2028-2030 respectively.

The RSS is underpinned by a Safe Systems Approach, which requires shared responsibility between stakeholders and partners in guiding the implementation and achievement of the Strategy's actions over the next 10 years. The seven Safe System priorities that have been identified are:

- Safe Roads & Roadsides
- Safe Speeds
- Safe Vehicles
- Safe Road Use
- Post-crash Response
- Safe and Healthy Modes of Travel
- Safe Work-Related Road Use

Each of the seven safe system priority areas (SSPAs) is important for road freight transport but the SSPA addressing safe work-related road use is of particular relevance.



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. It includes journeys made using publicly or privately owned or leased motor vehicles (including motorcycles), as well as cycling or walking. It aims to ensure those driving for work have the training and resources to do so safely. It also involves the improvement of commercial vehicle enforcement measures and ensuring that employer road safety policies and vehicle safety standards are a key focus, including in procurement competitions.

A number of high impact actions and support actions have been identified as key to improving safe work-related road use. Several of the key suggestions made during the first public consultation on the haulage Strategy align with the high impact actions

and support actions of the Road Safety Strategy. The status of these actions, underway or in planning, is set out in the sections that follow.

Vulnerable Road Users

Road safety measures should consider the danger to vulnerable road users from HGVs. An increase in active travel can be of significant benefit to professional drivers. Each pedestrian and cyclist reduces the number of cars using road space and reduces the requirement for on street parking.

However, measures are needed to reduce risk to vulnerable users and among those introduced in other jurisdictions include the 'Direct Vision Standard' in London City. 'Direct Vision Standard' is a rating system that measures a driver's ability to see from the cab of an HGV. The level of visibility

is rated from zero to five stars. Zero represents the lowest level of visibility and five stars the highest.

The standard requires operators of vehicles over 12 tonnes to obtain a safety permit demonstrating that they meet the minimum requirements before operating in most of Greater London. Any vehicle which does not meet the standard is required to make their vehicle safer by fitting it with Safe System improvements before they can obtain a safety permit.

Feature Piece – Industry Road Safety Standards

FTA Ireland TruckSafe™

FTAI has developed and implemented an industry standard which audits operational compliance in the areas of road safety, haulage operations, roadworthiness, working time and environmental efficiencies.'

TruckSafe™ is available at 3 levels 'Bronze', 'Silver' and 'Gold'. The Bronze accreditation recognises that the operator has satisfied the FTAI auditor that they have systems in place to meet the standards in fatigue, roadworthiness, driver competence, road traffic rules, safe and legal loads, dangerous goods, road haulage operator licensing, professional competence, sustainable operations, contractor and agency management.

Silver and Gold levels require meeting the standards of the Bronze level but also assess how commercial fleet operators are managing their fuel purchasing and consumption.

This standard is achieved through an annual audit and is used to demonstrate commitment to compliance and safety standards.



What has already been achieved?

Campaign of Educational Measures for Professional Drivers

On an ongoing basis, the RSA provides information to professional drivers on safe driving for work, in particular via the dedicated website drivingforwork.ie. This website provides information resources for both employers and professional drivers across a range of matters, including driver and vehicle management. In addition, specific education measures are also implemented annually such as

awareness campaigns in respect of blind spots on HGVs and buses and of regarding vulnerable road users such as pedestrians and cyclists. The importance and promotion of good mental health and well-being for drivers was highlighted in many responses to the Public Consultation on this Strategy.

Commercial Vehicle Operator Advisory Panel

Action 181 of the RSS provides that the RSA should establish a commercial vehicle operator advisory panel to review and make recommendations on enforcement and compliance issues. The first meeting of the panel took place in September 2022, where terms of reference were discussed and agreed.

Members of the Panel include the RSA, An Garda Síochána and the Department of Transport, as well as industry representatives from the IRHA, FTAI and the Coach Tourism & Transport Council of Ireland.

From time to time, other support stakeholders, such as the NTA, the Health and Safety Authority (HSA) and the Chartered Institute of Logistics and Transport (CILT) are invited to attend for relevant topic discussions.

Future panel meetings will consider topics including commercial vehicle roadworthiness, driver CPC, European rules on driving and resting times for commercial vehicle drivers, tachograph use, operator licensing including cabotage, posted driver rules, working time for mobile transport workers and operator risk ratings.

Effective Enforcement by the Road Safety Authority – Additional RSA Resources

The RSA and An Garda Síochána (AGS) enforce compliance with EU and national road transport legislation. A large proportion of road transport legislation now flows from EU level. The RSA, in conjunction with AGS (and Customs where relevant), conduct a comprehensive programme of inspections at both the roadside and business premises on an annual basis. Compliance checks examine issues related to vehicle roadworthiness standards, drivers' hours and rest times, CPC requirements and tachograph infringements.

In 2021, the RSA carried out:

- 17,769 vehicle inspections at the roadside for roadworthiness and 4,265 vehicle maintenance related premises inspections;
- 3,207 drivers hours/licensing inspections at the roadside and 176 premises inspections.

Resulting from these roadside and premises checks, a number of prosecutions were initiated. These included:

- 432 prosecutions on foot of roadside checks;
- 79 prosecutions on foot of premises checks.

The RSA's current enforcement team consists of 20 Transport Officers and 18 Vehicle Inspectors working nationwide to conduct roadside and premises inspections.

In recent years, Brexit has added a new dimension to the RSA's enforcement responsibilities and workload, with the EU-UK Trade and Cooperation Agreement (TCA), rather than EU law, now the legal and regulatory framework governing road transport matters between the EU and the UK. This additional

regime requires appropriate training for RSA enforcement officers on the applicable provisions of the TCA, including on updated documentation requirements.

In addition, Brexit has resulted in an increase in Northern Ireland-based haulage operators using Irish ports to travel directly to Continental Europe, primarily via Dublin and Rosslare. This, in turn, has resulted in additional workload for the RSA in terms of an increased requirement to carry out checks.

In June 2022, in recognition of the increasing workload flowing from the enforcement of the EU Mobility Package and Brexit (via the TCA), the Department of Public Expenditure and Reform approved the recruitment by the RSA of an additional 36 enforcement (and support) staff as follows:

- 20 Transport Officers,
- 2 Senior Transport Officers,
- 10 Vehicle Inspectors,
- 1 Senior Vehicle Inspector,
- 3 administrative support staff.

This increased enforcement complement will help to ensure an ongoing and appropriate level of enforcement activity by the RSA, in compliance with Action 154 of the RSS.

Short-term Priorities

Work-Related Road Safety

Work-related road safety involves the proper, effective planning and management of work journeys. Action 178 of the RSS requires the HSA, in conjunction with other interested stakeholders, to develop a common definition for the terms “safe work-related road use” and “work-related road collision/incident” to assist in the identification and quantification of the type, level, and context of occupational road user involvement in incidents on the road.

