



An Roinn Iompair
Department of Transport

Ireland's Road Haulage Strategy 2022–2031

Second Public Consultation
Submissions by Recipient

Overview

On 15 December 2022, the Government published Ireland's Road Haulage Strategy 2022–2031, following two phases of public consultation. Implementation of the short-term actions contained in the Strategy has begun and their progress will be monitored by a new Road Freight Forum, which consists of relevant stakeholders from Government and the haulage and road freight sector.

The first public consultation phase was launched in April 2021, seeking stakeholder and citizen views on its development. This consultation ended in July 2021 and a total of 43 submissions were received. Respondents included State bodies; academia; industry interest groups; private individuals; and elected representatives, amongst others. 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 in July 2022 based on that analysis.

A second public consultation on the Road Haulage Strategy was launched on 9 November 2022 and closed on 30 November. A total of 28 submissions were received as part of the second consultation, with one of these being received after the deadline for submissions had passed. Respondents included State bodies, haulage businesses, industry interest groups and non-governmental organisations (NGOs), amongst others. The submissions received are included in full below.

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Department of Transport
haulagestrategy@transport.gov.ie

Submission to The Second Consultation on the Ten Year Strategy for the Haulage Sector

Dear Sirs,


2050 Group would like to welcome this opportunity to contribute to Ireland's Ten Year Strategy for the Haulage Sector. The basis of this response focuses on the core area around Sustainability and Decarbonisation.

The founders of the 2050 Group have extensive experience of developing commercial scale biorefineries; and of the licenced shipping and retailing of energy on the UK & Irish gas and electricity networks. The 2050 Group has a core focus of producing and supplying alternative fuels to the Heavy Goods Vehicle (HGV) sector. To that end we are convinced there is no silver bullet and an array of alternative fueling solutions should prevail. Slowly adopting each alternative fuel, as new vehicular solutions become available.

HVO is the immediate drop in fuel, but it is not transitional. Bio-CNG is the quickest and most robust transitional fuel away from diesel. However, infrastructure is an ongoing issue. Methane is simply a cleaner burning fuel than diesel. Bio-CNG when sourced from wastes and residues like farm manures and straw generates a negative GHG effect. Not neutral, not net zero but negative! And Ireland has manure in an abundance. BEV's and FCEV's for the HGV sector are certainly in development but not near term as yet.

2050 Group has mapped Ireland for the development of suitable but large scale alternative refueling stations for HGV's. Using four key criteria 2050 Group has overlapped the main road network; the gas grid network; major towns/industrial areas and data on vehicular movements around Ireland. This exercise determined that forty six locations would have the ability to provide alternative refueling solutions to 80% of registered HGV's.

The current refueling network of stations are simply not fit for purpose to deliver the solutions needed, at the scale needed, to allow haulage operators to have the



confidence to invest in more expensive alternatively fueled vehicles. When hauliers make decisions to purchase new trucks, they do so with a minimum 5 to 7 year outlook. Given that in your own statement more than 50% of the current HGV fleet is 10 years or older, it can only be reasonable to suggest purchasing decisions today will be impacting Ireland's GHG targets well into the 2030's. A clear strategy is needed to provide hauliers with the confidence that a network of alternative refueling stations will be developed.

GNI and their partners to date have delivered four publicly available CNG stations. Progress has been difficult and has fallen well short of delivering the first 11 stations by 2020, from a starting position in 2017. This lack of delivery from a national infrastructure organisation has knocked the haulage industries confidence, when deciding to invest in alternatively fueled CNG/Bio-CNG trucks. More effort is needed from DfT and the CRU to enable faster roll out of this infrastructure.

This leads to a further issue of access to Bio-CNG. Many haulage operators and the firms they undertake work for, are now acutely aware that there is little point adopting gas powered trucks unless they have access to Bio-CNG. The current crisis in Ukraine, triggering volatile and higher gas commodity prices, has resulted in many operators opting to park these vehicles and default back to diesel.

2050 Group is currently developing its first large scale biorefinery in the UK. This production facility is expected to come online in mid 2024 and deliver enough Bio-CNG to refuel 1,000 Heavy Goods Vehicles daily. 2050 Group will have the ability to deliver this Bio-CNG to Ireland, via the gas grid and retail it to haulage operators. Provided there is an adequate refueling infrastructure in place.

The alternative refueling infrastructure needed and referenced above should be developed to easily adopt other fuels in the future for example BEV and FCEV for HGV's. Bio-CNG can be used at each location to provide electricity and hydrogen, completely independent of the electricity network. However, having access to both gas and electricity networks brings additional advantages.

One of our founders currently operates a Bio-CNG powered truck through a separate company. We have first hand experience of what these vehicles are capable of, in the need to transition away from diesel. This vehicle operates on average, at a gross vehicle weight of 37 tonnes daily, on one of the toughest routes in Ireland between Dublin and Donegal. As an operator, more refueling points and a secure source of Bio-CNG, would incentivise greater investment in the path away from diesel.

James Dorman
2050 Group, Founder
info@2050group.ie

Brendan Meighan (Transport)

From: Niall Hanley | Chemco <[REDACTED]>
Sent: Friday 25 November 2022 11:44
To: Transport haulagestrategy
Subject: RE: 10 year National Haulage Strategy

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To whom it may concern,

We at Chemco Ireland LTD understand that a 10 year road haulage strategy is in preparation by the department.

We believe that the strategy is looking at a pilot of longer trailers up to 15.65m.

We believe that the department should now champion and promote the European modular system with weights of up to 60T and 25.25m in length. This system allows for a 54% increase in pallets or equivalent floor space versus 15% with the 15.65m LST.

In addition, the European system is best for fuel efficiency, overcoming the driver shortage and less congestion on the roads. Furthermore, it is a very environmentally friendly system with Co2 savings of 25%.

Kind regards,
Niall Hanley – Fleet Service Lead.

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CHEMCO

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Ref - Ireland's Road Haulage Strategy 2022–2031

To Whom It May Concern:

CILT Mobility & Supply Chain Skillnet wish to submit for your consideration materials pertinent to the DRAFT Ireland's Road Haulage Strategy 2022–2033.

CILT Mobility & Supply Chain Skillnet are of the opinion that the role of enterprise-led training via CILT Mobility & Supply Chain Skillnet, Skillnet Ireland and the wider Skillnet Training network is worthy of significant inclusion in the document under section 7.7 Labour Market & Skills.

CILT Mobility & Supply Chain Skillnet is a learning network for enterprises of all sizes within the transport, logistics and supply chain management sectors. We are funded by Skillnet Ireland, who are in turn funded from the National Training Fund through the Department of Further and Higher Education, Research, Innovation and Science. 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. Through their 72 Business Networks in all sectors of the economy and across the country (including CILT Mobility & Supply Chain Skillnet), they currently support over 22,500 businesses nationwide and provide a wide range of valuable learning experiences to over 86,500 trainees in 2021. Their mission is to facilitate increased participation in enterprise training and workforce learning in Ireland.

CILT offers subsidised industry-led training courses to businesses in the Republic of Ireland. CILT Skillnet is the only Skillnet learning network dedicated to supporting these sectors. The objective of this national network is to support the growth of Ireland's transport, logistics and supply chain management sectors by enhancing specialised knowledge and skills, increasing access to skills development opportunities and encouraging ongoing professional development in the sector. During the period 2020 - 2022 the network trained over 4088 individuals across 953 member companies, achieving over 6890 training days on our main TNP programme, vastly exceeding our key performance indicators.

Additionally in the period we have delivered the hugely successful Clear Customs program – training over 732 candidates on customs process and facilitating the smooth transition of 126 Irish companies through Brexit. The program resulted in reduced customs costs, avoidance of delays, survival of many business and the emergence of a number of customs consulting business. This clear customs program also provided the template and expertise for a number of training providers to develop similar customs training now being delivered via other Skillnet Networks. CILT Mobility & Supply Chain Skillnet expect to continue to facilitate training for all levels of competencies in the sector through the next program to at least 2025.

Future Plans: 2023-2025

CILT Mobility & Supply Chain Skillnet will continue to provide network companies with access to the skills needed to grow both their workforce and to keep their company at the forefront of competitive practice in our sector. We will



engage over 450 companies in 2023 and train over 1000 employees via more than 4500 training days, our proposal is to sustain these levels through 2025.

Further, across our different Skillnet programs we will deliver more than 12 non-formal events that will provide expert insight to topics pertinent to our network and we will develop 2 new and innovative programs that enable 20 microcredential courses in supervisory skills for our sector. We will also develop a new module for Commercial Electric Vehicle Maintenance that will enable operators to manage fleets safely and sustainably without their engineers being forced to be brand or type specific by the nature of the currently available training. Finally the development of the Bridging program will enable the standardised recognition of Prior Learning to allow companies unlock the tacit and professional knowledge their employees have and speed up their journey toward current and industry leading new knowledge. All of these new programs will be designed and piloted in 2023 and available for scale in the subsequent years.

CILT look forward to working and engaging with you in this strategy and delivering on its many worth objectives.

Sincerely

James Kearney MSc. CMILT
Network Manager
CILT Mobility & Supply Chain Skillnet

Department of Transport,
Leeson Lane ,
Dublin 2 ,
DO2TR60

24 November 2022

RE: 10 year National Haulage Strategy

To whom it may concern,

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We believe that the strategy is looking at a pilot of longer trailers up to 15.65m.

We believe that the department should now champion and promote the European modular system with weights of up to 60T and 25.25m in length. This system allows for a 54% increase in pallets or equivalent floor space versus 15% with the 15.65m LST.

In addition, the European system is best for fuel efficiency, overcoming the driver shortage and less congestion on the roads. Furthermore, it is a very environmentally friendly system with Co2 savings of 25%.

Yours faithfully,

Trevor Lowey

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Cashel
Clontibret
Co. Monaghan

047 80777

Brendan Meighan (Transport)

From: Transport MinisterNaughton <[REDACTED]>
Sent: Monday 28 November 2022 09:38
To: [REDACTED]
Subject: FW: Road Haulage Strategy
Attachments: evaluation_of_trial_with_europan_modular_system_final_report.pdf; danish designated road map.pdf; designated map road network#.pdf; increased capacity 25.25m trailers.pdf

From: Hildegard Naughton <[REDACTED]>
Sent: Saturday 26 November 2022 09:59
To: Transport MinisterNaughton <[REDACTED]>
Cc: Chris Smith (Transport) <[REDACTED]>
Subject: FW: Road Haulage Strategy

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From: Aidan Kinsella <[REDACTED]>
Sent: Friday 25 November 2022 14:38
To: Hildegard Naughton <[REDACTED]>
Cc: Gavin McSpadden <[REDACTED]>
Subject: Road Haulage Strategy

Good afternoon Minister Naughton,

Firstly, we welcome that you are spearheading a 10-year road haulage strategy for Ireland.

As noted in the draft strategy, and earlier summaries of the findings from the initial consultation, Dennison Trailers have made submissions and we will be making a further submission prior to next week's deadline on the draft strategy.

25.25m European Vehicle Combinations in Ireland

The main issue I wish to raise about the draft strategy is that, in its current form, a major opportunity which was highlighted by the IRHA and ourselves is not being considered. This opportunity is the more extensive use of the European Modular System (EMS) with vehicle combinations up to 25.25m long and at weights up to 60T.

Irish legislation already allows for this combination on the roads albeit at lower weights of up to 44T. In fact, there are at least six 25.25m combinations currently in use on Irish roads and further adoption is only hampered by vagueness around the legal status and ignorance of the law as it currently stands.

The 25.25m combinations that we are aware of have been operational for 7 years. They are used mainly from Cork to Dublin and Limerick to West Dublin.

They have been used without incident.

The average trip is 220km.

The system is used for depot-to-depot transport and in transport hubs for "breaking loads into smaller loads" for onward urban and city distribution. The vehicle combination units already in use in Ireland operate in a very similar way to those in Denmark, in that the system does not have to meet EU turning circle requirements (allowable under

directive 96/53) and can use all existing trailers in an operator's fleet, thereby gaining the maximum use of their fleet and improving tight margins.

In addition, the best comparison for Ireland to look at is Denmark, as a country with similar size, population and road network to us. An important issue here is that they use a non-steer system and do not apply European turning circle requirements as it is used on limited roads only.

By way of note, our knowledge here is quite extensive. Based on information supplied by the Enterprise Ireland office in Copenhagen, in early 2020 723 link system with semi trailers were operational in Denmark, of these 450 approx. were supplied by us from our Naas factory. Other systems operating in Denmark with rigid trucks were in the region of 250.

Game Changer

The European Modular System is a game changer in that it allows for an extra 14 pallets to be carried per single journey, this is a massive 54% increase in capacity in a single journey.

While the draft strategy mentions a trial of the 15.65m longer trailer currently in use in the United Kingdom (and 14.65m). This has had very limited success. It is also limited to 4 extra pallets per journey. This is only a 15% increase.

Most of the UK operators are now seeking the 25.25m European Modular System. The DFT in London have commissioned a detailed feasibility study into an extensive trial of 25.25m combinations. The recommendations from the study have been favourable.

Main European Modular System advantages

The main advantages of the European Modular System are :

The system is very environmentally friendly with a 25% Co2 saving per trip.

It helps alleviate the driver shortage problem.

The system takes up less road space than a normal truck and trailer.

The system does not adversely affect road surface as it adheres to current axle weight distribution.

The system is very safe with data showing they are safer than traditional truck and trailer units.

European Wide Adoption

In addition, the system is now extensively used in many parts of Europe, and we believe the department should be seeking the European wide adoption to allow for the system to cross more than one border. This would significantly help our international haulage operators and improve the environmental footprint of their activities.

Draft Strategy

We would ask that you highlight a system that is currently legal in Ireland but has not been included in the draft strategy and that action point number 10 of the strategy be widened from -

ACTION 10 – Launch a call to the private sector re specific transport operations which may be suitable for a Longer Semi-trailer Trial. Department of Transport, Road Safety Authority and Transport Infrastructure Ireland will review proposed operations and make a recommendation on proceeding with a pilot project, considering infrastructure impacts and road safety. D/Transport, RSA, TII .

to include **a full national introduction of 25.25m vehicle combinations on the designated road network (updated for the M18 Galway to Limerick upgrade and others since 2009) subject to a review with current national operators, manufacturers of the EMS units and relevant authorities.**

Attachments

I am also attaching some documents that you and your officials might find useful when reviewing the above.

I would like to take this opportunity to thank you for reviewing this information. I am happy to answer any questions, you may have.

Thanking you once again.

Regards

AIDAN KINSELLA
Chief Executive Officer

DENNISON



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Email: [REDACTED]

Web: www.dennisontrailers.com

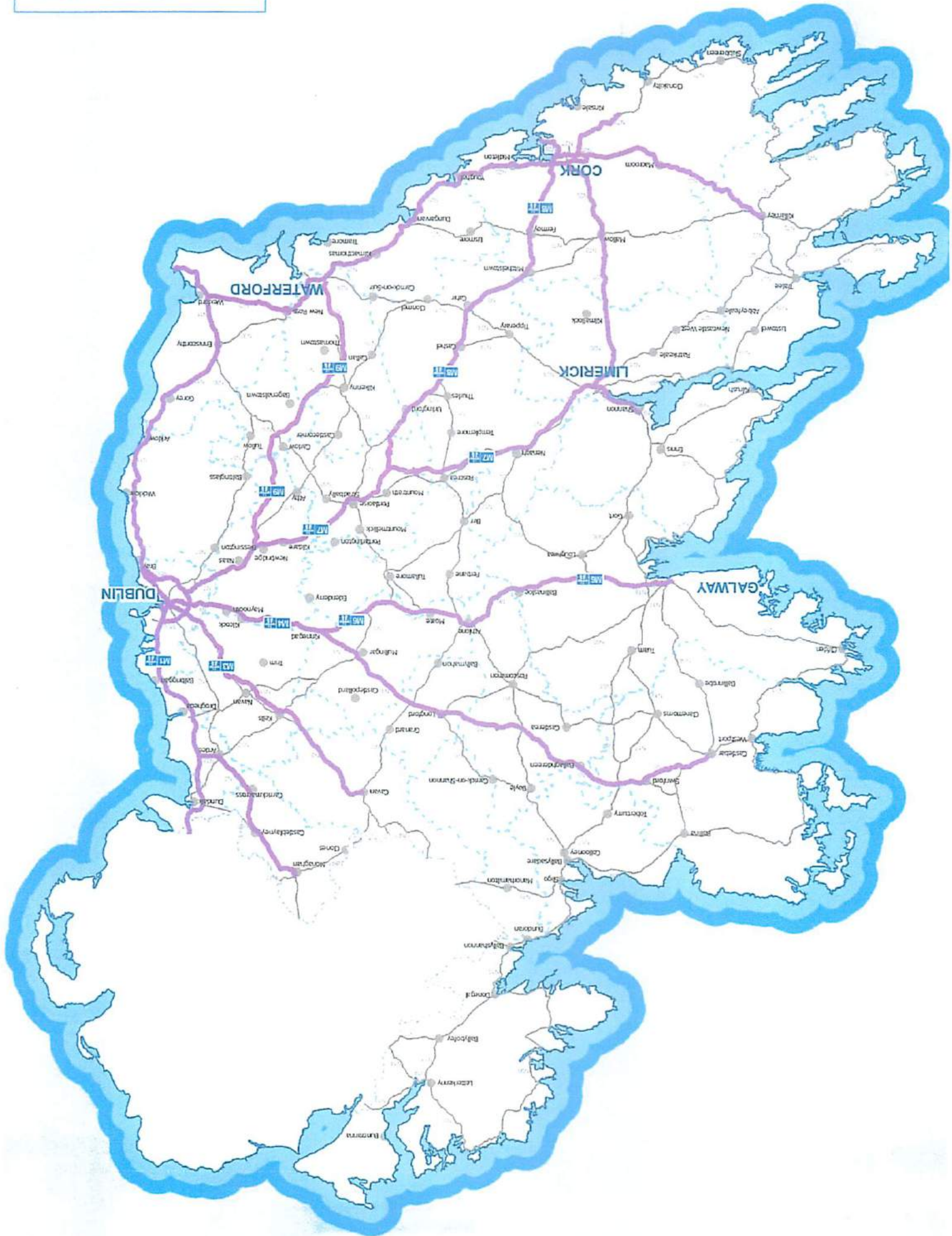
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Naas
Co. Kildare
Co Reg No: 83686

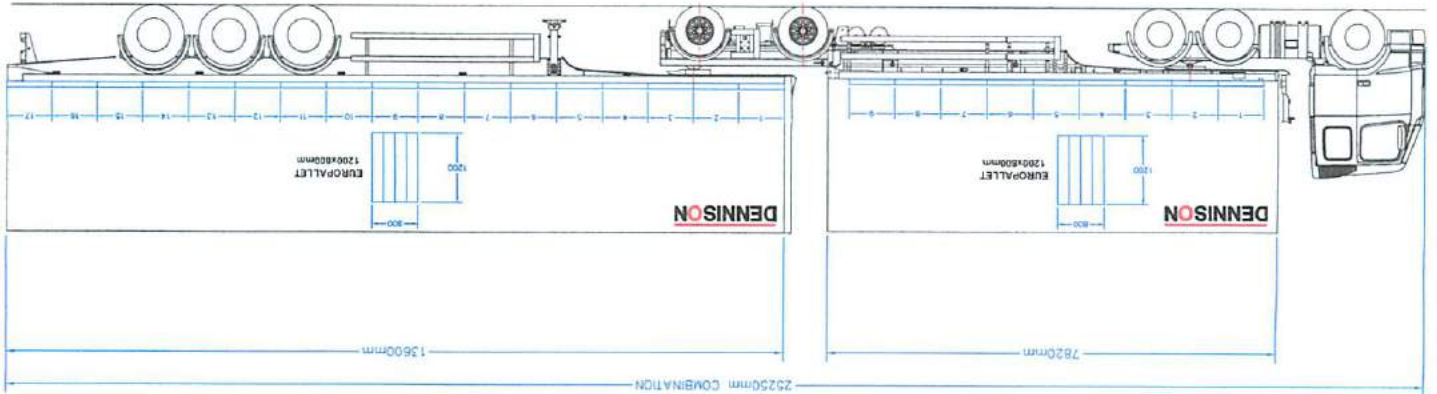
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For more information on Dennison Trailers and our products please log on to www.dennisontrailers.com

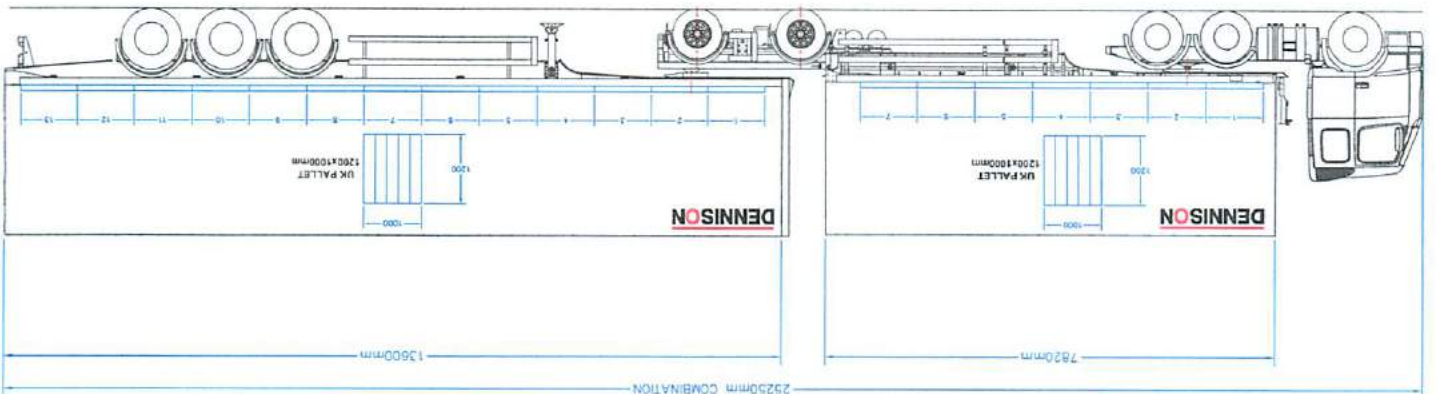
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Designated Roads





(18/34)100 = 53% INCREASE ABOVE STANDARD C'SIDER/BOX VAN 16.5m COMBINATION
 TOTAL = 52 PALLETS
 STANDARD C'SIDER/BOX VAN = 34 PALLETS
 LINK TRAILER = 18 PALLETS
 EURO PALLET 1200x800mm



(14/26)100 = 54% INCREASE ABOVE STANDARD C'SIDER/BOX VAN 16.5m COMBINATION
 TOTAL = 40 PALLETS
 STANDARD C'SIDER/BOX VAN = 26 PALLETS
 LINK TRAILER = 14 PALLETS
 UK PALLET 1200x1000mm

Standardised loading areas

13.6 meter

33 pallets

about 90 kubikmeter

or 2 ISO 20-fots container

or 1 ISO 40-fots container

7.82 meter

19 pallets

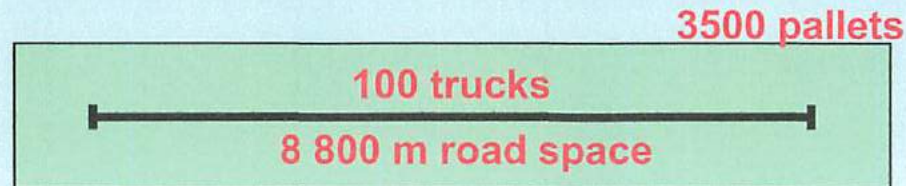
about 50 kubikmeter

or 1 ISO 20-fots container

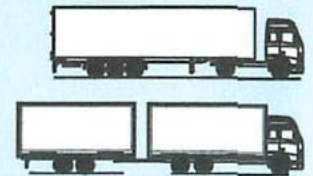
or 1 ISO/CEN swap-body either 7.15 or 7.45 meter

Effects of 38% transport increase (EU White Paper) When looking at the work of 100 trucks today

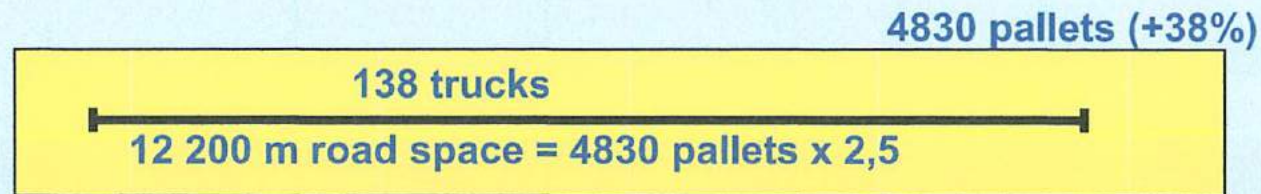
Today



Average
35 pallets/truck



**+ 38% of goods,
Today's trucks**



Average
52 pallets/truck



**+38% of goods,
Modular Concept**



70 m safety distance between trucks

**SUBMISSION ON
ROAD HAULAGE
STRATEGY 2022-2031
BY DENNISON
TRAILERS.**

Response to the Department of Transport

Irelands Haulage Strategy 2022-2031

Draft

Prepared by Aidan Kinsella, Group CEO and David Dennison , Innovation Director.

Dennison Trailers welcomes the Department of Transport's draft Ireland's Road Haulage Strategy 2022-2031; We outline below our responses to some of the key action points and recommendations for additional action points where we believe that opportunities are being missed.

Comments on existing action points in draft strategy.

Core action Points to be addressed.

As in the development of any strategy, some points are core to the development of a good strategy, and some are "non-core" and are ancillary to the overall strategy and policy objectives.

Dennison Trailers believe that the core actions points in the draft document are as follows

25.25m European Modular System and European Wide Promotion of this system.

The action points in the draft Strategy relating to this are as follows

<p>Action 10 Launch a call to the private sector re specific transport operations which may be suitable for a Longer Semi-trailer Trial. Department of Transport, Road Safety Authority and Transport Infrastructure Ireland will review proposed operations and make a recommendation on proceeding with a pilot project, considering infrastructure impacts and road safety.</p>

<p>Action 30 Continue to take an active role in negotiations shaping EU Transport Legislation</p>
--

Dennison Trailers Comments

In the draft strategy various scenarios have been outlined and it would appear as if the department are favouring the adoption of the 15.65m longer semi-trailer as introduced in the UK in recent years with limited adoption by the UK haulage industry. The 15.65m may add some small benefits to some Irish Hauliers but it should be noted that the UK government have commissioned a feasibility study into the introduction of the 25.25 metre EMS system and variants.

UK Looking at 25.25 EMS system Also.

While the feasibility study by WPS on behalf of the DFT in London was limited to a literature review and representative bodies, The study did ask the licensed operators of the LST system of their opinion on the EMS and while the study now recommends a larger sample of hauliers to be questioned, 75% of the users of the 15.65m System said they would adopt the 25.25m system.

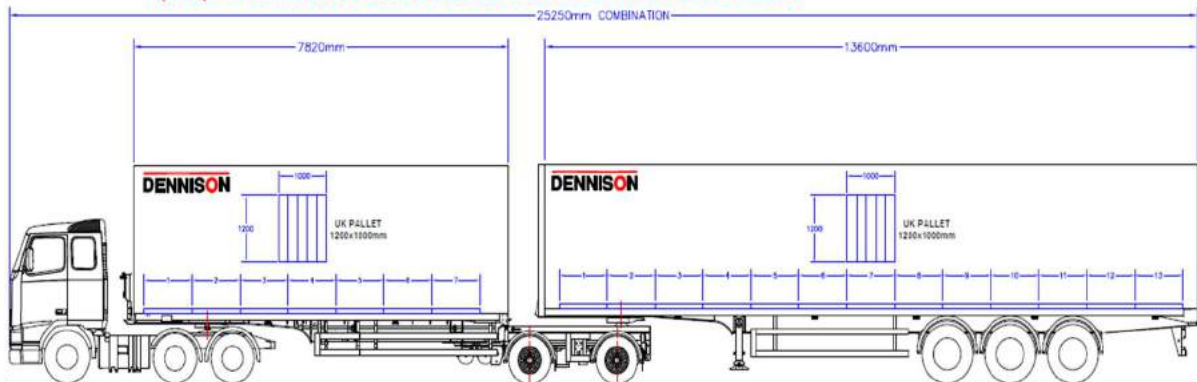
(Source: Page 24 LHV Feasibility Study, August 2022 WSP for DFT).

We would highlight that 7 25.25m European Modular System vehicle combinations are already in use in Ireland.

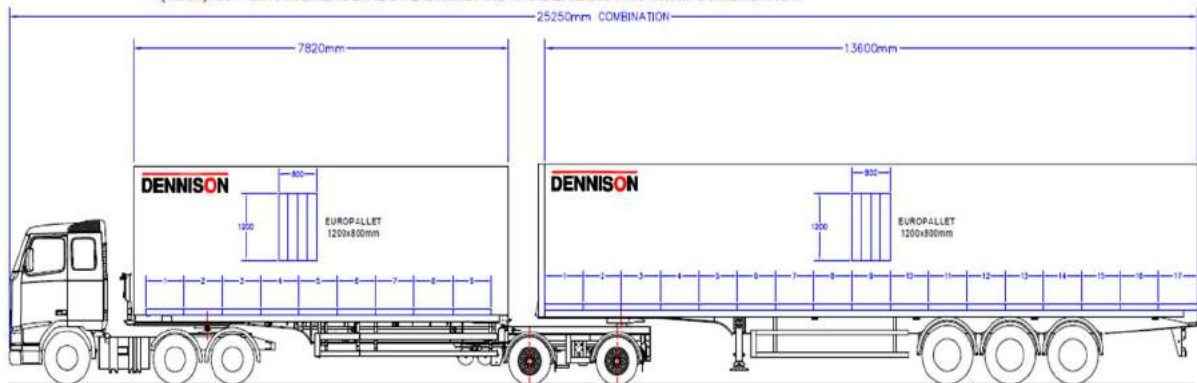
Difference Between LST and EMS

The LST only gives a 15% increase in capacity (4 Pallets) whereas the LHV EMS system gives 54% Extra capacity.

UK PALLET 1200x1000mm
 LINK TRAILER = 14 PALLETS
 STANDARD C'SIDER/BOX VAN = 26 PALLETS
 TOTAL = 40 PALLETS
 (14/26)100 = 54% INCREASE ABOVE STANDARD C'SIDER/BOX VAN 16.5m COMBINATION



EUROPALLET 1200x800mm
 LINK TRAILER = 18 PALLETS
 STANDARD C'SIDER/BOX VAN = 34 PALLETS
 TOTAL = 52 PALLETS
 (18/34)100 = 53% INCREASE ABOVE STANDARD C'SIDER/BOX VAN 16.5m COMBINATION



Irish legislation as transposed from EU directives allow for this.

60 Tonne Limit

Irish legislation should now increase the allowable weight of the 25.25m EMS combination on Irish Roads to 60T. International studies show this accommodate maximum flexibility for all haulage operators and most will operate at weight below this 60T threshold.

Road Network Augmented

This legislation should now be promoted to the haulage sector in Ireland where knowledge of this is Limited and a full-scale promotion of this legislation including updating the designated road network for N18 and other new motorways since 2009 through statutory.

In addition, Ireland as in the Nordics have a very simple registration process for these combinations and this should be retained. This involves both An Garda Siochana and the county councils.

Several haulage firms that see significant benefits to this system, now they have some understanding that it is legal in Ireland and have asked us to give them more information.

We believe that the department should now have a short-term task force to look at how to promote this system and its benefits to the industry. The system was very successful in Denmark from an early stage after initial trials due to a simple registration system that allowed any trailer to be used in combination with the link trailer. Over 9000 trailers were registered within a short period.

See Appendix 1 with further comments on the rationale for using the 25.25 metre EMS system and the benefits of the system.

Action Point Number 30 and review of EC 96/53

Dennison Trailers notes that the EU have carried out a consultation during the summer of 2022 reviewing directive 96/53 and commercial vehicles -weights and dimensions.

The submissions during the consultation to date and follow-on policy formulation have a potential significant impact on Ireland, (North and south) and the operational, cost's structure and environmental issues for our international fleets.

Source: ([Commercial vehicles - weights and dimensions \(evaluation\) \(europa.eu\)](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&plugin=1))

A significant proportion of the responses favour longer vehicle combinations being adopted throughout all member states particularly the 25.25m variant.

Dennison Trailers believe that the 25.25m EMS system should be promoted vigorously by the department at European Level for full adoption throughout all member states. The system is already used in 11 states including Ireland. See appendix 2 -current weights and dimensions consultation.