The work to develop these definitions is currently underway, and when completed the HSA and RSA will be able to begin work on implementing Action 179 of the RSS, which provides that, by the end of 2023, the HSA and the RSA will draft and formulate a National Safe Work-Related Road Safety (WRRS) Code of Practice. The development of this dedicated Code of Practice will provide employers, organisations and employees with useful and practical information on ways to reduce the risk of death or serious injury on Irish roads.

Action 182 of the RSS sets out that the RSA will work on an ongoing basis with the HSA and AGS to promote the use of road traffic safety management systems and standards (for example ISO 39001) to assist employers in the integration of work-related road safety as a core business objective. To this end, the RSA had its first meeting with the National Standards Authority of Ireland in August 2022, which was aimed at advancing the working partnership between the organisations and exploring options on how best to promote use of the ISO standard among employers.

Action 27

Draft and formulate a National Safe Work-Related Road Safety Code of Practice

RSA, HSA

Reform of the Driver Certificate of Professional Competence (CPC)

Driver CPC is mandatory and a legal requirement for all professional truck drivers. The process of obtaining a CPC involves preparing for, and taking, a series of four tests (theory, case study, practical driving, vehicle walkaround) in order to obtain a CPC card. This card, together with the appropriate driver licence, is required before a person can work as a professional truck driver. Ireland has a robust CPC process in place, which is administered by the RSA. It is an essential tool in helping to ensure that those who seek to enter the truck driving profession have a sufficiently high level of understanding of road safety matters.

Submissions made as part of the public consultation on this Strategy have suggested however that the curriculum for the Driver CPC is out of date, sometimes not relevant for experienced drivers in particular and that the traditional method of classroom delivery is now outdated in the post covid world of hybrid working. A number of submissions suggested that some continuous professional development (CPD) courses should be considered for recognition as part of the CPC.

To ensure that Driver CPC remains effective and fit for purpose, it should be regularly reviewed and revised so

that it covers the most recent road safety regulations and exposes drivers to up-to-date technologies and safety practices. For example, concepts such as eco-driving (which helps to reduce emissions and fuel costs, as well as improve road safety) could eventually be embedded within the Driver CPC curriculum in the future.

Action 183 of the RSS provides that the RSA will, by Q2 2023, improve the accessibility of driver CPC training through the option of e-learning to provide for a blended learning approach for certain parts of the current Driver CPC Curriculum. The RSA is currently in the process of considering how to approach this action and what will be included in its scope.

Action 28

Review the content of the driver CPC with a view to reforming the programme to ensure it remains relevant and useful for drivers

RSA, D/Transport, In consultation with Industry

Consideration of Fixed Charge Penalties for Road Safety Infringements by Commercial Drivers

One of the core objectives of RSA and AGS enforcement is to maximise voluntary compliance with road safety standards and to deter non-compliance.

Action 46 of the RSS provides that the RSA will seek to develop increased enforcement powers for both the RSA and AGS to deal more effectively with road safety infringements by commercial vehicles. This will include the adoption and expansion of fixed-charge penalties for certain road transport offences, where deemed necessary and appropriate. This important reform will also provide the RSA and AGS with additional, enhanced powers to enforce road safety standards against commercial vehicles on Irish roads, including out-of-State operators.

At present, where non-compliance is detected, there is a reliance on pursuing criminal prosecutions through the Courts system. This process can be both time- and resource-intensive for authorities and there is expenses associated with bringing a prosecution. Similarly, the process does not adequately deal with the issue of non-compliance at the time of detection. Furthermore, it is recognised that Court proceedings are not always the optimal way to deal with non-compliant out-of-State operators and drivers.

Common Risk Rating Formula

The RSA is the responsible authority in the State for the enforcement of EU rules relating to road transport activities, including drivers' hours rules, tachographs and working time of persons performing mobile road transport activities. To support enforcement of these EU rules, each Member State is required under Article 9 of Directive 2006/22/EC, as amended, to introduce a risk rating system for transport undertakings established in its territory. In Ireland, the RSA operates this system. The risk rating of each undertaking is based on the relative number and gravity of infringements of relevant EU rules detected in respect of that undertaking.

From 22 July 2023, the EU is implementing a new common risk rating formula (set out in Commission Implementing Regulation (EU) 2022/695) for the purposes of determining the risk rating of transport undertakings. The common formula will

The development of an enhanced and expanded enforcement toolkit (including fixed penalties) will strengthen the effectiveness of road transport enforcement and in particular will help to address limitations in the current system. It will better equip authorities to enforce standards and to deal with non-compliant operators and drivers in a more efficient and effective manner.

This action will require legislation to underpin it and consultation and engagement between the RSA and other stakeholders, such as the Department of Transport, the Attorney General's Office and the Office of the Parliamentary Counsel will be essential in the development of the required regulatory regime.

Action 29

Develop increased enforcement powers for both the RSA and AGS including the development of a proposal and public consultation regarding the introduction of fixed charge penalties for certain road transport offences.

D/Transport,
RSA

establish a harmonised approach across all Member States for calculating the risk ratings of transport undertakings.

Each Member State is required to ensure that the risk rating of the transport undertakings established in its territory is calculated in accordance with this new common formula.

The aim of the common formula is to contribute significantly to the harmonisation of enforcement practices throughout the Union, by ensuring that all drivers and transport undertakings are treated equally as regards checks and sanctions under the applicable EU rules; and to facilitate the exchange of information on risk rating scores in the context of cross-border enforcement.

Ultimately, the revised risk rating system will enable transport enforcement agencies to better focus resources on non-compliant/higher risk operators.

From 22 July 2023, the RSA will implement the common risk rating formula set out in Commission Implementing Regulation (EU) 2022/695 in respect of transport undertakings in Ireland. The Department of Transport will support the RSA through engagement with relevant stakeholder organisations in relation to the implementation of the new common risk rating formula.

Action 30

Implement the common risk rating formula	D/Transport, RSA
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Electronic Data Capture Solution for Recording Inspection Activity

In 2023 the RSA will modernise the current arrangements for data capture at roadside and premises checks by replacing the current paper-based inspection process with an electronic interface that feeds data, such as inspection forms, photographs and scanned documentation, directly into the Enforcement database. In addition to the efficiency benefits to the RSA by removing the need to re-enter handwritten inspection data and the associated GDPR and data quality issues that can arise from time to time, the main benefit of the project for vehicle operators is that they will have real time access to inspection data as opposed to the current situation whereby they may have to

wait up to 10 days after the date of inspection. This will improve road safety outcomes by alerting operators of any compliance issues that need to be addressed as early as possible so that actions can be taken.

Action 31

Implement an Electronic Data Capture solution for recording inspection activity	D/Transport, RSA
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6.6 | The EU Mobility Package & Road Transport Operator Licensing

Context and Background

Transport in the European Union is a shared competency of the Union and its Member States, and it was one of the first EU common policy areas. The objective was the creation of a common transport market, allowing freedom to provide services, and the opening up of national transport markets. For road transport, market opening was limited by so called 'cabotage rules' - an operator from one EU Member State could carry out only a limited number of operations in another Member State. This opening required a framework of rules to ensure a fair competitive environment and to protect the rights of drivers as workers - EU legislation was introduced on driving and rest times and on the use of tachographs to record these and on access to driving as a profession (licensing). General legislation on minimum wages for posted workers - those carrying out work in a member state other than their own - also applied to road transport.

There were challenges however in the full implementation and enforcement of these rules leading to claims of unfair competition by out of state operators, as well as concerns on road safety and driver welfare. In 2017, the European Commission's Mobility Package proposed significant changes to EU road transport rules, intended to better balance the objectives of safety,

social fairness, economic growth and sustainability. A summary of the main changes made in the Mobility Package is set out below.

The Mobility Package was controversial. A number of Member States have brought cases to the European Court of Justice challenging specific provisions, in particular rules requiring periodic return of the driver and vehicle to the home member state - these cases are ongoing.

Ireland has a legal obligation to implement the Mobility Package as adopted by the European Council and Parliament. Feedback received as part of the public consultation for the 10-Year Haulage Strategy has highlighted the continued importance of the Department engaging with stakeholders regarding the proper implementation and effective enforcement of new EU rules relating to the haulage sector.

In summary three packages of transport legislation were proposed by the Commission, known as Mobility Package 1, 2 and 3.

Mobility Package 1 comprised of four separate pieces of legislation all adopted in July 2020 focused on the functioning of the road transport market, the working conditions of drivers and licencing.

What has already been achieved?

Mobility Package 1 - Regulation (EU) 2020/1054 (amended EU legislation on driver hours)

The driving and rest times of commercial vehicles over a certain size have been closely regulated for many years for both road safety and social protection reasons. The original EU legislation dates back to the 1960s and EU legislation since the 1980s has mandated that certain vehicles use tachographs to record driving time. The rules are enforced throughout the EU using roadside checks by road transport authorities. In Ireland the RSA and An Garda Síochána are jointly responsible for

enforcement.

Revised driving and rest time regulations are in effect since 20 August 2020. Some of the main changes made are clarifications regarding the taking of a regular weekly rest in the cab of a vehicle and a change to the so called 'ferry rule', which governs limited interruptions of rest periods where drivers need to disembark from ferries during their journey. The 'return home' rule stipulates

that the haulage employer must organise work in such a way that drivers are able to return to the company's operational centre where the driver is normally based or to the place of residence of the driver once every 4 weeks. This rule is designed to ensure that there is a clear link between a driver and the operational base of their employer and to prevent drivers from being away from home for more than 4 weeks at a time.

Regulation 2020/1054 also provides for the mandatory introduction of an updated tachograph

technology, known as Smart Tachograph 2. New functionalities of the Smart Tachograph 2 include the automatic recording of border crossings and of loading and unloading activities. Not only can this functionality be used to enforce driver hours rules, it can also be used to enforce market access restrictions (cabotage) and the new posted driver legislation (see below). The mandatory roll-out of Smart Tachograph 2 will take place over the next number of years.

Mobility Package 1 - Regulation (EU) 2020/1055 (amended EU legislation on road operator licencing)

This Regulation makes changes to cabotage and licensing rules for road transport operators.

With regard to cabotage, since February 2022 there has been a mandatory four-day cooling-off period following three permitted cabotage operations being performed within a seven-day period, during which the operator cannot perform cabotage again in the same EU country with the same vehicle. New functionality defined for the Smart Tachograph 2 is intended to assist with enforcement of cabotage rules over the coming years. Cabotage by Irish operators in the EU or by EU operators in Ireland is not extensive however, and as such these new rules will have only a limited impact in the Irish context.

A number of changes have also been made to the

existing licensing regime for EU road transport operators, aimed primarily at tightening up the requirements on the establishment of businesses to address the issue of so-called 'letter-box companies', and at preventing vehicles from operating extensively in one member state whilst the control of the business is conducted from another state. Vehicles must now return to the country where the business of the operator is established at least once every 8 weeks.

Since May 2022, LLCVs weighing between 2.5 tonnes and 3.5 tonnes which are engaged in international transport require an operating licence.⁴¹

From 2026, these vehicles will be required to have a tachograph installed and to comply with drivers' hours regulations.

Mobility Package 1 - Directive (EU) 2020/1057 (the posting of workers in the road transport sector)

The EU Posted Worker regime has been in place since the first Posted Worker Directive in 1996. A "posted worker" is an employee who is sent by his or her employer to carry out a service in another EU Member State on a temporary basis. The Directive provides for the employment rights of such posted workers, including minimum wage, and is also designed to ensure a level playing field between domestic and foreign service providers.

Directive (EU) 2020/1057 is the so-called 'lex specialis' regarding the posting of workers in the road transport sector. This Directive sets out special regulations, separate to the main Posted Worker Directive, that apply only to commercial drivers in

the road transport sector. Since February 2022, EU hauliers doing international work are required to submit a posting declaration through a standardised, multilingual form on a digital platform and to keep certain documents on board in paper or electronic format to demonstrate compliance with posted worker rules.

The new legislation mixes elements of road transport law (driver hours and tachographs) with employment rights law. In Ireland, the RSA is responsible for driver hours enforcement and the Workplace Relations Commission is responsible for employment rights.

41 Applications can be made on the Road Transport Operator Licensing Online system - www.rtol.ie.

The EU-UK Trade and Cooperation Agreement (TCA)

The UK left the European Union on 31 January 2020 and as such the UK no longer applies the rules of the EU Single Market and Customs Union. The UK remains the most important country for Ireland from a road transport point of view given its proximity, the land border with Northern Ireland (NI), ferry links and the close social, cultural and trade links between the two countries.

Journeys between Ireland and the UK were largely governed by EU legislation when the UK was an EU Member State. This legal framework was replaced by the TCA on 1 January 2021. The TCA now governs all commercial road transport of goods between Ireland and NI and Ireland and Great Britain (GB), and all transit through the UK enroute to and from Ireland.

The TCA contains very detailed provisions on both the road transportation of goods and the road transportation of passengers between the EU and the UK.

In comparison to other sectors, the articles and annexes of the TCA provide for close post-Brexit

alignment between the EU and UK. This particularly applies to the road transportation of goods.

Annex 31 applies only to goods transport and contains detailed provisions based largely on the existing EU acquis in road transport. The Annex contains detailed provisions on licensing, driver hours, tachographs, Certificates of Professional Competence, vehicle standards, etc.

While the general Posted Workers Directive no longer applies between the EU and the UK, road transport is still subject to posting provisions in the TCA. This makes it the only sector of EU-UK cooperation where rules regarding the posting of workers are still in force.