The 25.25m EMS system can be used for

Containers

Palletised Transport

Refrigerated goods

Liquids

General Haulage

Exports

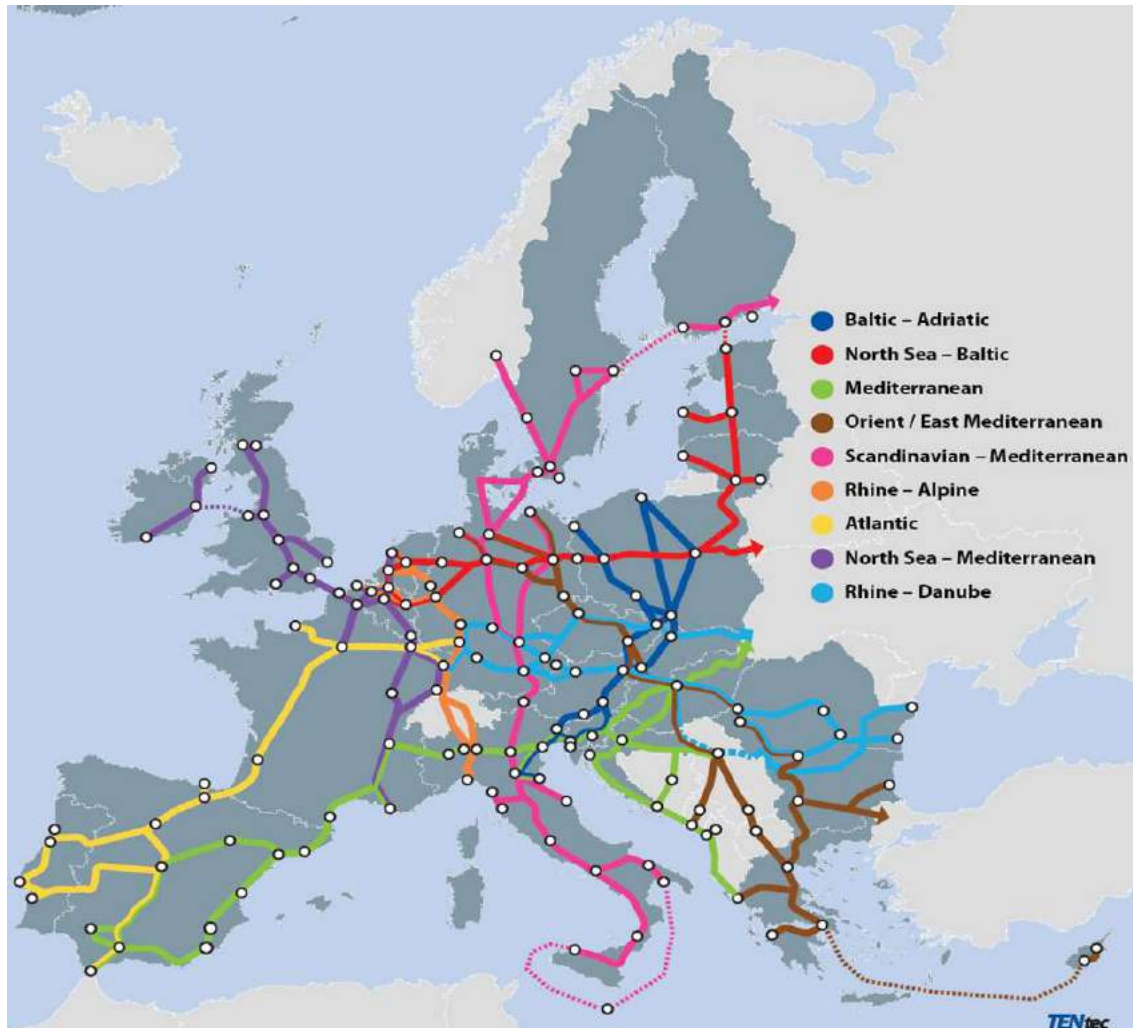
The 25.25m combination if adopted throughout Europe could significantly benefit our indigenous exporting firms. The refrigerated sector would benefit from this and given that 9 of the 10 biggest exports (in the indigenous manufacturing sector) are food related, this could have a significant cost advantage and bolster our "green image" as an island.

Corollary for imports

The reverse is also true for our import capability with the associated environmental, cost and capacity factors for imports coming into the country.

Rail and EMS should Co-exist as they complement each other

Action 25 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



Note: the nine TEN-T core network corridors are based on the CEF and TEN-T Regulations (1316/2013 & 1315/2013); they have been created as a coordination instrument to facilitate the completion of major parts of the core network of strategic importance.
Source: European Commission, Directorate-General for Mobility and Transport, TENtec Information System

The above is representative map of the major urban nodes under the Ten-T intermodal hubs. While Foynes is also under development for intermodal tarin capacity. The cost to develop rail connections throughout the rest of the country could be prohibitive and therefore the 25.25m EMS combination is complimentary to the Ten -T strategy.

Please see earlier submissions on upgrading the designated road network.

New action point needed- Gross Vehicle Weights with Electric and Hydrogen Fuel.

The department need to include an additional action point regarding overall gross vehicle weights of 40t,44t 46t etc. Both electric and hydrogen alternatively fuelled vehicles particularly tractor units will increase in weight by between 1 and 2 tonnes. These savings cannot be achieved by light weighting trailers as only marginal savings will be gained this way. Therefore, the department will need to look increasing the GVW for vehicles using these fuel sources and this should be set out as an action point in its own right.

Summary

Ireland through the Department of Transport should be taking a central role in the development of European Legislation on haulage issues.

As country at the peripheral of Europe, great opportunities are available if the 25.25m system was championed throughout Europe especially given that France is the only country with a sea connection that currently does not operate the system. All others do including Spain. Portugal, Belgium, Netherlands.

It should also be noted that Haulage association in some of the smaller union states like Slovenia also favour the adoption of the EMS.(see appendix 2.)

Given that the UK is not looking at the feasibility of such a system. Irelands need to be at the forefront of championing this.

Appendix 1 - More information on EMS system benefits.

Firstly, we welcome that you are spearheading a 10-year road haulage strategy for Ireland.

As noted in the draft strategy, and earlier summaries of the findings from the initial consultation, Dennison Trailers have made submissions and we will be making a further submission prior to next week's deadline on the draft strategy.

25.25m European Vehicle Combinations in Ireland

The main issue I wish to raise about the draft strategy is that, in its current form, a major opportunity which was highlighted by the IRHA and ourselves is not being considered. This opportunity is the more extensive use of the European Modular System (EMS) with vehicle combinations up to 25.25m long and at weights up to 60T.

Irish legislation already allows for this combination on the roads albeit at lower weights of up to 44T. In fact, there are at least six 25.25m combinations currently in use on Irish roads and further adoption is only hampered by vagueness around the legal status and ignorance of the law as it currently stands.

The 25.25m combinations that we are aware of have been operational for 7 years. They are used mainly from Cork to Dublin and Limerick to West Dublin.

They have been used without incident.

The average trip is 220km.

The system is used for depot-to-depot transport and in transport hubs for "breaking loads into smaller loads" for onward urban and city distribution. The vehicle combination units already in use in Ireland operate in a very similar way to those in Denmark, in that the system does not have to meet EU turning circle requirements (allowable under directive 96/53) and can use all existing trailers in an operator's fleet, thereby gaining the maximum use of their fleet and improving tight margins.

In addition, the best comparison for Ireland to look at is Denmark, as a country with similar size, population and road network to us. An important issue here is that they use a non-steer system and do not apply European turning circle requirements as it is used on limited roads only.

By way of note, our knowledge here is quite extensive. Based on information supplied by the Enterprise Ireland office in Copenhagen, in early 2020 723 link system with semi trailers were operational in Denmark, of these 450 approx. were supplied by us from our Naas factory. Other systems operating in Denmark with rigid trucks were in the region of 250.

Game Changer

The European Modular System is a game changer in that it allows for an extra 14 pallets to be carried per single journey, this is a massive 54% increase in capacity in a single journey.

While the draft strategy mentions a trial of the 15.65m longer trailer currently in use in the United Kingdom (and 14.65m). This has had very limited success. It is also limited to 4 extra pallets per journey. This is only a 15% increase.

Most of the UK operators are now seeking the 25.25m European Modular System. The DFT in London have commissioned a detailed feasibility study into an extensive trial of 25.25m combinations. The recommendations from the study have been favourable.

Main European Modular System advantages

The main advantages of the European Modular System are :

The system is very environmentally friendly with a 25% Co2 saving per trip.

It helps alleviate the driver shortage problem.

The system takes up less road space than a normal truck and trailer.

The system does not adversely affect road surface as it adheres to current axle weight distribution.

The system is very safe with data showing they are safer than traditional truck and trailer units.

European Wide Adoption

In addition, the system is now extensively used in many parts of Europe, and we believe the department should be seeking the European wide adoption to allow for the system to cross more than one border. This would significantly help our international haulage operators and improve the environmental footprint of their activities.

Draft Strategy

We would ask that you highlight a system that is currently legal in Ireland but has not been included in the draft strategy and that action point number 10 of the strategy be widened from -

ACTION 10 - Launch a call to the private sector re specific transport operations which may be suitable for a Longer Semi-trailer Trial. Department of Transport, Road Safety Authority and Transport Infrastructure Ireland will review proposed operations and make a recommendation on proceeding with a pilot project, considering infrastructure impacts and road safety. D/Transport, RSA, TII .

to include a full national introduction of 25.25m vehicle combinations on the designated road network (updated for the M18 Galway to Limerick upgrade and others since 2009) subject to a review with current national operators, manufacturers of the EMS units and relevant

Danish report on EMS added as a PDF also.

Law

Commercial vehicles – weights and dimensions (evaluation)

About this consultation

Consultation period

26 April 2022 - 19 July 2022 (midnight Brussels time)

Topic

Transport

Target audience

The Commission is inviting the general public and stakeholders to express their opinion and share information on the impact of the existing directive as well as on possible additional policy measures for its revision.

This consultation specifically invites first-hand experience from the following groups and individuals:

Heavy-duty vehicle and original equipment manufacturers, developers of zero-emission and energy reduction technologies, transport operators, intermodal terminal managers, shippers, wagon suppliers, heavy-duty vehicle drivers, civil engineering organisations, road infrastructure managers, environmental associations, road safety associations, national competent authorities, road users associations, etc.

Why we are consulting

To reach the full potential of the single market and to reduce transport greenhouse emissions, it might be necessary to revise of the weights and dimensions directive.

This will help deliver the European Green Deal and will be a crucial element of the implementation of the Sustainable and Smart Mobility Strategy.

This consultation will gather views and evidence about the potential impact (positive and negative) of the possible measures and policy options.

Responding to the questionnaire

The response period for this consultation has ended. The questionnaire is no longer available. You can track further progress of this initiative by subscribing to receive notifications.

Consultation outcome

Further information on this consultation is provided below.
Follow developments to this initiative by subscribing to receive notifications.

Contributions to the consultation

Contributions

(259.7 KB - ZIP)

Download 

Documents annexed to contributions

(11.1 MB - ZIP)

Statistics

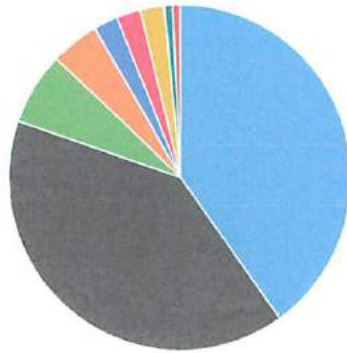
Total of valid feedback instances received: 132



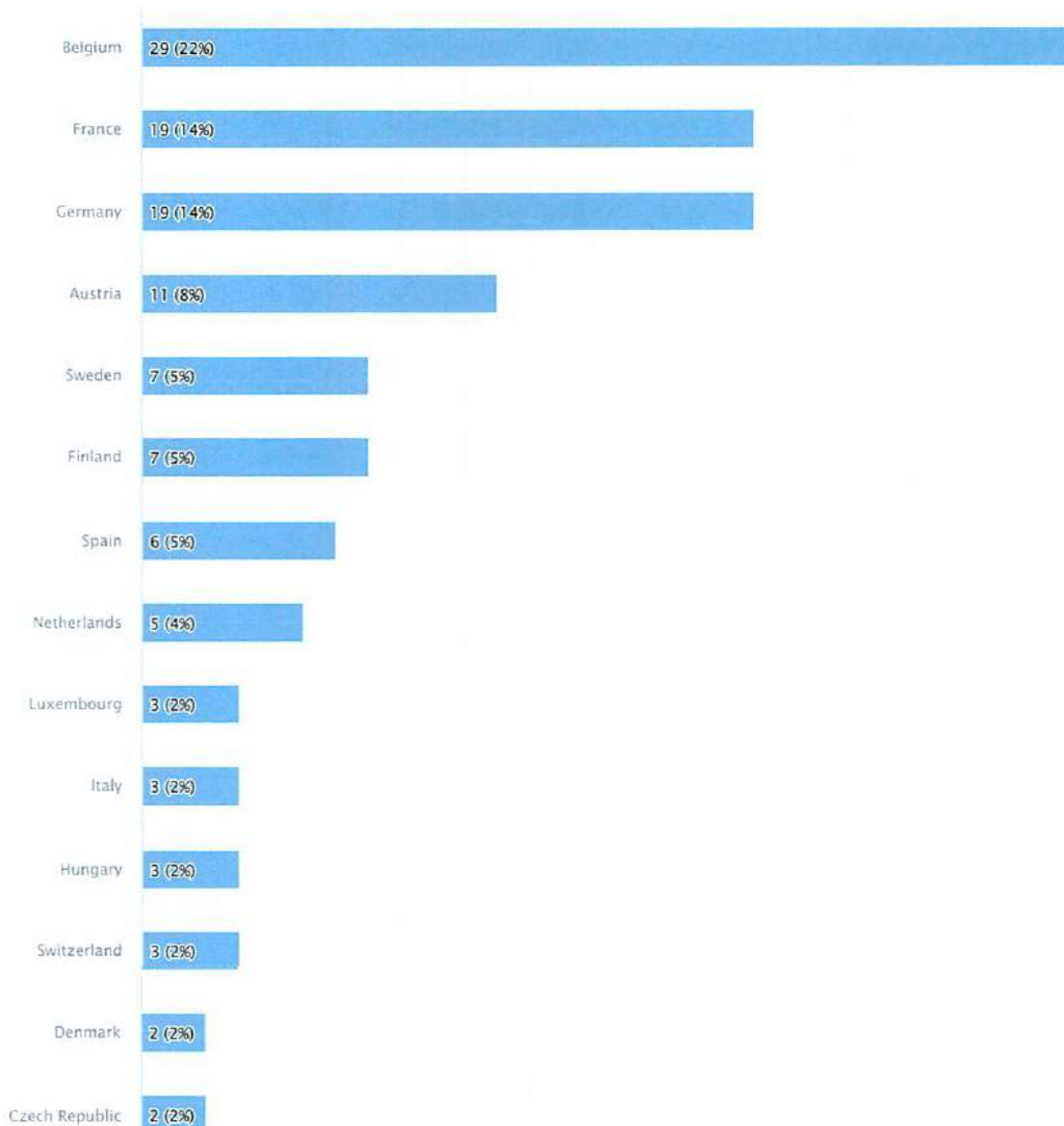
The number feedback instances shown includes only the valid ones, respecting the feedback rules. The data is regularly updated.

By category of respondent

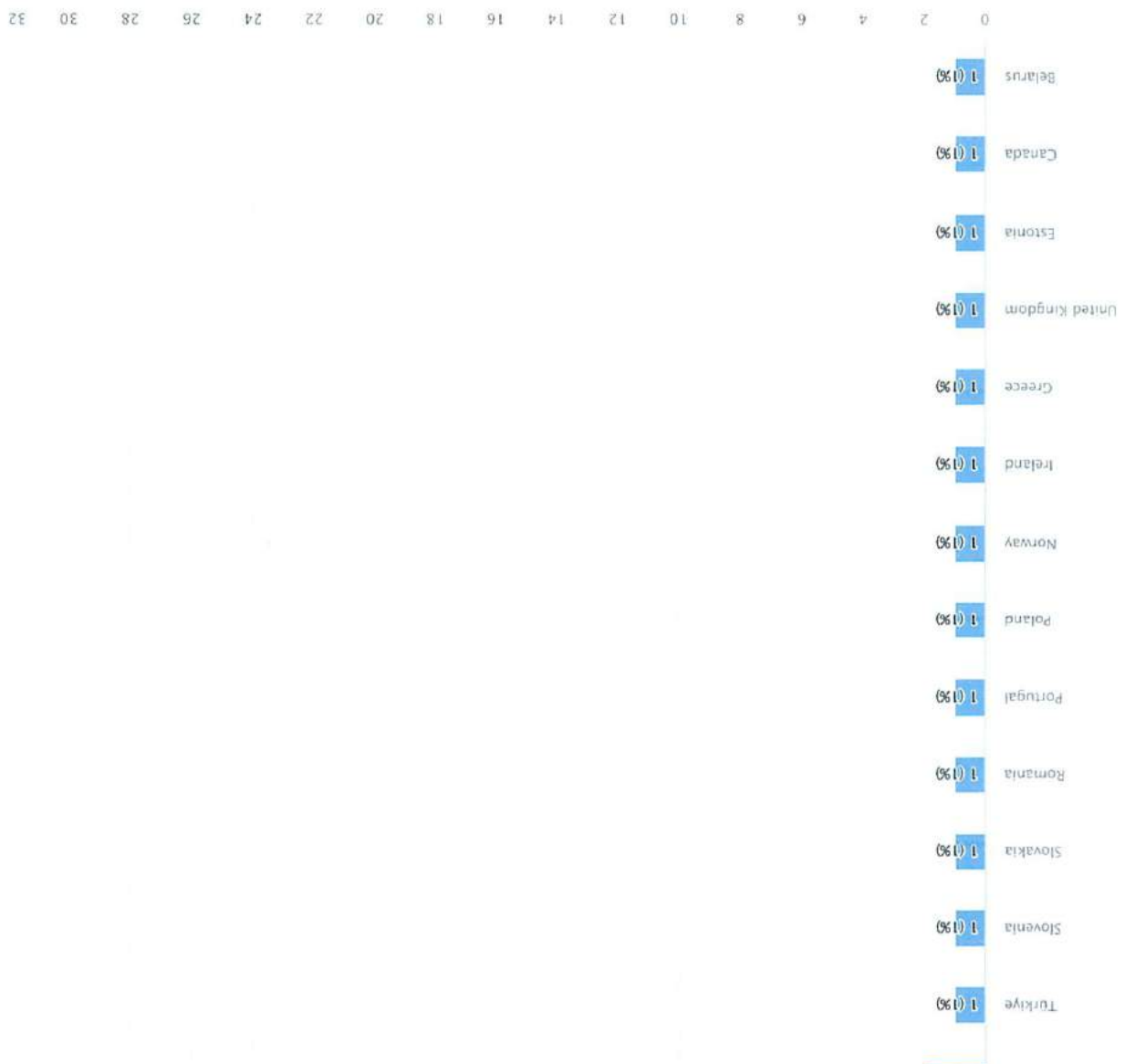
- Company/business: 53 (40.15%)
- Business association: 53 (40.15%)
- Public authority: 9 (6.82%)
- Other: 6 (4.55%)
- Trade union: 3 (2.27%)
- Non-governmental organisation (NGO): 3 (2.27%)
- EU citizen: 3 (2.27%)
- Non-EU citizen: 1 (0.76%)
- Consumer organisation: 1 (0.76%)



By country



Contact



July 2022

Chamber of Commerce and Industry of Slovenia Transport Association

Comment on the open public consultation on revising Directive 96/53/EC on weights and dimensions of heavy-duty vehicles

We are calling for:

- increasing the current 40-tonne weight limitation for border crossings to 44 tonnes and the maximum weight of lorries taking part in intermodal/combined transport operations to 46 tonnes.
- maintaining the possibility to authorise cross-border transport operations with heavier/longer vehicles between the bordering Member States that allow their circulation in national traffic
- authorising the use of European Modular system (EMS) vehicles in the EU as a general rule, at least along the TEN-T core and comprehensive network.
- extending the scope of the Directive to exceptional transport as this type of transport would benefit from harmonisation of legislation and rules.

17 February 2022, Brussels

Commercial vehicles – weights and dimensions EU Commission evaluation

Weight & dimensions' limits: let's make the best use of Europe's roads!

Under current EU rules, commercial vehicles in the EU carrying goods or passengers by road must meet the allowable weights and dimensions. The EU Commission launched an initiative to evaluate if the rules a) ensure the smooth functioning of the single market and b) improve the environmental performance of these vehicles while safeguarding road safety. Based on these findings, the Commission will assess options to address any identified regulatory and market failures.

Current and future challenges related to transport need to be addressed to secure long-term competitiveness and sustainability

The transport system is critical to European businesses, including the pulp and paper industry, and global supply chains. At the same time, transport emissions represent around 25% of the EU's total greenhouse gas emissions (GHG), and these emissions have increased over recent years. The EU Commission is aiming at achieving a 90% reduction in transport-related greenhouse gas emissions by 2050.

The main challenges to be faced by road transport relate to increasing costs, the shortage of drivers across Europe, the growing level of road congestion and the rising level of GHG emissions.

Road transport costs have grown over the years because of rising fuel price, road charging and truck drivers working regulations and increasing wages. This impacts the price of raw materials and goods and consequently the overall competitiveness of the industry.

Further cost increases are expected in the coming years due to further internalisation of external costs - to meet stricter emission targets, rising road charging and stricter minimum safety standards. Although road cannot carry everything, the ability of rail and other modes of transport to help overcome these challenges remains very limited. There is often no affordable and efficient alternative to roads unfortunately.

Competitiveness and sustainability should be the key objectives when considering the review of the weight and dimensions rules enforced in the EU¹. It should aim at higher efficiency of the road transport to the benefit of the industry and the whole society by keeping our economy moving and enhancing the functioning of the internal market.

Road: the predominant mode of transport for freight today and tomorrow

Trucks dominate inland EU freight transport² with a 73% share of the tonne-kilometres and heavy-duty trucks (together with buses) account for 19% of the EU total road transport-related emissions³.

¹ Set in the 96/53/EC Directive.

² According to European Commission, Directorate-General for Mobility and Transport, EU transport in figures : statistical pocketbook 2021, Publications Office, 2021, <https://data.europa.eu/doi/10.2832/733836>. The share of intra-EU freight transport is 45.3% for trucks 36.8% for seagoing ships, 11.0% for rail and 3.7% for inland waterways. Road accounts for 73.2% of the EU27 of inland freight transport in billion tonne-km, rail 16.9%, inland waterways 5.8% and pipelines 4.2%.

Road transport is, in general, the most flexible and efficient mode of transport when considering short distances and, for sure, the last miles. This is the only mode of transport that can ensure door-to-door delivery of goods to customers.

The European paper industry makes use of the three basic modes - rail, road and water, but like many industry sectors, road is the main mode of transport for European distribution. Despite some efforts to rely more on rail, road transport is expected to remain dominant mode of transport in the future. A vast majority of the yearly 275 million tonnes of the paper industry raw materials and finished products is indeed transported by road in Europe.

Significant efficiency gains are possible and can deliver competitiveness and sustainability for road transport for shippers and the EU economy

Urgent action is needed to make road transport more resource-efficient and to further integrate the various transport modes to achieve a true Single European Transport Area. Financial support to intermodal transport platforms and other equivalent infrastructures should be encouraged. Road should have its efficiency pushed to the optimum to deliver its full potential in a sustainable way, i.e. by reducing its GHG emissions and without neglecting road's safety and security. All opportunities to reduce GHG emissions must therefore be considered.

Smart innovations to improve aerodynamics and reduce fossil fuel consumption and derogations to allow their implementation are a step in the right direction. They can have a great impact on competitiveness and sustainability and should therefore be promoted and incentivised, to contribute to the EU Green Deal and the success of an ambitious industrial policy. Innovations like electric vehicles, hydrogen and other propulsion systems should be promoted.

However, increasing incrementally the weight and dimensions' limits and payload of trucks in legislation is one of the most cost-efficient and sustainable solutions, which would benefit to the paper industry and other industry sectors. It would save millions of truck journeys and result in a significant amount of CO₂-Emissions reduction.

Trucks weight and dimensions' limits are one of the main bottlenecks that need to be addressed. 44 tonnes should be considered as a minimum weight limit in all EU Member States

For international transport, Directive 96/53/EC sets limits to vehicles engaged in international transport to 40 tonnes and 18.75 meter of length, with the exception of intermodal transport where a maximum of 44 tonnes is permitted in a range of 150 km. However, individual Member States can allow higher weight limits on their roads and allow border crossing as a bilateral agreement between two member states.

The paper industry sector, like chemicals, steel, building, wood and petroleum is affected by weight restrictions because it transports mainly heavy goods. However, dimension restrictions hit also some segments of the paper industry that require high volumes.

Some countries like Germany, Poland and Slovakia apply a 40 tonnes limit for road transport and 44 tonnes limit for intermodal transport. However, many other EU countries have allowed 44 tonnes for all transports - Belgium, France, Italy, and Luxemburg on 5 axles. Even higher weight limits prevail with 48 tonnes in Czech Republic, 50 tonnes in the Netherlands, 60 tonnes in Portugal and even 74 tonnes in Sweden and 76 tonnes in Finland on 25.25-meter-long lorries. Finland also allows as long lorries as 34.5-meter in January 2019. Several years of experience with heavier vehicles on relevant roads in those countries has not revealed any particular safety issues or infrastructure problems. In Sweden, it has been calculated that the road safety has increased since there are fewer lorries needed to transport the same amount of goods.

Allowing longer trucks and trucks able to carry heavier payloads is crucial. Increasing the authorised maximum weight with a harmonised minimum limit of 44 tonnes would result in a decrease of the number of trucks on the road and road freight journeys, while addressing drivers' shortages. It would reduce congestion on European roads and

³ <https://op.europa.eu/en/publication-detail/-/publication/14d7e768-1b50-11ec-b4fe-01aa75ed71a1>

transport costs, give a boost to European industry's competitiveness; and, as important, reduce fuel consumption and GHG emissions.

By increasing the weights permitted in normal traffic from today's 40 tonnes to the level of 44 tonnes permitted in combined transport, the possible payload would ideally increase from approx. 26 to 28 tonnes to approx. 30 to 32 tonnes. In this way, every seventh transport could be saved in many industries (including agriculture and forestry, chemicals, stones/earths, metals, paper). When transporting heavy individual pieces, the efficiency gain can be much higher. CO₂ emissions from road freight transport could thus be reduced by an estimated 2 to 3% in the short term.

Increasing the minimum weight limit from 40 to 44 tonnes in all EU Member states would absolutely not lead to any modal shift from rail or intermodal to road. Paper industry and many other industries already use rail or intermodal transport whenever possible.

European Modular System (EMS): let subsidiarity and innovation prevail!

The use of EMS should be promoted for relevant infrastructure. It can significantly help accommodate the growth of needed road transport volume by delivering additional loading capacity, higher resource efficiency and fewer trips without increasing risks of accidents, more wear and tear on roads and without major investment in infrastructure. All this has been proven in trials in, amongst other countries, Denmark, Norway and the Netherlands, and where the full operation of such modular combinations is already permitted, such as in Sweden and Finland.

Cepi, like many other European and national trade organisations supports the EMS. The EMS is a concept that allows combinations of existing loading units (vehicles and load modules) into longer and sometime heavier vehicle combinations to be used on some parts of the road network, but obviously not in city centres or any other sensitive areas. Indeed, based on standard modules, it gives high flexibility to operators to adapt the vehicles to different situations, offers the possibility to use long combinations when possible and shorter combinations when necessary, and favours co-modality. As it is based on existing equipment, it is easy to implement and very easy to rearrange to shorter combinations and adapt to local conditions. All the modules of EMS should be allowed in all combinations.

EMS already operates in several Member States under certain circumstances and conditions and offers industry a much-needed efficiency and a greener alternative to many other current logistics solutions. EMS favours the development of intermodal transport and co-modality and supports the development of other transport modes like rail since it is built on using standard ISO 20 and 40 feet containers common also to rail and maritime freight transport. Allowing longer trucks on the roads would not shift substantial volumes of loads from rail to road as goods transported by road tend to be higher value goods, whilst rail is more suited to lower value goods. Road and rail are indeed complementary modes with limited areas of competition. Until now use of longer and heavier vehicles have been quite successful. Even in densely populated areas like the Netherlands the combinations have proved to be completely safe. Drivers were undergoing an additional training and as a result the percentages of accidents was lower than for conventional trucks.

Cross-border trips with higher capacity trucks and EMS should be allowed and only subject to agreement between the concerned Member States.

Directive 96/53/EC sets rules limiting weight for transport in cross-border traffic, with a maximum of 40 tonnes. This directive no longer allows Member States to conclude a bilateral agreement authorising transport of up to 44 tonnes in cross-border traffic, calling into question the principle of subsidiarity, which could authorise the cross-border circulation of transport vehicles of more than 40 tonnes, provided that the technical specifications of each of the Member States are met (in the absence of an express ban by one of the two Member States).

A clear regulation on border crossing is still lacking in the EU. EU rules should enable higher weight limits for cross-border trips⁴. Single compartment articulated vehicles with a minimum limit of 44 tonnes for road transport (on 5 axles) and 50 tonnes (on 6 axles) for intermodal operations across Europe should be allowed for instance. Cross-

⁴ The interpretation of former Commissioner Kallas' letter is restricting too much cross-border trips.

border trips with even higher capacity trucks between two or more neighbouring countries that have the same limits should also be allowed.

Border crossings of more than two Member States should be allowed with higher weight and larger dimensions as long as the lorries are allowed in the specific countries and there is no discrimination according to nationality of the registered vehicle. Industry is indeed often impacted by the lowest authorised vehicle weight limit on the route, which leads some time to absurd situations. Belgium has a maximum authorised weight of 44 tonnes for five-axle road haulage combinations like France⁵, but because of the EU Directive, at the border, the weight of the vehicle must be reduced to 40 tonnes.

Besides, as the Benelux is governed by a specific treaty, transport is treated as national transport and Member States within this region have been able to conclude bilateral agreements between themselves allowing the cross-border circulation of 44-tonne heavy goods vehicles.

With the European Directive, Member States cannot set cross-border transport conditions similar to those in the Benelux, thus introducing a distortion of competition between the Benelux and other Member States.

Low weight limits lead to additional costs and hinder smooth transport of goods throughout the EU and constitute an obstacle to the well-functioning and the completion of the Single Market. Permitting international transport with higher load deliveries across the EU and discouraging any cross-border barriers that limit its benefits would result in savings for all economic operators and would have a positive impact on energy consumption and the environment.

Cross-border use with EMS vehicles and other kinds of longer and heavier vehicles⁶ would help at-source greening road transport, steering combined transport and further supporting an efficient EU transport network involving all modes of transport, including road. The creation of specific corridors for bigger trucks between Member States should be also encouraged.

* * *

Cepi is the European association representing the paper industry. We offer a wide range of renewable and recyclable wood-based fibre solutions to EU citizens: from packaging to textile, hygiene and tissue products, printing and graphic papers as well as speciality papers, but also bio-chemicals for food and pharmaceuticals, bio-composites and bioenergy. We are a responsible industry: 92% of our raw materials are sourced in Europe and certified as sustainable, 91% of the water we use is returned in good condition to the environment. We are the world champion in recycling at the rate of 73.9%. At the forefront of the decarbonisation and industrial transformation of our economy, we embrace digitalisation and bring 20 billion value addition to the European economy and €5.5 billion investments annually. Through its 18 national associations, Cepi gathers 500 companies operating 895 mills across Europe and directly employing more than 180,000 people.

⁵ Since 1 January 2013, France has increased the statutory limit to 44 tonnes for transport within the French territory. Before 1 January 2013 the limit - with a few exceptions - was 40 tonnes.

⁶ The duo-trailers with 31,7 meters and 70 tonnes total weight, which is in use in specific routes in Spain for instance.



Eco-trucks



The fastest and most cost-effective practical way to decarbonise road goods transport on a global scale.

Greening road transport

Governments have set ambitious goals for carbon neutrality to halt global warming. The road transport industry is committed to playing its role in reaching these goals by significantly reducing its carbon footprint.

IRU and its members have a clear vision for decarbonising commercial road transport by 2050 with a range of short and long-term actions. One of the short-term “quick wins” that could be implemented now is to encourage and harmonise the use of Eco-trucks domestically and for cross-border services to significantly reduce CO₂ emissions.

Eco-trucks – which carry larger loads than standard truck combinations – are already in use or are being tested successfully and reduce CO₂ emissions in 18 countries around the world. Yet their use is hampered elsewhere. Cross-border operations with Eco-trucks remain rare.

With increased trade, the diversification of supply chains and economic progress more important than ever amidst the pandemic, the volume of goods transported by road is expected to triple by 2050.¹

We can reduce CO₂ emissions considerably and keep road transport moving forward if governments act now to support the wider deployment of Eco-trucks.