An EU-UK Specialised Committee on Road Transport has been set up under the TCA to help implement the Agreement's provisions. Given the key role road transport plays in the trade in goods between the EU (including Ireland) and the UK, it is vital that the TCA is properly implemented in order to enable a fair and mutually beneficial trading relationship.

Licensing of Road Transport Operators

The Road Transport Operator Licensing (RTOL) unit based in Loughrea, Co. Galway is part of the Department of Transport, and has responsibility for the regulation of the commercial road transport sector.

RTOL has responsibility for issuing road transport operator licences to those operating either road haulage or road passenger transport operations for hire or reward. Licences are typically issued for a five-year period to operators who satisfy the

licensing requirements.

In 2022, RTOL issued approximately 1,000 road haulage operator licences and 400 road passenger transport operator licences. In addition, the Unit processed around 7,000 vehicle change applications from licensed operators wishing to add, substitute or remove vehicles on their licences. At end 2022, there were 23,000 vehicles authorised on road haulage operator licences, the highest figure on record.

Short-Term Priorities

Implementation of EU Mobility Package

Effective implementation of the new road transport rules in the EU Mobility Package and the TCA, including national legislation where required, is a key short-term priority for the Department of Transport, working closely with the RSA to develop legislation that is fit for purpose. It is anticipated that Mobility Package 1 and the aligned TCA elements will be transposed into Irish law in early 2023.

Along with introducing the new rules, a priority for the Department of Transport will be providing information for operators on the new EU rules. The Department will continue to engage with stakeholders regarding the proper implementation and effective enforcement of new EU rules relating to the haulage sector and will communicate with operators regarding their new responsibilities to ensure effective domestic enforcement.

To further strengthen this engagement with stakeholders, the Department of Transport will keep the proposed Road Freight Forum apprised of EU developments and the implementation of new EU laws and will seek the Forum's views on international engagements, such as those with the EU and the UK, where appropriate.

Action 32

Implement the EU Mobility Package	D/Transport, RSA
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Transport Manager Certificate of Professional Competence (TM CPC)

Every road transport undertaking must hold an Operator Licence in order to operate for hire or reward, and one of the conditions of the licence is that the operator must have a qualified Transport Manager. A Certificate of Professional Competence in Road Transport Management (TM CPC) is a qualification that allows the holder to act as transport manager in a road transport undertaking.

The Chartered Institute of Logistics and Transport (CILT) is the body currently responsible for administering TM CPC examinations and awarding the certificate in Ireland, on behalf of the Department of Transport.

In 2022, RTOL engaged the consultancy firm Grant Thornton, to carry out a review of the TM CPC regime and to examine options to develop and enhance the programme.

The work undertaken for the review included the following:

1. A comprehensive review of the TM CPC, including:
 - Examining and evaluating proposals from CILT as current examining authority
 - Examining the current training manual and the examination question bank and identifying areas for improvement
 - Reviewing TM CPC policies and procedures in other Member States, including quality

assurance in CPC administration, syllabus, courses and exams the setting of training standards and the administration of certificate issuance and records.

2. An examination of the position in other Member States regarding the requirement for a training course to be completed before taking the TM CPC examination, with consideration of the benefits or otherwise of continuing to maintain this requirement in Ireland.
3. An examination of the position regarding the provision of continuing professional development / refresher training in other Member States with a view to making recommendations on whether and how such training might be delivered and monitored in Ireland.

The Grant Thornton report is expected to be finalised by the end of 2022 and the Department will consider its recommendations thereafter for decision and further implementation.

Action 33

Finalise the review of the Transport Managers CPC regime and establish an implementation plan based on its recommendations	D/Transport
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New IT System for Road Transport Operator Licensing

In line with RTOL's business plan objectives, effective customer service and a suitable online licence management and monitoring system are crucial to supporting a competitive and safe commercial road transport sector.

In 2023, RTOL will begin work to build a new IT system to support the licensing process. In collaboration with the Driver and Vehicle Computer Services Division (DVCS), evaluation

and awarding of a contract to replace the current RTOL IT Licensing System was completed at the end of 2022. Design and build of the new system will commence in early 2023.

It is expected that the new system will go live in 2024. It will bring a number of system improvements for both RTOL and end-users, including:

- extending the online portal services, enabling road transport operators to conduct a wider range of self-service transactions online
- enabling full digital applications, without the need for separate submission of paper documents.

The system will also be more user friendly and intuitive and will allow users to save their applications in draft form for later submission.

It is planned that the new system will interface with other Government systems including the National Vehicle and Driver File (NVDF) database, Revenue Commissioners, Companies Registration Office, the RSA as well as with other Member States via the European Register of Road Transport Undertakings (ERRU) interconnection. ERRU

provides information on the validity of community licences, on the good repute of transport managers and on infringements committed by transport undertakings in a foreign territory. ERRU also has new functionality requirements contained in new legislation such as notification of a check result and the checking of a transport undertakings data which will be included in the new system build.

Action 34

Deliver a new IT system for the processing of road transport operator licenses to include digital and customer service enhancements

D/Transport

Enablers for Medium to Long-Term Progress

Taking an active role in formulation of EU Legislation

The Department of Transport will maintain engagement with stakeholders to represent Ireland's interests on EU files and in respect of the TCA. For example, the Department is currently engaging with other Member States and sectoral representatives on the upcoming possible revision of the Combined Transport Directive which was originally adopted in 1992 to increase the share of rail, short sea shipping and inland waterways in total freight transport, thereby reducing GHG emissions as well as other negatives such as congestion and accidents by limiting the lengths of the road legs.

Thirty years after the adoption of the Directive, an evaluation of this Directive found that the support measures and framework rules stimulated combined transport, but the impacts were insufficient to enable the achievement of the objectives of the Green Deal and the associated Sustainable and Smart Mobility Strategy.

The Department representing Ireland can contribute to updating the Directive and communicate the perspective of operators from island nations such as Ireland in terms of connectivity, whilst maintaining the central objective to shift to greener freight options to achieve the targets in the EU's Green Deal.

EU legislation for road transport will continue to evolve. Mobility Package 2, or the Clean Mobility Package, includes several legislative proposals for

the road transport sector which aim to accelerate the transition to low and zero emission vehicles and fight climate change. Some of the key changes proposed include the Clean Vehicles Directive and the possible revision of the Combined Transport Directive.

Additionally, the Commission has committed to an evaluation of Directive 96/53/EC, as amended, which sets the maximum weights and dimensions of heavy-duty vehicles used in domestic and cross-border transport to ensure the free movement of goods within the single market. Under current EU rules, commercial vehicles carrying goods or passengers by road must adhere to the permitted maximum weights and dimensions. The evaluation will consider potential amendments with a view to:

- Clarifying and streamlining cross-border rules, taking account of new digitalisation and communication technologies;
- Supporting the uptake of low- and zero-emission fuels and technologies in the sector; and
- Safeguarding or improving road safety around the use of heavy-duty vehicles.