1. ITF Transport Outlook 2019

Decarbonising road transport

Depending on the vehicle combination, Eco-trucks can reduce overall fuel consumption, and therefore CO₂ emissions, by up to 35%. Replacing with Eco-trucks just 30% of the existing commercial vehicles worldwide that

are primarily used for regional and long-haul operations would lead to an immediate emissions reduction of 237 million tonnes of CO₂.

Number of vehicles, road space, fuel and CO₂ emissions for a 200-pallet load

76-90 tonnes



60 tonnes



40 tonnes



26 tonnes



18 tonnes



12 tonnes



3.5 tonnes



Economic and ecological, now and into the future

Eco-trucks are cost-effective. Moving greater volumes with fewer operational resources, they are more efficient than standard trucks.

With demand for logistics services on the rise, Eco-trucks are an economic and ecological solution for now and for well into the coming decades. The emissions reductions related to Eco-trucks will mitigate the forecasted increase in goods transport demand and the related emissions through to 2050.

Without Eco-trucks, road goods transport emissions would triple by 2050, impacted 1:1 as road goods transport demand increases. With the introduction of Eco-trucks, this increase could be significantly mitigated. A 30% market penetration of Eco-trucks would lead to an annual emissions reduction of more than 700 million tonnes of CO₂ by 2050.

Boosting safety, easing congestion and addressing driver shortage

The volumes transported by three regular trucks can be transported by two Eco-trucks, reducing the total number of vehicles on the road. This will ease congestion and help to solve the long-term global driver shortage, as fewer professional drivers will be needed.

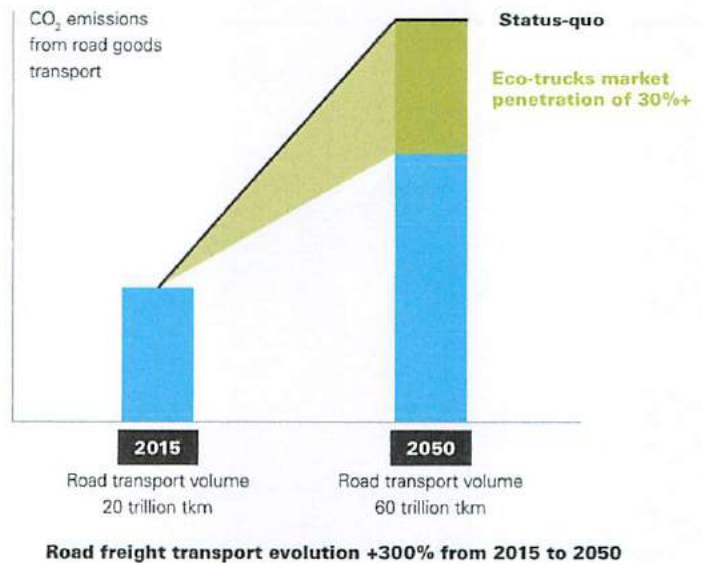
Accident statistics from countries where Eco-trucks are already in use show that their safety performance at least matches that of standard vehicle combinations, partly because they are better equipped with the latest Advanced Driver Assistance Systems, which help to avoid accidents caused by human error, and because they reduce the number of vehicles on the road, decreasing the likelihood of accidents.²

Green and efficient multimodal operations

Eco-trucks make the transfer of swap bodies and containers from one transport mode to another more efficient, sustainable and cost effective.



Using 30% Eco-trucks will lead to more than 700 million t CO₂ savings in 2050



The load capacity of non-road modes of transport, including air, rail and maritime, has dramatically increased in recent years. Trains are longer and planes and ships are bigger, but the capacity of truck combinations has not increased at all.

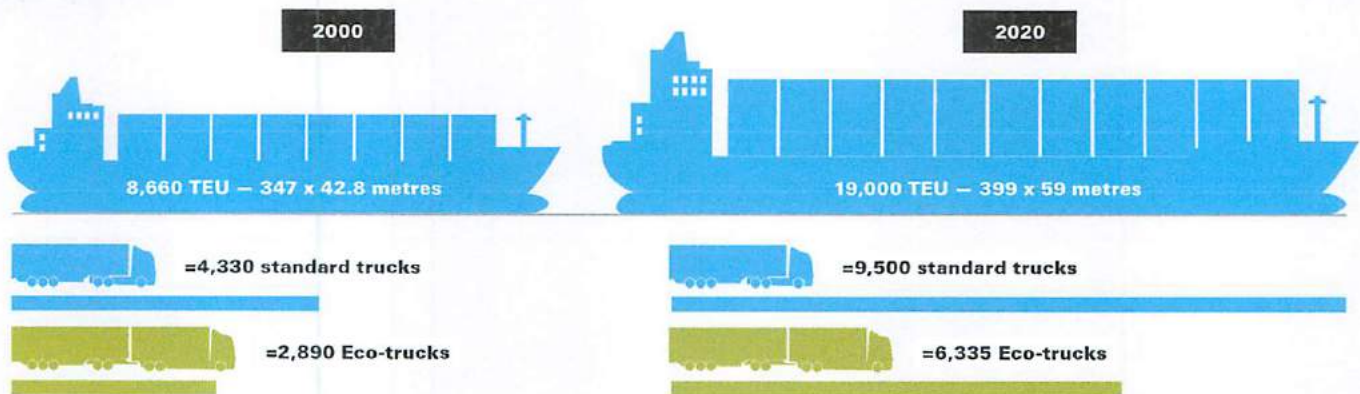
Capacity increases in non-road modes considerably increase the number of trucks required for complementary journeys in multimodal transport. Eco-trucks will

reduce the number of trucks needed for such operations by at least one third.

In addition, the cost per kilometre of using an Eco-truck is on average 33% lower than for a regular truck.³

2. Statistics from Australia, Canada, Denmark, Germany, the Netherlands and Sweden. ITF, 2019.
 3. Lindqvist, D., Salman, M. & Bergqvist, R.: A cost benefit model for high capacity transport in a comprehensive line-haul network. Eur. Transp. Res. Rev. 12, 60 (2020), Springer.

Containerships

**Challenges**

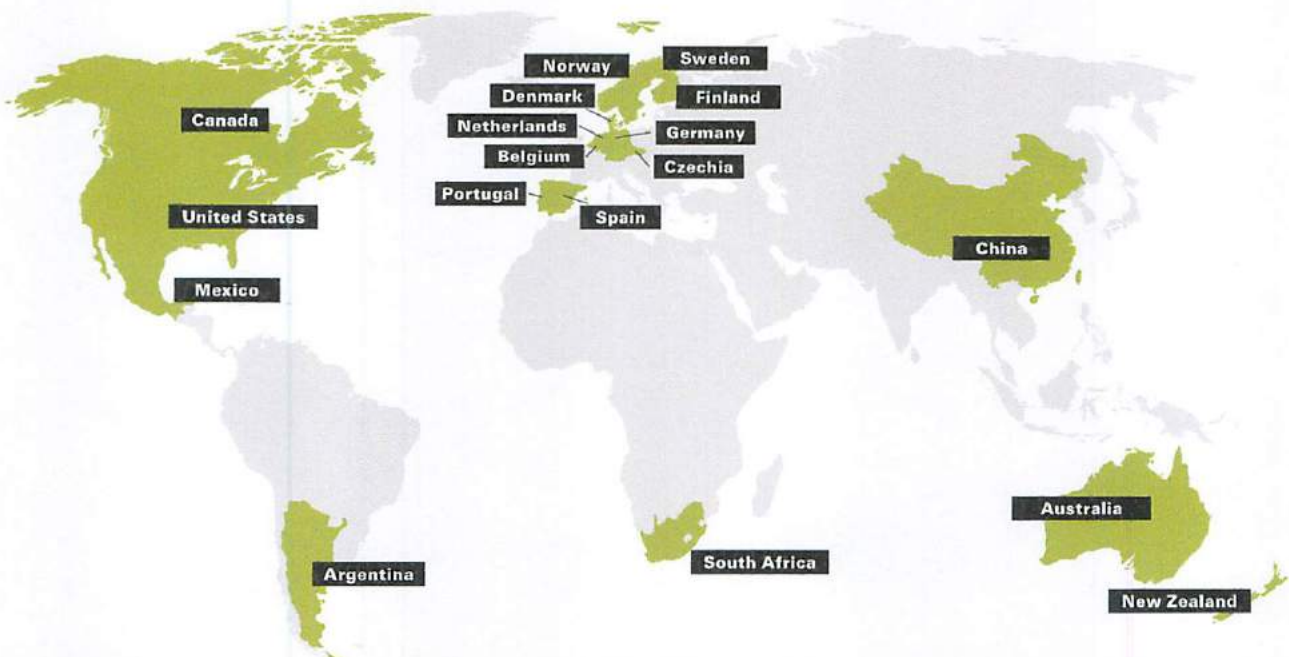
While governments have amended regulations to allow for larger planes, ships and trains, weights and dimensions legislation for heavy goods vehicles has remained largely unchanged. Therefore, the number of trucks needed for first and last mileage of a multimodal transport operation increases

disproportionately, which can be largely mitigated by using more Eco-trucks.

Currently, only 18 countries allow the use of Eco-trucks or have undertaken trials. All report positive experiences and there are no plans to reverse regulations or stop trials.

Eco-trucks are useful for international as well as domestic operations. Regulations at a regional or global level are needed to enable their trial or operation across borders, further reducing CO₂ emissions and enhancing transport efficiency.

Countries using Eco-trucks



What needs to be done?

With the use of more Eco-trucks, decarbonisation in the road goods transport sector can be considerably accelerated. IRU is calling on governments to unlock the economic and environmental benefits of Eco-trucks by:

1. Updating, harmonising and standardising legislation on weights and dimensions to permit their use in national and international transport.
2. Initiating and, where already existing, scaling up national and cross-border operations.
3. Providing financial and political incentives for investment in and the use of Eco-trucks.

Brendan Meighan (Transport)

From: William Duffy <[REDACTED]>
Sent: Monday 28 November 2022 15:54
To: Transport haulagestrategy
Subject: 10 year road haulage strategy

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Department of Transport,
Leeson Lane ,
Dublin 2 ,
DO2TR60

28th November 2022

RE: 10 year National Haulage Strategy

To whom it may concern,

We understand that a 10 year road haulage strategy is in preparation by the department.

We believe that the strategy is looking at a pilot of longer trailers up to 15.65m.

We believe that the department should now champion and promote the European modular system with weights of up to 60T and 25.25m in length. This system allows for a 54% increase in pallets or equivalent floor space versus 15% with the 15.65m LST.

In addition, the European system is best for fuel efficiency, overcoming the driver shortage and less congestion on the roads. Furthermore, it is a very environmentally friendly system with Co2 savings of 25%.

Yours faithfully,

William Duffy
Transport Manager-Director



Cottage Farm Newtowncunningham Lifford Co Donegal F93 FW71

Office 00353 74 91 56333 Ext 211

Mobile [REDACTED]

Brendan Meighan (Transport)

From: Eoin Gavin <[REDACTED]>
Sent: Tuesday 29 November 2022 21:24
To: Transport haulagestrategy
Subject: RE: 10 Year National Haulage Strategy

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Department of Transport,
Leeson Lane,
Dublin 2,
DO2 TR60

To whom it may concern,

I wish to contribute to the 10 year road haulage strategy that is in preparation by the department.

The most sustainable new development in European road transport has been the European Modular System. The European Modular System with gross weights of up to 60T and 25.25m in length. This system allows for a 54% increase in pallet capacity. It is the use of a short trailer 7 metre trailer or rigid and dolly attached to a standard 13.6 trailer .

The system has been trialed all over Europe and it is the most sustainable while still using the current fleet of trucks and trailers .

In addition, the European system is best for fuel efficiency, overcoming the driver shortage and less congestion on the roads. Furthermore, it is a very environmentally friendly system with Co2 savings of 25%.

See attached a system built in Ireland by Dennison Trailers .

Yours faithfully,

Eoin Gavin

Regards
Eoin Gavin

Eoin Gavin Transport Ltd.,
Woodpark,
Bunratty,
Co. Clare,
Ireland.

Tel: ++ [353 61 713486](tel:35361713486)

Fax: ++ [353 61 713485](tel:35361713485)

Mobile: [REDACTED]

Website: www.eoingavintransport.com



November 2022

FTA Ireland made a comprehensive submission to the initial consultation in July 2021. We welcome progress on the development of the first road haulage strategy for Ireland and again highlight that the terms of this strategy should be extended beyond haulage to include the own account sector as well as shipping companies, and consignors of haulage services. Haulage in itself is one link within the supply chain. A modern and efficient supply chain is reliant on all links working in tandem and requires mutual recognition and respect to deliver efficient and safe logistical solutions.

FTA Ireland commend the Department of Transport on the [draft] haulage strategy 2022-2031 and recognise that it is a substantial project. There is ambition within the draft that is tainted somewhat by trying to focus more on the integration of political policy rather than on industry priorities. (The sustainability & decarbonisation section of the report is a good example of this).

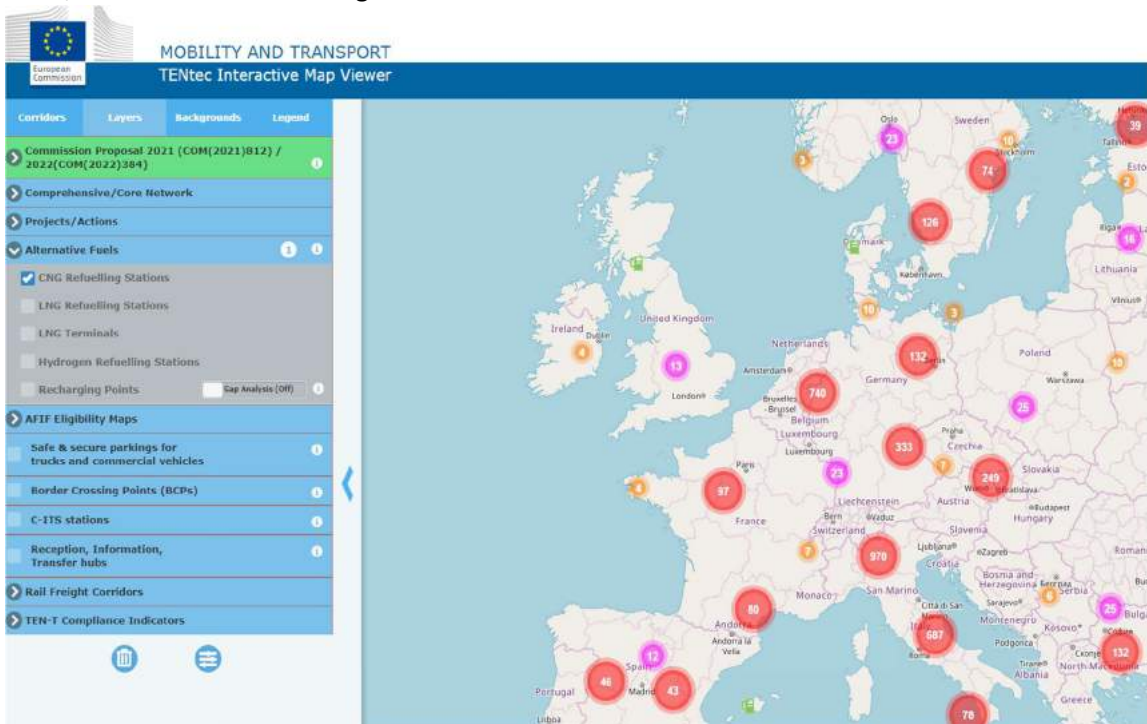
When compared with our submission we are happy to see over 20 of the 33 actions in the draft match suggestions included in the FTA Ireland submission in July 2021. Our submission included many more recommendations; however, we are encouraged by the establishment of a 'Road Freight Forum that will develop clearer communications and more collaborative policy development. Having this structure in place will assist industry and stakeholders ensure that the work started here will be developed and delivered over the coming years. This engagement is very important in supporting a flexible strategy move with the changing political and working environments in which we operate and will assist in keeping the strategy relevant.

It is important that in the final iteration of the strategy that detailed timelines are allocated to short medium and long term actions.

FTA Ireland Observations for consideration on the draft published Haulage Strategy 2022-2031

- A lot of actions centre around commissioning of studies, and further review of data sets. We need to be careful that ambition is not presented as passing the book to outside consultants. It is important that
 - There is a timeline for delivery of these studies
 - The studies are presented to the freight forum for review and actions from these studies are supported where consensus is delivered within the freight forum
- Signing of the Global Memorandum on understanding of Zero emission medium and heavy duty vehicles (HDV) was premature and whilst it is great to articulate ambition in relation to decarbonisation, it is also important that ambition works alongside industry realities. Infrastructure and the ability to create green energy is a real challenge to meeting ambitious targets.
- Transition to circular economy must be all inclusive – reference to road freight statistics does not include the whole freight industry –
 - The haulage sector relates only to 50% of the Heavy goods vehicle fleet
 - There are approx. 40,000 HGV in Ireland
- Based on the FTAI Managers Guide to Distribution costs report the average distance travelled by vehicles was 319km in 2021
 - 25l fuel per 100km

- 319 x 240 days = 76,560km per vehicle (on average per year)
- 76560 x .25Litres per Km = 19140litres fuel used per vehicle per annum
- Total km travelled per annum is 3,062,400,000 (3 billion Km)
- Total Litres used per annum is 765,600,000litres approx.
- **Questions:**
 - How do you replace 1 billion litres of diesel?
 - What can be done now to reduce fuel burn?
 - Driver training – under health and safety legislation this should be done anyway?
 - What can reduce emissions by 20% (and over)
 - Driver training
 - Newer euro VI trucks – replace old rolling stock
 - CNG trucks (increases to 100% with Biomethane which is available)
 - HVO – not enough supply
 - See appendix 1 for fuel comparisons delivering Co2 savings
- Grid access information is urgently needed,
 - HDVs are on 12mth lead times, whilst this will reduce no-one can order a battery electric truck without knowing if they can get a connection for the charger.
 - Operators shouldn't need outside (paid) help to answer this question just their MPRN no. and no. of trucks / time of day i.e., a simple online form.
- ECOdriving needs to be defined as results based in L/100km before and after - otherwise you'll just have another CPC situation
 - We do it this way and its funded by Enprova for measured results.
- CNG / BIOMETHANE – Fuelling stations EU¹



- Page 37 Comment ' *interim non-technological solutions and complementary measures will need to be implemented in the short- to medium-term to meet the required emissions*

¹ <https://ec.europa.eu/transport/infrastructure/tentec/tentec-portal/map/maps.html?layer=11,12,13,14,15>



abatement targets. 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.'

- Whilst elements of this are rational such as eco driver training, we need to be realistic about the following
 - Mode shift – this is not a viable short to medium solution for Ireland
 - Final mile delivery it may suit courier businesses to move to cargo bikes however this is not an option for waste management companies, for retail and consumer goods service providers where multi temp controlled vehicles are required – remember you will require 17 vans for every 1 rigid truck delivery.
 - Moving freight by rail is very limited opportunities in Ireland due to the infrastructure, population densities and improvement in road infrastructure. Any study that is carried out in this area will deliver a similar conclusion! We do not have inland waterways that can support freight movement that will compete with road given our population and where this population is located!
 - However, consideration should be given to linking all Ireland's strategic freight ports with rail connectivity.
 - Improving congestion on arterial city roads for freight will assist in delivering sustainable logistics
 - The State must re-evaluate interpretation of the EU position in relation to supporting diesel powered vehicles - EURO VII engine details have been published by the EU Commission - ***By 2035, Euro 7 is expected to have lowered total NOx emissions from cars and vans by 35% compared to Euro 6, and by 56% compared to Euro VI from buses and lorries. At the same time, particles from the tailpipe will be 13% lower from cars and vans, and 39% from buses and lorries, while particles from the brakes of a car will be down 27%².*** Support must be sustained for alternative fuelled vehicles but it is imperative to support the competitiveness of freight distribution providers that they are incentivised to purchase newer affordable vehicles
 - Support HVO
 - Support ECO Driver Training
 - Introduce scrappage scheme for euro IV & V
 - The Draft strategy does not reference CNG and or Biomethane
 - **See Appendix 2 for Virginia Logistics CNG Case Study**

² <https://www.fleetnews.co.uk/news/environment/2022/11/11/proposed-euro-7-emissions-standard-unveiled-for-cars-vans-and-trucks>

The main source of GHG emissions from Ireland's transport sector is from road transport –accounting for approximately 94% of all transport emissions in 2021.

- Above caption is the eye-catching headline grabber on page 31 – we need a more mature and realistic narrative for engagement with the freight distribution and logistics sector.
- Transport accounts for approximately 20% of Ireland's greenhouse gas (GHG) emissions, Trucks account for approximately 2% of vehicles on our roads but account for 28% of emissions.
- Under the Climate Action and Low-Carbon Development (Amendment) Act 2021 ('the Act'), by 2030, Ireland is now legally obliged to reduce its greenhouse gas emissions by 51 percent, relative to its 2018 emissions baseline.
 - 2030 is only 7 years away – that means -10% CO_{2e} per year whilst growing your business
 - **Page 33 of strategy**. The target for Heavy Goods Vehicles is 700 such vehicles by 2025 and 3,500 by 2030, representing just under 2% and 9% respectively of the overall heavy goods fleet (over 7.5 tonnes) registered in Ireland
 - The target relates to Low Emitting Vehicles
 - Icon of electric is not relevant
 - There are many options of low emitting vehicles
 - HVO, CNG (Bio Methane – supported under RePowerEU¹ - <https://audiovisual.ec.europa.eu/en/video/1-225403?&lg=EN>)
 - **Page 35** – the comment *'Though in recent years, there has been a high level of uncertainty as to the likely technological pathway for decarbonising heavy-duty vehicles (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 vehicle drivetrains emerging as the preferred technology.'* Is misguided. FTAI have been calling on Government to engage with industry in a proactive and sustained manner to develop a roadmap to transition – this have not happened yet. Also, other points need to be considered in the context of the comment
 - It is referenced in the document that transition for the haulage sector is complex and the main burden for change is falling on the private car user
 - More definition around transport emissions needs to be explored in relation to this – for example if and when the 2million Irish cars become alternatively fuelled vehicles what impact does that have on the air quality in Ireland.
 - We need to support transition measures that are deliverable now – CNG and BIO Methane has been completely ignored even though a main EU strategy through RePowerEU to support Bio Methane production.
 - In the context of comments like this it needs to be clear on deliverables and timelines – whilst you can buy a hydrogen commercial vehicle and an electric vehicle the infrastructure is not there to support them, the green production of the energy is not available so we must include in the roadmap the supports for technologies that deliver now such as HVO, CNG, Bio Methane etc
 - BIOFUELS Obligation as outlined and highlighted in the haulage strategy is not ambitious enough for HGV operators. The scheme is designed for the private car sector. HGV Fleets are looking at 100% Biofuel HVO – Certia Ireland will be bringing in 50,000,000 litres into Cork at the end of 2022.
 - Alternatively Fuelled Heavy-Duty Vehicle (AFHDV) Purchase Grant Scheme in March 2021.
 - 70% applications were for CNG Vehicles
 - Confirm is CNG is supported going forward
 - **Why no CNG case study page 46/47?**
 - Ireland will join like-minded states in the signing of a **Global Memorandum of Understanding on Zero-Emission Medium-and Heavy-Duty Vehicles**, which would also increase the level of current ambition.
 - This MoU sets out a global commitment to achieve a minimum of 30% of all new MHDV sales (bus and truck) to be zero-emission by 2030??
 - 25000 new Commercial vehicles sold in 2022 – 30% = 7500 zero emission targets which is 10 times more than detailed in the Climate Act (and that ambition is for low emitting vehicles) – clarity is required on how many of these relate to HGVs

- Feedstocks for biofuel must be ringfenced for transport now for road, and later for aviation.
 - HVO & BioGases already compete on price with datacentres and big pharma when both have alternatives and blank chequebooks.
 - See <https://www.gov.ie/en/publication/89e44-report-a-review-of-requirements-and-constraints-on-biofuels-in-ireland-arising-from-red-ii-and-national-targets-prepared-by-byrne-ocleirigh-for-department-of-transport-the-national-oil-reserves-agency/>
- **Biomethane**
 - EU policy is that Biomethane³ can play an important role to achieve the [REPowerEU plan's](#) objectives of diversified gas supplies and reduce the EU's dependence on Russian fossil fuels, while simultaneously reducing exposure to volatile natural gas prices.
 - EU will support production to a sustainable potential volume of biogas to further upgrade it to biomethane and to direct biomethane production from waste and residues, avoiding the use of food and feed feedstocks leading to land use change issues.
 - By 2024, EU countries have to collect separately organic waste, which will be an opportunity to upscale the production of sustainable biomethane and create income opportunities for farmers and foresters
 - The [Biomethane Industrial Partnership](#) (BIP <https://bip-europe.eu/>) was launched on 28 September 2022. Its objective is to support the achievement of the EU target of 35 bcm annual production and use of sustainable biomethane by 2030 and to create the preconditions for a further ramp-up of its potential towards 2050.
 - Air quality – with domestic burning now illegal focus will move to traffic.
 - Key that govt makes Euro VI minimum for low emissions zones, not Euro 7 VII as that will mean same situation as UK where HDVs will be swapped for polluting vans on urban routes.
 - Ireland will adopt REDII factors and savings for biofuels – no real change. But can DoT publish the readily available CO2 factors so operators don't need outside consultants like me to help them do the simple math? That would free us up to focus on reductions.
 - When negotiating at EU level in support of ambitious EU Green Deal ensuring Irelands interests are reflected – this is an area where the freight forum can build consensus on the issues for negotiation. The EU green deal is already ambitious, Irelands Island nation status means that our interests will be somewhat different to the EU wide interests. Our Ten T network is limited, so investment in alternative fuels infrastructure on this network will not support Ireland transition to alternative fuels. The multimodal ambition at EU level will not transpose itself to Ireland as we have limited use of inland waterways and rail freight requirements – even if we want this to change it will never be worth the investment required!!
 - ZEVI - Zero Emissions Vehicles Ireland (ZEVI) office must have input with and from the road freight forum to enable joint up thinking on solutions and issues for the road freight sector.
 - The longer trailer trial should have been activated long before being included in the haulage strategy. As a trial it is dependent on quick implementation to deliver quick results. From FTA Irelands perspective our ambition was to get more than one company involved in the trial!

³ https://energy.ec.europa.eu/topics/renewable-energy/bioenergy/biomethane_en

Hydrogen Strategy⁴

- EU published in November 2018⁵, the share of hydrogen in Europe's energy mix is projected to grow from the current less than 2%⁶ to 13-14% by 2050⁷
- Today renewable and low-carbon hydrogen are not yet cost competitive compared to fossil-based hydrogen. To harness all the opportunities associated with hydrogen, the European Union needs a strategic approach. EU industry is rising to the challenge and has developed an ambitious plan to reach 2x40 GW of electrolyzers by 2030⁸. Almost all Member States have included plans for clean hydrogen in their National Energy and Climate Plans, 26 have signed up to the "Hydrogen Initiative"⁹, and 14 Member States have included hydrogen in the context of their alternative fuels infrastructure national policy frameworks¹⁰.
 - **Ireland Alternative Fuels Infrastructure national policy¹¹**
 - Post-2030, it is likely that hydrogen will increase its penetration across the entire fleet spectrum with a correlated decline in the predominance of vehicles run solely on fossil fuels.
- Twenty-five European governments support new Hydrogen Initiative¹²
 - The Hydrogen Initiative is supported by Switzerland, Iceland and all EU member states except Ireland, Slovakia, Slovenia, Sweden and the UK. The initiative is also supported by the European Commission.

Road Safety

- Enforcement must be increased – more rigorous and fair enforcement of the rules must become the norm – whilst roadworthiness and tachograph and working time compliance is reviewed, there is very little focus on safe and secure loads. This is needed for a fair balanced and competitive marketplace
- CPC – needs to be comprehensively reviewed with a focus on standards of training providers not on the quantity of training providers available to deliver cpc training!

Skills / Labour Market

- The Logistics Supply Chain Skills Group should be the catalyst for establishing a centre of excellence for supply chain and logistics skills development. Utilisation of education providers on the panel to develop a white paper that makes recommendations to support future job creation and necessary skills required to fill those jobs should be considered.

⁴ https://energy.ec.europa.eu/topics/energy-systems-integration/hydrogen_en

⁵ A Clean Planet for All. A European strategic long-term vision for a prosperous, modern, competitive and climate neutral economy, COM(2018) 773.

⁶ FCH JU (2019) Hydrogen Roadmap Europe. This includes the use of hydrogen as feedstock.

⁷ Considering hydrogen consumption for energy purposes only, the shares in different scenarios range from less than 2% to more than 23% in 2050 (Moya et al. 2019, JRC116452).

⁸ 40 GW in Europe and 40 GW in Europe's neighbourhood with export to the EU.

⁹ Linz declaration, 17-18 September 2018. <https://www.eu2018.at/calendar-events/political-events/BMNT-2018-09-17-Informal-TTE.html>.

¹⁰ Submitted under Directive 2014/94/EU.

¹¹ <file:///C:/Users/aflynn/OneDrive%20-%20Logistics%20UK/Policy%2022/2022/Environment/alt%20fuels%20national%20policy%20framework.PDF>

¹² <https://greenovate-europe.eu/twenty-five-european-governments-support-new-hydrogen-initiative/>

Final Mile Deliveries

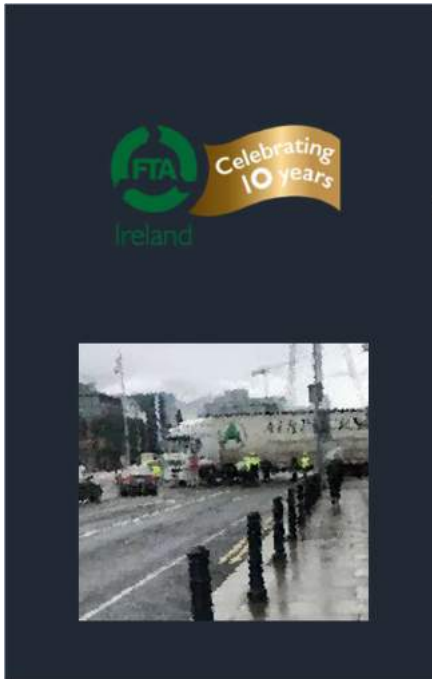
It is essential that all stakeholders involved in city planning are engaging with the freight forum to ensure that goods deliveries and essential service providers can continue to provide services necessary for towns and cities. Currently there is a lack of engagement and decisions are being taken on reducing motor traffic flows to prioritise pedestrians and cyclists and since covid on street dining without considering the implications for deliveries. Future planning must prioritise supply of essential services and accommodate HDVs.

South Fredrick Street Loading bays full with cars



Deliveries for the service sector cannot be made due to inadequate unloading areas – food and retail cannot be delivered in an efficient and safe manner by breaking down loads into much smaller loads as it becomes economic unviable and there are challenges with the number of additional journeys needed to deliver. The current situation in our cities is causing distress to drivers who are being confronted in aggressive manner by pedestrians and cyclists as they carry out their duties. In

In addition, they are also receiving parking fines because the loading bays have been taken over by outdoor dining and or non-enforcement of illegal parking.



Urban Delivery Challenge

- Kerbside access
- Loading space availability
- Delivery restrictions
- Cycle Infrastructure
- Pedestrianisation
- Other competing demands
- Street furniture

Urban Solutions

- Retiming deliveries
- Logistics land and supporting infrastructure
- Procurement and consolidation
- Final Mile delivery options
- Consistent rules and regulations
- Stakeholder Synergies and engagement



Big can be better!



A medium **lorry**
can carry **10,000kg**

A **van** can carry
1,000kg

While an
eCargo bike
can carry
100kg



ONE lorry

=

100

eCargo bikes

FTA Ireland response to the published 'Ireland's Road Haulage Strategy 2022 – 2031 [Draft]



APPENDIX 1 – DIESEL V HVO/ELECTRIC COMPARISON

100,000km per annum assumed	Fossil	Waste & Green H2	Grid
44t artic <300km per day, 100,000km/yr (400km/day)	Fossil	UCO & Green H2	Grid > Battery
	Diesel	HVO B100	Electric
Energy Efficiency vs Euro VI	Baseline	7%	-60%
Performance L/100km	33.00	35.31	
Compare in kWh/100km	335.60	359.10	134.24
Cost per unit (L/kWh) exc/ VAT	1.545	1.854	0.337
Energy cost (100,000km)	€ 50,976	€ 65,453	€ 45,239
<i>Energy use in kWh /100,000kWh</i>	<i>335,577</i>	<i>359,067</i>	<i>134,231</i>
<i>Irish kgCO2/kWh in 2021</i>	<i>0.248</i>	<i>0.027</i>	<i>0.345</i>
Annual emissions in kgCO2	83,106	9,623	46,310
<i>Int'l factors (GLEC) WTW</i>	<i>3.17</i>	<i>0.32</i>	<i>0.30</i>
<i>Annual Kg CO2/100,000km</i>	<i>104,610</i>	<i>11,440</i>	<i>40,672</i>
Sources			
BEV Performance	https://www.volvotrucks.com/en-en/trucks/trucks/volvo-fh/volvo-fh-electric.html		
HVO	Neste certificate - one batch others may be lower CO2/L		
Tonne CO2e avoided vs diesel	0.00	93.17	63.94
Capex	€100,000	€0	250000 + charger c€50,000 +grid barriers
Costs in Euro / tonne CO2 avoided	€48.50	€702.51	€4,243.43
Notes	€48.50/t CO2inc.	Inc €48.50/t CO2? + Excise	Zero excise - net loss to exchequer
	23% vat	23% vat	13.5% vat
	Excise @xxc/L	Excise @xxc/L	Zero excise - net loss to exchequer

Appendix 2 – Virginia Logistics Case Study

Virginia International Logistics' migration to Biomethane as a road fuel.

During 2013 the team at Virginia commenced a pilot project by converting two trucks to dual - fuel (Gas & Diesel). The programme was successful and continued until 2018, during that time further research was done on emerging OEM gas trucks, gas compressors and gas procurement.

With the arrival of OEM gas trucks into Ireland in spring 2018, two dedicated gas trucks were delivered as we opened our new gas filling station at Ballycoolin, Dublin.

In 2019, Virginia International Logistics were the first haulier in Ireland to complete a zero carbon Heavy Goods Vehicle's (HGV) delivery to Europe. The trucks were fuelled in Ireland and France with biomethane, facilitated and certified by Flogas. The cargo consisted of fresh Irish beef from Liffey Meats, Ballyjamesduff, Co Cavan delivered to their facility in North. France. The total round trip was 1,121 km.

To date we have dispensed over 2.3 million Kg of gas into our trucks, we now have 25 gas trucks in our growing fleet. Some statistics from 2021 are:

- o Kg used: 255,298
- o Carbon saved: 297 Tonne

During the summer of 2022 we investigated the possibility of purchasing biomethane for our Irish gas trucks, this concluded in August 2022. We now operate our trucks on 100% biomethane secured from Flogas our gas supplier. This is indigenous biomethane sourced and injected into the national grid by Green Generation, Nurney, Co Kildare.

To facilitate our growing fleet of gas trucks Virginia Logistics will open a second CNG Station in collaboration with Gas Networks Ireland at Virginia Co Cavan within the next few months. This station will be open to the public and be capable of filling a truck in 10 minutes. The station will have facilities to fill trucks and vans with biomethane.

Today we offer carbon free deliveries to our Irish customers therefore assisting with their overall carbon footprint.

In the UK we have a small fleet of gas trucks, biomethane is readily available at the public filling stations, today we offer our Irish and UK customers carbon free deliveries in the British Isles.

Comparison between Actions in Draft Consultation and FTA Ireland Original Submission – November 2022

Whilst we acknowledge that 20 out of the proposed 33 action points match recommendations made by FTA Ireland in our original submission, we again draw your attention to the other recommendations that we submitted as they remain important to our members.

Topic	Question	FTAI Recommendations	Road Haulage Strategy Actions November 2022
COVID-19	What lessons can be learnt from the COVID-19 pandemic, in terms of Ireland being better prepared for any future pandemic and to help the resilience of Ireland's supply chains?	<ul style="list-style-type: none"> Emergency response committees to include stakeholders from the freight distribution and logistics sector. Better communication from agencies with responsibility and links to the supply chain is critical. The complexity of the supply chain means that more education and training must be provided to ensure a better understanding for all stakeholders. Consistent approach from all EU member states to support movement of goods. Recognition that all in the freight distribution and logistics sector are essential workers. 	ACTION 2: Establish a Road Freight Forum with representatives from relevant Government Departments, Agencies and the haulage, freight distribution and logistics sector
	Are there any suggestions for policy support to address the challenges that have been experienced as a result of the COVID-19 pandemic?	<ul style="list-style-type: none"> Create a sub-group of the Emergency Planning Government Task Force, with representation from the freight distribution and logistics sector. The HSA / RSA should be more pro-active in engaging with key stakeholders to ensure consistency of messaging and should promote work related vehicle safety and driving for work compliance within the sector. More flexibility to alleviating the expense associated with operating a commercial fleet. State agencies charged with issuing motor tax or new vehicle registration / changed of ownership / operator licencing etc. must continue to be resourced and operate throughout the period. 	<p>ACTION 2: Establish a Road Freight Forum with representatives from relevant Government Departments, Agencies and the haulage, freight distribution and logistics sector</p> <p>ACTION 26: Draft and formulate a National Safe Work-Related Road Safety (WRRS) Code of Practice</p>
Brexit	What further action or planning is required to help the haulage sector adapt to the changes as a result of Brexit?	<ul style="list-style-type: none"> further integration and upgrading of systems across Government Departments / agencies in order to reduce the administrative workload on the haulage sector. remove the requirement for entry and exit safety and security declarations. Develop strong maritime links closer to key European Strategic locations (France/Netherlands/Belgium) is sensible and should be supported by Government policy. Enhance supports for HCV drivers including facilities for hauliers at ports. Guidance needs to be developed for Authorised Economic Operators (AEO). 	<p>ACTION 3 – 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.</p> <p>ACTION 4 – 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.</p>

		<ul style="list-style-type: none"> • Unaccompanied trailers safety and security declarations should be the responsibility of the carrier (the shipping company). • Sufficient resources should be provided at Irish Ports for parking, road accessibility and departure and arrival times of ferries should be coordinated to minimise the impact on traffic congestion. • Synergies between the state agencies assigned with responsibility for customs. Sanitary and Phytosanitary checks, immigration and other regulatory controls need to be developed through IT systems. • EU Commission should consider facilitating holders of an Irish issued Transport Manager CPC qualification, working in Ireland but living in Northern Ireland, to act as the nominated Transport Manager for an Irish (EU) registered haulier. 	
	<p>How does the sector see the EU-UK relationship in road haulage under the TCA evolving over time?</p>	<ul style="list-style-type: none"> • Establishment of the Partnership Council and committees is important in implementing the bi-lateral structures that can consider issues raised. 	
<p>Environmental / Decarbonisation</p>	<p>What is needed to incentivise the take-up and usage of a greater number of less polluting HGVs?</p>	<ul style="list-style-type: none"> • Commercial Transport sector is a multifaceted entity that needs clearer definition for the purpose of pursuing solutions that support a sustainable transition to alternative cleaner fuels. • A Multifuel Safety Framework should be considered to provide guidance and information as to the viability and availability of alternative fuels. • consideration must be given to understanding the cost associated with transitioning to newer fuelling technologies, the availability of the technologies, the cost of the new technologies, the lifespan of the new technologies and most importantly the infrastructure available to support the effective transition. • Those that continue to operate Diesel commercial vehicles (especially Euro VI+) must be supported to ensure they do not face an unfair competitive environment. • Ban imports from UK of older EURO IV / V vehicles • Incentivise better load management – reduce the requirement for empty running. 	<p>ACTION 6: Advocate for and support EU regulations that promote more stringent HGV vehicle emission standards</p> <p>ACTION 14 Update National Policy Frameworks on the use of Alternative Fuels in Transport.</p>

		<ul style="list-style-type: none"> • realistic transition deadlines must take account of lack of viable alternatives, production and availability of alternative fuelling technology, The cost of the infrastructure and the global availability of the technologies. • Grants need to be maintained for the next few years to encourage a large sector take up which will support the business case for further fuelling forecourts, charging points etc. • Need to develop culture of understanding the benefits of reducing carbon footprint. • Support for pilot projects addressing alternative fuels • Further toll charge reduction incentives • Support for development of Biomethane • CNG fuelled vehicles save approximately 28 tonnes of Co2eq per vehicle each year. As this fuel is available it should be supported in a more public manner as a transition and a viable solution for operators as they plan for net zero. 	<p>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</p>
	<p>What is needed to incentivise less polluting Light Commercial Vehicles?</p>	<ul style="list-style-type: none"> • Further toll charge reduction incentives • Funding for suppliers of chargers and alternative fuel facilities to ensure a well-maintained infrastructure. • Home chargers to be included for those operating company electric vehicles. • Grants for commercial chargers for leased vans not just owned vehicles. • Price of alternatives need to be comparable to diesel. • More places to fuel/recharge • Commercial SEAI grants at least matching private grants for Commercial vans. 3,800 vs 5,000 • Access to fast chargers e.g., longer cables on existing chargers. • Clarity should be provided on how the electricity that is used to recharge vehicles is produced (how much through wind energy) • More details and guidance should be provided on how and where batteries are sourced. 	<ul style="list-style-type: none"> •
	<p>Should eco-driver training be rolled out further, for example, as part of Driver CPC training?</p>	<ul style="list-style-type: none"> • Define Eco driving in a manner that delivers results from a blended approach that includes in-cab training, classroom • Transport Manager CPC programme should be overhauled to reflect the technology and tools that future drivers and transport managers will be dealing with in the next 10-20 years • Driver training should not only be encouraged through the driver cpc module but also 	<p>ACTION 7: Establish a national certification/accreditation system for eco-driving courses. Consider mechanisms/incentives for operators to adopt and maintain eco driving practices, including</p>

		<p>supported through the development of a code of practice for safe fleet operations, to include guidance regarding risk assessments and training for drivers similar to the driving for work programme</p>	<p>potential integration into the Driver CPC programme</p>
	<p>Would more consolidation/distribution on centres assist in better management and distribution of goods within Ireland?</p>	<ul style="list-style-type: none"> • Authorities for Ireland's main urban centres need to review their freight distribution movement plan and to develop a more freight friendly strategy that takes account of the environment, traffic congestion, local residents, vulnerable road users and the distributors themselves • different solutions for different sectors of industry, some of whom are already do a high degree of consolidation as it is the basis of their business. • For express parcel sector the following should be considered: <ul style="list-style-type: none"> ○ consolidation could drive inefficiencies through additional journeys, double handling of packages, vehicles dropping off volume and then traveling back empty. ○ Data protection – who owns the customer data? Customer data cannot be shared easily/legally. ○ Who deals with the customer service issue on the final mile in case of loss, damage, delayed deliveries? • Micro consolidation sites within city centres do have value and should be explored. This offers the opportunity to deliver to designated hubs with perhaps double trailers where one is dropped in one location and one in another. 	<p>ACTION 8: Complete study examining the feasibility of developing logistics hubs near urban centres to consolidate and rationalise freight transport & identify next steps</p>
	<p>How can we work to promote more efficiencies within the sector? Please refer to any best practice examples that you may have come across, whether in Ireland or abroad.</p>	<ul style="list-style-type: none"> • Prioritise and encourage double length trailer usage. • To ensure a vibrant and competitive marketplace it is very important that the increase in carbon tax and the cost of diesel does not compromise SMEs and those operating diesel-powered business who have no alternatives due to prohibitive costs of the new technology, the lack of availability 	<p>ACTION 10 Launch a call to the private sector re specific transport operations which may be suitable for a Longer Semi-trailer Trial. Department of Transport, Road Safety Authority and Transport Infrastructure Ireland will review proposed</p>

		<p>of the technology or where the infrastructure has not been developed to support the new fuelling technologies.</p> <ul style="list-style-type: none"> • Another key challenge faced with expanding electric fleet is not having enough grid capacity to charge these vehicles simultaneously at peak times in the evening. • Allow more efficient delivery opportunities outside peak hours. Trucks are getting quieter every year with silent electric trucks due from 2025. Take this into account when planning urban delivery rules. • Make narrow delivery time windows wider to allow trucks to cope with the unusual traffic patterns to come. • Capital support to de-risk service station supply of alternative fuels for electric / CNG / LNG etc. • Confirm lowest rate of tax will be for Euro VI / 6d where Adblue is being used and not by-passed; implement now to stop imports of dirty Euro I-V commercial vehicles from UK. • Incentivise Euro VI & CNG vehicles with reduced road tolls and clarity (Euro VI) on LEZs – trucks bought today will be on fleet for next 4-5 years and on-road for 10-12 years! • The current rate of excise applied to natural gas for transport use be retained until such time as the proportion of the commercial fleet market transitioned to natural and renewable gas reaches a minimum of 30% of the HGVs and Buses national fleet. • Last mile delivery. Support cargo bikes. Congestion charges in urban areas • Barrier free tolling • Smart Motorways – better traffic Management, particularly in Urban centres • Encourage holistic approach to carbon transition by providing necessary education and training to develop competencies. • Support Biomethane production • Develop education and training modules within all training and education programmes for the transport and logistics sector as well as for trade apprenticeship such as mechanical engineer. 	<p>operations and make a recommendation on proceeding with a pilot project, taking into account infrastructure impacts and road safety</p> <p>ACTION 9 Conduct a study to examine the role of biofuels tax and inform renewable transport fuels policy development</p> <p>ACTION 11 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</p>
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Road Safety	What are the road safety priorities in road haulage for the next 10 years?	<ul style="list-style-type: none"> • Create more awareness around the implications of poor driving behaviour. • Authorities charged with regulating the industry must be sufficiently resourced. • Powers to immobilise vehicles where there is issues with cabotage, roadworthiness or tachograph. • Review must take place in Ireland of the powers afforded to the RSA inspectors.. • Smart Card – one card to contain all licencing information and driver qualifications/certification. • Electronic Roadworthiness Cert for trailers • Adopt Driver CPC training programme to allow CPD (Continuing Professional Development) that would recognise specialised certified training. • New road safety campaigns and guidance should be developed to promote the effective and safe driving practices and utilisation of the new technologies. • Develop more engagement with commercial fleet operators to ensure road safety messages are aligned and filtered down to all organisations. • Graduated Fixed Penalties should be introduced. • Review the CVORI and publish annual findings in relation to the state of compliance of commercial vehicles, including the key roadworthiness issues. • The level of enforcement must be such as to act as an incentive to non-compliant operators to either change their ways or stop operating. • Carry out a media campaigns on the correct use of lighting for vehicles to include flashing amber. • The RSA should develop stronger links with industry through consistent engagement with trade associations and collaborative outreach programmes. • Milk collection operations should come in under the tachograph regulations as this service is predominately carried out by the licenced haulage sector. • Promotional activities surrounding medical fitness to drive including good eating habits and the links with improved road safety should be developed for the haulage sector. 	<p>ACTION 28: Develop increased enforcement powers for both the RSA and AGS to deal more effectively with road safety infringements by commercial vehicles.</p>
	How are these priorities best addressed?	<ul style="list-style-type: none"> • Industry review of the Driver CPC training regime. Examine and explore CPD 	<p>ACTION 27: Review the content of the driver CPC with a view to reforming</p>

		<p>opportunities and develop consensus for change.</p> <ul style="list-style-type: none"> • Specific actions should be developed with clear allocation of responsibility. • A cost benefit analysis should form part of a prioritisation and assessment of actions under the Strategy. • Necessary provision of resources for the RSA and An Garda Siochana • RSA to appoint a liaison for the freight distribution and haulage sector. 	<p>the programme to ensure it remains relevant and useful for drivers.</p>
	<p>What actions can be taken to help communication and cooperation between the road safety authorities and the haulage sector?</p>	<ul style="list-style-type: none"> • Regular engagement with stakeholder that are willing to work with the authority. • The CVORI needs to be re-invigorated to establish trust within the industry that it is a scale of compliance and something that should form part of all conscientious operator's operation compliance targets. 	
	<p>What could be done to help operators to comply with road safety regulations and to reduce the regulatory burden, particularly for smaller operators?</p>	<ul style="list-style-type: none"> • Consolidation of Legislation • The RSA, HSA and other stakeholders should work collaboratively with the haulage sector to provide sector specific road safety education campaigns 	<p>ACTION 26: Draft and formulate a National Safe Work-Related Road Safety (WRRS) Code of Practice</p>
<p>Mobility Package</p>	<p>What are your views on how Ireland implements the Mobility Package changes?</p>	<ul style="list-style-type: none"> • Support the establishment of a 'body' with overarching responsibility for commercial transport operations. • Authorities responsible for regulation and enforcement must provide regular updates to industry on the new requirements to ensure all have the ability and means to be compliant. • It is important that authorities in Ireland do not create an unfair environment for Irish business by not implementing elements of the Package that are rigorously enforced in other Member States. • The Department of Transport is currently responsible for operator licencing in Ireland. Will Van licencing sit in this Department? 	<p>ACTION 29 Implement the EU Mobility Package and provide information to Industry</p>
	<p>What are your views on the return of the truck?</p>	<ul style="list-style-type: none"> • As Ireland being an island state, FTAI seek consideration for compensation for the increased costs of connectivity with continental Europe and or a derogation 	<ul style="list-style-type: none"> •

		<p>seeking an exemption from the requirement to return to Ireland within 8 weeks</p>	
Road Infrastructure	<p>Are the needs of freight transport sufficiently taken account of within the national infrastructure planning and investment programmes?</p>	<ul style="list-style-type: none"> • Consideration must be given to our key strategic ports and the facilities available to drivers. • fair, proportionate and consistent enforcement is critical to the sustainable implementation of compliant operations and drives a culture that recognises the legislation and the regulations as underpinning a fair, competitive safer environment for all. 	<p>ACTION 18: Ensure the infrastructure strategy for the national road network takes account of the needs to the Haulage sector</p>
	<p>What more is needed in relation to road user charging for freight transport in Ireland?</p>	<ul style="list-style-type: none"> • Clear guidelines need to be developed advising industry of the plans for future road user charging for freight transport. • A common approach to road charging to provide a benefit to the industry overall, against the increase in costs as a result of charging and tolling. FTAI would like to see the money collected to provide better infrastructure within certain constraints. • The current reduction in Toll rates for users of 'Alternative Fuels' should continue. 	<p>ACTION 19: Advance Better Road User Charging Evaluation (BRUCE) - Draft implementation plan by Q2 2023</p>
Labour Market / Skills	<p>How can more people be encouraged to take up work in the road haulage sector, e.g., as HGV drivers, Transport Managers, customs roles, etc.? Please provide concrete suggestions/best practice examples.</p>	<ul style="list-style-type: none"> • Key to attracting people into the sector is making it easy for people to understand the available roles and the career progression opportunities linked with the haulage sector • Link qualifications on the National Framework of Qualifications (NFQ) with the profession of professional driving • Better and more consistent enforcement of non-compliant operators • Support better succession planning through guidance and supports. • Consignor Liability - Raise awareness by contractors of haulage services of their legal obligations. Guidance should be developed to support consignors' understanding of their legal obligations when procuring third party haulage services. (this can be included in the proposed Code of Practice for the haulage sector) • The freight distribution and logistics sector (including the haulage sector) must become more active in encouraging and promoting gender diversity within the industry 	<p>ACTION 31 The LSCSG will organise an inaugural Skills Week for the Logistics and Supply Chain sector</p> <p>ACTION 33 The LSCSG will look to establish research workstreams on attractiveness of the industry – improving gender balance and diversity, improving working conditions and work/life balance.</p>
	<p>How can the ability of the sector to attract and retain talent be strengthened to service the demand for skills over the coming years?</p>	<ul style="list-style-type: none"> • Developing a consistent and sustainable outreach to secondary schools and further education providers is important in highlighting the diversity of roles and opportunities that exist in the freight distribution and logistics sector including the haulage sector. 	<p>ACTION 32 The LSCSG will continue to promote careers in logistics and supply chain and oversee the implementation of the Recommendations on HGV Driver Shortage</p>



		<ul style="list-style-type: none">• More support is required for the establishment of training programmes and apprenticeships that support the haulage sector	
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Thanks for consideration of these points

Aidan Flynn
30th November 2022



Galway Cycling Campaign

info@galwaycycling.org

30th November 2022

Consultation: Department of Transport

Region: Galway City (and MASP)

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

On behalf of the committee please find below our observations on the above consultation. We would welcome an opportunity to meet with Department officials to explore our submission in greater detail.

Introduction

The Galway Cycling Campaign is an advocacy group established in 1998 to make Galway cycling-friendly. We currently have approximately 100 paid members in Galway City and County and are active member groups of the Galway Environmental Network and the Galway City Community Network (part of the Public Participation Network).

Our objectives are to:

1. get more people cycling and make it an everyday form of transport;
2. advocate to make the roads safer for everyone;
3. improve services and infrastructure for people who cycle, walk, and use public transport;
and
4. educate the public and decision makers in the area of active mobility.

We are a member group of Cyclist.ie. Cyclist.ie is the federation of cycling advocacy groups, greenway groups, and bike festivals on the island of Ireland - <http://cyclist.ie/>. Cyclist.ie is the Irish member of the European Cyclists' Federation - <https://ecf.com/>.

The common vision of the Galway Cycling Campaign, Cyclist.ie and the European Cyclists' Federation is that cycling becomes a normal part of transport and everyday life for all ages and abilities.

Background Context

Galway has a significant traffic problem as referenced multiple times within the Galway Transport S
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Eamon Ryan (Dublin Bay South, Green Party)

I share the Deputy's concern about the speed of development of a whole range of different transport solutions and sustainable transport solutions in particular. I hope I am not being controversial and I mean no disrespect to anyone in Galway but Galway is probably where we have our biggest and worst problem with regard to sustainable transport. The city has been very successful in developing but it has an unsustainable transport model that prioritises and promotes transport based on individual cars. I do not blame or fault people who have to use their own cars but it becomes completely unsustainable when a certain level of traffic is reached. That is where we are in Galway. We need to accelerate some of the sustainable transport solutions in Galway, particularly some of the active travel and BusConnects infrastructure, which would help people use the infrastructure we are discussing, and the development of the railway station at Oranmore, which we mentioned earlier. That integrated approach is required. Park-and-ride facilities have to be part of wider sustainable transport solutions. We should also have bike-and-ride facilities. There is significant potential in providing bike parking, particularly at rail and bus stations. Particularly in light of new electric bikes, there is capacity to rethink how our cities and rural communities work. We need to accelerate development not only of the park-and-ride facilities, but of the active travel and bus travel infrastructure that needs to go with those facilities as part of an overall solution.

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Eamon Ryan (Dublin Bay South, Green Party)

Link to this: [Individually](#) | [In context](#) | [Oireachtas source](#)

I mention Galway city and what we should do there to turn matters around. I hate to say this, and I have discussed it with the Leas-Cheann Comhairle before, but Galway probably has the least effective transport system of our five major cities. What could we do in three years or what targets could we set ourselves? I visited Galway the week before last and asked the local authority and the local chamber of commerce to come back with proposals for BusConnects, cycling and greenway projects that we could deliver in the next three years.

Minister for Transport - Response to Parliamentary Question - 31 May 2022

Given its compact nature and topography, Galway City lends itself to facilitating significant levels of active travel, and particularly cycling, if appropriately provided for. We welcome the Road Haulage consultation, and see it as an important building block in helping to solve the traffic problems in Galway and beyond.

We seek every and any opportunity to improve the levels of active travel in Galway for the following reasons;

- The Galway Transport Strategy (2016) is the current strategy informing decisions on transport planning in the Galway Metropolitan Area Strategic Plan. However, our position is that the active travel goals within the Galway Transport Strategy have **always** been inappropriately low, and indeed significantly so. This is illustrated from the following extract of Modal Share Percentages taken from the modelling informing the Galway Transport Strategy, which (*quite unbelievably*) targets a **lower** modal share for Cycling (and Walking) by 2039;

Table 6.5.1: Mode Share Percentages

Option	% Car	% PT	% Walk	% Cycle
2012 Base Year	66.7%	3.9%	26.3%	3.1%
2024 Do-Min	67.4%	4.2%	25.4%	3.0%
2024 Do-Something	68.4%	4.0%	24.9%	2.7%
2039 Do-Min	67.4%	4.3%	25.2%	3.1%
2039 Do-Something	68.6%	4.1%	24.5%	2.8%
2039 Galway Transport Strategy	67.3%	5.0%	24.9%	2.8%

Extract - Galway Transport Strategy - Appendix A.6.1 Phase 3 Traffic Modelling Report

This is in sharp contrast to wider policy goals discussed in our second point below.

Road Haulage Strategy consultation - Submission of Galway Cycling Campaign

- Since the Galway Transport Strategy was published in 2016, EU and National policy in favour of significant additional reductions in Transport emissions have been enshrined in law. As noted above, in our view the 2016 targets for modal share of cycling (by 2039) were always significantly unambitious. However, given the significantly increased targets in the interim, it is now extremely difficult (if not impossible) to see how the modal share percentage targets which formed the building blocks of the Galway Transport Strategy could be consistent with those Sectoral Emission Ceilings for Transport prepared in line with the Climate Action Plan and published in the September 2022. [See Tables below]

Table - Sectoral Emission Ceilings³

(Figures for MtCO₂e for 2018 and 2030 have been rounded. This may lead to some discrepancies)

Sector	2018 Baseline (MtCO ₂ e) ⁴	Sectoral Emission Ceilings for each 5-year carbon budget period (MtCO ₂ e)		Indicative Emissions in Final Year of 2021-2025 carbon budget period (MtCO ₂ e)	Indicative Reduction in Emissions in Final Year of 2021-2025 budget period compared to 2018	Emissions in final year of 2026-2030 carbon budget period (MtCO ₂ e)	Reduction in Emissions final year of 2026-2030 carbon budget period compared to 2018	Agreed CAP21 Ranges
	2018	2021-2025	2026-2030	2025	2025	2030	2030	2030
Electricity	10	40	20	6	~40%	3	~75%	60 – 80%
Transport	12	54	37	10	~20%	6	~50%	40 – 50%
Built Environment - Residential	7	29	23	5	~20%	4	~40%	45 – 55% ⁵
Built Environment - Commercial	2	7	5	1	~20%	1	~45%	
Industry	7	30	24	6	~20%	4	~35%	30 – 40%
Agriculture	23	106	96	20	~10%	17.25	~25%	20 – 30%
LULUCF ⁶	5	XXX	XXX	XXX	XXX	XXX	XXX	40 – 60%
Other (F-Gases, Waste & Petroleum refining)	2	9	8	2	~25%	1	~50%	N/A
Unallocated Savings ⁷			-26			-5.25		
TOTAL⁸	68	XXX	XXX	XXX	XXX	XXX	XXX	N/A
Legally binding Carbon Budgets and 2030 Emission Reduction Targets ⁹	-	295	200	-	-	34	51%	-

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Within Galway, we believe the pace of change and commitment to active travel are required to increase significantly to meet not just the 2030 target of 50% reduction, but **more pressingly the 2025 interim target of a 20% reduction.**

As an important aside, it is our view that the Sectoral Emission ambition for reductions within compact urban settings that lend themselves to modal shift such as Galway City need to be **significantly higher** than these ceilings, to offset obvious shortfalls likely to arise in unserved rural settings. It is clear therefore, that the level of ambition shown for cycling in the Galway Transport Strategy is wholly inappropriate.

With the above two points having set the scene, our submission includes areas where provisions for and ambition relating to active travel should be significantly improved within the haulage strategy as it pertains to Galway City and environs.

We ask that you consider our submission points in the context provided.

¹ <https://www.gov.ie/en/publication/76864-sectoral-emissions-ceilings/>

Submission Points

1 - Logistic Hubs for Last Mile delivery in Galway City

We welcome the ambition outlined in the consultation with regard to Logistic Hubs “to support zero/low- carbon last mile delivery services and micro mobility (e.g. e-cargo bikes) alongside larger hubs”

Galway City;

- has quite a compact city centre, with narrow streets surrounding its pedestrianised core;
- has a key rail link right to the city’s core, and indeed Ceannt Station is currently being redeveloped;
- has Galway Port at the heart of the city;
- plans (correctly in our view) to remove the Salmon Weir bridge to all but public transport as part of current BusConnects proposals before An Bord Pleanala;
- does not currently have planning permission for the proposed N6 Galway City Ring Road, and indeed permission is unlikely to be forthcoming given the context of the Climate Action Plan as reasoning for remitting the decision to An Bord Pleanala for an updated review/decision;
- does not have a wide availability of delivery vehicle loading bays, or space available to provide for same;
- has a relatively large proportion of lands under public ownership close to the city centre, rail and port links.

We suggest that Galway City is a prime location for a pilot scheme with regard to a micro-mobility last mile delivery service and that such a pilot scheme should be rolled out as an uimmediate priority for the haulage strategy..

Success for such a scheme in Galway city, a location historically dominated by the private motor vehicle would be an immediate proof-of-concept for such a scheme.

2 - Cyclists and Commercial Drivers as allies

We note the consultation touches on education with regard to vulnerable road users (e.g. vehicle blind spots) and this is welcome. However, we suggest that the education programme could go significantly further.

Our advocacy work brings us in contact with other advocates from various transport environments worldwide. One interesting observation from areas where active travel is most prevalent is the allyship between delivery drivers and cyclists. Professional drivers would see cyclists as allies, and as being one less car on the road taking valuable road space from commercial deliveries. Where cities have more private cars, this permeates to additional on-street parking spaces being required, again taking scarce space from necessary loading bays. Cyclists take some comfort from additional education schemes that professional drivers take up.

We likely have a ways to go for this culture of allyship to pervade in Ireland.

However, we would like to see the education piece within the haulage strategy expanded whereby active travel benefits are illustrated and encouraged in all its forms, promoting the wider benefits modal shift of private journeys would provide for commercial deliveries. Education could include sections on close passes, cycle lane and footpath parking, and how these have wider impacts on cyclists/pedestrians safety (actual and perceived), and the knock on deterrent on modal shift actions such as those cause.

Road Haulage Strategy consultation - Submission of Galway Cycling Campaign

This concludes our submission. Thank you for your time in considering it.

We are open to meeting with your team to discuss our concerns and local experience further, with a view to improving the safety and viability of the plans.

Yours Sincerely,

A handwritten signature in black ink, appearing to be the initials 'I B'.

On behalf of the committee
Galway Cycling Campaign



TRAILER HIRE & SALES

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Hireco Park.
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Tel. 01 855 4144
hire@hireco.ie
www.hireco.ie

30th November 2022

RE: 10 year National Haulage Strategy

To whom it may concern,

We understand that a 10-year road haulage strategy is in preparation by the department.

The Hireco Group have over fifty years' experience in vehicle rental. Currently we have over 8,000 Truck Trailers and over 600 Heavy Truck on rental in Ireland and the UK. In addition, most of our fleet are monitored by our in-house tracking system. We feel, we have real experience of the Truck and Trailer industry, and we would be happy to assist the Dept of Transport with any queries.

We believe that the strategy is looking at a pilot of longer trailers up to 15.65m. Our experience of this trailer length in the UK is not good. There are approx. 1000 x 15.6m Trailers operating under special licence. Customer feedback to us on this length of trailer is not good and the trailer is not successful in many typical applications.

We believe that the department should now champion and promote the European modular system with weights of up to 60T and 25.25m in length. This system allows for a 54% increase in pallets or equivalent floor space versus 15% with the 15.65m LST. A schematic of this combination is attached.

In addition, the European system is best for fuel efficiency, overcoming the driver shortage and less congestion on the roads. Furthermore, it is a very environmentally friendly system with Co2 savings of 25%.

Yours faithfully,

Thomas Smith
Director
Hireco Group Ireland

HIRE | RENTAL PURCHASE | MAINTENANCE | SALES

Hireco Dublin Ltd., Registered No: 400486. Registered Office: Naas Industrial Estate, Naas, Co. Kildare W91 FW64
Directors: H. Flynn (Managing Director) P. Carson R. Hedigan.

The logo features a central orange ring with a small notch on its right side. This ring is flanked by two larger, semi-circular orange shapes that resemble thick, curved brackets or partial rings, one on the left and one on the right. The text "Hireco Group" is centered within the white space of the central ring.

**Hireco
Group**

Hireco Trailers

**YOUR
TOTAL
TRANSPORT
SOLUTIONS**



SOURCE



FINANCE



SERVICE



The Total Transport Solution

We give you peace of mind through a partner focussed, Total Transport Solution. That means a consultative approach with financial flexibility and unrivalled support via our service offering. All that along with our restless ambition to innovate with new products and services, realise and drive our green ambitions into and beyond our industry, shows that we can't and won't stand still – because you don't.

50

Our expertise

Benefit from all the expertise we've gained over 50 years in vehicle rental.

70

Our reputation

More than 70 of the UK's top 100 transport companies trade with us.