The evaluation of the Directive will require an assessment of potential impacts to industry (economic impacts and as a means to address sectoral personnel shortages), road infrastructure and a potential reduction in carbon emissions from

the heavy-duty sector. Publication is expected in Q2 2023.

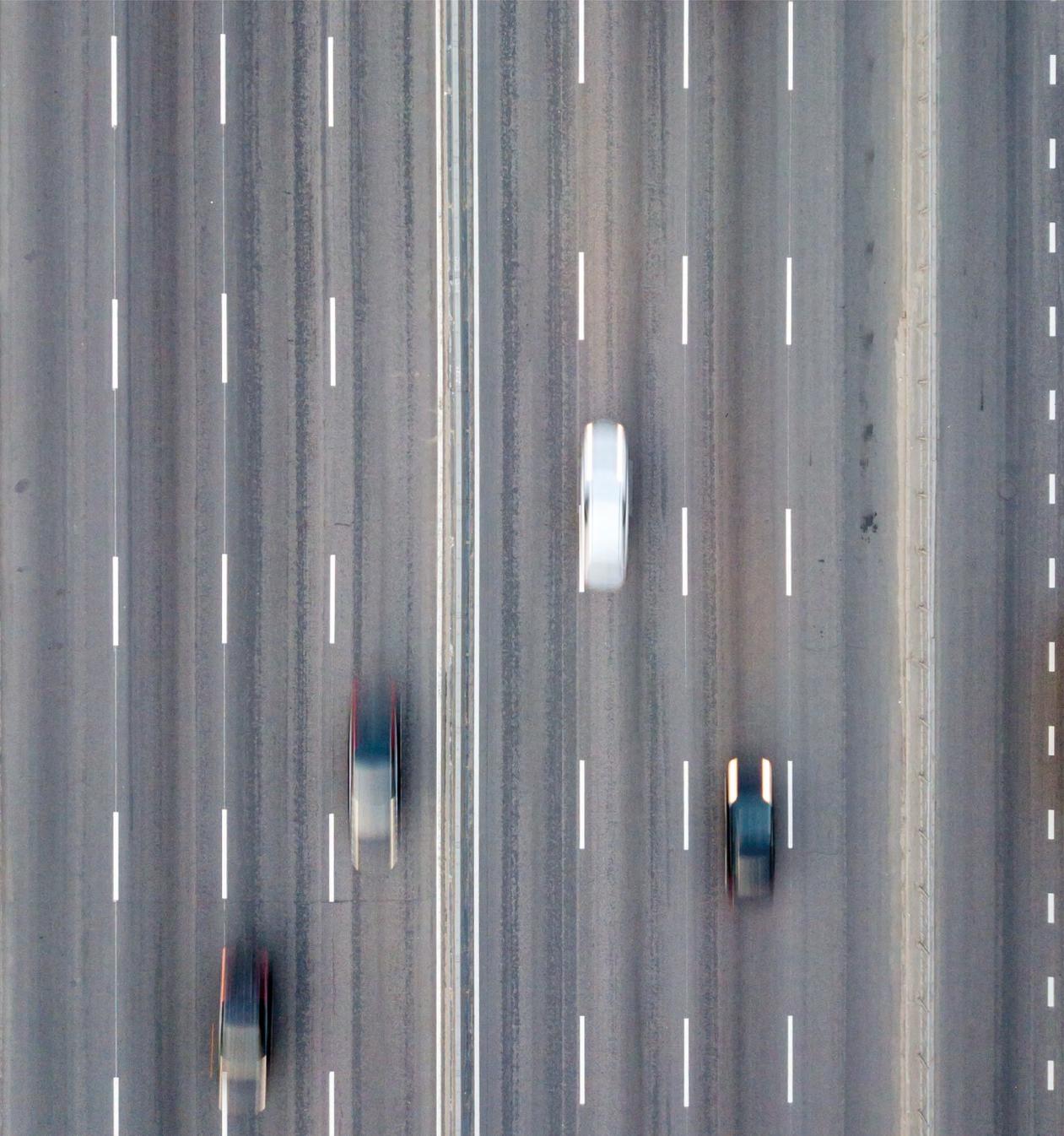
The focus of Mobility Package 3 is safe mobility and it confirms the EU's long-term goal of 'Vision Zero' – moving close to no fatalities and serious injuries by 2050 – with an interim target of halving such casualties between 2020 and 2030.

The Package includes initiatives on CO2 standards for Heavy Duty Vehicles, the digitalisation of freight transport documents and infrastructure safety management.

Action 35

Continue to take an active role in negotiations shaping EU Transport Legislation

D/Transport





6.7 | Labour Market & Skills

Context and Background

The Expert Group on Future Skills Needs in its 2018 report on the [implications of Brexit](#), highlighted critical skills gaps in key areas of the Freight Transport, Distribution and Logistics (FTDL) sector, with particular emphasis on the HGV driver shortage. The Public Consultation on this Strategy once again demonstrated the importance of these issues to the sector, stressing the need for interventions to raise the profile of the FTDL sector, enhance its attractiveness to potential new entrants and upskill current employees. It recommended increased and better -marketed training and education provision for those engaged in FTDL activities, to help towards current skills shortages and recruitment difficulties. Enhancing the visibility and availability of career opportunities in these sectors was also identified as important in order to attract and retain new employees.

The Logistics and Supply Chain Skills Group (LSCSG) was established in 2019 to develop and deploy practical actions to address the skills needs of the logistics and supply chain sector – including road haulage – in a collaborative manner. The membership of the LSCSG includes haulage and logistics sector representatives, education and training providers and all relevant Government Departments and agencies. The Group is currently

Working Conditions of HGV Drivers

Some respondents to the public consultation on the development of this strategy highlighted current working conditions of drivers as a barrier to overcoming the HGV driver shortage, and one stakeholder suggested that the promotion of social dialogue and collective bargaining between the social partners in this sector is needed to comprehensively address these issues. An EU directive on minimum wages and collective bargaining was adopted by the European Council in October 2022 with a focus on strengthening collective bargaining structures in EU Member States. A report by the Labour Employer Economic Forum in Ireland⁴² to review collective

chaired by the Department of Transport and provides an excellent forum for collaboration and the planning of practical solutions to help address these skills needs.

The HGV driver shortage is a global issue. Demand for road freight transport is increasing annually, while at the same time more HGV drivers are exiting the industry than entering it. In Europe, the road transport sector is facing a critical driver shortage and the issue has become more acute in recent years. In Ireland, there is a large proportion of small owner-operator haulage businesses, many of them family-run.

In the short term, recruitment of drivers from abroad can fill some part of this labour market gap – Ireland has driving licence exchange agreements covering HGV licence categories with a number of third country states and more of these agreements are being pursued by the RSA. Foreign recruitment is not without its challenges however, and it is unlikely that it will ever be able to completely cover the shortfall in HGV drivers in Ireland. Therefore, a more sustainable solution which attracts young people and diverse talent into the sector is needed in order to support its growth and development in the years ahead.

bargaining and the industrial relations landscape was also published in October 2022. DETE is currently considering the report and consulting with stakeholders to develop proposals for the Government in respect of its implementation. These proposals will include an examination of whether the report recommendations need to be incorporated into legislation.

42 [Final Report of the LEEF High Level Working Group on Collective Bargaining](#)

Feature Piece – Women in Transport

The 2020 ITF Gender Dimension of the Transport Workforce publication noted that women remain underrepresented in most transport-related industries, with only 17 percent female employees on average across a sample of 46 countries. Both attracting and retaining women remains a challenge for governments and the private sector.

Published in September 2022, the 'Gender Equality and the Role of Women in Decarbonising Transport' report examines the linkages between gender equality, transport and climate change to better understand the development of policies that can achieve both gender equality and transport decarbonisation goals by 2050. The report provides guiding principles with specific actions to help countries and companies align their gender equality and transport decarbonisation goals and identify examples of existing good practice.

The report identified that a consistent approach to incorporating a gender dimension into decarbonising transport policies for users and improving the gender balance in the transport workforce would have a significant impact. It sets out four groups of 'guiding principles':

- Capacity building, knowledge management and communication
- Gender balance, participation and women's leadership
- Implementation
- Monitoring and reporting

On 9 December 2020 the European Commission published the 'Sustainable and Smart Mobility Strategy'. Included under the heading 'Flagship 9 – Making Mobility Fair and Just For All' it notes that the ongoing digital transformation presents new opportunities, such as an improved working environment and quality jobs that could become more attractive for women and young people. Therefore, a credible path is needed for the just transition for transport workers. The Commission will issue recommendations for the transition to automation and digitalisation and on means to mitigate their impact on the transport workforce.

Finally, in order to address the growing shortage of skilled workers, the Commission is calling on transport stakeholders and social partners to contribute to the implementation of the European Skills Agenda for sustainable competitiveness, social fairness and resilience and in particular to join the Pact for Skills⁴³ - a shared engagement model for skills development in Europe for companies, workers, national, regional and local authorities, social partners, cross-industry and sectoral organisations, education and training providers, chambers of commerce and employment services.

The Commission will duly apply equality mainstreaming to its transport-related policy initiatives and continue to support stakeholder cooperation and exchange of good practices on the "More Women in Transport – Platform for Change", to increase the number of women in transport professions. The objective of the Women in Transport - EU Platform for Change, launched on 27 November 2017, is to strengthen women's employment and equal opportunities for women and men in the transport sector thanks to the actions of Platform members. It will also serve as a forum to discuss and exchange good practices. The Platform will raise awareness on equality issues by setting up and supporting a network of Diversity Ambassadors. Any future proposal for transport will be compliant with the Commission's Gender Equality Strategy and Disability Strategy.

43 [Pact for Skills - Employment, Social Affairs & Inclusion - European Commission \(europa.eu\)](https://ec.europa.eu/euro-observatory/en/observatory/flagship-9)

What has already been achieved?

LSCSG Recommendations on Driver Shortage Published

In 2021, the LSCSG was asked to examine the HGV driver shortage and make recommendations with specific regard to actions that could be taken by Government and the industry. These recommendations were finalised at the end of 2021 and have been published on the [gov.ie](https://www.gov.ie) website. The recommendations are aimed at improving the supply issue, without undermining the working conditions and health and safety of drivers or other road users. Short-, medium- and long-term actions have been identified, and discussion on

the implementation of these recommendations is a standing agenda item at the quarterly meetings of the LSCSG.

The LSCSG has also finalised and published two Information Notes aimed at increasing the number of professional HGV drivers in Ireland. The topics of these Notes are as follows:

- [How to qualify as a HGV driver in Ireland](#)
- [Requirements for recruitment of HGV Drivers who are non-EEA citizens.](#)

New Third Level Courses, Apprenticeships and Traineeships in Logistics and Supply Chain

In response to the need identified for new educational programmes in logistics and supply chain, apprenticeships and traineeships are now being offered, in partnership with industry stakeholders, at several third-level educational institutions. The apprenticeships on offer include the Logistics Associate Apprenticeship at Technological University Dublin and the Transport Operations & Commercial Driving Apprenticeship at the Atlantic Technological University (ATU), which is Ireland's first academic qualification for commercial driving.

Traineeships available include the Logistics and Distribution Traineeship, which provides the skills and knowledge to manage effective and efficient supply chain services. Content can include business and finance management, purchasing and procurement and inventory management.

This traineeship typically lasts 52 weeks and includes a minimum of 30 percent on-the-job training. Upon completion, trainees may receive a QQI-FE Level 6 in Supply Chain Logistics. The HGV Traineeship 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 & Guilds. The aim of the course is to provide learners with the skills and related knowledge in the rules of the road, driving a HGV – both rigid and articulated bodies – care and maintenance of the vehicle, loading and unloading the vehicle, customer care and documentation and to develop personal effectiveness and job-seeking skills. This traineeship course is currently offered by seven regional Education and Training Boards.

Transport Operations and Commercial Driving Apprenticeship

The Transport Operations and Commercial Driving Apprenticeship provides an academic qualification, practical training and work experience to apprentices looking to begin a career in the freight distribution and logistics sector. The apprenticeship, which is taught out of the Atlantic Technological University's Sligo campus, was developed by a consortium led by FTAI and featuring other key stakeholders such as SOLAS and the Higher Education Authority. This course is a direct response to the industry need for professionally trained drivers and is the first qualification on

the national framework of qualifications (FETAC Level 6) linked with the profession of Commercial Driving. Launched in May 2022, it currently has 21 enrolled apprentices as part of its first intake and this number is expected to grow in future years.

Skillnet Ireland & CILT Mobility & Supply Chain Skillnet

Skillnet Ireland is a business support agency of the Government of Ireland, responsible for advancing the competitiveness, productivity and innovation of Irish businesses through enterprise-led workforce development, facilitating increased participation in enterprise training and workforce learning in Ireland. Skillnet Ireland allocates funding to groups of businesses in the same industry sector (or region) which have similar training needs, so they can collaborate to deliver subsidised training for their teams. This funding is provided by the Department of Further and Higher Education, Research, Innovation and Science through the National Training Fund.

One of these Business Networks is the CILT Mobility and Supply Chain Skillnet - a learning network for enterprises of all sizes within the transport, logistics and supply chain management sectors. Between 2020 and 2022, the CILT Mobility and Supply Chain Skillnet provided skills development opportunities and ongoing professional development to over 4,000 individuals from 953 FTDL companies. In addition to its regular training programmes, the CILT Skillnet also delivers the Clear Customs programme, which seeks to educate companies, including haulage operators, on the customs procedures that were put in place following the UK's departure from the European Union.