3

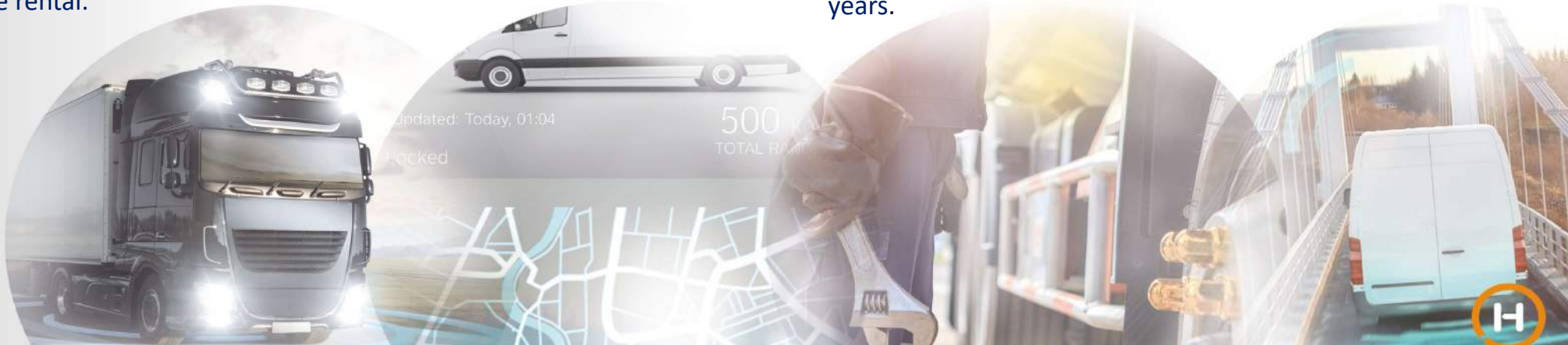
Our quality

Our assets have an average vehicle age of 3 years.

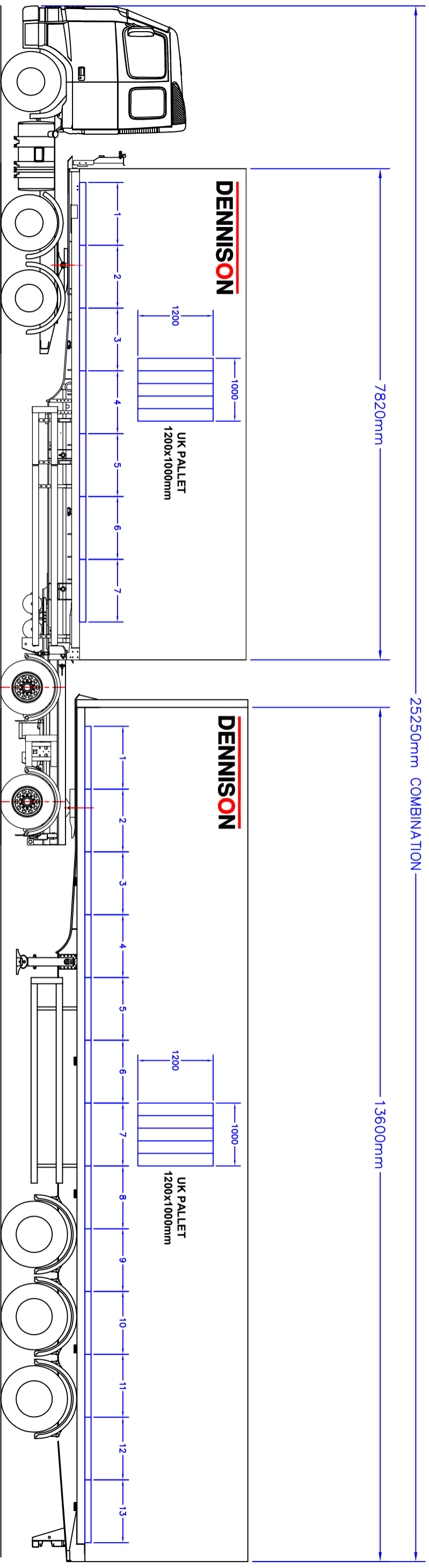
8K

Our assets

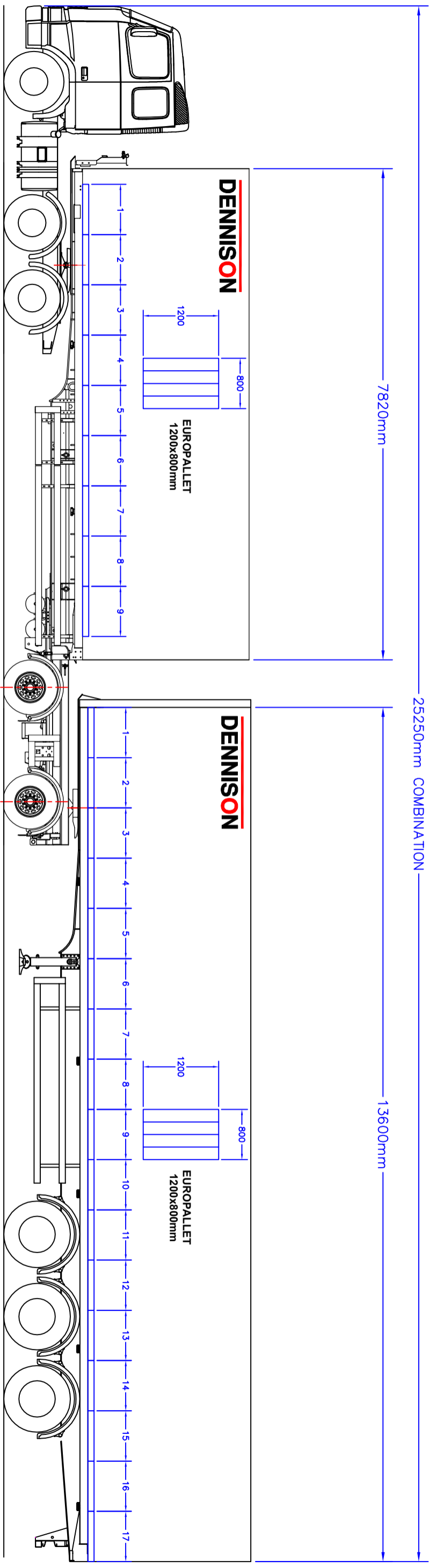
We have more than 8,000 assets across the UK and Ireland.



UK PALLET 1200x1000mm
LINK TRAILER = 14 PALLETS
STANDARD C'SIDER/BOX VAN = 26 PALLETS
TOTAL = 40 PALLETS
(14/26)100 = 54% INCREASE ABOVE STANDARD C'SIDER/BOX VAN 16.5m COMBINATION



EUROPALLET 1200x800mm
LINK TRAILER = 18 PALLETS
STANDARD C'SIDER/BOX VAN = 34 PALLETS
TOTAL = 52 PALLETS
(18/34)100 = 53% INCREASE ABOVE STANDARD C'SIDER/BOX VAN 16.5m COMBINATION



Department of Transport
2 Leeson Lane, Dublin
Email: haulagestrategy@transport.gov.ie

30 November 2022

Submission to the Second Public Consultation on Ten-year Strategy for the Haulage Sector

Dear Sir / Madam,

Ibec welcomes this opportunity to comment on the consultation published by the Department of Transport on Ireland's Road Haulage Strategy 2022–2031. Our members see the need for the establishment of national strategy for the sector. Ireland's economic wellbeing and the quality of life of people who live and work here are heavily dependent on the proper functioning of a dynamic and resilient freight transport network.

During last year's consultation, Ibec provided an extensive consultation response with a number of recommendations. We would like to thank the Department for incorporating majority of our key recommendations into the draft Strategy. Our recommendations have been developed in consultation with businesses across a wide range of sectors.

The Strategy reflects Government's awareness that addressing existing challenges requires a multi-layered, collaborative effort involving industry partners. We would like to offer some additional comments and recommendations which we believe are crucial in the successful implementation and functioning of the Strategy.

Key Recommendations

- The Strategy should continue to take account of customs and SPS issues affecting the sector, in conjunction with Revenue and relevant Government departments.
- The proposed Road Freight Forum should act as a preparation body for input to the Specialised Committee on Road Transport under the EU-UK Partnership Council.
- The Strategy should continue to take account of the unique geographical situation on the island of Ireland by ensuring provisions and rights for hauliers remain suitable.
- Ensure that the proposed EU Single Market Emergency Instrument (SMEI) meets and does not go beyond its stated aims to preserve the free movement of goods, services and persons and the availability of essential goods and services in the event of future emergencies.
- As noted in the Strategy, stakeholder engagement is critical to ensure the resilience of Ireland's supply chains and should continue to be supported. The DoT should expand the membership of the Road Freight Forum and Commercial Vehicle Operator Advisory Panel to industry representatives.

- Publish a clear roadmap for emissions reduction in the haulage sector.
- Provide financial supports and incentives for businesses who are looking to sustainably transition their fleets.
- Support investment in HVO production and use in Ireland.
- The RSA should receive further funding for the development and promotion of educational measures for professional drivers.
- Prioritise investment in critical infrastructure projects. Continued delays in the delivery of major national projects have added additional costs to hauliers at local levels.
- Develop quality road and rail infrastructure to link airports and ports to the national road and rail network. Accelerate the delivery of national digital infrastructure.
- The NTA should aid and guide local authorities on infrastructure planning and maintenance nationwide. The DoT in conjunction with Public Private Partnerships groups should support local authorities also.
- The DoT must take a more proactive role at European policy formulation level. The DoT should also assist and/or guide private enterprises in their own applications for European funding for the successful delivery of this Strategy.
- Establish sector specific working groups with industry and relevant Government departments to guide and inform the national position on incoming European legislation
- Provide more forums for industry feedback on the development of national training programmes for the sector.
- Government should allocate more funding to the DoT considering limited progress on policy files such as the 10 Year Haulage Strategy, National Ports Policy Review, Strategic Rail Review and National Aviation Policy throughout 2020-2022. The lack of timely progress on policy items under the DoT can have negative effects on the supply chain and delivery of national infrastructure.

1. Brexit and Covid-19

The draft Strategy correctly assesses that the delays in the initial post-Brexit period as a result of the introduction of new customs and sanitary and phytosanitary (SPS) checks at ports have been eased. Businesses have accustomed to the new requirements and have been able to adapt their supply chains, for the most part, to satisfy the rules of origin provisions of the EU-UK Trade and Cooperation Agreement (TCA).

The Strategy should continue to take account of customs and SPS issues affecting the sector and international traders in general, in conjunction with Revenue and relevant Government departments. In particular, the UK Government's gradual and fragmented introduction of new customs and SPS checks on imports to Great Britain is important for business. At present, IPAFFS pre-notification is not in place for imports of products of animal origin (POAO) from Ireland to Great Britain under the UK Government's SPS rules. However, it is in place for imports from the rest of the European Union (EU). Furthermore, the Welsh Government is considering introducing this requirement for imports of goods to Wales from the Republic of Ireland. The Strategy should include a commitment to coordinate with relevant Government departments and agencies to work with the UK Government to ensure adequate information and lead-time for business to adapt to the introduction of any new requirements.

It is welcome that the Strategy includes a proposal to establish a Road Freight Forum. This Forum should act as a preparation body for input to the Specialised Committee on Road Transport under the EU-UK Partnership Council. This Specialised Committee can play a crucial role in ensuring improvements and an evolution in EU-UK relations on road haulage to enable greater, and simplified access for Irish operators to Britain.

Business welcomes that the TCA takes account of the unique geographical situation on the island of Ireland, including for road transport by including special provisions to allow Northern Irish hauliers to perform two cabotage operations in Ireland. The Strategy should take account of the need for the EU and UK to work together to address any arising issues in the spirit of this mandate and in the ongoing implementation of the Protocol on Ireland and Northern Ireland.

Covid-19

Business welcomes the recognition in the draft Strategy, and at EU level, that there is a need to ensure the normal function of the single market in times of crises and to learn from the experience of the COVID-19 pandemic. With the Single Market Emergency Instrument (SMEI), the European Commission's stated aim is to preserve the free movement of goods, services and persons and the availability of essential goods and services in the event of future emergencies. As business, we welcome this ambition.

However, we are concerned that the SMEI proposal goes beyond these original objectives. The Commission's proposal addresses broader supply chain issues outside of times of crises, which requires a dedicated and careful approach. Furthermore, there is a lack of clarity surrounding key definitions. This includes the central point of when an event is considered a crisis as well as uncertainty about how the framework would be implemented in practical terms.

We believe that the proposal could have far-reaching implications on relations with the EU's external trading partners. Viewed in the context of other recently published measures (Data Act, Critical Raw Materials Act), the proposal is indicative of an EU that is increasingly inward-looking. As well as a smooth functioning single market, openness to trade and the ability to attract investment are among the EU's most powerful tools and are at the core of Europe's economic prosperity and competitiveness. It is imperative that all EU proposals take into account potential impacts on trade and investment.

The effectiveness and proportionality of measures, alongside the involvement of stakeholders in decision-making processes during both the vigilance and emergency phases, are key to ensuring a resilient single market.

Supply chains

Ibec welcomes the strong acknowledgement of the importance of the road haulage sector for enabling Ireland's supply chains and the Government measures put in place to support the functioning of Ireland's supply chains. Resilience of supply chains is key for Irish business and developing secure and diverse supply chains to safeguard competitiveness in global value chains is one of Ibec's key priorities in the Stronger Europe Stronger Ireland campaign. Business continues to be impacted by disruptions in transport and logistics and increasing costs as a result of COVID-19 and the war in Ukraine and require effective and efficient supply chains to minimise these disruption and costs. As noted in the Strategy, stakeholder engagement is critical to ensure the resilience of Ireland's supply chains and should continue to be supported.

2. Sustainability and Decarbonisation

Ibec welcomes the strategy's recognition of the immense challenges the road haulage sectors faces as it transitions to net zero. While there are emerging alternatives to diesel – there remains much technology and regulatory uncertainty in the sector. The cost differential is also prohibitive, and it will take some time for fully net zero solutions to become commercially available.

However, there is significant demand in industry for solutions to the road haulage carbon challenge. Increasingly, Irish firms are setting ambitious emission reduction targets. And transport related emissions can form a significant share of a firm's carbon footprint. For most firms, haulage emissions are counted as Scope 3 emissions i.e., they are indirectly created in upstream and downstream supply chains. For those involved in transport and logistics- haulage emissions are a front and centre problem and classed as Scope 1 emissions. In both instances, the demand for alternatives and solutions is high and growing fast.

The strategy provides good background material and context to the challenges the sector faces as it transitions to net zero. It also provides a useful overview of the different policy interventions and schemes across Government that are relevant to addressing this challenge. However, the draft strategy does not provide a clear roadmap for emissions reduction. A critical place to begin a decarbonisation roadmap is understanding the current state of play. However, the emission

associated with road haulage are never clearly quantified or identified. Much of the data presented and policies summarised relate to the transport sector as a whole. Page 34 of the draft strategy includes a chart presenting a potential decarbonisation pathway for the transport sector. This chart suggests that haulage emissions in 2018 were 3.17 MT CO₂eq with the potential to fall by 18.6% to 2.58 MT CO₂eq by 2030. Ibec seeks clarification that these numbers are correct and additional detail on the underlying assumptions.

Ibec welcomes the strategy's recognition that transition measures and an early focus on low hanging fruit will be needed until technology alternatives become commercially available. Ibec supports actions to improve logistical efficiency through reduced congestion, demand, eco driving, modal shift, and better integrated delivery services. Similarly, Ibec agrees that the consolidation of distribution centres and the interplay of zero-emitting LGVs and e-cargo bike solutions during the 'last-mile' could pay a significant role in reducing emissions and air pollution in urban areas.

Ibec welcomes the acknowledgment of the role rail freight can play in the transition and the decarbonisation of haulage. The next iteration of the strategy should account for actions in the strategic rail review which is due to be published in Q4 2022. Modal shift to rail freight provides a great opportunity to reduce emissions and congestion. A 2016 study by the UK's Department of Transport found that 'each tonne of freight transported by rail reduces carbon emissions by 76% compared to road and each freight train removes 43 to 76 lorries from the roads. Ireland's heavy rail network is underutilised. Rail freight only accounts for 0.4% of total freight tonnage in Ireland, compared to an EU 28 average of 17.4%. Ireland's heavy rail network is ideally suited to transporting ISO tanks, containers, bulk freight materials like mineral ores, biomass, and timber. The lines between Ballina and Dublin Port, and Waterford Port give a direct connection with maritime traffic.

Ibec welcomes the support for both the Low Emission Vehicle Toll Incentive or 'LEVTI' Scheme and the Alternative Fuels Heavy Duty Vehicle Grant Scheme. Ibec agrees that the latter merits a scaling up to meeting growing demand for low/zero carbon alternatives. Financial supports and incentives will continue to play a vital role in encouraging businesses to transition their fleet- especially during this period of regulatory and investment uncertainty.

Ibec welcomes the strategy's recognition of the vital role biofuel blending plays in the decarbonisation of the transport sector. Renewable biofuels remain the main driver of transport decarbonisation in our economy today and an obvious solution for hard to mitigate sectors like road freight. The Biofuel Obligation Scheme has proved to be a great success, removing millions of litres of petrol and diesel from the market each year, largely unnoticed by end consumers. Like with centralised district heating, the appeal of biofuels is that they offer a relatively low resistance path to decarbonisation without relying on large volumes of individual consumer decisions or investments. However, the sector is approaching technical limits as the blending obligation increases. There is an opportunity for Ireland to produce/use more advanced biofuels that do not face the same technical barriers as Fatty Acid Methyl Ester (FAME). These include Hydrotreated Vegetable Oil (HVO) or Hydrotreated Renewable Diesel (HDRD). The deployment of such fuels requires strong investment signals from Government that there will be a market for such fuels in the medium to long term. The An Post case study for HVO shows the immense potential for advanced biofuels in the haulage sectors. Ibec supports efforts to support investment in HVO production and use in Ireland.

Circular Economy

Ibec conducted a number of sector specific Circular Economy workshops in conjunction with DECC and EPA throughout 2021-2022. Results of these workshops showcased the need for tackling the linear to circular education gap for enterprises. Both the DoT and DECC have a responsibility of supporting the sector in its circular transition.

Ibec would like to draw the DoT's attention to the volume of circular legislation currently developed at European level. A proactive engagement is necessary in fair legislative transposition down the line.

3. Road Infrastructure and User Charging

Considering that 99% of freight within Ireland is transported by road, increased provision should be made to support the maintenance and development of national road networks and lifeline roads. Projected HGV traffic maps for 2030 in the document, show the expected growth in HGV traffic across the country. Sufficient funding should be made available to improve and to implement substantial works on the existing national road network incorporating national, regional, and local roads. Delivery timelines for all projects should be reduced by up to 50%.

Ibec has continued to highlight across our campaigns and submissions that Ireland requires urgent transformative changes to our transport system. Investment and delivery are key. By supporting the development of regional infrastructure, the Government has an opportunity to support just regional transition and make our national supply chain more resilient.

The DoT in conjunction with Public Private Partnerships groups should aid and guide local authorities in the design, delivery, maintenance and upgrades of urban and remote sections of dual carriageway, national secondary, regional, and local roads. Action points 18¹, 19², 20 and 21³ are welcomed.

Ancillary road infrastructure

The DoT has rightly identified the need for ancillary road infrastructure such as rest stops, safe and secure parking areas and refuelling/charging points. Those working in the haulage industry do not always have access to basic facilities.

Ibec supports the Commission proposal⁴ of transposing Safe and Secure Parking Areas (SSPAs) on the Core and Comprehensive TEN-T network, with a maximum distance of 100 km between each area. If

¹ ACTION 18 – Ensure the infrastructure strategy for the national road network, National Roads 2040, takes account of the needs to the Haulage sector.

² ACTION 19 - Advance Better Road User Charging Evaluation (BRUCE) - Draft implementation plan by Q2 2023

³ ACTION 20 - Map the current infrastructure available to haulage and freight including rests stops and refuelling stations and identify priority projects for advancement and explore potential for CEF Funding.

⁴ European Commission established an Expert Group on Safe & Secure Parking Areas for Trucks who recommended that SSPAs should be rolled out across the Core and Comprehensive TEN-T network

the proposal is included in the revised network, the Government should apply for MS based funding for the development of SSPAs infrastructure. The DoT should assist and/or guide private service station operators in their own applications for European funding also. All transport workers should have access to basic sanitary facilities, and Government should support accordingly.

Intelligent Transport Systems

Integration of Intelligent Transport Systems (ITS) with our existing infrastructure must become a norm. The deployment of existing ITS technology by TII as part of the enhanced Motorway Operations Services programme is necessary in mitigating the adverse effects of future traffic growth. The Government should support TII adequately in expanding the use of ITS technology.

Ibec would like to draw DoT's attention to the recent news at European level regarding the ITS Directive. Following the plenary sitting of the European Parliament earlier in November, the [report](#) on the rules for the deployment of intelligent transport systems and for interfaces with other modes of transport (ITS Directive) by rapporteur Rovana Plumb (S&D) was adopted. The new rules aim to update the existing ITS Directive to boost digitalisation in the transport sector and ensure wider data sharing. Ibec expects the DoT to actively follow and engage with the ITS revision as it enters interinstitutional negotiations.

TEN-T

It is crucial that the ambitions in the framework of the TEN-T meet the ones set out in the European Green Deal. The TEN-T is an important enabler for multi-modality in transport and logistics in the EU as well as for efficient and sustainable transport and mobility solutions. As the Council is expected to adopt the general approach during the TTE Council meeting on 5 December - the DoT should be proactive at engaging with TEN-T. Ibec would like to draw the attention of the DoT to particular TEN-T provisions, such as high-speed rail, and consider how will the revised TEN-T be transposed in Ireland if one is to consider that existing rail network in Ireland cannot currently operate high-speed trains.

For TEN-T to achieve the defined objectives – sustainability, cohesion, efficiency and increasing benefits for users, the TEN-T Regulation must be ambitious. Therefore, it is essential that the Council approach for the TEN-T Regulation supports a higher level of ambition for its implementation, design and financing, without undermining the ambitious objectives set out in the Commission proposal.

Ibec supports the overall scope and objectives as defined in the Commission's proposal. We would like to draw DoT's attention to points raised by our associated Confederation of European Business, *BusinessEurope*, in their most recent communication to the Chair of the EU Transport, Telecommunications and Energy Council - Mr. Martin Kupka, Minister of Transport of Czech Republic.

To this end, the following aspects are matters of concern and should be under consideration by the DoT and relevant Perm Rep lead:

- The current Commission proposal for the TEN-T Regulation does not sufficiently address the challenges related to safe and secure parking and rest areas for trucks. The implementation date of

the proposal set to 31 December 2050 is insufficient and hardly leading to any immediate improvements for drivers in the road haulage industry. A higher level of ambition is necessary to ensure that the provisions of the Mobility Package are observed.

- Coordinators of the TEN-T corridors should be given effective powers to implement the agreed TEN-T plans as well as resources needed to monitor the necessary cost-benefit analyses. In this context, it is crucial that the dialogue with industry is upheld and means to fulfil requirements imposed on businesses are provided.
- It is imperative that ambitions in the framework of the TEN-T Regulation go hand in hand with sufficient funding at EU and national level to fill in existing investment gaps, ensure development and maintenance of the core infrastructure and guarantee timely completion of the TEN-T networks.
- The business sector supports the creation of an interoperable European high-speed network, urging that the TEN-T policy must support the ambitious targets in terms of high-speed network as set out in the Smart and Sustainable Mobility Strategy. Moreover, the sector deems the time mature for a European High Speed Master Plan connecting urban nodes and airports and supporting the development of international passenger services.
- Adaptation between the proposals for TEN-T and AFIR is necessary to ensure that sufficiently ambitious binding targets are in place for the minimum number of charging stations at each safe and secure parking and rest area by December 2030.

4. Integrated Transport Planning & Intermodal Transport

The Strategy considers transport network planning at the national, regional, and local levels. This is welcomed. Action points in this section are well identified but could be expanded. Road freight sector and its importance for Ireland must be considered as part of all transport strategy documents.

Our submissions to the NPF, the RSEs, the Mid-Term Review of the NDP and MATS all acknowledge the potential of intermodal transport as a core component of improved national and inter-regional connectivity. The MATSs and RSEs should show clear alignment with NDP, NIFTI, NPF, Local Transport Plans (LTPs), Area Based Transport Assessment (ABTA) and local County Council development plans. The NTA should also develop HGV Management Strategies for remaining national metropolitan areas: Cork, Galway, Limerick and Waterford as proposed under Action 23.

The NTA has a role to play when it comes down to engaging and supporting local government authorities. The DoT should support local authorities in conjunction with the NTA in having an integrated approach to nation-wide transport planning.

Rail Network

The delivery of Strategic Rail Review and Rail Freight 2040 underpins the success of utilising the national rail network to its full potential. The completion of the Strategic Rail review should not be delayed any further. The DoT is right in considering future strategic use of rail network for freight as a result of the Review.

Ibec supports Irish Rail in its consideration for examining the feasibility of rail services to the port facilities at Marino Point and reinstating the rail line connection at Foynes. Upgrades on key inter-city rail routes, including Dublin-Belfast, Limerick Colbert to Limerick Junction and Athenry-Galway are needed.

Ports Policy & Digitalisation

Action 24⁵ is well identified as the review of the National Ports Policy is required immediately. The functionality of our ports is essential for our national supply chain. The revised TEN-T regulation currently contains a requirement for all Tier 1 ports to be connected to the rail network.

Quality road and rail infrastructure must be available to link airports and ports to the national road and rail network. It is vital that hauliers can access ports and airports in a timely manner from anywhere in the country. Before Dublin Port reaches its ultimate capacity, the Government must ensure that the national port system has sufficient capacity to manage the spill over from Dublin in the coming years.

Intermodality requires smooth interconnection between modes and technology. Existing and in development systems, such as Port Community Systems, Port Terminal Management System and SmartGate technology should be supported by Government funding on ongoing basis. Through the establishment of digital infrastructure and learning platforms, policymakers and regulators can gain a better understanding of the challenges regularly faced by the haulage industry.

Airports

The review of the National Aviation Policy should not be delayed any longer. The vast majority of air freight is currently handled at Dublin Airport. Ibec also understands that Shannon Airport envisages a substantial uplift in cargo volumes, with implications for its connectivity to the national road network. Future planning on the movement of goods must provide access to national airports.

National planning frameworks should address the logistical challenges for inbound and outbound transport of freight by air. Any night-time restriction could indirectly impact on the movement of goods to and from the airports, in that the collection or delivery times would be more concentrated during peak traffic hours. The runway movements at Dublin Airport need to be maintained following the completion of the North Runway.

5. Road Safety

Ibec welcomes the Department of Public Expenditure and Reform decision in approving the recruitment by the RSA of an additional 36 enforcement staff. Government has a responsibility of adequately supporting the RSA at ongoing basis.

⁵ ACTION 24 – 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.

The RSA should receive regular funding for the development and promotion of educational measures for professional drivers. The importance of good mental health and well-being for drivers is essential and should underpin existing and in development training programmes.

To ensure that Driver CPC remains effective and fit for purpose, the DoT is right in acknowledging that reform is needed. Ibec encourages the DoT and Department of Further and Higher Education, Research, Innovation and Science to work with hauliers and freight forwarders to gain invaluable input which can assist in the much-needed CPC reform. Any changes to existing CPC must be communicated to industry in a clear time appropriate manner.

The DoT should expand the membership of the Commercial Vehicle Operator Advisory Panel to more industry representatives as the group will review and make recommendations on enforcement and compliance issues.

6. The EU Mobility Package

As noted by the Strategy, feedback received as part of the public consultation 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.

Further activity is required not only at European level but on national level also. Ibec again urges the DoT to establish a dedicated communication channel with hauliers for EU legislative matters to keep industry members up-to-date and to gather regular feedback for relevant EU consultations. It was noted in the Strategy⁶ that the DoT will maintain engagement with stakeholders to represent Ireland's interests on EU files. More concrete engagement structures are required at part of the finalized Strategy. The establishment of such a channel would strengthen Ireland's contributions and foster a greater sense of cross European cooperation via informed national channels.

Mobility Package 1

The Mobility package brought on separate pieces of legislation⁷ which focused on the functioning of the road transport market, the working conditions of drivers and licencing. The DoT is right in wanting to provide information for operators on new EU rules. Communication underpins effective implementation.

Ibec has previously recommended that Government allocates more investment for upgrading and developing national IT infrastructure to support the sector. For example, Regulation 2020/1054 provides for the mandatory introduction of an updated tachograph technology, known as Smart Tachograph 2. There has not been substantial external support to aid enterprises in the required transition as a result of the Mobility Package.

⁶ ACTION 30 – Continue to take an active role in negotiations shaping EU Transport Legislation.

⁷ REGULATION (EU) 2020/1054 (amended EU legislation on driver hours), REGULATION (EU) 2020/1055 (amended EU legislation on road operator licencing), Directive (EU) 2020/1057 (the posting of workers in the road transport sector)

The sector is under increased legislative scrutiny as sustainable practices have been at the heart of policy at all levels. Just transition takes time and requires patience and understanding at all levels. The finalized Strategy must acknowledge the scale of supports required and be proactive in providing information and funding application assistance.

Membership of the proposed Road Freight Forum should be extended to enterprise groups considering that the DoT will keep the proposed 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*. Considering the existing level of involvement and influence at European level, enterprise representative bodies, such as Ibec, need to be included.

7. Labour Market & Skills

Ibec membership have identified the skills gap as a priority issue. The ongoing work of the Logistics and Supply Chain Skills Group (LSCSG) is commendable and Ibec would like to thank the DoT for the recent inclusion on the group.

Items identified by the LSCSG recommendations report aimed at improving the supply issue must be implemented. LSCSG also published two [Information](#) Notes aimed at increasing the number of professional HGV drivers in Ireland. It also published a comprehensive overview of existing education and training provisions in logistics and supply chain. The DoT should allocate more resources to promote LSCSG publications and activities. The inaugural skills week for the sector is scheduled for spring 2023 and Ibec will continue to work closely with the LSCSG in making the skills week a nationwide success.

As stated in our previous submission, the haulage industry is perceived as male dominated and unsuitable for women. Government must change the perception by changing the reality. Establishing research workstreams on attractiveness of the industry under Action 33 is plausible but more needs to be done. Legislation, educational and media wide campaigns are needed.

Ibec noted that HGV drivers and HGV mechanics may not constitute critical skills within the Department of Enterprise framework, but there is a dangerous shortage of these skills. The DoT should therefore consider a further increase in the ceiling of non-EU nationals. The quota basis overall needs to be improved. The DoT needs to focus its efforts on developing both short-term and long-term solutions.

Additional driving licence exchange agreements are only a short-term solution to a much wider problem. If the DoT were to examine the current economic realities it might acknowledge the possible difficulties in retaining overseas workforce. The progress on Ukrainian drivers' licences has been slow and if not for EU measures coming in July 2022 the issue would not have been resolved as fast.

The cost associated with the training and licensing of an HGV driver in Ireland is putting financial strains on businesses and discourages the young workforce from pursuing a career in the sector. The DoT could engage more proactively on the insurance cost conversation.

Ibec welcomes the extended number of new educational programmes in logistics and supply chain, apprenticeships and traineeships, in partnership with industry stakeholders, at several third-level educational institutions. In particular the Transport Operations and Commercial Driving Apprenticeship launched in May 2022. The DoT should establish more forums for industry feedback on the development of such training programmes. The need for high-quality apprenticeships for the economy is clear, and broadening apprenticeships for the haulage sector requires immediate attention. Ibec noted a list of recommendations relating to apprenticeships in our previous submission and would like the DoT to acknowledge these in their finalized Strategy.

I would be happy to discuss the foregoing points further if this would be helpful.

Yours sincerely,

Klaudia Dudzińska

Infrastructure, Transport and Environment Policy Executive, Ibec



Indaver Response : Ten Year Strategy for the Haulage Sector November 2022

This response is primarily focused on hydrogen derived from waste and its application within the Haulage Sector. In early 2022, Indaver Meath Waste to Energy received planning permission for a 10MWe electrolyser at Meath Waste to Energy (WtE). The hydrogen produced can be used for mobility refueling, injection to the gas grid and supplied for use in the chemical industry. In the short to medium term, hydrogen mobility is a key route to market for the development of this hydrogen production infrastructure.

Indaver welcomes this consultation, as well as the opportunity to be contributors of green hydrogen within the mobility sector.

Indaver supports the consultation's invaluable consideration of EU Emissions targets in this strategy. These are included in Fit for 55, and specifically, the Alternative Fuels Infrastructure Regulation. The deployment of electric vehicles recharging and hydrogen refueling infrastructure for heavy duty vehicles should be prioritized in this proposed legislation. Member states will have an obligation to update national policy frameworks on the use of alternative fuels in transport by 2025, supporting decarbonization of the sector.

National Policies also support these European initiatives, such as the Climate Action Plan (2021). It is important to consider overseas examples that may benefit Ireland such as certain freight decarbonization technologies trialed across Europe.

To achieve this, we acknowledge a need for investment in infrastructure, specifically refueling, as it is not currently sufficiently developed - energy applications and supply in early years will be relatively expensive and have difficulty competing without governmental intervention such as legislative support, tax exemptions, subsidies or capital grants.

The Department of Environment, Climate and Communications' publication of a Hydrogen strategy will support hydrogen mobility in the sector. Indaver welcomes the Department of Transport's support



for hydrogen expansion, included hydrogen vehicles in an Alternatively Fueled Heavy - Duty Vehicle (AFHDV) purchase grant, complemented by an accelerated capital allowance (ACA) tax incentive for purchasers of hydrogen vehicles and refueling equipment.