Information & Promotional Material re Careers, Education & Training in Logistics and Supply Chain

The LSCSG published a comprehensive '[Overview of Existing Education and Training Provision in Logistics and Supply Chain](#)' in February 2022. This is a comprehensive and dynamic inventory of available education and training courses, including third level programmes, apprenticeships, Springboard, SOLAS-funded Further Education and Training courses, Quality and Qualifications Ireland courses and private company training opportunities. This document is updated as and when new courses become available.

In order to further promote careers in the Logistics and Supply Chain sector to students in second level education, the LSCSG has produced a careers brochure explaining what logistics and supply chain is, outlining the variety of roles on offer and highlighting the opportunities for career progression. The LSCSG has ongoing engagement with the Institute of Guidance Counsellors to encourage the use of these materials as part of career guidance programmes in secondary schools.

Short-Term Priorities

Additional Driving Licence Exchange Agreements

During 2022, the RSA held discussions with Argentina, Moldova, North Macedonia and Ukraine towards potential driving licence exchange agreements covering HGV categories. While the RSA did not recommend proceeding with an agreement with Moldova, a recommendation in respect of Argentina and North Macedonia is expected shortly.

While discussions with Ukraine were put on hold following the outbreak of conflict there, the subsequent adoption of an EU measure recognising Ukrainian driver documents came into force on 27 July 2022. Under the EU Regulation 2022/1280, all categories held on a Ukrainian licence are recognised.

A person with C or D categories on their licence (trucks and buses) must have a driver CPC to

drive a truck or bus professionally in Ireland. The EU Regulation allows for recognition of Ukrainian CPCs, subject to the holder undergoing additional compulsory training. As of the end of 2022, the RSA is developing a compulsory training programme and legislation is being finalised to underpin this.

Action 36

Conclude consideration of potential for licence exchange agreements with North Macedonia and Argentina and commence consideration of further new agreements

RSA

Logistics and Supply Chain Skills Week

The LSCSG is currently planning an inaugural Skills Week for the Logistics and Supply Chain sector, which is provisionally scheduled to take place from 27 March–1 April 2023. The Skills Week will feature numerous events across the country aimed at promoting careers in the sector and will include a national logistics recruitment event, as well as events organised in cooperation with stakeholders and representatives from Government, academia and industry. Events will be held both in person and online.

Action 37

The LSCSG will organise an inaugural Skills Week for the Logistics and Supply Chain sector

LSCSG

Enablers for Medium to Long-Term Progress

Research Studies related to Logistics and Supply Chain

As one of the HGV Driver Shortage Recommendations, the LSCSG is currently looking to establish collaborative, funded and focused research workstreams, to provide input data that will help better understand and respond to the challenges facing the haulage industry.

A key priority is improving the gender balance and diversity in the industry. Encouraging recruitment among under-represented groups will help to alleviate the HGV driver shortage and make haulage more inclusive and representative of the Irish population as a whole.

There is also a need to evaluate the working conditions of HGV drivers to assess how these could be improved and to make these roles more attractive. This may require innovative solutions. One consequence of Brexit has been an increase in the proportion of unaccompanied LoLo freight as compared to RoRo, which is carried out by truck and requires drivers to journey abroad. Moving with this change and encouraging the switch from RoRo to LoLo would require fewer HGV drivers and less travel abroad, allowing for a better work/life balance.

Action 38

The LSCSG will continue its work to promote careers in logistics and supply chain and will continue to monitor the implementation of the Recommendations To Help Alleviate The HGV Driver Shortage

LSCSG

Action 39

The LSCSG will look to establish research workstreams on the attractiveness of the industry – improving gender balance and diversity, improving working conditions and work/life balance

LSCSG



7 | Delivering the Haulage Strategy

The delivery of this Strategy will involve cooperation among stakeholders from Government Departments, agencies, industry and academia. To support this cooperation, a dedicated Coordination and Implementation unit will be created in the Department of Transport. The Coordination and Implementation Unit will have access to a project budget for a number of the actions arising out of this strategy. It will also work collaboratively with other divisions of the Department of Transport and other Government Departments and agencies where relevant.

The Road Freight Forum will bring together relevant Departments, agencies, and industry with the overall goal of driving implementation of the Strategy – it will meet 3 times a year or as required to deal with emergency matters. The Road Freight Forum may establish subgroups to deal with particular issues as needed.

The Department of Transport, along with the Department of Enterprise Trade and Employment, the Department of Further and Higher Education, Research, Innovation and Science and the Department of Social Protection will continue to provide support to the ongoing work of the LSCSG.

As described earlier, the Road Freight Forum will link with the Brexit Stakeholder Forum and National Emergency Planning Coordination structures as needed. There may also be value in the Road Freight Forum engaging with the NTA, Local Authorities and Regional Assemblies on the development of urban and regional freight strategies.

The Road Freight Forum will act as the overarching forum for stakeholders. Other groups will provide support and align with the work of the Road Freight Forum.

This Strategy will be formally reviewed in 2027 by the Department of Transport, providing an opportunity to evaluate, assess and modify mid- and long-term enablers and actions as required.

Annex 1 Road Haulage Strategy Actions

No.	Action	Lead Owner & Supporters
Action 1	Establish a Road Freight Forum with representatives from relevant Government Departments, Agencies and the haulage, freight distribution and logistics sector	D/Transport
Action 2	Commission a study to establish current data availability and quality, identify key data gaps and explore at a high level how these might be filled	D/Transport, NTA, & TII, in consultation with Industry
Action 3	Following completion of the data audit; engage with stakeholders to identify data sources or collection points which can be used to fill the identified data gaps	D/Transport, NTA, & TII, in consultation with Industry
Action 4	Advocate for and support EU regulations that promote more stringent HGV vehicle emission standards	D/Transport
Action 5	Establish a national certification/accreditation system for eco-driving courses. Consider mechanisms/incentives for operators to adopt and maintain eco driving practices, including potential integration into the Driver CPC programme	D/Transport
Action 6	Complete study examining the feasibility of Freight Consolidation Centres to consolidate and rationalise freight transport & identify next steps	D/Transport, TII
Action 7	Conduct a study to examine the role of biofuels tax and inform renewable transport fuels policy development	D/Transport
Action 8	Launch a call to the private sector re specific transport operations which may be suitable for a Longer Semi-Trailer Trial	D/Transport, RSA, TII
Action 9	Examine policy options, including funding supports, to reduce carbon emissions through operational and digital efficiencies and assess how they will play a role in Ireland's journey to net zero	D/Transport & Industry
Action 10	Continue to negotiate at EU level in support of an ambitious EU Green Deal and to ensure Ireland's interests are reflected in the EU Fit for 55 legislative package	D/Transport
Action 11	Support ZEVl office work on infrastructure, energy and AFIR requirements from the perspective of heavy goods freight, leading to the 2025 EV Infrastructure Strategy Review which will determine optimal interventions to facilitate and enable the provision of charging infrastructure for HGVs	D/Transport
Action 12	Update National Policy Frameworks on the use of Alternative Fuels in Transport	D/Transport