From 2023, as set out in Renewable Fuels for Transport Policy Statement (RFFTPS), fuels suppliers can offset their biofuel obligation with green hydrogen receiving four times credit. Indaver believes this is a critical step in making green hydrogen competitive against fossil fuels.

Regarding the Government's Shared Island initiative, we believe that this all-island approach is important to keep in mind. Commissioned research on potential for cross-border cooperation will help implement hydrogen refueling infrastructure. The first part is underway, involving the assessment of necessary safety regulations and infrastructure. The second phase is set to begin next year, looking at the delivery of transport refueling on a cross-border basis and investigating optimizing use and location. We believe this is an important balance of long and short term management and look forward to seeing how the next phases will support hydrogen rollout in the mobility sector.

In summary, a number of issues still need to be progressed in order for Indaver to install an electrolyser at Meath Waste to Energy and begin hydrogen production. These include:

- Clarity on the **categorisation** of electrolytic hydrogen from biomass and non-biogenic waste.
- Understanding on the relevant **regulatory** regime and **applicable safety framework** and interaction with existing licensing arrangements.
- A **support mechanism** is necessary to overcome the disadvantages associated with early investment in hydrogen production and the associated infrastructure.
- A **route to market** and incentives for prospective users of hydrogen.



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Submission to Public Consultation on Ireland's Road Haulage Strategy 2022-2031

November 2022

Introduction

The Irish Congress of Trade Unions (ICTU) is the representative confederation for trade unions in the Republic of Ireland and in Northern Ireland. Affiliated unions have a total membership of over 700,000, working across every sector of the economy, including road haulage. We welcome the opportunity to set out our views on the draft *Road Haulage Strategy 2022-2031*.

In summary, we believe the draft strategy does not comprehensively or adequately address the issue of working conditions in this sector and consequently it will not achieve what is clearly one of its principal objectives – resolving ‘the long-standing labour shortage and skills gap in the industry with a particular acute shortage of HGV drivers’ (p.21).

This submission sets out our views as to why we believe this to be the case and how we believe it can be resolved by promoting social dialogue and collective bargaining between the social partners in this sector. ICTU would be willing and keen to engage further with government and other stakeholders on this before the final strategy is adopted.

Inadequate Consideration of Working Conditions

We note and welcome that the draft strategy acknowledges (p.14) that UN Sustainable Development Goals (SDGs) that ‘have a particular relevance for road haulage and freight’ include SDG 5 *Gender Equality* and SDG 8 *Decent Work and Economic Growth*.¹

However, in our view the consideration of working conditions in the draft strategy - in sections 7.6 and 7.7 and resulting Actions 29, 32 and 33 mainly - does not comprehensively or adequately address the range of issues encompassed by the decent work aspects² of these SDGs in relation to this sector.

We would firstly take issue with the premise in the introduction (p.13) that:

¹ SDG 5 - Achieve gender equality and empower all women and girls. SDG 8 - Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

² Sub-targets under SDG 8 include: ‘By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value’ (Target 8.5); and ‘Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment’ (Target 8.8).

‘...recent changes to EU regulations have sought to address *social, employment* and competition issues which have presented challenges in the Continent ‘*which do not exist to the same degree in an Irish context*’. (emphasis added).

We would draw attention to the fact that that the Expert Group on Future Skills Needs 2018 report on the implications of Brexit (discussed in section 7.7) had stated that:

‘Feedback from the 2015 study for the Expert Group on Future Skills Needs found that there was a view that not all freight operators in Ireland (specifically road freight operators) were always operating within the boundaries of the law. It was stated that other established EU road haulage markets were more compliant with regulation than those in Ireland.’ (Expert Group on Future Skills Needs, 2018:59)

Concerns about the transport sector as a whole are also shared by state agencies and departments tasked with ensuring compliance with social and employment legislation. The Comptroller and Auditor General for example has previously drawn attention to the fact that the transport sector has been the focus of compliance activity by the Joint Investigations Unit involving officials from the Department of Social Protection, Revenue and the Workplace Relations Commission investigating social welfare fraud, tax non-compliance and breaches of employment law (Comptroller and Auditor General, 2017).

Table 1 below sets out the data on Workplace Relations Commission (WRC) inspection activity and outcomes in the transport sector over the five years to 2021. While this data does not indicate how much of this inspection activity concerned the haulage sector, it cannot be assumed that none concerns this particular sector.

Table 1 – WRC inspection activity and outcomes in transport sector

Year	Cases	No. in breach	Incidence of breach	Employees	Unpaid wages
2021	60	21	35%	549	€5,510
2020	87	28	32%	n/a	€23,314
2019 ³	64	40	63%	2,152	€200,430
2018	71	43	61%	3,860	€141,040
2017	61	29	48%	1,576	€168,125

Source – WRC annual reports 2017-2021.

In our view, the draft strategy does not adequately address non-compliance concerns. Section 7.6 *The EU Mobility Package*, and resulting Action 29, *Implement the EU Mobility Package*, merely states that, ‘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’ (p.82), and that Directive (EU) 2020/1057 on the posting of workers in the road transport sector, ‘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’ (p.84), and that the Road Safety Authority ‘is responsible for driver hours enforcement and the Workplace Relations Commission is responsible for employment rights’ (p.83).

We note that the draft strategy does not acknowledge that the European Commission opened infringement proceedings against Ireland in 2018 for alleged non-conformity of Irish legislation with Directive 2014/67/EU on the enforcement of Directive 96/71/EC concerning the posting of workers⁴, and does not explicitly acknowledge that Ireland failed to transpose Directive (EU) 2020/1057 on the posting of workers in the road transport sector, which comes within the responsibility of the Department of Transport⁵, by the agreed February 2022 deadline, and that the European Commission opened infringement proceedings against Ireland on this matter in 2022⁶.

³ Covers *transportation and storage* in 2019.

⁴ European Commission reference INFR(2018)2235.

⁵ Answer to Dáil written question no.22336/2022, 4 May 2022.

⁶ European Commission reference INFR(2022)0229. The draft strategy merely states that, ‘It is anticipated that Mobility Package 1 and the aligned TCA elements will be transposed into Irish law by the end of 2022/early 2023.’ (P.85)

With regard to section 7.7 *Labour Market & Skills*, the draft strategy states that 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’ (p.92). It indicates that this is to be done through Action 32, whereby the Logistics and Supply Chain Group (LSCSG) ‘will continue its work to promote careers in logistics and supply chain and will continue to monitor the implementation of the Recommendations on HGV Driver Shortage’, and Action 33, whereby the LSCSG ‘will *look to establish research workstreams* on attractiveness of the industry – improving gender balance and diversity, improving working conditions and work/life balance.’ The final strategy needs to go well beyond ‘looking to establish research workstreams’ on these issues.

The LSCSG’s recommendations on HGV driver shortage, and specifically its short-term recommendations concerning working conditions, are limited to engaging with Transport Infrastructure Ireland concerning facilities for HGV drivers on the motorway network; to engaging with the Inter-Departmental Cost of Insurance Working Group in relation to insurance premiums for young HGV drivers; and to ‘continue consideration of driver wellbeing and lifestyle issues’, while its medium-to long-term recommendations are limited to completing ‘the 10-year Haulage Strategy, including a section on labour market and skills issues’.

The consideration of working conditions falls short of the emphasis on these issues in some of the submissions made in the first public consultation in 2021, particularly those from the Road Safety Authority, the Forest Industry Transport Group, and Freight Transport Association of Ireland. We would highlight the RSA’s commentary that:

‘The RSA does have concerns that driver shortages has the potential to put further pressures on the available drivers to get more done in less time. The temptation for some is to make up for lack of drivers by cutting corners, working longer, reducing safety margins, driving faster than is safe, breaching road traffic rules: all of these have an impact on road safety risk, working conditions and ultimately on the well-being and safety of HGV drivers and the wider public.’

The RSA accordingly recommended that measures to address the driver shortage problem could include increasing ‘driver pay and offering incentive packages’ and retaining talent by ‘stimulating improved working conditions’ (RSA, 2021).

The proposed actions also fall short of what is needed as acknowledged in other documents referenced in the draft strategy. For example, the 2018 report of the Expert Group on Future Skills Needs acknowledged in relation to road freight transport that:

‘The requirement to work away, coupled with relatively low pay and the need to undertake extensive training (potentially costing €5,000-€10,000) to get a licence are all barriers to attracting individuals into the sector’.

Furthermore, the draft strategy quotes from the 2020 ITF *Gender Dimension of the Transport Workforce* that, ‘Both attracting and retaining women remains a challenge for governments and the private sector’ but it should be noted that the report went on to say that ‘Achieving a more diverse and inclusive transport-sector workforce requires actions from government, the private sector *and unions*’, and also warned that the decline in the participation of women in the transport workforce, observed in some of the countries studied for the report, will ‘especially be the case if policies to improve working conditions and support the elimination of gender stereotyping are not implemented’ (Ng, WS and A. Acker, 2020).

Finally, the European Commission’s 2020 communication *Sustainable and Smart Mobility Strategy* (pages 88-89), acknowledged the need to improve working conditions in the transport sector:

‘The sector’s most valuable asset by far is its people and the sustainable and smart transition will not be possible without the support and buy-in of transport workers. However, certain parts of the transport sector often suffer from harsh working conditions. Precarious working conditions, including long working hours, periods spent away from home and low paid work, are exacerbated by a lack of respect for, and proper enforcement of, applicable labour standards. Providing higher social standards would contribute directly to reverse the current general lack of attractiveness of the sector. The workforce is rapidly ageing and significant shortages of labour force are already very visible in certain occupations. The issues faced by the transport workers have been exacerbated by the COVID-19 pandemic. This situation risks deteriorating further if no action is taken. This is why the Commission will consider measures across the different modes of transport to strengthen the legislative framework on conditions for workers, and ensure the correct implementation and give more clarity on the

applicable social rights in line with the various instruments available to implement the European Pillar of Social Rights.’⁷

Conclusion

One of the main conclusions of the 2017 study for the European Parliament’s Transport Committee on *Road Transport Hauliers in the EU: Social and Employment Conditions* was that:

‘There is a widespread and shared agreement between stakeholders (not only trade unions, but also associations of transport companies) and drivers about the fact that the road freight transport sector has, for several years, been experiencing a deterioration of its working environment.’ (TRT, 2017)

We acknowledge and welcome the consideration of a number of issues concerning working conditions in the draft strategy but we do not believe that the text as a whole comprehensively or adequately considers working conditions in this sector nor sets out the necessary actions to improve these in the years ahead. This omission therefore undermines the prospects of achieving what is clearly one of its principal objectives - resolving ‘the long-standing labour shortage and skills gap in the industry with a particular acute shortage of HGV drivers’.

The most appropriate way of addressing these issues is by the final strategy promoting social dialogue and collective bargaining between the social partners in this sector. This would be in line with Ireland’s international commitments and forthcoming national legislation. This would contribute to achieving the strategy’s objectives. As the 2020 ITF report states, ‘the presence of women in the collective bargaining process is important to achieving outcomes that benefit women and can help in shaping hiring and retaining strategies.’ (Ng, WS and A. Acker, 2020:9).

ICTU would be willing and keen to engage further with Government and other stakeholders before the final strategy is agreed.

ENDS

⁷ Principle 8 states: The social partners shall be consulted on the design and implementation of economic, employment and social policies according to national practices. They shall be encouraged to negotiate and conclude collective agreements in matters relevant to them, while respecting their autonomy and the right to collective action.

References

Comptroller and Auditor General (2017), Report on the Accounts of the Public Services 2017.

European Commission (2020) Sustainable and Smart Mobility Strategy – putting European transport on track for the future (COM(2020) 789 final, 9.12.2020).

Expert Group on Future Skills Needs (2018), Addressing the Skills Needs Arising from the Potential Trade Implications of Brexit.

Ng, WS and A. Acker (2020), “The Gender Dimension of the Transport Workforce”, International Transport Forum Discussion Papers, No. 2020/11, OECD Publishing, Paris.

Road Safety Authority (2021), 10-year Strategy for the Haulage Sector – 1st Consultation Document Road Safety Authority’s Response.

TRT Trasporti e Territorio, 2017, Research for TRAN Committee – Road Transport Hauliers in the EU: Social and Working Conditions (Update of the 2013 study), European Parliament, Policy Department for Structural and Cohesion Policies, Brussels.

IEA Submission: Second Public Consultation on Ten Year Strategy for the Haulage Sector

Irish Exporters Association submission to the Department of Transport
29 November 2022

The Irish Exporters Association

The Irish Exporters Association (IEA) is the leading independent representative body and voice for exporters based in Ireland. The IEA represents exporters and supply chain operators across the country and works at regional, national, and European level, representing its members in front of legislators to create a regulatory and legislative framework that supports, drives, and fosters Irish exports.

We assist our members to grow their exports to world markets and drive the growth and development of all exporting businesses based in Ireland. We provide a set of highly relevant business services and products to assist our members with international trade.

The IEA represents the whole spectrum of companies within the export industry including SME's who are beginning to think about exporting for the first time right through to global multinational companies who are already extensively exporting from Ireland as well as the providers of key services to the sector. The IEA is the connecting force for Irish exporters, providing practical knowledge and support across the Island of Ireland and in foreign markets.

Overview:

The Irish Exporters Association welcomes the opportunity to respond to the Department of Transport's draft Road Haulage Strategy for 2022-2031. Ireland, as an island nation, is heavily reliant on its domestic and international road haulage sector, owing to its crucial role in the economy. The movement of nearly all products and goods require at minimum some element of road haulage within wider multi-modal supply chains, which also include sea, air, and rail freight. The haulage and road freight sectors are key employers in communities across Ireland and make a significant contribution to the economy – bringing goods into Ireland, as well as supporting Irish exports.

The IEA welcomes the introduction of the first dedicated strategy for the road haulage sector. Through Brexit, COVID-19 and the war in Ukraine, the sector has shown its importance as the 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. The sector faces long standing challenges, as we expressed in our first [submission](#) to the Road Haulage Strategy.

There is a shortage of HGV drivers both in Ireland and internationally, coupled with a skills shortage in the wider logistics and supply chain sector. While a number of large logistics companies operate in Ireland, the majority of licensed haulage companies in Ireland are made up of smaller operators, many of which are family businesses. These smaller haulage businesses currently operate in a very competitive environment with tight margins on operating profits, and with limited

degrees of bargaining power in relation to the rates they can charge to much larger client companies.

The IEA recommend an increase in better marketed training and education opportunities for those engaged in road haulage activities, to help towards current skills shortages and recruitment difficulties. To make it more attractive to potential entrants, a route to greater career mobility linked with specific career paths developed within international trade and supply chains operators as well as other sectors that the drivers touch. We must enhance the viability, visibility, and availability of career opportunities in this sector. The HGV driver shortage is a global issue. Demand for road freight transport is increasing, while at the same time, more HGV drivers are exiting the industry than entering it.

We note the work done by Government in supporting the recruitment of drivers from multiple third country States, but this will only solve part of the labour market gap. Foreign recruitment is not devoid of challenges, and it is unlikely to be able to cover the shortfall in drivers in the long term. Hence, 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.

The Irish Exporters Association echoes the ethos of the EU Commission's [Pact for Skills](#) initiative for a more sustainable and resilient economy. This year, the IEA launched the [Institute for Sustainable Trade](#) – a new professional membership and education body offering education, networking, and professional development opportunities to international trade professionals, with a focus on preparing for a more sustainable future by upskilling people in the industry to face the challenges that will arise. The creation of the IST came in response to the direct need for new educational programmes for professionals working in the logistics and supply chain sectors as well as internationally trading companies

Addressing the shortage of Heavy Goods Vehicle drivers is a critical issue. We welcome Minister Naughton's and the Department of Transport's continued efforts to tackle the issue. We value our membership of the Department's National Logistics and Supply Chain Skills Group. The work of the group is extremely important for our members, of which the logistics and transport sectors remains an active and vital part of our membership.

Conclusion:

The Irish Exporters Association would like to thank the Department of Transport for the opportunity to feed into its Road Haulage Strategy. The IEA has actively and constructively worked with the department and stands ready to continue this engagement. We will continue to advocate in the interest of Irish exporters and importers and the wider business community and look forward to reading the full strategy when published.

On behalf of the IEA,

Simon McKeever

Chief Executive

DATE: 29.11.22

Brendan Meighan (Transport)

From: Paula Monagle <[REDACTED]>
Sent: Thursday 6 April 2023 16:24
To: Brendan Meighan (Transport)
Subject: FW: IRHA Submission to second public consultation on Road Haulage Strategy

Importance: High

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Hi Brendan,

Below is the second submission made by the IRHA to the 2nd draft of the Road Haulage Strategy.

PAGE 31 Quote

"Even with the impact of covid 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% of road transport emissions."

Yet in the document there is no reference to getting these cars off the road through an improved public transport system, including better use of our Rail Network. Rail is only referenced (Page 72) in the context of removing HGV's off the road putting our critical supply chain at the mercy of a Semi State body, where history shows the private sector as delivering for the Country and not such a State based approach, which is at best anti private enterprise and at worst a risk to our supply chains. Please see our submission points on this topic.

- Numerous international studies cite 300km as being the distance by rail required to justify moving freight from road when the additional handling required at both ends is considered, within this modal shift.
- Due to a lack of investment to date in the rail system, we have no rail links to ANY industrial bases, thereby requiring all freight movements by rail to involve an element of road transport.
- It is of note that EU funded rail freight infrastructure (including Aumund container gantries) installed in the late 1990s to provide container handling infrastructure was systematically scrapped by Irish Rail. Irish Rail have demonstrated little real appetite or strategic intent to support rail freight or to facilitate connection between rail freight and road transport.
- Currently, for all road freight going from A to B, the truck most often carries a backload to point B or C/D/E/F on its route home, or could do a triangular movement of 3 loads. Rail freight does not offer this flexibility thereby possibly increasing the cost of some current road movements as less loads are available, thereby making the road freight system less efficient.
- The Irish road freight system is privately owned and run, delivering a 24/7 service to all industries within and without Ireland, thereby enabling the Irish economy to function. The work practices of the current rail operators in Ireland do not align very well with the operational efficiencies and output of the road freight system. To try to link one freight mode with the other is to make our current road freight model less efficient, possibly increasing total transport costs to many of our current customers and industries. It has also to be said that the historic control of Ireland's transport industry by CIE with State support, not only distorted the market, but it has for years stymied the development of the private transport industry. The industry thankfully overcame these obstacles helped by our membership of the EEC and its competition laws. To witness an increasing control or influence on the transport sector by CIE/Ianrod Eireann considering their financial performance, their poor track record on efficiency, delivery of service and value for money, would be an issue of concern to the IRHA.

This approach as a decarbonisation pursuit will be a further cost to the State, as it will be State monies that Irish Rail will have to receive, along with EV infrastructure, Hydrogen infrastructure and Project Causeway making any decarbonisation a slow, very expensive, unwieldy and complex process.

PAGE 34 Quote

"Technology improvements in the HGV fleet will deliver a 10% reduction in tail-pipe emissions per kilometre from this fleet between 2019 and 2030 – predominantly from reduced fuel consumption and/or increased fuel efficiency."

This is an extraordinary statement, which is way off the documented reality both from our submissions and EU reports and regulation. If the National Fleet was supported to transition to 100% Euro VI, a 20 to 25% CO2 reduction is available. Euro VII is on the way with a further 15% CO2 Reduction mandated for these vehicles. The ECO Driving mentioned (Page 40) references a further 2 to 15% saving in Emissions. The IRHA " Low Hanging Fruits" of increased use of HVO, Night Time deliveries, Traffic Light Sequencing, Express HGV Lanes at Tolls and Adjusted Ferry Times. would all contribute to reduced fuel use and emissions. A potential total of 40% is proposed here with a further 10% Possible, *none of which is referenced or pursued.*

PAGE 35 Quote

Though in recent years, there has been a high level of uncertainty as to the likely technological pathway for decarbonising heavy-duty vehicles (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 vehicle drivetrains emerging as the preferred technology. However, the path and pace of this transition remains less clear. with a need for transitional measures.

While the above is stated, there is no further reference to any Transitional measures other than the AFHDV Grant references on pages 40 and 41. This Grant scheme in the context of HGV's is of little or no value as the vehicle types listed are either Not Available or the fuel required to operate them is not available. This is even confirmed on Page 55 where it states *"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"*

And yet this Draft boasts of making **Grants available for vehicles that are not available coupled to a confirmed fuel supply that won't be available for 8 years to operate these same vehicles.**

In the IRHA submission we state that *"To expedite any uptake will require, an operational advantage or incentive, as well as:"*

- Greater awareness among transport companies of vehicles' environmental credentials.
- Any alternative fuelled vehicle to have been trialled in Irish conditions to prove its capability.
- These vehicles are available in axle configurations to match Ireland's regulatory and physical requirements.
- Implications for the Consignor/Consignee for the environmental implications of the transport aspect of its operation.
- State support for any purchases and fuelling investments to include technical back up and training.
- Fuelling infrastructure nationally established, linked into an EU wide infrastructure to accommodate both the National and International haulier.
- Manufacturers and retailers to demonstrate full knowledge and back up of the technology in components and expertise.
- All planning and insurance issues for the storage, distribution and consumption of these alternative fuels to be resolved before any rollout.

NONE of the above are dealt with in the DRAFT.

N.B. With the UK now out of the EU and having its own Non EU Type approval for any new vehicles, Ireland stands alone in having the only Right Handed Steering requirement (Along with Malta) in the EU. The Manufacturers will not be rushing to make models of EU Type Approval for our market due to its scale and with any made for the UK most likely built to UK Type Approval and not the EU's ie Ireland..

PAGE 36 Graph

The Best Case Scenario shows a 46.5% sale share of alternative fuelled vehicles in 2030 to be a potential 630,000. So while this is a target for many, it has to be said it represents 1% of the total HGV's on EU Roads making for 99% of the EU Fleet still consuming diesel. So what is in the Draft to ensure that these remaining 99% of HGV's are the least polluting possible by ALL being Euro VI and Euro VII, preferably ALL Euro VII Diesel. Nothing is the answer to the question i.e. **NO Transition in place or proposed.**

Page 40 confirms this approach, QUOTE **"Given the long life-span of vehicles used in the freight sector, there is a risk that providing additional supports that incentivise the continuation or replacement of diesel-based fleets will ultimately result in a delayed green transition for the sector."**

The existing Fleet will obviously be expected to continue for the next 10 to 15 years in that case, as no other option is being proposed, within any time frame or certainty required by the Transport Operator.

PAGE 40 Quote

"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% of the cost of installing smart telematics hardware and software in eligible vehicles."

We wish to highlight the above as Euro VI and Euro VII have all the technology referenced and more, including safety/Driver aids as standard so the above is unnecessary and wasteful in the context of what could be achieved through directly supporting the modern HGV as a replacement of older Diesel vehicles. The State not only gets an environmental improvement but the additional return of the intrinsic technology, thereby improving road safety for all.

PAGE 43 Quote

"Dublin has been chosen as one of two 'Urban Living Lab' cities for the SENATOR Urban Freight logistics project"

From the IRHA submission, consideration needs to be given to Ferry Timetables contributing to congestion, Night Time deliveries including Container terminal operating times, coupled to a City Permit system that recognises lower emission vehicles including Euro VI and Euro VII Diesel. None of these are referenced within the DRAFT, but are part of our "Low Hanging Fruits" within said submission which have a focus on Dublin.

There is **NO REFERENCE** to any of these suggested pursuits in either the Decarbonisation of Transport OR Urban Living Lab.

PAGE 50 Quotes

"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 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 IRHA use of the term "Green Rebate" was in the context of a greater rebate being paid to the Diesel fuel used by vehicles of lower emissions ie Euro V, VI and VII but as written it suggests that its consideration in the DRAFT is now within the context of excise repayment of that applied to the Bio Fuel component of the Diesel, with the current Diesel Fuel Rebate to be removed.

The suggestion of increased use of HVO over the Bio Fuels Obligation scheme was also proposed, especially in any pursuit of Euro VI HGV's as these modern vehicles can run on 100% HVO. **NOT REFERENCED**

IRHA SUBMISSION :

Within the IRHA Submission, 9 items were referenced under the heading " Low Hanging Fruits", all of which would achieve improvements of operation for our Transport Sector, while achieving a reduction in Emissions. **NONE WERE REFERENCED** in the DRAFT save for ECO Driving where the State is considering setting up an approved ECO Driving course with accreditation, which will be looked into. This is already done by the IRHA with a QQI Level 5 SMART/ECO Driving program which the RSA have refused to use in the CPC Modules. Another delay in what could have been happening 2 years ago !!

On Page 14, the IRHA listed some issues that needed to be addressed a part of any uptake of Alternate Fuelled HGV's. **NONE WERE REFERENCED** in the DRAFT 10 Year Transport Strategy.

On Page 16, the IRHA made **6 suggestions of which only 1 is referenced** ie the CPC and its current review. The IRHA have been seeking a review for 8 Years now and were involved in its review in Brussels culminating in [Directive 2018/645](#), which has not been implemented to date by the RSA ie after 4 years !!. We have since met with Mr

Kristian Schmidt and Ms Eva Polowski of DG MOVE in Brussels which has resulted in the IRU being tasked with a full CPC review in which the IRHA are involved. Action in Brussels, little or no action in Ireland.

On page 19, the IRHA suggested a National Policy be formulated to deal with our Hedges and Ditches which included a video showing the issue, not just for Transport Operators but for ALL Road Users. **NO REFERENCE MADE.**

On pages 19,20 and 21 the IRHA dealt with the Risk Rating system as it was at the time and not only how unfair and punitive the system as applied by the RSA was, but any attempt by the IRHA for change in Ireland was unsuccessful. We have since been involved in its review in Brussels with the IRU, which afforded us the distinct pleasure of being the ones to inform the RSA of a very positive outcome in Brussels. This is in the process of implementation currently across the EU. **NO OUTCOME** in Ireland

On Pages 26 and 27, the IRHA raise concerns and issues with the Exceptional Loads Procedures in Ireland and issues around our Drivers Licenses. **NONE WERE REFERENCED** in the Draft response.

Final Observations regarding ACTIONS as listed on Pages 94 to 102:

On Pages 94 and 95, **ACTIONS Relevant to the Haulage sector** are listed. 25 of the 28 are focussed only on Decarbonisation. Is this not a 10 Year Transport Strategy Document ??

Of the **ROAD SAFETY ACTIONS**, Action 50 is the Risk Rating scheme for Hauliers which the IRHA successfully contributed to its change in Brussels, where now it has a value in its measure. Prior to this it was a burden without value with our efforts for it to be changed in Ireland failing. The remaining actions culminate in an additional regulatory burden on the transport sector.

On Pages 99 to 102 are **ROAD HAULAGE STRATEGY ACTIONS**, 33 in Total of which 15 are about Decarbonisation. These ACTIONS reflect a 3 prong approach to this all consuming pursuit of decarbonisation, which includes a "Hydrogen Strategy" , "Pursuit of Project Causeway", which is an abject failure to date and putting in a "EV Charging structure Nationally for HGV's". How any of these are aligned with putting more Freight onto our Rail Network is beyond us, especially in the light of the age profile of Irish Rail Diesel/Electric Trains. For such a small Island Nation to take on such a monumental task by pursuing 3 different approaches without any overlap seems overly ambitious, unnecessary, extremely costly and without ANY TRANSITION model in place other than to leave the existing Fleet to operate until the new Technologies are in place. What a shot in the dark the Nation is making, based on predictions by EU based Truck Manufacturers alongside our "first out of the trap" environmental pursuits. The IRHA wishes to again reference its submission to this process as a final statement as part of its response to the 10 Year Transport Strategy Draft Document.

The Irish road transport industry has no option other than to continue to rely on a primarily diesel fuelled fleet. In the meantime, the State needs to support the upgrading of the existing fleet to the most modern diesel engines available, while the State and the manufacturers and their retailers, State agencies, Planning authorities, Insurance bodies and Fuel suppliers need to work to accommodate the transition to alternatively fuelled vehicles. The IRHA, in line with the industry experts identified above, anticipate this will take at least 10 years for all that is required to be in place. Irish Government policy needs to recognise that a move to decarbonisation of the national HGV fleet over the next 10 years will have to accept that diesel will remain the main transmission source for the national fleet. Ensuring that diesel powers HGVs with the minimal possible level of fuel consumption and emissions needs to be a key priority, rather than the current approach of penalising diesel fuel, regardless of the efficiency of the engines involved, and instead relying on technologies which are only still in the pilot stage. To not acknowledge this and fail to support a fleet upgrade NOW would be another "missed opportunity" to join the many gone before.

Paula Monagle
Irish Road Haulage Association
Suite 6, Gowna Plaza, Bracetown Business Park,
Clonee, Co. Meath, D15 VY77
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Email: [REDACTED] Web: www.irha.ie

The IRHA wishes to thank our Corporate Sponsors for their support:



From: Brendan Meighan (Transport) <[REDACTED]>
Sent: Thursday, April 6, 2023 10:33 AM
To: Paula Monagle <[REDACTED]>
Subject: RE: IRHA Submission to second public consultation on Road Haulage Strategy
Importance: High

Hi Paula,

Just checking in again about this request. Apologies for all the emails but we are looking to publish the submissions document in the near future so will need the final revised copy of the IRHA's submission.

Kind Regards,
 Brendan

From: Brendan Meighan (Transport)
Sent: Tuesday 4 April 2023 14:38
To: 'Paula Monagle' <[REDACTED]>
Subject: RE: IRHA Submission to second public consultation on Road Haulage Strategy
Importance: High

Hi Paula,

Could you please resend me the revised copy of the IRHA's email submission to the second public consultation on the Road Haulage Strategy so it can be included in the published submission document?

Kind Regards,
 Brendan

From: Brendan Meighan (Transport)
Sent: Tuesday 14 February 2023 13:42
To: 'Paula Monagle' <[REDACTED]>
Cc: Aideen Morrissey (Transport) <[REDACTED]>; IRHA President [REDACTED]
Subject: RE: IRHA Submission to second public consultation on Road Haulage Strategy

Hi Paula,

Thanks for your reply. Unfortunately I cannot see your revised version of the email. Could you please send it to me again? I will then incorporate it into our Submissions document.

Kind Regards,
 Brendan

From: Paula Monagle <[REDACTED]>
Sent: Tuesday 14 February 2023 12:51
To: Brendan Meighan (Transport) <[REDACTED]>
Cc: Aideen Morrissey (Transport) <[REDACTED]>; IRHA President [REDACTED]
Subject: RE: IRHA Submission to second public consultation on Road Haulage Strategy

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Hi Brendan,

I have sent you a revised version of the mail. I have taken out Paul's personal statements as they did not represent the Irish Road Haulage Association views. The facts as they are listed otherwise are a good reflection of our discussion on the day.

Regards
Paula

Paula Monagle
Office Manager
Irish Road Haulage Association
Suite 6, Gowna Plaza, Bracetown Business Park,
Clonee, Co. Meath, D15 VY77
Tel: +353 1 8013380
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From: Brendan Meighan (Transport) <[REDACTED]>
Sent: Tuesday 14 February 2023 11:41
To: Paula Monagle <[REDACTED]>
Cc: Aideen Morrissey (Transport) <[REDACTED]>
Subject: RE: IRHA Submission to second public consultation on Road Haulage Strategy

Hi Paula,

I was just wondering if you were OK with having the attached email published, as I outlined below?

Kind Regards,
Brendan

From: Brendan Meighan (Transport)
Sent: Tuesday 7 February 2023 16:22

To: 'Paula Monagle' <[REDACTED]>
Cc: Aideen Morrissey (Transport) <[REDACTED]>
Subject: IRHA Submission to second public consultation on Road Haulage Strategy

Hi Paula,

The Department is currently working on collating all submissions we received during the second public consultation on the Road Haulage Strategy and is planning to publish them together in a single document. We would like to take this opportunity to again thank the IRHA for their valuable input during this consultation phase.

We received both a hard copy submission from the IRHA as well as a detailed email from Paul Jackman. Having reviewed both, it seems that Paul's email (attached) mirrors the contents of the hard copy. This being the case, would the IRHA be happy for us to publish the email as their formal submission? For data protection reasons, the Department will redact submissions before publication to ensure that no private or sensitive information enters the public domain.

Kind Regards,
Brendan Meighan
Road Transport and Freight Policy Division

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

[REDACTED] www.gov.ie/transport

Brendan Meighan (Transport)

From: Michael Mc Mahon <[REDACTED]>
Sent: Wednesday 30 November 2022 13:40
To: Transport haulagestrategy
Subject: 10 year National Haulage Strategy

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To Whom it may concern

I would like to make a submission to the National Strategy on Haulage.

I believe there is a pilot being recommended for the introduction of the 15.65 m trailer to the Irish Market. I am glad this is being planned.

I would recommend that the Dept would run a second pilot alongside the above pilot. This being the Double link trailer option Giving 54% more floor space per movement versus 15% on the 15.65 m option. Overall weight capacity of 60 Tonnes and overall length of 25.25 meters.