Action 13	Maintain the Alternatively Fuelled Heavy Duty Vehicle Grant Scheme at least until 2027 and look to increase funding available under the Scheme to support fleet renewal	D/Transport
Action 14	Develop a national Hydrogen Strategy, including consideration of how hydrogen can play a role in the decarbonisation of heavy goods road freight.	DECC, D/Transport
Action 15	Continue to examine the scope for behavioural change through an emissions-based taxation for commercial vehicles	D/Finance
Action 16	Support the Whole of Government Circular Economy Strategy	DECC, D/Transport
Action 17	Ensure the infrastructure strategy for the national road network, National Roads 2040, takes account of the needs of the haulage and road freight sector	TII
Action 18	Advance Better Road User Charging Evaluation (BRUCE) - Draft implementation plan by Q2 2023	TII
Action 19	Map the current infrastructure available to haulage and freight including rests stops and refuelling stations and identify priority projects for advancement	TII, D/Transport
Action 20	Fulfil the requirements of the future TEN-T Regulation including in relation to upgraded road infrastructure, safe and secure parking and recharging and refuelling infrastructure	D/Transport, TII
Action 21	Advance further phases of the Better Road User Charging Evaluation (BRUCE) project from end 2023 to post 2030	D/Transport, TII
Action 22	Complete All Island Strategic Rail Review and consider future strategic use of rail network for freight	D/Transport
Action 23	NTA to lead, in consultation with key stakeholders, the development of Strategies for Sustainable Freight Distribution for the Greater Dublin Area and the Metropolitan Areas Cork, Galway, Limerick and Waterford	NTA, TII, Local Authorities
Action 24	Regional Assemblies, with the NTA, to lead the development of Regional-Level Freight Strategies in consultation with key stakeholders, consistent with the objectives of the RSEs	Regional Assemblies, NTA
Action 25	Ensure that the road freight sector and its importance for Ireland is considered as part of all transport strategy documents and policies, including the new National Ports and the review of the National Aviation Policy	D/Transport
Action 26	Subject to final agreement at EU level, carry out a market and prospective analysis on multimodal freight terminals and to ensure the development of at least one multimodal freight terminal in the vicinity of each urban node	D/Transport

Action 27	Draft and formulate a National Safe Work-Related Road Safety Code of Practice	RSA, HSA
Action 28	Review the content of the driver CPC with a view to reforming the programme to ensure it remains relevant and useful for drivers	RSA, D/Transport, in consultation with industry
Action 29	Develop increased enforcement powers for both the RSA and AGS including the development of a proposal and public consultation regarding the introduction of fixed charge penalties for certain road transport offences	D/Transport, RSA
Action 30	Implement the common risk rating formula	RSA, D/Transport
Action 31	Implement an Electronic Data Capture solution for recording inspection activity	RSA, D/Transport
Action 32	Implement the EU Mobility Package	D/Transport, RSA
Action 33	Finalise the review of the Transport Managers CPC regime and establish an implementation plan based on its recommendations	D/Transport
Action 34	Deliver a new IT system for the processing of road transport operator licenses to include digital and customer service enhancements	D/Transport
Action 35	Continue to take an active role in negotiations shaping EU Transport Legislation	D/Transport
Action 36	Conclude consideration of potential for license exchange agreements with North Macedonia and Argentina and commence consideration of further new agreements	RSA
Action 37	The LSCSG will organise an inaugural Skills Week for the Logistics and Supply Chain sector	LSCSG
Action 38	The LSCSG will continue to promote careers in logistics and supply chain and oversee the implementation of the Recommendations To Help Alleviate The HGV Driver Shortage	LSCSG
Action 39	The LSCSG will look to establish research workstreams on the attractiveness of the industry - improving gender balance and diversity, improving working conditions and work/life balance	LSCSG



Annex 2 Stakeholders & Strategy Development Process

The Department of Transport would like to thank all stakeholders who contributed to the development of this strategy as set out below.

Further information on the Strategy development process and the 2 public consultations held is available at - <https://www.gov.ie/en/consultation/0dfc7-public-consultation-on-ten-year-strategy-for-the-haulage-sector/>

<https://www.gov.ie/en/consultation/e3c08-second-public-consultation-on-ten-year-strategy-for-the-haulage-sector/>

Submission Party

Submissions Received during First Consultation

Authentic Energy Management Services (AEMS)

Bridgestone Ireland

Chartered Institute of Logistics and Transport (CILT)

Circle K

Clavin Transport Services

Clean Ireland Recycling

Dileep Kumar Reddy

Dublin Airport Authority

Dublin Port Company

Education and Training Boards Ireland (ETBI)

Elsatrans

Eurotran

Exceptional Load Services Ltd

Fingleton White

Fleet Transport Magazine

Forestry Industry Transport Group

Freight Transport Association of Ireland (FTAI)

Galway Harbour Company

Gas Networks Ireland (GNI)

Glennon Brothers

Hydrogen Mobility Ireland
Iarnród Éireann
Ibec
Irish Exporters Association (IEA)
Irish International Freight Association (IIFA)
Irish Road Haulage Association (IRHA)
KT Business Skills ICE Group
Masterlink
Mayo, Sligo & Leitrim Education and Training Board (MSLETB)
Mid-West Regional Skills Forum
Nolan Transport
Polar Ice Ltd
Road Safety Authority (RSA)
Sean Lawler
SGS Ireland
SOLAS
South Coast Logistics
South East Regional Skills Forum
Southern Regional Assembly
UPS
Transport Infrastructure Ireland (TII)
Verona Murphy
Submissions Received During Second Consultation
2050 Group
Chartered Institute of Logistics and Transport (CILT) Mobility & Supply Chain Skillnet
Chemco Ireland Ltd
Clontibret Transport Limited
Dennison Trailers (1)
Dennison Trailers (2)
Duffy Express Freight
Eoin Gavin Transport Limited
Freight Transport Association Ireland (FTAI)
Galway Cycling Campaign
Hireco Group Limited
Ibec

Indaver Ireland Limited
Irish Congress of Trade Unions (ICTU)
Irish Exporters Association (IEA)
Irish Road Haulage Association (IRHA)
Michael McMahon
National Transport Authority (NTA)
O'Toole Transport Limited
Road Safety Authority (RSA)
Scania Ireland
Shannon Chamber
Southern Regional Assembly
T&R Lowey International Ltd
Transport Infrastructure Ireland (TII)
UPS
Vodafone Ireland

Notes

Department of Transport
[gov.ie/transport](https://www.gov.ie/transport)



An Roinn Iompair
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