Advantages to the double link system

Fuel efficiency
Less CO2
2 journeys instead of 3
Will help address Driver Shortage
54% extra capacity.

I would value you adding my submission to the Strategy.

Kind Regards

Michael Mc Mahon
[REDACTED]
[REDACTED]
Co Clare

[REDACTED]
[REDACTED]

Department of Transport
Leeson Lane
Dublin 2.

2nd December 2022

Re: Ten-year Strategy for the Haulage Sector - Second Consultation

Dear Sir/Madam,

The National Transport Authority (NTA) welcomes the draft Road Haulage Strategy 2022-2031 and submits the following recommendations for the Department’s consideration. These are focused on a number of the Actions, set out in Annex 3 to the report. Any recommended amendments to the Actions are presented with a supporting rationale.

Action 23 - Request the NTA to consider the development of HGV Management Strategies for the Metropolitan Areas – Cork, Galway, Limerick and Waterford.

	Action	Lead Owner
Action 23	<p><i>Request the NTA to lead, in consultation with key stakeholders, the Development of Strategies for Sustainable Freight Distribution HGV Management Strategies for the Greater Dublin Area and the Metropolitan Areas Cork, Galway, Limerick and Waterford.</i></p> <p><i>Regional Assemblies, with the NTA, to lead the development of Regional-Level Freight Strategies in consultation with key stakeholders, consistent with RSES’ objectives.</i></p>	D/Transport & NTA

The role of metropolitan area transport strategies in planning for the movement of goods

As a basis for achieving more effective management of good movement, including HGVs, the NTA would support the preparation of strategies for sustainable freight distribution for all of the larger urban centres, with a particular focus on the Greater Dublin Area and the metropolitan areas of the four regional cities. In doing so, the NTA would emphasise the fundamental importance of key stakeholder involvement (in addition to the NTA), in particular TII, Local Authorities, Irish Rail, Port and Airport operators, the haulage sector and key freight generating sectors of the economy.

The basis for this approach is set out in the Draft Greater Dublin Area Transport Strategy 2022-2042, (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.

The transport strategies recently prepared for Cork, Limerick and Waterford also recognise the importance of freight movement in the overall context of integrated land use and transport planning and this is something which will also be addressed in the upcoming review of the transport strategy for Galway.

Strategic Traffic Management Plan and Demand Management Scheme

In the case of the Greater Dublin Area, the NTA would highlight the intrinsic importance (in planning for the movement of goods) of two key elements associated with the GDA Transport Strategy – 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. It is recommended that the Road Haulage Strategy report makes specific reference to these elements in planning for sustainable freight distribution into and within the Greater Dublin Area. Whilst not currently required under the DTA Act, the preparation of equivalent plans/schemes for the regional cities' metropolitan areas would be similarly beneficial in planning for the movement of goods.

Framework for a Strategy for Sustainable Freight Distribution

Consistent with GDA Strategy Measure FREIGHT 1, a consultant team appointed by the NTA undertook to develop 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.

Freight Strategies at Regional Level and large non-metropolitan area settlements (Key Towns)

In addition to the five largest urban centres, the NTA would also advocate the active consideration of goods movement at regional level (Regional Freight Strategies), consistent with RSES' objectives (see recommendations under 'Action 2', below), 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. In this latter regard, the NTA would highlight the role of the RSES 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.

Action 2 – Establish a Road Freight Forum with representatives from relevant Government Departments, Agencies and the haulage, freight distribution and logistics sector

	Action	Lead Owner
Action 32	Establish a Road–Freight Forums <i>at Regional Level</i> , with representatives from relevant Government Departments, <i>Regional Assemblies, Local Authorities</i> , Agencies (<i>including the NTA and TII</i>), the haulage, freight distribution and logistics sectors <i>and Irish Rail</i> .	D/Transport & Regional Assemblies

The NTA would recommend that the establishment of Freight Forums relating both road and rail-based movement are considered at regional level, based on the Regional Assembly areas and in addition to those stakeholders already referenced, to include representatives from the Regional Assemblies (as co-leads with the Department of Transport), Local Authorities and Irish Rail. It is also recommended that specific reference is made to the NTA and TII under ‘Agencies’. It is suggested that these Freight Forums could form part of the Regional Freight Strategies’ consultation and decision-making structure.

Action 3 – 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.

	Action	Lead Owner
Action 43	<i>In consultation with the NTA and TII</i> , 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

Action 4 – 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.

	Action	Lead Owner
Action 54	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

The NTA would welcome the inclusion of Actions 3 and 4 whose objective is to increase access to and the sharing of data across Government Departments, government agencies (including the NTA and TII), and other key stakeholders (which should also include local authorities).

This approach would facilitate the identification of current data availability and quality, identify key data gaps and explore how these might be filled. It would also enable a more data-led approach to policy making and a better understanding the existing and potential roles that the strategic and local road networks, the rail network, ports and airports perform for movement of goods. In doing so, this

would support the basis for the NTA's recommendations under Action 23 and Action 2. The NTA would recommend early consultation with the NTA and TII in establishing the terms of reference of the study.

NTA Regional Models and the Movement of Goods

For the Department's information, the NTA regional models currently address goods movement,

- To ensure that the impact of goods movements on passenger traffic travel time is captured; and
- For appraisal purposes, where changes to traffic volume, and the access and travel times of goods are input into the economic and environmental evaluation.

The model has two steps in the process to forecast (road-based) goods demand.

1. Interregional demand is estimated, based on the growth in demographic variables (population and employment at both origin and destination level). Port-based demand is forecasted based on port growth assumptions (based, for example, on port masterplan assumptions) and TII's HGV forecasts. This is undertaken at an all-island level.
2. These values are then distributed to each regional model and combined with intra-regional goods demand, which is also grown based on similar demographic factors.

Modelling of Emissions

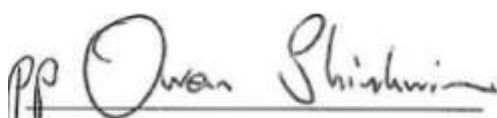
Regarding the calculation of emissions for goods, the NTA uses a tool based on the industry standard, COPERT but implemented at a street level (75,000kms out of 100,000kms total road network). The Regional Models' transport data is accepted as base data for EU requirements noise and air quality mapping.

During the current regional model update programme, the NTA will introduce any improvements that emerge in terms the emission calculations. A particular focus is likely to be on the fleet side.

In addition, the NTA will be scoping out the appropriate updates to goods forecasting, to align with wider requirements in the industry.

It is requested that the foregoing comments are taken into consideration by the Department and in this regard, the NTA would welcome an opportunity to meet to further discuss the issues raised.

Yours sincerely,


Michael MacAree
Head of Strategic Planning

O'TOOLE
TRANSPORT >>

Allens Park,
Moycullen, Co. Galway,
Ireland. H91 Y640
Telephone +353 91 555604



Department of Transport,
Leeson Lane,
Dublin 2,
DO2 TR60

24 November 2022

RE: 10 Year National Haulage Strategy

To whom it may concern,

We understand that a 10 year road haulage strategy is in preparation by the department.

We believe that the strategy is looking at a pilot of longer trailers up to 15.65m.

We believe that the department should now champion and promote the European Modular System with gross weights of up to 60T and 25.25m in length. This system allows for a 54% increase in pallet capacity or equivalent loading space versus 15% with the 15.65m LST.

In addition, the European system is best for fuel efficiency, overcoming the driver shortage and less congestion on the roads. Furthermore, it is a very environmentally friendly system with Co2 savings of 25%.

Yours faithfully,

Laurence O'Toole

* GALWAY * DUBLIN * GLASGOW * WARRINGTON *



Brendan Meighan (Transport)

From: Justin Martin <[REDACTED]>
Sent: Monday 21 November 2022 15:49
To: Transport haulagestrategy
Subject: RE: Irish 10-Year Road Haulage Strategy

CAUTION: This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

Hi Brendan,

I reviewed Sections 7.5 and 7.6 of the of the published doc with my Enforcement hat. I have nothing substantive to add other than the following: The first bullet on page 79 should read as follows:

- 17,769 vehicles inspected at the roadside for roadworthiness and 4,265 vehicle maintenance related premises inspections

The 1,627 figure quoted in the doc is the number of bi-lateral checkpoints we carried out with our colleagues in An Garda Síochána and not the number of roadworthiness inspections as quoted. Only a small thing but I thought it worth clarifying.

Two other significant initiatives that might be worth referencing in the finalised document which will impact on the haulage operators are as follows:

- In 2023 RSA will implement an Electronic Data Capture solution for recording inspection activity moving away from the current paper based system. Benefits to the operator will be more efficient inspections and instantaneous access to inspection reports.
- In 2023-2024 RSA (in conjunction with DoT) will implement the EU's Common risk rating formula. The legal basis for the common formula is [Commission Implementing Regulation \(EU\) 2022/695](#) pursuant to Article 9(1) of [Enforcement Directive 2006/22/EC](#), as modified by Directive (EU) 2020/1057. The ultimate aim of introducing 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 Union rules; and to facilitate the exchange of information on risk scores in the context of cross-border enforcement.

Regards,

Justin



Justin Martin
Head of Enforcement | Vehicle Testing & Enforcement

Road Safety Authority, Clonfert House,
Bride Street, Loughrea, Co. Galway, H62 ET93.
Tel. (091) 872653, Mob. [REDACTED]

From: Transport haulagestrategy <haulagestrategy@transport.gov.ie>
Sent: Wednesday 9 November 2022 11:21
Subject: Irish 10-Year Road Haulage Strategy
Importance: High

***** CAUTION: This email came from outside the RSA. Do not click on any links or open attachments unless you know the sender and are sure the content is safe ***** .

Dear All,

I am pleased to inform you that the second phase of public consultation on the Irish Government's 10-Year Road Haulage Strategy is now open. Further details on the submission process, as well as a link to the draft Strategy, are available via the link below.

[gov.ie](http://www.gov.ie) - [Second Public Consultation on Ten-year Strategy for the Haulage Sector \(www.gov.ie\)](http://www.gov.ie)

Kind Regards,
Brendan Meighan
Road Transport and Freight Policy Division

An Roinn Iompair
Department of Transport

Lána Líosain, Baile Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60

 www.gov.ie/transport

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[Road Safety Authority](http://www.rsa.ie)

Sustainability and Decarbonisation

Electric vehicles

Scania is still quoting that 50% of sales by 2030 will be electric vehicles. As the local distributor for Scania we are working to ensure that we have good quality electric vehicles available, and more importantly the back-up services, including technical training and facilities that will be vital to their long term operation.

With much higher capital costs, and uncertain (but expected lower) operational costs, continued Government supports for these BEV's (Battery Electric Vehicle) will be vital.

We will officially launch SCANIA BEVs on the Irish market in mid-2023 at a time where we believe that the technology is matured sufficiently to be commercially viable. That said, even with improved range, most operators will require the use of **strategically located high powered chargers** to support their limited range. Otherwise, the rollout of BEV's will be severely curtailed to a limited number of hauliers who can logistically support operate within these constraints.

Scania are adamant that the BEV's we sell should run on green electricity, to allow us to reach our sustainability targets. However, the ideal of running on 100% green electricity is a matter outside of our control.

Renewable fuels

Gas truck sales have been a mainstay for Scania, but were negatively impacted by the escalation in CNG costs following the outbreak of the Ukrainian war. The rise in the availability of bio methane towards the end of 2022 has prompted a renewed interest in this sector, and we believe that gas powered vehicles should be seen as a reliable, green alternative, offering a lower cost entry for hauliers who need trucks with *almost* the flexibility of their diesel powered vehicles.

HVO

Scania approved HVO EN15940 as a fuel in all its Euro IV, V & VI diesel truck & bus engines. No adaptations are needed and tests would indicate similar tailpipe emissions, but allied with slightly higher fuel consumption (3-5%). The price of HVO is currently a barrier to its use.

There are many potential costs for hauliers who choose these alternatives; more planning and commitment to sustainability will be needed, together with the willingness to take risk. As manufacturers, we will endeavour to package options that negate some of the risk, but there are several unknowns such as battery life and residual values which may affect progress. Overall, Government policies will shape the outcome, but Scania has done the investments and has the products.

Overall, the Hybrid (PHEV) era has passed in our opinion, being too difficult to monitor when such vehicles are actually operating on “green power”.

Other technologies can only prosper if Government supports and controls are in place.

The Department of Transport

Leeson Lane

Dublin 2

DO2 TR60

30 November 2022

Re: 10-Year Road Haulage Strategy

To whom it may concern,

As a Chamber of Commerce representing over 320 companies in Shannon and the wider Mid-West region, Shannon Chamber is cognisant of the vital role the road haulage sector plays in growing the region's economy. We welcome the fact that the Department of Transport is working towards developing a ten-year strategy for this sector, driven by the need to generate efficiencies and improve standards, as well as helping the sector to move to a low-carbon future.

Having recently established a Sustainability Task Force to encourage and enable our members to attain carbon neutral in line with the Government's Climate Action Plan, we would like to make comment by way of contribution to the new road haulage strategy.

Our membership in this sector have made us aware of the fact that the most sustainable new development in European road transport has been the European Modular System, which, with gross weights of up to 60T and 25.25m in length, allows for a 54% increase in pallet capacity, through attaching a 7 metre trailer(s) to a standard 13.6 trailer.

We have been advised that this system has been trialled throughout Europe and has been found to be most sustainable as it reduces the number of engines required to transport an increased number of trailers e.g., one truck with additional trailers attached. Introducing such a system would contribute to increased fuel efficiency, address the issue of driver shortage in the sector and reduce congestion on the roads. It is a very environmentally friendly system with Co2 savings of 25%.

Shannon Chamber concurs with our road haulage members' views that this system should be given consideration by the Department of Transport when formulating the new 10-year Road Haulage Strategy.

Yours sincerely



Helen Downes

Chief Executive

Shannon Chamber, Suite 14, Shannon Airport House, Shannon, Co Clare V14 E370

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Road Transport Freight Policy Division,
Department of Transport,
Leeson Lane,
Dublin 2.
haulagestrategy@transport.gov.ie

30th November 2022

**Re: Submission to Ireland's Road Haulage Strategy 2022-2031
Technical Follow Up to Initial Submission to the Draft Ten-Year Strategy for the Haulage Sector
SRA File Ref: 21/GD003**

A Chara,

The Southern Regional Assembly (SRA) welcome the publication of the Draft Ireland's Road Haulage Strategy 2022-2031. This submission is made as a technical follow up to our submission on the Draft Ten-Year Strategy for the Haulage Sector on 16th July 2021.

This submission is structured as follows:

- 1.0 Past SRA Recommendations to the Draft Ten-Year Strategy for the Haulage Sector
- 2.0 Recommendations for the Final Ireland's Road Haulage Strategy 2022-2031
- 2.1 Freight, Ports and Harbours and Airport Strategies in the Southern Region
- 2.2 Integrate the Regional Assemblies within the proposed Road Freight Forum
- 2.3 Opportunity for Future Data Sharing
- Conclusion

1.0 Past SRA Recommendations to the Draft Ten-Year Strategy for the Haulage Sector

In our past submission, the SRA made recommendations for:

- **Decarbonisation of Transport:** Zero or lower-emitting alternative vehicle technologies and clean energy fueling station infrastructure with an emphasis on greening the freight sector.
- **Enhance Road Networks and Public Transport Corridors:** Enhance the Region's strategic road networks and public transport corridors that connect the Region's Cities and Metropolitan Areas, Ports and Airports, Economic Corridors and Key Towns.
- **Regional and International Connectivity of Freight:** Completing the TEN-T Core and Comprehensive Networks and strengthening sustainable multi-modal (road and rail) networks for freight and passenger mobility between ports, airports and urban nodes.
- **Maintain, Enhance and Extend Rail Infrastructure for Strengthened Intermodal Transport:** Support increased integration between road and rail for freight movement as part of our Region's strengthened multi-modal transport networks between urban nodes, ports and airports.
- **Metropolitan Transport Plans and Local Transport Plans:** Support the preparation and implementation of Metropolitan Area Transport Strategies and Local Transport Plans which

will be transformative game changers for sustainable transport infrastructure led planning for cities, metropolitan areas, key towns and other settlements. These plans will also be effective for freight, delivery and services management.

- **Intelligent Transport Systems and Smart Mobility:** As part of a Smart Region, support innovation in transport, public and private sector collaborations, testing and deploying smarter transport and logistics infrastructure region wide. Such innovation will benefit lower carbon distribution of goods (break bulk facilities to smaller low carbon vehicles), especially last mile journeys servicing urban centres.

2.0 Recommendations for the Final Ireland’s Road Haulage Strategy 2022-2031

The SRA commend the comprehensive strategy prepared following stakeholder consultation. It is evident that the recommendations made in our submission have been addressed in a comprehensive manner under the seven policy themes of the draft strategy.

The SRA especially welcome support in Section 7.4 “Integrated Transport Planning & Intermodal Transport” for the Regional Spatial and Economic Strategies (RSEs) in each Region and the shared objectives for integrated transport planning, strengthened regional and rural connectivity, connectivity to our ports and airports and multi modal movement of goods within and between the regions. Support is also stated and welcomed for the implementation of the Cork, Limerick-Shannon and Waterford Metropolitan Transport Strategies and for Local Transport Plans for sustainable freight management.

The following three recommendations are further provided to strengthen regional level support for the final strategy and implementation of actions.

2.1 Freight, Ports and Harbours and Airport Strategies in the Southern Region

Recommendation 1: Support the development of the Southern Region’s Freight, Ports and Harbours and Airport Strategies within the final Ireland’s Road Haulage Strategy and in the implementation of Actions 22-25.

Reasons for Recommendation 1

The region’s support to strengthen our sustainable future for multi-modal freight, ports and aviation sectors is critical not only for our transition to a low carbon future and meeting CO2 reduction targets in transport under the Climate Action Plan as identified by the draft strategy. It is also essential to ensure we have resilient regional and international connectivity for efficient supply chains that will serve our targeted population and economic growth and grow our state and regional economies under the NPF and RSES¹.

The SRA, with stakeholder consultation and specialist service research input, will progress the preparation of separate but inter-related strategies for Freight, Ports and Airports to achieve National Planning Framework (NPF) and RSES priorities for Enhanced Regional Accessibility, Sustainable Mobility and High-Quality International Connectivity. These strategies are mandated under RSES implementation².

¹ By 2040, the population of the Region is projected to rise to almost two million, requiring new homes and jobs. RSES Appendix 1, page 347 sets out Local Authority population projections to 2031, which combined deliver a projected uplift between 280,000 to 343,500 in the Region to 2031.

² RSES Regional Transport Strategy Chapter 6 and Regional Policy Objectives 141, 145 and 149. These strategies will be prepared in coordination with the Department of Transport, Transport Authorities (NTA, TII) and other stakeholders.

The SRA have prepared and shared with the Department of Transport Project Charters setting out the objectives and deliverables of these strategies. To be effective, it is essential our Freight, Ports and Harbours and Airport Strategies are tailored to support central government policy making and implementation.

It has been agreed with the Department's Divisions for Ports Policy and Aviation Policy that our work on these strategies can be focused to assist the review of National Ports and Aviation Policy. This is important to leverage the regional tier to assist the work of central government and coordinate regional stakeholders to bring regional level consensus on the priorities to be acted on.

Working with the regional tier will assist central governments achievement of regional parity and balanced regional development, a policy of government under the NPF.³

Our statutory role in setting the framework for planning and economic development of the Region provides an opportunity to connect the implementation of national strategies to local level actions and delivering regional initiatives under RSES implementation in partnership with stakeholders and local authorities.

Our role as a managing authority under European Regional Development Funding⁴ and as a partner Region in EU cooperation projects brings an impactful opportunity to apply EU good practice and knowledge within our RSES implementation actions.

We consider our forthcoming work on Freight, Port and Airport Strategies can align to the implementation of actions under the final Road Haulage Strategy. There is positive precedence for this where the Regional Assemblies are integrated on the Leadership Team and Delivery Team for the implementation of actions under the National Sustainable Mobility Policy, which is proving effective to give regional level support and momentum for actions⁵. The Regional Assemblies have also been contacted by the Department for integration with the Department's Zero Emissions Vehicles Ireland EV Infrastructure Strategy, to assist regional level coordination and implementation of the final strategy through EV network plans at regional and sub regional level.

The support of the Road Transport and Freight Policy Division and guidance for the freight element of these strategies, advice on the regional research and the regional coordination that will be effective to assist the Department implement the Road Haulage Strategy within the Regions, will be welcomed.

We believe a signal of intent for this under Section 7.4 "Integrated Transport Planning & Intermodal Transport" will be a positive addition to the draft. The inclusion of the Regional Assemblies as a stakeholder in the multi sectoral implementation structure to deliver actions under the Road Haulage Strategy⁶ (see Recommendation No 2) and consultation meeting with the Road Transport and Freight Policy Division on our Region's work in support of freight, ports and airport sectors is recommended.

³ The Southern Region has the State's most significant proposition to achieve the aim of Regional Parity. The NPF and RSES targets our three cities to grow by over 50% to 2040 as part of a structural realignment away from the Greater Dublin Area with a 50:50 distribution of growth between the Eastern and Midlands region and the Southern and Northern and Western Regions.

⁴ The Southern, Eastern and Midland Regional Programme 2021-2027 was formally announced by Government on the 29th November 2022 <http://www.southernassembly.ie/news/news-article/641-million-investment>

⁵ The SRA initiated and are the project lead for Pathfinder Project 30 : A training, education and capacity building workshop programme to support Local Authorities and Stakeholders in each of the three Regions to design and implement smart and sustainable mobility projects under the National Sustainable Mobility Policy (SMP) Action Plan 2022-2025

⁶ Draft Road Haulage Strategy Actions 22-25 especially.

Below are some of the thematic priorities and actions of the Draft Road Haulage Strategy the SRA fully support and which our regional role and RSES implementation will support:

- **Inter-Modal Freight**
 - Develop inter-modal freight networks through an expanding role for rail freight and interchange facilities , serving as multi-purpose freight interchange and distribution centres linking the rail and road networks. The implementation of Rail Freight 2040 and the final All Island Strategic Rail Review in our Region are key to achieving progress. Both will support investment in strengthening and expanding our rail freight assets, support existing rail links to Waterford Port and Rosslare Europort, the reinstated Shannon Foynes rail connection (making significant progress) and the feasibility of rail services to the Port of Cork facilities at Marino Point. The potential to develop inter road and rail terminal infrastructure at Limerick Junction will also progress through these strategies⁷.
- **Logistic Hubs**
 - Develop logistic hubs for freight consolidation and distribution through zero/low-carbon last mile delivery services and micro mobility (e.g. e-cargo bikes) outside/adjacent to urban centres including our Region’s Cities and Metropolitan Areas and larger Key Towns⁸.
- **TEN-T Network**
 - Continued investment in the maintenance and enhancement of the TEN-T Core and Comprehensive Network through our Region and investment for multi-modal, lower carbon freight connectivity along the national Economic Corridors through our Region (Atlantic Economic Corridor and Eastern Corridor extending to Rosslare Europort)⁹. The SRA continue to support the delivery of strategic road infrastructure projects identified in the NDP, RSES and Metropolitan Transport Strategies accessing our Port facilities (Port of Cork, Port of Shannon Foynes, Port of Waterford, Rosslare Europort and Regional Ports and Harbours). These are essential as economic lifelines and resilience in our Region, as key connections as part of multi modal freight corridors, enable public transport (bus) corridors and unlock city centre urban regeneration such as city dockland regeneration.
- **Smart Mobility**
 - Support for demonstration projects, living labs and testing innovation in technology deployment and new approaches to lower carbon freight movement. The Draft Strategy has given prominence to EU and UK innovations that may have ability to be replicated. This is especially an opportunity for zero carbon urban logistics and last mile delivery. The SRA fully support these priorities and will seek to integrate both its Regional Planning and EU Projects functions under the forthcoming work for freight, ports and airports, looking at innovations in practice in other EU regions. This commitment for project collaboration and innovative solutions in the strategy also accords with the SRA’s Smart Southern Region initiative. Smart freight systems will be an integral part of achieving zero carbon smart cities, towns and rural areas in the Region¹⁰.
- **Decarbonisation of the Transport Sector**
 - Actions in support of developing and deploying green and renewable fuel, innovations in the HGV sector to transition to lower carbon emission vehicles, meeting the commitments of the Climate Action Plan and EU priorities for this sector through the Fit for 55 legislative package are all supported by RSES objectives for decarbonisation

⁷ Supported by Regional Policy Objectives 139, 140, 141, 146, 150, 158, 166, 167, 168, 170

⁸ Supported by Regional Policy Objectives 139, 140, 141, 151, 157, 160, 161, 162, 164

⁹ Supported by Regional Policy Objectives 41, 42, 68, 139, 140, 141, 146, 150, 166, 167, 168, 170

¹⁰ Supported by Regional Policy Objectives 133, 134, 160, 161, 162 and prioritised under our Region’s forthcoming Towards a Smart Southern Region initiative.

of the transport sector¹¹. These priorities and actions¹² will be supported by RSES actions for regional decarbonisation and increasing renewable energy generation.

2.2 Integrate the Regional Assemblies within the proposed Road Freight Forum

Recommendation 2: Integrate the Regional Assemblies within the proposed Road Freight Forum.

Reason for Recommendation 2

The SRA welcome the initiative of the Department of Transport to establish a Road Freight Forum as an implementation governance mechanism for the strategy, to assess policy and strategy performance, to share perspectives and address issues of common interest. We support the following especially:

- Action 2: Establish a Road Freight Forum with representatives from relevant Government Departments, Agencies and the haulage, freight distribution and logistics sector.

Supporting resilience, green transition, inter-modality and future growth of the freight sector, and road haulage as integral to that sector, is essential for the future sustainable population and employment growth of the Region.

Our support to improve the efficient functioning of freight and supply chains, support for strengthening our TEN-T network, support for connectivity to and between our ports and airports are priorities for RSES implementation. Many RSES objectives under the national and regional priorities for Enhanced Regional Accessibility, Sustainable Mobility, High Quality International Connectivity are aligned to the priorities and actions of Irelands Road Haulage Strategy 2022-2031.

As noted in the reasons for Recommendations 1 and 3, RSES implementation initiatives can significantly assist the work of central government policy and strategy implementation via the regional tier. Positive opportunities to collaborate and synergise arise.

Equally, central government backing and guidance to our regional level actions under shared priorities gives us considerable additional mandate and strength in seeking actions through our regional planning and economic development roles.

Being part of the Road Freight Form gives an opportunity to contribute to the work of stakeholders, inform stakeholders of our initiatives that support their sector and provide a regional perspective and dimension to the work of the Forum. It may allow streamlining between different actions under different strategies and plans amongst forum members.

Stakeholders of the Forum , if aware of our initiatives under RSES implementation, may identify effective approaches and collaboration in our regional level work for freight, ports and harbours, airports, regional decarbonisation, a smart region, data sharing inter alia that benefits the implementation of actions across our organisations, which supports in turn the implementation of the Road Haulage Strategy.

The SRA will welcome a reference for this potential within the final strategy and inclusion of the Regional Assemblies on the Road Freight Forum through the implementation structures of the Road Haulage Strategy.

¹¹ Supported by Regional Policy Objectives 87, 90, 91, 92, 93.

¹² Draft Haulage Strategy Actions 5-17 especially.

2.3 Opportunity for Future Data Sharing

Recommendation 3: As freight and HGV sectoral data and analytics strengthens, explore the feasibility to share this data with the new Regional Development Monitor tool, an initiative of the Regional Assemblies, to assist stakeholder work on evidence-based implementation of Ireland's Road Haulage Strategy 2022-2031.

Reason for Recommendation 3

The SRA welcome the commitment to strengthen data and analytics sharing for the freight and HGV sectors with two positive Actions led by the Department of Transport :

- Action 3: 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.
- Action 4: 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.

The SRA support strengthening, addressing research and data gaps and sharing data between sectors to inform evidence-based policy and decision making, as committed under the Draft Road Haulage Strategy.

A transformative initiative of the Regional Assemblies on the theme of evolving accessible data tools to assist policy and decision making of all our regional stakeholders as been the development of the Regional Development Monitor (RDM).

Recently launched on the 29th of November, the Regional Development Monitor (RDM) is a significant new planning innovation in Ireland developed through a Strategic Partnership between the three Regional Assemblies and the All Island Research Observatory (AIRO) & Ordnance Survey Ireland (OSI) (GeoHive) to provide a monitoring system and an online mapping viewer for key indicators of progress towards balanced regional development.

The RDM Indicators are focussed on Key Regional Strategic Outcomes (RSOs) and a range of related socio-economic and environmental data sources across 4 Themes:

- Our People and Place
- Our Green and Sustainable Future
- Our Region's Economy
- An All-Island Perspective

The RDM and will support the future implementation of the RSES, the NPF and *Project Ireland 2040* and provides an active on-line resource of up to data with regular updates to local authorities, public agencies and the general public.

This tool will provide a significant resource to assist stakeholders across the freight policy, planning and operation sectors. It is a tool that can integrate new themes and data sources. When appropriate, it can create relevant indicators for the freight sector in consultation with the data bodies , enabling data to be shared by stakeholders who support the implementation of the Road Haulage Strategy.

The link to the RDM is (<https://rdm.geohive.ie/>). The SRA will welcome a reference for this potential within the final strategy and engagement on this theme through the implementation structures of the Road Haulage Strategy.

Conclusion

I trust the above recommendations can be taken on board to help strengthen the final strategy and the implementation of actions. The SRA would welcome the opportunity to engage with the Department of Transport on these recommendations and are available for future consultation and clarities as required.

Mise le meas,

A handwritten signature in blue ink, appearing to read 'David Kelly'.

David Kelly,
Director Southern Regional Assembly

Department of Transport,
Leeson Lane ,
Dublin 2 ,
DO2TR60

24 November 2022

RE: 10 year National Haulage Strategy

To whom it may concern,

We understand that a 10 year road haulage strategy is in preparation by the department.

We believe that the strategy is looking at a pilot of longer trailers up to 15.65m.

We believe that the department should now champion and promote the European modular system with weights of up to 60T and 25.25m in length. This system allows for a 54% increase in pallets or equivalent floor space versus 15% with the 15.65m LST.

In addition, the European system is best for fuel efficiency, overcoming the driver shortage and less congestion on the roads. Furthermore, it is a very environmentally friendly system with Co2 savings of 25%.

Yours faithfully,

Richard Lowey

T&R Lowey International Ltd
Cashel
Castleblayney
Co. Monaghan

00 353 47 80777

DoT draft
Road Haulage Strategy
2022-2031

TII Submission

Date: 30 November 2022

Introduction

TII welcomes the Department's draft Road Haulage strategy 2022-2031 which focuses on freight, a very important element of the transport system which facilitates and supports the Irish economy. While freight transport is managed and operated by the private sector, TII considers that the state has a role in assisting the freight sector to become more efficient and sustainable.

TII welcomes the focus on the key themes in the strategy which includes: Crisis Management; Sustainability & Decarbonisation; Road Infrastructure & Usage Charging; Integrated Transport Planning & Intermodal Transport and Road Safety.

TII also welcomes the establishment of a Freight Forum and would be happy to participate in such a forum.

The following outlines TII comments across a number of themes from the draft road haulage strategy:

Theme: Brexit, COVID-19 and Crisis Management responses

Data sharing

TII welcomes the inclusion of a priority action (Action 4 & 5) aimed at increasing data sharing and mapping across various government departments and other key stakeholders. As pointed out in TII's initial consultation response, this approach can aid in understanding the critical role that National Roads infrastructure performs for movement of goods.

Maintaining international connectivity

Since Brexit, the importance of maintaining international connectivity from Dublin/Cork/Rosslare Ports to mainland European ports has been highlighted, due to a reduction in the use of the UK land-bridge.

TII would highlight the importance of the Cork to Ringaskiddy (M28) project, currently at judicial review. the Foynes to Limerick (N21/N69) project and also the continuing importance of Dublin Tunnel in providing access to and from Dublin Port.

Theme: Sustainability and Decarbonisation response

Carbon Emissions from Irish vehicle fleet

Carbon emissions associated with the movement of goods are significant. TII estimates that Heavy Goods Vehicles contribute to approximately 36% of the total carbon emissions associated with travel on National Roads at present. TII is currently exploring how the recently developed TII Road Emissions Model (REM) can be enhanced with an improved representation of the Heavy Goods Vehicle fleet and how this can be used to assess potential measures to decarbonise the movement of goods in Ireland.

Classified CO₂e Emissions Rates at Different Speeds based on National Fleet Breakdown, g/veh-km

Vehicle Type	5 kph	10 kph	20 kph	30 kph	40 kph	50 kph	60 kph	70 kph	80 kph	90 kph	100 kph	110 kph	120 kph
Small Petrol Car	511.04	286.67	177.47	144.22	130.43	124.77	123.48	124.95	128.37	133.29	139.44	146.65	154.81
Medium Petrol Car	605.56	350.67	221.74	178.55	157.81	146.84	141.43	139.76	140.94	144.46	150.01	157.42	166.54
Large Petrol Car	894.73	516.51	323.71	257.89	225.35	207.38	197.71	193.67	193.93	197.74	204.65	214.38	226.75
Small Diesel Car	358.71	221.95	145.09	113.97	96.14	85.08	78.65	75.90	76.38	79.83	86.09	95.07	106.69
Medium Diesel Car	383.36	246.60	169.74	138.63	120.79	109.74	103.30	100.56	101.04	104.48	110.74	119.72	131.35
Large Diesel Car	432.55	295.78	218.92	187.81	169.98	158.92	152.49	149.74	150.22	153.67	159.93	168.90	180.53
Small Hybrid Car	331.37	187.90	116.97	94.54	84.71	80.27	115.76	116.62	119.62	124.33	130.49	137.96	146.62
Medium Hybrid Car	387.92	226.95	144.70	116.57	102.75	95.26	134.21	132.38	133.46	136.97	142.63	150.26	159.74
Large Hybrid Car	558.62	326.90	208.01	166.89	146.31	134.80	188.77	184.92	185.21	188.97	195.78	205.41	217.67
Small PHEV Car	147.68	80.37	47.61	37.63	33.49	31.80	103.74	105.21	108.63	113.55	119.71	126.92	135.08
Medium PHEV Car	174.49	98.02	59.34	46.39	40.16	36.87	116.55	114.88	116.06	119.58	125.13	132.54	141.66
Large PHEV Car	258.81	145.35	87.51	67.76	58.00	52.61	164.73	160.70	160.95	164.76	171.67	181.41	193.77
LGV	792.02	430.67	252.96	198.14	175.64	167.47	168.02	174.85	187.43	205.77	230.39	261.98	301.67
Small HGV	647.98	541.93	406.96	343.16	314.09	304.21	306.04	317.28	339.38	376.26	-	-	-
Medium HGV	1141.64	925.07	672.22	546.14	479.16	446.98	436.04	439.76	458.47	500.17	-	-	-
Large HGV	2524.17	1892.73	1454.43	1223.04	1039.15	917.27	863.43	862.71	887.91	912.95	-	-	-

Figure 1 Emission rates for Irish fleet

Carbon emission rates for Heavy Goods Vehicles

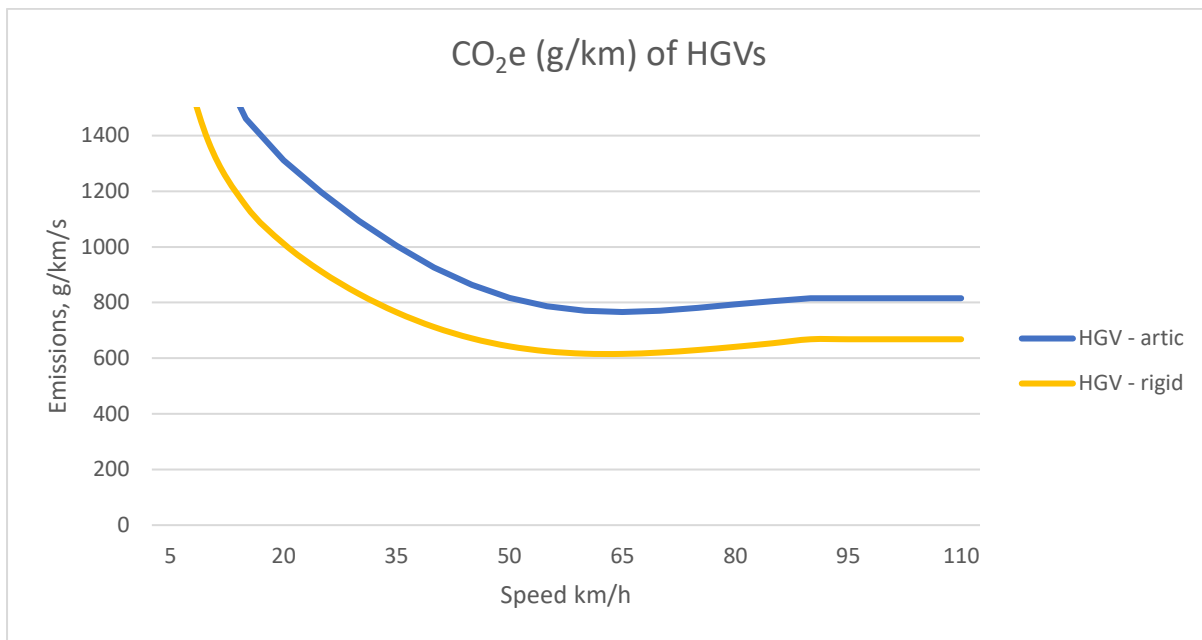


Figure 2 Speed and emissions relation for HGVs

Congestion and low speeds result in higher emissions from HGVs, as shown below in Figure 2-2. This is a particular issue on busy roads such as the M50 with a large proportion of heavy vehicles and occasional flow breakdown.

TII seeks to reduce these truck emissions through multiple interventions. Examples of such interventions include the following

- Rolling out the TII dynamic traffic management project on the M50 on a phased basis. With the dynamic traffic management project, TII seeks to reduce flow breakdown using variable speed limits, provision of traffic/congestion information, reduced variability in journey time and better lane distribution.
- Ensuring car drivers, who currently share roads with goods vehicle traffic, have alternative transport options such as safe active travel infrastructure. 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.

Logistic Hubs

TII notes that, in Action 8, the Department of Transport will be commissioning a study to examine the feasibility of developing logistic hubs near urban centres, which will aim to consolidate and rationalise freight transport. TII would like to highlight that it has commenced one such study to assess the potential of urban freight consolidation centres in the vicinity of national roads.

TII would like to explore the potential of such centres to support a reduction in HGV vehicle kilometres and improve network performance and safety for all road users. The study is currently at a conceptual level but will provide a foundation for more detailed work, such as pre-feasibility studies and feasibility studies.

Overall the aim of the TII study is to develop an initial high-level understanding of urban freight centres, their potential benefits, challenges, and limitations based on case studies from other countries. It will also aim to address institutional considerations, including the role that the government and other key stakeholders could play in the development of consolidation centres.

The existence of logistic hubs such as the An Post distribution centre at Port Laoise and the concentration of private sector logistic hubs adjacent to the N2 at Coldwaters and the N7 near Citywest and Naas shows the potential of these facilities.

Furthermore logistic centres could be strategic locations for alternative fuels/electric charging hubs.

Whilst in the strategy document, the lead owner of this task is the Department of Transport, TII may also have a role to play in supporting the Department to deliver on this action.

Micromobility

TII is of the view that enabling sustainable freight movement, including the last mile delivery through micro mobility, may also play a role in reducing the number of HGVs and HGV vehicle kilometres across the National Road Network. Such modal shift of freight movements would be anticipated to improve the performance and efficiency of the National Road Network whilst also having a beneficial impact on safety for all road users. Enabling more sustainable freight movements would require increased provision of active travel infrastructure in close proximity to the National Road Network to encourage micro-mobility, particularly in congested areas and where there are high levels of goods movements.

Theme: Road Safety response

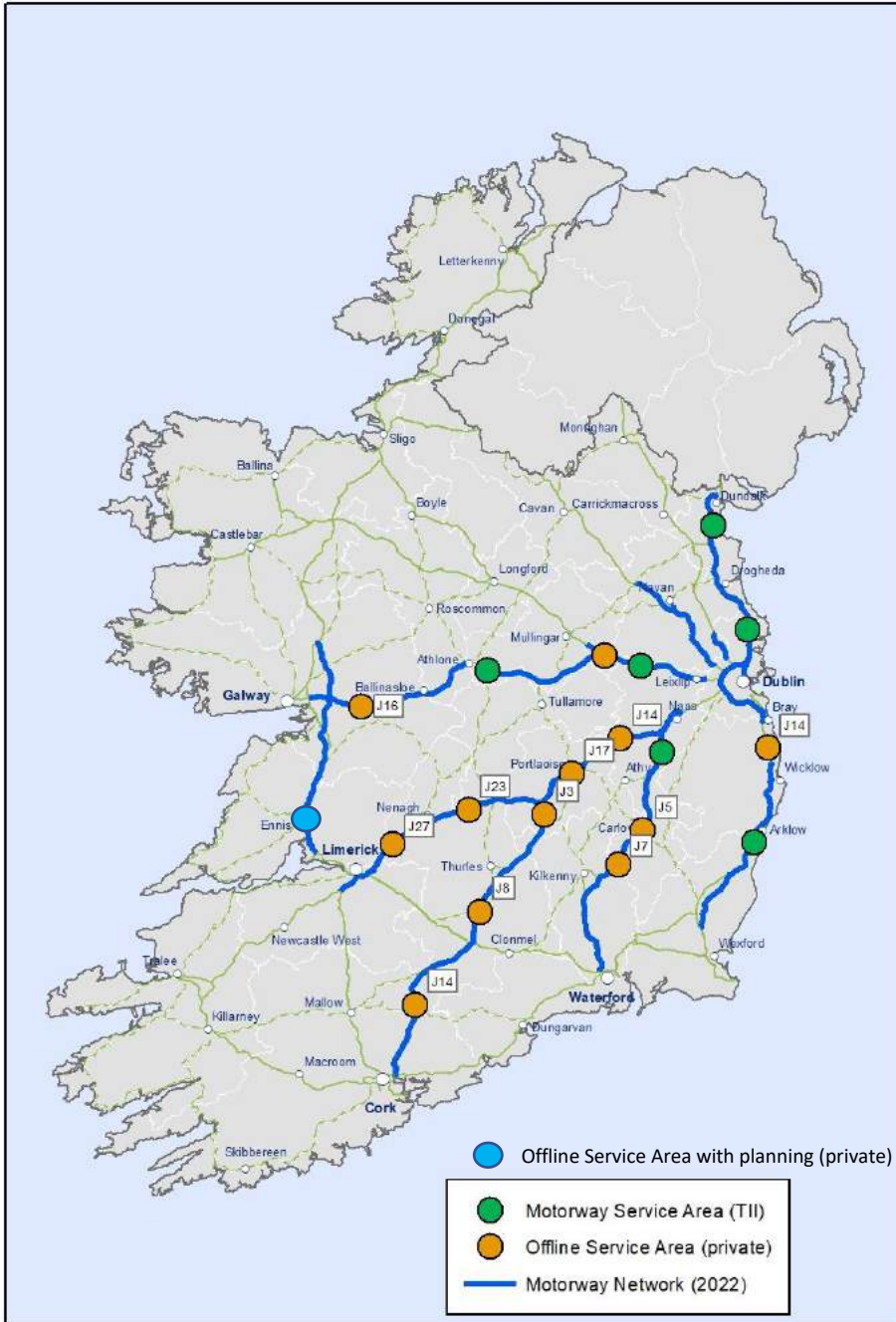
Safe Parking

TII will work with the Department to supply safe and secure parking for HGV particularly in the vicinity of the TEN-T road network. TII recognises the importance of these facilities to provide quality services to HGV drivers and to provide opportunities for rest. TII operate six of these service areas.

Since the publication of TII service area policy in 2014 the private sector has responded and provided facilities close to the Motorway junctions. See Map below.

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 work with the Road Safety Authority to improve public and haulier awareness of the existing Motorway service area locations and facilities.

Figure 3 Motorway Service Area status November 2022





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UPS Response to Ireland's Road Haulage Strategy – 2022 – 2031

November 2022

Background

UPS is one of the world's largest logistics companies, playing a vital role in the collection, warehouse and delivery of goods as well as having the world's largest in-house customs brokerage operations. Our current operations in Ireland includes over 1,200 employees (543,000 globally) across 20 facilities.

UPS welcomes the opportunity to provide comment on the Road Haulage Strategy and believes this is key to supporting a critical sector by addresses challenges that the industry is facing. We provided a response to last year's consultation and would like to outline a few key points based on the recent proposed strategy. We also support the response submitted by IBEC.

Covid/Brexit

The twin challenges of Covid and Brexit have illustrated how important both the physical movement of goods as well as the transmission of information around the goods are in keeping businesses trading and supply chains moving. Customs facilitation is key to ensuring goods can continue to move quickly without delays. It is really key that transport policy is aligned with trade policy and business growth priorities to ensure they work together to achieve benefits for the economy as a whole.

We welcome that the Strategy includes a proposal to establish a Road Freight Forum. We believe more engagement between government and the industry is beneficial to ensure the resiliency of supply chains and transport in response to key crisis such as a global pandemic as well as other disruptions related to weather, trade and other issues. Regular dialogue between the government and the industry is also key in highlighting wider issues such as discussed in the consultation from skills shortages and training to decarbonisation. These regular discussions can help to better inform policy and by working in partnership can achieve positive results.

Decarbonisation

UPS supports efforts to decarbonize transport and we are committed to finding solutions to reduce emissions and congestion and improve air quality. Below is a summary of the support we believe that transport companies need to accelerate the move to low/zero emission vehicles:

Vehicles:

A review of measures to promote the availability of electric vehicles – stricter OEM CO2 standards, OEM sales mix quotas, and incentives to move production to EVs as well a financial support for companies to transition to zero emission vehicles.

Infrastructure:

Reform of the market structure surrounding the upgrade of local electric grids so that the end user does not need to bear the entire upstream cost of the upgrade regardless of the owner of the upgraded asset.

Final Mile:

A review of the provision of facilities or space in city centers to enable e-assist cycle operations, including micro consolidation sites, e-cycle parking locations and charging facilities.

Renewable Fuels:

Government decarbonization plans should include a role for gas (biomethane) or HVO HGVs, and the corresponding infrastructure, as a key method for decarbonizing heavy goods transport, especially as a bridging solution which can deliver results immediately until other alternatives are developed.

Highway Electrification:

We welcome coordinated research into the feasibility and cost effectiveness of the electrification of highways. UPS believes that electrification will become a feasible sustainable solution for long distance heavy vehicles, but this will most likely require a combination of batteries for use on minor and urban roads with overhead catenary charging on major roads.

Urban Consolidation:

Rather than taking the risk associated with consolidating urban deliveries onto a single final mile operator, UPS supports expanding its innovative last-mile solutions developed to reduce carbon emissions and improve efficiency.

As a business, we already carry out a high degree of consolidation, as do many in our industry, as it is the most efficient way to operate. Our customers pay for an end-to-end service and we feel there are many sensitivities with consolidation centres that need to be considered. Whilst consolidation centres may also provide value for smaller delivery companies or operators that do not carry full loads, it could cause duplicate package handling and increase vehicle movements. It also needs to be clear once packages are handed over to a consolidation centre – who now owns the final mile delivery, including the cost, and how is the package data retained to provide visibility and transparency for the customer (data protection restrictions), end consumer and the logistics companies.

CountEmissions EU

UPS supports the CountEmissions EU initiative and believes that an EU scheme should be based on global, existing standards for calculating and reporting GHG, rather than forced modal shift.

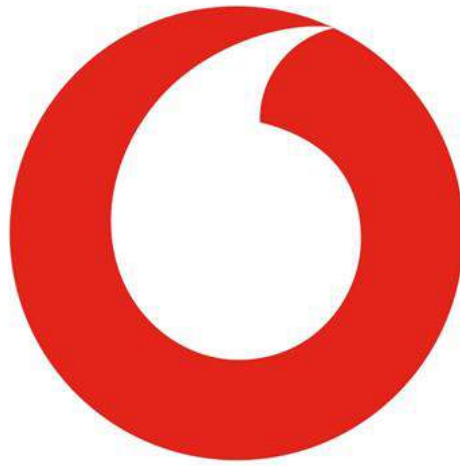
Airport/Aviation:

As outlined at the top of this response, transport and trade policy need to be aligned to help support growth and international trade. We believe it is important to understand the transport of goods and the importance of integrated movement of these goods into and out of the country. As an island nation, it is key that goods can move into and out of the country as easily as possible to support Irish businesses. Any night-time restriction could indirectly impact on the movement of goods to and from the airports. Air Freight flown at night is a very important mode of distribution in Ireland supporting €1.1 billion in GDP and 15,000 jobs¹. International trade does not operate in a single time zone. Trade must operate 24/7 within an interlinked global transport network and night flights are a necessity for express carriers to support the continued growth of the 24-hour global economy

For more information please contact:

Sarah Bell
Public Affairs Manager
UPS UK, Ireland & Nordics
[REDACTED]

^{1 1} "The Economic Impact of Cargo Night Flying at Dublin Airport" Freight Transport Association Ireland



Vodafone Ireland Submission to the Department of Transport

Second Public Consultation on Ten-year Strategy for the Haulage Sector

Version: Non-Confidential

Date: 30/11/2022

Introduction

Vodafone Ireland welcome the opportunity to respond to the Department's Consultation on the Ten-Year Strategy for the Haulage Sector. We remain at your disposal should you want to discuss any of the information contained within our response, in more detail.

Vodafone Ireland

For the purpose of the consultation, we confirm that Vodafone is a business; and is Ireland's leading total communications provider with 2.3 million customers and employs over 2,000 people directly and indirectly in Ireland. Vodafone provides a total range of communications solutions including voice, messaging, data, and fixed communications to consumers and to small, medium, and large businesses. Since 2011, Vodafone has expanded its enterprise division, offering integrated next-generation fixed and mobile solutions in addition to cloud-based platforms, machine-to-machine services, and professional ICT support.

Overview - Sustainability & Decarbonisation

For the purpose of this submission, we will focus our response on the ambitions and aims contained within Chapter 7.2: Sustainability & Decarbonisation, given the natural crossover with our areas of expertise. In particular we want to focus on the opportunities presented by Big Data Smart City Investments and 5G Transport Corridors.

Vodafone Ireland welcomes the progress made to date in the development of the Haulage Strategy, and in particular, the acknowledgment of the role innovation and digital technology will play in the sustainable transition of the transport sector.

The acknowledgment of the role increased digitalisation plays in the more efficient use of vehicles, combined with the ambitions around the adoption of intelligent transport systems are to be welcomed, however, meeting these targets, while striving for an economically robust and inclusive society, will rely on continued technological advances, particularly on investment in 5G infrastructure.

This is because many of these applications will rely on fast, reliable, and low latency connectivity. The realisation of these benefits will depend on the delivery of targets in the Government's draft Digital Connectivity Strategy, which recognises the need for commercial and public investment in this important infrastructure. We look forward to the publication of the final Strategy before the end of the year.

The most important lesson from the pandemic is that we all need to work together. Industry, governments, policy makers and civil society must find better ways to collaborate in investing in Ireland's digital future, to drive the 5G industrial revolution, to decarbonise for a cleaner energy future, to close the digital divide and to digitise SMEs.

Policy makers should take the opportunity to work in partnership with the private sector to jointly invest in critical digital infrastructure at an accelerated pace to transform the Irish economic landscape and kick start a new wave of digital innovation across a wide range of industries.

Big Data Smart City Investment

Achieving a fair and sustainable transition to a climate neutral society by 2050 will require action and investment in digital solutions across multiple sectors, and in particular transport.

As a global digital leader, and the largest provider of the Internet of Things (IoT) in the world, Vodafone is well positioned to drive the green transition through digital connectivity and improve lives as it enables urban digitalisation.

The result of this greater connectivity is smart ecosystems ranging from smart logistics to smart agriculture, smart cities, and smart energy. All of these systems rely on technology such as IoT, machine learning, artificial intelligence, and Big Data to develop and commercialise new applications. Some examples include:

- Smart logistics, which embeds IoT technologies in vehicles to optimise route management, vehicle maintenance and driver behaviour. Vodafone's IoT vehicle solutions are able to deliver cuts in fuel consumption of up to 30%, saving an estimated 4.8 million tonnes of CO₂e in 2020.¹
- Smart Cities, which improve the efficiency of energy-intensive services such as public transport, road networks and street lighting. In Guadalajara (Spain), Vodafone connected 13,500 LED streetlights to a central management system, reducing energy consumption by 68%.²
- Smart Meters, which enable households and businesses to monitor and reduce their energy use, lowering energy bills and the environmental impact of energy production. Worldwide, Vodafone's IoT platforms have connected over 12 million smart meters, saving c.1.6 million tonnes of CO₂e last year.³
- Smart Manufacturing, which enables factories to be more efficient, reduce wastage and have a lower environmental impact through emissions and pollution reduction.

Digital infrastructure underpins every aspect of European economy and society. It is critical to building back better, transforming Europe into a global powerhouse, re-establishing its leading industrial role, and turbocharging the digital green transition.

If we look at smart transport in more detail, we can explore the opportunities that investment in connectivity infrastructure provides.

The economic performance of a city is reliant on people and goods being able to move around quickly and efficiently. Connected mobility infrastructure can help cities optimise traffic flows and public transport services to reduce congestion and support citizens' mobility.

If we take traffic in a city like Dublin for example, it ebbs and flows like a river. In a river we know exactly where it starts, where it flows fast, where it flows slow, where it floods, where its shallow. That information lets us build dams, canals, water overflows etc. With traffic however, we just know if its busy or quiet. Big data would change that.

- Automatic Number-Plate Recognition (ANPR) Artificial Intelligence (AI) based camera systems – understand not just when an area is congested but crucially, where that congestion has come from and where it is going. If we can understand the beginning to end journey of vehicles as and when they enter and leave major route ways, this would allow the following:
 - Road planning: How much of the M50 congestion is caused by traffic going around Dublin? How much is caused by traffic that doesn't want to go to Dublin at all and instead is just

¹ Vodafone Europe Connected Digital for Green Report - https://www.vodafone.com/sites/default/files/2021-01/europeconnected_digital_for_green.pdf

² ibid

³ ibid

travelling from Kildare to Belfast or Wicklow to Maynooth, for example? Does Dublin need a secondary, further out ring road project to cater for this and how much of the M50 would it free up – 20%, 40%?

- Does Sligo need to be connected to Galway via motorway? AI based cameras can tell you exactly how many vehicles make that exact journey every day.
- Is a bypass of Kilkenny required that joins the M9 and M7?

All of the above information feeds into route optimisation, which has been rightly identified by the Department as a key objective towards a more sustainable future for the haulage sector. If you ask any haulier the above questions, their answer would likely be yes, however, Government needs appropriate and reliable data to back up significant capital expenditure decisions such as this. That data is gained through camera-based AI analysis.

These smart ecosystems all require fast, secure, and reliable connectivity to gather and process data, which makes 5G deployment a key driver of success in this area. Adding IoT, edge computing and the further application of Big Data solutions, these emerging technologies could be transformative.

5G Motorway Corridor

Ireland is already a hub of automotive investment and industry development. The Future Mobility Campus Ireland based in Shannon has attracted large and niche (JLR, Renovo etc) international players alike and Munster Technological University last year launched its first Automotive Degree for future fleet managers.

As we move to 2030 and the oncoming ban of Internal Combustion Engine (Petrol, Diesel) vehicles, electric and subsequently smart and autonomous cars will become more prevalent on Irish roads.

This all means that Ireland has a unique opportunity to become a global leader in 5G adoption and be at the forefront of automotive industry development, fast-tracking the enablement of smart trucks, containers, and goods at a faster rate. Such a move would attract more FDI from multinational auto companies looking to launch autonomous vehicles in Europe, with the global connected car market projected to reach a value of €200 billion by 2025.⁴

This technology will transform the automotive and transport sectors, leading to an array of benefits:

- Improved productivity from reduced driving times – the cost of traffic jams may be as high as 1% of EU GDP⁵
- Improved fuel efficiency and reduced emissions - transport is responsible for nearly 30% of the EU's total CO2 emissions⁶
- Fewer road accidents - 23,400 people were killed in road accidents in 2018 in the EU⁷

Beyond these first order impacts, there is considerable scope for broader industrial agglomeration benefits around connected autonomous mobility (CAM) enabled transport corridors. These are derived from gains that occur when proximity reduces transport costs – and specifically where the costs of moving goods, people and ideas are reduced.

⁴ <https://5g-ppp.eu/wp-content/uploads/2019/10/20191031-Initial-Proposal-5G-SDA-for-CAM-in-Europe.pdf>

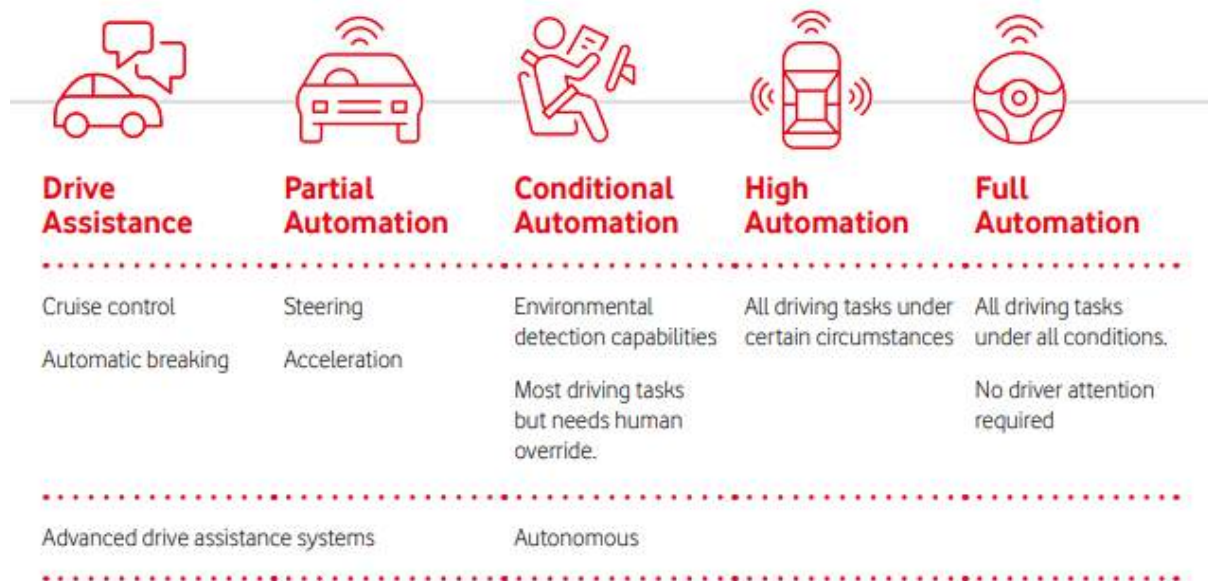
⁵ <https://ec.europa.eu/jrc/en/publication/eur-scientific-and-technical-research-reports/measuring-road-congestion>

⁶ <https://www.europarl.europa.eu/news/en/headlines/society/20190313STO31218/co2-emissions-from-cars-facts-and-figures-infographics>

⁷ <https://www.europarl.europa.eu/news/en/headlines/society/20190313STO31218/co2-emissions-from-cars-facts-and-figures-infographics>

Enhanced connectivity links, both digital and traditional transport, are key building blocks for the development of successful industrial zones and clusters. Therefore, in the short term, the development of transformational 5G along motorways in Ireland, and the associated fibre networks, could lead to the development of industrial zones along key routes as businesses take advantage of the logistical benefits of these locations and strong mobile and fixed connectivity.

In terms of CAM itself, it generally refers to autonomous/connected vehicles or self-driving vehicles that can guide themselves without human intervention. There are several levels of autonomy, ranging from advanced drive assistance systems like cruise control and automatic braking, to autonomous environmental detection capabilities and all the way to full automation, as can be seen in the graphic below, with the role of the driver reducing at each level.



In addition to economic benefits, the ubiquitous mobile connectivity needed for automated vehicles is expected to generate a wide range of societal benefits. CAM will create new opportunities for growth in the SME sector by enabling new transport and distribution solutions, and by supporting greater diversity in working environments.

By integrating mobility and security systems, cities can improve traffic flow for emergency response, increase driver and pedestrian safety, and optimise security management through better resource allocation.

Challenges for Investment

With Big Data Smart Cities and 5G Corridors, and many of the other sustainability objectives included in the draft Strategy, there is a requirement for ultra-reliability and low latency, necessitating the development of 5G networks with functional redundancy.

The realisation of benefits from these growth drivers relies on prior investment in 5G 'built right' across Ireland, in particular along transport routes to ensure that stakeholders across the value chain can have sufficient confidence and interest in the future of the technology.

However, without an immediate business case, investment by the private sector in 5G networks is likely to be prioritised in urban areas where the immediate business case is stronger. This means that there is a failure of the market to deliver sufficient investment along these transport routes.

It is important to point out that 5G will only have truly transformational potential for Ireland and Europe when built right, that is delivering the very high speeds and super low latency needed for 5G industrial

transformation. The majority of 5G delivered to date in Europe has been via Dynamic Spectrum Sharing (DSS), which is where existing bands between 4G and 5G are shared, which only delivers speeds similar to 4G.

5G built right (operating at mid-band frequencies i.e., 3.5GHz or higher) allows outdoor peak speeds of 1Gbps and 4Gbps in mobile private networks. New industrial tech and data companies will emerge in the regions of the world that are first-to-market and will establish a global lead that other regions will struggle to match. Ireland, and indeed Europe, must therefore be the leader in the 5G industrial transformation, rather than a follower.

There are of course economic opportunities for mobile operators associated with autonomous vehicles, including the provision of SIMs, services, and data. However, there is uncertainty as to whether it will generate sufficient return to incentivise the significant investment involved in deploying 5G networks along transport routes, as just in urban areas it costs at least 5 times as much as 4G⁸, and given the long lead times on other key CAM-enabling technology.

In order to truly unlock Ireland's digital and green potential over the coming years, and to create equal access to high-speed connectivity for homes and businesses, public and private investment in network infrastructure is vital. We are excited to be part of the solution to Ireland's recovery and to work with Government and key partners to support the delivery of these new investment opportunities.

Europe's Digital Decade Agenda and Ireland's 'Harnessing Digital Framework' already prioritise the roll out of 5G and gigabit infrastructure to support its industrial future.

To deliver on its Sustainability & Decarbonisation ambitions from the Haulage Strategy, Ireland must:

- Enable a fast 5G rollout allowing Ireland and Europe to catch up with and overtake their global rivals.
- Implement a joined-up, long term industrial strategy that prioritises investment in digital infrastructure and innovation, where digitalisation allows businesses in all sectors to thrive.
- Incentivise firms to share data in a trusted environment to secure the value from data.
- Create ambitious 'designed-for-IoT' policy frameworks.
- Roll out 5G connectivity and 5G-enabled solutions across Ireland so that businesses of all sizes – large enterprises and SMEs alike – have access.
- Create a boost from private investment in 5G and telecoms to continue the momentum of the Recovery and Resilience Facility by reviewing the incentives for investment, market structure and regulatory barriers.

While the investment needed is large, the benefits can be expected to significantly outweigh these costs.

As we have seen in the past, infrastructure spending is one of the key levers that government can pull to stimulate the economy. According to a 2014 study by the IMF, an unanticipated increase in capital spending of 1% of GDP leads to a 0.4% uplift in output, and a 1.5% rise four years later. This economic dividend occurs because building or deploying new infrastructure lays the groundwork for future economic growth, whether that's an improved transport network to move goods or digital infrastructure to power a new economy.

As global demand for new digital technologies increases, so too does the value of becoming an international leader in 5G. The innovation, productivity benefits and sustained international competitiveness in a critical growth sector will help sustain long-term economic growth.

⁸ Calculations extrapolated from our 4 largest European markets indicated that **in order to cover 60% of the EU population with 3.5GHz (including 100% of sites with Low + Mid-Band) costs can go up to €150 billion Euros in the next years.** A typical 4G urban upgrade can require €15k Capex while a typical 5G built right urban upgrade can cost between €73-98K. These figures are comparable to recent calculations from Analysis Mason for Ericsson and Qualcomm - [Analysis Mason document](#)

Brendan Meighan (Transport)

From: Padraig Barrett <[REDACTED]>
Sent: Thursday 15 December 2022 16:00
To: Transport haulagestrategy
Subject: Ten Year Strategy for the Haulage Sector

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Dear Sir/Madam

Apologies for the late submission, but I would like to add the following comments on the Road Infrastructure and road safety elements of this strategy, it appears to concentrate on two things;

1. How funding for roads in the future will be funded to a greater extent by Users (especially HGV's) through shadow tolling. We wonder why the tolling cannot be continued post PPP and let these sections of roads continue to be nett contributors. The tolling process could be managed by specialist companies on a tendering basis.
2. How Road Safety infringements are to be further discouraged by fixed penalties, but I would have thought that such is the case already and any increase in the categories of violations, incurring penalty points, could simply grind haulage to a halt. Perhaps it would be better to use technology within vehicles to apply limiters to truck speeds, loads etc and to monitor hours driven without a break. I think that if road tolling is to be stepped up to pay for road infrastructure than it should be on a fair basis of 'polluter pays', whereby the toll paid should be based on the amount of damage caused to the road which could be automatically measured through road detectors measuring axle loading per vehicle. Hence a laden vehicle would engender a greater journey toll than an unladen one.

Regards & thanks,

Padraig

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